

THE ANNEXE AT 11-13 WHITELADIES ROAD, BRISTOL, BS8 1PB.

Planning Statement for
Urban Creation (11-13WLR) Ltd
June 2025
Our Ref: 25-00053

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Quality Assurance

This report has been prepared within the quality system operated at Rapleys LLP according to British Standard ISO 9001:2015.

We confirm that the undersigned is an appropriately qualified and experienced Chartered Planner experienced in the commercial property sector.

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1 INTRODUCTION

Overview

1.1 This Planning Supporting Statement has been prepared by Rapleys LLP on behalf of Urban Creation (11-13 WLR) Ltd, the freehold owner of the site and applicant. It supports an application seeking full planning permission to deliver 4 Mews houses for short-term let to replace the rear annexe at 11-13 Whiteladies Road.

1.2 The formal description of development is therefore as follows:

Demolition of the rear annexe and delivery of 4 mews houses for short-term let with associated landscaping and other works.

Submitted Plans and Documents

1.3 In addition to this Planning Supporting Statement, the following documents and drawings comprise the full application package:

- Suite existing and proposed plans produced by Shu Architects:
 - 2131 400-Location Plan
 - 2131 401-Existing Site Plan
 - 2131 402-Floor Plans
 - 2131 403-Elevations
 - 2131 404-Proposed Site Plan
 - 2131 405-Section and Garden Store
 - 2131 HDAS 2025-06-13
 - 2131 Waste Statement - Mews Houses

2 SITE DESCRIPTION

Context

- 2.1 The site is 11-13 Whiteladies Road, a 3-storey semi-detached period style building set back from the road. The main building has a basement, and to the rear of the site, there is a standalone single-storey annexe. The site benefits from ample parking both to the front and the rear of the property, along with two vehicle entrances, both accessed directly off Whiteladies Road.
- 2.2 This application focuses entirely on the rear annexe and does not seek to change any part of the main 11-13 Whiteladies Road building.
- 2.3 Whiteladies Road is a significant route for vehicular travel into Bristol City Centre. There are several public transport options available within proximity of the site, including bus stops and other forms of sustainable transport such as electric scooters and public bicycles.
- 2.4 The immediate area surrounding the site, namely the Triangle and Park Street, is highly sustainable. It has a variety of commercial units, including shops, bars, restaurants, public parks, employment opportunities, and a range of different types and tenures of residential development. Additionally, the University of Bristol's main Campus is situated approximately 300 meters away.
- 2.5 The site is located within the Whiteladies Road Conservation Area, there are also several listed buildings in the immediate vicinity, including 7 & 9 Whiteladies Road to the south which are Grade II listed buildings (Historic England reference number 1202690) and were listed in 1994.



Conservation Area Description.

- 2.6 The immediate area is characterised by the tree-lined street of Whiteladies Road and large period buildings, predominantly arranged as semi-detached properties. The properties on the east side

of Whiteladies Road front onto an avenue of mature trees, have generous plot sizes, including large front gardens, many of which are now parking courtyards. The properties are characterised by their attractive façades, many of which are finished with bath stone and painted timber sash windows. Nos. 11-13 Whiteladies Road was built between 1855 and 1874 as a pair of residential villas.

Relevant Designations

2.7 The Bristol City Council Local Plan Policies Map identifies the following designations which are of relevance to the site: The site is located within the Whiteladies Road Conservation Area.

- The site is within Flood Zone 1.
- The site falls within the 'City Centre' district.
- The site falls within the 'Bristol Central Area Plan Boundary'.
- The site falls within the City Centre Area 'The West End'.

Planning History

2.8 The planning history for the site is limited. For completeness, all previous applications shown on Bristol City Council's planning applications database have been listed below:

Reference Number	Description of Development	Status
89/01364/L	Demolition of workshop at rear addition of 4 no. windows to existing building & erection of three storey office.	GRANTED subject to condition(s)
89/01378/F	Erection of three storey office building with associated car parking.	REFUSED
90/02139/F	Refurbishment of existing annexe (to 11-13 Whiteladies Road) to provide office accommodation.	GRANTED subject to condition(s)
94/01342/A	Non-illuminated company sign and car park sign.	GRANTED subject to condition(s)
02/01802/F	Continuation of use of two rooms located on the first floor as an Appointment Only Manicure Studio (Class D1).	GRANTED subject to condition(s)
02/00459/F	Erection of first floor extension to single storey building at rear, to provide additional office accommodation.	REFUSED

Reference Number	Description of Development	Status
02/02297/F	Erection of first floor extension to single storey building at rear, to provide additional office accommodation (Use class B1).	GRANTED subject to condition(s)
06/04952/VC	Felling of 3 Ash trees located to the rear of the property.	Preservation Order NOT REQUIRED
25/10493/COU	Application to determine if prior approval is required for a proposed: Change of use from Commercial, Business and Service (Use Class E) to Dwellinghouses (Use Class C3) Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) - Schedule 2, Part 3, Class MA - 17 dwellings.	GRANTED subject to condition(s)
25/10495/F	Installation of bin and bike storage, enlargement of roof lights and light wells and other works.	GRANTED Subject to condition(s)
25/11594/F	Change of use from office to provide 20 no. short term lets/Guesthouse/hotel (Use class C1) and associated works.	UNDER CONSIDERATION

- 2.9 The applications listed above relate to the wider site, which also includes the frontage building. There are, however, three applications within this list which are of particular relevance to this current proposal. These are set out below:
- 2.10 The first relevant consent (Ref: 02/02297/F), was an application which was approved in 2002, which proposed the development of the rear annexe by way of addition of a second floor with associated internal and external improvements. This application was approved with four conditions, one of which required the newly built second storey to match the existing original work adjacent. This consent, therefore, concluded that the principle of the second story can be acceptable, subject to appropriate design.
- 2.11 The second relevant consent (Ref: 25/10493/COU) passed through the consultation process without raising an objection. This permitted development consent permits the change of use from an office (Use Class E) to a dwelling house (Use Class C3), showing that the loss of office use class is acceptable in this location. The implications of this application are discussed in full within the Key Planning Considerations section below.
- 2.12 The third relevant application (Ref: 25/11594/F) is currently under consideration with Bristol City Council. This application seeks full planning permission for the conversion of the main building at 11-13 Whiteladies Road from office (Use Class E) to 20. No short-term let units (Use Class C1), alongside associated works.

3 PLANNING POLICY CONTEXT

The Development Plan

3.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires Local Planning Authorities to determine planning applications in accordance with the Development Plan, unless material considerations indicate otherwise.

3.2 In this instance, the following Development Plan documents and policies are considered relevant:

Bristol Core Strategy (June 2011)

- Policy BCS5 Housing Provision
- Policy BCS10 Transport and Access Improvements
- Policy BCS11 Infrastructure and Developer Contributions
- Policy BCS13 Climate Change
- Policy BCS14 Sustainable Energy
- Policy BCS15 Sustainable Design and Construction
- Policy BCS16 Flood Risk and Water Management
- Policy BCS18 Housing Type
- Policy BCS20 Effective and Efficient Use of Land
- Policy BCS21 Quality Urban Design
- Policy BCS22 Conservation and the Historic Environment
- Policy BCS23 Pollution

Site Allocations and Development Management DPD (July 2014)

- Policy DM1 Presumption in favour of sustainable development
- Policy DM2 Residential Sub-divisions, Shared and Specialist Housing
- Policy DM23 Transport Development Management
- Policy DM26 Local Character and Distinctiveness
- Policy DM27 Layout and Form
- Policy DM28 Public Realm
- Policy DM29 Design of New Buildings
- Policy DM31 Heritage Assets
- Policy DM32 Recycling and Refuse Provision in New Development
- Policy DM33 Pollution Control, Air Quality and Water Quality

- Policy DM35 Noise Mitigation

Supplementary Planning Documents / Guidance

- Urban Living SPD1: Making successful places at higher densities.
- Climate Change and Sustainability Practice Note (2012)
- Planning Obligations SPD
- Broadband Connectivity Practice Note
- Waste and Recycling: Collection and Storage Facilities (2017)
- A Guide to Cycle Parking Provision (2005)
- Travel Plan for New Developments

National Planning Policy Framework

3.3 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. It provides a framework within which local planning authorities can produce their own development plans. In addition to providing guidance for local planning authorities and decision-takers in the compilation of plans, the NPPF is also a material consideration in determining applications. A presumption in favour of sustainable development is at the centre of the NPPF.

3.4 National Planning Policies pertinent to this application include:

90. Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Planning policies should:

(a) define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters;

3.5 Additionally, following the ruling of *Mead v The Secretary of State for Levelling Up, Housing and Communities* [2024] it is now the case that Planning Practice Guidance ('PPG') has the same legal status as the National Planning Policy Framework ('NPPF'). Noting this, consideration has been given to relevant extracts of Planning Practice Guidance throughout the development of this proposal.

Emerging Development Plan

3.6 Bristol City Council is in the process of preparing a new Local Plan, which will replace most of the current Development Plan documents. The emerging plan was submitted to the Secretary of State for examination on 25th of April 2024. Hearing sessions for the examination have recently concluded, although adoption is unlikely until 2026. The inspectors Main Modifications are expected this summer.

3.7 Paragraph 49 of the NPPF states that, from the day of publication, LPAs may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan, the extent to which there are unresolved objections to relevant policies, and the degree of consistency of the relevant policies in the emerging plan to the NPPF.

3.8 Given that the plan has now been submitted and has been subject to examination it is noted that draft policies will likely be afforded some, albeit limited, weight in the decision-making process. Relevant draft policies are as follows:

3.9 Emerging Policy DS1 Bristol City Centre states:

Bristol City Centre's role as a regional focus at the centre of a global 24-hour city will be promoted and strengthened. Development will include mixed uses for offices, residential, retail, leisure, tourism, entertainment and arts and cultural facilities.

3.10 Emerging Policy SSE1 Supporting Bristol's Centres – Network and Hierarchy reiterates the above, stating:

Retail development, offices, leisure (including food and drink), entertainment and night-time uses, arts, culture and tourism uses will be primarily located within or, where appropriate, adjoining the centres in the identified network and hierarchy serving Bristol.

3.11 The strategy recognises Park Street and Queens Road as some of Bristol City Centre's primary shopping areas and Whiteladies Road as a Town Centre, emphasising their appropriateness for tourism development.

3.12 Notably, there is no policy explicitly relating to the protection of office floorspace as required by adopted policies DM12 and BCAP7.

Community Infrastructure Levy (CIL)

3.13 In accordance with the Community Infrastructure Levy Regulations 2010, Bristol City Council have produced a CIL Charging Schedule which was adopted on 1st January 2013. The Charging Schedule sets out the amounts payable per sq.m of net additional floorspace for the majority of new developments.

4 THE PROPOSED DEVELOPMENT

Land Use

- 4.1 The development comprises the demolition of the existing annexe (Use Class E) and the construction of a two-storey annexe comprising 4 Mews houses for short-term let (Use Class C1) with associated landscaping and amenities. These 4 units will form additional C1 accommodation for the currently proposed Class C1 development within the main building (Ref: 25/11594/F). Noting this, some elements of the previous application, such as the reception, bike storage and waste storage, will also serve the accommodation proposed in this application. Throughout this statement, the elements which serve both applications will be clearly noted.

Design

- 4.2 The layout of the accommodation is shown in the proposed floor plans and site plan submitted with this application. Four two-storey units are to be delivered as shown below:

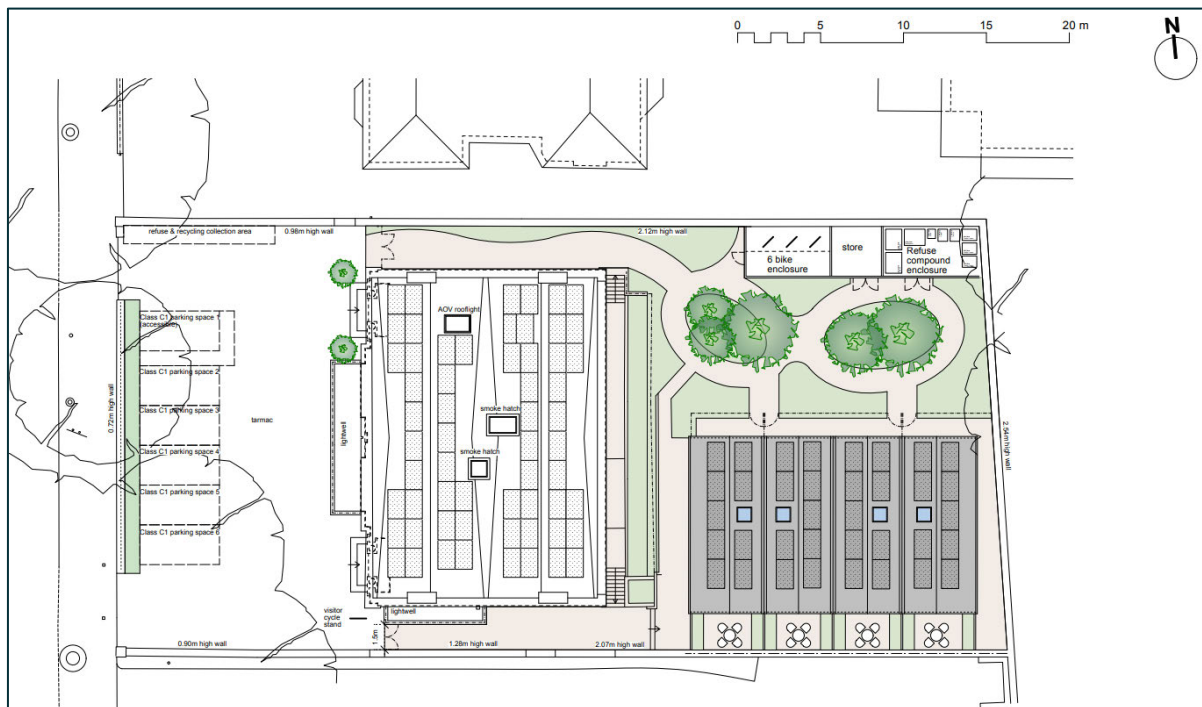


Figure 1 - Illustrated Site Plan



Figure 2 - Proposed North Elevation

- 4.3 The design and Access Statement produced by Shu Architects details how the investigation into the planning history and surrounding context informed the design approach. The final proposal shows a pitched roof form to reduce the impact on the development on the rear garden of 21 Elmdale Road, while also reflecting the pitched roof form of the large office extension to the rear of 7-9 Whiteladies Road. This also gives an attractive rhythm to the properties within the proposed landscaped courtyard.
- 4.4 In terms of materials, a two-tone brick facade and a high-quality painted timber elevation is proposed the ground floor. The wish is to use high-quality materials that will age well over time in a colour palette that complemented the adjacent buildings. The roof is proposed to be tiled in natural slate, offering another attractive material which is already prominent within the local area.
- 4.5 Internally, the flats will come equipped with all amenities expected within a short-term let guest house, these include a kitchen, bathroom, bedroom, laundry facilities and lounge area. The reception desk in the main building will act as the point of contact between guests and staff, with the annexe being entirely for guest use.

Scale and Massing

- 4.6 As delivery of this application requires the removal of the existing single-storey structure, its demolition offered an opportunity for improvements to the scale, massing and siting. Firstly, as the existing structure was built tight to the site boundary, this proposal has moved the mews houses away from the adjacent east and south boundary walls. This will reduce any dominance to the neighbouring properties, as well as create space for the private rear patios. Additionally, the proposed building footprint has been reduced on all sides, reducing the volume of the first storey considerably.

Accommodation & Amenity Space

- 4.7 It is proposed that the four units will all be two-bedroom, one bathroom, with a downstairs w.c. The full layout can be seen on the proposed floor plans. All units proposed are identical, albeit two will be mirror images of the others. Each unit is dual aspect on both floors, with windows facing to the north and south, thereby avoiding any potential conflict with the rear windows on the main building. Also, to provide additional natural light, rooflights are proposed above the second-story hallways.
- 4.8 Externally, directly to the north of the units, a landscaped frontage is proposed, which will provide a high-quality outlook for all the units within the annexe and allow future residents to enjoy access to the greenspace. To the rear of the annexe, each unit will benefit from a private patio, providing residents with outdoor space.

Highways & Transportation

Access

- 4.9 Access to the site for vehicles and pedestrians will remain the same as the existing situation which works well. Vehicles will enter and exit the site via Whiteladies Road with a one-way entrance and exit system.

- 4.10 Existing parking for the annexe office will be removed and replaced with a preferable landscaping area, which will provide a considerable enhancement. The existing car parking to the front of the site will remain in line with application ref: 25/11594/F.
- 4.11 The parking provision will be split. Car parking is located at the front of the property, whereas cycle parking is provided via a secure parking store located at the rear of the development, with a visitor's cycle space provided at the front of the site.
- 4.12 Full details and an annotated plan detailing the access provision are provided on Page 10 of the Heritage, Design and Access Statement.

Servicing Arrangements

- 4.13 As noted above, the Mews houses will be serviced identically to the C1 units proposed in the main building. This is set out within the Waste Statement produced by Shu Architects; however, the main elements of note have been set out again below:
- 4.14 Refuse from each room will be collected daily by staff and transported to the secure communal bin store located at the rear of the site, out of sight of the public realm. The bin store arrangement is contained on the Proposed Site Plan. The store will be enclosed by a 1.8m slatted timber fence.
- 4.15 The refuse and recycling bins will be moved to the holding area next to the Whiteladies Road pavement on scheduled collection days by a staff member from the operating company. This area is where the existing waste from the offices is picked up. The landlord will coordinate with the Refuse Management section at Bristol City Council to ensure timely collection. After the waste has been collected, the bins will be promptly returned to the refuse storage area.

Energy & Sustainability

- 4.16 This application also seeks the installation of a number of renewable energy technologies. PV panels are proposed across the roof of the main building. This amounts to 36 no. 440W Photovoltaic arrays, positioned on the east and west roof slopes.

Trees & Landscaping

- 4.17 As detailed within the suite of plans which has been submitted with this application, the rear parking court of 11-13 Whiteladies Road is proposed to be reimagined as a landscaped area with paths allowing for easy movement between the bin store, Annexe, main building and bike store. This landscaping will include grassy areas and will also be accompanied by five new trees.

5 KEY PLANNING CONSIDERATIONS

Principle of Development

New (C1) Short Term Let Delivery

- 5.1 This application seeks permission for the change of use of the rear portion of the site from a current office to a C1 guest house/hotel use. This proposal aligns with application ref: 25/11594/F currently under determination with Bristol City Council. As was the case with the main frontage 11-13 Whiteladies Road building, this proposed use constitutes a commercially viable use for the site.
- 5.2 The principle of the guest house use (C1) in planning terms is acceptable in this location. The application site is within the defined city centre of Bristol and within close proximity to the Primary Shopping Frontages along The Triangle and Park Street. It is also close to significant public green space such as Brandon Hill and the Royal Fort Garden. A guest house use is defined by the NPPF as a town centre use, and therefore the site's proposed use is suitable for this area.
- 5.3 Policy BCS2 acknowledges the City Centre's role as a regional hub for a variety of uses, including tourism. It supports the encouragement and retention of facilities and services that enhance the diversity and vibrancy of the city. Additionally, Policies BCS7 and DM7 promote town centre uses within its area. Given that the application site is located within the designated City Centre and on the edge of a primary shopping area, it is supported in principle by Policies BCS2, BCS7, and DM7.
- 5.4 Finally, Bristol's planning policy BCAP10 sets out principal support for C1 hotel development within the city centre. It encourages the development of small-scale, boutique, or high-quality hotels. Whilst this proposal is not specifically a hotel, the development does fall within the C1 Use Class. The proposal is small-scale, boutique and will be high quality in its fit out, taking this into account it is considered that the application broadly aligns with the directive of policy BCAP10 and is appropriate in this location.

Loss of Office Use

- 5.5 Policy DM12 aims to protect employment sites, premises, and floor space outside the city's Principal Industrial and Warehousing Areas. It ensures that valuable employment sites are retained unless there is a strong justification for their loss, such as contributing positively to the mix of uses in the area or meeting other strategic objectives. DM12's explanatory text clarifies that the policy does not apply to employment sites in Bristol City Centre, however, Policy BCAP7 reiterates many of its major themes.
- 5.6 Policy BCAP7 Loss of Employment Space focuses on revitalizing vacant or outdated office buildings, located in areas with low demand for new office uptake. It states that:

'In Bristol City Centre, where there are existing office buildings that are vacant or underused by reason of their location or their ability to meet modern business needs (notably in and around the Nelson Street and Lewins Mead area), development involving the loss of existing office floorspace will be acceptable where it would contribute positively to the mix of uses in the area. Redevelopment or significant remodelling of the city centre's poorest quality

office buildings will be encouraged in preference to conversion, potentially including some further intensification of use.'

- 5.7 Whilst this proposal does relate to the change of use from an office use (Use Class E) to a residential-based use (Use Class C1), this change does not result in a total loss of employment at the site. The proposed use will require a number of employees at different levels to facilitate its successful operation, this will include receptionists, cleaners, site management and others.
- 5.8 This report, alongside Application ref: 25/11594/F has previously detailed the site's city centre location, the local area's commercial and historic significance, and its sustainable transport links. The site is well positioned to provide accommodation to tourists and employees working away from home who will both require access to the city centre but may wish to stay in accommodation with more services than a standard hotel room. Moreover, the dated office interior, combined with its lack of DDA compliance and accessibility issues, makes the existing site a less-than-optimal choice for potential office tenants.
- 5.9 A brief assessment of the collection of tourism-related uses currently in operation in the area is shown below. This assessment employed Bristol City Council's Pinpoint service to assess the prevalence of bars, nightclubs, restaurants, museums and theatres. Each symbol on the map below marks an individual establishment (it should be noted that general 'shops' are not shown below but they are also prevalent within the area). This demonstrates there is significant tourism and entertainment provision within the area.



Pinpoint map for uses in local area

- 5.10 Taking the above into account, it is considered that the provision of a C1 use would make a positive contribution to the vitality and economy of the area by allowing a greater amount of choice of

accommodation to potential future visitors of Bristol. In this regard, BCAP7's requirements for development involving the loss of office floor space are considered to have been met.

- 5.11 One final consideration to be noted in relation to Policies DM12 and BCAP7 is the changing national position around the Use Class Order. From the 1st September 2020, the Use Class Order 1987 was significantly amended. This change created new broader use classes such as Class E (combining retail, office, and other commercial uses), Class F1 (learning and non-residential institutions), and Class F2 (local community uses). This reorganisation removed previous classes such as A (retail), B1 (business), and D1/D2 (non-residential institutions and assembly/leisure). Importantly, these changes aimed to provide greater flexibility for repurposing buildings, especially in town centres and high streets, to better meet society's changing needs.
- 5.12 The changes listed above all came into effect well after the publication of BCC's Site Allocations and Development Management Policies (2014) and Bristol Central Areas Plan (2015). When considering this, adopted policies such as DM12 and BCAP7 should be afforded limited weight, given they no longer reflect the current national legislation or the government's new emphasis on flexibility.

The fallback position

- 5.13 Another material consideration which should be considered during the evaluation of this application is the presence of a fallback position. As detailed within Section 3 of this Statement, the subject main building and annexe at the site benefit from Prior Approval (ref: 25/10493/COU) for the change of use to 17 No. C3 residential dwellings pursuant to Schedule 2, Part 3, Class MA of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).
- 5.14 This extant Prior Approval is considered to constitute a legitimate fallback position in accordance with *Snowden V Secretary of State for the Environment [1980] JPL.749* and is therefore considered as a significant material consideration in the determination of this application.
- 5.15 The basic principle of the 'fallback' position is to consider and compare the development for which planning permission is sought with what the applicant can legitimately do with the subject land on the basis of the planning position as it stands without permission for the development which is now sought, so long as there is a realistic possibility of the 'fallback' position happening¹.
- 5.16 Further detail with regard to the 'possibility' was provided by Mr Justice Hickinbottom in *R (Zurich Assurance) v North Lincolnshire Council [2012] EWHC 3708* (Admin) who stated at para 75 of his judgement that: "...The prospect of the fallback position does not have to be probable or even have a high chance of occurring; it has to be only more than a merely theoretical prospect. Where the possibility of the fallback position happening is "very slight indeed", or merely "an outside chance", that is sufficient to make the position a material consideration (see *Samuel Smith Old Brewery (Tadcaster) v Secretary of State for Communities and Local Government [2009] EWCA Civ 333* at [20]-[21] per Sullivan LJ)"

¹ R (Zurich Assurance) v North Lincolnshire Council [2012] EWHC 3708 (Admin)

- 5.17 The matter was further considered by *LJ Lindblom in Mansell v Tonbridge and Malling Borough Council [2017] EWHC 2832* specifically with reference to Class Q Prior Approvals as the ‘fallback’ position, which in summary detailed:
- the basic principle is that for a prospect to be a “real prospect”, it does not have to be probable or likely: a possibility will suffice; &
 - the clear desire of the landowner to develop and maximise the value of the site is sufficient to demonstrate there was a “real prospect”.
- 5.18 With regard to the fall-back position, the submitted scheme would deliver significant improvements upon a consent which could be lawfully relied upon and implemented by the applicant. These improvements include:
- A new build, sustainable and highly efficient new block offering four additional accommodations.
 - Delivery of a host of new renewable energy sources.
 - External design improvements. (discussed below)
 - Provision of a boutique accommodation to visitors to the city, in a sustainable location.
 - Improvements to the building which were not securable via Prior Approval.
 - Additional landscaping
- 5.19 It is hoped that by highlighting this fallback position, the council will take note that this application is proposed to improve on an existing situation which has already been approved at the site through consent ref: 25/10493/COU.

Design and Heritage

- 5.20 Section 66 of the Planning (Listed Building and Conservation Areas) Act 1990 requires a Local Planning Authority to pay ‘special attention’ to the desirability of preserving and enhancing the character or appearance of a Conservation Area.
- 5.21 The NPPF places the onus on the applicant to describe the significance of any heritage assets affecting their development, and the level of detail provided should be proportionate to the assets’ importance (Para 200, NPPF).
- 5.22 Policy BCS22 requires that development proposals safeguard or enhance heritage assets and the character and setting of areas of acknowledged importance. This is supported further by DM31 which requires development that has an impact upon a heritage asset to conserve, and where appropriate, enhance the asset, or its setting. This policy position at a local level is consistent with the statutory duties imposed by Sections 66 & 72 of the Planning (Listed Building & Conservation Areas) Act 1990.
- 5.23 No buildings within the 11-13 Whiteladies Road address are listed; however, the site is covered by the Whiteladies Road Conservation Area designation. Whilst the main building at the site could be considered to hold some value within the setting of the conservation area, it is not considered that

the rear annexe offers any positive impact to the setting. To the contrary, its rudimentary design and appearance undermine the Conservation Area's character.

- 5.24 The Heritage Design and Access Statement produced by Shu Architects reviews the proposal's potential impact on the wider conservation area. It notes:

There are existing modern developments to the rear of the properties fronting Whiteladies Road, which includes the adjacent two-storey Prince Rupert House to the rear of no. 15 and the adjacent 3-storey office extension to the rear of nos. 7-9. We believe the massing and position of the proposal has been carefully considered and that the two-storey properties will have a neutral impact both on the adjacent Listed Building and the wider Conservation Area. We believe the proposed landscaping, which includes small trees, will have a positive impact on the wider Conservation Area, particularly when viewed from Tyndall's Park Road.

- 5.25 Given this conclusion, it is considered that the proposal does preserve, if not enhance, the character and setting of the Conservation Area, and therefore, Policy BCS22 and Policy DM13 are both accorded with.

Residential Amenity

- 5.26 Policy BCS18 of the Core Strategy states that development should provide sufficient space for everyday activities and enable residential units to be flexible to the changing life circumstances of occupants. Policy BCS21 states that development will be expected to safeguard the amenities of existing development and create a high-quality environment for future occupiers.

- 5.27 Given that this application only proposes limited external development, the potential for impacting neighbouring uses is limited. Notwithstanding this, the design has been carefully considered to ensure a high-quality environment for future occupants. In particular, the scheme provides the following:

- All proposed rooms are equipped with all the amenities expected within a short-term let guest house, these include a kitchen, bathroom, bedroom, laundry facilities and lounge areas.
- All bins will be collected from the rooms and deposited within the bin storage at the rear of the site so as not to create any amenity uses.
- Reception facilities at the entrance will provide guests with a clear route to assistance should it be required.
- Ample natural light and large windows for all rooms.
- Four private patios
- A private landscaped garden for the enjoyment of guests.

- 5.28 To conclude, future residents will enjoy a high standard of amenities within the site, and the proposal will not give rise to any adverse impacts on any existing residential or business use surrounding the site. Noting this, policies BCS18 and BCS21 are both considered to be accorded with.

Biodiversity and Green Infrastructure

- 5.29 Policy BCS9 – Green Infrastructure requires developments to incorporate new and/or enhanced green infrastructure of an appropriate type, standard and size. Policy DM15 reinforces this requirement by adding that ‘new green infrastructure assets will be expected to be designed and located to maximise the range of green infrastructure functions and benefits achieved, wherever practicable and viable.
- 5.30 The only green infrastructure on the site is a small hedge to the rear, within application ref: 25/11594/F, to improve this situation, a new hedge was proposed along the wall connecting the site with Whiteladies Road. This improved biodiversity and green infrastructure. Building upon this, this application proposes a large landscaping area alongside the planting of 5 new trees at the rear of the site. This is considered to significantly enhance the biodiversity and green infrastructure provision at the site and therefore is considered to accord with Policies BCS9 and DM15.
- 5.31 A BNG Exemption Statement is provided within this application. It confirms that the proposal will not impact more than 25m² of habitat and is therefore exempt from BNG requirements and planning conditions under the de minimis rule of Section 4 of The Biodiversity Net Gain Requirements (Exemptions) Regulations 2024.

Highways

- 5.32 Policy BCS10 of the Core Strategy states that development should be located where sustainable travel patterns can be achieved with higher density mixed-use development at accessible centres and along or close to main public transport routes. Policy DM23 of the Development Management Policies outlines that development should not give rise to unacceptable traffic conditions or highway safety impacts. Policy DM32 requires that all new developments must include shared recycling facilities and refuse bins with adequate capacity to accommodate the needs of the development.
- 5.33 The proposed development is sustainably located and served by suitable cycle parking and refuse facilities. Full details can be found in the Waste Statement by Shu Architects, submitted with this application. It should be noted that:
- The site has two access routes, both via Whiteladies Road.
 - Whiteladies Road is a significant transport route through the north of Bristol City Centre.
 - There are several public transport options available within proximity of the site, including bus stops and other forms of sustainable transport such as electric scooters, public bicycles and Clifton Down train Station within a 10-minute walk (this can give access to Bristol Temple Meads and the national rail network).
 - Application ref: 25/11594/F which is currently under determination with Bristol City Council, proposes 8-cycle spaces have been delivered through 4 no. Sheffield cycle stands within a secure enclosure at the rear of the site, and one Sheffield stand at the front of the site for visitors. This far exceeds the minimum cycle parking standards detailed within Appendix 2 of

BCC's Site Allocations and Development Management Plan, and is sufficient to also support the proposed four short-term let Mews houses as well.

- The proposed units will also be serviced by 6 car parking spaces (1 disabled space). This is in excess of the minimum car parking requirements detailed within Appendix 2 of BCC's Site Allocations and Development Management Plan.
- A secure refuse store and garden store has been located at the rear of the site.

Energy and Sustainability

- 5.34 Policies BCS13, BCS14 and BCS15 of the Core Strategy relate to sustainability issues and tackling climate change. Of note, Policy BCS14 sets out a hierarchy for heating, cooling and hot water supply for new developments. It also seeks to ensure that new developments incorporate sufficient renewable energy generation measures to reduce carbon dioxide emissions from residual energy use by at least 20%.
- 5.35 The policy requirements have been taken into account throughout the early design stages of this development. In accordance with the Heat Hierarchy, 36 PV panels are proposed to supplement and reduce electricity demand. It is considered that, given the scale of the proposed development, the delivery of this form of renewable technology at the site is sufficient to accord with the requirements of Policies BCS13, BCS14 and BCS15.

Drainage

- 5.36 BCS16 focuses on flood risk management; however, the site does not fall within a designated area of flood risk, so no action is required. It should also be noted that as the site is almost entirely hard standing and the proposal seeks to both reduce the footprint print the existing annexe and also introduce a variety of green infrastructure. Noting this, it is not considered that a Sustainable Drainage Strategy is required for this application to be approved.

CIL

- 5.37 In accordance with the Bristol City Council Community Infrastructure charging schedule, hotels are to be charged at £70/m². The existing annexe has been occupied for at least 6 continuous months across the last 3 years. Details can be provided on request. As a result, the site as a whole is considered to pass the CIL vacancy test, and CIL should therefore only be payable on the net additional floorspace arising from the development.
- 5.38 The following measurements are relevant:
- Annexe Proposed GIA = $76.7 \times 4 = 306.8\text{m}^2$
 - Annexe Existing GIA = 214m^2
 - Garden Store + Bike = 24.4m^2
 - Bin Store has no roof, therefore not required for CIL.
- 5.39 A completed CIL Form will be submitted alongside this application. This document will cover the CIL contribution required.

6 SUMMARY & CONCLUSIONS

- 6.1 This Planning Statement has been prepared on behalf of Urban Creation (11-13 WLR) Ltd, the site owner and applicant. It supports a full planning application for the demolition of the rear annexe (currently in Use Class E) and development of four short-term let Mews Houses (Use Class C1) and associated landscaping and other works.
- 6.2 This application has been made following the approval of a Class MA Prior Approval application and a supporting external works application for the change of use from Use Class E (office) to Use Class C (dwelling houses) (Application Refs: 25/10493/COU and 25/10495/F).
- 6.3 This statement demonstrates that the provision of Short-term let / guest house units at the site will contribute positively to the mix of uses in the area and therefore the change of use from office to C1 is considered acceptable.
- 6.4 Policy BCAP10, which focuses specifically on C1 hotel development, encourages the development of small-scale, boutique, or high-quality hotels. Whilst this application does not propose a hotel and thus it cannot be entirely compliant, the application does propose a C1 use, which is aligned with the policy strategy.
- 6.5 The proposed redevelopment of the rear annexe responds well to the main 11-13 Whiteladies Road site and the surrounding built environment. This proposal offers a positive reimagination of an underused city centre asset.
- 6.6 The site is found to be highly sustainable, being located within minutes of substantial public transport options. Additionally, the additional units can all be catered for via the previously proposed cycle and car parking put forward through application ref: 25/11594/F.
- 6.7 The proposed development is therefore found to be highly sustainable and in accordance with the Development Plan. When taking into account all other material considerations, including national planning policy, the proposed development should be supported and approved without delay.



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