

Bristol City Council – LPA S62A Statement

66 Church Road, Redfield, Bristol, BS5 9JY

PINS Reference: S62A/2025/0112

LPA Reference: 25/13171/PINS



Applicant: Harry Cockram

Description of proposed development: Demolition of existing buildings, on site, and the erection of a three storey building comprising 6no flats and 3no terraced dwellinghouses.

1. Site Description and Introduction

The application site relates to 66 Church Road. Whilst the most recent approval relating to the proposed redevelopment of the site included 68-70 Church Road also, previous planning applications proposed developing these sites separately.

66 Church Road is currently vacant, comprising of a terraced two storey building and semi covered storage yards, accessed from Dove Street. It is understood the site has been vacant since 2000 and was previously occupied as a retail (car spares) business with residential accommodation above. The rear gardens of 1-4 Cowper Street lie to the immediate south east boundary.

The Octavius Hunt factory occupies a large site to the south of the application site, including buildings in use as workshops, storage and offices with open yard and parking areas. The main access into the Octavius Hunt site is on Dove Lane, abutting the southern boundary of the site. The factory is unrestricted in planning terms and is understood to specialise in manufacture of pesticide and disinfectant smokes.

Parking restrictions are in place on both sides of Dove Lane, with a loading bay on the western side of Dove Lane utilised by third parties, understood to include the Octavius Hunt company, due to the restricted narrow access to that site.

The site is not allocated within the Local Plan for any particular land use and is not located within a Conservation Area or in close proximity to any listed buildings. The surrounding area contains a mix = of land uses and buildings, including commercial, residential and industrial uses. The site is close to the busy A420, with good public transport links and within walking distance of Lawrence Hill station and many bus stops.

2. Relevant Planning History

21/04754/F – (66 - 70 Church Road) Demolition of existing buildings and erection of a mixed use development comprising 8 residential apartments and houses, 2 ground floor commercial units (Class E), and 1 office unit (Class E). – Granted Subject to Conditions 31.10.22

19/02665/F (66 Church Road) Demolition of existing buildings on site and erection of a three storey building fronting Church Road, to contain 4No. apartments (Use Class C3) and a ground floor retail/business unit. 3No. three storey townhouses (Use Class C3) fronting Dove Lane. – Refused for the following reasons:

1. The proposed development, by virtue of the height, scale, massing and proximity of the houses proposed fronting Dove Lane would result in a bleak, over dominant and overbearing increased sense of enclosure for residents of 1-4 Cowper Street. The development would allow for unacceptable overlooking into the rear elevations and rear gardens of 1-4 Cowper Street from roof level windows and restrict daylight and sunlight experienced by residents of 1- 4 Cowper Street. The development would also overbear 68 Church Road and impair outlook from windows within that property facing the development. As such, the development would fail to safeguard the amenity of existing residential development, contrary to local plan policies BCS21 of the Core Strategy 2011, DM27 and DM29 of the Site Allocations and Development Management Policies 2014 and the NPPF.

2. The proposed development, by virtue of restricted outlook, sense of enclosure, restricted daylight levels, proximity to the adjacent industrial premises and overbearing height of the rear garden boundaries of the houses would provide an overdeveloped, oppressive and poor quality living environment for future residents. As such the development fails to demonstrate that it would provide a high quality environment for future residents, contrary to local plan policies BCS20, BCS21, BCS23 of the Core Strategy 2011, DM14, DM27, DM29, DM33, DM34 and DM35 of the Site Allocations and Development Management Policies 2014 and the NPPF

3. The proposed development, by virtue of its height, scale, massing, form, plot coverage and overall design would fail to respond to its local context and street scene and would appear as an incongruous form of overdevelopment that would not contribute positively to the area's character and identity. The layout and form of the development would prejudice the existing and future development potential of the adjoining site at 68-70 Church Road and the potential for the area to achieve a coherent, interconnected and integrated built form. As such the development is considered contrary to local plan policies BCS20 and BCS21 of the Core Strategy 2011 and DM26, DM27 and DM29 of Site Allocations and Development Management Policies 2014 and the NPPF.

Copy of report to Committee and Decision Notice attached for reference.

17/04072/F (66 Church Road) - Demolition of existing buildings on site and erection of a three storey building fronting Church Road, to provide a ground floor retail/business unit, with three apartments above, plus 3 x three storey townhouses fronting Dove Lane. Refused for the following reasons:

1. The proposed development would fail to provide a safe and sufficient pavement width on Dove Lane. This would endanger pedestrians using the pavement in the vicinity of the site, in a location with vehicular movements associated with the Octavius Hunt factory site. As such, the development is considered unacceptable on highway safety grounds, contrary to local plan policies BCS10 and BCS21 of the Core Strategy 2011, DM23 of the Site Allocations and Development Management Policies 2014 and the NPPF.

2. The proposed development, by virtue of the height, scale, massing and proximity of the houses proposed fronting Dove Lane would result in a bleak, over dominant and overbearing increased sense of enclosure for residents of 1-4 Cowper Street. The development would allow for unacceptable overlooking into the rear elevations and rear gardens of 1-4 Cowper Street from roof level windows and restrict daylight and sunlight experienced by residents of 1- 4 Cowper Street. The development would also overbear 68 Church Road and impair outlook from windows within that property facing the development. As such, the development would fail to safeguard the amenity of existing residential development, contrary to local plan policies BCS21 of the Core Strategy 2011, DM27 and DM29 of the Site Allocations and Development Management Policies 2014 and the NPPF.

3. The proposed development, by virtue of restricted outlook, sense of enclosure, restricted daylight levels, proximity to the adjacent industrial premises and overbearing height of the rear garden boundaries of the houses would provide an overdeveloped, oppressive and poor quality living environment for future residents. In addition, insufficient information has been provided to demonstrate that any existing sources of noise or odour from sources in the site vicinity (Octavius Hunt premises) can be suitably mitigated and would not adversely affect the health, wellbeing and residential amenity of future residents. As such the development fails to demonstrate that it would provide a high quality environment for future residents, contrary to local plan policies BCS20, BCS21, BCS23 of the Core Strategy 2011, DM14, DM27, DM29, DM33, DM34 and DM35 of the Site Allocations and Development Management Policies 2014 and the NPPF

4. The proposed development, by virtue of its height, scale, massing, form, plot coverage and overall design would fail to respond to its local context and street scene and would appear as an incongruous form of overdevelopment that would not contribute positively to the area's character and identity. The layout and form of the development would prejudice the existing and future development potential of the adjoining site at 68-70 Church Road and the potential for the area to achieve a coherent, interconnected and integrated built form. As such the development is considered contrary to local plan policies BCS20 and BCS21 of the Core

Strategy 2011 and DM26, DM27 and DM29 of Site Allocations and Development Management Policies 2014 and the NPPF.

5. Insufficient information has been provided to demonstrate that the development would not impinge upon or threaten the continued operation and viability of the adjacent established industrial site (Octavius Hunt premises). As such the development is considered contrary to local plan policies BCS23 of the Core Strategy 2011 and DM33, DM34 and DM35 of the of the Site Allocations and Development Management Policies 2014 and the NPPF.

4. Response to Consultation

15 neighbouring properties were consulted on 05.08.2025 with a deadline to reply by 04.09.2025.

OTHER COMMENTS

Please see attached.

5. Main Planning Considerations

Principle of Development including Mix and Balance

National Planning Policy Framework outlines that housing applications should be considered in the context of the presumption in favour of sustainable development. The Local Planning Authority (LPA) should deliver a wide choice of high-quality homes, widen opportunities for home ownership and create sustainable, inclusive, and mixed communities.

Policy BCS5 (Housing Provision) of the Bristol Development Framework Core Strategy outlines that delivery of housing to meet the Council's housing targets will primarily be focused on previously developed sites however some open space will be utilised for housing development.

Policy BCS18 of the adopted Core Strategy states that development should contribute to a mix of housing types and avoid excessive concentrations of one particular type'. The policy wording states that development 'should aim to' contribute to the diversity of housing in the local area and help to redress any housing imbalance that exists.

Bristol comprises a diverse range of residential neighbourhoods with significant variations in housing type, tenure, size, character and quality. A wide range of factors influence the housing needs and demands of neighbourhoods. Such factors include demographic trends, housing supply, economic conditions and market operation. The inter-relationship between these and other factors is often complex and dynamic. In the circumstances, housing requirements will differ greatly across the city and will be subject to change over time. With this in mind an overly prescriptive approach to housing mix would not be appropriate. However, it has been possible to identify broad housing issues that are applicable to many neighbourhoods.

Analysis of the city's general housing needs and demands has identified a number of indicative requirements for each of 6 city zones. The zones reflect sub-market areas used in the Strategic Housing Market Assessment (SHMA). The intention is to provide a strategic steer for all sizes of residential scheme within each zone. A local area-based assessment is required to assess the development's contribution to housing mix as a smaller scale will not provide a proper understanding of the mix of that area; a larger scale may conceal localised housing imbalances. As a guide the neighbourhood is defined as an area equivalent to the size of a Census Lower Level Super Output Area (average of 1,500 residents).

The application site is located within the Netham LSOA within the Easton Ward. An up-to-date picture of the proportion of different residential accommodation types in the LSOA can be obtained by assessing the 2011 Census data suggests that the Netham LSOA comprises approximately 72.6% houses with 51% being 2 bedroom and 28.9% 3 bedroom. On this basis no objections are raised to the mix of housing proposed as the scheme would not create or contribute to local imbalance of housing type or size.

Loss of existing uses

The existing building was understood to be last in use as commercial units at ground floor with residential above. No objections have been raised previously regarding the loss of the existing uses.

Principle of residential use.

The development would be located within an existing mixed use area that includes flats, high and low rise apartment blocks, Victorian terraced housing, and retail, commercial and industrial uses in some proximity to each other. The last application for redeveloped proposed the redevelopment of the site for mixed use commercial/residential purposes which was found to be acceptable and in accordance with local plan policy BCS3, which confirms that social, economic and physical regeneration will be promoted in the Inner East area with the purpose of creating mixed, balanced and sustainable communities.

Whilst it is noted that the current scheme no longer proposes a commercial use at ground floor level, it is not considered that an objection could be sustained and housing would be delivered instead which is considered to be acceptable in this instance.

Design and Streetscene

Policy BCS21 of the Bristol's Core Strategy expects a high-quality design in all developments, which contributes positively to an area's character and identity, creating or reinforcing local distinctiveness.

Specifically in relation to infill development, Policy DM26 of the Site Allocations and Development Management Policies, requires development to respond appropriately and respond to local patterns of development. It also expects development to respond appropriately to the height, scale, massing, shape, form, and proportion of existing buildings, building lines and setbacks from the street, skylines and roofscapes. Development is expected to reflect locally characteristic architectural styles, rhythms, patterns, features and themes taking account of their scale and proportion. It says development will not be permitted if it would be harmful to the local character or where it fails to take opportunities to improve it.

Policy DM27 (Layout and Form) requires the height, scale, and massing of development to be appropriate to the immediate context, site constraints, character of adjoining streets and spaces, the setting, public function and/or importance of the proposed development and the location within the townscape.

Policy DM30 requires alterations to existing buildings to respect the overall design and character of the host building, its curtilage and the broader streetscene. As such the extensions should be physically and visually subservient to the host building, including its roof form, and not to dominate it by virtue of its scale. It also requires sufficient external private space to be left for the occupiers of the building.

Application 19/02665/F for the proposed redevelopment of 66 Church Road was refused on design grounds, specifically that "The proposed development, by virtue of its height, scale, massing, form, plot coverage and overall design would fail to respond to its local context and street scene and would appear as an incongruous form of overdevelopment that would not contribute positively to the area's character and identity."

Whilst an acceptable design and layout was achieved through the granting of application 21/04754/F relating to 66 - 70 Church Road, the design proposed under the current scheme is not considered to be of sufficient quality. With reference to the above policies it is considered that the proposed development, by virtue of its height, scale, massing, form, plot coverage and overall design would fail to respond to its local context and street scene and would appear as an incongruous form of overdevelopment that would not contribute positively to the area's character and identity.

The layout and form of the development would prejudice the existing and future development potential of the adjoining site at 68-70 Church Road and the potential for the area to achieve a coherent, interconnected and integrated built form.

Refusal on design grounds would therefore be recommended.

Residential Amenity

Bristol City Council Site Allocations and Development Management (2014) Policy DM2 states that houses in multiple occupation will not be permitted where:

i. The development would harm the residential amenity or character of the locality as a result of any of the following:

- Levels of activity that cause excessive noise and disturbance to residents; or
- Levels of on-street parking that cannot be reasonably accommodated or regulated through parking control measures; or
- Cumulative detrimental impact of physical alterations to buildings and structures; or
- Inadequate storage for recycling/refuse and cycles

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

- Exacerbating existing harmful conditions including those listed at (i) above; or
- Reducing the choice of homes in the area by changing the housing mix.

Where development is permitted it must provide a good standard of accommodation by meeting relevant requirements and standards set out in other development plan policies.

Adopted Bristol Core Strategy Policy (2011) BCS18 makes specific reference to residential developments providing sufficient space for everyday activities and space which should be flexible and adaptable. In addition, Policy BCS21 sets out criteria for the assessment of design quality in new development and states that development will be expected to create a high-quality environment for future occupiers and safeguard the amenity of existing development. An HMO at this site may require a Mandatory License under the Housing Act 2004. The Local Authority also has adopted amenity standards which apply to HMOs under this separate legislative framework. Whilst it is recognised that this is non-planning legislation and therefore not a material consideration in planning decision making, these standards also provide an indication of the standard of accommodation expected within shared occupancy housing locally.

Policy DM30 requires alterations to existing buildings to safeguard the amenity of the host premises and neighbouring occupiers. Policy BCS23 in the Bristol Core Strategy and Policy DM35 in the Site Allocations and Development Management Policy also state that new development should also not lead to any detrimental increase in noise levels.

Policy BCS21 in the Bristol Core Strategy advocates that new development should deliver high quality urban design and safeguard the amenity of existing development. Policy DM29 in the Site Allocations and Development Management Policies, states that proposals for new buildings will be expected to ensure that existing and proposed development achieves appropriate levels of privacy, outlook, and daylight. This policy, as well as DM27, further states that new buildings will be expected to ensure that existing and proposed development achieves appropriate levels of privacy, outlook, and daylight. Policy BCS23 in the Bristol Core Strategy and Policy DM35 in the Site Allocations and Development Management Policy also state that new development should also not lead to any detrimental increase in noise levels.

The proposed extensions would increase the overall scale and massing of built form on the site.

Concern is raised regarding the impact on adjacent sites, notably 68-70 Church Road and future development potential (the previously approved scheme included a portion of the building that

was set back from the boundary) and the occupiers of 1-4 Cowper Street – by reason of the height, scale and massing of the proposed development and proximity to the boundary. Refusal is therefore recommended on this basis.

It is recommended that the proposal is also assessed as to compliance with the Nationally Described Space Standards and acceptable living conditions including light and outlook.

Transport and Highways

Policy DM2 in the Site Allocations and Development Management Policies (2014) states that subdivision of dwellings into house in multiple occupation will not be permitted where the development would harm the residential amenity or character of the locality as a result of levels of on-street parking that cannot be reasonably accommodated or regulated through parking control measures; as well as inadequate storage for recycling/refuse and cycles.

Policy BCS10 in the Bristol Core Strategy (2011) 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, and should be designed to ensure streets where traffic and other activities are, are integrated and designed to ensure the provision of safe streets.

Policy DM23 within the Site Allocations and Development Management Policies (2014) states that the provision in new development of secure, well-located cycle parking can be very important in encouraging people to cycle regularly. It is important that development proposals incorporate these facilities and parking at the outset of the design process. Applicants should refer to the council's 'Guide to Cycle Parking Provision' for guidance on this matter.

Policy BCS15 in the Bristol Core Strategy (2011) states that all new development will be required to provide satisfactory arrangements for the storage of refuse and recyclable materials as an integral part of its design.

Policy DM32 in the Site Allocations and Development Management Policies (2014) states all new developments will be expected to provide recycling facilities and refuse bins of sufficient capacity to serve the proposed development. This policy further states that the location and design of recycling and refuse provision should be integral to the design of the proposed development. In assessing recycling and refuse provision, regard will be had to the level and type of provision, having regard to relevant space standards; and the location of the provision, having regard to the need to provide and maintain safe and convenient access for occupants, while also providing satisfactory access for collection vehicles and operatives.

Consultation has been undertaken with the Council's Transport Development Management team and no objections are raised – please see their comments attached for full details.

6. Conclusion

Accordingly, whilst the benefits of the scheme in terms of development and housing delivery are noted, the concerns regarding the scheme are considered to be significant and outweigh these benefits. Accordingly, following the assessment above, the LPA would recommend that the application is refused for the reasons below. In the event that the Inspectorate consider that permission should be granted for this Section 62A application, please see the report for the

previously approved scheme relating to 66 - 70 Church Road (21/04754/F) and the comments received from consultees for suggestions as to conditions on a without prejudice basis.

Reasons for Refusal:

1. The proposed development, by virtue of the height, scale, massing and proximity to the boundary would result in a bleak, over dominant and overbearing increased sense of enclosure for residents of 1-4 Cowper Street. The development would also overbear 68 Church Road and impair outlook from windows within that property facing the development. As such, the development would fail to safeguard the amenity of existing residential development, contrary to local plan policies BCS21 of the Core Strategy 2011, DM27 and DM29 of the Site Allocations and Development Management Policies 2014 and the NPPF.

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