

11-13 Whiteladies Road
Bristol BS8 1PB

Proposed Demolition of
Single Storey Office Annexe
and Development of
Four Holiday Lets

Heritage Statement

Project Ref: AH2330

September 2025



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Bristol BS8 1PB

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Single Storey Office Annex
and Development of
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Prepared by	■■■■■
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Approved	■■■■ (20/09/2025)

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1. SUMMARY

Project Name:	11-13 Whiteladies Road
Proposal:	Proposed Demolition of Single Storey Office Annexe and Development of Four Holiday Lets
Location:	Bristol BS8 1PB
NGR:	357841, 173532
Type:	Heritage Statement

This heritage statement has been completed in respect of a proposal for the development of a terrace of four holiday lets on land to the rear of 11-13 Whiteladies Road, Bristol, centred on NGR 357841, 173532.

The planning proposal would replace a low-quality late 20th century outbuilding and car park at the rear of 11–13 Whiteladies Road with a modest terrace of four holiday let cottages. This assessment has found that the special interest of the Whiteladies Road Conservation Area is derived principally from its 19th century townscape along the arterial frontage and the historic pattern of ancillary activity to the rear. The existing rear yard makes no positive contribution to that character or significance.

In relation to the adjacent Grade II Nos. 7–9 Whiteladies Road, the Listed Building’s significance lies in its architectural composition and historic role within the emerging Victorian suburb. Given the location of the works within the rear curtilage of 11–13, the intervening built form, and the already altered rear context (including modern additions), the proposal would not harm the significance of the Listed Buildings or the contribution made by its setting.

With regard to the undesignated Nos. 11–13, the works are confined to the rear of the plot and do not entail loss of historic fabric of the principal villas. The scheme maintains the clear hierarchy between the main houses and secondary structures and acknowledges the long-established pattern of rear-plot buildings on this stretch of Whiteladies Road.

Regarding the character and appearance of the Conservation Area, the revised design responds positively to the reasons in the previous refusal by adopting an appropriately modest scale and a coherent terraced arrangement, with materials and detailing that are sympathetic to the local vernacular. Replacing a bland, utilitarian car park and a poor-quality outbuilding with a well-designed, subordinate terrace would preserve and, in townscape terms, enhance this part of the Conservation Area.

On this basis, the proposal satisfies the statutory duties under Sections 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 - preserving the setting of the Listed Buildings and preserving and enhancing the character or appearance of the Conservation Area and accords with the NPPF tests for conserving and enhancing the historic environment.

2. OUTLINE

- 2.1. This heritage statement has been completed in respect of a proposal for the development of a terrace of four holiday lets on land to the rear of 11-13 Whiteladies Road, Bristol, centred on NGR 357841, 173532, and referred to hereafter as ‘the Site’. The Site, which for the purposes of this assessment includes all buildings within the red line boundary illustrated in Image 1-2, comprises an area of c. 0.14ha and lies on the east side of Whiteladies Road.

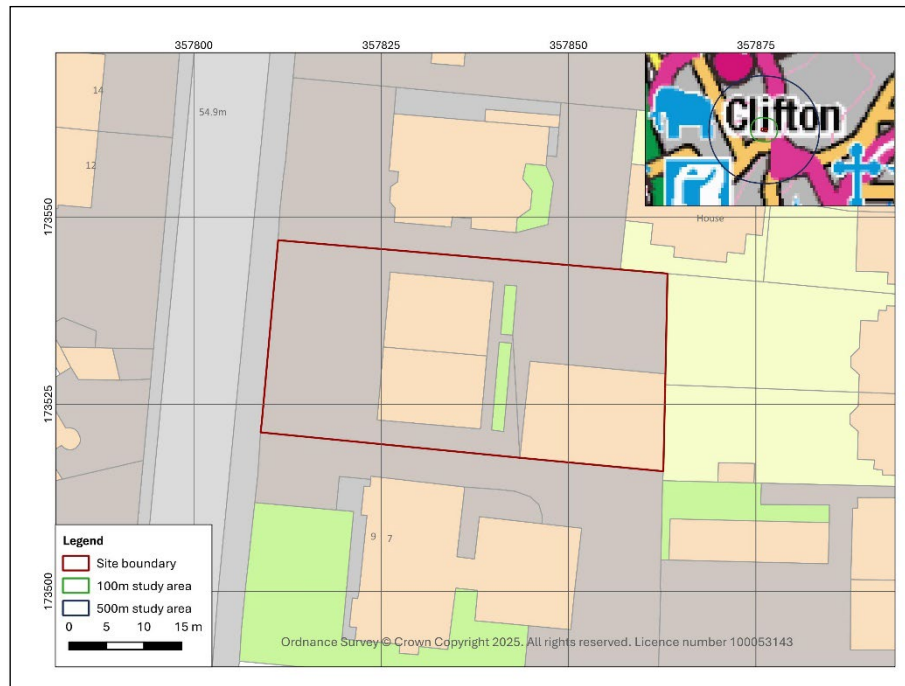


Image 1: Site location plan



Image 2: Aerial view of Site showing Listed Buildings

- 2.2. The Site lies in the Whiteladies Road Conservation Area and lies directly north of the Grade II Listed 7 and 9 Whiteladies Road (List Entry 1202690. No building within the Site is designated.
- 2.3. A planning application for the construction of four ‘mews style’ buildings was refused by Bristol City Council (Ref. s62A/2025/0111), with the *Statement of Reasons & Decision Notice* dated 08/08/2025. The reasons for refusal will be discussed later in this document.
- 2.4. The current proposal has sought to address the matters raised in the Decision Notice through a number of design iterations, and this heritage statement will assess the potential for adverse impacts on both the Whiteladies Road Conservation Area and the setting of the adjacent Grade II Listed 7 and 9 Whiteladies Road.

Limitations of data

- 2.5. Much of the data used in this assessment consists of secondary information derived from a variety of sources, only some of which have been directly examined for the purposes of this assessment. The assumption is made that this data, as well as that derived from other secondary sources, is reasonably accurate.

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Assessment Criteria

- 2.8. The criteria used in this assessment to define the level of harm resulting from any proposed development are set out in Table 1, below.

Table 1: Definition of harm

Magnitude of Impact	Defined as	Harm
Major Adverse	Total loss or major alteration of the assets or change in its setting, leading to the total loss or major reduction in the significance of the asset	Substantial Harm
Moderate Adverse	Partial Loss or alteration of the assets or change in its setting leading to the	Less Than Substantial Harm

	partial loss or reduction in the significance of the asset	
Minor Adverse	Slight change from pre-development conditions to the asset or change in its setting leading to the slight loss or reduction in the significance of the asset	Less Than Substantial Harm
Negligible	No change or very slight change to the asset or change in its setting resulting in no change or reduction in the significance of the asset	No Harm
Minor Beneficial	Slight improvement to the asset or change in its setting which slightly enhances the significance of the asset	No Harm
Moderate Beneficial	Moderate improvement to the asset or change in its setting which moderately enhances the significance of the asset	No Harm
Major Beneficial	Major improvement to the asset or change in its setting which substantially enhances the significance of the asset	No Harm

3. SITE ASSESSMENT

The Site and its setting

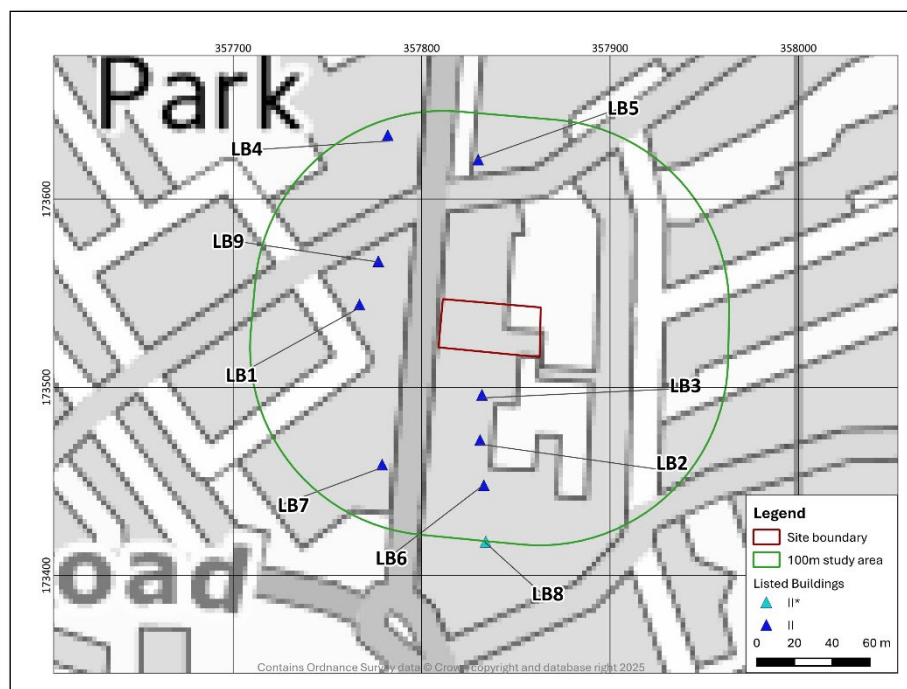


Image 3: Distribution of Listed Buildings in study area

- 3.1. An arbitrary 100m study area was established to better quantify and understand the distribution and type of designated heritage assets in proximity to the Site.

- 3.2. The study area includes 9 Listed Buildings (Image 3), all but one of which are Grade II Listed, with the Grade II* Listed *Royal West of England Academy* situated c. 100m south of the Site.

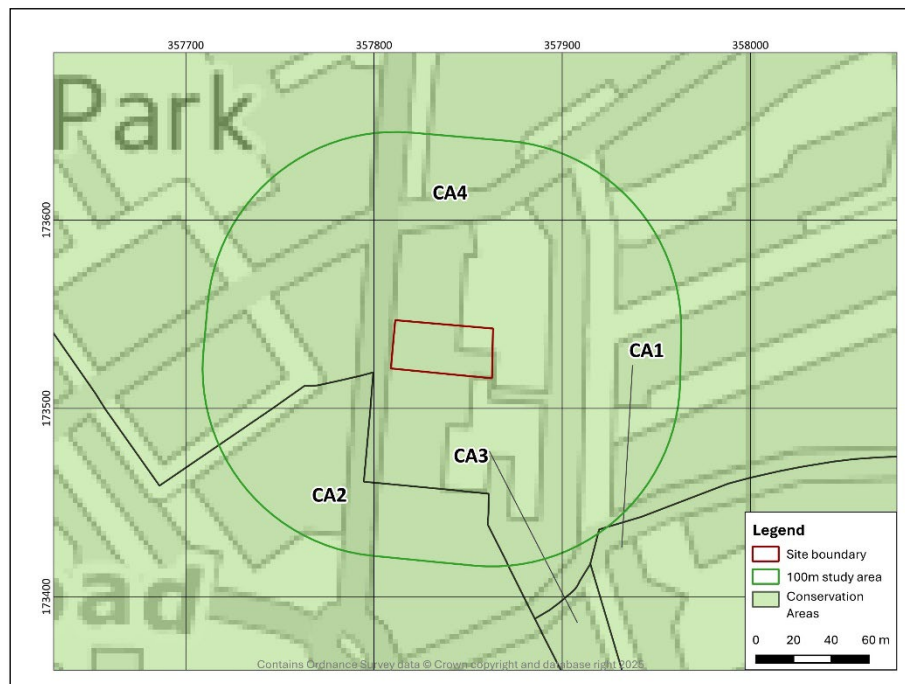


Image 4: Conservation Areas in study area

- 3.3. The area proposed for development lies to the rear of the two adjoining principal buildings at the Site, the undesignated Nos. 11 and 13 Whiteladies Road. The area includes hardstanding used for car parking and a substantial single storey annex of later build than the two main properties which date to the period 1855 and 1874 and were originally constructed as a pair of residential villas.

Site visit

- 3.4. A site visit was undertaken on 22nd August 2025 where the proposed development area was walked over and visually assessed. Visual and spatial relationships between the Site and nearby designated heritage assets were assessed and observations made at the time have informed the findings of this heritage statement. Given the date of the two principal buildings at the Site, the developmental history of the Site is illustrated below in the historic map regression section.

Historic map regression

- 3.5. The study of historic maps can help to identify the evolution of the settings of historic places, and aid in the identification of how they have changed through time. Historic map regression can also identify historic relationships, such as designed views or routeways, which may have become fossilised in the historic landscape, streetscape or possibly lost to development or boundary change.

1821 Donne's new and correct plan of Bristol, Clifton and the Hot Wells

- 3.6. Donne's map of 1821 illustrates the undeveloped Whiteladies Road area. What is today Whiteladies Road forms the central north-south thoroughfare in the map, with a building called *White Ladies* shown toward the north end of the road. The name comes from a

Carmelite nunnery (so-called because of the white habits the nuns wore), part of the Carmelite order. A small convent of these nuns was established in the area in the 13th century, probably around the area where today Whiteladies Road meets St John's Road.



Image 5: 1821 Donne's new and correct plan of Bristol, Clifton and the Hot Wells

1844 Clifton parish tithe map

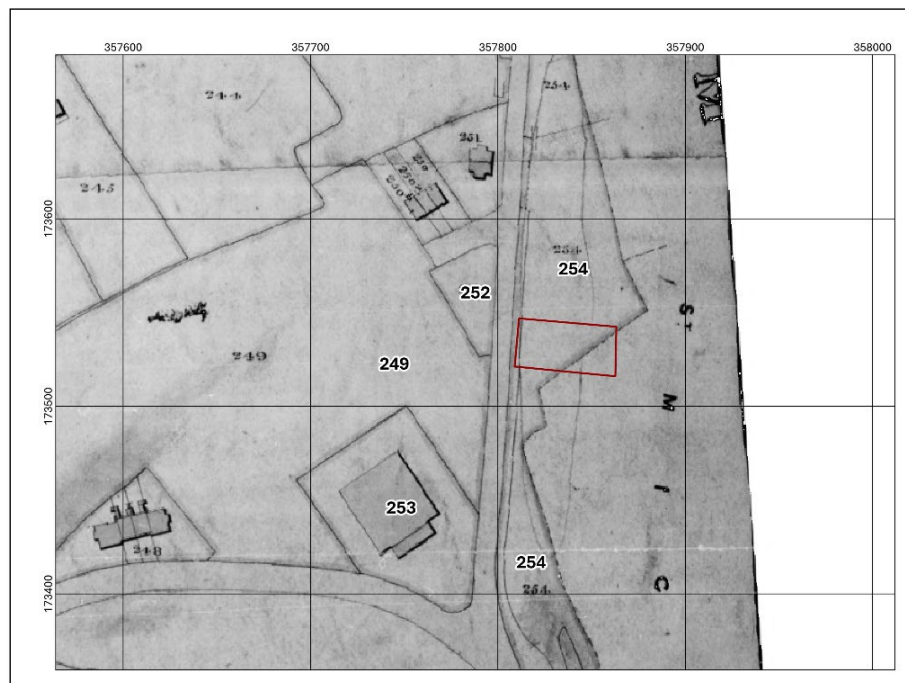


Image 6: 1844 Clifton parish tithe map

- 3.7. The tithe map for Clifton was completed in 1844 by an J. Marmont, Bristol, with the apportionment compiled in 1842 (Kain & Oliver 1995). The Site lies largely in Plot 254 with Whiteladies Road still mostly undeveloped. This, along with several adjacent and nearby

plots, are included in Table 2 below to provide further information on local land use and ownership.

Table 2: 1842 Clifton tithe map apportionment

Plot No.	Plot Name	Landowner	Land Use	Interpretation
254	Lodge and part of The Park	Thomas Onesiphorous Tyndall	Plantation and Pasture	Self-explanatory
252	Land being built upon	Francis Augustus Barnett	Pasture	Self-explanatory
249	Part of the Eight Acres	Francis Adams	Pasture	Size of now sub-divided field
253	The Victoria Rooms, Lawn and- Yard	Abraham Gray Harford Battersly; Charles Ludow Walker (As Trustees of The Victoria Rooms)	-	Self-explanatory

- 3.8. The apportionment document records a Lodge on the plot, although no building is illustrated. The landowner, Thomas Onesiphorous Tyndall, was a member of the Bristol based Tyndall family associated with Royal Fort House and the surrounding Tyndall's Park estate (now much of the University of Bristol/St. Michael's Hill area). In the 1850s the family began selling off significant portions of the park for development, probably eventually including the Site.

1881 Ordnance Survey County Series 1:2,500

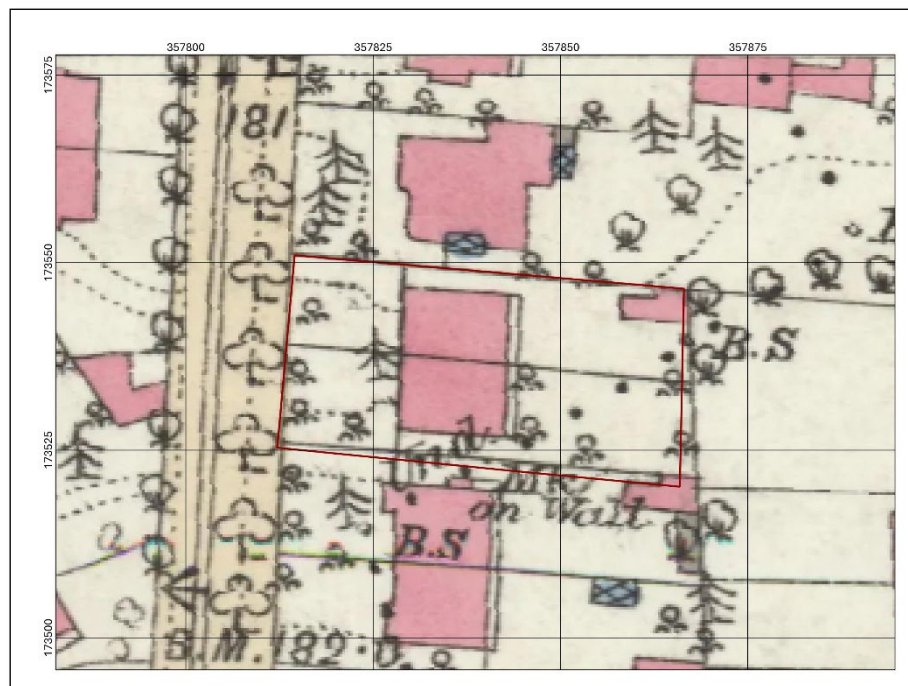


Image 7: 1881 Ordnance Survey County Series 1:2,500

- 3.9. The 1881 OS map shows the two principal buildings at the Site have been completed, along with associated gardens to the front and rear.
- 3.10. A similar arrangement of buildings lies to the south and interestingly, whilst both sites comprise two adjoining buildings, the northern of the two includes a building in the northeast corner of the rear garden area. The function of these buildings is unknown; however, they are uniform in shape and clearly form part of the original design.

1901 Ordnance Survey County Series 1: 2,500

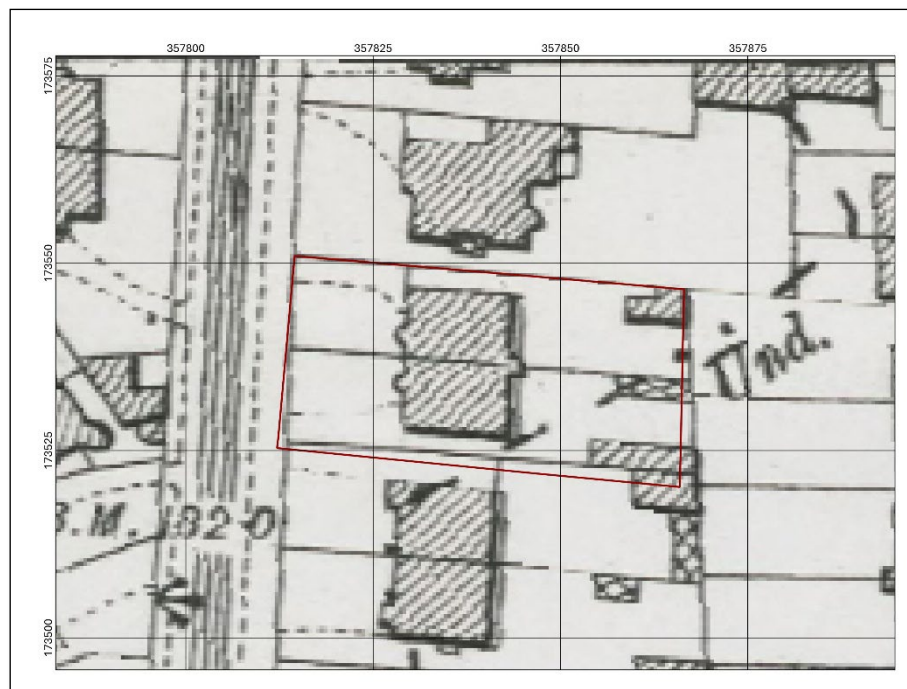


Image 8: 1901 Ordnance Survey County Series 1: 2,500

- 3.11. This turn of the 20th century OS map shows additional development to the rear of both properties. The northern of the two includes a small square structure against the east boundary, whilst the southern now includes a glasshouse against the northern garden boundary, and a separate longer outbuilding against the southern boundary. Again, the function of these buildings is unknown.
- 3.12. This edition appears to show previously unillustrated bay windows to the frontage.

1913 Ordnance Survey County Series 1:2,500

- 3.13. By 1913 there is no change significant within the Site boundary, although the small square building to the rear is no longer illustrated.



Image 9: 1913 Ordnance Survey County Series 1:2,500

1938 Ordnance Survey County Series 1:10,560



Image 10: 1938 Ordnance Survey County Series 1:10,560

- 3.14. By the later 1930s the Site continues to remain unchanged since the issue of the previous map.

1955 Ordnance Survey Plan 1:10,560

- 3.15. By the mid-1950s the buildings to the rear of the properties shown in earlier maps have been removed. The building illustrated in the southeast of the Site has replaced the

earlier long rectangular structure on a larger footprint which extends outside the modern Site boundary.

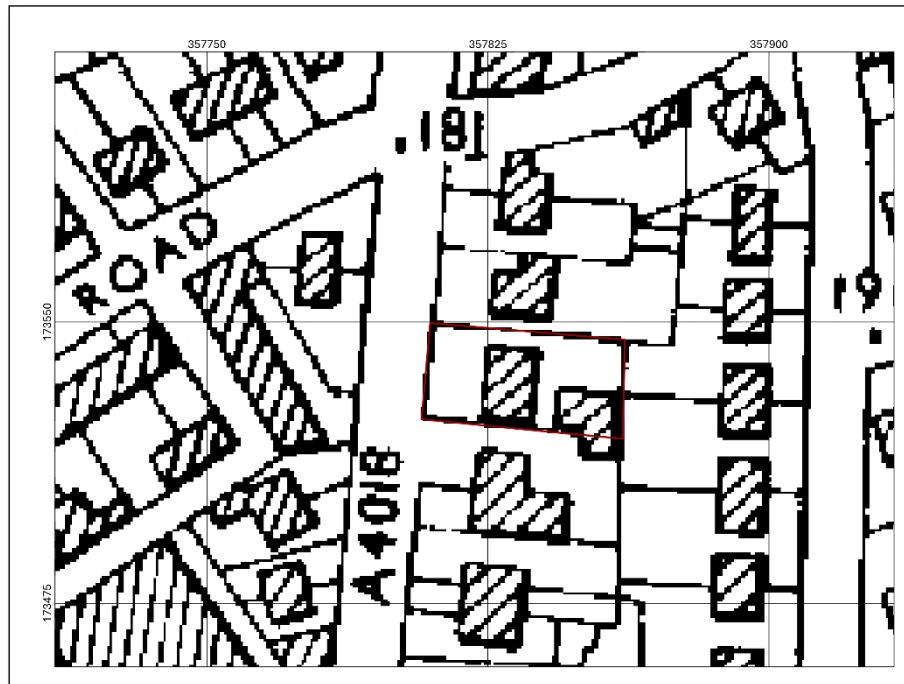


Image 11: 1955 Ordnance Survey Plan 1:10,560

1980-89 Ordnance Survey Plan 1:1,250

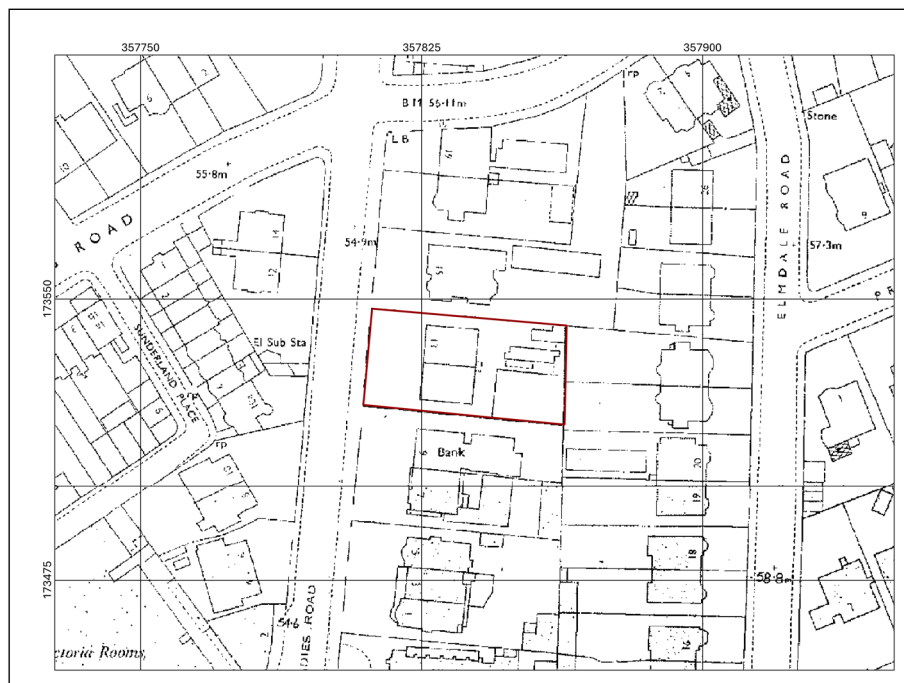


Image 12: 1980-89 Ordnance Survey Plan 1:1,250

- 3.16. By the 1980s, the rear of the buildings has been subject to further redevelopment. A large building occupies the southeast corner on a different footprint to that illustrated previously, and likely to represent that extant at the Site today. Three further structures

lie to its north of varying sizes. Again, no functionality is noted in the map for any of the buildings.

Satellite imagery

- 3.17. The modern Google Earth sequence covers the period 1999 to 2025. The 1999 image shows an unchanged Site from that shown in the 1980s OS map, with the area north of this building under hard standing and in use as a car park. Nothing further of note was found in the image sequence.

4. ASSESSMENT OF SIGNIFICANCE

Scoping

- 4.1. Initial desk based studies, and the subsequent site visit, identified a single Listed Building to the south of the Site whose setting was considered to be at risk of harm as a result of the proposed development. The setting and significance of this building, Listed as *7 and 9 Whiteladies Road*, is assessed in detail below.
- 4.2. The two historic buildings at the Site are of historic interest and are also assessed in detail below, along with the character and appearance of the Whiteladies Road Conservation Area.

7 and 9 Whiteladies Road (Grade II Listed Building; List Entry 1202690)

Description

- 4.3. The Listed Building comprises a pair of adjoining properties of mid-19th century construction, broadly contemporary with those at the Site (Image 13).



Image 13: 7 and 9 Whiteladies Road, front elevation

- 4.4. The two storey building is of a symmetrical design with a three storey tower at either end, built of limestone ashlar under a hipped slate roof.

- 4.5. The interior is noted as having been largely remodelled in the 20th century, and at the time of the site visit the property was vacant and offered to let as office space.

Contributors to the significance of the Listed Building

- 4.6. Archaeological and evidential value: The Listed Building will derive significance from its historic fabrics, the earliest of which date to the mid-19th century. The archaeological and evidential value of the building is considered to contribute to its overall significance at a moderate level.
- 4.7. Historical value: Illustrative historical value will contribute to the overall significance of the Listed Building, which forms an important element of the Georgian to early Victorian built form of Whiteladies Road, formerly a largely undeveloped turnpike road out of Bristol towards the Clifton Downs and on to Gloucester.
- 4.8. Development in this area was rather piecemeal, although Nos. 7 and 9, and 11 and 13 (the Site) appear broadly contemporary.
- 4.9. The historical value of the Listed Building is considered a major contributor to its heritage significance.
- 4.10. Architectural and aesthetic value: The Listed Building has been constructed in an Italianate style, with the two towers flanking the frontage creating a noteworthy and attractive addition to the streetscene.
- 4.11. The List Entry notes a number of important architectural features incorporated into the exterior of the building. It also notes that the interior has been subject to significant internal alteration. During the site visit a large modern extension was noted to the rear.
- 4.12. It is assessed that the property's architectural and aesthetic values represent a major contribution to its significance.
- 4.13. Communal value: The building is in private ownership and not generally accessible to the public. It is currently vacant and negligible communal value is assessed.
- 4.14. Setting: The Listed Building's setting comprises the built form of the south of Whiteladies Road and consists of a group of largely early Victorian villas now largely in use as office space. The building is set back from the road with lawn and car parking to its frontage.
- 4.15. This setting is assessed to represent a major contributor to its overall heritage significance both in terms of the local built form, and in its position on Whiteladies Road where it represents a significant building of notable design.
- 4.16. Overall: Nos. 7 and 9 Whiteladies Road is considered a building of special interest, whose significance is derived largely from its historical value and architectural/aesthetic qualities, along with an important contribution from its roadside setting i.

11-13 Whiteladies Road (Undesignated)

Description

- 4.17. The adjoining buildings comprising 11-13 Whiteladies Road are undesignated, possibly due to the degree to which they have been altered internally in their 20th century conversion to offices.

- 4.18. The mid-Victorian building comprises a property of three storeys, stuccoed and painted, built between c. 1855 and 1874 (Image 14).
- 4.19. A single storey outbuilding occupying a fairly large footprint lies to the rear of No. 11, first shown in historic maps after 1980 (Image 12).



Image 14: 11 and 13 Whiteladies Road, front elevation

- 4.20. The building is set back from Whiteladies Road with car parking to the front and rear.

Contributors to the significance of the building

- 4.21. Archaeological and evidential value: The property will derive significance from its historic fabrics, the earliest of which date to the mid-19th century. The archaeological and evidential value of the building is considered a moderate contributor to its significance.
- 4.22. Historical value: Illustrative historical value will contribute to the overall significance of the historic building, which formed part of the historical expansion of Bristol into the Clifton area, largely during the 19th century. Its historical value is considered a major contributor to its significance.
- 4.23. Architectural and aesthetic value: Architecturally, the building's design is consistent with many of the terraces and semi-detached/villa style residences built in Clifton and around Whiteladies Road in the mid-19th century, comprising multiple storeys, basements, rear service/annexe spaces, and decorative frontages. Alterations recorded from 1934 suggest that by the early 20th century there were modifications undertaken to the interior or façade which may have changed uses or internal layouts. It is assessed that the property's architectural and aesthetic values represent a major contribution to its significance.
- 4.24. Communal value: The property lies off Whiteladies Road and is currently vacant, offering no communal value.
- 4.25. Setting: The building's setting comprises the built form of Whiteladies Road, including a group of largely early Victorian villas now mostly in use as office space. The building is set back from the road with car parking to its front and rear. Its setting is assessed to

represent a moderate to major contributor to its overall significance. The setting is considered to have been detracted from by the raised car park and modernised outbuilding to the rear.

- 4.26. **Overall:** Nos. 11-13 Whiteladies Road is considered a building of local interest, whose significance is derived largely from its historical value and architectural/aesthetic values.

Whiteladies Road Conservation Area

Character and appearance

- 4.27. The Conservation Area is one of a number which cover this part of Bristol. The area features an irregular gridded street pattern centred around Whiteladies Road, today a key shopping and commuter route. The buildings are primarily residential, including substantial villas and terraces, often set back behind gardens. It is noted that a number on Whiteladies Road itself have been converted for office use.
- 4.28. A loose uniformity of architectural design is achieved through the predominant use of local materials such as Bathstone and Brandon Hill rubble, complemented by mature trees and well-constructed boundary walls. Whiteladies Road exhibits a mix of grand villa-type buildings and small-town shopping district style frontages, with some areas noted in the Conservation Area Statement as having experienced a loss of greenery due to development (BCC 2015).

Contribution of the Site to the Conservation Area's character and appearance

- 4.29. The front of the Site occupies a prominent position on Whiteladies Road, with a broad access offering views of the principal buildings. The architecture built form of Nos. 11-13 reflects an early Victorian conceptual villa design repeated around this part of the city, although the villa designs tend toward individuality. The principal building is considered a positive contributor to the character and appearance of the Conservation Area, although hardstanding used for car parking between it and the street offers a minor degree of negative impact.
- 4.30. The rear of the Site comprises a raised area of car park which includes a modern outbuilding and is generally considered detrimental to the character of the Conservation Area in its current condition.

5. ASSESSMENT OF IMPACT

Planning proposal

- 5.1. The proposed development comprises the construction of a terrace of four cottages to be used as holiday lets. Detailed plans and elevations are included in Appendix 2 of this heritage statement.

Planning matters

- 5.2. A previous application for the 'Demolition of the rear annexe and delivery of 4 mews houses for short-term let with associated landscaping and other works' was refused planning consent (Ref: s62A/2025/0111).

- 5.3. A number of heritage related reasons led to the refusal, related largely to a perceived negative effect on the character and appearance of the Conservation Area. The full text of the Refusal Notice is presented in Appendix 4.
- 5.4. A new planning application is to be submitted with a revised design for the buildings, taking into account a number of comments set out in the refusal notice (Appendix 2).

Setting of Nos. 7 and 9 Whiteladies Road

- 5.5. It is considered, given the comments in the Refusal Notice and the recent site visit, that the setting of the adjacent Listed Building is unlikely to be adversely affected by the proposal. The rear currently includes a large modern extension and development adjacent to this is not found to have the capacity to result in harm to the significance of the Listed Building, which is derived from its architectural and historical qualities, and those parts of its setting which relate to its historical positioning in the emerging suburb of Clifton.

Nos. 11 and 13 Whiteladies Road

- 5.6. The rear of the undesignated 11 and 13 Whiteladies Road includes modern car parking and the 1980s outbuilding, which has been subject to more recent modernisation (Image 16).
- 5.7. Effects of the proposed development on this, whilst resulting in visual change, will not change or remove any features relevant or important to the understanding or appreciation of the extant historic buildings.

Character and appearance of Whiteladies Road Conservation Area

- 5.8. Currently the rear of 11-13 Whiteladies Road includes a car park (Image 15) and outbuilding. The outbuilding is of 1980s origin (or possibly a little earlier) and has been in use as small business office space (Image 16).
- 5.9. The proposal seeks to replace the late 20th century outbuilding with a terrace of four cottages. It is noted that the Refusal Notice states “The Applicant has described the four proposed dwellings as ‘mews houses’. Whilst they would face onto a small garden ‘courtyard’ area, they are not the typical form or design of mews buildings. For example, there is little indication that the annexe sought to be demolished is a converted historic stables or coach house located to the rear of grander residences. As such, the use of mews as a built form in this location appears to be the exception rather than a prevailing characteristic”. Historic map regression has found that the original design included a rear building of unestablished use, which might well have represented a stable or similar – Nos. 7 and 9 featured a building on an identical footprint at this time suggesting a continuity of practical use. Whilst this does not represent any part of the existing outbuilding, the principle of buildings to the rear in uses differing from that of the main buildings was established very early in the building’s history, probably at its conception.
- 5.10. It is noted that the building to the north features a significant modern building to its rear (Image 15, left) which includes design and a materials palette at odds with the wider vernacular, as indeed is the large extension to the rear of the adjacent Listed Building (Image 17). Whilst this is by no means considered to offer any president for the proposed development, it serves to illustrate that development to the rear of these properties does not fundamentally affect the character and appearance of the Conservation Area.



Image 15: Car park behind 11 and 13 Whiteladies Road



Image 16: Outbuilding behind 11 and 13 Whiteladies Road

- 5.11. The revised development addresses a number of the design concerns raised in the Refusal Notice, however this heritage statement has found that the fundamental principle of development to the rear of this group of historic villas (for whatever final use, be it residential, holiday let or additional office space) should be acceptable in planning terms since it does not appear to adversely affect or impact on the character or appearance of the area.
- 5.12. In the case of the Site, the rear of the extant building offers no positive contribution to the character of the Conservation Area, and it is considered that the proposal will offer a number of aesthetic improvements to the existing bland utilitarianism of the car park and outbuilding.



Image 17: Extension to rear of 7 and 9 Whiteladies Road

6. CONCLUSION

- 6.1. The planning proposal would replace a low-quality late-20th century outbuilding and car park at the rear of 11–13 Whiteladies Road with a modest terrace of four holiday let cottages. This assessment has found that the special interest of the Whiteladies Road Conservation Area is derived principally from its 19th century townscape along the arterial frontage and the historic pattern of ancillary activity to the rear. The existing rear yard makes no positive contribution to that character or significance.
- 6.2. In relation to the adjacent Grade II Nos. 7–9 Whiteladies Road, the Listed Building's significance lies in its architectural composition and historic role within the emerging Victorian suburb. Given the location of the works within the rear curtilage of 11–13, the intervening built form, and the already altered rear context (including modern additions), the proposal would not harm the significance of the Listed Buildings or the contribution made by its setting.
- 6.3. With regard to the undesignated Nos. 11–13, the works are confined to the rear of the plot and do not entail loss of historic fabric of the principal villas. The scheme maintains the clear hierarchy between the main houses and secondary structures and acknowledges the long-established pattern of rear-plot buildings on this stretch of Whiteladies Road.
- 6.4. Regarding the character and appearance of the Conservation Area, the revised design responds positively to the reasons in the previous refusal by adopting an appropriately modest scale and a coherent terraced arrangement, with materials and detailing that are sympathetic to the local vernacular. Replacing a bland, utilitarian car park and a poor-quality outbuilding with a well-designed, subordinate terrace would preserve and, in townscape terms, enhance this part of the Conservation Area.
- 6.5. On that basis, the proposal satisfies the statutory duties under Sections 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 - preserving the setting of the Listed Buildings and preserving and enhancing the character or appearance

of the Conservation Area and accords with the NPPF tests for conserving and enhancing the historic environment.

- 6.6. This assessment follows national and local planning policy and guidance set out in the 2025 issue of the NPPF, the Bristol Development Framework Core Strategy - Adopted June 2011, and guidance notes issued by Historic England and the ClfA.

7. SOURCES AND REFERENCES

Written sources

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Other Sources

British History Online

Historicengland.org

National Heritage List for England

Oldmapsonline.org

Wiki Commons

Appendix 1: Gazetteer of heritage assets

FIG. REF.	REF.	NAME	TYPE	PERIOD	SUMMARY	STATUS	EAST	NORTH
Designated Sites and Monuments (Historic England data:100m study area)								
Listed Buildings (100m study area)								
LB1	1202608	1-4, Sunderland Place	Terrace	Post-medieval	Terrace of 4 houses. c1850. By Thomas Pennington.	II	357767	173544
LB2	1202689	1,3 And 5, Whiteladies Road	Houses	Post-medieval	3 attached houses, now offices. 1858. By George Gay.	II	357831	173472
LB3	1202690	7 And 9, Whiteladies Road	Houses	Post-medieval	Pair of attached houses, now offices. Mid C19.	II	357832	173496
LB4	1202691	16 And 18, Whiteladies Road	Houses	Post-medieval	Pair of attached houses, now offices. c1850	II	357782	173634
LB5	1202692	Broadcasting House	Houses	Post-medieval	Pair of attached houses, now office. 1852. Built by JC Lee	II	357830	173621
LB6	1202701	Victoria Chapel	House	Post-medieval	Methodist chapel. 1863. By Foster and Wood	II	357833	173448
LB7	1219998	Royal Colonial Institute	Office	Post-medieval	Office. Late C19, refaced 1921.	II	357779	173459
LB8	1282156	Royal West Of England Academy	Gallery	Post-medieval	Art gallery. 1857. Interiors by C Underwood. Facade by JR Hirst.	II*	357834	173418
LB9	1291175	Commonwealth House	House	Post-medieval	Attached pair of houses, now offices. c1850.	II	357777	173567
Conservation Areas (100m study area)								
CA1	n/a	Tyndall's Park	CA	Post-medieval	Historic core	n/a	358240	173333
CA2	n/a	Clifton	CA	Post-medieval	Historic core	n/a	357157	173279

CA3	n/a	Park Street and Brandon Hill	CA	Post-medieval	Historic core	n/a	357997	172967
CA4	n/a	Whiteladies Road	CA	Post-medieval	Historic core	n/a	357655	174152

Appendix 2: Proposal drawings

Appendix 3: Planning policy and guidance

Introduction

This assessment has been written within the following legislative, planning policy and guidance context:

- National Heritage Act 1983 (amended 2002);
- Town and Country Planning Act (1990);
- Planning (Listed Buildings and Conservation Areas) Act (1990);
- National Planning Policy Framework (2025);
- Bristol Development Framework Core Strategy - Adopted June 2011;
- Planning Practice Guidance, Historic Environment (2025);
- Historic Environment Good Practice Advice in Planning: Note 2 - Managing Significance in Decision-taking in the Historic Environment (Historic England 2015)
- Historic Environment Good Practice Advice in Planning: Note 3 - The Setting of Heritage Assets (Historic England 2015);
- Conservation Principles: policies and guidance for the sustainable management of the historic environment (English Heritage 2008).

Planning (Listed Buildings and Conservation Areas) Act (1990)

66 General duty as respects listed buildings in exercise of planning functions

(1) In considering whether to grant planning permission [F1 or permission in principle] for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

(2) Without prejudice to section 72, in the exercise of the powers of appropriation, disposal and development (including redevelopment) conferred by the provisions of sections 232, 233 and 235(1) of the principal Act, a local authority shall have regard to the desirability of preserving features of special architectural or historic interest, and in particular, listed buildings.

(3) The reference in subsection (2) to a local authority includes a reference to a joint planning board F

(4) Nothing in this section applies in relation to neighbourhood development orders.

72 General duty as respects conservation areas in exercise of planning functions

(1) In the exercise, with respect to any buildings or other land in a conservation area, of any [F1 functions under or by virtue of] any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

(2) The provisions referred to in subsection (1) are the planning Acts and Part I of the Historic Buildings and Ancient Monuments Act 1953 [F2 and sections 70 and 73 of the Leasehold Reform, Housing and Urban Development Act 1993].

(3) In subsection (2), references to provisions of the Leasehold Reform, Housing and Urban Development Act 1993 include references to those provisions as they have effect by virtue of section 118(1) of the Housing Act 1996.

(4) Nothing in this section applies in relation to neighbourhood development orders.

National Planning Policy Framework (NPPF; February 2025)

16. Conserving and enhancing the historic environment

202. Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

203. Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

- d) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
- e) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- f) the desirability of new development making a positive contribution to local character and distinctiveness; and
- g) opportunities to draw on the contribution made by the historic environment to the character of a place.

204. When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.

205. Local planning authorities should maintain or have access to a historic environment record. This should contain up-to-date evidence about the historic environment in their area and be used to:

- a) assess the significance of heritage assets and the contribution they make to their environment; and
- b) predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future.

206. Local planning authorities should make information about the historic environment, gathered as part of policy-making or development management, publicly accessible.

Proposals affecting heritage assets

207. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

208. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting

of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

209. Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.

210. In determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c) the desirability of new development making a positive contribution to local character and distinctiveness.

211. In considering any applications to remove or alter a historic statue, plaque, memorial or monument (whether listed or not), local planning authorities should have regard to the importance of their retention in situ and, where appropriate, of explaining their historic and social context rather than removal.

Considering potential impacts

212. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

213. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
- b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.

214. Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a) the nature of the heritage asset prevents all reasonable uses of the site; and
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
- d) the harm or loss is outweighed by the benefit of bringing the site back into use.

215. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

216. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

217. Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.

218. Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

219. Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

220. Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 214 or less than substantial harm under paragraph 215, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.

221. Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.

Planning Policy Guidance (PPG)

Setting

On ‘setting’, the PPG sets out (para. 013 Reference ID: 18a-013-20190723) that “All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not. The setting of a heritage asset and the asset’s curtilage may not have the same extent”.

It continues “The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each. The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights of way or an ability to otherwise access or experience that setting. The contribution may vary over time”.

Harm

The PPG sets out further information on the degrees of harm which might result from development affecting a heritage asset (para. 018 Reference ID: 18a-018-20190723). It states “Where potential harm to designated heritage assets is identified, it needs to be categorised as either less than substantial harm or substantial harm (which includes total loss) in order to identify which policies in the National Planning Policy Framework (paragraphs 194-196) apply. Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated”.

It continues “Whether a proposal causes substantial harm will be a judgment for the decision-maker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset’s significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting. While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all, for example, when removing later additions to historic buildings where those additions are inappropriate and harm the buildings’ significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm, depending on the nature of their impact on the asset and its setting”.

A further section addresses the concept of harm in a Conservation Area situation (para. 019 Reference ID: 18a-019-20190723). It states that “Paragraph 201 of the National Planning Policy Framework is the starting point. An unlisted building that makes a positive contribution to a conservation area is individually of lesser importance than a listed building. If the building is important or integral to the character or appearance of the conservation area then its proposed demolition is more likely to amount to substantial harm to the conservation area, engaging the tests in paragraph 195 of the National Planning Policy Framework. Loss of a building within a conservation area may alternatively amount to less than substantial harm under paragraph 196. However, the justification for a building’s proposed demolition will still need to be proportionate to its relative significance and its contribution to the significance of the conservation area as a whole. The same principles apply in respect of other elements which make a positive contribution to the significance of the conservation area, such as open spaces”.

Public benefit

An important aspect of the assessment of harm is the identification of public benefit to a proposal which would offset the harm identified. The PPG states (Para 020 Reference ID: 18a-020-20190723) “Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit”.

Examples of heritage benefits may include:

- sustaining or enhancing the significance of a heritage asset and the contribution of its setting;
- reducing or removing risks to a heritage asset; or

- securing the optimum viable use of a heritage asset in support of its long-term conservation.

Local planning policy: Bristol Development Framework Core Strategy - Adopted June 2011

Policy BCS22

Development proposals will safeguard or enhance heritage assets and the character and setting of areas of acknowledged importance including:

- Scheduled ancient monuments;
- Historic buildings both nationally and locally listed;
- Conservation areas;
- Historic parks and gardens both nationally and locally listed;
- Archaeological remains.

Guidance

This assessment has been conducted with reference to guidance documents produced by Historic England since 2008, and, where appropriate, in accordance with the Chartered Institute for Archaeologists' Standards and Guidance for Historic Environment Desk-Based Assessment (CIfA 2014), as set out below.

Historic Environment Good Practice Advice in Planning: Note 2 - Managing Significance in Decision-taking in the Historic Environment

The GPA note advises a 6-stage approach to the identification of the significance of a heritage asset and the potential effects on its significance resulting from any development.

The significance of a heritage asset is the sum of its archaeological, architectural, historic, and artistic interest. A variety of terms are used in designation criteria (for example outstanding universal value for world heritage sites, national importance for Scheduled Monuments and special interest for Listed Buildings and Conservation Areas), but all of these refer to a heritage asset's significance.

The list of Steps is set out below, however the GPA does add "...it is good practice to check individual stages of this list, but they may not be appropriate in all cases and the level of detail applied should be proportionate. For example, where significance and/or impact are relatively low, as will be the case in many applications, only a few paragraphs of information might be needed, but if significance and impact are high then much more information may be necessary".

The recommended Steps are as follows:

1. Understand the significance of the affected assets;
2. Understand the impact of the proposal on that significance;
3. Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF;
4. Look for opportunities to better reveal or enhance significance;
5. Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change; and
6. Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

Regarding the application process, the GPA offers the following advice: "Understanding the nature of the significance is important to understanding the need for and best means of

conservation. For example, a modern building of high architectural interest will have quite different sensitivities from an archaeological site where the interest arises from the possibility of gaining new understanding of the past.

Understanding the extent of that significance is also important because this can, among other things, lead to a better understanding of how adaptable the asset may be and therefore improve viability and the prospects for long term conservation.

Understanding the level of significance is important as it provides the essential guide to how the policies should be applied. This is intrinsic to decision-taking where there is unavoidable conflict with other planning objectives”.

Regarding the assessment of the significance of a heritage asset, the GPA also states that the “...reason why society places a value on heritage assets beyond their mere utility has been explored at a more philosophical level by English Heritage in Conservation Principles (2008). Conservation Principles identifies four types of heritage value that an asset may hold: aesthetic, communal, historic and evidential value. This is simply another way of analysing its significance. Heritage values can help in deciding the most efficient and effective way of managing the heritage asset to sustain its overall value to society”.

For the purposes of this assessment and in line with Conservation Principles, the assessment of significance will include an assessment of a heritage asset’s communal value.

Historic Environment Good Practice Advice in Planning: Note 3 - The Setting of Heritage Assets

GPA note 3. expands on the six stages outlined in GPA Note 2, as set out above.

Step 1: identifying the heritage assets affected and their settings

The starting point of any assessment is the identification of those heritage assets likely to be affected by the proposed development. For this purpose, if the proposed development is seen to be capable of affecting the contribution of a heritage asset’s setting to its significance or the appreciation of its significance, it can be considered as falling within the asset’s setting.

Step 2: Assessing whether, how and to what degree these settings contribute to the significance of the heritage asset(s)

This Step provides a checklist of the potential attributes of a setting that it may be appropriate to consider defining its contribution to the asset’s heritage values and significance. Only a limited selection of the possible attributes listed below is likely to be important in terms of any single asset.

The asset’s physical surroundings

- Topography;
- Other heritage assets (including buildings, structures, landscapes, areas or archaeological remains);
- Definition, scale and ‘grain’ of surrounding streetscape, landscape and spaces;
- Formal design;
- Historic materials and surfaces;
- Land use;
- Green space, trees and vegetation;
- Openness, enclosure and boundaries;
- Functional relationships and communications;

- History and degree of change over time;
- Integrity; and
- Issues such as soil chemistry and hydrology.

Experience of the asset

- Surrounding landscape or townscape character;
- Views from, towards, through, across and including the asset;
- Visual dominance, prominence or role as focal point;
- Intentional intervisibility with other historic and natural features;
- Noise, vibration and other pollutants or nuisances;
- Tranquillity, remoteness, ‘wildness’;
- Sense of enclosure, seclusion, intimacy or privacy;
- Dynamism and activity;
- Accessibility, permeability and patterns of movement;
- Degree of interpretation or promotion to the public;
- The rarity of comparable survivals of setting;
- The asset’s associative attributes;
- Associative relationships between heritage assets;
- Cultural associations;
- Celebrated artistic representations; and
- Traditions.

Step 3: Assessing the effect of the proposed development on the significance of the asset(s)

The third stage of the analysis is to identify the range of effects that any Proposed Development may have on setting(s), and to evaluate the resultant degree of harm or benefit to the significance of the heritage asset(s).

The following checklist sets out the potential attributes of any proposed development which may affect setting, and thus its implications for the significance of the heritage asset. Only a limited selection of these is likely to be particularly important in terms of development.

Location and siting of development

- Proximity to asset;
- Extent;
- Position in relation to landform;
- Degree to which location will physically or visually isolate asset; and
- Position in relation to key views.

The form and appearance of the development

- Prominence, dominance, or conspicuousness;
 - Competition with or distraction from the asset;
 - Dimensions, scale and massing;
 - Proportions;
 - Visual permeability (extent to which it can be seen through);
 - Materials (texture, colour, reflectiveness, etc);
 - Architectural style or design;
 - Introduction of movement or activity; and
 - Diurnal or seasonal change.
-

Other effects of the development

- Change to built surroundings and spaces;
- Change to skyline;
- Noise, odour, vibration, dust, etc.;
- Lighting effects and ‘light spill’;
- Change to general character (e.g. suburbanising or industrialising);
- Changes to public access, use or amenity;
- Changes to land use, land cover, tree cover;
- Changes to archaeological context, soil chemistry, or hydrology; and
- Changes to communications/accessibility/permeability.

Permanence of the development

- Anticipated lifetime/temporariness;
- Recurrence; and
- Reversibility.

Longer term or consequential effects of the development

- Changes to ownership arrangements;
- Economic and social viability; and
- Communal use and social viability.

Step 4: Maximising enhancement and minimising harm

Enhancement may be achieved by actions including:

- removing or re-modelling an intrusive building or feature;
- replacement of a detrimental feature by a new and more harmonious one;
- restoring or revealing a lost historic feature or view;
- introducing a wholly new feature that adds to the public appreciation of the asset;
- introducing new views (including glimpses or better framed views) that add to the public experience of the asset; or
- improving public access to, or interpretation of, the asset including its setting

Options for reducing the harm arising from development may include the relocation of a development or its elements, changes to its design, the creation of effective long-term visual or acoustic screening, or management measures secured by planning conditions or legal agreements.

Step 5: Making and documenting the decision and monitoring outcomes

Step 5 identifies the desirability of making and documenting the decision-making process and monitoring outcomes.

For the purposes of this assessment Stages 1 to 3 have been followed, with Stage 4 forming, if/where appropriate, part of the recommendations.

Chartered Institute for Archaeologists: Standard and guidance for historic environment desk-based assessment (published December 2014; updated January 2017; updated October 2020)

This heritage statement has also been completed in line with guidance issued by the Chartered Institute for Archaeologists (CIfA). Armour Heritage is enrolled with the CIfA as a corporate entity and is recognised as a CIfA Registered Organisation.

This document has been completed in line with the CIfA Standard, as set out in the aforementioned document, which states: “Desk-based assessment will determine, as far as is

reasonably possible from existing records, the nature, extent and significance of the historic environment within a specified area. Desk-based assessment will be undertaken using appropriate methods and practices which satisfy the stated aims of the project, and which comply with the Code of conduct and other relevant regulations of ClfA. In a development context desk-based assessment will establish the impact of the proposed development on the significance of the historic environment (or will identify the need for further evaluation to do so) and will enable reasoned proposals and decisions to be made whether to mitigate, offset or accept without further intervention that impact”.

Appendix 4: Refusal Notice



Statement of Reasons & Decision Notice

Site visit made on 23 July 2025

by Mr [REDACTED] BA(Hons) PGCert MA FRGS MRTPI IHBC

an Inspector appointed by the Secretary of State

Decision date: 8 August 2025

Application Ref: s62A/2025/0111

Site Address: **11 to 13 Whiteladies Road, Clifton, Bristol BS8 1PB**

- The application was made under Section 62A of the Town and Country Planning Act 1990 (TCPA) by Urban Creation (11-13WLR) Ltd.
 - The site is located within the local planning authority area of Bristol City Council.
 - The application was dated 30 June 2025, with a valid date of 1 July 2025.
 - Consultation closed on 4 August 2025.
 - The development proposed is described as: '*Demolition of the rear annexe and delivery of 4 mews houses for short-term let with associated landscaping and other works.*'
-

Statement of Reasons

Summary of Decision

1. The application for planning permission is **REFUSED** for the reasons set out in this Statement of Reasons and Decision Notice.

Procedural Matters

2. The application was submitted under s62A of the *Town and Country Planning Act 1990*, as amended (TCPA). This allows for applications to be made directly to the Secretary of State (SoS), where a local authority has been designated. Bristol City Council (BCC) have been designated for non-major development since March 2024. The SoS has appointed a person under section 76D of the TCPA 1990 to determine the application instead of the SoS.
3. Following the closure of the representation period, Article 22 of *The Town and Country Planning (Section 62A Applications) (Procedure and Consequential Amendments) Order 2013* requires the SoS (or appointed person) to consider the application either by hearing or on the basis of representations in writing.
4. Taking into account Section 319A of the TCPA and the *Procedural guidance for Section 62A Authorities in Special Measures*¹ published by the SoS, as the appointed person I considered that the issues raised in this case should be dealt with by means of the Written Representations procedure.
5. The site is located within the Whiteladies Road Conservation Area. There are also several listed buildings in close proximity; including 7 & 9 Whiteladies Road to the south which are Grade II Listed Buildings (Historic England reference number 1202690).

¹ [Procedural guidance for Section 62A Authorities in Special Measures - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/procedural-guidance-for-section-62a-authorities-in-special-measures)

6. Therefore, the proposal requires consideration under the duties set out at s66(1) and s72(1) of the *Planning (Listed Buildings and Conservation Areas) Act 1990*, as amended (PLBCAA).

Recent planning history

7. The most recent planning permission is provided on page 7 of 22 of the Applicant's Planning Support Statement.² In the main, these applications principally relate to the main building on the site (which face Whiteladies Road), rather than the annexe building to the rear; for which planning permission is sought to demolish under this application and replace with four dwellings.

Planning Policy and guidance

8. The adopted development plan for this area comprises the *Site Allocations and Development Management Policies Local Plan (adopted July 2014)* (herein the LP) and the *Bristol Development Framework Core Strategy (adopted June 2011)* (herein the CS).
9. The *National Planning Policy Framework* (the Framework), and the associated national Planning Practice Guidance, are important material considerations.

Main Issues

10. The main issues are:

- i) Whether or not the proposal would preserve or enhance the character or appearance of the Whiteladies Road Conservation Area, and;
- ii) Whether or not the proposal would preserve the setting of nearby listed buildings.

Statutory Parties or Interested Persons

11. Any representations should have been made by 4 August 2025. Full details of the comments can be found on the application website at:
12. <https://www.gov.uk/guidance/section-62a-planning-application-s62a20250111-11-13-whiteladies-road-clifton-bristol-bs8-1pb>
13. A representation from the designated planning authority recommended refusal of planning permission on the basis of harm to the character and appearance of the conservation area. One representation was received from a local business, objecting to the proposal.
14. All written representations have been considered before making the decision here.

Reasons

Conservation Area

15. The proposed development comprises the demolition of the existing single storey annexe (Use Class E) and the construction of a two-storey terrace of four houses for short-term let (Use Class C1) with associated landscaping and

² https://assets.publishing.service.gov.uk/media/6865052b3b77477f9da0726c/11-13_WLR_Annexe_Full_App_Redacted.pdf

amenities. It is understood that the four units sought would form additional C1 accommodation for the currently proposed Class C1 development within the main building (Ref: 25/11594/F).

16. The Applicant has described the four proposed dwellings as 'mews houses'. Whilst they would face onto a small garden 'courtyard' area, they are not the typical form or design of mews buildings. For example, there is little indication that the annexe sought to be demolished is a converted historic stables or coach house located to the rear of grander residences. As such, the use of mews as a built form in this location appears to be the exception rather than a prevailing characteristic.
17. Indeed, 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 front onto an avenue of mature trees, have generous plot sizes, including large front garden areas; many of which are now used as parking areas. The buildings are characterised by attractive facades; many of which are finished with bath stone and painted timber sash windows. Nos 11-12 Whiteladies Road were built between 1855 and 1874 as a pair of residential villas.
18. The Conservation Area Enhancement Statement (undated) states that *'Whiteladies Road, the second area, conveys 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 more dense terraced element linking the two. It is also distinguished in parts by being lined with mature plane trees.'*
19. The significance of the conservation area derives from the architectural unity and the 'grand design' linking the town to the country, and the setting back of residential development from the plane tree lined highway. To the contrary, the proposal scheme would introduce two storey built form to the rear of the property, in what would have originally been its rear garden area. The proposed development would comprise dwellings which would not address a street frontage and would be perpendicular to the frontage buildings addressing the main road. This would be discordant with the overall urban grain of the conservation area and would therefore cause harm to its overall character and appearance.
20. Furthermore, the proposed dwellings would have a generic, low quality appearance and would have gable fronted pitched roofs. They would be constructed a two-tone brick façade, and a high-quality painted timber elevation is proposed the ground floor, which does not appear to reflect the prevailing building style or materials used within the conservation area.
21. Moreover, rather than gable-ended slate roofs, the predominant roof form in this part of the conservation area is hipped roofs set behind flat parapets and the predominant material palette is formed of bath stone, rubble stone and painted timber windows. The Whiteladies Road Conservation Area Enhancement Statement states; *'The domestic architecture styles have a consistency of design and materials contributing to the essential character of*

the conservation area. As such, the proposed design and materials would undermine the character of the conservation area and would detract from its generally unified appearance.

22. I accept that there are other existing buildings adjacent to the site which do not follow the established urban grain, overall scale and massing, roof form and material palette which is characteristic of the conservation area. However, these have caused harm to the character and appearance of the conservation area and its significance.
23. Moreover, the exacerbation of this harm through the introduction of further harm arising from the inappropriateness of the proposed style and materials does not provide justification for further harm to the conservation area. Furthermore, for the aforesaid reasons, the proposal would fail to make a positive contribution to local character and distinctiveness as sought by Paragraph 210 of the National Planning Policy Framework (the Framework).

Listed building

24. With regard to the nearby Grade II listed building at 7 and 9 Whiteladies Road and its setting, it is clear that this listed building sits within its own plot which is defined by low walls on many of its perimeter boundaries. Moreover, the way in which this building is experienced in terms of its architectural and historical special interest (which also contribute to its significance) would be unaffected by the proposal in this case. That is because whilst the proposed two storey building would be located close to the northern boundary, it would not compete visually with the listed building or those features which specifically contribute to its significance as a listed building.

Summary on main issues

25. The proposed development would fail to preserve or enhance the character and appearance of the Whiteladies Road Conservation Area. This is due to its ahistorical siting within the plot, its design including its two-storey form, and the materials proposed. Whilst this harm would be no greater than 'less than substantial' as set out in Paragraph 215 of the Framework (and, articulated further, towards the moderate part within that scale), considerable importance and weight should be given to the desire to preserve heritage assets.
26. Paragraph 215 also requires the decisionmaker to weigh the less than substantial harm against the public benefits of the proposal. The public benefits in this case have not been articulated clearly by the Applicant in their submission. However, public benefits here could include the provision of four dwellings under a C1 use class, in a centrally located location, with reasonably good transport links to services, shops and other facilities in Bristol city centre.
27. There are also benefits such as the creation of renewable energy from the proposed solar panels – although it is not clear as to whether this would be to a policy compliant amount (20%) as sought by Policy BCS14 as supported by Policy BCS15 both of the CS. It has also been suggested that the site could be landscaped, which would provide some visual benefits and potentially some limited biodiversity benefits.
28. However, I do not find that these public benefits, whether individually or cumulatively, outweigh the less than substantial harm to the designated heritage asset in the form of the Whiteladies Conservation Area. As such, the

proposal would be contrary to Policies BCS21, BCS22 of the CS and Policies DM26, DM27, DM30 and DM31 of the LP, which, amongst other aims, seek that development proposals should safeguard or enhance heritage assets and the character and setting of areas of acknowledged importance including conservation areas.

29. It would also conflict with policies of the Framework, which is an important material consideration; including those set out in Chapter 16: Conserving and enhancing the historic environment.

Other Matters

Fall back

30. My attention is drawn to a 'fall back' position set out within Paragraphs 5.13 to 5.19 of the Applicant's *Planning Statement*, June 2025. I have not been provided with the full details of that permission referenced 25/10493/COU. In any case, it does not provide justification for addressing or overcoming the harms I have identified arising from the scheme that is before me to consider.

Biodiversity Net Gain (BNG)

31. The Applicant has provided a BNG Exemption Statement. This confirms that the proposal will not impact more than 25m² of habitat, and is therefore considered to be exempt from BNG requirements and planning conditions under the de minimis rule of Section 4 of *The Biodiversity Net Gain Requirements (Exemptions) Regulations 2024*. At the same time, Policy BCS9 of the CS and Policy DM15 of the LP require that developments incorporate new and/or enhanced green infrastructure.
32. However, as the application is to be refused on the main issue identified, I have not considered this matter further.

Community Infrastructure Levy (CIL)

33. Bristol City Council consider that the proposed development is chargeable development under the *Community Infrastructure Levy (CIL) Regulations* (see email dated 1 July 2025). Based on the evidence before me I have no reason to conclude otherwise, and this is capable of being a material consideration as a local finance consideration.
34. Whilst I am satisfied that the necessary mitigation under CIL can be achieved in this case, given that the proposal is unacceptable and therefore to be refused, I have not considered this matter further.

Conditions

35. Bristol City Council suggested conditions to be imposed, were the decision-maker to grant permission. Whilst the decision is to refuse permission, for clarity, I do not consider that the suggested conditions would overcome or address the harms identified in this instance.

Planning balance and Conclusions

36. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.

37. In this case, I find that the proposal would conflict with Policies BCS21, BCS22 of the CS and Policies DM26, DM27, DM30 and DM31 of the LP. As such, I also find that it would not accord with the adopted development plan when considered as a whole. Moreover, there are not material considerations in this case which weigh in favour of the proposal that indicate a decision should be made otherwise than in accordance with the development plan.

38. As such, planning permission should be REFUSED, in this case.



INSPECTOR (appointed person for the purposes of s62A and s76D TCPA)

Decision Notice

Reference: s62A/2025/0111

Decision Date: 8 August 2025

The planning application for the demolition of the rear annexe and delivery of four mews houses for short-term let with associated landscaping and other works is **REFUSED**.

This is because the proposed development would fail to preserve or enhance the character and appearance of the Whiteladies Road Conservation Area, which is a designated heritage asset. This is due to its ahistorical siting within the plot, its incongruous design and two-storey form, and the materials proposed. As such, it fails to preserve or enhance the character or appearance of the conservation area as required by s72(1) of *The Planning (Listed Buildings & Conservation Areas) Act 1990*, as amended. Whilst this harm would be no greater than 'less than substantial' as set out in Paragraph 215 of the Framework (and articulated further towards the moderate part within that scale), considerable importance and weight should be given to the desire to preserve heritage assets. The proposed development has not been justified, nor can the harm be outweighed by public benefits cited in this case.

Accordingly, the proposal fails to comply with Policies BCS21 (Quality Urban Design) and BCS22 (Conservation and the Historic Environment) of the *Bristol Development Framework Core Strategy (adopted June 2011)* and Policies DM26 (Local Character and Distinctiveness), DM27 (Layout and Form), DM30 (Alterations to Existing Buildings) and DM31 (Heritage Assets) in the *Site Allocations and Development Management Policies Local Plan (adopted July 2014)*. It also conflicts with Section 16 of the *National Planning Policy Framework* and the *Whiteladies Road Conservation Area Enhancement Statement*.

***** END OF REFUSAL REASONS *****

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, no substantial problems arose which required the Planning Inspectorate, on behalf of the Secretary of State, to work with the applicant to seek any solutions.*
- 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. 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 promptly within 6 weeks of the date of the decision.*
- iii. *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>.*

***** END OF INFORMATIVES *****



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