

1. INTRODUCTION

These comments are submitted on behalf of Penlane Ltd. ('the applicant'), in response to the Statement of Case (SOC) submitted by Bristol City Council (BCC) in respect of Section 62A Application Ref. 25/15450/PINS (PINS Ref. S62A/2025/0144), for No. 115 Hampton Road, Bristol, BS6 6JG ('the application site').

2. BCC STATEMENT OF CASE (SOC) (undated)

The comments refer to the corresponding issues in the BCC SOC:

Introduction (Page 1)

- 2.1 The suggested reasons for refusal (paragraphs 1-3) are refuted for the various reasons given below.

Principle of Development (Pages 2-3)

- 2.2 Paragraph 3 (Page 2) suggests that 'a business of this type is far more suited to a location within a centre such as Whiteladies Road or Chandos Road, where there are many units that are more suited to the style of business'. This is refuted - Penlane Ltd. simply requires a modest, convenient office/maintenance base from which to undertake administration, store tools and serve as a welfare base (for up to 5 personnel). It does not require a commercial unit of any significant size, or a town/local centre presence for footfall purposes. Therefore the converted garage is **exactly** suited to this type of business. Furthermore, a land use survey of the Whiteladies Road and Chandos Road centres (November 2025) submitted with the application, confirms that there are no vacant units of comparable size or of a proportionately affordable rent to be suitable/realistic for occupation by Penlane Ltd (and no vacant units available at all within Chandos Road centre). Of note, BCC does not support its assertion of '**many**' units being available, with any evidence.
- 2.3 Paragraph 4 (Page 2) suggests that Policy DM7 only permits town centre uses outside of centres where they provide for the needs of a local community. The policy wording actually states 'local needs', and arguably this encompasses local businesses such as Penlane Ltd - it is a property management company which owns/lets a number of residential properties throughout the Clifton and Redland areas, and **needs** an office/maintenance base within the locality.
- 2.4 Paragraph 4 (Page 2) suggests that 'there has been no evidence to suggest that there are no suitable sites available for the proposal within either Whiteladies Road or Chandos Road centres, and therefore the proposed location outside of these centres cannot be supported'. The application is supported by a Land Use Survey of both centres, undertaken in November 2025. Therefore robust and up-to-date evidence **has** been provided demonstrating that there are no suitable sites within these centres. Of note, BCC has not provided any evidence to the contrary.
- 2.5 Paragraph 4 (Page 2) suggests that without the above evidence, it cannot be determined that the proposal would not hinder the vitality, viability or diversity of the Whiteladies Road and Chandos Road centres. The submitted Land Use survey confirms that, as of November 2025, both the Whiteladies Road and Chandos Road centres enjoy very high occupancy rates, dominated by shops, cafes and bars (of the 300 identified units/properties within the Whiteladies Road Town Centre, there were only 10 vacant or available for let, whilst of the 28 units/properties identified within the Chandos Road Local Centre, there

were none vacant or available for let). Therefore, given the very modest scale/nature of the proposals (just 20m²), the office/maintenance base would make **negligible** positive contribution to the vitality, viability or diversity of these centres. Similarly, the siting of the office/maintenance base in Auburn Road would not attract footfall away from either centre or result in any dispersal of their retail function, so on this basis would not result in any significant adverse impacts on their vitality, viability or diversity. In short, from the Land Use Survey evidence submitted, it is possible to determine the (**negligible**) impact on these nearby designated centres.

Design and the Whiteladies Road Conservation Area (Page 3)

- 2.6 It is noted that BCC considers that ‘the proposed changes in design to the existing garage would bring about improvements that would improve the outlook of the dwelling and enhance the surrounding Conservation Area’, and would therefore be acceptable on grounds of design and heritage.

Transport and Highways (Pages 3-5)

- 2.7 Paragraph 1 (Page 4) suggests that a threshold space of 0.7m between the access door to the garage and the carriageway of Auburn Road is not sufficient for pedestrians to provide safe and usable access to the site. Of note, no reference is made to any BCC/other Design Standard against which such a threshold distance has been/should be assessed, and BCC accepted this 0.7m threshold distance for the existing garage in 2002 (Ref. 02/00798/F). It is proposed to retain this permitted 0.7m threshold distance, not reduce it.

Further to this, the majority of the Hampton Road dwellings feature a rear garage or off-street drive with similar threshold distances to Auburn Road, and analysis of Personal Injury Collision data (January 2014 to December 2023), as included in the submitted Transport Statement (Ref. HTP/25178/TS/0, December 2025), confirms that there have been no collisions recorded on Auburn Road during the study period. It is therefore concluded that there are no existing road safety problems on Auburn Road, based on 0.7m/similar threshold distances. BCC has submitted no evidence to the contrary.

On this basis, it is contended that the retention of the existing 0.7m wide threshold will continue to provide safe and suitable pedestrian access to the application site, as it has done, and continues to, provide safe and suitable pedestrian access to the adjacent off-street parking areas and adjacent garages. Notwithstanding this, the proposals include new inward-opening garage doors, so actually offer an improvement on the current permitted situation.

- 2.8 Paragraph 2 (Page 4) states that the proposals would create a ‘primary’ access onto the eastern side of Auburn Road, and considers that the proposed office/maintenance base would generate a greater number of trips than the existing ‘auxiliary’ accesses here (serving other domestic garages/driveways). This is refuted – the scale of the proposals is such that the proposed office/maintenance base will be visited by no more than 1-3 personnel in any one day. Thus as a ‘primary’ access, it will likely create **no** greater pedestrian movements than might be associated with the use of a domestic ‘auxiliary’ access.
- 2.9 Paragraph 3 (Page 4) asserts that a wheelchair users would require a minimum of 1.2m threshold space in order to access and egress the site, and that the proposal would therefore fail to provide sufficient inclusive access. As set out in the submitted Transport Statement, Auburn Road is of an historic design, with no provision of a footway on its eastern side. BCC has not provided any evidence to verify that the existing approved 0.7m wide threshold precludes access to garages/off-street car parking areas for users

of wheelchairs or mobility scooters. Furthermore, BCC did not raise the issue of access for wheelchair uses in its pre-application advice (Ref. 25/12819/PRE), or in respect of previously approved applications for garage conversions in Auburn Road (Refs. 14/00567/H 21/06923/H, details in Transport Statement).

- 2.10 It is noted that Paragraph 4 (Page 4) confirms that the conversion of the garage/loss of one off-street parking space would have a negligible impact on existing on-street parking capacity.
- 2.11 It is noted that Paragraph 4 (Page 4) confirms that no cycle parking is required with the proposed office/maintenance base, and that the retention of cycle parking for No. 115 Hampton Road is acceptable.

Amenity (Page 6)

- 2.12 Paragraph 2 (Page 6) states that 'given the shape of building would stay the same as currently is, the potential impact on the amenity of neighbouring dwellings would be insignificant' but that there are 'concerns regarding noise and disturbance associated with commercial premises given the close proximity to the surrounding dwellings'. Such concerns are considered unsubstantiated and disproportionate in this instance, as usage of the proposed office/maintenance base will be very modest, limited to 1-3 personnel per day, 3-4 days per week, Monday-Friday 0745 - 1600 hours, with no construction activities taking place in the building. Furthermore, a Management Plan covering these matters can be adequately enforced by a planning condition, and as such the proposed use would be more tightly controlled than the current unrestricted domestic use of the garage (or of any other garage/outbuilding along Auburn Road).

As set out in the Planning Statement, the applicant would be prepared to accept a temporary permission in this instance, to allow BCC the opportunity to review any (unlikely) amenity impacts with the proposals at a future date.

It is noted that BCC Pollution Control officer has not submitted any objections to the proposals.

- 2.13 Paragraph 4 (Page 6) refers to the loss of a parking space and the need for any vehicle user to park elsewhere and potentially cause additional strain on nearby streets. All Penlane Ltd visits to the office will be by vehicles with a local parking permit, and all maintenance staff already park in the neighbouring vicinity (thus there will be no increased pressure on local parking capacity). On the exceptional occasion that materials/equipment need to be deposited/collected from the building, this will take place briefly from Auburn Road - no different from any regular domestic grocery/parcel deliveries.
- 2.14 Paragraph 4 (Page 6) suggests that the conversion of the garage to an office would result in the loss of a vehicle parking space and a significant level of storage space for the dwelling (115 Hampton Road), which would have a harmful impact on neighbouring amenity. This is refuted - the existing garage has not been used for parking for some time, due to its substandard size (permitted under Application Ref. 02/00798/F, but not compliant with BCC current space standards). Furthermore, the existing cycle store for No. 115 will be retained (and slightly enlarged) within the building, such that only 16.1m² of storage space will be given over to the office/maintenance base. This is relatively modest (proportionate to the size of the dwelling and its curtilage), and is not considered '**significant**' to the extent of being harmful to amenity.

3.0 THIRD PARTY COMMENTS

It is noted that no objections have been submitted by any third party consultees to the proposals (34 neighbouring addresses consulted).

4.0 SUGGESTED CONDITIONS

The applicant is agreeable to the suggested conditions list contained in Section 4 (Pages No.'s 6-8).

5.0 SUMMARY

The applicant maintains that Application Ref. 25/15450/PINS should be approved, on the basis that:

- The proposals are for a **very** modest quantum of office space, of a proportionate scale and intensity to the edge-of-centre location, which will provide for a local business need. They are supported by robust and up-to-date evidence to demonstrate that there are no suitable available sites within nearby designated centres for this use, and to determine that they will not result in significant adverse impacts to the vitality, viability or diversity of these centres;
- The proposals involve sensitive alterations to the existing building that enhance the character of the Whiteladies Road Conservation Area;
- The proposals replicate (actually improve) the access arrangements of the existing domestic garage (accepted by BCC under Application Ref. 02/00798/F) and will not result in any adverse impacts on the local highway network, highway safety or parking capacity;
- The proposals involve very modest usage of the building for office purposes, which will not adversely impact on the residential amenities of neighbouring occupiers, and can be adequately controlled by an enforceable Management Plan;
- The proposals involve relatively minimal loss of domestic storage space, which would not adversely impact on the residential amenities of the existing dwelling; and,
- The proposals accord with the adopted BCC Core Strategy and Development Management Plan documents, the NPPF and Supplementary planning guidance, and there are no material considerations which indicate the permission should be refused. We therefore respectfully request that this application be approved.