



PINS ref: S62A/2025/0150

Bristol City Council ref: 25/10006/PINS

Description of Proposed Development:

Application for Planning permission for 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 shopfronts to retained ground floor commercial units.

Address: 265 - 267 Church Road, Redfield, Bristol, BS5 9HU

Local Planning Authority (LPA) Assessment and Statement

11th March 2026

COMMENT ON APPLICATION PROCEDURE

It is the LPA's view that this application can be determined via written representations given the matters for consideration and the level of public representation as set out in this statement.

SITE DESCRIPTION

As set out in the Appellant's submitted cover letter:

"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 LPA's records indicate that Church Road is an adopted highway (the A420) subject to a traffic management scheme for the Showcase Bus Corridor. The site is within an identified Coal Authority High Risk Area. The site is within the Primary Shopping Area of the St George (Church Road) Town Centre.

PROPOSED DEVELOPMENT

The Appellant's submitted cover letter sets out that the application 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 refuse, recycling and cycle storage, and the shopfront infilled with matching stone and new fenestration."

RELEVANT PLANNING HISTORY

25/11000/PINS- A similar Section 62A application (ref: S62A/2025/0091) for 'Application for Planning permission for 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 a 8-bed HMO. New shopfronts to retained ground floor commercial units' was refused 23rd June 2025 on two grounds (summarised):

- Inadequate ventilation to the refuse storage. Without the provision of appropriate waste storage, the commercial unit would not have a reasonable prospect of being viable. Consequently, the proposal would result in harm to the vitality and viability of the Town Centre.
- The proposed cycle storage would require occupiers to wheel bicycles through a narrow corridor through the property. This inconvenient and impractical arrangement would deter occupiers from the use of the bike store. The proposal would therefore fail to provide adequate secure facilities to encourage travel by sustainable means.

73/03967/U_U- Single storey extension to rear of existing works to provide storage area. REFUSED 07.09.1973 on the following grounds:

1. The proposal represents an over-intensive use of the site
2. The application, if approved, would lead to the expansion and consolidation of a non-conforming use in an area zoned for residential purpose;
3. The increased storage facilities would involve additional loading and unloading on a busy highway with resultant congestion and traffic danger.

RESPONSE TO PUBLICITY AND CONSULTATION

The application was publicised via neighbour letters with a deadline date of 24.02.25.

The neighbour notification list is supplied to the Inspectorate in addition to a copy of the letter.

One comment has been received to the application and is available on the Planning Inspectorate website. This comment seeks clarification of bin store access:

"Please can the access to the bin store be clarified. It looks from the plans that the bin store for the

commercial unit is street facing, however the bin storage for the HMO bedroom units looks to be in the middle of the building in with the bike storage. I would be interested to know how this would be accessed for waste management, and whether these bins will be brought out onto the street for collection and wheeled back through the building? If so, this proposed HMO is on a busy road with a narrow pavement which does not currently have the space for bins to be wheeled out and back in again and stored overnight/each week, especially as this is a busy part of the street by the bus stops, and is already too narrow for wheelchairs and pushchairs etc. I live around the corner and can't see how this would work, or how this would be convenient and hygienic for the inhabitants!"

CONSULTEES

The Council's Private Housing Team confirmed in relation to previous application (LPA ref. 25/11000/PINS) that the proposed communal living space provision and bedroom sizes met the Licensing Standards.

The Transport Development Management Team commented in relation to the current application that they would support a recommendation for refusal - If the inspector is minded to grant the application planning permission, then conditions would be recommended and are listed. **A full copy of their comment is provided alongside this statement and uploaded to the Planning Portal.**

The Urban Design Officer has not commented on the current application but made the following comments in relation to the previous application (LPA ref. 25/11000/PINS) as follows: 'Objection' from Urban Design.

"The submission has not enough information to give the LPA confidence the conversion of these two properties, including a new roof extension, will deliver a scheme of quality in its urban context.

Urban elevations and sections are required. There is incongruence on elevations and floor plans.

Assessment

To the building front along Church Road

The main design concept here should be 'repairing the frontage'.

- a) If there is not attempt of bringing forward the façade of the recessed existing first floor (No.265), the lower ground floor on this part of the elevation should offer a positive and attractive retail space. It should be an upgraded and integrated addition, considering the proportions of facias of adjacent buildings. This has not been considered.



- b) Locating the bin store at the existing retail frontage (No.267) seems a missed opportunity.
An elevation in context has not been submitted.



Massing

- c) To assess the impact or otherwise of the proposed pitch roof space towards the rear, there are no sections to demonstrate.

Layout

- d) To the arrangement of the distribution of bedspaces within the two properties, there is a serious concern. Seeing the elevations, the discrepancy between the lintels of both properties only infers the floors levels are different. There are no sections to illustrate.

Liveability

- e) The internal circulation, in addition of being narrow, has no natural light and ventilation.”

The Pollution Control Officer commented in relation to the current application summarised as follows:

‘These premises are on the busy Church Road, adjoin a fish and chip shop and an Aldi Supermarket close by. I therefore have concerns with regards to noise from traffic and ventilation, refrigeration or air conditioning plant associated with neighbouring commercial premises. I am also concerned about odour from any extraction flue at the neighbouring fish and chip shop potentially affecting the residents of the proposed residential accommodation. I would therefore ideally like to see further information provided in the application with regards to the above noise & odour sources and any necessary mitigation I would have to object to this application. If however you are minded to grant the application I would ask that the stated conditions are attached.’ **A full copy of their comment is provided alongside this statement and uploaded to the Planning Portal.**

The Pollution Control Officer commented as follows (summarised) in relation to previous application (LPA ref. 25/11000/PINS), which provides additional detailed consideration of layout matters.

'The intensification of everyday living noises, particularly in common areas like kitchens and living rooms, is a material planning consideration. Improvements to the sound insulation of a property can help reduce the noise transmitted to neighbouring properties.

In this case, the neighbouring property at 269 is a dental surgery on both floors, so there is no concern about noise transmission given the use.

The proposed communal kitchen/ living room is on the ground floor adjoining the fish and chip shop at 263 so there would be no concerns about noise in that respect. The only part adjoining other residential is the first floor next to 263- this is proposed to be 2 HMO bedrooms, one with an ensuite bathroom on the party wall. This would be similar to the use of the first floors of other neighbouring properties for residential use and would not represent a significant intensification of residential use.

A Noise Sensitive Premises Assessment is required to determine the impact of road traffic noise, neighbouring uses and neighbouring plant equipment on future residents via condition. An assessment of the ventilation system at the adjoining property is required to establish any impact on future residents in terms of odour, which may require mitigation. This would also be sought via condition.'

The Mining Remediation Authority (formerly the Coal Authority) were consulted on the current application, and their written representation is available on the Planning Inspectorate website- they commented 'Material Consideration- No objection' in relation to the proposal.

KEY PLANNING CONSIDERATIONS

In relation to the previous reasons for refusal of the application, the Local Planning Authority (LPA) comments as follows:

1. Ventilation of waste storage and consequent implication for commercial unit viability

The current application proposal includes a commercial waste store to the front of the commercial unit accessed only from Church Road measuring approximately 1.25 x 1.6m by the LPA's measurements, which it appears could accommodate several 120L wheelie bins. The elevations appear to indicate that the space would be as high as the entrance door but details are not given. A louvred door is proposed giving ventilation to the space, though it is noted that this does provide a cramped and utilitarian appearance to the shopfront, reducing the area of shop window. Overall though the shopfront would have a symmetrical composition.

There would be some risk that this arrangement would be awkward to use and that wheelie bins could be left on the pavement, which is narrow in this location and would be unacceptable.

The Council's Transport Development Management (TDM) Team has advised that the access door to the commercial waste store opens outward onto the adopted highway. Access doors should not open directly outwards onto the adopted highway as they can become an obstruction to pedestrians in accordance with Section 153 of the Highways Act 1980.

The residential circulation spaces within the property have no natural light and are narrow. The residential refuse store is accessed off a main residential corridor, also serving the main living room at ground floor. While presumably this would be ventilated to the exterior, no details are given and

the proposed elevations show standard casement windows- the cover letter states the space would be ventilated by a window. Even with ventilation, this close relationship between refuse store and living accommodation would be expected to have an unpleasant and unhealthy effect on the living environment of future occupiers in terms of odour/ vermin. It is flagged whether the applicant has confirmed that this would receive Building Regulations approval, though noting that this matter is outside the planning process. It is also unclear whether the proposal has addressed the LPA's previous concerns about providing the correct amount of waste/ recycling storage space, if anything the space appears to be smaller and combined with cycle storage. There is a risk of refuse/ recycling containers being left permanently on the pavement as a result of the above issues.

2. Cycle storage

Reason for refusal:- 'The proposed cycle storage would require occupiers to wheel bicycles through a narrow corridor through the property. This inconvenient and impractical arrangement would deter occupiers from the use of the bike store. The proposal would therefore fail to provide adequate secure facilities to encourage travel by sustainable means.'

The previous proposal was for cycle storage to the rear of the property. The current proposal incorporates cycle storage internally within the property. This would require users to wheel cycles down a corridor 13m to the entrance door along a corridor measuring approximately 1.2m in width along its length. This reduces the distance previously proposed from the backdoor by about 5m.

The cycle storage proposed is partly in two-tiered racks, which is not suitable for all users for reasons of accessibility, though some Sheffield Stands are also proposed internally adjacent to the stairs.

The Council's TDM Team comments as follows in this regard:

'The applicant has proposed a total of nine cycle parking spaces including a two-tier cycle rack (stacker unit) for 8 cycles and a Sheffield stand for 1 cycle located within the building.

The two-tier cycle rack is located within the same area as the proposed waste store. Cycle parking should be kept separate from waste storage and should not have to be accessed via waste storage areas. These are unpleasant areas to use and are not conducive to attractive cycle parking provision. There is also a risk that spills of refuse can cause damage, particularly to tyres.

Two tier cycle racks are considered to be less accessible than Sheffield stands as these require residents to lift their cycles into the mechanism and then push the mechanism into the unit. Due to this these units require more upper body strength to use. Additionally, these units require additional space to use and manoeuvre cycles into and out of, this would be hindered by the presence of residential waste bins.

The Sheffield stand is located underneath the staircase on the ground floor. The dimensions of the space are acceptable for one cycle.

The lack of separation between the storage of cycles and the storage of waste containers and the use of a two-tier cycle rack would therefore be detrimental to the propensity of future occupiers to use the cycle store and to travel by sustainable means, contrary to policies BCS10 and DM23 of Bristol's Local Plan.'

The Council's Transport Development Management Team has flagged up however that the proposed refuse and cycle stores are insufficient and seek a condition to address this. Specifically, the correct number of cycle parking spaces are provided but the size of the store would be insufficient.

Other matters

Sustainability

A Sustainability Statement has been submitted with the application, which sets out that an air source heat pump (ASHP) would be a feasible heating option for the proposal as well as solar panels, which due to orientation would need to be situated on the proposed new front roof slope of the building and would therefore have a visual impact. An ASHP has been selected and would achieve a reduction in carbon dioxide emissions beyond the residual level by 44.8%, which would be policy compliant. Details would be needed of the siting of the ASHP units and internal requirements to check feasibility and noise levels of equipment.

Residential amenity (noise and odour)- recommended dealt with via condition.

Biodiversity- The applicant has submitted a Biodiversity Net Gain Exemption Statement. No reference is made to the rear garden area.

Community infrastructure levy

Refer to separate email supplied to PINS from Jim Cliffe (CIL and Planning Obligations Manager) regarding CIL liability dated 02/01/26.

Conditions

If the Inspector is minded to approve the proposed development, the following conditions would be recommended:

- Noise Sensitive Premises Assessment
- Details of extraction and ventilation system
- Materials: Stonework repair to Church Road frontage- sample panels
- Refuse storage: residential and retail- amendments to increase space provision and details of ventilation.
- Cycle storage: residential- amendment to ensure suitably sized provision
- Sustainability Statement compliance
- ASHP siting and details (including noise levels)
- Noise from plant equipment restriction
- Construction Management Plan (taking into account that the site's location on a major A-road and extremely busy bus route)

Recommended conditions

Time limit

Full Planning Permission

The development hereby permitted shall begin before the expiration of three years from the date of this permission.

Reason: As required by Section 91 of the Town and Country Planning Act 1990, as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

Noise Sensitive Premises Assessment

No development hereby permitted shall take place until an acoustic report on the existing noise climate at the development site has been submitted to and approved in writing by the Council. The report shall show that the dwellings hereby permitted will be provided with suitable sound insulation and ventilation with regard to noise from the following: -

- Noise from road traffic
- Noise from adjoining uses
- Noise from ventilation, refrigeration and air conditioning plant at nearby commercial premises

The noise assessment shall be carried out by a suitably qualified acoustic consultant/engineer and shall take into account the provisions of BS 4142:2014+A1:2019 Methods for rating and assessing industrial and commercial sound and BS 8233: 2014 Guidance on sound insulation and noise reduction for buildings.

The approved scheme shall be implemented prior to the commencement of the use hereby permitted and be permanently maintained thereafter.

Reason: In order to safeguard the amenities of future residential occupiers. The details are needed prior to the start of work so that any mitigating measures can be incorporated into the build.

Details of Extraction/Ventilation System

No development shall take place until a report to show the following has been submitted to and approved in writing by the Council.

- Confirmation of the odour control measures within the adjacent flue system.
- Odour impact assessment by a suitably qualified specialist.
- Assessment of noise from the flue/ associated equipment.
- Mitigation strategy for any harm identified.

The report shall demonstrate that the dwellings hereby permitted will be provided with suitable alternative (mechanical) ventilation for use at times when the flue is in use and windows cannot be opened. The mitigation strategy and mechanical ventilation should be installed prior to commencement of the residential use hereby permitted and retained thereafter in perpetuity.

Reason: In order to safeguard the amenities of future residential occupiers. The details are needed prior to the start of work so that any mitigating measures can be incorporated into the build.

Sample Panels before specified elements started

Sample panels of the frontage stonework; demonstrating the colour, texture, face bond and pointing are to be erected on site and approved in writing by the Local Planning Authority before the relevant parts of the work are commenced. The development shall be completed in accordance with the approved details before the building is occupied.

Reason: In order that the external appearance of the building is satisfactory.

Further details of Refuse Storage and Recycling Facilities before occupation

No building or use hereby permitted shall be occupied or the use commenced until detailed designs of the following have been submitted and approved in writing by the local planning authority:

- Separate dedicated suitably screened, ventilated and secure storage for 2 no. sets of the standard containers set out in the council's Waste & Recycling Guidance (this shall be separate to cycle storage).

The detail thereby approved shall be carried out in accordance with that approval and the approved storage areas as shown on approved plan made available prior to the first occupation of each of the residential and retail units. Thereafter all refuse and recyclable materials associated with the development shall either be stored within this dedicated store/area, as shown on the approved plans, or internally within the buildings that form part of the application site. No refuse or recycling material shall be stored or placed for collection on the adopted highway (including the footway), except on the day of collection.

Reason: To safeguard the amenity of the occupiers of adjoining premises; protect the general environment; prevent any obstruction to pedestrian movement and to ensure that there are adequate facilities for the storage and recycling of recoverable materials.

Further details of Cycle Parking Provision before occupation

No details of use hereby permitted shall be occupied or use commenced until detailed designs of the following have been submitted to and approved in writing by the local planning authority:

- Updated cycle storage reflecting the requirement for separate refuse and cycle storage and to indicate the intended location, dimensions, layout, and capacity of internal secure cycle storage, using the preferred 'Sheffield stand' design, in compliance with the council's Guidance of Cycle Storage.

The detail thereby approved shall be carried out in accordance with that approval prior to the occupation of the residential use and thereafter be kept free of obstruction and available only for the parking of cycles.

Reason: To ensure suitable cycle parking provision and to encourage more sustainable modes of travel.

Construction Environmental Management Plan - Major Development

No development shall take place, including any demolition works, until a construction management plan or construction method statement has been submitted to and approved in writing by the Local Planning Authority. The approved plan/statement shall be adhered to throughout the demolition/construction period. The plan/statement shall provide for:

1. A construction programme including phasing of works and construction methodology;
2. 24 hour emergency contact number;
3. Hours of operation (including deliveries and removal of plant, equipment, machinery and waste from the site) plus procedure for emergency deviation from permitted hours;
4. Expected number, type and size of vehicles accessing the site including cranes;
5. Details of management of deliveries, waste, equipment, plant, works, visitors- the use of a consolidation operation or scheme for the delivery of materials and goods;
6. On-site facilities (i.e. portacabins) and locations for storage of plant/waste/construction materials;
7. Routes for construction traffic, avoiding weight and size restrictions to reduce unsuitable traffic on residential roads;
8. Locations for loading/unloading, waiting/holding areas and means of communication for delivery vehicles if space is unavailable within or near the site;
9. Arrangements for the turning of vehicles, to be within the site unless completely unavoidable. Arrangements to receive abnormal loads or unusually large vehicles and swept paths showing access for the largest vehicles regularly accessing the site and measures to ensure adequate space is available;
10. Any necessary temporary traffic management measures;
11. Measures to protect vulnerable road users (cyclists and pedestrians);
12. Arrangements for temporary facilities for any bus stops or routes;
13. Method of preventing mud being carried onto the highway;
14. Means by which a reduction in the number of movements and parking on nearby streets can be achieved (including measures taken to ensure satisfactory access and movement for existing occupiers of neighbouring properties during construction);
15. Travel planning: car sharing, use of local workforce, parking facilities for staff and visitors, a scheme to encourage the use of public transport and cycling;
16. Methods of communicating the Construction Environmental Management Plan to staff, visitors and neighbouring residents and businesses and procedures for maintaining good public relations including complaint management, public consultation and liaison. Bristol City Council encourages all contractors to be 'Considerate Contractors' when working in the city by being aware of the needs of neighbours and the environment.
17. Arrangements for liaison with the Council's Pollution Control Team;
18. Mitigation measures as defined in BS 5528: Parts 1 and 2 : 2009 Noise and Vibration Control on Construction and Open Sites shall be used to minimise noise disturbance from construction works.
19. Control measures for dust and other air-borne pollutants. This must also take into account the need to protect any local resident who may have a particular susceptibility to air-borne pollutants.

20. Measures for controlling the use of site lighting whether required for safe working or for security purposes.
21. All works and ancillary operations (including deliveries to and removal of plant, equipment, machinery and waste) which are audible at the site boundary, or at such other place as may be agreed with the Local Planning Authority, shall be carried out only between the following hours: 08 00 Hours and 18 00 Hours on Mondays to Fridays and 08 00 and 13 00 Hours on Saturdays and; at no time on Sundays and Bank Holidays.
22. Procedures for emergency deviation of the above working hours.

Reason: In the interests of safe operation of the adopted highway in the lead into development both during the demolition and construction phase of the development and in the interests of the amenities of surrounding occupiers during the construction of the development.

Sustainability Statement

The development hereby approved shall incorporate the energy efficiency measures, renewable energy, sustainable design principles and climate change adaptation measures into the design and construction of the development in full accordance with the submitted Sustainability Statement (titled Sustainability Statement, by Complete Energy Consultancy, dated 06/03/25) prior to occupation or use commenced. A total 44.8% reduction in carbon dioxide emissions beyond Part L 2013 Building Regulations in line with the energy hierarchy shall be achieved, and a 44.8 % reduction in carbon dioxide emissions below residual emissions through renewable technologies shall be achieved

Reason: To ensure the development incorporates measures to minimise the effects of, and can adapt to a changing climate.

Renewable energy (excluding PV) - further detail is required

Prior to the commencement of the development hereby approved, details of the air source heat pump (ASHP) renewable energy technology (including the exact location, dimensions, design/ technical specification- including noise levels) together with calculation of energy generation and associated CO2 emissions to achieve 20% reduction on residual emissions from renewable energy in line with the approved energy statement should be submitted to the Local Planning Authority and approved in writing. The renewable energy technology shall be installed prior to occupation of the development and thereafter retained.

Reason: To ensure that the development contributes to mitigating and adapting to climate change and to meeting targets to reduce carbon dioxide emissions.

Noise from plant and equipment

The rating level of any noise generated by plant & equipment as part of the development shall be at least 5 dB below the pre-existing background level.

Reason: In order to safeguard nearby amenity.

----- END OF STATEMENT -----