

NOVEMBER 2025

PLANNING STATEMENT

CASTLE HOUSE, 42 BRENTY AVENUE, BRISTOL BS5 0DL

ON BEHALF OF: **EVANS AV STAGING LTD**

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1. INTRODUCTION

- 1.1 This Planning Statement has been prepared by Stokes Morgan Planning Ltd on behalf of Evans AV Staging Ltd . The applicant has chosen to pursue the Section 62 route, and submit the application directly to the Planning Inspectorate.
- 1.2 It accompanies a full planning application for the partial demolition and re-building of the existing warehouse, including the erection of a second floor extension to facilitate the change of use to 8no flats.
- 1.3 The purpose of this statement is to explain the background to the scheme and provide an assessment of the key planning issues set against the context of national and local planning policy and guidance, and any relevant material considerations.
- 1.4 This statement should be read in conjunction with the following supporting information:
- Completed application form;
 - CIL question form;
 - Drawing no. PL.244.01.00 – site location plan and visual images;
 - Drawing no. PL.244.02.00 – existing sections;
 - Drawing no. PL.244.03.00 - existing ground floor plan;
 - Drawing no. PL.244.04.00 – existing first floor plan;
 - Drawing no. PL.244.05.00 – existing elevations;
 - Drawing no. PL.244.06.00 – existing elevations;
 - Drawing no. PL.244.07.00 - proposed ground floor plans;
 - Drawing no. PL.244.08.00 - proposed first floor plans;
 - Drawing no. PL.244.09.00 - proposed second floor plans;
 - Drawing no. PL.244.10.00 - proposed roof plans;
 - Drawing no. PL.244.11.00 - proposed elevations;

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- Drawing no. PL.244.12.00 - proposed elevations;
- Energy statement;
- Contaminated land risk assessment;
- Preliminary ecological appraisal;
- Bat roost assessment;
- BNG Exemption Statement;
- Tree constraints plan; and
- Transport statement.

1.5 This document is structured as follows:

- Application Site and Surroundings;
- Authorised Use and Planning History;
- Proposed Development;
- Planning Policy Analysis/Balance; and
- Conclusions.

2. APPLICATION SITE AND SURROUNDINGS

2.1 The 430sqm application site lies to the south of Brentry Avenue, close to its junction with Sarah Street. The two roads, together with Tenby Street to the southwest, form a cul-de-sac accessed from the A420 Lawrence Hill, one of the main arterial roads in the city, connecting the eastern suburbs with the City Centre. The site is within the defined Bristol Settlement Boundary.

2.2 The site comprises a single-storey (but commercial scale) brick-built warehouse building, used for storage by the applicant.

2.3 The site is in the Lawrence Hill ward of the city, and the Barton Hill Lower Super Output Area (LSOA). It falls within the adopted East Bristol Article 4 area (restricting

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permitted development rights (PDR) from C3 to C4), is not within a Conservation Area, there are no Tree Preservation Orders, and no other policy designations apply.

- 2.4 There is a bus stop 150 metres to the west for inbound bus services to Bristol City centre, with the outbound bus stop 120 metres to the west. Lawrence Hill railway station is located 190 metres to the east. The Lawrence Hill (designated) local centre lies 50 metres to the north, the St George/Church Road (designated) town centre site is within 550 metres, and the Bristol City Centre boundary commenced 370 metres to the west. Access to the Bristol/Bath cycle path is within 100 metres of the site. The City Academy (Secondary School) lies 380 metres to the northeast, and Barton Hill Primary School lies 500 metres to the southeast. There are three designated Important Open Spaces within 600 metres; Gaunt's Ham Park (which adjoins the site to the south), Netham Park, and Cobden Street amenity area, and Barton Hill Urban Park (non-designated play space) lies within 350 metres to the southeast.
- 2.5 The surrounding area largely comprises residential development. Brentry Avenue comprises terraces of dwellinghouses, whilst the site to the north (on Sarah Street) is currently being developed as nine flats across a four-storey building (planning permission 24/02988/F). The adjoining site to the north (also Castle House) is in Class E office use, having been consented in 2013 (ref: 13/01208/F). To the rear of the site lies Gaunts Ham Park.

3. AUTHORISED USE & PLANNING HISTORY

- 3.1 Historical mapping suggests the warehouse (including the adjoining buildings to the east) were erected in the inter-war years; the '1950's Bristol Town Plans' show the wider building being in use as the 'Bristol Co-op Dairy.' The B8 storage use is longstanding.
- 3.2 The only planning history dates from 1986 (ref: 86/02253/F) when permission was granted for the change of use from camping equipment storage to furniture and domestic storage.

- 3.3 A pre-application enquiry was submitted to the Council last year for a 14-flat scheme on the site, taking a similar form to the current proposal. The response (ref: 24/03684/PREAPP) and submitted drawings accompany this scheme for information purposes. The Council concluded that:

“Overall, while the principle of development is likely to be found to be acceptable, there are concerns in relation to the visual impact of the bulk and scale of the extension to the host building and its impact on the character of the site and surrounding public realm areas. Furthermore, there is concern in relation to the single aspect nature of units and the potential for certain units to be impacted by a lack of natural light and/or impeded outlook. Additional investigation is encouraged regarding the potential for amenity impacts on the most proximal terrace dwellings to the site as well as the consented flats along Sarah Street, particularly with regard to overlooking and loss of privacy. Supporting information pertaining to arboricultural, sustainability, ecological and contamination impacts should also be submitted in support of any full planning submission.”

- 3.4 The scheme has since been reduced to 8 flats, in part to address concerns raised above, and in part due to the potential impact of the pair of trees in Gaunts Ham Park necessitating a redesign of the fenestration and layout.

4. PROPOSED DEVELOPMENT

- 4.1 The proposed description of development is as follows:

“Part demolition and re-building of existing building, including the erection of a second floor extension, to provide 8no. self-contained flats.”

- 4.2 It is proposed to partially demolish the existing building, and to retain/rebuild the Brentry Avenue elevation, the northeast elevation, where it connects through to the remainder of Castle House, and the stone wall which forms the boundary wall to Gaunts Ham Park. The existing dual-pitched roof will be removed, and a flat-roofed, second-floor extension is proposed in its place, set behind the front gable.

- 4.3 Two flats are proposed to the ground floor, and three flats each to the first and second floors. Each of the flats would have four bedrooms, and range in size from 117 to 127sqm. Flats 1, 3, 7 and 8 would be provided with balconies.
- 4.4 A zero-parking development is proposed, with a communal bike store for the flatted development (26 spaces). A communal refuse and recycling store is proposed for the flats (accessed from the street).
- 4.5 In addition to the re-use/matching in with the existing brick and stone, a palette of Anthracite aluminium, zinc graphite cladding and capping, single ply roof, and glass balustrading is proposed.
- 4.6 Air source heat pumps would provide heating and hot water.

5. PLANNING ANALYSIS/BALANCE

- 5.1 The key policy tests and material considerations to be assessed in the determination of this proposal, are:
- Is the principle of development in this location acceptable?
 - Would the development provide an appropriate housing mix?
 - Would the development be out of scale or incompatible with the surrounding area?
 - Would the development harm the residential amenity of neighbours?
 - Would the development provide adequate living and amenity space for future occupiers?
 - Would the proposal impact on highway safety or parking?
 - Would the proposal adequately meet objectives of sustainability and climate change?
 - Does mandatory biodiversity net gain apply to the site?
 - Would the proposal impact on protected species?
 - Would the proposal impact on nearby trees?
 - Would the proposal address the potential risk of land contamination to future occupiers?

- Planning balance.

5.2 These considerations are addressed separately below. Where appropriate, reference will be made to the pre-application response provided by Bristol City Council.

Key Considerations

Is the principle of development in this location acceptable?

- 5.3 Policy BCS8 states that, employment land outside of the designated PIWAs (Principal Industrial and Warehousing Areas) will be retained where it makes a valuable contribution to the economy and employment opportunities. As a B8 use, the site would constitute employment land.
- 5.4 DM12 similarly seeks to retain employment sites unless it can be shown one of four criteria can be met, including, at bullet point ii, that continued employment use would have an unacceptable impact on the environmental quality of the surrounding area.
- 5.5 The National Planning Policy Framework (NPPF) highlights that substantial weight should be given to the value of using suitable brownfield land within settlements for homes and other identified needs (paragraph 125c) and it is also clear that decisions on planning applications need to reflect changes in the demand for land (paragraph 127).
- 5.6 The site has an unfettered B8 use, with no time restrictions on deliveries or hours of operation. Given the surrounding residential development, it is unlikely that such a use would be granted if applied for afresh today, and whilst the applicant is not aware of any complaints having been made, they no longer require the site, and it cannot be guaranteed that future occupiers would not generate noise and disturbance that would have an unacceptable impact on the environmental quality of the surrounding area.
- 5.7 The site has no parking, the roads in the vicinity are narrow, access is poor (and exacerbated by the prevalence of pavement parking) and the vehicular access

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to the building adjoins the pavement. These factors all raise highway safety concerns for continued B8 use, which could include, as a final-mile distribution centre, and a corresponding increase in vehicular movements.

- 5.8 Given the surrounding residential uses, and the impracticalities of access, it can be demonstrated that the site is not considered to be high-valued employment land, and constitutes a bad neighbour use which could result in harmful impacts on the environmental quality of the surrounding area.
- 5.9 In this context, and given the economic benefits of the scheme (in the short-term, through construction jobs, and in the long-term, through increased spending in the local area), the loss of a small amount of employment floorspace (whether B8, B2, or Class E(g)) would be compliant with the relevant suite and national and local planning policies.



Existing vehicular access

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Approach to site from Sarah Street

- 5.10 With regards to the suitability of the site for housing, the site falls within the Inner East Regeneration Area and is covered by BCS3, which states that, “*development will include the provision of around 2,000 new homes.*” The policy also seeks to retain employment sites, but this issue has been covered above.
- 5.11 BCS20 states that effective use of brownfield land should be sought by promoting development on previously used land. Where development is planned opportunities will be sought to use land more efficiently across the city. Imaginative design solutions will be encouraged at all sites to ensure optimum efficiency in the use of land is achieved. Higher densities of development will be sought both in and around the city centre, close to other centres; and along or close to main public transport routes.
- 5.12 This is in line with national policy within the NPPF, particularly §125(c), which requires policies and decisions to give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused, and §128(a), which states that Councils should support proposals to use retail and

employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors or sites.

5.13 Given the Council's housing supply issues (discussed later in this statement), and the site's proximity to the City Centre, the Lawrence Hill local centre, the St George/Church Road Town Centre, Lawrence Hill Railway Station and the A420 (a main public transport route), the site clearly represents a location where housing should be encouraged. The 8 flats proposed would deliver housing at a density of 200 dwellings per hectare, which is considered appropriate for this highly sustainable location.

5.14 On this basis, the principle of residential development, and the loss of commercial floorspace, would both be compliant with local and national planning policy.

Would the development provide an appropriate housing mix?

5.15 Policy BCS18 requires all new residential development to maintain, provide or contribute to a mix of housing tenures, types and sizes to help support the creation of mixed, balanced and inclusive communities; contribute to the diversity of housing in the local area and help to redress any housing imbalance that exists; and respond to the requirements of a changing population.

5.16 The supporting text states that the increasing concentration of flats at high densities in certain parts of the city may not provide opportunities for families. It goes on to state that evidence provided in the Strategic Housing Market Assessment suggests that new developments should provide or contribute to a mix of housing types and avoid excessive concentration of one particular type. This should include the provision of more family sized accommodation.

5.17 The SHMA was updated in February 2019 for the wider Bristol area. This predicts that households with children will remain constant, at 26.2%, and that the need for 3-bed houses will increase by 17.6%.

5.18 Further to the 2019 SHMA, the LPA published the "City of Bristol Local Housing Needs Assessment Report of Findings" (November 2023), as a background paper to the

new Local Plan. This predicts that, for the period 2020-2040, families with dependent children will make up approximately one fifth of the overall household growth (9,000, 19%).

- 5.19 On the 9th July 2025, the *Bristol Post* website carried a report¹ that despite the population of the city exceeding 500,000 for the first time ever, *“the falling birthrate and an exodus of families with young children out of the city means there will be almost a thousand empty places in Bristol's primary school Reception classes for a second year running this September.”*
- 5.20 Whilst it does not cover the site, policy BCAP3 of the Central Area Plan states that a substantial proportion of family sized housing will usually be sought in, inter alia, areas of Lawrence Hill that lie within the plan boundary. The site is outside, but within 165 metres of the plan boundary. As such, BCAP3 is considered to be a material consideration.
- 5.21 The scheme would provide 6no. four-bedroom flats, and 2no. three-bedroom flats. Only two of the bedrooms across the site would be single bedrooms (one each to flats 6 and 8), and all eight flats would meet or exceed National Space Standards, making them ideal , family-sized units.
- 5.22 The 2021 Census data reports that in the Lawrence Hill ward, houses comprises 32% of the total stock of residential accommodation (25% at LSOA level). The city-wide figure is 67%. This is to be expected however, given the central location.
- 5.23 At ward level 6% (all figures rounded to the nearest whole number) of dwellings were four bedroom or more, 18% were three bedroom, 45% two bedroom, and 31% one bedroom. This compares with city-wide figures of 17%, 40%, 28% and 16% respectively.
- 5.24 Whilst the imbalance between flats and houses is noted, the provision of houses on this site would not represent an efficient use of land. What the proposal would

¹ [Bristol schools crisis as 1,000 Reception places empty for September | Bristol Live](#)

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undoubtedly provide is, large, family-sized dwellings in an area where such housing is clearly lacking, resulting in families opting to leave the area, and a reduction in school enrolment numbers. This is evident at the nearest primary school, Barton Hill Primary School, which received 26 applications for 60 places for 2025/26², and which has 265 pupils against a capacity of 420.³

- 5.25 In this context, the delivery of family-sized housing, whether housing or flats, would ensure that the aims of BCS18 would be met.

Would the development be out of scale or incompatible with the surrounding area?

- 5.26 Policy BCS21 states that new development should contribute positively to an area's character and identity, whilst policy DM30 states that the alterations and extensions to existing buildings should respect the siting, scale, form, proportions, materials, details and the overall design and character of the host building, its curtilage and the broader street scene; and Retain and/or reinstate traditional or distinctive architectural features and fabric. In a similar vein, policy DM26 requires development to respect the local pattern and characteristics, and to respond to the height, scale, massing, shape, form and proportions of existing buildings. Finally, policy DM27 requires development to respect the layout and form of existing development, and states that proposals should not prejudice the existing and future development potential of adjoining sites or the potential for the area to achieve a coherent, inter-connected and integrated built form.

- 5.27 The existing building has an attractive brick-built frontage on to Brentry Avenue, which matches the adjoining building from which it was sub-divided, and contrasts pleasantly with the terraced dwellings to this side of Brentry Avenue, which have largely been rendered and painted in a variety of colours. The gabled front elevation includes a round window above the entrance, at an equivalent of second-floor level. The Gaunt's Ham Park elevation incorporates the stone boundary wall to the park. The flat roof area adjacent to 41 Brentry Avenue is currently secured with barbed wire, which detracts from the appearance of the

² [Bristol school reception places and admissions policies](#)

³ [E-Act Barton Hill Academy - GOV.UK](#)

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building and the wider street scene. The Gaunt's Ham Park elevation is also topped with barbed wire, which has a similarly negative impact on the historic value of the park.

5.28 The pre-application response stated that:

"The site is not located within a conservation area, however it is noted that the existing building has a distinctive character which would be partially preserved within submitted proposals, and this is welcomed... Concern was raised that the extended storey could appear as an overly dominant, bulky and unsympathetic addition to the building when viewed from the public realm as a result of its form, scale and minimal set-back from the retained Brentry Avenue frontage. Officers recommend that a 3D model be provided and/or imagery from sensitive viewpoints submitted, showing the impact of the extension on the character of the existing building, as well as on the established street scene. While a contemporary addition in this location is not resisted in principle, it is recommended that the design approach be carefully considered in terms of how a roof extension may best complement the host building and adjoining buildings, both in terms of its form and proportions as well as detailed design and the material palette to be used. Given the heritage status of the park, appropriately high quality materials should be utilised for any new fenestration to this elevation, should the significant intervention into the boundary wall be concluded to have an acceptable impact on the historic value of the park."

5.29 The site address is given as Brentry Avenue, though the wider Castle House site would more accurately be considered to form part of Sarah Street. Whilst Brentry Avenue dates from the late 19th century, the application site was erected, as the Bristol Co Op Dairy in 1920, and attached to the flank of 41 Brentry Avenue. As such, the site is visually distinct from the dwellings on Brentry Avenue, but not uncomplimentary; a Lowry-esque setting redolent of a bygone era when factories and dwellings sat cheek-by-jowl.

5.30 The design approach seeks to largely retain the building envelope, including the stone boundary wall to the park, the front gable and the round feature window

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(which would serve the bedroom to flat 7). The side and rear elevations would be taken down, and the brick (or a matching equivalent) re-used to build back up above the park boundary wall.



Proposed Gaunt's Ham Park elevation

- 5.31 The proposed second floor extension would sit behind the parapet wall, set back 1 metre, increasing to 2.7 metres where the balconies are proposed for flats 7 and 8, to reduce the bulk of the addition when compared with the pre-application submission. A contemporary design approach has been retained, with zinc cladding proposed; a commonly-accepted design approach for upward extension of brick-clad buildings of this era, which, in respect of the Gaunt's Ham Park elevation, complements the stone boundary wall at ground floor level, and frames the brick sections at ground and first floor levels (though these will appear as first and second floor levels from the park, given the lower ground levels at the park).
- 5.32 Further consideration has been given to the Gaunt's Ham Park elevation, and the design approach is to provide vertical emphasis, with French doors and Juliet balconies, full-height fenestration to the stairwell. To continue this vertical emphasis,

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it is proposed to create a 'bay effect' to the sections containing the Juliet balconies, by incorporating the vertical expansion joints into the façade design, and raising the parapet heights, thereby avoiding a large, flat expanse of brick wall addressing the historic park.



Proposed Brentry Avenue elevation

- 5.33 The Juliet balconies and stairwell windows at ground floor level would be cut into the top of the stone boundary wall, sitting just below the coping stones, to provide a further degree of articulation between the stone and brick sections of this façade.
- 5.34 To the Brentry Avenue elevation, the applicant has sought to address the concerns raised at the pre-application stage by stepping the second floor extension back twice, to reduce its real-world visibility from vantage points on Sarah Street on the approach to the site, and to avoid over-dominating the adjacent terrace. The gable front would retain primacy, and the second floor extension would have a lower ridge height than both the gable apex, and the existing terrace.
- 5.35 In respect of the potential to prejudice future development, given the proximity of the consented scheme to the north, it is not considered that the service yard/access could be developed without impacting on the amenity of occupiers

of those flats, resulting in severe overshadowing. Even if this was not the case, and the two sites were brought forward as a single scheme, the depth of the two sites would limit the amount development that could take place within the access yard, as it would not be possible to provide adequate residential amenity. Notwithstanding that the site is in active commercial use, it is likely that any redevelopment of that site would have to be within the existing footprint. As such, the proposal would not prejudice future redevelopment, and suitable distances between windows, which would be at right-angles to each other in any case, could be achieved.

- 5.36 The proposal is therefore considered to be of an appropriate design which would respect the character of the area and the host dwelling, and meet the requirements of policies BCS21, and DM26, DM27, and DM30.

Would the development harm the residential amenity of neighbours?

- 5.37 Policy DM30 requires extensions to proposals to ensure that existing and proposed development achieves appropriate levels of privacy, outlook and daylight. Policy BCS21 states that new development should safeguard the amenity of existing development. Policy DM27 expects that new development will *"enable existing and proposed development to achieve appropriate levels of privacy, outlook and daylight."*
- 5.38 As part of the pre-application response, the Council noted potential areas of concern, including overshadowing of 41 Brentry Avenue, prejudicing the development of the adjoining warehouse through window placement, and loss of privacy to the approved scheme to the northeast.
- 5.39 In respect of 41 Brentry Avenue, given that the second floor extension would lie to the northeast of that property, be stepped back from the existing building, and would not project beyond the parapet wall to no. 41, no overshadowing would ensue, and it would be no more overbearing than the existing terrace. New windows are proposed to the elevation nearest to the dwelling, but these would be obscurely-glazed up to 1.7m finished floor height, to avoid potential overlooking

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issues. The windows to the Gaunt's Ham Park elevation would result in no more overlooking than currently occurs from first floor windows from the remainder of the terrace, and would generally oversail the garden to no. 41.

- 5.40 The front elevation of the adjoining warehouse is set back some 16 metres from the highway, and the front elevation of the application site. This area provides access to the warehouse, and a service yard. The proposal includes fenestration to this flank, though it should be noted that due to the sloping ground, the only ground floor window serving habitable accommodation (one of the bedrooms to flat 2) would have a sill 1.8 metre above ground level.



Approved site plan and typical floor plan (24/02988/F)

- 5.41 The approved scheme to the northeast projects beyond the entrance to the adjoining service yard, and includes balconies/courtyard areas to the southeast elevation, surrounded by privacy screens, presumably to avoid prejudicing the future development of the application site. The nearest windows to the application site are broadly level with the front elevation of the building, and so would not be directly overlooked by the northeast elevation windows. Again, it assumed that the Council requested this layout to ensure that the future redevelopment of Castle House would not be prejudiced.
- 5.42 In conclusion, the proposals would preserve the amenity of neighbouring properties.

Would the development provide adequate living and amenity space for future occupiers?

- 5.43 The NPPF states that policies and decisions should ensure, inter alia, a high standard of amenity for future and existing users. It advises that policies may also make use of the nationally described space standards, where the need for an internal space standard can be justified.
- 5.44 Policy BCS18 requires development to provide sufficient space for everyday activities, which should be flexible and adaptable, by meeting appropriate space standards, though it does not formally adopt the National Space Standard (NDSS). It also states in the supporting text that building to suitable space standards will ensure new homes provide sufficient space for everyday activities, and that homes can also be used more flexibly and adapted more easily by their occupants to changing life circumstances.
- 5.45 The NDSS requires 117sqm for a four-bedroom, eight bedspace (4b8p) flat, 108sqm for a four-bedroom, seven bedspace flat, 95sqm for a three-bedroom, six bedspace flat, and 86sqm for a three-bedroom, five bedspace flat.
- 5.46 Flats 1-4 are proposed as 4b8p flat, with 117 (1 and 3)/127 (2 and 4) sqm of floorspace. Flats 5 and 6 are proposed as 4b7pflats, with 111/109sqm of floorspace. Flat 7 is proposed as a 3b6p flat, with 11.95sqm of floorspace, and flat 8 as a 2b5p flat with 87sqm of floorspace. As such, all flats would be NDSS-compliant.
- 5.47 All flats would be dual-aspect, with six of the flats benefitting from views across the park. It is acknowledged that flats 5 and 7 would have northeast and northwest aspects only; given the depth and orientation of the building, it was not possible to arrange the flats in a practical layout that would afford all flats both north and south elevations, and a lack of aspect towards the southern half of the compass for these flats is not ideal, the architect has had to work within the constraints the existing building and site to provide the best layout overall.
- 5.48 The Council's Urban Living SPD states that a minimum of 5sqm of private outdoor space should be provided for 1-2 person dwellings, with an extra 1sqm for each

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additional person. It goes on to state that this can be provided as private balconies, roof terraces or communal gardens.

- 5.49 As with the aspects, the existing built form limits the amount of private amenity space that can be provided. Flats 2 and 3 would each have 3.5sqm balcony areas, looking out towards the park, whilst flats 7 and 8 would have 9/11sqm balconies overlooking Sarah Street. Juliet balconies (to the living rooms and a bedroom of flats 2, 3 and 6, to the living rooms of flats 5 and 8, and serving a bedroom to each of flats 4 and 7) are also proposed, allowing greater levels of free flow of air through the units.
- 5.50 In addition, and as noted earlier in this statement, the site is also within easy walking distance of a variety of designated Important Open Spaces, including the adjoining Gaunt's Ham Park, (which can be accessed from the southwestern end of Brentry Avenue, within 100 metres) and as six of the flats have views of the park, parents could watch over their children (of a suitable age) from the flats as they used the park. This increased natural surveillance of the park was also seen as a design positive with the pre-application response, which noted that it would increase utilisation of the community space and fostering the development of a more positive space.
- 5.51 As such, all occupants would have suitable access to good quality outdoor space; the pre-application response went on to note that the site is on the edge of a designated local centre where higher densities of development may be found to be acceptable, and that Gaunt's Ham Park, whilst not private, would provide amenity space in the immediate vicinity.
- 5.52 In summary, the proposals would provide a good standard of accommodation, in accordance with BCS18 and DM30.

Would the proposal impact on highway safety or parking?

- 5.53 Policy BCS10 requires development to be located where sustainable travel patterns can be achieved, whilst policy DM23 requires development to provide safe and adequate access on to the highway network and provide the appropriate level of

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parking. Policy DM32 relates to recycling and refuse storage, and requires sufficient space to be required, and safe and convenient access to be provided for both occupants and operatives. Parking standards are based on a maximum provision with no minimum standard specified.

- 5.54 As outlined both in section 2 above, and the accompanying Transport Statement, the site is in a highly sustainable location, close to bus stops a railway station, local schools and services.
- 5.55 A communal bike store is proposed for the 8 flats, with 26 spaces provided (3 per bedroom for the 6no. four-bed flats, and 2 per bedroom for the 2no. three-bed flats, plus two visitor spaces), accessed from the street and via a 1200mm wide corridor, and a sliding door into the cycle store. Separate stores are also proposed at ground floor level for each flat, which can be used for cycle equipment, pushchairs etc.
- 5.56 A communal refuse and recycling store is also proposed for the flats, accessed from Brentry Avenue, comprising sufficient capacity for 8no. flats. A waste management plan could be secured by condition if necessary, with either a management company being responsible for bringing the containers out on collection day (to be stored on the pavement fronting the site) and returning them to the store afterwards, or Bristol Waste operatives being provided with access to the store.
- 5.57 A zero-parking scheme is proposed, which is considered appropriate given the highly sustainable location. Justification for this is provided within the Transport Statement, which notes the low level of car ownership locally, and that the site would be marketed as car-free, and so buyers would know in advance that there is no on-site parking. It is also noted that within the pre-application response, the Council's Transport Development Management Team did not object to 14 flats on a car-free basis, due to the availability of sustainable transport options.
- 5.58 In conclusion, the development would continue to be acceptable on highway safety or parking.

Would the proposal adequately meet objectives of sustainability and climate change?

- 5.59 Policies BCS13 requires proposals to mitigate and adapt to climate through their design and construction. Policy BCS14 requires proposed development to reduce carbon dioxide emissions from residual energy use by at least 20%. Policy BCS15 requires design and construction to be sustainable, with residential development expected to meet Level 6 of the Code for Sustainable Homes assessment. This Code however was abolished in 2015, and the relevant elements incorporated into the Building Regulations, and set at an equivalent to CSH Level 4. Policy BCS16 requires all development to incorporate water management measures to reduce surface water run-off to ensure that flood risk is not increased elsewhere, including the use of sustainable drainage systems.
- 5.60 DM30 states that proposals that would sensitively adapt existing buildings to alternative uses as an alternative to demolition will be supported, as will proposals that would retrofit existing buildings with sustainability measures.
- 5.61 The accompanying energy statement confirms that the development would exceed the 20% reduction required, with the retrofitting of sustainability measures in the form of air source heat pumps proposed (plus improvements to the building fabric as part of the adaptation from commercial to residential), achieving a 73% reduction in carbon emissions.
- 5.62 The site is shown to be at very low risk from surface water flooding (as is the highway to the front) and lies within Flood Zone 1. The existing site is currently completely hard surfacing and built form, and upward extensions only are proposed. Therefore the proposal would not increase the risk of flooding elsewhere.

Does mandatory biodiversity net gain apply to the site?

- 5.63 The application site is wholly developed and 100% hard surfacing, and as such would be exempt from mandatory 10% BNG. A BNG Exemption Statement duly accompanies this application.

Would the proposal impact on protected species?

5.64 The accompanying preliminary ecological report confirms that the site has negligible potential for bird or bat roosting, and no further surveys are required. The report also recommends ecological enhancement measures (bat tubes, swift boxes etc). Whilst 10% BNG is not required, Should the Inspector consider a net gain is necessary, a condition to secure the installation of bird and bat boxes could be imposed.

Would the proposal impact on nearby trees?

5.65 Policy DM17 details that development should integrate important existing trees, and that where tree loss or damage is essential to allow for appropriate development, replacement trees of an appropriate species should be provided.

5.66 Whilst there are no trees on site, there are 2no. sycamore trees within the park, close to the boundary with the site. The accompanying tree survey concludes that the root protection areas are unlikely to extend into the site (due to the presence of the boundary wall), and that the canopies presently overhangs the boundary (though the landowner does of course have common law abatement rights to remove these branches.

5.67 The pre-application scheme proposed 14 flats, however this relied on having a central stair core, with three flats per floor addressing the park. This cannot be achieved given the siting of the trees, as the trees would block light to the windows of the flats, thereby increasing pressure on the Council to fell the trees, or providing poor outlook and light levels.

5.68 To address this issue, the stair well has been positioned behind the trees, as the failure to provide suitable outlook and natural light to this non-habitable area would not be an amenity issue.

5.69 There would be some loss of light to the high-level windows serving the kitchen areas of flats 1, 3 and 6, however these are secondary windows, and the wider living space would also be served by the French doors which are not expected to be

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obstructed by the outermost branches of the trees, which appear to be subject to regular maintenance by the Council's Parks Management Team.

5.70 There would be some reduction in light to one of the double bedrooms to both flats 1 and 4, from the outermost branches, but in the context of these both being four-bedroom flats, the overall levels of amenity to both flats would not be unduly impacted by the trees. Similarly with the single bedroom to flat 8, though the impact to this window would be further reduced by the stepping back of the second floor behind the parapet wall, and away from the trees, and continued tree maintenance to keep branches from crossing the boundary line.

5.71 The Arboricultural survey confirms that the proposed works can take place without impacting on the health of the trees, subject to suitable protective fencing during the construction phase, which can be secured by condition.

Would any issues arise with regards to unstable or contaminated land?

5.72 Policy DM34 requires development to ensure that any existing contamination of the land will be addressed by appropriate mitigation measures, whilst policy DM37 requires proposals in the High-Risk Coal Mining Areas to be supported by a suitable desk-based assessment. The Mining Remediation Authority's online mapping confirms that the site is within the Coal Mining Reporting Area, but outside of the High-Risk area.

5.73 The accompanying Phase 1 geo-environmental desk study report concludes that risks associated with the past use of the site are low, and that intrusive investigation should be undertaken to establish geotechnical parameters for the design of foundations, floor slabs and pavement construction for the proposed new structures and surrounding area. Accordingly, this could be secured through the appropriate pre-commencement condition.

Planning balance

5.74 The Council has had a housing supply shortfall since June 2021, when changes to the standard method published in December 2020 came into force. At the time, its

supply was at 3.7 years, and it has not updated its website with a five year housing land supply report since June 2021. It has dropped as low as 2.2 years, and the latest position made available is 4.14 years (BCC Examination note – 5 year housing land supply (prepared in response to Inspectors' document IN9), as part of the current Local Plan examination). Furthermore, its housing delivery test results for the last six years are (in chronological order from 2018 to 2023) are 99%, 87%, 72%, 74%, 88% and 75%.

- 5.75 With §11d of the NPPF thus engaged, the provision of 8no. additional dwellings, would make a more efficient use of the land, and in the context of the Council's current Housing Delivery and Land Supply issues, this should be given significant weight. That these flats would all be family-sized dwellings, in an area where smaller units dominate, and where the local primary school is under-subscribed, should be given moderate weight.
- 5.76 Moderate weight should also be given to the increased natural surveillance of Gaunt's Ham Park that the development would provide, and to the visual betterment of the site through the removal of the barbed and razor wire that currently top the building, for security reasons.
- 5.77 The proposal would provide general economic benefits in the form of construction jobs and local investment, increased local spending, and the inward investment that this invariably attracts, and general environmental benefits through the provision of energy-efficient dwellings.
- 5.78 Weighing against the proposal are the potential impacts on the 2no. sycamore trees within Gaunt's Ham Park, in terms of requiring increased maintenance to ensure there is no amenity impact on future occupants. Some of this maintenance could be carried out by the management company, to address any overhanging branches, but works on the park side would be the responsibility of the Council. However, the trees are evidently already maintained, and the site has been laid out to minimise impacts on habitable rooms.

- 5.79 The flats would have limited private amenity space, however given the proximity of Gaunt's Ham Park, and the provision of good quality outdoor space, this should weigh little to modestly against the proposal. For similar reasons, whilst flats 5 and 7 would have only northerly aspects, in the context of the scheme as a whole, this should weigh only modestly against the proposals.
- 5.80 The benefits identified above would not be significantly outweighed by the tree and amenity impacts, and for this reason, it follows that consent should be granted.

6. CONCLUSIONS

- 6.1 The current warehouse and storage use is no longer required by the applicant, and its future use by another party for that purpose could be considered a bad neighbour in this largely residential context. The site is in a highly sustainable location, and the provision of 8 family-sized dwellings would make a much more efficient and suitable use of the land, and in the context of the Council's current Housing Delivery and Land Supply issues, this should be given significant weight.
- 6.2 The applicant has taken the Council's pre-application advice to address design concerns, and the proposal would successfully integrate the site into the existing streetscene. The principle of car-free development was accepted by the Council, and the scheme would provide suitable amenity for both existing and future residents.
- 6.3 For these reasons, it is hoped that the Inspector can support this proposal, and grant planning permission.