

Section 62A Applications Team
The Planning Inspectorate
Temple Quay House
2 The Square
Temple Quay
Bristol BS1 6PN

Our ref: PR002449

Date: 29 August 2025

Sent via email only

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Dear Sir/Madam,

Town and Country Planning Act 1990

Full planning application for 9 no. self-contained flats in upper floors of building. Retention of commercial uses at ground floor level.

286-292 Wells Road, Bristol BS4 2PU

INTRODUCTION

On behalf of our clients Empyrean Properties Limited, we apply for the following application:

"Full planning application for the conversion of upper floors of existing buildings (bank and ancillary office space (Use Class E(c(i))) to provide 9 no. self-contained flats, including refuse, recycling and cycle storage at ground floor level, partial demolition to rear ground floor level, first floor rear extension, removal of hipped roof to rear extension, and erection of a mansard roof extension. Sub-division of existing commercial unit at ground floor level to create 2no. commercial units, and installation of replacement shopfronts."

The application is submitted for the change of use of the above site, previously in use as a branch of the Nat West bank and ancillary office accommodation, (Class E(c(i))) to provide 9no. self-contained flats with the retention of the ground floor in commercial use (as opposed to the change of use of the whole building as approved.

We can confirm that the development would be CIL liable, as discussed later in this letter. This letter should be considered a proportionate Heritage, Planning, Design, and Access Statement.

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The following documents accompany this application:

- Completed Application Form and Ownership Certificates.
- CIL Form 1
- 2119-CMS-XX-XX-DR-A-PL01-P3_Proposed Location Plan
- 2119-CMS-XX-XX-DR-A-PL02-P1_Existing Site Plan
- 2119-CMS-XX-XX-DR-A-PL03-P3_Proposed Site Plan
- 2119-CMS-XX-XX-DR-A-PL04-P1_Level 0 - Existing Plan
- 2119-CMS-XX-XX-DR-A-PL05-P1_Level 1 - Existing Plan
- 2119-CMS-XX-XX-DR-A-PL06-P1_Level 2 - Existing Plan
- 2119-CMS-XX-XX-DR-A-PL07-P1_Level 3 - Existing Roof Plan
- 2119-CMS-XX-XX-DR-A-PL08-P1_Existing West Elevation
- 2119-CMS-XX-XX-DR-A-PL09-P1_Existing South Elevation
- 2119-CMS-XX-XX-DR-A-PL10-P1_Existing East Elevation
- 2119-CMS-XX-XX-DR-A-PL11-P1_Existing Courtyard Elevations
- 2119-CMS-XX-XX-DR-A-PL20-P6_Level 0 - Proposed Plan 9 units
- 2119-CMS-XX-XX-DR-A-PL21-P6_Level 1 - Proposed Plan 9 units
- 2119-CMS-XX-XX-DR-A-PL22-P6_Level 2 - Proposed Plan 9 units
- 2119-CMS-XX-XX-DR-A-PL23-P4_Level 3 - Proposed Roof Plan
- 2119-CMS-XX-XX-DR-A-PL24-P7_Proposed West Elevation
- 2119-CMS-XX-XX-DR-A-PL25-P9_Proposed South Elevation
- 2119-CMS-XX-XX-DR-A-PL26-P6_Proposed East Elevations
- 2119-CMS-XX-XX-DR-A-PL27-P5_Proposed Courtyard Elevations
- 2119-CMS-XX-XX-DR-A-PL29-P4_Proposed Typical windows and doors
- J7741 286-292 Wells Road - Energy & Sustainability Statement - P01 – 20250820
- Waste management strategy
- Heritage impact assessment

The remainder of this letter explains how the proposal addresses the key legislation and how the proposal complies with the planning policy framework.

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SITE AND LOCAL CONTEXT ASSESSMENT

The application site comprises the former Nat West Bank on Wells Road, a part two, part three-storey building on the corner of Wells Road and Greenmore Road, in the Knowle area of Bristol. The use of 286 Wells Road as a bank was first approved in 1961 and extended into the remainder of the building in 1970 and 1972. All recent applications generally relate to advertisements, access arrangements, and the shopfront, including an application to remove an ATM in 2018 (the most recent application). The upper floors comprise ancillary office accommodation to the ground floor bank.

The site is in Flood Zone 1, outside of any Conservation Area, there are no Tree Preservation Orders on the site, and the building is not nationally listed. It falls within the Wells Road/Broad Walk designated Town Centre and is also designated as secondary shopping frontage.

PLANNING HISTORY

Prior approval was granted on 23 January 2025 for reference 24/04839/CU, permitting the change of use of the building from Commercial, Business and Service (Use Class E) to Dwellinghouses (Use Class C3) under the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended), Schedule 2, Part 3, Class MA. This serves as the fallback position. The applicant has subsequently chosen to extend the roof the building and retain commercial uses at the ground floor level.

THE PROPOSAL

The application seeks full planning permission for a comprehensive conversion of the upper floors of the building, previously occupied as a bank and ancillary office space (Use Class E(c)(i)), to create a total of 9 self-contained residential flats.

This includes provision for refuse, recycling, and cycle storage facilities at ground floor level to serve the new dwellings.

The proposal retains active commercial uses at ground floor level, securing the active/retail function of the Wells Road/Broad Walk Town Centre, with the existing single unit sub-divided into 1 no. 64sqm and 1 no. 154sqm units, and new shopfronts provided.

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Notably, the scheme incorporates the addition of a mansard roof to the southern part of the building, providing space for two of the proposed residential units. It is also proposed to demolish a rear ground floor extension to make way for an external cycle store, to erect a first floor rear extension (above an existing flat-roofed outrigger), to replace the hipped roof to the two-storey rear extension with a flat roof, and to erect a refuse and recycling store, accessed from Greenmore Road, for both the commercial and residential units.

The schedule of accommodation is as follows:

Floor	Unit	Type	Beds (B)	Persons (P)	GIA / Area
Ground Floor	Commercial Unit 1	Commercial			154 sq m
Ground Floor	Commercial Unit 2	Commercial			63 sq m
Ground Floor	Flat 1	Flat	1B	1P	48 sq m
Ground Floor	Flat 2	Flat	2B	3P	61 sq m
First Floor	Flat 3	Flat	1B	1P	42 sq m
First Floor	Flat 4	Flat	2B	3P	61 sq m
First Floor	Flat 5	Flat	1B	1P	39 sq m
First Floor	Flat 6	Flat	1B	1P	40 sq m
First Floor	Flat 7	Flat	1B	1P	39 sq m

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Second Floor	Flat 8	Flat	1B	1P	48 sq m
Second Floor	Flat 4	Flat	2B	4P	73 sq m

RELEVANT LEGISLATION

- National Planning Policy Framework – December 2024
- Bristol Local Plan Comprising Core Strategy (Adopted June 2011),
- Site Allocations and Development Management Policies (Adopted July 2014)

ANALYSIS

Principle of Development

It is important to note that Bristol City Council is currently unable to demonstrate a five-year housing land supply (5YHLS) and have failed the Housing Delivery Test on past results. As required by paragraph 74 of the National Planning Policy Framework. This shortfall triggers the application of the presumption in favour of sustainable development, commonly referred to as the 'tilted balance' under paragraph 11(d) of the NPPF. In such circumstances, planning policies that restrict the supply of housing are deemed out-of-date, and planning permission should be granted unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework as a whole.

The site is previously developed land located in South Bristol, consistent with policies BCS1, BCS5, and DM1. Paragraph 125(c) of the NPPF states that significant consideration should be given to the use of brownfield land within settlements for residential development. Additionally, paragraph 128 indicates that local planning authorities should take a positive approach to applications proposing alternative uses for developed land not allocated for a specific purpose when it helps to meet identified development needs. In particular, proposals to convert retail and

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employment land to residential use in areas with high housing demand should be supported, provided this does not negatively affect key economic sectors or sites, town centre vitality and viability, and remains compatible with other Framework policies. The application site and current proposals are aligned with these national policy objectives.

Moreover, the site is immediately close to local services and transport routes, being a designated second-tier centre, and is therefore a location that is suitable for increased residential densities. There should be no in-principle objection to residential development on this PDL site, and in this regard, the proposals are in accordance with the objectives of policies BCS5, BCS7, and BCS20 of the adopted Local Plan as well as SADMP Policy DM1 which supports residential development.

Prior approval 24/04839/COU has already established this principle. The proposal adds nine new dwellings to the existing residential area, modestly contributing to housing supply and fully supporting residential use at this site, whilst retaining a commercial use within the designated town centre; this weighs positively in favour of the development when compared with the prior approval consent, which would see the loss of the ground floor commercial uses.

Design & Character

The relevant considerations include Section 12 of the National Planning Policy Framework (NPPF), Policy BCS21 (Quality Urban Design) of the Bristol Core Strategy (2011), as well as Policies DM26 (Local Character & Distinctiveness), DM27 (Layout & Form), and DM29 (Design of New Buildings) within the Site Allocation and Development Management Policies (2014).

The proposal aims to renovate and convert the building, adding a mansard roof to the southern section for two more apartments, and a rear extension at first floor level, to provide a third apartment (and more spacious apartments at first floor level when compared with the extant prior approval). Paragraph 125 e) of the NPPF encourages using airspace above existing properties for housing, including upward extensions like mansard roofs, provided designs match local surroundings, meet design standards, and ensure safe access.

A contemporary mansard roof design above existing commercial units has been successfully implemented on the site opposite (on the corner of Wells Road and Redcatch Road), and the current proposal seeks to mimic this in appearance and palette. The rear extension meanwhile

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would replicate the existing outriggers fronting Greemore Road, with buff brick and sash windows proposed. The hipped roof to the two-storey rear outrigger would be replaced with a flat roof and parapet wall, finished in Ashlar stone to match the shopfront, and this roof would be carried through to the first floor extension.

The proposal is entirely in keeping with the existing streetscene and therefore complies with the policies outlined above.

Amenity

The following apply: Policy Section 12 of the NPPF; Policy BCS21 (Quality Urban Design) of the Bristol Core Strategy (2011); DM29 (Design of New Buildings) of the Site Allocation and Development Management Policies (2014)

The current proposal is similar to the scale and massing of the existing building and surrounding properties, and the extensions are positioned at a distance from adjacent dwellings to ensure that there will not be any unacceptable levels of overlooking with windows looking towards the blank side gable of the property on Greenmore Road, or to the north, across the rear of the commercial units on Wells Road.

The mansard extension has been designed and arranged to avoid direct overbearing effects, overshadowing, or loss of light and outlook for neighbouring dwellings. A communal amenity area is proposed at first floor level, with screening to ensure that the amenity of rear gardens to Greenmore Road (which in any case, would be at oblique angles to the area).

Regarding local impact, the proposal complies with policies BCS21 of the Bristol Development Framework Core Strategy (June 2011), as well as DM27 and DM29 of the Bristol Local Plan - Site Allocations and Development Management Policies (July 2014).

Future Living Environment

The following policies are relevant: Section 12 of the NPPF; Policy BCS18 (Housing Type) of the Bristol Core Strategy (2011); DM29 (Design of New Buildings) within the Site Allocation and Development Management Policies (2014); and the Department for Communities and Local

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Government (DCLG) Nationally Described Space Standards for new housing, published in March 2015.

The proposal adheres to the minimum space standards, and each habitable room benefits from adequate natural daylight.

In an improvement to the prior approval scheme, and as noted above, a private roof top communal amenity area is proposed to the rear, with screening to preserve amenity of occupiers of Greenmore Road, and flats within the scheme. Notwithstanding, the site is within a short walk of Redcatch Park (designated Important Open Space). Overall, the scheme will provide a satisfactory quality of living environment for all future occupants.

Transport

Section 9 of the NPPF and Policies DM23 and DM32 are relevant.

The site is situated within a sustainable area regarding transport connectivity, including access to bus routes and the cycle network. It is considered unlikely that the development would generate vehicle ownership levels that adversely affect highway safety, and in any case, the principle of 9no. flats has been established through the prior approval.

The site is located in a highly accessible part of Bristol, making it an excellent choice for those who value easy access to public transport and local amenities. The area is well-served by multiple bus stops within walking distance, including Greenmore Road—right at the site itself—Broad Walk Shops, Beaconsfield Road, Greenleaze, and Greenwood Road. These stops provide convenient links to both local destinations and wider city routes. For travelling by train, Bedminster Station is approximately 1.5 miles away and offers local rail services, while Bristol Temple Meads, just about 2 miles from the site, connects travellers to national rail routes throughout the UK.

As noted earlier, the site also falls within a designated town centre, thereby ensuring easy access to a wide range of facilities and services, further supporting car-free living.

The scheme proposes zero car parking spaces, which is consistent with the Council's maximum parking standards. Cycle storage provision complies with the minimum requirements outlined in Appendix 2 of the Site Allocations and Development Management Policies Plan (2014).

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The proposal includes suitable waste and recycling storage for both residents and commercial operators, ensuring the development does not result in highway safety concerns related to waste containers being left on the public highway.

Sustainability

Policies BCS13 - BCS15 of the Bristol Core Strategy Climate Change and Sustainability Practice Note (2020) are relevant.

The submitted energy and sustainability statement (prepared by Max Fordham Consultancy) has demonstrated how the development will provide sufficient renewable energy generation, through solar panels and Air Source Heat Pumps, to reduce carbon dioxide emissions from residual energy use in the buildings by 67%, exceeding the 20% policy requirement.

The application is therefore considered acceptable on these grounds, and compliance with the Energy Statement can be conditioned.

Other Matters

The site is previously developed land with no discernible biodiversity. On this basis the applicant has claimed the de minimis exemption with regard to biodiversity net gain legislation.

THE PLANNING BALANCE

In summary, the proposed development aligns with current national and local planning policies regarding parking, sustainability, and environmental considerations.

The fallback position allows for the conversion of existing buildings into nine residential apartments. This scheme optimises urban land use by introducing a Mansard roof, which facilitates efficient delivery of accommodation while maintaining the commercial units that contribute to the vitality and viability of the frontage—a notable advantage compared to the fallback scenario.

The National Planning Policy Framework (NPPF) emphasises the substantial weight afforded to developments providing housing in urban areas on previously developed land. Furthermore,

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additional positive consideration should be given to the delivery of homes in light of the current housing shortfall.

By meeting or exceeding established standards for cycle storage, renewable energy provision, and waste management, the scheme not only fulfils statutory requirements but also demonstrates a commitment to sustainable development. Taking these factors into account, the application is considered well justified and appropriate within the context of the site and its policy framework.

The benefits of this proposal substantially outweigh any negative impacts, and it is therefore respectfully requested that planning permission be granted.

If there any further information is required in order to clarify the above, please contact us as soon as possible so that we are able to provide this prior to a decision being made.

Yours faithfully,

STOKES MORGAN PLANNING LTD