



Planning Statement

144 Whitehall Road, Redfield, Bristol BS5 9BP

Prepared by: Nimble Planning and Development
Applicant: Duncan Blackmore
Description: Change of use of betting shop (Sui Generis) to create a two-bedroom flat (use class C3) including external alterations, bin and cycle storage.
Date: 31 July 2025



SUMMARY

- Existing mixed use site, betting shop with first floor flat;
- Now proposed to convert betting shop to residential, creating a two-bedroom flat;
- Existing first floor flat retained unaffected by development;
- Loss of betting shop will benefit the local community, improving negative impacts to health and crime associated with gambling use;
- Development will not cause loss of 'important service to the local community' given betting use, therefore no conflict with Policy BCS7;
- The site is nearby St George town centre Church Road, a short walk from bus stops and St George Park, providing an accessible and sustainable location for a new dwelling;
- The development includes numerous external alterations which reverse detrimental aspects of the existing commercial use, improving the contribution of the site to the local area;
- The proposed external alterations will be in keeping with and enhance the traditional Victorian character of the area;
- No extension or enlargement of building proposed, which will preserve the amenity of neighbouring residents;
- The new flat would fully comply with national space standards and be dual aspect, providing a high standard of amenity for future residents;
- The development will incorporate cycle parking, bin and recycling storage for the proposed dwelling;
- The development incorporates energy efficiency measures and renewable technology to improve sustainability in accordance with policies BCS14 and BCS15; and overall
- The development delivers additional housing for which Bristol has severe local need, on a brownfield site in a sustainable location, in a format that will improve the character of the area. The development accords with all relevant policies and guidance, and should be supported.

CONTEXT



1879 - 1888 Bristol Town Plans - Know Your Place, Bristol

Site Background

The site is located to the southern side of Whitehall Road, Redfield. It contains a two-storey end of terrace mixed-use building positioned at the corner of Whitehall Road and Victoria Parade.

The building dates from the late 19th Century Victorian era and is included on the 1879-1888 Bristol Town Plans (see image above). The building features a hipped roof clad with red clay style concrete tiles. The walls are constructed with local pennant stone in square split faced masonry. Windows feature painted stone dressings.

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The principal frontage is faces north onto Whitehall Road. The building also has a secondary return frontage facing west onto Victoria Parade. A two-storey extension with flat roof is located at the rear, before a small rear yard area. The rear extension was constructed in the early 1990s (see application: 92/01609/F).

The ground floor is a commercial unit used as a betting shop (Sui Generis). The betting shop use has been established for more than 20 years, previously 'Coral' and now 'Betfred'.

The first floor is a two-bedroom flat (use class C3) accessed via entrance in the rear extension from Victoria Parade.

The site is located between the Whitehall and Redfield neighbourhoods of inner east Bristol. Whitehall Road itself is a secondary arterial route from the Lawrence Hill roundabout (A4320) out to the Avon ring road (A4174) via Kingswood. Whitehall Road is served by two bus services (route nos. 6 and 7) with stops located around 150m both east and west. St George (Church Road) Town Centre is located 300m south at the opposite end of Victoria Parade. St Georges Park is 400m east of the site. Devon House (no. 123 Whitehall Road) to the north-west and no. 114 Whitehall Road to the west are Grade II listed buildings.



Planning History

Application reference:	Development:	Decision:
25/10648/F	Change of use of betting shop (Sui Generis), roof alterations, extension and external alterations to create 1 no. commercial unit (Class E), 2 no. additional flats (Class C2) together with the internal reconfiguration of the existing first floor flat	Appeal against non-determination - Decision pending
25/10614/F	Conversion of ground floor betting office (Sui Generis) to create retail unit (Class E) and self-contained apartment (Class C3)	Appeal against non-determination - Decision pending
92/01609/F	Internal/external alterations to shop premises; First floor flat over; Second storey extension; External staircase	Granted – 28 September 1992



Historic image of 144 Whitehall Road in commercial use

PROPOSALS

The application seeks full planning permission for the proposed change of use of the betting shop (Sui Generis) to create a ground floor two bedroom flat (use class C3) including external alterations, bin and cycle storage.

The development involves external works including repair and restoration of the bay window to the east of the front elevation. This is currently boarded associated with the betting shop. Windows and cornices would be reinstated. The shopfront, commercial entrance, existing signage and shutters, shall be replaced with timber period style shopfront obscure glazed at lower level, tiled stall riser, timber signage board, cornice and conservation style sliding sash window. The low boundary wall between the site and Whitehall Road shall be reinstated, finished with render, coping stones and metal railings.

A secure cycle parking store and dedicated bin and recycling box store shall be introduced in the front garden area, located behind proposed boundary wall. The arrangement would be similar to the neighbouring property, no. 146 Whitehall Road.

The proposed flat would be a two bedroom, three person dwelling, comprising a double and a single bedroom. The flat would be accessed via a new entrance in the west elevation from Victoria Parade. The flat would have internal floor area totalling 62m² and bedrooms would measure 12m² and 10m² respectively.

An open plan kitchen, living, dining room would be located at the front of the building, benefitting from large, former shopfront windows. The bathroom is located at the rear, adjacent to the stairs accessing the first floor flat.

The first floor flat which has separate access would be retained unaffected by the development. This development relates to the ground floor only.

RELEVANT POLICY & ISSUES

Section 38(6) of the Planning and Compulsory Purchase Act 2004, section 70(2) of the Town and Country Planning Act 1990 and para. 2 of the National Planning Policy Framework:

Require applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.

National Planning Policy Framework (2024)

Must be taken into account in preparing the development plan, and is a material consideration in planning decisions.

Development Plan incorporating:

Bristol Core Strategy (2011)

- Policy BCS3 (Northern Arc and Inner East Bristol - Regeneration Areas)
- Policy BCS5 (Housing Provision)
- Policy BCS7 (Centres and Retailing)
- Policy BCS10 (Transport and Access Improvements)
- Policy BCS14 (Sustainable Energy)
- Policy BCS15 (Sustainable Design & Construction)
- Policy BCS18 (Housing Type)
- Policy BCS20 (Effective and Efficient Use of Land)
- Policy BCS21 (Quality Urban Design)
- Policy BCS23 (Pollution)

Site Allocations and Development Management Policies Local Plan (2014)

- Policy DM2 (Residential Sub-divisions, Shared and Specialist Housing)
- Policy DM7 (Town Centre Uses)
- Policy DM10 (Food and Drink Uses and the Evening Economy)

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- Policy DM14 (Health Impacts of Development)
- Policy DM23 (Transport Development Management)
- Policy DM26 (Local Character and Distinctiveness)
- Policy DM27 (Layout and Form)
- Policy DM28 (Public Realm)
- Policy DM30 (Alterations to Existing Buildings)
- Policy DM32 (Recycling and Refuse Provision in New Development)
- Policy DM33 (Pollution Control, Air Quality and Water Quality)

Adopted Local Supplementary Planning Guidance:

Bristol Urban Living SPD (2018)

Bristol Space Standards Practice Note (2021)

Bristol Climate Change and Sustainability Practice Note (2020 + 2023 Addendum)

Bristol Transport Development Management Guide (TDMG)

DISCUSSION

IN PRINCIPLE ACCEPTABILITY OF CHANGE OF USE

Loss of Existing Use

144 Whitehall Road is a mixed-use site outside of any centre designated under local planning policy. The site is one of a series of sporadic historic commercial uses on this section of Whitehall Road, serving the adjacent mid density traditional Victorian terraced residential streets.

Policy BCS7 (Centres and Retailing) of the Core Strategy states that:

“Local shopping and service provision in smaller frontages or single shops away from the identified centres should be retained where it remains viable and provides an important service to the local community. The provision of new small scale retail facilities will be encouraged where they would provide for local needs and would not be harmful to the viability and diversity of any nearby centres.”

The application seeks permission for change of use of the existing betting shop (Sui Generis) to create a new two-bedroom flat (use class C3) at ground floor level. The development would result in loss of the existing betting use.

The betting shop is not considered to provide “important service to the local community”. There is a wealth of evidence linking gambling and negative effects for communities including impact on wellbeing, mental health, other health and social outcomes. There is also evidence linking betting shops with crime and negative consequences for communities (see [Analysing the effect of betting shops on crime in England](#)¹ by Oluwole Adeniyi, 2021).

Taking account of such evidence, change of use of the betting shop would not cause the loss of a service or facility that is important to the local community. Evidence and research support the conclusion that loss of the betting shop would likely benefit the community in terms of reducing access to gambling, improving health and wellbeing as well as decreasing crime correlations with this land use.

It is highlighted that the public consultation process on recent application: 25/10614/F at the site, returned 1 response which supported change of use. The member of the public stated:

<https://www.tandfonline.com/doi/full/10.1080/00343404.2022.2159355#d1e2603>

"Fully support change of use of commercial unit, as betting shop detracts from local area and does not benefit community. Great to see retention of local commercial unit whilst also providing housing, which will improve what is currently an eyesore in the area".

Bristol City Council has not objected to loss of the betting shop under either recent application. It is evident that the community do not object and there is some support for loss of the betting shop following recent applications.

The Applicant's position is that loss of the betting shop would be a benefit for the local community associated with the development which carries weight in assessment. For example, the associated benefits for health and wellbeing receive policy support through compliance with Policy DM14 (The Health Impacts of Development) of the Site Allocations and Development Management Policies Local Plan. There is no policy reason to resist loss of a betting shop.

The proposals to remove a gambling facility accord with aspirations to create a safe and healthy city where development contributes to reducing the causes of ill health, improving the health and wellbeing of the local population and reducing health inequalities. Therefore, loss of the existing betting shop accords with development plan policy.

The betting shop is not an important service to the local community as evidenced by both public consultation on recent applications, academic evidence and the recent position of the Council itself. Consequently, the development will not conflict with Policy BCS7.

Acceptability of Residential Use

Local Planning Authorities are required by Section 5 of the National Planning Policy Framework (NPPF, 2024) to ensure they plan for and deliver a sufficient number of homes in their area to meet local needs.

Bristol is required to demonstrate a housing land supply in accordance with para. 78 of the NPPF and cannot currently demonstrate a minimum five-year supply of deliverable housing sites. The Council is also currently subject to the requirement to prepare a housing delivery action plan.

Planning appeal decision reference: ref: APP/Z0116/W/24/3348521, 52 St. Johns Lane, Bedminster, Bristol BS3 5AD from February 2025 refers to a demonstrable housing land supply of 3.54 years in Bristol.

In accordance with para. 11 of the NPPF and footnotes, this means that the policies which are most important for determining the application (e.g. the strategic housing policies) are out-of-date and therefore permission should be granted unless:

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1. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or
2. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

None of the protected areas or assets (Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority); irreplaceable habitats; designated heritage assets etc.) referenced at footnote 7 apply to 144 Whitehall Road.

Therefore, proposals for housing should be approved unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole. This is otherwise known as the 'tilted balance'.

Despite being out-of-date, the Council's strategic housing policies are BCS3 (Northern Arc and Inner East Bristol - Regeneration Areas) and BCS5 (Housing Provision) of the Core Strategy.

The site is within Easton ward which forms part of the Inner East regeneration area planned for by spatial Policy BCS3. The policy identifies that in the Inner East the emphasis will be on:

- Retaining employment sites and supporting centres;
- Ensuring a mix of new housing to meet local needs;
- Encouraging development which provides a mix of uses.

It is noted that development in the Inner East Regeneration Area will include the provision of around 2,000 new homes.

Policy BCS5 of the Core Strategy also plans for a total of 26,400 homes city-wide by 2026, with 4,200 on small unidentified or windfall sites citywide.

The development would create an additional two bedroom dwelling that would contribute positively to local housing targets. This accords with the need for new housing identified in the Inner East regeneration area and windfall targets. The proposals are compliant with objectives set out in local strategic housing policies.

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Para. 73 of the NPPF states that: "Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly."

This is one such example of a small site where the benefits of housing could be delivered in a short space of time. The works associated with creation of an additional home are very minor. The speed and ease of delivery of housing associated with this particular development should receive added weight in assessment given the urgent need for housing in Bristol.

Policy BCS20 (Effective and Efficient Use of Land) of the Core Strategy states that new development will maximise opportunities to re-use previously developed land.

Where development is planned opportunities will be sought to use land more efficiently across the city. Imaginative design solutions will be encouraged at all sites to ensure optimum efficiency in the use of land is achieved. Higher densities of development will be sought:

- In and around the city centre;
- In or close to other centres; and
- Along or close to main public transport routes.

For residential development a minimum indicative net density of 50 dwellings per hectare will be sought.

Para. 125 of the NPPF requires that planning decisions should:

"give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused".

The scheme involves increasing residential densities to deliver an additional home on brownfield land by sensitively adapting an existing building. The site is located only 300m from St George (Church Road) Town Centre and Whitehall Road is served by two bus services (route nos. 6 and 7) with stops located 150m east and west.

Therefore, the site is close to designated centres including shops and facilities, in addition to being located on a main public transport route. This accords with Policy BCS20 and therefore new development in this area should maximise opportunities for re-use of previously developed land, employing imaginative design solutions to optimise density. As will be set out, the scheme directly accords with this objective.

The BrisTAL (Bristol Transport Access Level²) score for the site is 6a, the second highest level (with 0 worst and 6a/6b the best), demonstrating very good accessibility by public transport. Residents in this area would be actively encouraged by way of convenience to use sustainable transport modes and achieve sustainable travel patterns.

Proximity to St. George Town Centre and position on two bus routes will minimise the need to travel, especially by private car, and maximise opportunities for the use of walking, cycling and public transport. This directly accords with objectives set out in Core Strategy Policy BCS10 (Transport and Access Improvements).

At a personal social level, the development will provide an additional good quality home, making a significant difference to the lives and livelihoods of up to 3 future residents. This social benefit should also be given weight as a defined benefit of development when deciding the application.

The proposals are for a smaller housing type (two bedroom flat) that includes an independent entrance, with no communal areas, meaning residents will avoid needing to pay expensive management and maintenance fees. This further improves the affordability of the proposed dwelling at a personal social level and the need for affordable types of housing is widely recognised. This affordability benefit of the housing type proposed is a valid material consideration weighing in favour of the scheme.

Taking account of numerous social, environmental and economic benefits of development, the threshold for adverse impacts needed to outweigh benefits is high. Substantial weight must be given to the value of using brownfield land within the city to meet identified severe housing need. National and local strategic policy weighs in favour of development unless adverse impacts and substantial harm is posed. The following sections shall demonstrate that adverse impacts and substantial harm will not occur.

Appearance, Character & Design

Policy BCS21 (Quality Urban Design) of the Core Strategy states that: “New development in Bristol should deliver high quality urban design. Development in Bristol will be expected to:

- Contribute positively to an area’s character and identity, creating or reinforcing local distinctiveness.
- Deliver a coherently structured, integrated and efficient built form that clearly defines public and private space.

² <https://maps.bristol.gov.uk/pinpoint/> - Local Information/Transport and Streets/BrisTAL

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- Deliver a safe, healthy, attractive, usable, durable and well-managed built environment comprising high quality inclusive buildings and spaces that integrate green infrastructure.
- Create a multi-functional, lively and well-maintained public realm that integrates different modes of transport, parking and servicing.
- Safeguard the amenity of existing development and create a high-quality environment for future occupiers.
- Promote diversity and choice through the delivery of a balanced mix of compatible buildings and uses.

Policies DM26 (Local Character and Distinctiveness), DM27 (Layout and Form), DM28 (Public Realm) and DM30 (Alterations to Existing Buildings) of the Site Allocations and Development Management Policies Local Plan are also relevant.

144 Whitehall Road dates from the late 19th Century Victorian era and is included on the 1879-1888 Bristol Town Plans. The building has a hipped roof clad with red clay style concrete tiles. The walls are constructed with local pennant stone in square split faced masonry. Windows feature painted stone dressings.

The building is an end-of-terrace site, located at the corner of Whitehall Road and Victoria Parade. Whitehall Road has a mixed commercial and residential character. Whilst there have been many 20th and 21st century additions, the areas Victorian layout, building types, scale, form and some traditional building materials remain legible.

The condition of 144 Whitehall Road has deteriorated associated with the existing betting shop use. The bay window has been boarded over and subject to flyering. The boundary wall has been removed and the front yard area has not been maintained, has been used informally for customer car parking, with the concrete surface in poor condition. Commercial bins have no defined storage area or enclosure and detract from environmental amenity. Metal commercial signage and security roller shutters are negative features detracting from Victorian character. See image beneath for reference.

The proposals have been designed to sensitively accommodate residential redevelopment, in a manner which reverses the aesthetic and environmental harm posed by existing commercial use and respond positively to Victorian character. Residential use will lead to more attentive occupiers and better ongoing maintenance of the site.

The development firstly seeks to restore a low front boundary wall on the curtilage with Whitehall Road. This will reintroduce a continuous boundary treatment, providing a clearer division of public and private land, which will appear more inkeeping with the pattern and

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character found further east on the street. This will screen of proposed bin stores and allow better management and maintenance of land to the front of the site. These works offer significant betterment in comparison to the current context. The new wall, bin and bike stores will also prevent parking on the site frontage which is currently an issue associated with opportunistic customers of the betting shop. These works offer significant betterment in comparison to the current context, as demonstrated in the image beneath.



The existing bay window to the east will be refurbished, boarding removed and glazing restored, returning an active frontage to Whitehall Road. This will reintroduce natural surveillance over this part of the street. When associated with the current commercial use which is vacant overnight, the existing situation fails to provide surveillance at times when crime and fear of crime are highest. Change of use and introduction of residential windows to the front of the site will provide increased public surveillance, contributing to a safer and more welcoming townscape adjacent to the site.

The proposals will remove existing unsightly commercial bins and metal box advertisement signs. The works will also remove security roller shutters. This will be replaced by a timber glazed frontage, composed of pilasters, fascias and a cornice, retaining the former commercial character, whilst sensitively updating this for residential use. A new sash window will replace the entrance door, recalling historic Victorian character.

Overall, through relatively minor interventions, the scheme reverses a series of aesthetic issues associated with the existing commercial use, enhancing the appearance of the site and sensitively adapting the building to accommodate a new ground floor flat. The proposals balance the Applicant's desire to remove the detrimental use and make more efficient use of the site, whilst enhancing Victorian character and addressing current visual and environmental issues that detract from the character of the area. The proposals include several aspects of urban design that will deliver betterment for the streetscene and local community, including improved boundary treatment, increased public surveillance, improved management of bins, removal of unsightly commercial elements and reintroduction of traditional Victorian design and materials. These aspects directly accord with Policy BCS21 of the Core Strategy and Policies DM26, DM27, DM28 and DM30 of the Site Allocations and Development Management Policies Local Plan.

Neighbouring Amenity

Policy DM30 (Alterations to Existing Buildings) of the Site Allocations and Development Management Policies Local Plan requires that extensions and alterations to existing buildings will be expected to safeguard the amenity of the host premises and neighbouring occupiers.

The proposals involve no extensions or enlargement of the building. Therefore, daylight, sunlight, outlook and privacy in neighbouring homes will be unaffected by the development, and therefore safeguarded.

The change of use and subdivision will create a new dwelling within the existing betting shop. This change is inkeeping with neighbouring land uses and likely to generate comparable impacts for amenity as adjacent land uses. Residential use by a two-bedroom, three person dwelling is likely to generate less noise and activity than the betting shop would. Therefore, this development is likely to have a negligible effect on neighbouring amenity.

Overall, the development will have a limited effect on neighbouring amenity as it involves change of use of a commercial use to less intensive residential use, with no extension of the building. The Applicant is willing to accept any planning conditions deemed necessary by the decision maker to manage the proposed residential use. Subject to such measures, the development will preserve current levels of amenity for neighbouring sites in accordance with the requirements of Policy BCS23 of the Core Strategy and Policy DM30 of the Site Allocations and Development Management Policies Local Plan.

Future Residents Amenity

Policy BCS18 (Housing Type) of the Core Strategy states that residential developments should provide sufficient space for everyday activities and to enable flexibility and adaptability by meeting appropriate space standards.

Policy BCS21 (High Quality Urban Design) of the Core Strategy seeks to create a high-quality environment for future occupiers.

Policy DM29 (Design of New Buildings) of the Site Allocations and Development Management Policies Local Plan states that new residential development should provide dual aspect where possible, particularly where one of the aspects is north-facing.

The Bristol Space Standards Practice Note (2021) states that Bristol City Council applies the Nationally Described Space Standard (NDSS) as the appropriate space standard for residential developments.

The development will create a two bedroom, three person dwelling. This size and type of accommodation is required by the NDSS to provide a minimum of 61m² GIA. Bedrooms must be 11.5m² if double bedrooms and 7.5m² if single bedrooms.

The proposed flat would achieve internal floor area of 62m². It therefore exceeds the NDSS requirement for a two bedroom, three person dwelling. Both bedrooms meet the minimum NDSS area requirements, with the single bedroom achieving 10m², thereby significantly exceeding the minimum size requirement for a single bedroom.

The plans demonstrate the flat will include sufficient space for a good sized open plan kitchen, living and dining area. There is sufficient space for 3 occupants to cook, eat, socialise and unwind in this room. The room benefits from large windows on two aspects which will provide good access to natural light and outlook from the room. There is sufficient space for everyday living for 3 people.

The flat exceeds 2.3m in height throughout and the development is fully compliant with NDSS requirements for floor to ceiling height. The apartment will feel spacious and comfortable as a result of good ceiling heights.

The proposed dwelling is a smaller type of housing, however there is need for smaller types of housing considering housing affordability issues. This type of housing will meet the needs of many groups often underserved by other developments.

The dwelling provides an acceptable level of space to provide sufficient and acceptable standards of amenity for all reasonable day to day needs. The dwelling is also dual aspect,

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benefitting from a bay window to the north and further bedroom window to the south west. The proposed windows will provide good levels of light, outlook and enable natural cross ventilation. The site is a short walk from St Georges Park providing access to public open space for outdoor recreation.

Overall, the dwelling accords with relevant space standards, is a reasonable size and has good light, outlook and ventilation. The development meets policy objectives for provision of high-quality environment for future occupiers.

Access, Transport & Highways

Policy BCS10 (Transport and Access Improvements) of the Core Strategy states that:

"Development proposals should be located where sustainable travel patterns can be achieved, with more intensive, higher density mixed use development at accessible centres and along or close to main public transport routes. Proposals should minimise the need to travel, especially by private car, and maximise opportunities for the use of walking, cycling and public transport."

Policy BCS20 (Effective and Efficient Use of Land) of the Core Strategy states that:

"New development will maximise opportunities to re-use previously developed land."

"Where development is planned opportunities will be sought to use land more efficiently across the city. Imaginative design solutions will be encouraged at all sites to ensure optimum efficiency in the use of land is achieved. Higher densities of development will be sought:

- In and around the city centre;
- In or close to other centres;
- Along or close to main public transport routes".

The site is located between Whitehall and Redfield neighbourhoods in inner east Bristol. The site is only 300m from St George (Church Road) Town Centre and Whitehall Road is served by two bus services (route nos. 6 and 7) with stops located around 150m both east and west.

The BrisTAL (Bristol Transport Access Level) score for the site is 6a, the second highest level (with 0 worst and 6a/6b the best), demonstrating very good accessibility by public transport. Residents in this area would be actively encouraged by way of convenience to use sustainable transport modes and achieve sustainable travel patterns.

Proximity to the St. George Town Centre and position on two bus routes will minimise the need to travel, especially by private car, and maximise opportunities for the use of walking,

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cycling and public transport. This directly accords with objectives set out in Core Strategy Policy BCS10 (Transport and Access Improvements).

The site will therefore be located within walking distance of a wide range of shops and services. These will provide future residents with many of the facilities and provisions necessary for day-to-day living, without travelling significant distances. It would be a short and convenient walk for most people to reach these. Therefore, residential development in this location, which has excellent access to local services, will comply with Policy BCS10 objectives of locating development where sustainable travel patterns can be achieved.

When the need to travel further afield arises, for example for work, education or leisure, there are public transport services available a short walk to bus stops in either direction on Whitehall Road. It is around 20 minutes journey time to Bristol city centre on either of these routes.

Lawrence Hill railway station is also around 10 minutes walk away, providing rail access to Bristol Temple Meads, other suburban stations and the wider national rail network.

Public transport services as well as cycling and micro mobility modes will offer residents viable and attractive options for travel to/from the site using active and low carbon modes. The development incorporates a secure cycle parking store for the proposed flat, improving the range of options for sustainable transport by residents. Cycle parking has level access, will be weather tight and secure. It will be comparable to existing facilities at the neighbouring property to the east (no. 146 Whitehall Road). The design has been based on the Council's published Transport Development Management Guide (TDMG) Design Guidance. Full details can be secured by condition if necessary.

This will ensure that residents living in this location would not be dependent on private car use. Availability of a good range of alternative transport options will likely de-incentivise private car use, reducing emissions and congestion.

The proposals also incorporate good sized bin and recycling stores for the proposed flat. This will also represent betterment on the existing situation and full details can be secured by condition if necessary. The proposals comply with Policy DM32 (Recycling and Refuse Provision in New Development).

On the whole, residential development at this location will minimise the need to travel, especially by private car, and maximise opportunities for the use of walking, cycling and public transport. The location is a sustainable one for housing development and accords with the principles of Policies BCS10 and BCS20.

Sustainability & Energy

Policies BCS14 (Sustainable Energy) and BCS15 (Sustainable Design & Construction) of the Core Strategy and the Climate Change and Sustainability Practice Note (including June 2023 Addendum) set out the local requirements for sustainable construction and energy efficient design.

Policy BCS14 requires developments demonstrate reductions in carbon emissions by:

1. Minimising energy requirements;
2. Incorporating renewable energy sources;
3. Incorporating low-carbon energy sources.

Heating and hot-water systems should be specified in accordance with the heat hierarchy and at least a 20% saving in CO2 emissions from energy uses should be achieved through on-site generation of renewable energy.

The sustainable design and construction requirements of Policy BCS15 should also be addressed.

A separate Energy Strategy and Sustainability Statement has been prepared demonstrating how the development addresses these requirements. Full compliance with Policies BCS14 and BCS15 can be secured by planning condition.

Ecology & Biodiversity

The proposals are for change of use and minor external alterations at an urban site that has no existing habitat. The majority of the site is developed and remaining areas are hardstanding. The site therefore falls under the 'de minimis' exemption for biodiversity net gain as the development will impact less than 25 square metres of onsite habitat and there is no priority habitat at the site.

CONCLUSION

This scheme seeks to reconfigure and rejuvenate an existing betting shop, making more efficient use of brownfield land to meet urgent and critical need for housing in Bristol. Loss of the betting shop will benefit the community through restricting the negative consequences of gambling and crime associated with the commercial use. The scheme will repurpose the existing building to create a new two-bedroom flat, on a brownfield site where national policy requires substantial weight is given to benefits of reuse of suitable sites to meet the identified need for housing. The location is perfect for additional housing due to being a short walk from St George Town Centre at Church Road, St. Georges Park, nearby bus stops and in an area where sustainable travel patterns will be achieved.

The development includes several external alterations that will benefit the local area by improving the appearance and character of the site, including; removal of unsightly commercial signage, shutters and customer car parking, as well as reintroduction of traditional Victorian design and materials, reinstatement of a front boundary wall, increased public surveillance and improved management of bins.

The quality of proposed accommodation is good, fully compliant with the Nationally Described Space Standard, achieving good levels of light and outlook, accompanied. By dedicated cycle parking and bin store facilities. The dwelling will meet local policy requirements for high levels of energy efficiency and renewable energy, minimising carbon emissions and helping to mitigate the effects of climate change.

The proposals are in accordance with the Council's Core Strategy and Site Allocations and Development Management Policies Local Plan. The development is sustainable development, providing numerous social, environmental and economic benefits. Taking account of the local lack of five year housing land supply, it is required that housing development is approved unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. The development will not result in adverse impacts but even if some were identified, the limited level of harm is likely to be outweighed by other benefits such as meeting critical need for housing in a sustainable location, improvement of the character of the site and energy and sustainability enhancement of the building.

As the application is fully in accordance with both national and local policy, with respect it is requested to be considered for permission without delay.