

Proposed Use Class B2 Commercial Units at:  
**6-8 Emery Road, Brislington, Bristol, BS4 5PF**

**Planning, Design & Access Statement**



*Planning Agent*

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Prepared on behalf of:

**Trustees of AMP Electrical Retirement Benefits Scheme**

# Introduction

## 1.1 Overview

This statement is submitted in support of a Full Planning Application with proposals to develop 5no. Use Class B2 General Industrial units within the site.

It provides the background to the scheme and explains the proposed development, as well as how issues relating to access have been considered. The final section outlines the planning justification for the development based on the local and national policy context, and material considerations.

It should be read alongside the drawings and documents listed in the covering letter.

## 1.2 Location

The site is located at the prominent junction of Emery Road and Broomhill Road, on the edge of the Brislington Trading Estate, towards the south eastern extent of city. It is centred on National Grid Reference ST 62730 70324 (figure 1).

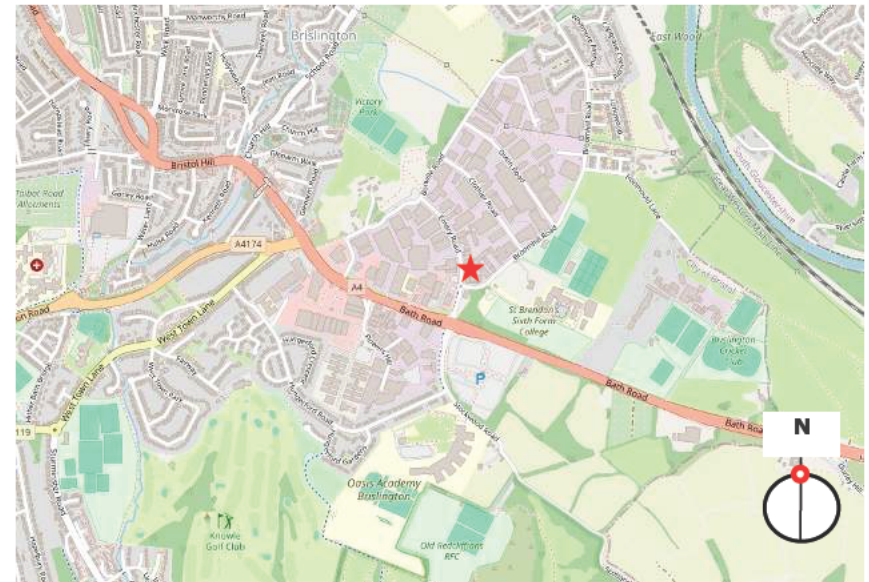


Figure 1. The site location (red star) within the Brislington Trading Estate.

## The Site & Context

### 2.1 The site

The 0.43 ha. site is accessed from gated vehicle entrances off Emery Road and Broomhill Road. Within the site, surrounded by hardstandings and contained by boundary fencing and walls is a mid-1950s a brick and rendered extended industrial building.

The building is arranged over a couple of levels and has a gross internal floor area of c. 1326 sqm. It has been extended with various additions and projecting from the rear is a large single storey asbestos roofed industrial shed. This has also been extended on one side.

The hardstandings provide generous space for a number of vehicles to park and manoeuvre within the site so they can exist in a forward gear.

Along the north western boundary are a mix of trees, details of which are provided in the accompanying Arboricultural Report. The site shares boundaries with other industrial units to the north and north west.

In the wider context and beyond the trading estate, to the south east on the far side of Broomhill Road is the campus of St Brendan's Sixth Form College.

The Valuation Office Agency's Business Rates classification lists the building as 'workshop and premises'.

Photographs of the site and its immediate context are provided on the following pages.



Photos 1 & 2. Aerial views of 6-8 Emery Road.





Photos 3-5. The developed Emery Road site, frontage onto Emery Road and vehicular accesses into the site.



Photos 6-8. Views of the enclosed yard spaces that are accessed from Emery Road. The building within the site is seen in the left-hand picture.





Photos 9-13. Views of the Broomhill Road frontage, existing access, and yard space. The images also show a raised area at the rear of the site where a small number of trees are planted. These trees are located outside the defined red line application area.

## 2.2 Planning History

According to the Council's online planning records, there is limited planning history for the site, with only one application listed. This relates to a 2023 submission (reference 23/04491/F) which sought permission for the demolition of the existing buildings and the construction of new Class E(g), B2 and B8 industrial units. Consent was granted, subject to conditions, in January 2025. The current owners have confirmed that they do not intend to implement this scheme.

## 2.3 Planning Policy and Technical Designations

As shown on the Council's Site Allocations and Development Management Policies Map (Figure 2), the site is allocated as a Principal Industrial and Warehousing Area (PIWA) within the Local Plan. It lies adjacent to designated open space, a conservation area, and the Green Belt.

The site also falls within Bristol's Inner East Regeneration Area, which covers the Ashley, Easton and Lawrence Hill Wards. The Council regards this area as one where they wish to "...embrace the opportunities for change and regeneration..." (Bristol Core Strategy: Spatial Vision and Objectives). There is a clear aspiration, inter alia, to address issues of employment, income, education, and skills deprivation.

Much of St Philip's Marsh, including the application site, is designated as a Principal Industrial and Warehousing Area, with protection afforded under Core Strategy Policy BCS8: Delivering a Thriving Economy and Policy DM13: Development Proposals on Principal Industrial and Warehousing Areas of the Site Allocations and Development Management Plan.

According to the Coal Authority's mapping, the site lies within a low-risk coal mining area (Figure 3). Government flood mapping identifies the site as being within Flood Zone 1.

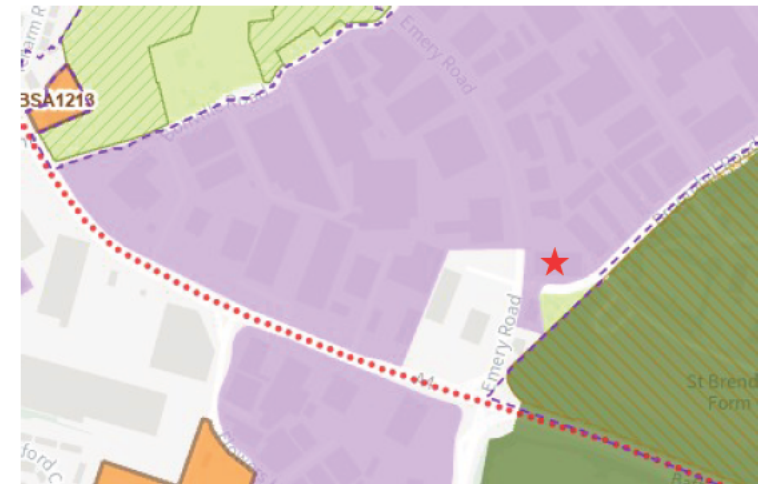


Figure 2. Extract from the Site Allocations and Development Management Policies Map showing the site (red dot) on the northern edge of the St Philip's Marsh Principal Industrial and Warehousing Area.



Figure 3. Extract from The Coal Authority online interactive map showing the site (red dot) not within a 'Development High Risk Area'.



## The Proposals

### 3.1 Land Use and Amount

The applicants propose the creation of several commercial units designed to support the establishment and growth of small businesses. A total of 5 no. Use Class B2 (General Industrial) units are proposed, arranged across two blocks.

Block 1 will comprise a row of four units that will site along the north west boundary of the out yard. Each will be arranged over two levels and will have c. 106.4sqm floor space with open-plan accommodation, but with the first-floor having welfare facilities.

Each unit will be accessed via either a pedestrian door or a large roller shutter to allow vehicles to enter.

Unit 5 will be a standalone building of similar design, located to the rear of the existing building. It will provide approximately 112 sqm of internal floorspace and similar access arrangements.

The total new floorspace proposed amounts to 465.2 sqm. The existing building on the site will be retained and is to undergo major refurbishment prior to being re-let to future tenants.

### 3.2 Access and Car Parking

Access to the site will continue to be taken from the existing dropped kerbs and crossovers.

Each unit will be allocated dedicated parking, with provision for both cars and light goods vehicles. In total, 13 parking spaces are proposed. Sufficient circulation space within the site will allow vehicles to manoeuvre and exit in a forward gear.

### 3.3 Design, Appearance, Layout and Form

The proposed buildings are designed to be durable, functional, and low-maintenance, reflecting their commercial use.

- External finishes will comprise red brick plinths (to a height of 2m) with grey profiled metal cladding above.
- Roofs will be mono-pitched and finished in profiled metal sheeting.
- Rooflights will be incorporated to maximise natural light, and solar panels will be integrated into the roof design.

### 3.4 Sustainable Design

The new units are designed to be thermally efficient and to align with relevant Council sustainability policies. Each unit will be fitted with renewable energy technologies, including air source heat pumps and solar PV panels.

A separate Sustainability & Energy Statement accompanies this application, confirming that the development will achieve a 20% reduction in residual carbon emissions through the use of renewable technologies.

### 3.5 Surface Water and Foul Drainage

The existing site drainage has been assessed by specialist consultants, with a copy of their report submitted alongside this application.

To comply with adopted policy and best practice guidance, measures are proposed to reduce the rate of surface water run-off. A sustainable urban drainage system (SuDS) is proposed, comprising a below-ground attenuation tank with a flow-control device to restrict discharge to the existing public sewer.

### 3.6 Refuse and Recycling

Space will be provided within the site for the storage of general waste and recyclables. As individual occupiers will have varying operational needs, tenants will be responsible for arranging their own waste and recycling provision via commercial collection services.

### 3.7 Cycle Storage

Secure, weatherproof cycle storage will be provided on site, as indicated on the submitted plans. Provision is made for 4 no. bicycles.

# Planning Balance

## 4.1 Planning Policy Overview

The applicants propose the creation of new commercial units to address a recognised shortfall in the availability of small B2 accommodation within the local area. They are confident that there is strong demand for such space and intend to deliver flexible, high-quality commercial premises designed to support the growth of local businesses and stimulate further employment opportunities.

As the site is located within a designated Principal Industrial and Warehousing Area (PIWA), which the council recognises as being of strategic importance to the city's economy, it is deemed entirely appropriate for the proposal.

In terms of the Bristol Development Plan, Core Strategy Policy BCS8: Delivering a Thriving Economy is directly relevant. The policy's introduction confirms its objective to deliver "new premises for employment across the city to support its continuing economic growth and competitiveness." Specifically, BCS8 states that:

*'The economic performance of the city will be strengthened by providing a sufficient and flexible supply of employment land, addressing barriers to employment and promoting the city as a place to invest. ... Principal Industrial and Warehousing Areas will be identified and retained for industrial and warehousing uses.'*

Further explanatory text under the heading 'Retaining Employment Land' reinforces the importance of these areas:

*'The city's Principal Industrial and Warehousing Areas represent Bristol's essential core provision of industrial and warehousing land. Retaining these strategically important areas will help the city meet the latent and future demand for industrial and warehousing development.'*

Development Management Policy DM13: *Development proposals on Principal Industrial and Warehousing Areas* states that the city's PIWAs will be retained for industrial and warehousing uses and that their designation reflects the National

Planning Policy Framework's requirement that local planning authorities should 'support existing business sectors ...'

In addition, Development Management Policy DM13: Development Proposals on Principal Industrial and Warehousing Areas stipulates that PIWAs will be retained for industrial and warehousing uses, and confirms that their designation aligns with the National Planning Policy Framework (NPPF) requirement for local planning authorities to "support existing business sectors."

Furthermore, the proposal aligns with the aims of the National Planning Policy Framework (2024), particularly:

- Paragraph 86, which places significant weight on the need to support economic growth and productivity, and encourages development to meet the needs of a modern economy—including flexible logistics, manufacturing, and digital infrastructure;
- Paragraph 87, which highlights the importance of addressing the specific locational needs of key business sectors, particularly in areas of strategic employment value such as PIWAs.

These provisions underline the importance of facilitating development that supports local and regional economic objectives through appropriate employment land supply.

While the NPPF also includes policies (Paragraphs 155–158) on the reuse of Green Belt and Grey Belt land, these are not engaged in this case as the site is not designated as such. However, those paragraphs further support the principle that development proposals addressing unmet economic need in sustainable locations should be given significant weight in the decision-making process.

## 4.2 Design and Sustainability

The buildings are designed to be functional and have durability given the nature of their use. Their appearance reflects their intended use and is appropriate for the prevailing character of the area and context.

They are also designed to incorporate sustainable construction principles along with the inclusion of renewable energy sources. To this end and as demonstrated by the accompanying Sustainability Statement and Energy Assessment, where practicable, comply with Core Strategy Policies BCS13 (Climate Change), BCS14 (Sustainable Energy), and BCS15 (Sustainable Design and Construction).

In line with the minimum requirements of Policy BCS14, the development achieves a reduction of at least 20% in residual carbon dioxide emissions. This has been accomplished through the incorporation of renewable energy systems, which will significantly enhance the environmental performance of the buildings.

The accompanying Outline Drainage Strategy details the proposals for SUDs principles to be utilised, with below ground attenuation to be installed. The proposals are considered to comply with the spirit of Core Strategy BCS16: *Flood risk and water management*.

## 4.3 Access and Movement

There'll be no change to the existing access arrangements nor it likely that a material increase in the frequency of vehicles accessing the site. As such, there will be no consequential impact on the local highway network arising from the proposed development and that there should arise no particular safety concerns.

The enhanced cycle storage provision and associated staff facilities will promote active travel.

The proposed development is deemed to be compliant with the principles of Policy BCS10: *Transport and Access Improvements* which identifies a number of development principles, that promote in a sequential list sustainable forms of transport, prioritising walking and cycling over public transport and private motor vehicles.

## 4.5 Coal Mining

The Coal Mining Risk Assessment that accompanies the application has assessed the potential risk from legacy coal mining. It has identified a degree of risk and advised that further site investigation work is necessary with a minimum of two rotary open holes drilled to a depth of 30m on site, particularly in the area of the proposed building as well as trial pitting/trenching across the site.

They have advised that in the circumstance, *'despite the proposed ground investigation works recommended above, we see no reason why Planning Permission should not be granted in the interim (with respect to coal mining legacy issues) with the proposed mitigation works forming a condition on the planning approval.'*

## 4.6 Trees

The existing trees on the edge of the site have been assessed by an arboriculturist and advice in the accompanying report demonstrates there will be no impact on them arising from the development.

## 4.7 Biodiversity

In accordance with Schedule 7A of the Town and Country Planning Act 1990, as inserted by the Environment Act 2021, proposals submitted from April 2024 are required to demonstrate a measurable Biodiversity Net Gain (BNG) unless exempt.

In this instance, the proposed development does not result in the loss or degradation of any existing habitat. The only physical works to external areas relate to existing hardstandings. On this basis, the proposals fall below the relevant threshold outlined in government guidance. As such, the development is considered to be de minimis in terms of habitat impact and is therefore exempt from the requirement to provide a BNG assessment under the current regulatory framework.

## 4.8 Conclusion

This statement, together with the supporting documentation, provides a clear and robust justification for granting planning permission in terms of land use planning and the physical development.

The proposed commercial units will deliver much-needed, quality commercial accommodation in an accessible location. It represents a sustainable form of development that are entirely appropriate for the designated PIWA. The



development will result in tangible economic, social and environmental benefits. The expanded employment provision will potentially positively contribute to creating employment opportunities.

As the proposals accord with the council's land use policies and principles of sustainable development, there are sound reasons for the application to be supported and approved at the earliest opportunity.

In conclusion, the proposals are considered to be entirely appropriate for the site and context. On this basis, we respectfully request that, taking into account the justification and information provided, the Inspectorate supports this application and grants planning permission.