

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

Mark Pender <[REDACTED]>

Section 62A Applications Non Major

I write to register my objection to application S62A/2025/0137 for the partial change of use, demolition, and extension at 72–74 Gloucester Road, BS7 8BF. The previous 2023 application attracted over 60 neighbour objections, none of which have been acknowledged or addressed in this resubmission. The applicant has made no material changes, despite extensive community concern.

1. Conflict with the Development Plan: Harm to Residential Amenity and Local Character

The proposal is wholly out of character with the long-established, family-orientated residential streets west of Gloucester Road, including Shadwell Road [REDACTED]. The introduction of nine serviced “apart-hotel” units will significantly intensify transient occupation in an area defined by permanent households and strong community cohesion.

1.1 Inaccurate claims of “need” and misleading evidence

The applicant asserts a “shortfall” in “bespoke visitor accommodation” (Aspect360 Planning Supporting Statement paras 5.5–5.10), yet provides no supporting evidence. This assertion is contradicted by reality:

A simple search identifies 1,000+ AirBnB-type units in Bristol for 1–2 people, including 60+ within the Gloucester Road corridor.

Directly opposite the site, 147–149 Gloucester Road contains 58 bedspaces in 16 units, a development handled by the same planning consultants.

Paragraph 5.29 of the applicant’s statement even refers to “student occupiers”, conflicting with earlier claims of professional and tourist use.

1.2 Overdevelopment

The building cannot reasonably accommodate nine units; this is an intensification for financial return, not a response to local housing needs. The proposal would remove potential longer-term residential accommodation—contrary to BCS18 and BCS20, which emphasise safeguarding and delivering appropriate housing. The Local Plan strongly resists loss of residential capacity for short-term commercial lets.

1.3 Impact on community cohesion

The NPPF states:

Paragraph 9 – decisions must reflect local character, circumstances and the needs of the area.

Paragraph 135(f) – developments should not undermine community cohesion or quality of life.

By introducing a significant transient population in a quiet residential street, the proposal clearly conflicts with both provisions. It would contribute no community benefit and would undermine the settled nature of the area.

1.4 Noise, disturbance, and socio-behavioural impacts

Late-night arrivals, vehicle movements, luggage handling, short-term occupant turnover, and inevitable servicing/cleaning requirements will materially affect neighbouring amenity. These impacts exceed those associated with residential use and are inappropriate in this location, which is not analogous to the city centre, hospitals, business districts or major transport hubs.

2. Highways, Parking, and Safety – Serious Deficiencies

The applicant's "car-free" claim is unrealistic in this specific location. The proposal will worsen an already severe parking and safety problem.

2.1 Severe and existing parking stress

Shadwell Road is often completely full, with widespread illegal parking on double yellow lines, on pavements, and at junctions. Gloucester Road businesses depend on the short-stay parking turnover created when residents leave for work—a dynamic that is already at capacity. The proposal will remove two on-site spaces, and commercial vehicles currently using the site already spill onto the road.

2.2 Anticipated vehicle generation

Even if some guests do not bring cars, turnover, cleaners, laundry services, maintenance vans, and staff will generate a significant increase in vehicular activity, with no realistic place to park safely. The development could indirectly generate 9–18 additional vehicles, all competing for already saturated kerb space.

2.3 Transport Statement factual correction

In their Transport Statement (Technical Report 29648/1A, August 2024, Planning Inspectorate’s case page for S62A/2025/0137) the applicant states:

Nearby bus stops have shelters and RTI displays – this is incorrect for southbound travel.

Parking surveys were undertaken on 18, 19, 21 and 22 June 2024 (daytime) and night surveys including 18 June 2022 and 21 June 2024, and asserts the surveys are “representative” and “within ... University term time” - this is incorrect. The published academic calendar for the University of the West of England shows teaching/assessment activity ended on 24 May 2024 and the University of Bristol’s ended on 7 June 2024. As both universities had finished teaching by the June parking survey dates, they significantly under-represent typical parking pressure in this area for the majority of the year.

The Transport Statement also reproduces Bristol City Council Highways’ consultation comments, which raise unresolved concerns regarding footway safety improvements (including Section 278 works), pedestrian visibility, cycle storage access, and refuse/waste collection arrangements. Taken together, these factors further weaken the applicant’s claim that the development can operate acceptably as “car-free” and reinforce the point that local parking, servicing and highway conditions are already at or beyond capacity.

These inaccuracies materially undermine the credibility of the Transport Statement.

2.4 Safety risks

Shadwell Road is narrow, one-way, and experiences speeding and frequent vehicle damage. Increased short-term visitor traffic—by drivers unfamiliar with the street—will worsen risk, including:

Hazardous junction visibility at Shadwell Road / Gloucester Road

Drivers inexperienced in parking in the conditions on Shadwell Road, causing damage and obstructions, including on pavements and junctions (with and without double yellow lines) forcing pedestrians and wheelchair users into the road

Additional circulation as vehicles search repeatedly for parking

The proposal therefore conflicts with DM23 (Transport Development Management) and with the NPPF requirement that development must be safe and suitable for all users.

3. Additional Relevant Policy Conflicts

Additionally, there is:

3.1 Failure to demonstrate compliance with DM14 and DM15 (Residential Amenity & Environmental Effects)

The applicant does not demonstrate:

Acceptable internal living space and compliance with minimum amenity standards

Compliance with outlook, privacy, or daylight guidance

Adequate noise mitigation for neighbouring properties

3.2 Conflict with Policy BCS21 (Quality Urban Design)

The design and intensity of use fail to respect:

“Local character and distinctiveness”

The transition from commercial frontage to family residential side streets

3.3 No evidence of sustainable servicing arrangements

The proposal offers no clear plan for:

Laundry collection

Waste and recycling

Turnover-day servicing

Delivery/collection logistics

All of these will necessarily occur in Shadwell Road, not Gloucester Road, causing further obstruction and noise.

3.4 Loss of potential long-term housing

In a city with an acute housing shortage and severe affordable housing pressures, converting a site suitable for family accommodation to short-term commercial lets conflicts with the strategic objectives of BCS18 (Housing Type) and the aims of national housing policies encouraging delivery of stable residential accommodation.

4. Fire Safety, Access & Emergency Service Provision

This is especially relevant because:

- The proposal significantly intensifies occupancy (from 1 commercial unit → 9 units) on a constrained site accessible only via narrow, heavily parked residential roads.
- Shadwell Road frequently experiences illegal parking and obstructions, often preventing vans — let alone emergency appliances — from manoeuvring safely.
- The proposed rear extension reduces the ability to provide alternative egress routes or rear access for emergency personnel.

The NPPF requires developments to provide safe and suitable access for all users, including emergency services, and Bristol's Local Plan policies on residential safety and design quality (including BCS21) are relevant. The application fails to demonstrate that a building with up to nine short-stay units can be safely accessed by fire appliances or that safe evacuation can be achieved during peak parking saturation.

5. Waste Storage, Servicing & Collection Logistics, & Odour Control

Serviced apartments generate significantly more waste than standard residential units due to high turnover and cleaning operations. The application provides no evidence that storage volumes meet Bristol City Council/Bristol Waste standards for nine serviced units, nor does it show how refuse or recycling will be safely transported to collection points without blocking the highway. Collection vehicles already struggle to access Shadwell Road due to persistent pavement parking and narrow street geometry. The absence of a credible waste-management plan conflicts with DM14 and DM32, which require adequate storage, servicing logistics, and protection of neighbouring amenity.

6. Internal Space Standards, Layout & Residential Quality - Failure to Demonstrate Compliance with Nationally Described Space Standards (NDSS)

Although Bristol has not fully adopted the Nationally Described Space Standards (NDSS) citywide, these standards are widely used by planning inspectors as a benchmark for adequate living conditions. The applicant repeatedly refers to the scheme as “residential accommodation” yet provides no evidence that the proposed nine units meet minimum space requirements, adequate daylighting, privacy, or suitable outlook. The cramped layout and intensity of development strongly suggest that several units would fall below national benchmarks. This represents poor-quality internal amenity and conflicts with DM14, DM15, and BCS21, all of which require high-quality, healthy living conditions for future occupiers.

7. Serious Errors with the Statutory Public Notice

The statutory Article 14 notice displayed on the street is incorrect, misleading, and conflates two separate applications (11–13 Whiteladies Road and 72–74 Gloucester Road). The published Article 14 notice for this application is therefore incorrect, confusing and misleading. These errors specifically include:

Wrong development description (reference to the demolition of a rear annexe and erection of four terraced houses)

Incorrect URL directing the public to the Whiteladies Road application

Wrong reference numbers quoted for representation (0134 instead of 0137)

Conflicting submission deadlines (10 December vs. 24 December)

Conflicting postal addresses (Bristol vs. Slough offices)

These errors risked preventing residents from finding the correct application or believing they had missed the deadline. This compromises the integrity of public consultation, undermining the fairness and legality of public consultation, which is contrary to Article 15 requirements and the principles of fairness in decision-making.

Conclusion

This development is:

Overdevelopment

Out of character within the established community,

Unsubstantiated by evidence

Relies on incorrect and misleading evidence

Harmful to residential amenity,

Unsafe in highways terms, and worsens already unsafe highway and parking conditions

Procedurally compromised by a fundamentally incorrect statutory notice.

Contrary to the Development Plan, the NPPF, and multiple material considerations

Raises significant concerns regarding fire access, waste management, and internal residential quality of accommodation

I therefore urge the Planning Inspectorate to REFUSE application S62A/2025/0137. A smaller scheme providing longer-term accommodation for families would be far more appropriate for this site.

Yours faithfully,

Mark Pender

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