



Decision Notice and Statement of Reasons

Decision By Zoe Raygen DipURP MRTPI

Site visit undertaken on 1 October 2025

A person appointed by the Secretary of State

Decision date: 30 October 2025

Application Reference: S62A/2025/0118

Site address: 11-13 Whiteladies Road, Clifton, Bristol BS8 1PB

- The application is made under section 62A of the Town and Country Planning Act 1990.
 - The site is located within the administrative area of Bristol City Council.
 - The application dated 30 July 2025 is made by Urban Creation (11-13WLR) Ltd and was validated on 20 August 2025.
 - The development proposed is for the change of use from office to provide 19 no purpose built student units and associated works.
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Decision

1. Planning permission is granted for the change of use from office to provide 19 no purpose built student units and associated works in accordance with the terms of the application dated 30 July 2025, subject to the conditions set out in the attached schedule.

Statement of Reasons

Procedural matters

2. The application was made under Section 62A of the Town and Country Planning Act 1990, which allows for applications to be made directly to the Planning Inspectorate where a Council has been designated by the Secretary of State. Bristol City Council (BCC) have been designated for non-major applications since 6 March 2024.
3. Publicity of the application has been carried out in the Bristol Evening Post. Consultation was undertaken on 26 August 2025 which allowed for responses by 24 September 2025. No responses from interested parties were received.
4. Bristol City Council (BCC) submitted comments on 24 September 2025 which indicated that concerns were raised regarding the living conditions for students

particularly in the basement rooms and the lack of level access into the building.

5. The response from BCC raised issues that required further information and/or revised plans. Having regard to the Wheatcroft/ Holborn Principles, I accepted additional plans dated 6 October 2025 in response to those comments and a targeted re-consultation of the relevant consultees only was carried out. The additional submission led to the agreement of an extension of time to the determination period to 31 October 2025. The amendment resulted in the reduction of proposed units at the property from 20 to 19 which is reflected in the banner heading above.
6. I carried out a site visit on 1 October 2025, which enabled me to view the site internally and externally as well as the surrounding area.
7. I have taken account of all written representations in reaching my recommendation.

Main Issues

8. Having regard to the application, the consultation responses, and the information from BCC, together with what I saw on site, the main issues for this application are:
 - Whether the proposal would provide acceptable living conditions for proposed occupiers;
 - the effect of the proposal on the special interest of the Grade II listed building 7-9 Whiteladies Road and the character and appearance of the Whiteladies Road Conservation Area (CA);
 - whether the proposal would result in an acceptable mix of uses in the area; and
 - the effect of the proposal on highway safety.

Reasons

Relevant Planning History and Background

9. The application property is a three storey semi-detached property set back from the road. It is currently vacant but has been used as an office. There is an annexe to the rear, used as an office, which is excluded from the application site. The site is accessed from Whiteladies Road. It is within the Whiteladies Road Conservation Area and near to 7-9 Whiteladies Road which are grade II listed buildings.
10. Planning permission has been granted for the change of use of the building to provide 20 short term lets/guesthouse/hotel (Use Class C1) and associated works in 2025¹. Prior to that prior approval was approved for the change of use

¹ 25/11594/F

of the property to 17 dwellinghouses². In addition planning permission was granted for external works to facilitate the 17 dwellinghouses³.

11. Planning permission is now sought for the change of use of the property to 19 units of student accommodation together with a secure cycle and refuse store, the addition of two lightwells, replacement of doors and stairs at the rear with Juliette balconies, PV panels and a rooflight, air source heat pumps, external insulation and a new parking layout.

Living conditions

12. Policy BCS18 of the Bristol Development Framework Core Strategy 2011 requires that residential developments should provide sufficient space for everyday activities and to enable flexibility and adaptability by meeting appropriate space standards. The Council's Space Standards Practice Note 2021 (the Practice Note) provides further information on the implementation of Policy BCS18. The conversion of a building to provide student accommodation should provide sufficient communal facilities and services sufficient to meet the requirements of the intended number of residents.
13. All of the rooms would meet the relevant space standards. However, those in the basement would mostly be served by one window only. That window would be within a lightwell. I saw at my site visit that the windows to the middle two studio rooms on the rear elevation would be more than sufficient to allow an acceptable level of light into the proposed rooms. There would also be an satisfactory level of outlook from the window above the wall of the lightwell.
14. The remaining rooms in the basement would be served by small windows which I saw currently provide very limited light into the rooms. However, the proposal includes the removal of the low ceilings, to restore the rooms to the original height, and the enlargement of the lightwell to the front and south side of the building, this would ensure that the two rooms on the front of the property as well as that to the south side (the proposed communal room) in the basement would receive adequate light and outlook.
15. The only remaining unit is a small basement studio on the north side, with just a small window facing east. This limits natural light and, together with the size of the room, offers a gloomy, oppressive living space. However, the proposal includes a large communal area that offers good light and outlook. Since this is just one unit with less ideal conditions, and future occupants would be aware of this and have access to the communal space, I'm satisfied that the overall living conditions would be acceptable for all residents.
16. Consequently, for the reasons above I conclude that the proposal would provide acceptable living conditions for future residents. It would therefore comply with policies BCS15, BCS18 and BCS21 of the Core Strategy as well as Policy DM2 of the Bristol Local Plan Site Allocations and Development Management Policies 2014 (the Local Plan) and paragraph 135 (f) of the

² 25/10493/COU (the prior approval)

³ 25/10495/F

National Planning Policy Framework (the Framework). Together these require that development provides sufficient space for everyday activities, meet relevant requirements and standards and a high standard of amenity for future users.

Principle of use

17. Policy DM12 of the Bristol Local Plan – Site Allocations and Development Management Policies 2014 (the Local Plan) seeks to retain valuable employment sites. I am mindful though that the property has already received two consents which would involve the loss of the offices. In any case, the applicant has submitted a report regarding a marketing campaign which took place between November 2024 and July 2025, so a significant period of time. There were no proceedable offers or interest from any commercial or employment occupiers. This is perhaps not unsurprising given that the building would not be easily adaptable to open plan use, or accessibility compliant, working space. This together with a lack of frontage and the inability to rent out on a floor by floor basis means that the property was not attractive to prospective enquirers. I am satisfied therefore that the proposal meets the requirements for Policy DM12 in that there is no demonstrable demand for employment uses for this building.
18. Policy BCAP4 of the Bristol Local Plan – Bristol Central Area Plan 2015 (the BCAP) states that 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. This is reiterated by Policy DM2 of the Local Plan which seeks to protect the local character and residential amenity of areas as well as the housing mix. The supporting text sets out that harmful concentrations are likely to arise when problems commonly associated with student accommodation cumulatively result in detrimental effects on residential amenity.
19. The emerging Local Plan also seeks to avoid an overconcentration of student accommodation. While this is at an early stage, it gives useful guidance as what could be considered as an over concentration within the city centre area where this proposal is located. As a guide the council considers that a local imbalance of purpose-built student accommodation is likely to occur where bed space numbers within 200 metres of the site (including the proposal) exceed a threshold of 1,000 bed spaces within the city centre's commercial areas and designated town centres. In all cases the proximity and concentration of houses in multiple occupation should also be considered. Assessments on whether an imbalance would occur should also consider the extent to which the development provides for a mix of uses, including residential, that contributes to the diversity of uses and housing choice within the area.
20. The applicant has submitted evidence confirming that the number of student and HMO bed spaces within 200 metres of the site is 440 which would be well below the 1000 threshold, including the application site.

21. The Council report that in its opinion and according to its records, there is a high concentration of student accommodation with in the locality. I saw at my site visit that, from external appearance only, there seemed to be a good number of properties used as HMO as well as purpose built student accommodation in the area. Of course not all HMO may be used for student accommodation, although given the proximity of the site to the Bristol University Precinct it is a distinct possibility.
22. Nevertheless, the proposed student housing would be detached from residential accommodation with properties either side being in commercial use and set some distance from the application site. Being located on a busy road, in a vibrant area, away from quieter residential areas, I am satisfied the proposal would not cause harm to the living conditions of existing residents.
23. The proposal is also close to the University of Bristol's Clifton campus in a mixed use area containing commercial and residential accommodation. The proposed use would add positively to that mix and not undermine the overall housing mix and balance of the community.
24. For the reasons above, I conclude the application site would be an appropriate location for the proposed use. There would be no conflict with policies DM2 and DM12 of the Local Plan and Policy BCAP4 of the BCAP.

Heritage assets

25. The CA is based on Whiteladies Road, a principal shopping street and route to the north out of the city centre. The Council's Enhancement Statement for the CA describes Whiteladies Road as conveying the impression of a gently curving road, built to a grand design, ascending between the 'town', represented by the Queens Road area, and the 'country' seen in terms of The Downs. It is generously proportioned but varied in character, with highly ornamented, large-scale, villa-type buildings set back from their boundaries, contrasting with the informal small-town character of the continuous shopping frontages in the Blackboy Hill section. There is also a denser terraced element linking the two. It is also distinguished in parts by being lined with mature plane trees.
26. This describes my findings on site. The road has a series of fine semidetached villa type buildings which are generously spaced and set back from the road, now often behind areas of hard surfacing used for car parking. Although there are different styles of architecture there is a unity from the predominant use of Bathstone and Brandon Hill rubble and the size and scale of the buildings and their fairly uniform layout. The street trees give a pleasant verdant appearance. The significance of the CA is largely drawn from the set back of the buildings from the tree lined road and the grand design linking the town to the country.
27. Nos 7 and 9 Whiteladies Road were originally constructed as a pair of houses in the mid nineteenth century from limestone ashlar with a slate hipped roof. They have a symmetrical front, and their significance derives from surviving architectural features which provide an attractive example of domestic architecture of the time. It is enclosed by a low wall providing the immediate

domestic setting. It is however appreciated from the street and is visible in views along the street with the application site.

28. The application property is a good example of a fine villa that sits back from the road contributing positively to the character and appearance of the CA, the streetscene and the setting of the adjacent listed building.
29. The proposed cycle parking and refuse storage areas would be located to the rear of site and therefore, would be in an unobtrusive location. The solar panels would be attached to the roof of the building such that they would not be visible from the street. The air source heat pumps would be located on the rear of the building away from public view. The proposed lightwells, alterations to windows and the addition of Juliette balconies would be carried out in a sympathetic manner and visually integrate acceptably into the building. The additional insulation to the external faces of the building would be covered with render as currently exists and therefore there would be no material change to the external appearance in this respect.
30. Therefore, the external alterations proposed would be minimal and carried out in a manner sympathetic to the character and appearance of the building, and the wider area. Consequently, the proposal would preserve the character and appearance of the CA and the setting of the listed building, preserving the significance of the heritage assets.
31. Accordingly, the proposal is in accordance with policies BCS21 and BCS22 of the CS, and policies DM26, DM27, DM30 and DM31 of the Local Plan which collectively seek to ensure the proposals preserve and where necessary enhance listed buildings and conservation areas, ensuring that high quality urban design is delivered.

Highway safety

32. The application site is located close to bus stops along Whiteladies Road and within walking distance to local services and facilities as well as the Clifton campus of the university. It is therefore in an accessible location where residents would not necessarily require access to a car.
33. However the proposal would provide 6 parking spaces including one disabled space which would accord with the Council's parking standards contained in the Local Plan. In addition 8 secure cycle parking spaces would be provided which would be an acceptable level of provision.
34. The site would be accessed via two entrances from Whiteladies Road as currently exists for the office use. Parking for the annexe to the rear would be retained. No objections are raised by the Highway Authority regarding the capacity of the highway network, and given the previous use of the site, I see no reason to disagree.
35. Although there is no level access into the building this could be secured by way of a condition requiring details to be submitted and approved. Furthermore

conditions could be attached to secure the specific detail of appropriate refuse and cycle stores for the development.

36. For the reasons above, I conclude that the proposal would not be harmful to highway safety and would provide an appropriate level of parking. There would therefore be no conflict with Policy BCS10 of the Bristol Development Framework Core Strategy 2011 (the CS) and policy DM23 of the Local Plan. Together these require that development ensures safe streets and not give rise to unacceptable traffic conditions and provide safe and adequate access to the highway.

Conclusion

37. I have considered the planning conditions suggested by BCC and I have had regard to the tests set out in the Framework. In the interests of precision and clarity I have amended the wording of the conditions suggested by the Council where they have been imposed.
38. In addition to the standard three-year time limit condition for the change of use; it is necessary to specify the approved plans in the interest of certainty.
39. A traffic management plan is needed to ensure highway safety during student drop off and pick up times. A condition requiring the implementation and retention of the car parking on site is necessary in the interests of highway safety.
40. Details of cycle parking are necessary to ensure there is sufficient provision for parking in association with the proposed use. Details of refuse storage are necessary to achieve highway safety and protect the character and appearance of the area.
41. Given the sensitivity of the end user it is necessary to impose a condition regarding contamination during construction works. A condition requiring external works to match existing is necessary to protect the character and appearance of the area and the CA.
42. A condition regarding noise from the air source heat pumps is necessary to protect residents' living conditions.
43. I have had regard to the comments of the Bristol Crime Prevention Unit regarding the imposition of a condition regarding a Student Management Plan. However, given the location of the proposal and that I have concluded that it would not be harmful to either the character of the area or residents' living conditions then the condition is not necessary.

Conclusion

44. For these reasons, and having regard to all other matters raised, the proposal accords with the development plan and therefore I conclude that planning permission should be granted.

Zoe Raygen

Inspector and Appointed Person

Schedule of Conditions

Conditions:

1. The change of use hereby permitted shall begin not later than three years from the date of this decision.

Reason: As required by section 51 of the Planning and Compulsory Purchase Act 2004.

2. The development hereby permitted shall be carried out in accordance with the following approved plans:

- Site Location Plan 600
- Proposed site plan 604
- Proposed Floor Plans 605 P2
- Proposed Elevations 606
- Existing and Proposed Section A-A 607
- Railing and Lightwell Details 608

Reason: To provide certainty.

3. No building or use hereby permitted shall be occupied or use commenced until a traffic management plan setting out the agreed arrangements for managing student drop off/collection procedures and location, at the start/end of semester/academic year, has been prepared, submitted to and approved in writing by the Local Planning Authority. The measures shall thereafter be implemented in accordance with the approved traffic management plan for the lifetime of the development.

Reason: To protect highway safety

4. No building or use hereby permitted shall be occupied or use commenced until the car/vehicle parking area (and turning space) shown on approved plan 604 has been completed and thereafter the area shall be kept free of obstruction and available for the parking of vehicles associated with the development. Driveways/vehicle parking areas accessed from the adopted highway must be properly consolidated and surfaced, (not loose stone, gravel or grasscrete) and subsequently maintained in good working order at all times thereafter for the lifetime of the development

Reason: To protect highway safety

5. No commencement of use of any air source heat pumps shall take place until an assessment on noise from the heat pump(s) at neighbouring properties has been submitted to and been approved in writing by the Local Planning Authority. If the assessment indicates that noise from the air source heat pump(s) is likely to affect neighbouring residential or commercial properties, then a scheme of noise mitigation measures shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of the development. The approved noise mitigation measures shall be implemented prior to the occupation of the property.

Reason: To protect neighbouring living conditions.

6. Prior to occupation, further details of refuse storage facilities shall be submitted to, approved in writing by the Local Planning Authority and installed. Thereafter, all refuse and recyclable materials associated with the development shall either be stored within this dedicated store/area, as shown on the approved plans, or internally within the building that forms part of the application site. No refuse or recycling material shall be stored or placed for collection on the adopted highway (including the footway).

Reason: To protect the character and appearance of the area and ensure appropriate facilities are available for residents.

7. Prior to occupation, further detailed drawings of the cycle storage at the scale of 1:10 shall be submitted to and be approved in writing by the Local Planning Authority before the development is occupied. The detail thereby approved shall be carried out in accordance with that approval.

Reason: To ensure the provision and availability of cycle parking

8. In the event that contamination is found at any time when carrying out the approved development, it must be reported immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken in accordance with DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11', and where remediation is necessary a remediation scheme must be prepared which ensures the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

Following completion of measures identified in the approved remediation scheme a verification report must be prepared, which is subject to the approval in writing of the Local Planning Authority.

Reason: To protect the living conditions of residents and to minimise risks to controlled waters, property and ecological systems from contamination.

9. All new external work and finishes and work of making good shall match existing original work adjacent in respect of materials used, detailed execution and finished appearance except where indicated otherwise on the approved drawings.

Reason: To protect the character and appearance of the area

END OF CONDITIONS

Informatives:

- i. In determining this application, the Planning Inspectorate, on behalf of the Secretary of State, has worked with the applicant in a positive and proactive manner. In doing so the Planning Inspectorate gave clear advice of the expectation and requirements for the submission of documents and information, ensured consultation responses were published in good time and gave clear deadlines for submissions and responses. A minor amendment was sought to make the application acceptable and clear deadlines were set for submission.
- ii. The decision of the appointed person (acting on behalf of the Secretary of State) on an application under section 62A of the Town and Country Planning Act 1990 ("the Act") is final, which means there is no right to appeal. An application to the High Court under s288(1) of the Town and Country Planning Act 1990 is the only way in which the decision made on an application under Section 62A can be challenged. An application must be made within 6 weeks of the date of the decision.
- iii. The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 is that planning permission granted for development of land in England is deemed to have been granted subject to the condition that development may not begin unless:
 - (a) a Biodiversity Gain Plan has been submitted to the planning authority, and;
 - (b) the planning authority has approved the plan.

The planning authority, for the purposes of determining whether to approve a Biodiversity Gain Plan, if one is required in respect of this permission would be Bristol City Council.

There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. This permission is considered to be one which will not require the approval of a biodiversity gain plan before development is begun because the following statutory exemption is considered to apply:

Development below the de minimis threshold, meaning development which:

- does not impact an onsite priority habitat (a habitat specified in a list published under section 41 of the Natural Environment and Rural Communities Act 2006); and;
- impacts less than 25 square metres of onsite habitat that has biodiversity value greater than zero and less than 5 metres in length of onsite linear habitat (as defined in the statutory metric).

- iv. These notes are provided for guidance only. A person who thinks they may have grounds for challenging this decision is advised to seek legal advice before taking any action. If you require advice on the process for making any challenge you should contact the Administrative Court Office at the Royal Courts of Justice,

Strand, London, WC2A 2LL (0207 947 6655) or follow this link:
<https://www.gov.uk/courts-tribunals/planning-court>

- v. Responsibility for ensuring compliance with this Decision Notice rests with Bristol City Council.

APPENDIX 1 Consultee responses

- Bristol Crime Prevention Unit
- Bristol City Council