

72-74 Gloucester Road, Bishopston, Bristol, BS7 8BF

Partial change of use to serviced apartments, demolition and extension

Planning Supporting Statement

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Project Ref. F062

Prepared on behalf of:

Honor Properties Ltd

1 Introduction

Purpose

- 1.1 This Planning Statement supports a Full Planning application submitted by Honor Properties Ltd with the following proposals: *'Partial change of use of Class E commercial unit to a Class C1 Apart-Hotel with 9no. serviced apartments, demolition of rear extension, replacement extension, external alterations and provision of refuse and cycle storage.'*
- 1.2 The purpose of the statement is to provide an overview of the proposals and to demonstrate compliance with relevant planning policy and guidance, along with other material considerations. It should be read in conjunction with the supporting documents and drawings listed on the application covering letter.

Structure of this Statement

- 1.3 This Statement is divided into the following sections:-
- Section 2.0: Site Description and Planning History
 - a description of the site and context along with a review of the site's planning history.
 - Section 3.0: Planning Policy Context
 - an explanation of the relevant national and local planning policy and guidance along with relevant material planning considerations for the proposed development.
 - Section 4.0: A Description of the Development Proposals
 - a description of proposals in terms of the use and physical development.
 - Section 5.0: Planning Considerations
 - an analysis of the scheme and compliance with national and local planning policies and ensures that relevant material considerations are addressed.
 - Section 6.0: Planning Balance and Conclusions
 - an overview of the merits of the development and reasoning why planning permission should be granted.

2 The Site Description and Planning History

Location and Context

- 2.1 The site is located within the Bishopston neighbourhood a short distance north of Bristol city centre and on what is a busy shopping street. The site is highly accessible for everyday needs with a wide range of local shops, support services, eating and drinking establishments, as well as leisure uses within easy walking distance.
- 2.2 The Bristol Local Centres Study report (2023) prepared for the Council describes the Gloucester Road town centre being:
- '...Gloucester Road town centre is a long, linear town centre located just to the north of the City Centre. The length of the town centre, and the variety in the retail offer, results in the centre functioning as a number of distinct centres in practice. The northern most part of the town centre is focused on serving day-to-day needs of the local community, and the southernmost part of Gloucester Road provides a particularly strong leisure service offer, which is likely to appeal to a fairly large catchment area.'* (para 6.41)
- 2.3 The location also benefits from excellent access to a mix of regular public transport services. There are several bus routes running available from stops on Gloucester Road that link the city centre to the northern suburbs.
- 2.4 Montpelier railway station is a less than 600m walk from where the Severn Beach line runs to Bristol Temple Meads Station with connections to the National Rail Network. The Bus Station off St James Barton roundabout in Bristol City Centre is also within a 15 minute walk.
- 2.5 Tier electric cycle and scooters are available for public hire and can be found within a short distance of the site.

72-74 Gloucester Road

- 2.6 The site is developed with an early 20th century building that is arranged over three floors and has been extended. The building occupies a conspicuous position within Gloucester Road, and to a degree, it is a local landmark.
- 2.7 Originally built for use as a bank, the use prevailed until the last occupiers the NatWest closed the branch in early 2022. The premises were vacant for more than a year and upon the applicant's purchase, a tenant now occupies part of the ground floor, but the majority of the building remains empty.
- 2.8 A more detailed description of the site can be found in the Heritage, Design & Access Statement.

Planning History

- 2.9 There is extensive planning history for the property dating back to the 1960s but the majority of planning submissions were for signage, lighting or installation of ATMs. Of these applications, in 1964 permission was granted to change the use of the upper floors from a bank residence to office accommodation (ref. 64/04910/U) and in 1966 permission was granted to extend the building, creating a strong room for the bank.

3 Planning Policy and Designations

3.1 This section sets out the relevant planning policy context. The starting point for the determination of this application is s Section 38(6) of the Planning and Compulsory Purchase Act 2004. This requires Local Planning Authorities to determine planning applications in accordance with the provisions of the Local Development Framework, unless material considerations indicate otherwise. The Development Plan documents adopted by the Local Planning Authority which are directly relevant to the application site comprises:

- Bristol Core Strategy (BCS), 2011; and
- Site Allocations & Development Management Policies (SADMP), 2014.

3.2 Supporting these policy documents are a number of supplementary planning documents and guidance published by the Council.

3.3 Based on the council's planning policy mapping, the site is located within the Gloucester Road Town Centre which is protected by adopted planning policies (BCS7, DM7 and DM9), within a Primary Shopping Area and the Gloucester Road Conservation Area (figure 1). It is also identified as being within an air quality management area.

3.4 A Conservation Area dates from 1981, and following the publication of a Character Appraisal in 2017, the area was extended to include the site. The Appraisal identifies the area as *Bristol North Baths environs*, and describes it as "the continuation of Gloucester Road curving beyond Meridian Terrace, defined by fine grain gable fronted terraces and book ended to the north by larger scale buildings including the Bristol North Baths." The application site is identified as a *character building* and thus is deemed to make a positive contribution to the area.

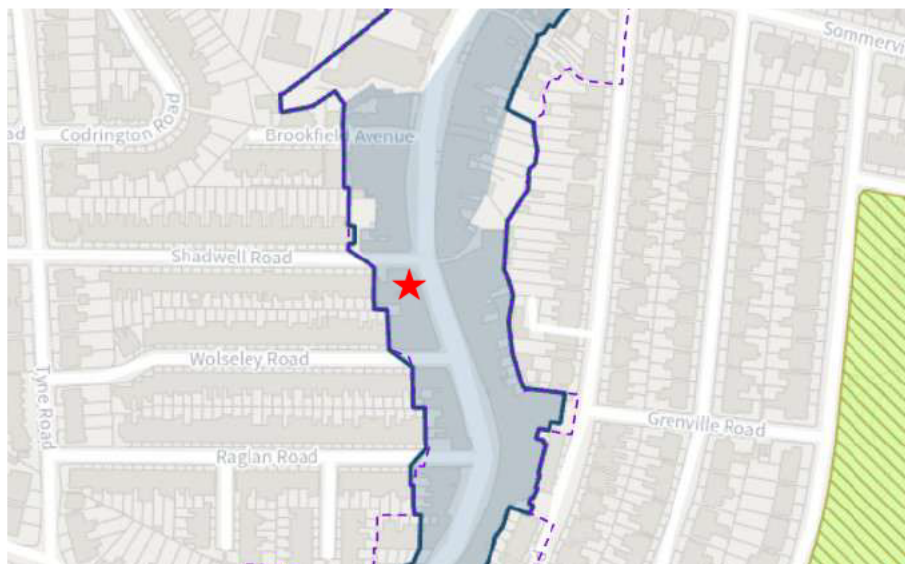


Figure 3. Extract from the Bristol's Planning Policy Map with the site highlighted with the red star. It is shown to be within the Gloucester Road Town Centre and within a Primary Shopping Area.

3.5 At the national level the National Planning Policy Framework (NPPF), 2024 and its accompanying Planning Practice Guidance are material considerations. The NPPF provides a presumption in favour of sustainable development and at Section 2 *Achieving sustainable development* paragraph 8

identifies the three over-arching objectives of the planning system that are interdependent, these being: economic; social; and environmental.

- 3.6 In pursuit of these objectives the NPPF guides development towards achieving sustainable solutions, but acknowledged that in doing so, decision '*... should take local circumstances into account, to reflect the character, needs and opportunities of each area.*' (paragraph 9)
- 3.7 The document then provides for a presumption in favour of sustainable development and establishes that development that accords with '*an up-to-date development plan*' should be approved without delay (para. 11, item c).
- 3.8 The NPPF places significant weight on the need to support economic growth through the planning system and the provision of new homes, particularly where this involves the efficient use of land, and in particular, previously developed land as in the case of the application site.
- 3.9 The Government's flood mapping identifies the site being within Flood Zone 1, thus has a low probability of flooding and a less than 0.1% chance of flooding from rivers or the sea in any year. Similar, the mapping shows there to be no surface water issues associated with the site.
- 3.10 The Coal Authority mapping does not identify the site being within a Development High Risk Area.

4 THE PROPOSED DEVELOPMENT

Proposed Use

- 4.1 The applicants are established owners and managers of serviced apartments and other residential accommodation in Bristol. They are looking to expand their business by creating an apart-hotel. They have purchased the property with the intention of bringing it back into full, beneficial use and their vision is to create, high-quality accommodation. They wish to retain a commercial unit on the ground floor (they have current tenants) but demolish the rear extension, build a new two-storey extension and within this and on the upper floors create an apart-hotel with 9no. serviced apartments (Use Class C1: hotel category).
- 4.2 The commercial unit will continue to be accessed from Gloucester Road and the guests staying in the apartments will use a new entrance within the extension off Shadwell Road.
- 4.3 In terms of apart-hotel use, as short-stay accommodation guests occupying the apartments will be limited to minimum stays of 5 days and a maximum stay of 180 days. Guests will be provided with fully furnished accommodation, kitchen equipment, china, glass ware and cutlery. Bed linen and towels will also be provided with it changed twice a week. Cleaning and general housekeeping will also be undertaken at this time. The apartments will benefit from television and internet services.
- 4.4 For those wishing to use a bike, a secure cycle store is provided with easy access.
- 4.5 A large refuse store will also be created and used by staff who clean the rooms. Collections will be by a commercial contractor.
- 4.6 The development will be actively managed by the applicants who will arrange the lets with guests, provide a laundry service, arrange the cleaning and ensure refuse is collected. Further details are provided in the Premise Management Plan.

Development: Replacement Extension

- 4.7 The proposed extension has been designed in a simple, contemporary-modern style, incorporating materials that are sympathetic to the existing building. Its form and massing remain subservient to the principal structure, ensuring that it does not dominate or detract from the heritage value of the host building. The design has also been carefully developed to avoid any adverse amenity impacts on neighbouring properties, particularly the residential accommodation at 68 Gloucester Road. The scale and appearance of the extension have been thoughtfully considered in response to the diverse and evolving urban context of the surrounding area.
- 4.8 As noted above, two new dormer windows will be inserted into the main roof that will provide access to daylight and fresh air for the additional accommodation.

5 PLANNING REVIEW

Established and Retained Use

- 5.1 The primary and lawful use of the property is within the Use Class E: commercial, business or service category of the Town & Country Planning Use Classes Order (2015), as amended. It has always been in use as a bank although overtime, the accommodation on the upper floors became surplus to requirements and much of the ancillary accommodation appears to have been unused for many years. Following a review of their property requirements, the NatWest Bank closed the Gloucester Road branch in October 2021 and the building was subsequently sold to the applicants. They now have tenants (Building Energy Experts) occupying the ground floor former banking hall.
- 5.2 The Council's Site Allocations and Development Management Policy DM8: Shopping Areas and Frontages establishes an expectation that within Primary Frontages active ground floor uses will be maintained. The policy protects the designated frontages from changes of use and for Primary Shopping Areas lists criteria which need to be met when proposals for alternative uses are put forward. Of the four criteria, the third refers to proposals not resulting "... in a loss of retail floorspace of a scale harmful to the shopping function of the centre".
- 5.3 Policy DM9: Local Centres sets out criteria which must be met with proposals for development. It states: *"In all cases, proposals which would result in the loss of retail floorspace, including storage or servicing space, will be expected to demonstrate that they will not be detrimental to the continued viability of the retail unit."*
- 5.4 In this case, the ground floor space that has been leased to the tenants is based on their particular requirements for flexible accommodation with public access with associated ancillary accommodation, i.e. welfare facilities. It should be borne in mind that as a former bank, the property doesn't benefit from having a large glazed shopfront and so limits the type of potential occupiers who would usually want accommodation within an active frontage and town centre location. The policy requirements are complied with as a ground floor commercial use will prevail.

Apart-hotel Serviced Apartments

- 5.5 The applicants are seeking to create bespoke visitor accommodation for which they have identified a shortfall of provision within the city. The Gloucester Road location is ideally suited to the potential occupiers who would be a mix of people working in the city (professions/academics/hospital works etc) for a particular period of time or tourists looking for shorter stay accommodation.
- 5.6 There are no policies in Bristol's Development Plan that specifically address the issue of serviced apartments or hotels in the city. In such cases, Development Management Policy DM1: Presumption in favour of sustainable development is relevant as it states:

"• Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then planning permission will be granted unless material considerations indicate otherwise taking account whether:

- *Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Nation Planning Policy Framework takes as a whole; or*
- *Specific policies in that Framework indicate that development should be restricted”.*

- 5.7 The proposed development is sustainable and it makes excellent use of a site within the Town Centre. As such, it is in line with Policy BCS20: *Effective and Efficient Use of Land* that promotes development that will maximise opportunities to re-use previously developed land, in order to promote higher densities of development.
- 5.8 Furthermore, Policy BCS7: *Centres and Retail* policy states that Centres will also be focuses for inter alia, “*higher density forms of residential development provided the centre is suitable for such development and has a high level of accessibility by public transport, cycling and walking*”. The policy promotes new mixed-use development in accessible locations, particularly where “*it takes advantage of under-used land.*” In all respects, the proposal complies with the key aims of these policies.
- 5.9 The supporting text (paragraph 4.7.3) to policy BCS7 also promotes residential developments of a higher density which can benefit from the services provided and help to sustain them. The close proximity of the site to local services within the Town Centre, including public transport links (bus and rail services) will ultimately ensure that the site is a desirable location for the future occupiers.
- 5.10 There are no apart-hotels in close proximity to the site, and therefore no over-concentration of such uses. The provision of serviced apartments at the site would add to the diversity and vitality of the area, and complement the function of the Town Centre.

Design and Conservation

- 5.11 The proposal, whilst a high density scheme, has been designed to respond to the particular characteristics of the site and immediate context. The layout, design and appearance of the extension will positively respond to the prevailing character of the area but with a contemporary-modern design.
- 5.12 The potential impact on the amenity of near neighbours has been carefully considered with direct overlooking, loss of daylight or sunlight, or the potential for creating an overbearing impact being avoided. It should be noted that due to the extensive development at the rear of no. 70-72 Gloucester Road, the application proposals will have no demonstrable impact on the amenity of the residential occupiers.
- 5.13 Overall, the design approach will create a high standard of accommodation. To this end, the NPPF identifies ‘good design’ as a key aspect of sustainable development. In this case the proposed development will adhere to relevant design policies and guidance by creating high-quality, sustainable development. As detailed in the Heritage, Design & Access Statement, the building makes a positive contribution to the area.

- 5.14 The National Planning Policy Framework (NPPF) is a strong material consideration in planning decisions, acknowledges the importance of heritage assets, which are an irreplaceable resource, and requires them to be conserved in a manner appropriate to their significance, with great weight given to the asset's conservation. Section 12 of the NPPF deals with *Conserving and Enhancing the Historic Environment* and requires the significance of heritage assets affected by proposals, including any contribution made by their setting, to be considered in planning decisions. This is addressed in the accompany Heritage, Design & Impact Statement.
- 5.15 In this case, the proposed works will ensure the character of the building is preserved and that there will be no adverse effects on it character. Overall, the proposals represent a pragmatic and viable solution for their long-term occupation and conservation of the building which have remained vacant for some time.
- 5.16 It is concluded that the proposals would not result in any harm to the character or appearance of this part of the Conservation Area and the proposals are justified against national legislation, the NPPF and Core Strategy Policy BCS22: *Conservation and the Historic Environment* and Development Management Policy DM31: *Heritage Assets*.
- 5.17 The development is intended to retain the traditional character of the building and the replacement extension will read as a sympathetic contemporary intervention. On this basis, the design is regarded to comply with Core Strategy Development Principles Policies BSC21 *Quality Urban Design* which provides a list of design criteria to which new developments is expected to meet and Development Management Policy DM30: *Alternations to Existing Buildings* which seeks to ensure quality design solutions, appropriate alterations that retain traditional/distinctive features but also, protect the amenity of the host premises and neighbouring occupiers.
- 5.18 The latter has been a key consideration given the close proximity of near neighbours. What has sought to be demonstrated, is that the development will not result in a consequential overbearing impact, nor create adverse overshadowing, loss of light or direct overlooking.
- 5.19 The potential impact on the amenity of near neighbours has been carefully considered with direct overlooking, loss of daylight or sunlight, or the potential for creating an overbearing impact being avoided. The development will have no demonstrable impact on the amenity of adjacent residential occupiers.

Sustainable Design and Construction

- 5.20 The submission includes a Sustainability Statement and Energy Assessment that sets out the heating and renewable energy sources, and the reduction in residual carbon emissions that will arise. As far as practical, the proposals will comply with Core Strategy Policies BCS13: *Climate Change* and Policy BCS14: *Sustainable Energy* and Policy BCS15: *Sustainable Design and Construction*. As calculated in the Energy Statement, the Council's target for 20% of the residual energy demand coming from a renewable source will be exceeded.

Access and Movement

- 5.21 Accompanying the submission is a Transport Statement which includes the results of a parking survey. The Statement confirms the site's location benefits from having excellent access to the public transport network with both bus and rail services (Montpelier Station serviced by the Severn Beach Line) within easy walking distance. Secure cycle storage facilities are provided within a communal store that is accessible for daily use but it is thus likely that walking will be the mode of choice to access the site. The occupiers will have access to the Tier Scooters and this is a quick and convenient means of traveling around the city when walking is considered too far. The removal of the dropped kerb will allow an additional on-street parking space to be created to the benefit of those using the street.
- 5.22 The Statement demonstrates that overall there are considered to be no overriding highways or traffic objections to the proposal as "...safe and suitable access for all uses can be achieved, that the site is accessible by modes other than the private car reflective of the site's location, that parking is severely limited that will set a strict constraint to car use that can be controlled by a Travel Plan, and that there is not a "severe" residual cumulative impact of the development. "
- 5.23 The applicants have no objection to preparing a Travel Plan as a condition of Planning Permission.
- 5.24 Overall, the proposals will comply with the NPPF policies and at the local level, Bristol's Core Strategy Policy BCS10: *Transport and Access Improvements* identifies a number of development principles, which promote in a sequential list sustainable forms of transport, prioritising walking and cycling over public transport and private motor vehicles. The policy also directs developments to locations where sustainable travel patterns can be achieved and which are accessible, and promotes safe streets and negative impacts of vehicular traffic. On this basis, the future serviced apartment occupiers could quite easily live at the property and make use of the range of shops and services that are within easy walking distance.

Refuse and Recycling Storage Management

- 5.25 The future residents will have appropriate provision for refuse and recycling storage as described above; as illustrated on the architect's drawings; and in the narrative in the accompanying the Heritage, Design & Access Statement.
- 5.26 In terms of capacity, Policy DM32: *Recycling and Refuse Provision in New Development* in the Site provides details of required refuse storage provision. The proposal has been designed to accord with latest guidance published by the council. Given the situation, nature of the use and location, the refuse will be readily accessible by staff who will be cleaning rooms and contractors collecting the waste.

Air Quality

- 5.27 As a main road, air quality is generally poor along Gloucester Road and there is a risk of exceedences of the annual mean nitrogen dioxide objective at roadside locations. However, based on other developments (147-149 Gloucester Road opposite the site etc), the operational air quality impacts on the development are likely to be insignificant. On this basis, the proposed development can comply with Core Strategy Policy BCS23 and Site Allocations and Development Management Policy DM33.

Noise Impact

- 5.28 As the site fronts a relatively busy main road, based on other recently consented developments in similar locations, the glazing specification for all windows will be to an acoustic rating of 46 dB Rw with a min performance at 125Hz of 30dB. Further details of these could be provided as a condition of any future planning consent.
- 5.29 Overall, the proposal would create an appropriate level of amenity for the future residents and would provide an acceptable living environment for the proposed student occupiers, in accordance with the relevant Development Plan policies.

6 Planning Balance and Conclusions

- 6.1 This statement and accompanying documents have clearly explained the proposed development and justified the mix of uses and physical development.
- 6.2 The site is located in a highly accessible location and is ideally suited to the proposed apart-hotel use as it is accessible to a range of local facilities and public transport connections. Maximizing the use of the building aligns with the Central Government's agenda, and the proposal represents an excellent opportunity to create residential accommodation for a specific user for which there is a need. Given that the proposal accords with the principles of sustainable development, there are sound reasons for the application to be supported and approved at the earliest opportunity by officers of the Council.
- 6.3 In undertaking a balancing exercise, it is our assessment that the proposals comply with the aims and objectives of the NPPF, as well as the Bristol Core Strategy and Development Management Policies. Similarly, we are of the view that the proposed development is in accordance with section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, and that the character or appearance of the conservation area would be preserved, if not enhanced.

- Appendix 1 –

Concentration of HM0 Data - Emails Exchange

- Appendix 2 -

Land to the Rear of 85 Whiteladies Road Appeal Decision