

11-13 WHITELADIES ROAD, BRISTOL, BS8 1PB.

Planning Statement for
Urban Creation (11-13 WLR) Ltd
August 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 20 purpose-built student units (Use Class Sui Generis) within 11-13 Whiteladies Road.

1.2 The formal description of development is therefore as follows:

Change of use from office to provide 20 no. purpose-built student units and associated works.

1.3 This statement provides a description of the site and its planning history, sets out the proposals and explores the impact of development in the context of Bristol City Council's adopted Development Plan and any relevant material considerations.

1.4 Please note, this application relates solely to the main building at the 11-13 Whiteladies Road site. The rear annexe is not included within this proposal.

Submitted Plans and Documents

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

- Application Form
- CIL Form
- BNG Exemption Form
- Energy & Sustainability Statement
- 2131 HDAS 2025-07-21
- 2131 Waste Statement 2025-07-21
- Suite of existing and proposed plans produced by Shu Architects:
 - 2131 600-Location Plan
 - 2131 601-Existing Site Plan
 - 2131 602-Existing Floor Plans
 - 2131 603-Existing Elevations
 - 2131 604-Proposed Site Plan
 - 2131 605-Proposed Floor Plans
 - 2131 606-Proposed Elevations
 - 2131 607-Sections
 - 2131 608-Lightwell and Railing Details

2 SITE DESCRIPTION

Context

- 2.1 The application concerns 11-13 Whiteladies Road, a 3-storey semi-detached building with a basement, set back from the road, currently in office use with car parking and an annexe at the rear. The period-style building has painted masonry to the front with a render finish to the sides and rear. The existing block currently accommodates two office units, one in the main building (vacant) and the other in the annexe (occupied).
- 2.2 There are two access points leading into the site from Whiteladies Road, which lead to a private car park at the front of the site, along with another private car park at the rear, both of which currently serve the offices within the main building and the annexe, respectively.
- 2.3 Whiteladies Road is a significant route for vehicular travel into Bristol City Centre. There are several public transport options available within close proximity to 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, offers 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, and 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.
- 2.6 The site benefits from its close proximity to significant areas of public green space, being equidistant between Brandon Hill, with views across Bristol, and Royal Fort Gardens within the University Campus. Additionally, the approx. 179ha Durdham Downs, a site of Nature Conservation Interest, is accessible in under 15 minutes via public transport.



Figure 1 - Aerial View of the site (Google Maps)

Conservation Area Description.

- 2.7 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 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.

An excellent site for Purpose-Built Student Accommodation

- 2.8 The site is exceptionally well located for PBSA. It is located within close proximity of the University Precinct; a BCC designation covering the University of Bristol's main campus and the area surrounding it. Within the University Precinct, applications relating to higher education and University expansion are encouraged. Transport Links to other University Campuses are also available within close proximity (including the regular U1 and U2 bus services) of the site, making it ideal for student accommodation in sustainability terms.



Relevant Designations

- 2.9 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

2.10 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
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
25/11594/F	Change of use from office to provide 20 no. short term lets/Guesthouse/hotel (Use class C1) and associated works.	GRANTED subject to condition(s)
25/12838/PINS	Application for Planning permission for Demolition of the rear annexe and delivery of 4 mews houses for short-term let with associated landscaping and other works.	PENDING DETERMINATION

- 2.11 The applications listed above relate to the wider site, which also includes the annexe building. There are, however, three applications within this list which are of particular relevance to this current proposal. These are set out below:

Application Ref: 25/10493/COU

- 2.12 This permitted development consent permits the change of use from the existing office (Use Class E) to 17 dwellings (Use Class C3). This shows 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.

Application Ref: 25/10495/F

- 2.13 This application was also submitted earlier this year and approved in April 2025. The full application proposed a number of external works, which were required to ensure the Prior Approval application discussed above would deliver suitable levels of amenity to future residents.

Application Ref: 25/11594/F

- 2.14 The third relevant consent was approved by Bristol City Council in July 2025. This application permits 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.

- 2.15 To ensure there is no requirement for overlapping consents, all external works which are intended to be built out, subject to this application being granted, have been reapplied for within this application. Given that many of these works have already been approved via previous consents, it is not expected that these elements will be contentious. These proposals are discussed in detail within the Proposed Development and Key Planning Considerations sections of this statement.

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 BCS2 Bristol City Centre
- Policy BCS5 Housing Provision
- Policy BCS7 Centres and retailing
- Policy BCS10 Transport and Access Improvements
- 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 DM7 Town Centre Uses
- Policy DM12 Retaining Valuable Employment Sites
- Policy DM23 Transport Development Management
- Policy DM26 Local Character and Distinctiveness
- Policy DM27 Layout and Form
- Policy DM30 Alterations to Existing Buildings
- Policy DM31 Heritage Assets
- Policy DM32 Recycling and Refuse Provision in New Development

- Policy DM35 Noise Mitigation

Bristol Central Area Plan (March 2015)

- BCAP1 Mixed-use development in Bristol City Centre
- BCAP4 Specialised student housing in Bristol City Centre
- BCAP5 Development and Flood Risk
- Policy BCAP7 Loss of Employment Space
- BCAP25 Green infrastructure in city centre developments
- BCAP29 Car and cycle parking in Bristol City Centre
- BCAP42 The Approach to the West End

Supplementary Planning Documents / Guidance

- 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)

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 councils 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 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

- 3.5 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 the 25th April 2024. The examination hearings concluded in April 2025, lasting 7 weeks. Accordingly, therefore adoption is unlikely until next year.

- 3.6 A wide range of objections were made by residential and PBSA developers, along with the University of Bristol and the University of the West of England; these were then discussed during the examination process. Key concerns included:
- The Council's calculation of student housing need is considered to be under-evidenced and inaccurate.
 - Policy H7 imposes unnecessary and unjustified restrictions on the delivery of PBSA in the city, and;
 - In terms of overall housing, the Council's decision to set aside the standard method housing calculation and the cities and urban centres uplift without suitable justification is contrary to national policy.
- 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 Rapleys is aware that the Regulation 19 consultation and examination attracted a significant level of objection, particularly with respect to the draft policies – notably H7 – and the evidence base concerning PBSA. Given the number of objections at this juncture, it is considered that the LPR policies, and H7 in particular, can only be attributed limited weight in the decision-making process. At the time of writing there has been no indication from the inspectors as to the suitability of the plan.
- 3.9 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)

- 3.10 In accordance with the Community Infrastructure Levy Regulations 2010, Bristol City Council has produced and adopted a CIL Charging Schedule which was introduced 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. £174.55 per sq.m (including 2025 indexation) is required for new student residential development in Bristol.
- 3.11 Where the conversion / change of use of an existing building is concerned, CIL will not be charged if the requirements of the vacancy test are met. To pass the test, a building needs to have been in lawful use for a continuous 6 months out of the 36 months immediately preceding the date on which the planning permission is issued. Please refer to the accompanying CIL Form for further detail.

Case Law

- 3.12 Given that the application site lies within a Conservation Area, the following case law should be taken into consideration – South Lakeland DC V SSE, 1992. The outcome of this case rested upon the interpretation of key words in the legislation, namely 'preserve' and 'enhance'. It was held that

provided the development does not cause harm to the character and appearance of a Conservation Area, then there is a presumption in favour of consent (subject to other planning considerations).

4 THE PROPOSED DEVELOPMENT

Land Use

- 4.1 The development comprises the conversion of the main building at the site from its existing office use (Use Class E) to purpose-built student accommodation (Use Class Sui Generis). The proposed change of use relates to all four floors of the existing building.

Design

- 4.2 The layout of the accommodation is shown in the proposed floor plans submitted with this application, 20 bedrooms are spread across all floors of the building. The provision of rooms on each floor is set out below:

Floor	Proposal	Total Rooms
Basement	4 studios + 2 one-bedroom flats	6
Ground Floor	4 studios + 2 one-bedroom flats.	6
First Floor	3 one-bedroom flats + 1 two-bedroom flat.	4
Second Floor	3 one-bedroom flats + 1 two-bedroom flat.	4

- 4.3 Internally, the flats will come equipped with all amenities expected within high quality student accommodation. These include a private kitchen, bathroom, bed and laundry facilities. On the ground floor at the entrance of the building, there will be a reception desk and directly below this will be a welfare space for staff.
- 4.4 As noted in the planning history, this application has been submitted following the grant of a Class MA Prior Approval application, an external enabling works application and a full planning permission for the change of use of the site from office to C1 short term lets. For completeness, elements of the three consents have also been included within this application. As these elements of the proposal have already been reviewed and deemed acceptable by the LPA there should be no issues relating to their acceptability within this application. These proposed elements are as follows:
- Secure cycle storage
 - Dedicated refuse store
 - The addition of two lightwells, one to the front and one to the side
 - Hedge planting along the border between the site and Whiteladies Road.
 - Replacement of the doors and stairs at the rear of the site with new Juliette balconies.

- PV panels and a roof light / Automatically Opening Vent will be installed on the roof.
- ASHPs mounted to the rear wall.
- New parking arrangements.

4.5 Both the changes approved within consents ref: 25/10493/COU, 25/10495/F 25/11594/F and the newly proposed elements have been included and discussed within this application to ensure completeness.

Scale, Massing and Materials

4.6 Whilst this application does not propose an increase in the floor space within the site, it does propose that the sides and rear of the building be fitted out with external insulation. This layer of insulation will then be covered by an external render across all three sides, which will be the same colour as the existing situation. This is required to meet Building Regulation Part L for thermal improvements and energy efficiency; however, by delivering it via this route, the appearance of the building remains unchanged. An in-depth assessment of the U-values required is detailed on Page 6 of the Heritage Design and Access Statement.

4.7 The insulation improvements suggested above also offer an opportunity for the windows at the site to be upgraded and the external pipework to be rationalised. It is proposed that the two doors to the rear elevation at the basement level are changed to windows. It is also proposed there are two new windows to the new basement lightwell on the south (side) façade. These would be painted sash windows to match the style of the existing building. Finally, it is proposed the casement window on the second floor at the rear is altered to be a traditional style sash window to match the adjacent windows to the rear elevation.

4.8 The applicant also proposes to, during the course of the works, clean the painted stone on the front façade of the building will be cleaned to bring the building's Bath Stone detail back to its original appearance. This will improve its appearance, improve the visitor experience and allow the surface to regain its breathability. A test patch demonstrating the end result of the process can also be found on page 6 of the Heritage Design and Access Statement produced by Shu Architects.

Accommodation & Amenity Space

4.9 It is proposed that alterations be made to the arched window on the south side elevation. This will allow for the removal of the existing staircase on the south side of the property, and the installation of a new floor inside to provide additional floorspace for units, and the addition of new windows. The overall shape of the window and the lines of the glazing bars will remain unchanged to minimise visual impact. To ensure the new floor is not visible from the outside of the property, obscured glass will be installed on the second row of window panes as set out on the Proposed elevations and the Heritage Design and Access Statement.

4.10 Additionally, the basement windows on the front and sides of the building are currently served by relatively small lightwells. The Heritage, Design and Access Statement's historical review of the site sets out that it is likely these lightwells were originally much larger. Understanding this, and in

line with the same change which was granted consent through application ref: 25/10495/F, two larger lightwells are proposed for installation: one on the front elevation and one on the south side. These lightwells will be equipped with railings appropriate to the surrounding heritage context, the full details of these proposals can be seen on the 'Proposed Elevations' and 'Proposed Floorplans'. This improvement will substantially enhance the natural light levels in the basement rooms, improving future residents' amenity.

Highways

Access

- 4.11 Access to the site for vehicles and pedestrians will remain the same as the existing situation. Vehicles will enter and exit the site via Whiteladies Road with a one-way entrance and exit system.
- 4.12 The parking provision is 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.
- 4.13 Full details and an annotated plan detailing the access provision are provided on Page 8 of the Heritage Design and Access Statement.

Servicing Arrangements

- 4.14 Refuse from each room will be stored in a secure communal bin store located at the rear of the site, out of sight of the public realm. The plan for the bin store arrangement is contained on the Proposed Site Plan. The waste store will be enclosed by a 1.8m slatted timber fence.
- 4.15 The refuse and recycling bins will be relocated to the holding area next to the pavement on scheduled collection days by a staff member from Urban Creation. This area is where the existing waste from the offices is picked up. The landlord will coordinate with the Refuse Management Team 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 proposes the installation of a number of renewable energy technologies. PV panels are proposed across the roof of the main building. This amounts to 60 no. 440W PV panels positioned on the east and west roof slopes. Additionally, ASHPs are also proposed, these are located along the northern wall at the rear of the site. As this area is close to the proposed parking spaces for the office unit being retained at the rear of the site, bollards have been proposed in front of the ASHPs to protect them from cars moving in and out.

Daylight & Sunlight

- 4.17 All rooms are serviced by ample natural light through the large period style windows. Additionally, a roof light to the valley gutter will form an Automatically Opening Vent to the head of the communal stairs, as shown on the proposed site plan. This will allow natural light into the stairwell providing a well-lit space within the communal area of the building.

5 KEY PLANNING CONSIDERATIONS

Principle of Development

New (Sui Generis) Purpose Built Student Accommodation

Site Suitability

- 5.1 An evidenced undersupply of PBSA in Bristol has driven the necessity for this proposal.
- 5.2 The site's proximity to the University of Bristol's Clifton Campus, coupled with its excellent transport links and location within an area where students will be able to access all essential services (both in educational and in living terms) and open spaces without the need for private transport, makes the site well suited to accommodating new purpose-built student accommodation.
- 5.3 Given the city centre nature of the immediate area, which includes a variety of residential and commercial uses and busy, lively streets, it is not considered that the development will result in a harmful concentration of a singular use such as PBSA. Further commentary is provided on this point below.
- 5.4 Furthermore, the development will contribute towards improving the mix of residential uses in the city, reducing pressure on residential homes in more traditional residential areas by providing focused and managed student bed spaces in an appropriate location, in accordance with local and national planning policy aspirations. Pressure on these homes will only increase if PBSA is not approved and delivered – made more acute by the current shortfall in general housing delivery.
- 5.5 For the reasons explained above, the delivery of PBSA in this location is considered to represent, in principle, a sustainable use of this site.

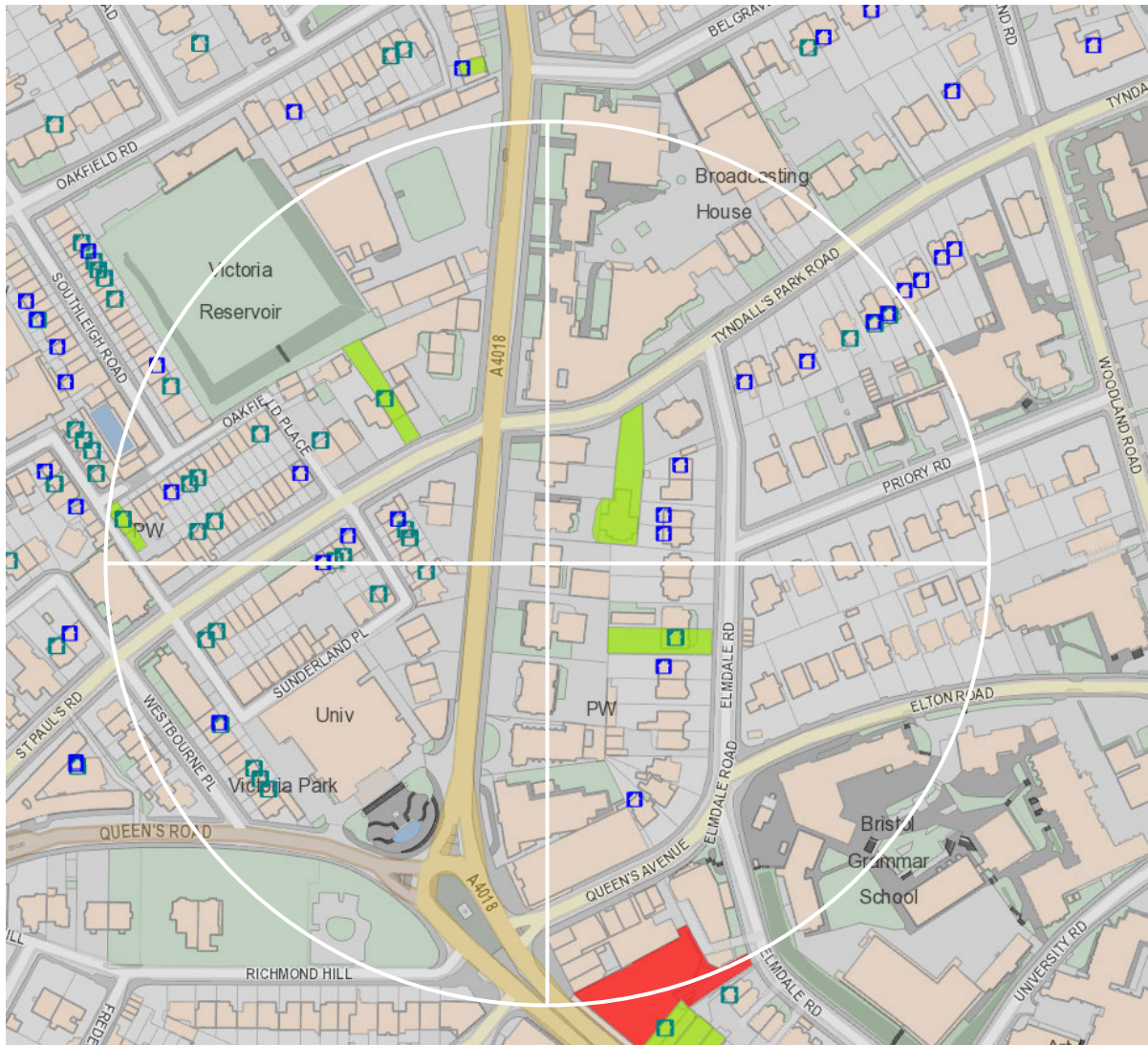
Policy Assessment

- 5.6 Policy DM2 and BCAP4 are used to assess applications for student accommodation in Bristol. Policy DM2 explicitly states that specialist student housing schemes will be acceptable within the city centre. The relevant test for such development is therefore set out within city centre policy BCAP4, which states:

Specialist student housing schemes that contribute to the diversity of uses within the local area will be acceptable within Bristol City Centre unless it would create or contribute to a harmful concentration of specialist student housing within any given area.

- 5.7 In addition to BCAP4, emerging policy H7 seeks to ensure that there would not be a 'local imbalance' of purpose-built student accommodation. Although this policy is not yet adopted and carries very limited weight, it does refer to testing, as a 'guideline', such an imbalance using a 200m radius from the site within a city centre location.
- 5.8 As such, using the Council's 'Pinpoint' system, the location of 'specialist student housing' (as specified by policy BCAP4) has been mapped within 200m of the site. This investigation shows that there are 183 specialist student housing bedspaces within the area and a total of 257 HMO

bedspaces (see figure below). When combined, this totals to 440 bedspaces within 200m. This falls comfortably below Policy H7's guideline as to what could cause a local imbalance in this area (1,000 bed spaces).



5.9 The above analysis is therefore considered to complement the conclusion that there would not be a 'harmful concentration' of PBSA in the area, in accordance with BCAP4. It must also be stressed that there are other weighty material factors involved in determining site suitability and, therefore, reliance on capacity testing a guideline 200m radius should not deliver an overall conclusion. The fact that the site is located so close to the University is considered more important to sustainable spatial planning in this respect.

5.10 For additional assurance, and notwithstanding that the policy states that student accommodation is acceptable within City Centre locations, Policy DM2 sets out criteria against which specialist housing can be assessed against. This is assessed against the development below:

1. The development would harm the residential amenity or character of the locality as a result of levels of activity that cause excessive noise and disturbance to residents

- The “character of the locality” is one of activity and vibrancy, consisting of a busy thoroughfare. This is not a quiet suburban area, more vulnerable to disturbance. Nearly all neighbouring uses are commercial; however, the wider area includes offices, retail, educational, residential, and religious buildings. Indeed, for this reason, the site is considered better suited for PBSA development than, for example, family housing. Taking the above into account, the proposed development is not considered to present an unacceptable risk in terms of noise or disturbance to existing residents.
- Additionally, should this application be consented, the applicant is content to accept a condition requiring the production and adoption of a Student Management Plan to ensure the ‘character and locality’ can remain unharmed.

2. Levels of on-street parking that cannot be reasonably accommodated or regulated through parking control measures

- Directly south of the site is the ‘Controlled Parking Zone’ which is subject to strict parking controls. Existing parking spaces on Whiteladies Road are controlled by pay and display (short stay) restrictions. The other option for parking is the West End Car Park approximately 200 metres away.
- As stated previously, the proposed development will provide 6 x private parking spaces (1 disabled) within the front courtyard. Notwithstanding, it is considered that ‘car-free’ development would be acceptable in this location.
- As with assessment criteria 1, a condition could be imposed to prevent future residents from obtaining parking permits for spaces outside the site. This can also be included within a Student Management Plan required to be produced and adopted once the application has been approved.

3. Cumulative detrimental impact of physical alterations to buildings and structures

- As explained above, the proposed physical alterations have been carefully considered to respond to the site constraints, historic environment and prevailing design character. Further information can be found in Key Consideration 3 – Design and Heritage.

4. Inadequate storage for recycling/refuse and cycles

- Policy compliant refuse/recycling and cycle storage are provided. See the Transport section of this report below for further details.

5. The development would create or contribute to a harmful concentration of such uses within a locality as a result of any of the following:

- As discussed above in relation to policy BCAP4, the proposed development will not result in a harmful concentration of student uses. Policy DM2 explicitly states that specialist student housing schemes will be acceptable within the city centre. The site is considered well suited to PBSA given its location so close to the University Precinct.

5A. Exacerbating existing harmful conditions including those listed above; or

- As set out above, the proposed development has been designed to prevent/mitigate noise, disturbance, litter and on-street parking issues.
- The proposal improves the condition of the building internally and externally and reduces pressure on housing in Bristol by delivering a student-focused development.

5B. Reducing the choice of homes in the area by changing the housing mix.

- The proposal will not impact the existing residential units in the area. Instead, it will broaden the choice of housing by introducing new student units to help address considerable unmet demand in the Bristol PBSA market.

Student Housing Need

Background

- 5.11 There is wide-ranging evidence that demonstrates a severe undersupply of student accommodation in Bristol. Key facts and figures produced by Cushman and Wakefield's (C&W) in 2024 are provided below:
- Lowest net increase. Of all major cities in the UK, Bristol has experienced the lowest net increase in PBSA beds (6,384) between the years 2012 – 2022.
 - High rental costs for students. The weighted average annual rent in Bristol for 2024/25 (£10,765.57) is the highest in the UK, 29.03% above the national average (£8,343.39). The average private sector direct-let bed price (£17,991.08) is also the highest outside London, 88.20% above the national average (£9,559.32).
 - Largest numbers of students unable to access PBSA. Bristol has the highest percentage of students needing a bed but unable to access PBSA (65.62%) among major UK markets.
 - High student-to-bed ratio relative to other markets. Bristol's student-to-bed ratio of 2.85:1 (2022/23) is the highest outside London, significantly above the national average (2.12:1) and comparable major UK markets (2.07:1).
 - More students occupying general housing stock. From 2013/14 to 2022/23, the number of students needing a bed but unable to access PBSA increased by 12,819 (65.07%), leading to 3,205 more houses occupied by students. This is the highest rate of students living in HMOs among major UK markets.
- 1.1 Additionally, an assessment of the uses in the area, based on Bristol City Council's Pinpoint service, highlights the vast presence of bars, nightclubs, restaurants, museums, and theatres, all of which are conducive to the average student's lifestyle. The map below illustrates individual establishments (note that general shops, while prevalent, are not included).
- 1.2 Given this context, introducing 'sui generis' student beds would enhance the area's vitality and economy through increased interaction with these tourism uses.



Figure 2 - Pinpoint Map mixture of uses within the local area

Local Plan Review

- 1.3 The Local Plan Review currently only seeks to deliver a minimum housing target of 1,925 new homes per annum, which equates to approximately 51% of the housing need in the city. Significant concerns have also been raised at the Local Plan Examination about the Council's calculation of student housing need, which is a subset of overall housing need.
- 1.4 The Council's evidence fails to recognise the current and historic long-term undersupply of purpose-built student accommodation (PBSA) in the city. The identified need figure of 8,800 student bedspaces is unsound. It is based solely on the UoB's prediction that an additional 8,834 beds will be required to serve their students by 2040 (rounded to 8,800). Importantly, it fails to account for:
 - The historic and existing unmet need for PBSA in the city.
 - The demand for PBSA beds arising from the predicted growth in student numbers at University of the West of England (UWE) and other Higher Education providers over the plan period.

Summary

- 5.12 The proposal shows clear compliance with policies DM2 and BCAP4, which aim to ensure proposals of this type have no adverse effect on the surrounding population through increases in student density or activity. Analysis of PBSA provision nearby confirms that there would be no overconcentration. In addition, Policy DM2 explicitly states that specialist student housing schemes will be acceptable within the city centre.
- 5.13 Given the location of the site adjacent to the designated University Precinct and the city centre nature of the immediate area, which includes a variety of residential and commercial uses and

busy, lively streets, it is not considered that the development will result in a harmful concentration of a singular use such as PBSA.

Loss of Office Use

5.14 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.

5.15 Policy BCAP7 Loss of Employment Space focuses on revitalising 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.'

5.16 It should also be noted that the Emerging Local Plan Review contains no policies aimed at protecting employment space outside of designated Industry and Warehousing Areas. This recognises the changing market and the need for greater flexibility in commercial use.

5.17 As set out earlier in the report, the building was last occupied in office use, although it has been vacant for a prolonged period.

5.18 Irrespective of the above, the applicant has provided a marketing report produced by Burston Cook, confirming no strong interest or formal offers. The office's compartmentalised layout seems less appealing to tenants who prefer open-plan designs to optimise space utilisation and workplace flexibility.

5.19 Additionally, the property lacks a lift and has stairs leading to the front door, posing challenges for commercial users, especially those needing accessibility. Without lift access, it is difficult to accommodate individuals with mobility impairments or disabilities, making the space less desirable to businesses prioritising inclusivity and accessibility standards, and therefore restricting the tenant pool.

5.20 In light of the current vacancy of the office accommodation, the conclusions drawn by the marketing specialists Burston Cook, and the lack of suitable offers, the loss of this office accommodation is supported by policy BCAP7.

5.21 It should also be noted that, whilst this proposal does relate to the change of use from an office use (Use Class E) to a residential-based use (Sui Generis), 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.

- 5.22 This report 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 students, often living away from home for the first time, who will both require access to all the necessary amenities provided by the local area, and more importantly, will benefit greatly from living close to the university.
- 5.23 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.
- 5.24 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 like 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.
- 5.25 The changes listed above all came into effect well after the publications of BCC's Site Allocations and Development Management Policies (2014) and Bristol Central Areas Plan (2015) and when considering this, adopted policies such as DM12 and BCAP7 should be afforded limited weight given they do not reflect the current national legislation or the government's new emphasis on flexibility.

The fallback position.

- 5.26 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), and full planning permission for the change of use of the main building from office to short term lets (Use Class C1) via application ref: 25/11594/F.
- 5.27 These permissions are 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.
- 5.28 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.

5.29 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)"

5.30 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".

5.31 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:

- An intensification of use which would, in turn, increase the benefit on the other uses within the city centre.
- 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.

5.32 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

5.33 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.

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

- 5.34 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).
- 5.35 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.
- 5.36 Noting that the site is not listed, but does fall within the Whiteladies Road Conservation Area, it is considered that 11-13 Whiteladies Road is a building of some value within the setting of the Conservation Area. In line with this, an assessment of the visually significant changes was undertaken in the Heritage Impact Assessment found on Pages 6 and 7 of the Heritage Design and Access Statement.
- 5.37 The changes of note include the following:
- Highways changes
 - External Wall insulation
 - Lightwells, windows and Juliet balcony changes
 - Renewable technology delivery, and
 - Front façade improvements.
- 5.38 The proposal to reduce parking in the front courtyard and to introduce dedicated refuse and recycling storage at the rear will help enhance the tidiness of the front courtyard. It is believed that these improvements will preserve the setting of the Conservation area and preserve the setting of nearby listed buildings.
- 5.39 The proposals to install new external wall insulation, along with a stone cladding detail and new heritage-style pipework, have been thoroughly considered. It is believed this will have a neutral impact on the Conservation Area and the nearby listed buildings. Additionally, it will positively contribute to the long-term sustainability and viability of this heritage property.
- 5.40 The proposed installation of new light wells, windows, and Juliet balconies will use high-quality materials and will not be prominent in their positioning in relation to the wider Conservation Area. It is believed that these changes will have a neutral impact on the heritage assets of the conservation area and the nearby listed buildings.
- 5.41 The proposed installation of renewable technologies will not be visible from the broader Conservation Area. Therefore, it is believed that they will have a neutral impact on the heritage assets within the Conservation Area and the nearby listed buildings. Additionally, it will positively contribute to the long-term sustainability and viability of this heritage property.

5.42 The above changes are identical to the exterior changes proposed in application ref: 25/11594/F which was approved earlier this year. Given that the application was reviewed by Bristol City Council so recently, there is no reason to assume that the findings would be any different in this case. Therefore, it is considered that the proposed external changes will positively maintain both the Conservation Area's quality and the setting of nearby listed buildings. Thereby complying with policies DM22 and BCS31 of the development plan.

Residential Amenity

5.43 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.

5.44 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:

5.45 In terms of amenity for future residents:

- All proposed rooms are equipped with all the amenities expected within a PBSA unit, these include a kitchen, bathroom, bedroom and laundry facilities.
- Reception facilities at the entrance will provide students with a clear route to assistance should it be required.
- All rooms will receive plenty of natural light. The building's orientation ensures that each room will enjoy sunlight for most of the day. Additionally, the wide separation from neighbouring buildings reduces shadows and minimises the risk of overlooking.
- A proposed roof light allows open air and light into the communal stairwell
- Generous flat sizes when compared with other student schemes nearby.

5.46 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.

Biodiversity and Green Infrastructure

5.47 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.'

5.48 The only green infrastructure existing on the site is a small hedge to the rear of the site. To improve this situation, a new hedge has been proposed along the wall connecting the site with Whiteladies Road, this will generate an improvement in terms of biodiversity and green infrastructure.

- 5.48.1 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

- 5.49 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.

- 5.50 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. Of note:

- The site has two access routes, both via Whiteladies Road.
- 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.
- The 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 exceeds the minimum cycle parking standards detailed within Appendix 2 of BCC's Site Allocations and Development Management Plan.
- The proposed units will also be serviced by 6 existing parking spaces (with 1 disabled space), which have been brought into compliance with space standards. They can be used for servicing functions as well as assist with the move-in/move-out process.
- The annexe will also retain its 6 car parking spaces adjacent to their office at the rear of the site.
- A secure refuse store has been located at the rear of the site.

Energy and Sustainability

- 5.51 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%.
- 5.52 An Energy and Sustainability Statement has been produced by JMDC Services Ltd, which will address Policies BCS13-BCS16. The calculations of this report are in accordance with the Policy Guidance and the Bristol Climate Change and Sustainability Practice Note.

- 5.53 The policy requirements have been taken into account throughout the early design stages of this development. In accordance with the Heat Hierarchy, Air Source Heat Pumps (ASHP) will provide the heating and hot water. PV panels are also proposed to supplement the ASHP and reduce electricity demand. Additionally, the proposed render around the sides and rear of the building will increase the thermal efficiency. It is considered that, given the scale of the proposed development, the delivery of two forms of renewable technologies at the site is sufficient to accord with the requirements of Policies BCS13, BCS14 and BCS15.

Drainage

- 5.54 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 does not seek any further built development outside of the existing building lines. Noting this, it is not considered that a Sustainable Drainage Strategy is required for this application to be approved.

Community Infrastructure Levy (CIL)

- 5.55 Bristol City Councils Community Infrastructure Levy Guidance Note 1 details which developments are liable for CIL. The document states that the conversion of a building that is in-use will not be liable for CIL.
- 5.56 The application site has been in use as an office (Use Class E) for a continuous period of more than 6 months in the last three years. Therefore, the application is not considered to be liable for CIL. Further details are contained within the CIL Form submitted with this application.

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 change of use of a vacant office to 20 purpose-built student units and supporting external changes to support the new use.
- 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). As well as a full planning permission for the change of use of the main building from offices (Use Class E) to 20. Short term let units (Use Class C1) (Application Ref: 25/11594/F).
- 6.3 This statement demonstrates that the provision of student accommodation at the site will not result in a harmful concentration within the local area, and when considering the sustainable location of the site in relation to the university campus, the change of use from office to PBSA (Sui Generis) is considered acceptable.
- 6.4 The development has been assessed against policies DM2 and BCAP4, with acknowledgement given to emerging policy where relevant. It is concluded that the scheme will not create or contribute towards a harmful concentration of student housing in the area, but rather, it will contribute towards meeting housing need and make effective use of vacant, poorly performing (in energy and accessibility terms), and unproductive floorspace.
- 6.5 The proposed design responds well to the site context and character of nearby development, in terms of layout, scale, massing and materials. Taking the above considerations into account, it is concluded that the proposed external changes, which are minor in nature and effect, will preserve the Conservation Area and the nearby listed buildings.
- 6.6 The design includes suitable cycle parking and refuse storage to meet the relevant policy standards. Both are located within secure and easy (and level) access to Whiteladies Road. As such, taking into account the highly sustainable nature of the site, the proposed development is considered to be acceptable in highway terms.
- 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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