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section62anonmajor@planninginspectorate.gov.uk

10 December 2025

Dear Section 62A Applications Team

Subject: Formal and Strong Objection to Section 62A Planning Application: S62A/2025/0137 - 72-74 Gloucester Road, Bristol, BS7 8BF

I wish to formally object to the planning application referenced S62A/2025/0137 for the partial change of use, demolition and extension at 72-74 Gloucester Road, Bristol, BS7 8BF.

I objected, along with 60+ other neighbours who also objected, to this planning application in October 2023 when it was originally submitted to Bristol City Council. However, I understand that none of the objections raised then are carried forward to this Section 62A application to the Planning Inspectorate.

I have incorporated my original objections below as these still stand and remain relevant in the context of the current application, as well as several other fresh points. It is disappointing to note that, despite the huge number of objections raised, the developer has made no changes to the original application showing huge disregard for the feelings of the local community despite their assertions to have assessed the potential impact on near neighbours. Additionally, there are several inaccuracies in the documentation submitted by the applicant (highlighted within my comments below).

I believe there are severe conflicts with the Development Plan as well as established material planning considerations:

1. Severe Impact on Residential Amenity and Local Character, along with Relevant Precedent and Local Housing Context:

In summary, this development:

- Is wholly out of character with the established residential setting on the neighbouring streets on the west side of Gloucester Road;
- will cause an erosion of community - the proposal offers no benefit to the local community and continues a worrying trend towards reducing this family centric residential area to a transient, tourism-oriented centre, undermining the quality of life for long-term residents;
- will add to existing noise and disturbance (increased late-night and early-morning noise, including slamming car doors, luggage handling, and associated anti-social behaviour) and directly and detrimentally affect the residents of Shadwell Road, particularly those immediately adjacent to the development.

I have been a resident of [REDACTED], [REDACTED] [REDACTED]. It has always been a family-orientated street. Although there are a couple of houses which are arranged as pairs of flats, and a few more are rented to professional people, the overwhelming feeling is of a family and community environment. This redevelopment is completely at odds to the character and community already established. The occupants will be completely transient residents who will have absolutely no interest in contributing to the local community or neighbourhood and merely use it as a convenient stopping point.

Paragraph 5.5 of the applicant's Planning Supporting Statement, produced by Aspect360, states, "the applicants are seeking to create bespoke visitor accommodation for which they have identified a shortfall of provision within the city" and paragraph 6.2 "the proposal represents an excellent opportunity to create residential accommodation for a specific user for which there is a need". However, no evidence has been provided to identify or support this supposed "need".

Paragraphs 5.6-5.10 of the applicant's Planning Supporting Statement make several references to the proposed development being in line with existing Bristol City Council Development Management Policy, National Planning Policy Framework, and Policies BCS7 and BCS20, specifically "higher density forms of residential development" being suitable "within a Town Centre". Additionally, paragraph 5.10 states "there are no apart-hotels in close proximity to the site, and therefore no over-concentration of such uses". These statements are disingenuous and misleading. Firstly, a simple search on AirBnB, reveals that there are over 1000 self-contained serviced apartments or houses available suitable for 1-2 people in Bristol, of which at least 60+ are in very close proximity to the Gloucester Road corridor (from Horfield Leisure Centre, i.e. close to Southmead Hospital, down to the St James Barton roundabout. Secondly, there are several HMOs as well as, more significantly, a high-density residential development at 147-149 Gloucester Road with 58 bed spaces (across 16 units) which is directly opposite 72-74 Gloucester Road, of which Aspect360 would be aware of because they were also involved with that development and planning application.

This is especially relevant when considering what the applicants say the development is proposing to offer, i.e. in their words, "short stay accommodation...limited to a minimum of 5 days and a

maximum of 180 days” (para 4.3 of the applicant’s Planning Supporting Statement); “bespoke visitor accommodation...who would be a mix of people working in the city (professionals/academics/hospital works (sic.) etc) for a particular period of time or tourists...” (para 5.5 of the applicant’s Planning Supporting Statement). However, this is then later contradicted in paragraph 5.29 under Noise Impacts, which state “the proposal...would provide an acceptable living environment for the proposed student occupiers”. If we accept that the former described use is true (i.e. not student accommodation but is for tourists and working professionals), again as previously stated, I cannot see where the shortfall exists. If it were to provide student accommodation, again I think it is safe to say with existing significant and large ongoing developments of student accommodation in Bristol and South Gloucestershire, there is not a shortfall of student accommodation. Additionally, with the fall in overseas student numbers and contraction in the birth rate, universities are already concerned about the reduction in student numbers. (I have worked for both local universities so have considerable knowledge in this area.)

The number of apartments proposed is completely unrealistic within the space available even with a new rear extension and as such the application is an **overdevelopment** of the site, designed to maximise income and profit, **not to meet a local demand**. Changing use to a 9-room apartment hotel will mean the **loss of a potential long-term, hopefully affordable, home for local people/families**, the demand for which has been well documented in the local and national media unlike the “shortfall in provision in the city” of “apart-hotel serviced apartments” which has not. This type of short-term rental conversion is often resisted due to the negative impact on residential character and housing stock. Many urban local authorities are now introducing strict policies to protect residential amenity and local housing supply from similar transient accommodation uses. While not a direct precedent, these widespread resistance efforts underline the generic harm that C1 Apart-Hotels can inflict on highly-pressured residential areas, a situation which is already extreme in Bristol. If the proposal was for one or possibly two flats (preferably rented to families) then that would have been much more acceptable. The proposal for nine apartments is merely maximising the space on a very minimal sq. footage per apartment for a very commercial venture, which will only profit the owners and nobody else.

If the development was next to either of the City’s Hospitals, main business districts, Universities or main transport hubs such as Parkway, Temple Meads or the Bus Station, especially given the applicant’s expectation that occupants will travel to the accommodation via public transport, it would potentially make more sense. Additionally, if we accept that people will travel via public transport, and not use their cars (which I disagree with), they will need to take more than one mode to reach the accommodation and why would they do this (with their luggage) when there is already plenty of short-term accommodation elsewhere in Bristol, much closer to the main transport hubs. This is a location where there is a demand for affordable family accommodation, not an apartment hotel.

While we are used to occasional noise from the businesses on the Gloucester Road, and of the students coming home from nights out who live further on from the top of the road to the west, the development will **detrimentally impact on the quality of life in our neighbourhood**, due to the likely **increase in noise, disturbance and other anti-social behaviour** from additional transient residents who are not part of, nor invested in, the local community.

To reiterate, whilst the official address is Gloucester Road, the site is essentially at the end of Shadwell Road, which is a street wholly comprising residential properties, (either homeowners or long-term renters) with a strong community feel. The proposals are not in-keeping with this, as they will create a significant transient element which will weaken the established community and are therefore in conflict with Paragraph 9 of the National Planning Policy Framework (NPPF) which state that planning decisions should take local circumstances into account, to reflect the character, needs and opportunities of each area. They are also in conflict with paragraph 135(f) of the NPPF which state developments should not undermine community cohesion and resilience. Consenting this development will not benefit the community, only a private developer, whereas it will negatively impact the majority of residents on Shadwell Road, surrounding streets and local business owners almost daily, whilst fundamentally altering the established community nature of the street.

2. Unacceptable Highway Safety and Parking Issues

In summary, this development will lead to:

- **Increased Vehicle Volume:** The proposal could generate demand for up to 9-18 additional cars/vehicles (guest drop-offs, maintenance, cleaning staff) in this precise location. This will render the already problematic parking situation unsustainable for existing residents and make accessing nearby shops more difficult for business owners and patrons;
- **Dangerous Junction:** The increased traffic and parking on an already dangerous junction will compromise highway safety for residents, shoppers, and most importantly, children accessing Gloucester Road from our and neighbouring streets;
- **Unsustainable Parking Demand:** The development is car-free but fails to acknowledge the high dependency on vehicle access in this unique location, leading to unmanageable parking stress and safety risks. Shadwell Road already suffers from huge parking problems; it is often permanently full, with vehicles regularly parking dangerously on double yellow lines, at the junction, and partially on pavements.

This development will inevitably **add to existing pressures on traffic and parking and exacerbate existing dangers on the highway** along Shadwell Road and at its junction with Gloucester Road as well as on neighbouring streets.

It is a commendable aim on the part of the Council and Planners to assume sustainable travel methods will be adopted by the users of developments, (I personally walk as much as possible) but it simply not our lived reality in this location despite the nearby existing public transport options. This aim (to promote sustainable public transport options and discourage car use) was also stated when 147-149 Gloucester Road (directly opposite the end of Shadwell Road and the proposed development) was redeveloped into Student Accommodation. Despite this, a significant number bring and park their cars on Shadwell and neighbouring roads as, quite frankly, there is no law or rule stopping them. I do not see why the outcome from this development will be any different, potentially adding up to 18 additional vehicles looking for parking on the adjoining streets.

Additionally, paragraph 3.4.1 of the applicant's Transport Statement, states that the nearest bus stops have shelters, seating and countdown/real time public information for both directions of travel". This is only correct for northbound travel NOT southbound (towards the city centre) which is a simple stop, with no shelter, seating or real time information.

Shadwell Road is a busy road with people parking for an hour or two to visit the shops and have a coffee with their friends. This is partly possible because local residents use their cars to go to work elsewhere in the morning and return in the evening. This kind of parking is vital to the livelihood of the Gloucester Road retailers, and without this the reality is that many would go out of business. However, parking is already well beyond capacity and any further losses will either deter shoppers, impacting on the ongoing viability of Gloucester Road shops when the retail sector is already challenged, and/or will lead to ongoing and increased dangerous parking on the junctions at the top and bottom of Shadwell and neighbouring roads.

Paragraph 3.5.3 of the applicant's Transport Statement, states that the parking surveys were undertaken on dates in June 2024 (specifically the 18th, 19th, 21st & 22th) which were considered 'representative being within university term time'. This is inaccurate. The University of the West of England's term (for both teaching and assessments) finished on 24 May 2024 and the University of Bristol's term (again for both teaching and assessment) ended on 7 June 2024. Therefore, the parking capacity, which was deemed problematic in the Travel Survey, will actually be considerably worse than stated for the majority of the year, especially given my comments about the existing student development at 147-149 Gloucester Road.

Unfortunately, the reality is that most occupants of this development (both commercial or residential and those servicing the apartments) are unlikely to use public transport to reach the accommodation, especially if are in residence for more than a couple of weeks and potentially up to 180 days. As it is, there will be a loss of two on-site parking spaces if the redevelopment is approved, although it should be noted that the current commercial occupant's business vehicles already exceed this total, and they have at least two other vehicles parked on Shadwell Road on a daily basis. Presumably in future all four vehicles will be located on Shadwell Road (or the surrounding streets) which are already acknowledged to be at capacity. Even if the occupants of the apart-hotel do not bring cars, as serviced apartments the cleaners will still need to park their car or van to clean and/or remove and replace laundry, potentially multiple times a week depending on turnover days, and there is no capacity for them to park either.

As indicated above, there is already a **highway safety** issue on Shadwell Road both from cars and vans stopping in the road or usually on the double yellow lines to either load or unload or as is more frequently the case just to park for hours. There is infrequent enforcement and even when it does occur, it does not seem to deter regular and persistent offenders. For example, for the last two and a half years, two white transit vans which belong to the owner of Colamdo (a Spanish Deli on Gloucester Road) park on a more or less daily basis on the double yellow lines at the bottom of Shadwell Road or opposite on Gloucester Road with no action being taken or a change in behaviour occurring.

Additionally, Shadwell Road is not an easy road to park on due to the nature of the street, which is narrow and one way. Cars regularly drive too fast for the conditions of the road and exceed the speed limit, causing damage to parked vehicles. Damage to cars is also increasingly common due to inexperienced visitors being unable to park their cars proficiently especially given the narrow conditions. Frequently visitors park close to the junctions at the top and bottom of the road, even if they are causing an obstruction, because they cannot park successfully in any legitimate spaces which might be available. When they do park on the street, cars are frequently parked either sticking out into the road or more commonly across the pavement (in areas with and without the

double yellow lines) which prevents pedestrians, with and without buggies, and wheelchair users from safely walking up and down the pavement, forcing them dangerously into the road instead. I believe the occupants of the proposed developments will experience the same difficulties and simply add to the problem with their own badly parked vehicles.

I should add I do not expect to always be able to park outside my own home, but it would be nice if I could park somewhere on my own street especially when it comes to loading and unloading shopping, etc. When I first moved here, I might have to drive round the block once or twice a year, whereas now it almost every time I return home and multiple times on each occasion, as do other residents, which simply adds to the volume of traffic driving round our narrow streets looking for somewhere to park. Nowadays the parking pressures extend well beyond Shadwell (Wolesley and Raglan) Road(s) up onto Hazelton, Tyne, Broadway, Codrington and Julius Roads, which historically had far fewer cars parked on the roadside, and so frequently it is not even possible to park there instead.

Whatever the applicant's claims, it is inevitable that many users of the proposed properties will travel by car, which they are likely to park on Shadwell (and neighbouring) Roads for long periods of their stay. This will exacerbate the already significant challenges faced by permanent residents, for no benefit. The proposals are therefore in conflict with other parts of paragraph 135(f) of the NPPF which states that developments should not undermine the quality of life.

3. Errors with the Statutory Public Notice Under Article 14 of Application for Planning Permission

I need to also point out that the statutory public on street notification of this development is incorrect, confusing and misleading. Despite being headed "**Application Reference Number S62A/2025/0137**" along with "**Proposed Development at 72-74 Gloucester Road**", the notice goes on to suggest that the rear extension/annexe is to be demolished with 4 terraced houses erected in its place. Please see attached photographs. This is at odds to the information published on the Planning Inspectorate Section 62A portal, where the demolition and redevelopment of 72-74 Gloucester Road proposes to turn the building into 9 serviced apart-hotel.

The statutory notice appears to have amalgamated two separate planning applications in different locations – one at 11-13 Whiteladies Road with the one at 72-74 Gloucester Road – into one notice. Additionally, and maybe as a consequence, the planning reference numbers quoted throughout the remainder of the notice are all over the shop!

For example, it states that "members of the public may inspect copies of the application, the plans, and other documents submitted with it at: <https://www.gov.uk/guidance/section-62a-planning-application-s62a20250134-11-13-whiteladies-road-bristol-bs8-1pb>, i.e. reference number S62A/2025/0134 which ends in 0134, not 0137 as quoted at the top of the notice and on the Planning Inspectorate Online Portal.

Secondly, it goes on to state "and at www.bristol.gov.uk - 25/14937/PINS | 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. 172-74 Gloucester Road Bishopston Bristol BS7 8BH" providing a different reference number again. I appreciate that Bristol City Council is a separate entity to the Planning Inspectorate and will therefore have separate systems and referencing methodologies. The point I wish to make in this regard is that the Bristol City Council web address/hyperlink does not take

you directly the planning portal, so you firstly need to know to search for that part of the website. Additionally, if you are a passerby and search later from home just based on the address and/or postcode of the property, even the advanced search on the BCC planning portal search engine only brings up the original application details from 2023, reference number 23/03351/F, not the 2025 resubmission with the new 25/14937/PINS reference. This is incredibly unhelpful to anyone looking view and potentially object to the development as they will only find the original application details.

Thirdly, at the end of the notice it states "Anyone who wishes to make representations about this application should do so by email to section62anonmajor@planninginspectorate.gov.uk or by writing to Section 62A Applications Team, Planning Inspectorate, 3rd Floor, Temple Quay House, 2 The Square, Temple Quay, Bristol, BS1 GPN, quoting the application site address and reference number S62A/2025/0134", which again is the incorrect reference number for this application which from your portal ends in 0137, not 0134. Will emails or correspondence quoting the reference ending in 0134 (as indicated in the notice) but regarding the development at 72-74 Gloucester Road be correctly identified and reassigned to application ending 0137?

Fourthly, as stated above it says to write to your offices in Bristol whereas online it says to write to your offices in Slough. Which is correct? Will letters of representation sent to alternative offices still be considered?

Lastly, it states in two places on the notice that representation needs to be made by "10 December 2025" whereas online under reference S62A/2025/0137 it states "24 December 2025". I am aware that the 10 December submission date relates to the application at Whiteladies Road, not the one at 72-74 Gloucester Road. People purely seeing the statutory notice displayed on the street will not appreciate this and may see the notice and (not unreasonably) conclude that they have missed their opportunity to object.

Whilst I was aware of the application and have been able to locate it successfully, I am concerned that the notice is misleading to other members of the public/neighbourhood who may have read the notice and either not understood accurately what was being proposed and where, and/or have been unable to locate the application to view and comment on it within the relevant timescales. As it is a number of neighbours on Shadwell Road thought the deadline was today and were unable to complete their objections in time or did their submissions in a rush. I have made sure as many people on the street aware the deadline is 24 December, not the 10th.

For the avoidance of doubt, I have obviously based my objections on the published documentation for S62A/2025/0137 – 72-74 Gloucester Road, BS7 8BF.

To conclude, I urge the Planning Inspectorate to refuse this application, S62A/2025/0137, to protect the established residential amenity and the vitality of the local conservation area and shopping centre. I would welcome a scheme that provides longer-term affordable accommodation suitable for families.

Yours faithfully,

Catherine Dunn

Photo Encs.

Publicity for applications for planning permission
The Town and Country Planning (Section 62A
Applications) (Procedure and Consequential
Amendments) Order 2013

NOTICE UNDER ARTICLE 14 OF APPLICATION FOR PLANNING
PERMISSION

Application reference number **S62A/2025/0137**

Proposed development at **72-74 Gloucester Road, Bishopston, Bristol, BS7 8BF**

Notice is given that Urban Creation (11-13WLR) Ltd is applying to the Secretary of State for Planning permission for Demolition of the rear annexe and delivery of 4 terrace PBSA houses with associated landscaping and other works.

Members of the public may inspect copies of

- the application
- the plans
- and other documents submitted with it

at: <https://www.gov.uk/guidance/section-62a-planning-application-s62a20250134-11-13-whiteladies-road-bristol-bs8-1pb>

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All representations made in connection with the development proposal will be made publicly available on the website. The name of the individual author or organisation will be published however addresses, signatures and contact details will be kept private in line with data protection requirements. We advise you not to include any other personal information about yourself or others.

Sending comments by email will enable the Planning Inspectorate to deal with them more quickly.

Should a hearing be held in relation to the application, and you would wish to make oral representations at the hearing, you must indicate this when making your written representation.

Signed.....Bristol City Council
On behalf of Bristol City Council
Date.....

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Signed... Bristol City Council
On behalf of Bristol City Council
Date

App... Article... 62A... Order 2013
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