

# Amendment Sheet

7 December 2022

## Item 1: - Land At Broom Hill/Brislington Meadows Broomhill Road Bristol BS4 4UD

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5	<p>Since publication of the Public Report Pack a total of 2 further comments both in objection have been submitted in relation to this application.</p> <p>In total 585 representations have been received consisting of 6 letters of support, 575 objections and 3 neutral to the development.</p>
10	<p>Since publication of the Public Report Pack an objection has been received from the Campaign to Protect Rural England (CPRE) which states:</p> <p>"This objection is on behalf of CPRE - the countryside charity, Avon &amp; Bristol branch. The author is the branch Director.</p> <p>Mr Dougal Matthews of the Save Brislington Meadows group, showed me and a colleague round this historic, wildlife-rich site, used by so many people for recreation and wellbeing on 20 Sept.</p> <p>CPRE Avon &amp; Bristol objects to the planning application submitted by Homes England to develop Brislington Meadows. Our reasons for objecting include, but are not limited to, the following:</p> <p>Housing targets: councillor for Brislington East, Cllr. Tim Rippington, confirmed that at Bristol City Council's Full Council on 8 November, all four major parties voted unanimously to push back on government, to allow Bristol to set its own targets, based on land identified within the city as suitable for house building. This was also reported in the Bristol Cable . Needing to meet centrally-imposed housing targets could not, therefore, be an excuse for inappropriate development.</p> <p>Local Plan: Following on from this, Brislington Meadows does not appear in the latest draft of Bristol's Local Plan (seen 9 November). We hope this means that city planners recognise the importance of conserving the site as it is.</p> <p>Housing: Bristol City Council's latest Housing Delivery Action Plan (July 2022) states that in 2021 there were 13,508 dwellings with planning permission, or agreed subject to S106. As 1,350 homes were completed in 2019/20 , a large number of homes are still to be built. How, therefore, can any further planning application, especially to build on greenfield, be justifiable or necessary?</p> <p>Housing / brownfield: CPRE has a clear, longstanding Brownfield First policy, and has, by working with partners across England, including Bristol, supported successful implementation of this policy . Bristol City Council's own Brownfield Land Register shows that there are at least 14 brownfield sites in the BS4 postcode with planning permission . This availability of brownfield land in the vicinity of Brislington Meadows suggests strongly that building on this greenfield site is unnecessary.</p> <p>Empty homes: according to data from 2022, Bristol has 1,727 empty homes ; or 1 in 50 of Bristol's homes are currently empty - an increase of 56 per cent from 2021. We are trying to obtain a breakdown by postcode area of these homes, but, meantime, some food for thought: if we divide the 1,727 figure by 34, the number of wards in Bristol, we get a figure of 52, i.e. fifty two empty homes per ward. We do not need to build houses on Brislington</p>

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	<p>Meadows or any other greenfield or greenbelt sites.</p> <p>Ecological emergency: Bristol's One City Ecological Emergency Strategy cites the importance of 'protect[ing] remaining wildlife habitats and car[ing] for them better' as necessary in order to achieve the 30% by 30 target: for a minimum of 30% of land in Bristol to be managed for the benefit of wildlife by 2030. We cite this as counter argument to any developers' intentions or obligations to incorporate wildlife enhancement into developments: leaving wildlife habitats as they are, save for essential management, is better for wildlife than creating new ones.</p> <p>Bristol's Conservation Areas: we have studied these and Brislington Meadows appears to be very close to Area 24 or Avon Valley . We shall try and ascertain whether there are any legal or policy implications here, and suggest it worth exploring the possibility of getting the Conservation Area changed to include the Meadows - we and other stakeholders will investigate this.</p> <p>Finally, we agree with all the reasons for objection published on Save Brislington Meadows' FB page, namely: Flood risk, ecology, traffic, heritage, bomb risk and need for housing. Indeed, we have sought to evidence some of these objections in this statement".</p>
32	<p>Following additional expert witness input, the proposed reasons for refusal have been amended to read as follows:</p> <ol style="list-style-type: none"> <li>1) The proposed development is considered to result in significant harm to biodiversity, for which it provides neither adequate mitigation nor compensation (whether on or off site). The application is therefore considered contrary to the development considerations of allocation BSA1201 of the Site Allocations and Development Management (2014), policy BCS9 of Bristol Development Framework Core strategy (2011) policies SA1, DM17 and DM19 of the Site Allocations and Development Management (2014), and paragraphs 174, 179 and 180a of the NPPF (2021).</li> <li>2) The proposed development fails to retain important hedgerows and trees within the proposal site and is therefore considered contrary to the development considerations of allocation BSA1201 of the Site Allocations and Development Management (2014), policy BCS9 of Bristol Development Framework Core strategy (2011) policies SA1, DM15, DM17 and DM19 of the Site Allocations and Development Management (2014).</li> <li>3) The proposal would lead to the loss and deterioration of Irreplaceable Habitat without either a wholly exceptional reason or a suitable compensation strategy. It is therefore contrary to the development considerations of allocation BSA1201 of the Site Allocations and Development Management (2014), policy BCS9 of Bristol Development Framework Core strategy (2011) policies SA1, DM15, DM17 and DM19 of the Site Allocations and Development Management (2014) and paragraph 180c of the NPPF.</li> <li>4) The proposed development fails to adhere to the landscape and urban design policy considerations by virtue of excessive damage to the existing features on the site. The proposed plans and supporting documents present unsympathetic responses to the natural assets on the site and surrounding context and would prejudice the future design and delivery of an appropriate scheme. The proposal will fail to meet the requirements of the NPPF; policy BCS21 of the Core Strategy 2011; and policies SA1, DM26, DM27, DM28 and BSA1201 of the Site Allocations and Development Management Policies 2014.</li> </ol>

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	<p>5) In the absence of an appropriate agreement under s106 of the Town and Country Planning Act 1990, the proposed development fails to make provision for the following:</p> <ul style="list-style-type: none"> <li>• Affordable Housing,</li> <li>• Ecological Mitigation (including BNG Biodiversity Off Setting),</li> <li>• Financial Contributions towards Fire Hydrants, Public Transport Facilities, amending Traffic Regulation Orders, Tree Planting, Training and Employment Initiatives,</li> <li>• Management and Maintenance of on-site Public Open Space,</li> <li>• Travel Plan Audit Fee and contribution,</li> <li>• Highway works including cycle and pedestrian works though Bonville Trading Estate.</li> </ul> <p>These are required in order to mitigate the impacts of the development. The proposal is therefore contrary to policies BCS10, BCS11 and BCS17 of the Bristol Local Plan: Core Strategy (2011) policies DM15, DM16, DM17, DM19, DM23 of the Bristol Local Plan: Development Management Policies (2014) and the Planning Obligations SPD (Adopted 2012).</p>