



Planning Statement

Christchurch Hall, 38 Portland Street, Clifton, Bristol,
BS8 4JB

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Contents

1	Introduction.....	1
2	Site Location Context	3
3	Historic Context	3
4	Planning History.....	4
5	Development Proposals	5
6	Pre-application Public Consultation.....	7
7	Legal Context	7
8	Development Plan and Other Material Considerations.....	8
9	The Titled Balance.....	8
10	The Tilted Balance – Framework Protection	10
11	Tilted Balance – Adverse Impacts	13
12	Development Plan Compliance	13
13	Adverse Impacts	22
14	Benefits of the Development	23
15	The Planning Balance	24
16	Summary and Conclusion.....	26
	Appendix 1 – Mail Merge Consultation Letter	27
	Appendix 2 – Public Consultation website.....	28
	Appendix 3 – Letter dated 21 st May 2024 from Bristol Old Vic Theatre School.	29

1 Introduction

- 1.1 Crossman (Portland Street) Ltd, part of the Crossman Group of Companies, has acquired Christchurch Hall in Clifton (the property) and is seeking planning permission and listed building consent for:

‘Change of use of existing building to 9 flats, office, and associated alterations to the building.’

- 1.2 Christchurch Hall was originally a warehouse, although has since been used for a variety of uses including parish hall, and more recently recording/editing studio, theatrical teaching space and associated office, operated by the Bristol Old Vic Theatre School (BOVTS). However, the facilities are no longer required by BOVTS, largely due to them being dated, and no longer fit-for-purpose. Therefore, at the end of its current tenancy, the BOVTS intends to relocate the facilities to new, modern accommodation elsewhere on the BOVTS estate.
- 1.3 The property was likely constructed in the mid-19th century on the site of an earlier structure and lies between two rows of former workers cottages known as ‘Carter’s Buildings’. The property is Grade II listed and located within the Clifton and Hotwells Conservation Area.
- 1.4 The property has seen numerous changes over the years, most notably in 1986 when the BBC undertook a conversion and made significant changes to the building, which included a replacement roof (and insertion of dormer windows) and major internal strip out to create the soundproofed recording/editing studio as well as the theatrical space and associated offices. Given the age and generally poor internal condition of the property, it is no longer considered fit-for-purpose, and therefore the tenant is intending to relocate to modern facilities.
- 1.5 The proposed development focusses on a reorganisation of the internal spaces within the property to provide modern, open plan living in the form of nine apartments with a mix of 1 bed, 2 bed and 3 bed duplex units with associated servicing, and a dual level office space over the ground floor and basement. In terms of the office space provision, the applicant’s business will occupy part of the space, with the remaining office being made available as a commercial office hub which it is envisaged will be used by the wider community, in particular those individuals working from home in the locality who, on occasion, require a more formal setting.
- 1.6 The purpose of this statement is to describe the application proposals, set out the planning merits and to demonstrate the application’s compliance with planning policy requirements.

1.7 In addition to this planning statement, the planning application and listed building consent application comprise the following:

Covering letter;

Application form and certificates;

CIL form;

Site location plan;

Drawing Pack and Schedule, including;

- o Demolition Plans.
- o Staircase Plan - elevations for LBC.
- o Detailed window drawings for LBC.
- o Repair Methodology for windows (LBC).
- o External scope of works to the building (LBC)
- o Thermal insulation strategy and materials (LBC).

Design and access statement;

Heritage impact assessment;

Transport statement;

Travel plan;

Sustainability statement;

Energy strategy;

Economic statement and;

Employment and skills strategy.

2 Site Location Context

- 2.1 The property is located within the suburb of Clifton which is approximately 2.6 km (1.6 miles) to the northwest of Bristol city centre. The existing property is a four-storey, mid terraced building of solid masonry construction with a traditional pitched cut timber framed roof. The property lies between Portland Street (to the south) and Gloucester Street (to the north). Both streets are located within Clifton's 'village centre'.
- 2.2 Courtyard spaces (shared with residential properties with access off Portland Street) form the immediate western and eastern boundaries to the property, whilst residential properties fronting onto Gloucester Street form the northwestern and northeastern boundaries.
- 2.3 To the west of the property on the Portland Street side, is the Coronation Tap public house. Portland Street leads on to The Mall, a primary shopping area, and which is one of the main thoroughfares of Clifton, known for its range of restaurants, pubs, cafes, shops, amenities, and other professional services. Gloucester Road to the north comprises largely residential properties. On this basis, the property is located within an area of mixed commercial and residential uses.
- 2.4 The total footprint of the Christchurch Hall building (including the parking area and storage area for refuse purposes) measures approximately 0.034ha.

3 Historic Context

- 3.1 The property is Grade II listed alongside Carter's Buildings which flank its eastern and western elevations. The property has experienced a significant amount of change to its layout, floor plans and fabric because of two significant conversions, the most recent being that undertaken by the BBC when they were operating from the property.
- 3.2 The first, in the late 19th century, saw the removal of floors of the former warehouse to create double height church hall spaces. The second in the 1980s saw the substantial removal of fabric, installation of air conditioning and substantial electric services, the installation of sound proofing equipment and the creation of new partitions to create the recording studio use. It was during the BBC's tenure that the roof was replaced with artificial slate and the ventilation dormers inserted. As such, there is a negligible amount of internal fabric or features from the original warehouse period which remain legible. Bar some retained features such as the historic north and south staircases (to be retained in the proposed scheme), and the retained original

roof trusses, the property is largely now an external historic envelope hosting a largely modern, albeit obsolete, interior.

- 3.3 This narrative shows that the significance of the property has been diluted over time, especially during the BBC's conversion which was considered the most intrusive use to the original building whereby the evidential value today relates largely to the fixtures and fittings evident within the property, rather than the building structure and fabric itself.
- 3.4 The property lies within the Clifton and Hotwells Conservation Area which benefits from a conservation area appraisal and management plan. More specifically, it is located in the character area known as 'The Clifton Spa Terraces' and is described as follows:

'Carter's Buildings (1790s altered 1850) is a complex of listed warehouse and workers courtyard housing off Portland Street West. This intimate space is unique and in Clifton, with an intimate character that is relatively unaltered. The original Pennant flagged street surface and Windsor lantern remain'.

4 Planning History

- 4.1 There is limited planning history associated with the site but for completeness it is summarised as follows:

12/03939/LA – Renew roof covering with a breathable membrane, battens and artificial slates, provide insulation below the new roof covering. Re-line the parapet gutters in lead. Lift and re-bed coping stones to perimeter parapet wall. Hack off existing cementitious render to the rear face of the parapet wall and renew with a lime-based render. Approved 8th November 2012.

86/01737/F – Addition of louvred dormer units for fresh air intake and extract. Approved 11th August 1986.

85/03272/F – Relocate air conditioning plant room. Add louvred dormer units for fresh air intake and extract. Stone cleaning. Approved 24th March 1986.

- 4.2 Planning application 12/03939/LA was the most recent application approved in 2012 which only sought listed building consent for the replacement of the roof coverings and gutter linings and repairs to the parapet, which had degraded over time.

5 Development Proposals

5.1 The proposed description of development is:

'Change of use of existing building to 9 apartments, office, and associated alterations to the building'.

The proposed development includes high quality office space on the ground floor and basement level. Furthermore, a total of nine apartments comprising a mix of 1 bed, 2 bed and 3 bed duplexes are proposed on levels one to four. The floorspace of both the office accommodation and each individual apartment is provided in the accommodation schedule below:

Basement – office (97m²);

Ground floor – office (157m²);

First floor:

- o 1 bed 2 persons apartment (53m²);
- o 2 bed 4 persons apartment (66m²);
- o 2 bed 4 persons apartment (73m²);

Second floor:

- o 1 bed 2 persons apartment (55m²);
- o 2 bed 4 persons apartment (71m²);
- o 2 bed 4 persons apartment (74m²);

Third and fourth floors:

- o 3 bed 6 persons duplex apartment (112m²);
- o 3 bed 6 persons duplex apartment (136m²);
- o 3 bed 6 persons duplex apartment (143m²).

Car Parking

5.2 Within the application redline boundary, there is an existing parking area accessed off Portland Street opposite the main entrance to the property. Notwithstanding the site's highly sustainable location, two car parking spaces are proposed which will be allocated for office use between 9am and 6pm and then re-allocated to the two largest (3-bed duplex) outside of these hours.

Cycle Parking

- 5.3 In accordance with the council's standards, there is a secure cycle store located within the development with space for 16 cycle parking spaces, comprising a mix of accessible Sheffield hoops, upper tier double stackers and vertical wall hangers. There is a further requirement for at least 3 cycle spaces for the proposed office use which will be provided in a separate store located close to the main entrance lobby accessed off Portland Street.

Pedestrian Access

- 5.4 Portland Street will provide shared access to the office space as well as six apartments. The remaining three apartments will be accessed from the Gloucester Street entrance.

General Servicing and Storage

- 5.5 In terms of servicing and maintenance, there will be a shared plant room located in the basement of the building. This will be accessed off the vertical circulation core via the Portland Street entrance. The proposal also benefits from additional storage for residents in the basement, with each residential unit having access to a secure private store.

Refuse Storage

- 5.6 The waste collection point will be located adjacent to the proposed car parking area located almost directly opposite the Portland Street entrance. Refuse storage pursuant to the building has always been located here, but the proposals seek to provide a better storage arrangement in accordance with the guidance set out in BCC's 'Waste and Recycling Storage and Collection Facilities Guidance for Developers of Residential, Commercial and Mixed-Use Properties document' (March 2022). The waste collection point will not cause conflict with the car parking area and will also help to mitigate the risk of refuse and recycling causing an obstruction on Portland Street. The refuse and recycling will be collected by separate operatives of Bristol Waste with refuse being collected fortnightly and recycling weekly. In accordance with the specific requirements of the development, refuse storage will include the following:

4 no. green recycling boxes for plastic/cans;

2 no. black recycling boxes for glass and paper;

4no. blue sacks for card;

2no. food waste bins; and

1580L of communal refuse storage including a 1100L container and 2no. 240L containers to be shared between residents.

6 Pre-application Public Consultation

- 6.1 A letter to nearby residents and businesses within the vicinity of the Site was issued on 2 October 2024 (see Appendix 1). This provided a brief overview of the proposals and then directed members of the public to a formal consultation website where they could find out more details about the proposals including the historic context of the building, benefits of the development and contact details in order to be able to send their feedback should they have any queries or concerns (Appendix 2). To date, no feedback to the consultation has been received following the mail merge letter and publication of the consultation website.

7 Legal Context

- 7.1 Section 66 of the Planning (Listed Building and Conservation Areas Act) 1990 (as amended) states that:

‘...in considering whether to grant planning permission for development that affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest that it possesses.

- 7.2 Moreover, in respect of development located within a conservation area, section 72(1) of the act states that:

‘in the exercise of planning functions, with respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.’

- 7.3 In respect to the determination of planning applications, section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that:

‘where in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material consideration indicates otherwise.’

8 Development Plan and Other Material Considerations

8.1 Those components of the development plan relevant to the application comprise of the following development plan documents:

Bristol Core Strategy (June 2011); and

Site Allocations and Development Management Policies Local Plan (July 2014).

8.2 The following material considerations are also of relevance:

The National Planning Policy Framework (the Framework) (updated December 2023);

The Planning Practice Guidance (last updated February 2024);

Waste and Recycling: Collection and Storage facilities (updated March 2022);

Climate Change and Sustainability Practice Note and Addendum (June 2023);

Clifton and Hotwells Character Appraisal and Management Proposals (June 2010);

Space Standards Practice Note (March 2021).

9 The Titled Balance

9.1 Paragraph 11d) of the Framework states that:

‘Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.’

9.2 Whether the application falls to be determined under the provisions of the Framework paragraph 11d) (‘the tilted balance’) is considered below, having particular regard to whether the most important policies to the determination of the application are out-of-date.

Out-of-date Policies

9.3 Wavendon Properties v SSHCLG & Milton Keynes Council, confirms that when applying paragraph 11d), the first task is to establish which are the development plan policies most important to determining the application. Having established ‘the basket’ of policies, the second task is to determine which of those policies, if any, are out-of-date.

9.4 The basket of most important policies is considered to comprise of the following:

Bristol Core Strategy:

- o BCS5 – Housing Provision;
- o BCS8 - Delivering a Thriving Economy;
- o BCS10 – Transport and Access Improvements;
- o BCS12 – Community Facilities;
- o BCS13 – Climate Change;
- o BCS14 – Sustainable Energy;
- o BCS15 – Sustainable Design and Construction;
- o BCS18 – Housing Type;
- o BCS20 – Effective and Efficient Use of Land;
- o BCS21 – Quality Urban Design; and
- o BCS22 – Conservation and the Historic Environment.

Site Allocations and Development Management Policies Local Plan (SADMP):

- o DM5 – Protection of Community Facilities;
- o DM12 – Retaining Valuable Employment Sites;
- o DM23 – Transport Development Management;
- o DM30 – Alterations to Existing Buildings; and
- o DM31 – Heritage Assets.

9.5 Footnote 8 of paragraph 11 of the Framework states that the most important policies for determining an application involving the provision of housing will be out-of-date in situations where:

‘...the local planning authority cannot demonstrate a five-year supply (or a four-year supply, if applicable, as set out in paragraph 226) of deliverable housing sites (with a buffer, if applicable, as set out in paragraph 77) and does not benefit from the provisions of paragraph 76; or (b) where the Housing Delivery Test indicates that the delivery of housing was below 75% of the housing requirement over the previous three years’.

- 9.6 The council’s latest position concerning its five-year housing land supply was published in June 2021 in the document: Bristol City Council Five Year Housing Land Supply Assessment 2020 to 2025. This document, whilst three years out-of-date, confirmed that the council could only demonstrate a 3.7 years’ supply. Since the publication of this document, it has been acknowledged at planning appeals that the housing land supply position has worsened, with the latest confirmed position being a supply of between 2.24 years and 2.45 years¹.
- 9.7 Therefore, having regard to footnote 8 of paragraph 11d) of the Framework, and also *Wavendon Properties v SSHCLG & Milton Keynes Council*, by virtue of the council being unable to demonstrate a five year-supply of deliverable housing sites, the basket of most important policies is out-of-date and benefit from only limited weight.
- 9.8 On the basis of the above, the application should be determined in accordance with paragraph 11d) of the Framework applying the ‘tilted balance’. Application of the ‘tilted balance’ has been undertaken in the sections below.

10 The Tilted Balance – Framework Protection

- 10.1 Where the titled balance is engaged, paragraph 11d) of the Framework confirms that planning permission should be granted unless:

‘The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed’.

- 10.2 Given that policies relating to designated heritage asset's is listed at footnote 7 of the Framework, there is a requirement to have regard to Framework paragraph 205 which states:

‘When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more

¹ Land at Broomhill/Brislington Meadow, Bristol (ref: APP/Z0116/W/22/3308537 – April 2023)

important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.’

10.3 Notwithstanding the above, paragraph 208 of the Framework states that:

‘Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.’

10.4 Turning first to establishing the heritage assets optimum viable use. The Planning Practice Guide states that:

The vast majority of heritage assets are in private hands. Thus, sustaining heritage assets in the long term often requires an incentive for their active conservation. Putting heritage assets to a viable use is likely to lead to the investment in their maintenance necessary for their long-term conservation.

By their nature, some heritage assets have limited or even no economic end use. A scheduled monument in a rural area may preclude any use of the land other than as a pasture, whereas a listed building may potentially have a variety of alternative uses such as residential, commercial and leisure.

In a small number of cases a heritage asset may be capable of active use in theory but be so important and sensitive to change that alterations to accommodate a viable use would lead to an unacceptable loss of significance.

It is important that any use is viable, not just for the owner, but also for the future conservation of the asset: a series of failed ventures could result in a number of unnecessary harmful changes being made to the asset.

If there is only one viable use, that use is the optimum viable use. If there is a range of alternative economically viable uses, the optimum viable use is the one likely to cause the least harm to the significance of the asset, not just through necessary initial changes, but also as a result of subsequent wear and tear and likely future changes. The optimum viable use may not necessarily be the most economically viable one. Nor need it be the original use. However, if from a conservation point of view there is no real difference between alternative economically

viable uses, then the choice of use is a decision for the owner, subject of course to obtaining any necessary consents.

Harmful development may sometimes be justified in the interests of realising the optimum viable use of an asset, notwithstanding the loss of significance caused, and provided the harm is minimised. The policy on addressing substantial and less than substantial harm is set out in paragraphs 193 to 196 of the National Planning Policy Framework. (Planning Practice Guide, paragraph: 015, reference ID: 18a-015-20190723)

- 10.5 The Site was subject to an extensive marketing campaign by JLL, with an associated marketing report being included with the application. As a result of the marketing campaign, the majority of offers received were for a residential use of the Site. Two offers were also received from an audio and visual company that sought to continue the Site's existing use, however, these offers were significantly below others received and were therefore not economically viable.
- 10.6 As set-out in the above guidance, it is important that any use is viable, not just for the owner, but also the future conservation of the asset. Therefore, whilst there was some very limited interest in retaining the existing use of the asset, these offers were not economically viable, making them inappropriate for both the owner and also the on-going conservation of the asset.
- 10.7 Given the above, being the only viable use of the heritage asset, the proposed development is considered to be the optimum viable use.
- 10.8 As acknowledged by the planning practice guidance, harmful development may be justified in the interests of realising the optimum viable use of an asset, notwithstanding the loss of significance caused. The planning application is accompanied by a heritage impact assessment (HIA) prepared by Cotswold Archaeology. The assessment of effects has concluded that the scheme will result in less than substantial harm at the lower end of the scale to the significance of the listed building. Furthermore, the effects of the amended roof profile has been considered in the context of the character and appearance of the Clifton and Hotwells Conservation Area, with which it will assimilate well, and no harm to its special interest has been identified.
- 10.9 The low degree of less than substantial harm to the significance of the property's heritage value will be mitigated by measures proposed within the scheme. For example, when assessed in the light of the need for a viable new use and the levels of change which have already affected the physical fabric of the building, the proposed repair works, reinstatement of historic features

(opening blocked windows etc.) and the revealing of existing features will have beneficial effects.

10.10 The public benefits arising from the proposed development are significant and are detailed in Section 14 below. Overall, the combination of public benefits resulting from the proposal are considered to clearly outweigh the less than substantial harm to the significance of the property's heritage value.

10.11 Therefore, the test set by Framework paragraph 11d)i has been satisfied, in so far as the application of policies in the Framework, in this instance those concerning heritage, do not provide a clear reason for refusing the proposed development.

11 Tilted Balance – Adverse Impacts

11.1 Paragraph 11 d)ii of the Framework requires any adverse impacts resulting from the development to be significantly and demonstrably outweighed by the benefits when assessed against the policies of the Framework taken as a whole. As confirmed by the courts², this assessment should also include consideration of the extent to which a proposal accords with those policies most important to the determination of the application, although where it is shown that these policies are out of date, as is the case here, they should only be afforded limited weight.

11.2 Given the primacy of the development plan, the proposal's compliance with the most important, albeit out-of-date policies, is demonstrated in the section below, followed by an assessment of the adverse impacts and associated benefits.

12 Development Plan Compliance

12.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 sets out that the starting point for the determination of a planning application is the relevant policies set out in the development plan. This assessment has been carried out below:

BCS5 – Housing Provision

12.2 Policy BCS5 seeks to deliver a minimum of 24,600 dwellings during the plan period of 2006 to 2026. The policy envisages a broad distribution of these dwellings across identified areas of the

² Gladman Developments Ltd v Secretary of State for Housing, Communities and Local Government

city comprising of 'South Bristol', City Centre', Inner East', 'Northern Arc' and finally the 'Rest of Bristol'. As the property is located in Clifton, it falls within the 'Rest of Bristol', in which a minimum of 6,000 dwellings are to be delivered.

- 12.3 According to the Council's latest monitoring data³, a total of 6,245 dwellings have been delivered against a target of 6,000 dwellings. This data is now more than two years old, so it is possible that the total number of housing completions may have exceeded the target of 6,000 dwellings. However, given that the target is expressed as a minimum, in the event that over delivery was to occur, this would not result in a policy breach. Moreover, given the Council's severe housing land supply shortfall, any over provision in housing against the policy's target should be seen as a significant benefit. Therefore, the proposed change of use to deliver nine residential apartments would accord with policy BCS5.

BCS8 – Delivering a Thriving Economy and Policy DM12 – Retaining Valuable Employment Sites

- 12.4 Policy BCS8 states that new employment floorspace suitable for small businesses will be encouraged as part of any mixed-use development. The proposed dual level office space on the ground floor and basement levels would be located in a highly sustainable location, providing office space for the applicant's business. The remaining office space that is not utilised by the Crossman Group will be made available as an office hub for the benefit of the wider community. As a mixed-use development, the proposed conversion of the building will support the policy aims of Policy BCS8 when considering employment floorspace for smaller businesses.
- 12.5 Policy DM12 seeks to retain employment floorspace outside of the city's designated primary industrial and warehouse areas (PIWAs) to make sure they make a valuable contribution to the economy and provide employment opportunities. Whilst the previous use of the property also included a level of office provision ancillary to the recording and teaching uses, the proposed development will be providing a greater quantum of higher quality employment floorspace that makes more efficient use of the building. The supporting text to Policy DM12 acknowledges that maintaining a range of employment sites across the city also helps reduce the need to travel, especially by car, which the scheme does. Therefore, on balance, the proposed scheme is seeking to provide better quality employment floorspace and thus accords with policy DM12.

³ Bristol Development Monitoring Report 2022.

BCS10 – Transport and Access Improvements and DM23 – Transport Development Management

- 12.6 Policy DM23 requires all new development to not give rise to unacceptable traffic conditions and to ensure adequate cycle and parking arrangements are provided. There is flexibility to the council's parking standards with regards to individual or small-scale developments as is proposed here. Two car parking spaces are currently provided for the building. These are located off-street almost directly opposite the Portland Street entrance. During business hours (between 08:00 and 18:00 Monday to Friday), they will be reserved for those working in the office space. Outside of those times, they will be allocated for use by the two largest residential units only. In order to manage the allocation of these spaces, parking permits will be issued by the developer to the employees of the office space during the day and to the largest residential units during the evening. The remainder of the residential units will be car free. In accordance with the Clifton Village residential parking zone, residents will not be entitled to apply for parking or visitor permits, thereby discouraging car ownership. Given the highly sustainable location of the property, which includes excellent public transport connectivity, the absence of car parking is not considered to be an issue.
- 12.7 In terms of cycle parking, and in accordance with the council's standards, a cycle store will be located on the basement floor, which will provide accommodation for sixteen bicycles. This will be through a combination of two-tier stackers and Sheffield bike stands.
- 12.8 The submitted transport statement confirms that extensive local amenity provision, including employment opportunities (see table 5.1 of the transport statement) are situated within 2km of the proposed development. The vast majority of them are within 500m of the property and so are easily accessible by walking and cycling. In addition, the property is situated within 500m of The Mall, Princess Victoria Street and Regent Street / Clifton Down Road, which form the main shopping streets within Clifton Village. Moreover, a large number of cafes, takeaways, bars and restaurants are all situated within this area together with a number of independent shops, which further enhance the sustainability credentials of the proposed development.
- 12.9 With respect to pedestrian connectivity, Portland Street, Gloucester Street, The Mall and Sion Place all benefit from footway provision. A pedestrian crossing located on Gloucester Row, close to the junction with The Mall (to the north of the site), provides access onto a number of pedestrian only routes that run along the edge of Clifton Village towards Clifton Down as well

as a pedestrian route towards Clifton Suspension Bridge, Ashton Court Estate and Leigh Woods. As stated above, the nearby shopping streets of Princess Victoria Street and Regent Street / Clifton Down Road also benefit from being accessible for pedestrians and cyclists. Furthermore, the property is located in close proximity to a number of marked cycle routes, for example, the Portway can be accessed from Hotwells Road approximately 1.2km to the south of the development or from Bridge Valley Road approximately 2.1km to the northwest. This route provides a traffic free cycle route along the northern side of the Floating Harbour into Bristol City Centre and towards Shirehampton and Avonmouth.

12.10 Moreover, connections can be made at Hotwells onto the Festival Way cycle route (part of National Cycle Network Route 33), which offers a route towards the University of the West of England's Bower Ashton Campus, Long Ashton and Nailsea and also onto National Cycle Network Route 41, which provides a link towards Pill, Portishead and Clevedon. Lastly, the Downs Way can be accessed from Woodland Road, close to Clifton Triangle and Bristol University. Those residents that are not in possession of a bicycle can make use of Bristol's cycle and scooter hire scheme.

12.11 In terms of public transport, the development is well served by local bus services, and these can be accessed from bus stops on Clifton Down Road (Clifton Village) and Clifton Down (Clifton Christchurch) both of which are located approximately 300m from the property. It is also important to note that there are four car club facilities located within close proximity to the property which reduces the need to own and park a vehicle at the property.

12.12 Turning to vehicle trips, the proposed development will result in a net reduction in trips generated by all modes of transport which is considered to be a major benefit.

12.13 Therefore overall, there will be no severe residual cumulative impacts resulting from the proposed development nor an unacceptable impact on highway safety. Accordingly, the proposed development is in accordance with policies BCS10 and DM23.

BCS12 - Community Facilities and Policy DM5 - Protection of Community Facilities

12.14 The policy basis for community facilities is that they should be retained, unless it can be demonstrated that there is no longer a need to retain the use, or where alternative provision is made. The property has seen numerous changes over the years, being currently used as a recording/editing studio as well as theatrical space and associated offices. Whilst the core

strategy acknowledges that the term ‘community facilities’ is wide ranging, incorporating a variety of uses, it does acknowledge at paragraph 4.12.3 that:

‘Such services and facilities provide a focus for local people, helping to promote better personal contact between groups and individuals and generating community spirit and a sense of place. Together, they are all essential to the quality of life of people living and working in Bristol and can help to reduce levels of deprivation and social exclusion and improve health and wellbeing.’

12.15 Whilst the existing use does exhibit some characteristics of a community use, principally the theatrical space and recording studio, this area is limited in area, and only accessible to a very small section of the community who attend BOVTS. On this basis, it is not considered to reflect the characteristics of a community facility envisaged by policy BCS12 (paragraph 4.12.3) in so far as the use does not:

Provide a focus for local people, only the small number, and select few students and staff that attend BOVTS and utilise the property; or

Help promote better personal contact between groups and individuals, or generate community spirit – again as the property is occupied by only a small number, and select few of BOVTS students and staff.

12.16 On this basis, the existing use of the property as a recording/editing studio, theatrical space and associated offices is not considered to be engaged by policy DM5 (Protection of Community Facilities). Notwithstanding this, for completeness a full assessment of the proposed development has been undertaken against the requirements of policy DM5:

12.17 Policy DM5 (Protection of Community Facilities) specifically states:

“Proposals involving the loss of community facilities land or buildings will not be permitted unless it is demonstrated that:

- i) The loss of the existing community use would not create, or add to, a shortfall in the provision or quality of such uses within the locality or, where the use has ceased, that there is no need or demand for any other suitable community facility that is willing or able to make use of the building(s) or land; or

- ii) The building or land is no longer suitable to accommodate the current community use and cannot be retained or sensitively adapted to accommodate other community facilities; or
- iii) The community facility can be fully retained, enhanced or reinstated as part of any redevelopment of the building or land; or
- iv) Appropriate replacement community facilities are provided in a suitable alternative location”.

12.18 Given the wording of the policy, compliance with only of the policy criteria is necessary. Regardless, consideration of all criteria has been undertaken below:

12.19 Criterion i) - BOVTS’s existing use of the property is incredibly bespoke, with demand for such facilities being restricted to the limited number of BOVTS students and staff who attend the property. Consequently, there is no identifiable demand for such a community facility in the locality, therefore its loss would not create or add to, a shortfall of such a bespoke use. Moreover, correspondence provided by BOVTS (see Appendix 3) has confirmed the intention to relocate the existing uses at the property (or similar) to elsewhere on BOVTS’s estate. Therefore, there would be no net loss of community facility provision.

12.20 Criterion ii) – the existing accommodation and facilities at the property are now outdated, and are no longer suitable to accommodate the existing use. For these reasons, amplified by the listed status of the property, and the associated challenges and costs with a programme of modernisation, the property cannot be retained or adapted for an alternative community facility.

12.21 Criterion iii) – whilst the existing quasi community uses cannot be retained in the development, the proposal includes an office hub, that will provide ‘hot desks’ and associated ancillary office facilities such as meeting rooms and printing facilities that will be accessible to members of the community who can hire out this space. It is envisaged that this service will be particularly popular to those individuals who work from home in the locality, and who on occasion require a more formal office environment. Given that this part of the development can be hired out by anyone in the community, this increased accessibility to the property is far more likely to reflect the goal of policy BCS12 by providing a focus for local people and also presenting an opportunity for individuals who do not normally mix to come together.

12.22 Criterion iv) – whilst the proposed development does not provide alternative community facilities, it has been confirmed by BOVTS that the existing facilities will be relocated elsewhere on the BOVTS estate. Therefore, there will be no net loss of community facility provision.

12.23 Given the above, the proposed development satisfies the requirements of Policies BCS12 and DM5.

BCS13 – Climate Change

12.24 Policy BCS13 requires that development should contribute to both mitigating and adapting to climate change, and to meet targets to reduce carbon dioxide emissions. The proposed development has been well designed to cope with and mitigate against the effects of climate change. The submitted energy strategy proposes the installation of air source heat pumps to help reduce the carbon dioxide emissions associated with the property, whilst the proximity of local amenities and public transport links should help to reduce car journeys associated with the development. Additionally, as the works are wholly contained in the existing property structure, flood risk at the site will not be affected (notwithstanding it is only located in flood zone 1).

12.25 The thermal elements and fenestration have been designed to meet and exceed the standards set out in the Approved Document L1. Furthermore, the property has been designed such that cross ventilation is possible from the west-side to the east-side through openable windows. This will help reduce the need for mechanical ventilation now and in the case of a potentially warmer future climate.

12.26 Therefore, the proposed development would accord with Policy BCS13.

BCS14 – Sustainable Energy

12.27 Policy BCS14 specifically requires new development to include measures to reduce carbon dioxide emissions from energy use in accordance with an energy hierarchy. Through adherence with the energy hierarchy, it must be demonstrated that through renewable energy generation, carbon dioxide emissions from residual energy use are reduced by at least 20%.

12.28 As set out in the submitted energy strategy, the total reduction in carbon emissions from on-site renewables would be a 72.10% reduction beyond residual emissions. Therefore, the proposed development would accord with Policy BCS14.

BCS15 – Sustainable Design and Construction

- 12.29 Policy BCS15 requires sustainable design and construction techniques to be integral to all new developments. As set out in the submitted sustainability statement, there are no proposals to include artificial cooling as part of the conversion. Cross ventilation and appropriate internal shading such as blinds and curtains will be used to mitigate against the effects of overheating from the sun. Furthermore, a site waste management plan will be developed for the development where the waste groups to be monitored will be identified and targets set in order to identify how waste will be reduced, diverted from landfill, reused or recycled where possible.
- 12.30 All materials specified for the new construction will be at least ‘B’ rated or higher under the BRE’s Green Guide to Specification, in-line with guidance in the Climate Change and Sustainability Practice Note. This will ensure that construction is more sustainable and environmentally friendly. Therefore, the proposed development would accord with Policy BCS15.

BCS18 – Housing Type

- 12.31 Policy BCS18 ensures that new residential development provides for a range of housing types to help support the creation of mixed, balanced and inclusive communities. The mix of 1-bed, 2-bed and 3-bed duplexes will provide a valuable contribution to the city’s housing requirement.
- 12.32 According to the publication version of the council’s latest ‘Housing Need and Supply Position Paper’ (dated November 2023), households are getting smaller on average, with fewer people living in each home meaning that more homes are needed. Therefore, the proposed development offers a range of apartment sizes in terms of type and number of bedrooms, all of which exceed the relevant space standards.
- 12.33 Moreover, the proportion of apartments in the housing stock is forecast to rise further, particularly in the more urban and densely populated locations like where the property is located. Therefore, the proposed mix of apartments will respond well to those seeking to live and work in the more accessible and commercially thriving locations. For the above reasons the proposed development accords with Policy BCS18.

BCS20 – Effective and Efficient Use of Land and Buildings

12.34 Policy BCS20 promotes higher density development on previously developed land, in highly sustainable locations, such as along main public transport routes. In this regard, the application site constitutes previously developed land and is located in the highly sustainable location of Clifton, being within walking distances of a wide range of local services and amenities and in close to proximity to frequent bus services and a short walking distance to the Clifton Down railway station (see submitted transport statement).

12.35 Therefore, the proposed development is considered to meet the requirements of higher density development, and through the efficient re-use of the existing property, it would not have a detrimental impact on the character of the area. Repurposing the existing property more effectively and efficiently will provide an appropriate mix of housing to meet the community's needs and demands whilst also achieving high-quality, well-designed office space that requires minimal changes to the exterior fabric of the building. Therefore, the proposed development constitutes a highly sustainable re-use of the existing property and would accord with Policy BCS20.

BCS21 – Quality Urban Design and DM30 – Alterations to Existing Buildings

12.36 Both policies BCS21 and DM30 seek to ensure that new development delivers high quality urban design and architectural treatments. The emphasis of the proposed scheme is on the retention and reuse of the property in order to preserve the existing building and its identity, therefore protecting the character and appearance of the area. Repurposing the property with a new mixed use will allow the listed building to ensure its ongoing use and conservation.

12.37 The proposed development involves mainly internal changes to the property, with external works limited to the proposed roof form and the reinstatement of double height timber windows.

12.38 Dealing first with the proposed mansard roof and dormers windows. This new roof is of an appropriate proportion to the existing property and would not exceed the height of the existing roof. Its design takes precedent from the surrounding area and replicates the use of slate which is predominantly used on the roofs of existing buildings, thereby its incorporation into the property, along with the dormer windows, would not appear as incongruous features. Turning to the windows, these would comprise a re-instatement of previously blocked-in windows, and

due to the proposed use of matching timber, would facilitate an authentic architectural treatment to the property.

12.39 In relation to the internal layout of the development, the residential units provide high quality living accommodation and where possible have been designed to exceed national housing space standards. Moreover, in terms of satisfying the other requirements of Policy BCS21, the layout, form and mix of development supports walking and cycling provision and the dual level office space is a good use of the existing below ground space to provide a high-quality working environment in an appropriate location.

BCS22 – Conservation and the Historic Environment and DM31 – Heritage Assets

12.40 Policy BCS22 requires proposals to safeguard or enhance heritage assets and the character and setting of areas of acknowledged importance, including historic buildings (both nationally and locally listed) and conservation areas. The assessment of effects in the accompanying HIA has concluded that the scheme overall (when considering both levels of harm and enhancements together), will result in less than substantial harm at the lower end of the scale to the significance of the listed building. This less than substantial harm is considered to be outweighed by the resulting public benefits of the proposed development, as set out at section 14 below.

12.41 The effects of the proposed new roof have been considered in the context of the character and appearance of the conservation area, with which it will assimilate well, and no harm to its special interest has been identified.

12.42 For the above reasons the proposed development is considered to accord with policies BCS22 and DM31.

13 Adverse Impacts

13.1 It has been demonstrated that the development proposals accord with the most important, albeit out-of-date local plan policies, a benefit that carries substantial weight. In addition, the tilted balance set by paragraph 11d)ii of the Framework also requires an assessment as to whether the adverse impacts of approving the development would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole.

- 13.2 In this case the only adverse impact identified relates to heritage and the less than substantial harm at the lower end of the scale to the significance of the listed building. The next step of paragraph 11d) ii of the Framework is to establish the resulting benefits, thereby enabling the ‘tilted balance’ exercise to be undertaken.

14 Benefits of the Development

- 14.1 The following benefits would result from the development.
- 14.2 Compliance with policies – the proposed development accords with all development plan policies assessed in the preceding section. As a result, the proposal should be granted planning permission. This benefit should be afforded significant weight.
- 14.3 Delivery of 9 residential apartments – the proposed development will contribute to the much-needed housing supply across Bristol, in a city that is experiencing a critical shortage of housing delivery. Therefore, the delivery of this accommodation is a benefit that should be afforded significant weight.
- 14.4 Increased quantum of higher quality employment floorspace – the mixed-use conversion of the property would provide much needed office accommodation for the applicant (part of the Crossman Group) in a sustainable location. Any remaining office space would be made available as an office hub for the benefit of the wider community thus offering attractive “hot desking” opportunities for local people who might be working from home and on occasion require a more formal setting. Therefore, the new better quality office space is considered to be a benefit that should be afforded significant weight.
- 14.5 Placing the heritage asset in a viable use consistent with its conservation – the heritage benefits of the scheme include the following:
- Repair and conservation of the listed building and its intrinsic fabric;
 - Establishment of the optimum viable new use consistent with its ongoing conservation;
 - Reinstatement of several infilled double height windows;
 - Uncovering and better revealing the original building fabric and structure
- 14.6 The resulting heritage benefits should be afforded significant weight.

- 14.7 Sustainable construction – through the use of sustainable construction techniques, including the provision of on-site renewable technologies (air source heat pumps), the proposed development would achieve a 72.10% reduction in carbon dioxide beyond residual emissions. Given the climate emergency, this benefit should be afforded moderate weight.
- 14.8 Efficient use of previously developed land – the re-use of an existing property as opposed to reliance on new-build development is highly sustainable and in itself would result in significant savings in carbon dioxide. This benefit should be afforded significant weight.
- 14.9 Reduction in vehicular movements – the proposed development would result in a notable reduction in vehicular movements which is a benefit that should be afforded moderate weight.

15 The Planning Balance

- 15.1 After establishing the proposal's conformity with out-of-date policies, the extent of adverse impacts, and finally its resulting benefits, the planning balance exercise can be undertaken, as shown in Table 1 below:

Adverse Impacts	Benefits
Less than substantial harm at the lower end of the scale to a heritage asset – moderate weight.	Compliance with the basket of out-of-date policies – significant weight.
	Delivery of 9 residential apartments – significant weight.
	Retention and improvements to heritage assets – significant weight.
	72.10% CO ₂ reduction beyond residual emissions – moderate weight.
	Efficient use of previously developed land – significant weight.
	New (better quality) employment floorspace for smaller businesses and the benefit of the local community – moderate weight.
	Reduction in vehicular movements – moderate benefit.

Table 1: planning balance exercise

15.2 Having regard to the above, it is clear that the adverse impacts of approving the application would not significantly and demonstrably outweigh the benefits when assessed against the policies of the Framework taken as a whole. Therefore, in accordance with paragraph 11d) of the Framework, the proposal constitutes sustainable development and should be approved without delay.

16 Summary and Conclusion

- 16.1 The council is currently unable to demonstrate a five-year housing land supply, therefore the most important policies relevant to the proposed development are out-of-date and benefit from only limited weight. Notwithstanding this, the proposed development would accord with all development plan policies and on this basis alone, the planning application should be granted permission.
- 16.2 The proposed conversion of the property would utilise previously developed land and would maintain a design that is in harmony with the aesthetics of the original property and its significance as a listed building, whilst also respecting the character and appearance of the conservation area. Notwithstanding this, it is accepted that the development would result in less than substantial harm to the significance of the existing building. However, this less than substantial harm is diluted by the resulting heritage benefits which include the establishment of a viable and sustainable new use, the repair and conservation of the listed building and the uncovering and reinstatement of lost or previously covered features of the building. As a result, the less than substantial is at the lower end of the scale.
- 16.3 The proposed development will also result in notable sustainability benefits, such as a net reduction in trips generated by all modes of transport and also a 72% reduction in CO2 levels. Given the climate emergency these are important benefits.
- 16.4 Finally, the council is unable to demonstrate a five-year housing land supply, therefore it falls for the development to be determined against the tilted balance set by the Framework. To this end, the only adverse impact identified is the less than substantial harm to the listed building, albeit at the lower end of the scale. This harm is clearly outweighed by the resulting benefits and therefore the proposal constitutes sustainable development and should be granted permission without delay.

Appendix 1 – Mail Merge Consultation Letter

02 October 2024



Crossman Group
1b Mile End
London Road
Bath
BA1 6PT

[mail merge addresss]

Dear Neighbour,

CHRISTCHURCH HALL, 38 PORTLAND STREET, CLIFTON, BRISTOL, BS84JB.

PROPOSED CHANGE OF USE OF CHRISTCHURCH HALL TO 9 FLATS, OFFICE AND ASSOCIATED ALTERATIONS TO THE BUILDING

We are writing to inform you about the emerging plans the Crossman Group have for the future of Christchurch Hall at 38 Portland Street, Clifton. The Crossman Group are seeking to convert the basement and ground floor levels of the building to provide an office hub for both their employees and individuals in the wider community, who on occasion, may require a more formal setting when working from home. Nine apartments are proposed on the upper floors which will enable a viable future for the listed building, supporting its ongoing conservation.

The conversion will maintain and enhance the external appearance of the property, and its internal refurbishment will enable the reinstatement of many heritage features. The property is in a highly sustainable location, with good accessibility to a range of modes of transport and services. The Crossman Group has considered alternative uses at the site including student accommodation and other commercial development, although has decided to progress with this residential and office mixed use proposal.

The consultation material is available to view on our website at:

<https://www.crossmangroup.co.uk/christchurchhall>

Your feedback on the emerging proposals would be welcomed prior to the planning application being submitted to Bristol City Council.

Yours faithfully,

MARK CULLEN BSc MA MRTPI
Associate Planner

Crossman Acquisitions

M - 07833453246

E - mcullen@crossmangroup.co.uk

W - www.crossmangroup.co.uk

Appendix 2 – Public Consultation website.

CHRISTCHURCH HALL PUBLIC CONSULTATION

Introduction

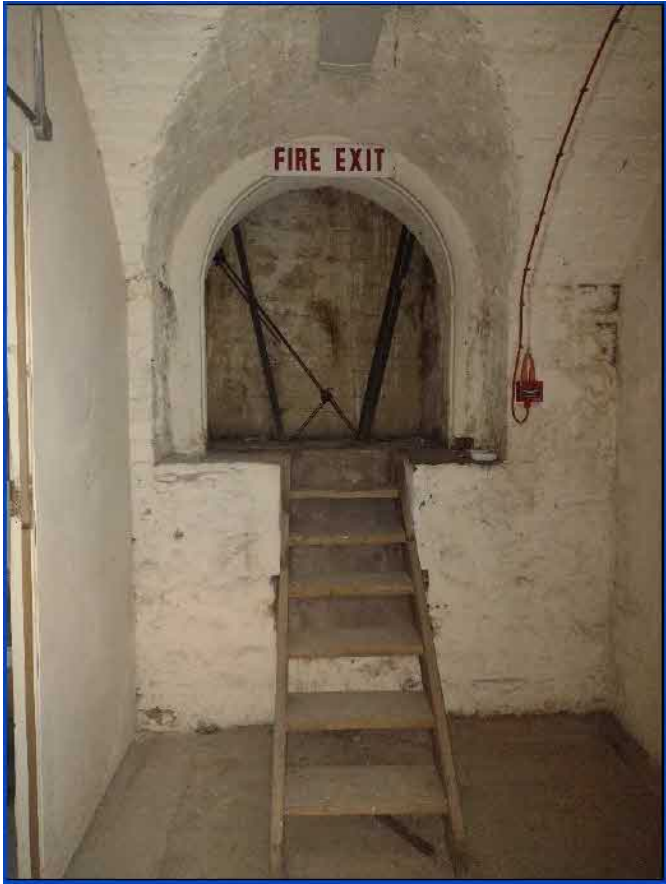
Welcome to the Crossman Group's public consultation in respect of its proposals for the conversion of Christchurch Hall, Portland Street, Clifton.

Historic Context

Christchurch Hall is a Grade II listed building. Originally constructed as a warehouse in circa 1850, the building has since been used as a parish hall, before being purchased by the BBC in 1986 for a recording studio and office space. It is presently occupied by the Bristol Old Vic Theatre School (BOVTS) who use the building for a recording studio, teaching space and offices. The building has seen numerous changes over the years, most specifically when the BBC made significant changes to the building to create the soundproof recording studios. These works also included the installation of a new roof.



Site Photographs



○ ○ ○ ○ ○ ○ ○ ○ ○ ○



Given the various uses of the property, the building has been subject to extensive internal changes. These alterations have been significant, and have resulted in the loss of much of the internal historic fabric, and also the addition of modern features, such as sound proofing internal cladding, and more notable additions such as the replacement roof which was installed in 1986.

The proposed development will be undertaken in a sympathetic way, thereby retaining the remaining historic fabric, and will also seek to reveal those historic features previously hidden by earlier phases of development.

Proposed Development

The internal fit-out of the building is now aged, and no longer meets the needs of the building's current tenants, Bristol Old Vic Theatre School. The theatre school will therefore be vacating the property, and moving to modern, fit for purpose facilities. Given the absence of any credible market interest for a continuation of the property's existing use, the Crossman Group now intends to re-develop the building with a mixed use scheme. The development will comprise of:

- 9 residential apartments:
 - 2 x 1 bed;
 - 4 x 2 beds;
 - 3 x 3 beds.
- 237m2 of office space.

The residential element will deliver a mix of apartment sizes, thereby helping to meet the housing needs of the wider community. The proposed office accommodation will be occupied in part, by the Crossman Group. It is proposed that the remaining office space will be utilised as a 'community office hub', which will provide a hot-

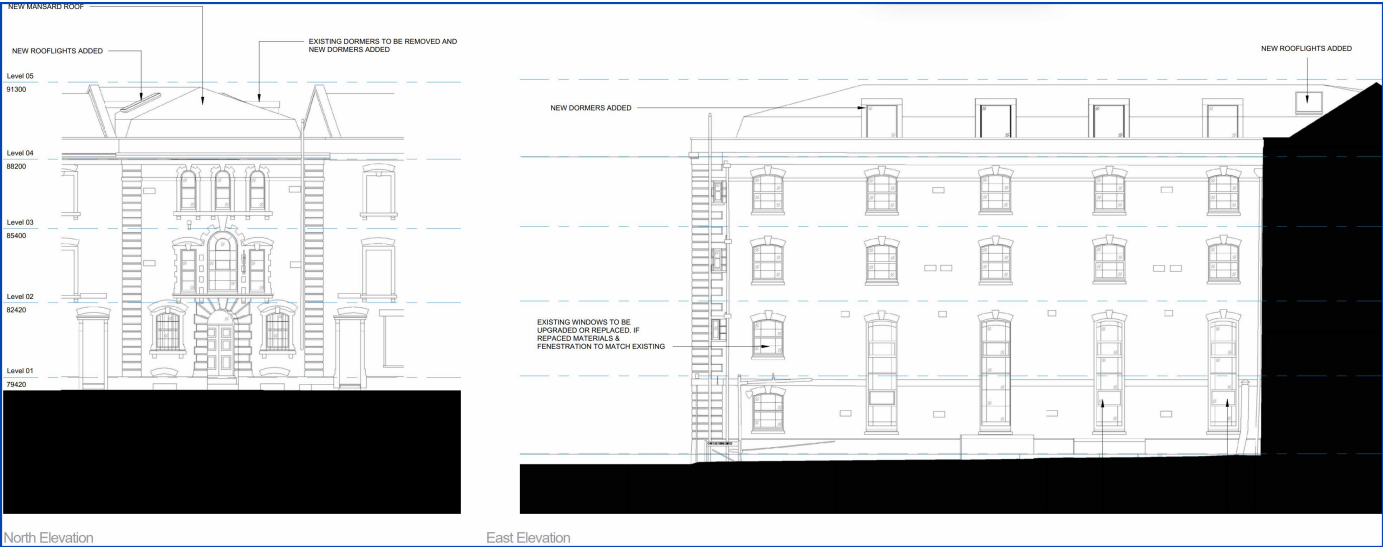


desking service, meeting rooms and associated facilities that can be rented out by those working from home in the local community, who on occasion, require a more formal working environment.

As the property is located in a highly sustainable location, the development will be largely car free. However, two car parking spaces are proposed which will be allocated for ozce use during the day and then re-allocated to the two largest apartments during the evenings and at weekends. Secure cycle parking will be located within the development for 16 cycle spaces. Covered refuse storage will be provided adjacent to the proposed car parking spaces, immediately to the south of Portland Street.

Working with the council's heritage ozcers, the proposed development will seek to better reveal the building's historic fabric. The only external works proposed to the building comprise the re-instatement of previously blocked windows, and also the replacement of the existing roof with a mansard roof.

(CLICK BELOW IMAGES TO ENLARGE)



Benefits of the Development

The following bene|ts would result from the development:

- The delivery of 9 residential apartments at a time when the council are experiencing a critical shortage of housing delivery;
- The ability to provide high quality ozce |oorospace both for the employees of the Crossman Group but also a community ozce hub for local residents;
- The restoration and ongoing conservation of a Grade II listed building;
- The building conversion would achieve a 72.10% reduction in CO2 emissions;
- It would be a predominantly car free development.

Feedback

We would like to hear your thoughts on the principle of the proposed scheme. Your feedback will help inform the next stage of our design before we submit a planning and listed buildings application to Bristol City Council. Once these applications have been submitted, you will be able to view the technical submission and full suite of architectural drawings in more detail.

Please send your comments to mcullen@crossmangroup.co.uk

Thank you,

The Crossman Group

About us

The Crossman Group delivers high-quality sustainable 塀 鋥 development with the aim of maximising value, alongside a dedication to client and customer care

Follow us

Contact us

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Crossman Planning Consultancy

Crossman Planning Consultancy are independent planning consultants in the Bristol area, and South West England.



Appendix 3 – Letter dated 21st May 2024 from Bristol Old Vic Theatre School.

Bristol Old Vic Theatre School

Principal's office
Bristol Old Vic Theatre School
1-3 Downside Road, Clifton
Bristol, BS8 2XF
fiona.francombe@oldvic.ac.uk
+44(0)117 973 3535

Matthew Halstead
Crossman (Portland Street) Ltd
1b Mile End
London Road
Bath
BA1 6PT

21st May 2024

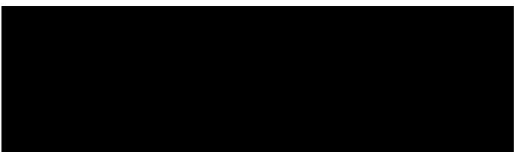
Dear Matthew,

Re: Christchurch Hall, Portland Street, Clifton, Bristol

The above property is currently used for a mixture of commercial and teaching uses linked to the Bristol Old Vic Theatre School, with the latter including a recording studio.

However, the Bristol Old Vic Theatre School no longer has a need for these uses at the property. It is envisaged that at some future date, these uses or similar will be accommodated elsewhere on the Bristol Old Vic Theatre School estate.

Yours sincerely,



Fiona Francombe
Principal & CEO