

Section 62A Applications Team
The Planning Inspectorate
3rd Floor
Temple Quay House
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Temple Quay
Bristol
BS1 6PN

Our ref: PR002911
Date: 22nd December 2025

Sent via e-mail

Dear Sir/Madam,

Town and Country Planning Act 1990

265-267 Church Road, Bristol BS5 9HU

Erection of a second floor roof extension, demolition and rebuilding of a single storey rear extension, and change of use of upper floors and part of ground floor from ancillary commercial space to a large 8-bed HMO. New shopfront to retained ground floor commercial unit at 265, and infilling of shopfront to 267.

I write on behalf of my client, McGowan Hayes Property Ltd, to apply for the redevelopment of the above site, to create an 8-bed large house in multiple occupation, with 1 no. commercial unit retained at ground floor level. The applicant has chosen to take the Section 62A route and submit the proposal directly to the Planning Inspectorate. Notice of this intention was given on the 7th December 2025. I attach the following documents as part of this application:

- Application forms and certificates;
- Drawing no. 4480.PL.01 – site location plan;
- Drawing no. 4480.PL.02 - existing and proposed site plans;
- Drawing no. 4480.PL.03 – existing floor plans;
- Drawing no. 4480.PL.04 – existing elevations;
- Drawing no. 4480.PL.05 Rev B – proposed floor plans;

- Drawing no. 4480.PL.06 – proposed elevations;
- Coal mining risk assessment;
- Energy statement;
- BNG exemption statement.

Site and planning history

The site comprises a mid-terraced, double unit on Church Road, with retail and workshop areas at ground floor level, office and ancillary storage at first floor level, and a rear garden with further external storage. The left-hand side of the unit is recessed, with a single-storey lean-to structure to the ground floor. The right-hand side of the unit is dressed in stone and fronts the pavement. The terrace comprises 7 units fronting Church Road with ground floor Class E uses, and with the exception of 263 (which comprises 2no. self-contained flats), and 257 (on the corner of Roseberry Park, where the return frontage was rebuilt to provide 9no. flats in 2005, ref 05/04479/F) the upper floors are in ancillary usage. There is an Aldi superstore immediately to the east of 269 Church Road.



Application site and adjoining properties

The site is part of the primary shopping area within the Church Road/St George town centre, within Flood Zones 1, is not in a conservation area, there are no Tree Preservation Orders on the site, and the building is not listed.

There are outbound and inbound bus stops within a short distance (10-50 metres) to the east on Church Road, with 13 services per hour towards the city centre, and through to Bishopsworth and Avonmouth, and the same number of service per hour operating out towards the eastern fringes of the city, and through to Kingswood, Warmley and Cadbury Heath. The site falls within the Church Road/St George designated town centre and primary shopping area, and has easy access to a wide range of services and facilities. St George Park (designated Important Open Space and Local Historic Park) lies 140 metres to the east.

A Section 62A application (ref: S62A/2025/0091) was refused 23rd June 2025 on two grounds; inadequate ventilation to the refuse storage, and inconvenient cycle storage. This current proposal seeks to overcome those two reasons for refusal.

Otherwise, there is no relevant planning history for the site, though historic mapping suggests that 265 has been reconfigured at some point, and the timber lean-to structure is self-evidently not original; however Google Street View imagery shows it in situ in September 2008, thereby confirming its lawfulness.

Proposal

My client proposes the change of use of the upper floor, and the rear of the ground floor, to a large, 8-bed house in multiple occupation. To facilitate the change of use, it is proposed to demolish and rebuild the existing rear extension, and to erect a second floor roof extension behind the existing parapet wall. The ground floor Class E unit to 265 would be renovated and retained, and a new shopfront installed following the demolition of the lean-to. The retail floorspace to 267 would be repurposed as a bedroom, and the shopfront infilled with matching stone and new fenestration.

Planning analysis

As noted above, the site has been the subject of a recent Section 62A planning application, and this current application seeks to overcome the reasons for refusing that application (refuse and cycling storage). The cycle storage will now be located internally (rather than in the rear garden),

and the refuse store for the retail unit repositioned to the front of the building, with a louvred door proposed.

Matters of the principle of housing, reduction in commercial space, housing mix, design, residential amenity, neighbour amenity, sustainability, climate change, parking provision and biodiversity net gain (the site would meet the de minimis exemption) were assessed previously and found to be acceptable. The revisions to the current proposal raise no new issues that would warrant a different outcome, and therefore the remainder of this letter will address the three reasons for refusal.

Reason for refusal 1

The first reason for refusal related to the failure to provide ventilation to the waste store, which was to be located internally. This has now been relocated to the front of the building, with a louvred door provided. The design impacts of this change would be limited and acceptable; the louvred door would sit to the left of the shopfront window, and the entrance door to the right, with fanlights above both, providing a good degree of symmetry.

Reason for refusal 2

The second reason for refusal related to the siting of the cycle store to the rear garden, requiring occupiers to wheel bikes through a narrow corridor, and serving as a deterrent to cycling.

Initially, the cycle storage was proposed within the building. In its initial response to the proposal, the LPA's Transport Development Management Team raised no issues with the location of, or access to, the cycle store, but objected to the spacing between Sheffield stands and requested revised plans.

In order to address the issues raised in respect of design and active street frontage, the front of 267 was changed from a bin store to a bedroom, and the cycle store repositioned to the back garden. The Inspector found this to be inconvenient and impractical.

The current scheme proposes to relocate the cycle store back within the building. A two-tier hydraulic stacker system is now proposed, for 8 bikes. The plans confirm a minimum aisle width of 1300mm, clear access space in front of rack of 1300mm, spacing between racks of 375mm, a centre of rack leg to wall tolerance of 300mm, and a minimum ceiling height of 2700mm.

The Bristol Transport Development Management Guide-Cycle parking (2022) states that stacker unit can be used to save space, and to make up any shortfall of cycle parking provision over and above the accessible provision. The accessible provision for residential uses is one stand per unit. As the current proposal is for a single dwellinghouse (whilst an HMO, it is a single dwellinghouse nevertheless), an accessible Sheffield loop is proposed beneath the stairs (for one bike), with a minimum head clearance of 2 metres.

The guidance states that cycle parking should be provided near to or at the main entrance to the building to allow convenient access, and that for an individual dwelling, a minimum access width of 1.2m is required to allow for bicycles to be pushed to storage areas, whereas for communal cycle parking provision, a minimum straight corridor width of 2m is required.

The previous Inspector classed the cycle storage as communal, therefore requiring a 2-metre width. As noted above however, the proposal is for a single dwelling, and the applicant therefore considers the required width to be 1.2 metres.

The cycle store would be sited within 11 metres of the entrance, down a straight corridor, with no steps and a minimum width of 1.25 metres. Push button automatic doors are proposed to the cycle store, for ease of access.

It is acknowledged that the guidance (which, for the avoidance of doubt has not been formally adopted, and the LPA's website clarifies that it does not constitute a formal design code) states that cycle parking should be kept separate from waste storage, as these areas may be unpleasant areas to use, and may not be conducive to attractive cycle parking provision.

Within the area, there is a good degree of separation between the cycle storage and refuse storage, which would be ventilated by a window. The management company would ensure that the area is kept clean, and as such it would not be an unattractive or unpleasant area to use, in the context of this being a single dwellinghouse.

Planning balance and conclusion

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%.

With §11d of the NPPF thus engaged, the proposal offers: social benefits through the provision of additional housing in a sustainable location, in accordance with BCS1; economic benefits through construction jobs and increased spending in the locality; and environmental benefits through the more efficient use of land to provide increased accommodation, and the provision of an energy-efficient property. It is not considered that there are any harmful impacts that would outweigh these benefits.

This letter outlines how the current proposal has addressed the previous reasons for refusal, and raises no new issues that would justify refusal. For these reasons, the application should be supported.

The fee will be paid on request. If you have any further queries, then please do not hesitate to contact me.

Yours faithfully,

Stokes Morgan Planning Ltd