



Planning Statement

144 Whitehall Road, Redfield, Bristol BS5 9BP

Prepared by: Nimble Planning and Development

Description: Change of use of betting shop (Sui Generis), extension and external alterations to create 2 no. additional flats (use class C3) as well as retention and internal reconfiguration of the existing first floor flat.

Applicant: Mr Duncan Blackmore

Date: 31 July 2025



SUMMARY

- Existing mixed use betting shop with upper floor flat;
- Proposals convert and extend building for residential use creating 2 no. additional flats;
- Loss of betting shop will benefit the local community, improving negative health impacts associated with gambling as well as crime associated with this 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, a short walk from bus stops and St George Park, providing an accessible and sustainable location for housing development;
- 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;
- Proposed roof extension and dormer windows are in keeping with the areas varied roofscape and appropriate for the corner plot location. Dormers are modest in scale and sensitively proportioned as well as a traditional design. The dormers are a significant enhancement on the design of others consented and built recently in the area;
- The development would safeguard the amenity of neighbouring residents accounting for existing conditions and extent of proposed extensions;
- The new flats provide sufficient space for everyday living and are dual aspect, providing a high standard of amenity for future residents;
- The development will incorporate cycle parking, bin and recycling storage for both existing and proposed dwellings, and remove existing car parking;
- The development will incorporate energy efficiency measures and renewable technology to improve the sustainability of the site 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
92/00518/F	Internal/external alterations to shop premises/first floor flat over; second storey extension; external staircase	Refused – 11 May 1992
86/03270/F	Installation of small satellite antenna for receive only purposes	Withdrawn – 17 March 1987



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), extension and external alteration of the building to create 2 no. additional flats (Use Class C3) in addition to internal reconfiguration of the existing first floor flat.

The existing betting shop is 61m². It is proposed to convert this to a 2 bedroom, 3 occupant dwelling with floor area of 59.5m².

At first floor level, the existing two-bedroom flat would be revised to become a one-bedroom flat. The revised layout is proposed to allow access to the roof level, where an additional second floor flat is proposed.

All flats would be accessed via separate entrances and upper floor flats would each have separate access stairs located at the rear of the building. The first floor flat would have floor area of 52m² and the second floor flat would have floor area of 44m². Both would be one-bedroom homes.

The new second floor flat requires alterations to the roof to achieve necessary headroom for a good standard dwelling. The roof form will be revised to have a steeper pitched roof. Dormer windows are proposed to the front and side elevation. These would be clad with lead and incorporate sash windows. The existing flat roofed rear extension would be replaced with pitched roof form. The proposed roof form would not exceed the height of the current ridge line.

The development would involve restoration and refurbishment of the ground floor bay window on the principal north elevation. The ground floor 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.

Bin and cycle storage for the ground floor flat shall be installed in the front garden, screened by front boundary wall. The existing car parking space will be removed from the rear yard and a sliding gate introduced on Victoria Parade. Bin and cycle storage for first and second floor flats will be located in the rear yard area, with access to/from Victoria Parade.



Existing vs Proposed Development - Whitehall Road



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)
- Policy DM14 (Health Impacts of Development)
- Policy DM23 (Transport Development Management)

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- 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 and 144A 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 the proposed change of use of the betting shop (Sui Generis), extension and external alterations to create 2 no. additional flats (use class C3) as well as internal reconfiguration of the existing first floor flat.

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>

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"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 a 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 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 proposals are for a residential development, delivering 2 no. additional dwellings 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."

Development at 144 Whitehall Road is an 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 the proposed 2 no. additional homes in this instance are relatively minor extension and alteration of an existing building. The speed and ease of delivery of housing associated with this development should receive added weight in assessment.

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 2 no. additional homes 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 2 no. additional good quality homes, making a significant difference to the lives and livelihoods of future occupiers. This social benefit should also be given weight as a defined benefit of development when deciding the application.

The proposals are for smaller 1 and 2 bedroom apartment housing types that all include independent entrances, with no communal areas, meaning residents avoid needing to contribute to expensive management and maintenance fees. This further improves the affordability of the scheme at a personal social level and the need for affordable types of housing is widely recognised by both the NPPF and local policy. This affordability benefit of the housing types proposed is a valid material consideration weighing in favour of the scheme.

The development would make more efficient use of the existing betting shop which makes a negative contribution to the community, replacing this with 2 no. additional homes in a location where sustainable travel patterns can be achieved. The development would also increase the net density of housing in the area, bringing this closer to the 50 dwellings per hectare target set out in Policy BCS18 of the Core Strategy.

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.

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

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.
- 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 varied 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 is subject to flyering. The boundary wall has been removed and the front yard area has not been maintained, is used informally for customer car parking and the concrete surface in poor condition. Commercial bins have no defined storage area or enclosure and detract from environmental amenity. Metal

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commercial signage and security shutters are negative features detracting from Victorian character. See image beneath for reference.

The development proposals have been designed to sensitively accommodate the residential redevelopment, respond positively to Victorian character, whilst addressing some of the current aesthetic and environmental issues. Residential use will lead to better ongoing maintenance of the site.

The development will reinstate 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 be consistent with the walls found further east on the street. This will repair an important aspect of traditional character and also provide screening of proposed bin/cycle stores and improved management and maintenance of land to the front of the site. The 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

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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.

At roof level, the upper floor flat requires a revised roof form with an increase in the pitch to achieve a more spacious living environment. This will replace the existing flat roofed rear extension. Dormer windows are proposed to the front and side roofs. These would be clad with lead flashing and contain sash style windows.

With regard to roof extensions and alterations, whilst there is consistency in the overall type of roofs found in the vicinity of the development site, the local roofscape is far from consistent. Roofs are predominantly pitched styles including traditional hipped and gabled forms, but have a wide variety of heights, pitch angles and fenestrations. There have also been various alterations over time. The aerial image beneath of the townscape east of the site demonstrates the varied roofscape that characterises the area.



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It is evident that the flat roof form of the existing rear extension is anomalous in the area. Conversion of this roof to a pitched style which is more in keeping will enhance the contribution of the building to the character of the area.



To highlight the variety of roof forms in the area, steep pitched roofs at the corners of Gerrish Avenue/Cooksley Road and Gilbert Road, as well as corner plots on Albert Parade are noted. The images above provide examples of these roofs a short walk from the site on less trafficked routes.

These examples illustrate that traditional buildings in the area, particularly corner plots, frequently include steeper pitched roofs. This is a format that has been used historically in the area to optimise density and accommodate additional development in tightly knit inner urban terraced streets.

It is also highlighted that corner plots in the vicinity frequently accommodate increased height, scale and massing. The recent developments at the corners of Whitehall Road and Woodbine Road (no. 187 Whitehall Road), Church Road and Blackswarth Road (no. 190 Church Road, former Lloyds Bank) are highlighted. The development at the corner of Lyppiatt Road and Whitehall Road is also highlighted. As is historic development at the corners of Gilbert Road and Whitehall Road as well as Devon Road and Whitehall Road. There is a general pattern of street corners accommodating larger buildings in the area, with the examples beneath illustrating this.



Left - 190 Church Road, Former Lloyds Bank - Right - Corner of Lyppiatt Road / Whitehall Road

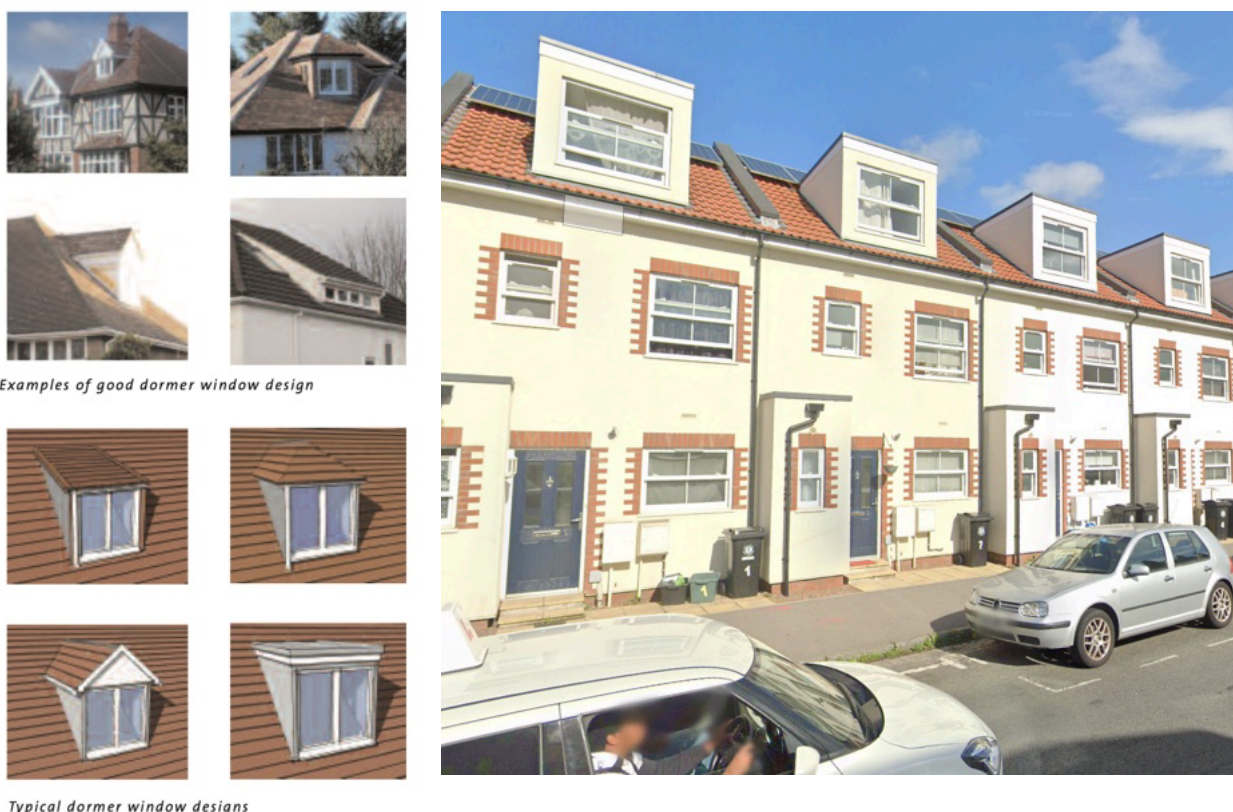
The scheme comprises relatively modest scale extensions in comparison to the examples above. The proposed roof would not exceed the maximum height or depth of the existing roof. The increased pitch would remain inkeeping with established proportions and parameters, as well as retaining the overall pitched style of the roof.

It is contended that this location at a prominent street corner is an appropriate location for an increase in massing. Policy DM29 of the Council's Site Allocations and Development Management Policies Local Plan (2014) refers to an expectation for buildings to: *"Incorporate active frontages and clearly defined main entrances facing the public realm that emphasise corners and reinforce the most prominent frontages."* The development would emphasise the corner and reinforce prominent frontages whilst remaining keeping with the scale of development on Whitehall Road and Victoria Parade. This principle has been applied by the Council when assessing and permitting other developments nearby the site, such as those shown above.



As demonstrated in the 3D model above, the increased pitch remains in keeping due to retaining the existing height and eaves level. The corner location is well suited to accommodating increased massing at roof level, providing greater emphasis on this part of the townscape. The design is comparable to that at 190 Church Road, Former Lloyds Bank permitted by the Council in May 2018 (application ref: 18/03977/F). The proposed materials are traditional and in keeping, ensuring a complementary appearance for the extension.

It is highlighted that the Council's design guidance for extensions (SPD2) includes examples of front and side roof dormer window extensions that will be acceptable in Bristol (left beneath). The proposals have been designed to reflect the scale and design of dormer windows included in SPD2. The size and scale of dormers proposed is notably significantly smaller and more sensitive than the new dwellings at the former White Hart pub site, a short distance east on Whitehall Road. This development was permitted by the Council in May 2018 under application ref: 17/06832/F under the Local Plan and design guidance that remains current.



Above left, Diagram from Page 15 Bristol A Guide for Designing House Alterations and Extensions SPD2. Right, nos. 1-14 Whitehart Court, east of site on Whitehall Road

In accordance with the adopted SPD2 guidance, the Council has granted planning permission for at least 3 new developments including modern front dormers within 500m of 144 Whitehall Road in the past 8 years. These include the former White Hart pub site to the east on Whitehall Road, the former sports court site now known as 'Lacie Court' to the south west on Gilbert Road (image beneath) and the former Lloyds Bank, 190 Church Road (page 18, above).



Lacie Court, Gilbert Road



1B-1C Woodbine Road

There is also an example of front dormer extensions being permitted at an existing building, no. 187 Whitehall Road (application ref: 20/02545/F). There are also examples of historic dormers on houses on Gilbert Road and Albert Parade.

Roof dormers are demonstrably part of the character of the area and are acceptable in accordance with local design guidance. The proposed roof dormers are kept to the minimum scale necessary to facilitate small windows providing outlook from the upper floor flat. The scale is comparable to historic and traditional style dormer windows found in the vicinity. The scale does not dominate the roof faces or add excessive massing at roof level. The wider pitched roof form remains prominent and reads clearly, ensuring the extended building remains in keeping with adjacent sites.

The proposals include rearranged fenestration on the existing rear extension, enlargement of first floor side windows to match proportions and sills of historic windows in the original building adjacent, replacement of doors with conservation style panelled units and application of a new render finish. These proposals better integrate the rear extension with the wider building, providing a more coherent architectural design that will enhance the appearance of Victoria Parade. This is another benefit of the scheme to the appearance and character of the area, in compliance with national and local planning policies which should be given weight in planning assessment.

Overall, the scheme sensitively balances the Applicant's desire to 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, removal of flat roofed rear extension and reintroduction of traditional Victorian design and materials. These aspects

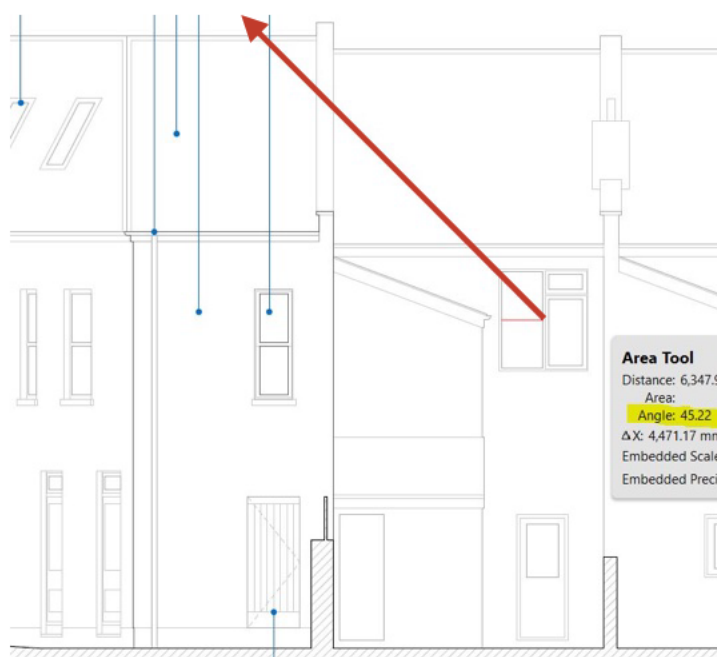
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directly accord with Policy BCS21 of the Core Strategy and Policies DM26, DM27, DM28 and DM30 of the Site Allocations and Development Management Policies Local Plan.

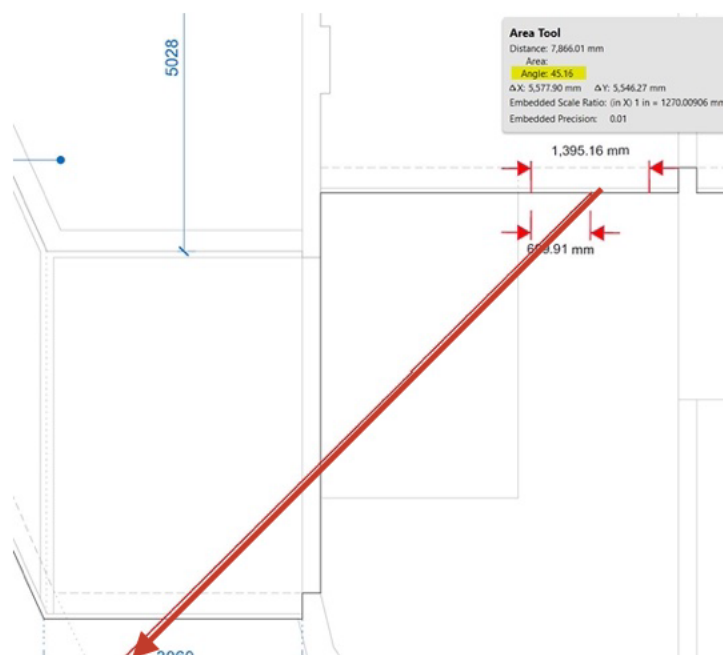
Neighbouring Amenity

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 proposed extensions would be limited to roof level where neighbouring buildings do not include any directly adjacent roof level windows. There would be no increase of the building above the current ridge level height. The proposed roof form would be adjacent to 1 no. inner rear facing first floor window at no. 146 Whitehall Road. 45 degree tests relating to the impact of the proposed development to this window are provided beneath.



The red lines on the proposed elevations and plans above are marked at 45 degrees from the centre point of the neighbouring first floor window. As demonstrated, there is very minor obstruction of the 45 degree line, indicating impact on the window will be limited. The obstruction in plan occurs towards the end of the building where the height is reducing associated with the rear pitched roof. In elevation, the obstruction occurs only associated with the upper part of the proposed roof immediately west of the neighbouring window.



Due to the obstructions being at the lowest pitched extremity of the extension and upper section which is oblique to the window, the impact on light and outlook from the window will be limited. The two storey rear closet wing of the neighbouring building and that of the subsequent neighbour to the east (no. 28) have a greater impact on outlook and light received by this neighbouring window.

No side windows are proposed facing neighbouring homes.



The images above demonstrate the impact of the existing buildings at nos. 144 - 148 on the rear of no. 146. The rear of the property is also enclosed by vegetation in the rear garden,

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as well as existing development to the south (no. 80 Victoria Parade). It is generally a tightly knit, enclosed environment which is not uncommon for inner urban terraced streets.

Taking account of existing conditions and the impact of proposed development, the proposals will safeguard acceptable standards of amenity and living conditions at neighbouring homes in accordance with requirements of local policies BCS21 and DM30. No harmful impacts to daylight, sunlight, outlook and privacy will result for neighbours.

There is likely to be an improvement in conditions for neighbours associated with the commercial use of the betting shop ceasing, associated traffic, deliveries, collections, bins, noise, activity and nuisance being removed. Introduction of dedicated bin stores will improve the amenity of the area, to the benefit of neighbouring residents.

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 as the appropriate space standard for residential developments.

It is noted that adopted policy (BCS18) simply refers to 'appropriate space standards' rather than specifically the Nationally Described Space Standard (NDSS). The Space Standards Practice Note is not part of the Local Plan and has not been subject of formal examination. The Practice Note is a material consideration only, rather than forming part of the development plan.

The development will create a two bedroom, three person flat at ground floor level. The first floor flat will be reconfigured to form a one bedroom, two person flat. The upper second floor flat will be a one bedroom, one person flat. These dwellings are required by the NDSS to provide 61m², 50m² and 37/39m² (shower instead of bathroom) respectively.

The proposed ground floor flat would have internal area of 59.5m². This is 1.5m² below the 61m² NDSS requirement. It is acknowledged there is a minor shortfall for a two bedroom, three person property.

Firstly, it is highlighted that this shortfall is caused by the choice to incorporate separate accesses for all flats as well as stairs for each upper floor flat. This has been an active and conscious choice by the Applicant and their architect working within the constraints of converting an existing building. The choice has been made to create separate accesses to exclude excessive management and maintenance costs associated with a shared communal access. This will make the flats more affordable for residents in perpetuity which is a benefit that must be weighed against the very minor shortfall in ground floor area.

Furthermore, it is not considered that the 1.5m² shortfall causes substandard or harmful living conditions in this instance. Both bedrooms in the ground floor flat meet the minimum NDSS area requirements, 11.5m² for a double bedroom and 7.5m² for a single bedroom. The single bedroom provides 10m², thereby significantly exceeding the minimum size requirement for a single bedroom. The shortfall is therefore associated with the living and circulation areas rather than bedrooms.

The plans demonstrate that the ground floor flat includes 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.

Despite a technical shortfall, this will not be harmful to living conditions or amenity of residents in this instance. The benefit of more affordable accommodation without management fees must also be taken into account. In comparison to other compact, affordable types of accommodation such as co-living or studios, the scheme performs much better and offers occupiers benefits of self-contained apartments.

The first and second floor flats both comply with NDSS requirements, offering GIA of 52m² and 44m² against requirements for 50m² and 37m² respectively. The flats will therefore exceed minimum space standards for the type of accommodation proposed. As shown on plans, the dwellings include an open plan living rooms with a compact kitchen, sitting and dining areas. The bedrooms have sufficient space for a bed in addition to storage and a desk.

With regards to internal height, the NDSS require that minimum floor to ceiling height of 2.3m is achieved for 75% of gross internal floor area. The upper floor flat has been designed to meet this requirement and 35m² of the flat (e.g. around 80% = over 75% of the area of the flat) will provide ceiling height of 2.3m. The ground and first floor flats both exceed 2.3m in height throughout. The development is fully compliant with NDSS requirements for floor to

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ceiling height. The apartments will feel spacious and comfortable as a result of good ceiling heights.

The proposed flats provide a smaller type of housing, however there is need for smaller types of housing given this type of housing is more affordable. This type of housing will meet the needs of many groups often underserved by other developments.

The flats provide an acceptable level of space to provide sufficient and acceptable standards of amenity for all reasonable day to day needs. The flats are all dual aspect, benefitting from good sized windows to the north and 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 proposed flats are largely compliant with space standards, are a reasonable size and provide 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

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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, 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 cycle parking stores for all proposed flats, improving the options for sustainable transport by residents of the existing dwelling. This is shown on plans, with facilities for the ground floor flat located to the front of the site, similar to the neighbouring house (no. 146 Whitehall Road). The upper floor flats have facilities accommodated in the rear yard area, which will be secured through installation of a new gate. Cycle parking has level access from the public highway, will be weather tight and secure. 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 all proposed flats. This will also represent betterment on the existing situation where commercial bins detract from environmental amenity. The new front boundary wall and rear yard gate will provide screening of facilities from the street. Full details and implementation 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 gain³ as the development will impact less than 25 square metres of onsite habitat and there is no priority habitat at the site.

³ <https://www.legislation.gov.uk/uksi/2024/47/regulation/4/made>

CONCLUSION

This scheme seeks to rejuvenate, replan and make more efficient use of an existing betting shop to meet urgent and critical need for housing in Bristol. Loss of the betting shop will benefit the community through restricting access to negative consequences of gambling and crime associated with the commercial use. The scheme will create 2 no. additional good standard flats 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 Church Road Town Centre, 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; reintroducing a front boundary wall, increased public surveillance, improved management of bins, removal of unsightly commercial signage and shutters, redevelopment of out of character flat roofed extension as well as reintroduction of traditional Victorian design and materials. As demonstrated above, the proposed extensions are in keeping with local character and optimise density at the site in a sensitive and creative manner.

The quality of proposed accommodation would be good, providing a reasonable amount of space taking account of constraints of the existing building, functional layout and good levels of light, as well as dedicated cycle parking and bin store facilities. The proposed homes 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.