

Save Brislington Meadows Group - Objection to HE appeal Case *APP/Z0116/W/22/3308537*

1 Introduction - our group - Save Brislington Meadows

Our group consists of over 800 residents within Brislington and the wider Bristol area, including many who lived for a considerable number years in very close proximity to the land which is the subject of this appeal.

The Group was formed in January 2022 by a core of residents who came together specifically to:

- register their concerns about housing development proposals for the site,
- understand the potential impacts of the housing plan
- unite in registering their objection to a potential loss of the Brislington Meadows as a public amenity space.

Save Brislington Meadows Group has the support of our local community group Greater Brislington Together along with our local elected Councillors plus a wider group of people in the area as evidenced by the 700+ objections to the initial Application on the Council Planning Portal .These objections can be viewed via

<https://bristoltrees.space/Planning/application/RA9YU0DN1CN00?>

More information about our group and the meadows can be found in our linktree

<https://linktr.ee/savebrismeadows>

2 Summary - Statement of Object

Our objection is based on our opinion that the appellant's planning application should be refused on the grounds that it fundamentally fails to meet the following criteria from the National Planning Policy Framework (NPPF)

The [NPPF](#) contains the following policies which set the rules for assessing planning applications:

174. To protect and enhance biodiversity and geodiversity, plans should:

a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity

175. When determining planning applications, local planning authorities should apply the following principles:

a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

NPPF further states:

c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists;

Source : <https://www.hertswildlifetrust.org.uk/blog/wider-landscapes-team/local-wildlife-sites-and-planning-system-explained>

We will set out to demonstrate the current benefits of the site and its surroundings to the local community and identify issues with the provisional plan that generate harms, fail to provide adequate mitigation or compensation or are inadequately described

Furthermore, we consider that the appeal proposal is contrary to the policies contained within the Development Plan.

It is our view that, on the basis of the evidence, the housing development proposal would have a significant ecological impact, including substantial habitat loss. Whilst the applicant may suggest that matters can be addressed through mitigation and off-setting, it is clear that, due to the significant loss of habitat that would result, the

ecological quality of the appeal site would be substantially lower as a consequence of development. This would be contrary to both the development plan and the NPPF.

Our position in relation to the severe ecological impact that would result is supported by the

submissions and responses from Avon Wildlife Trust, Bristol Tree Forum and the Council's Ecologist, along with their landscape and tree officers, and many others.

In the face of this overwhelming evidence, we are of the view that Homes England's attempts to

mitigate the ecological impact of the proposed development is flawed and would therefore fail to

meet the requirements of the Development Plan and the NPPF.

The masterplan shows the loss of a substantial amount of existing hedgerows and trees. These

features are fundamental to the ecological importance of the site. Some are potentially considered to be ancient. Whilst these details may only be illustrative at this stage, it is our view that the approach of Homes England to the development of the site has failed to properly account for the retention and protection of these important features.

We submit that, until it can be demonstrated that the site can be developed without having an adverse effect upon the biodiversity quality of the site, including the retention of identified important landscape features, the Inspector should be withholding planning permission. Such requirements are part of the conditions attached to Policy BSA1201, with which, for these reasons alone, the proposal fails to comply.

Furthermore, whilst we acknowledge that limited weight can be attributed to the emerging Local

Plan, the Inspector is asked to note the direction of travel for the document which is to propose the DE-ALLOCATION of the site for development. A key reason regarding this is the Council's declaration of an ecological emergency, along with a change in policy approach that is seeking to bring forward under-used brownfield land within the City, especially in locations where higher densities can be achieved.

The Inspector is also asked to note the age of the development plan allocation, which predates the most recent NPPF. It is our view that the proposed development would deliver only very limited benefits that would not outweigh this policy conflict.

Even if the Inspector might conclude that the Council do not have a 5 year supply of housing land, the impact upon identified ecology, trees and landscape features,

amongst other things, significantly and demonstrably outweigh the limited benefits that building housing on this important greenfield site would deliver.

We are also of the view that a number of the “benefits” put forward by the applicant, such as affordable housing, should NOT be viewed as benefits as they are essentially a basic requirement of the Development Plan, which the proposal is required to deliver. Therefore in the overall planning balance, such local plan requirements should be given neutral weight.

In summary, we consider that the proposed development is contrary to the aims and objectives of the development plan and the NPPF. The appeal proposal contains no other considerations that outweigh this conflict. Even if the Inspector considers that the ‘Tilted Balance’ is engaged, the identified harm significant and demonstrably outweighs the limited benefits that the appeal proposal would deliver. **As a result, we submit that the appeal should be dismissed.**

Issue of Concern of Harm: We know there are gaps and issues with the existing PROVISIONAL plan: IF outline planning is granted Homes England will sell the land on to a developer who will then produce final plans. The current plan fails to define and constrain the future developers actions on the issues raised in this document

Where possible to keep this document compact we will reference external sources - printed versions can be supplied if required

3 Reasons to object

3.1 The climate emergency

Bristol was the first UK city to declare a [climate emergency](#) in November 2018. along? with [Avon Wildlife Trust](#) The City has pledged to:

Protect 30% of land managed for Nature
 Engage 25% of the population in taking action for wildlife
 Increase tree canopy cover by 50% by 2050

Foreword | 2020-2030: The decade we save our wildlife together | How Avon Wildlife Trust is supporting nature's recovery | Making a difference | Nature's recovery | Empowering people | Nature-based solutions | Saving nature benefits people | Ensuring nature is for everyone | Enabling actions | Bringing wildlife back

Making a difference

The natural world needs all kinds of help to thrive. To help us focus, we have identified three priority areas for our organisation to work on.

Nature's recovery



Protecting, creating and connecting wilder landscapes where wildlife and people thrive

Protecting
Creating
Connecting

by 2030 we want to see:

30%
of land and sea managed for the benefit of wildlife

We need to make more space for nature to give our struggling wildlife the chance to recover. We'll create, connect and restore a diverse range of abundantly wild places and form thriving nature recovery networks across the region.

Empowering people



Inspiring and resourcing people to take action for wildlife

Inspiring
Resourcing

by 2030 we want to see:

1 in 4
people taking action for wildlife

The science shows that if just one person in every four takes action for wildlife, this can be enough to change the minds and behaviour of the majority, which will help to put nature into recovery.



Nature-based solutions

Unlocking Nature to tackle the climate crisis

We want to restore and create good quality habitat to draw down carbon dioxide from the atmosphere, reduce local flooding and pollution while promoting an abundance of biodiversity across our region.

by 2030 we want to see:

1,000 hectares
of habitat restored to provide nature-based solutions

© SUSIE PEARCE

The wildlife Trusts , National Trust and RSPB organisations among other are calling for greater protections and more action to protect wildlife
<https://www.rspb.org.uk/our-work/rspb-news/rspb-news-stories/attack-on-nature-the-story-so-far/>

In 2020, Bristol partners came together to declare an ecological emergency. Our city's wildlife, ecosystems and habitats are vitally important to us all, as the loss of biodiversity affects our lives in many ways, from the insects that pollinate our food to the green spaces that enhance our resident's health and wellbeing.

The Ecological Emergency strategy document from the [Nature Recovery Network](https://www.bnhc.org.uk/ecological-emergency/wp-content/uploads/2021/07/One-City-Ecological-Emergency-Strategy.pdf)
<https://www.bnhc.org.uk/ecological-emergency/wp-content/uploads/2021/07/One-City-Ecological-Emergency-Strategy.pdf>

Brislington Meadows is a Site of Nature Conservation Interest SNCI and is an

historic meadowland. This means it is in a category of rarity within just 3% of UK habitat and recognised as increasingly threatened.

<https://group.rspb.org.uk/bristol/news-blogs/blog/the-battle-to-save-brislington-meadows/>

3.2 The Environment Act 2021 – a turning point for Nature

In England, November 2021 also saw the very welcome addition to the statute book of a new Environment Act, the most ground-breaking piece of environmental legislation in many years. For the first time this Act will set clear statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water and waste, and includes an important new target to reverse the decline in species abundance by the end of 2030. It sets in law new tools that Natural England and others can use to help meet those targets, which will at last enable us to lift the grim graphs of species decline upward towards a Nature-positive 2030.

A new general condition is added to the Town and Country Planning Act so that planning permission in England requires a biodiversity gain plan to be submitted and approved. Public Authority Duties: the Natural Environment and Rural Communities Act is amended to make it more explicit that public authorities in England must take action to conserve and enhance biodiversity (Source <https://thecompliancepeople.co.uk/updates/legal/the-environment-act-2021/>)

<https://naturalengland.blog.gov.uk/2021/11/23/the-environment-act-2021-a-turning-point-for-nature/>

3.3 Homes for People and Wildlife

As a region, as in the rest of the UK, we stand at a critical junction in the history of our built environment and its relationship with wildlife. The Government has committed to building a further 300,000 homes a year until 2022, and across Avon the target is for 110,000 to be built over the next 20 years. Meeting these targets, whilst protecting wildlife, habitats and landscapes, will inevitably involve some very difficult decisions. Maybe leave this out?

On a local level we don't have the resources to be able to respond to all the planning applications that are put forward across our region but we want to support you to do this where there is a strong case. On a national level we support the work of The Wildlife Trusts who are lobbying the Government to put nature at the heart of the planning process with their Wildbelt initiative.

<https://www.avonwildlifetrust.org.uk/what-we-do/how-we-manage-natural-landscapes/wildlife-planning-and-development>

This site might have been earmarked for development in past local plans, this was 2014. We now face straight down the barrel of an ecological and climate crisis, and I cannot imagine a site with the amount of biodiversity that the Brislington Meadows has would be retained in a new local plan. (We have received confirmation Monday 28th November 2022 that the site is to be removed from the next local plan) This housing development proposal also goes against Bristol's commitment to tackle the ecological emergency and to ensure that 30% of the land in Bristol is kept for the benefit of wildlife by 2030.

3.4 What would people lose if Brislington Meadows were developed

To enable everyone to understand the history and value of Brislington Meadows to its community, our Group has been asking local residents and people in the wider area to share their knowledge and personal memories about the space. It is evident from the material that has been contributed to us to date that Brislington Meadows provides an essential public amenity: it is used as meeting place, as a space for leisure, relaxation and exercise, for walking, as a safe offroad travel to school route for children young people and families, for enjoyment of seeing wildlife and flora foraging and brings mental / physical health benefits

https://greaterbrislington.org/2022/11/meadows_memories/

3.5 HEALTH & WELLBEING

Nicola Beech cabinet member has said "In Bristol we are fortunate to have many green spaces and wildlife areas that we enjoy and make us healthier and happier. Globally, nationally and locally nature is collapsing at an alarming rate and an unprecedented rate - there has been a decline of 96% in the swift and starling populations". Avon Wildlife Trust promote the benefits of nature as evidence shows it improves our health, makes us happier, more productive and more active. Green exercise can save the NHS money and green neighbourhoods cut depression. Eco therapy could reduce antidepressant

prescription costs and MIND has shown that green exercise benefits health and wellbeing. We know daily contact with nature is linked to reduced levels of chronic stress, reduction in obesity and improved concentration. Ian Barrett CEO of AWT said the meadows were "too ecologically important to be destroyed" when The Mayor made his declaration in April 2021 to save them from development.

Many locals use it for commuting dog walking walking for health both physical and mental recreation and engagement in nature through green bathing wildlife spotting foraging etc

We have local doctors prescribing walks including the Meadows as a venue

our local community group has a dedicated walking route covering the Meadows
<https://greaterbrislinton.org/greentrail/>

And other local walking groups regularly arrange walks through the local area including the Meadows, for example, see the following references:

Bs4 wellbeing walks <https://www.facebook.com/groups/wellbeingwalks>

<https://travelwest.info/walk/walking-for-health?>

<http://outdoorswest.org.uk/Home/what-to-do/join-a-health-walk?>

<https://www.facebook.com/groups/223891986148385/>

4 The Meadows provides

4.1 a carbon sink

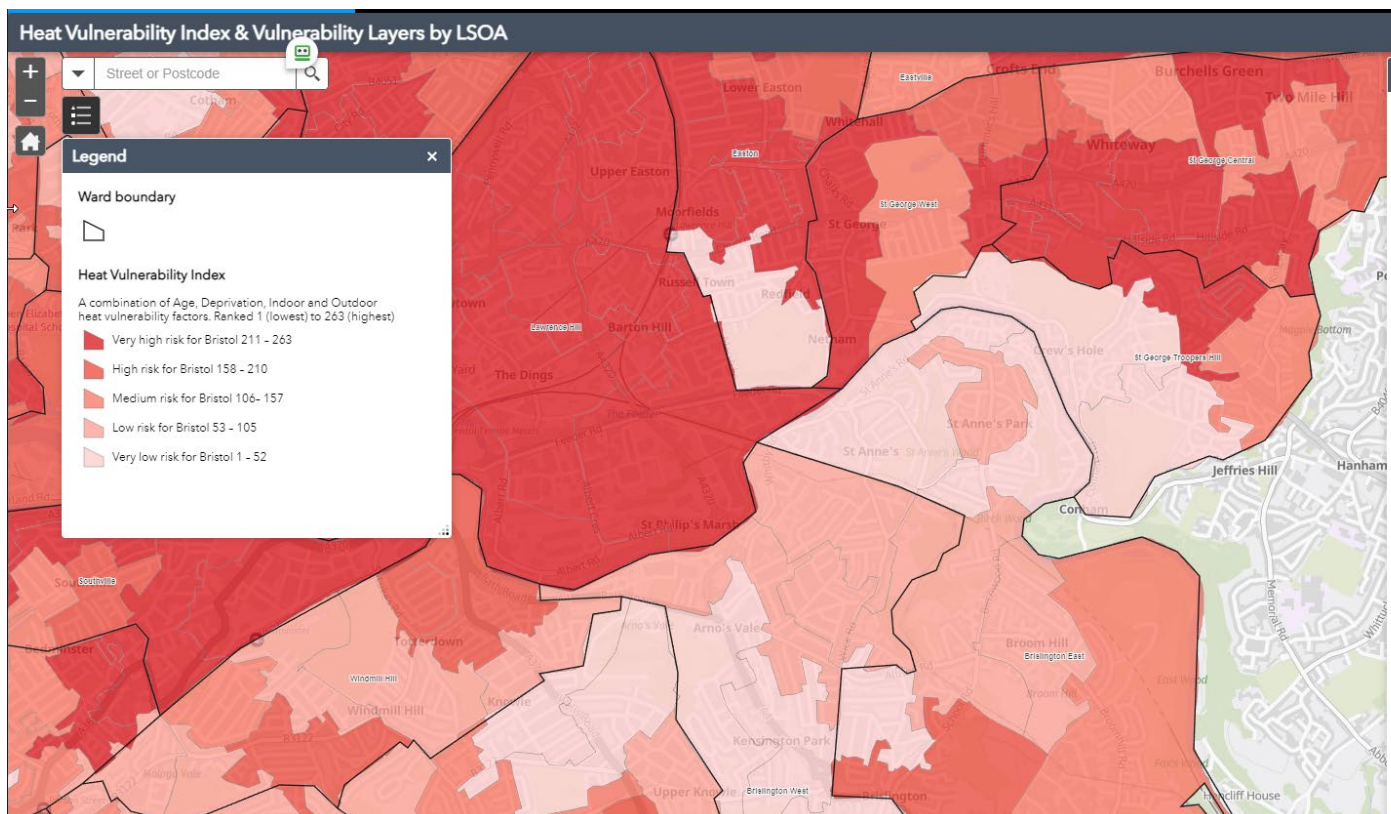
as meadows land sequesters more carbon than woodland

<https://www.newscientist.com/article/mg25133581-000-meadows-could-be-our-secret-weapon-in-the-fight-against-climate-change/>

4.2 a reducer of pollution and noise barrier

The main arterial route from the the A4 into south Bristol is already heavily congested and getting worse as our bus service continues to deteriorate further

The A4 between Bristol and Bath is a critical route, connecting local communities and connecting communities from elsewhere in the region to our major cities.



In cities, people and the built environment, such as roads, homes, or offices, are exposed to higher temperatures than in rural locations.

Using the Keep Bristol Cool mapping tool <https://www.bristol.gov.uk/council-and-mayor/policies-plans-and-strategies/the-keep-bristol-cool-mapping-tool?>

we can see that the Area surrounding the meadows is already in the **Medium risk category**:

building on the land will only make it less resilient to heat stress and increase the local risk

5 Heritage

***Heritage** Ancient Meadowland hedgerows date back to 1780 or before possible site of Roman Glassworks – plan has insufficient information to assess impact of development on this site*

https://www.brislington.org/library/sites/brislington_meadows.html

In recognition of the lack of readily available information on some aspects of the site, we're hosting information on a variety of related topics by local author Ken Taylor

https://www.brislington.org/library/sites/brislington_meadows.html

Naturally, the museum has an active role in preserving the legacy of the past - be they stories, artefacts or places of local interest - but these articles are presented impartially to help inform debate about the future of Brislington Meadows.

6 Democracy

In terms of the overwhelming volume of local objections to the development, if there were to be a decision granting planning on appeal, it would deny the democratically expressed will of the people of Brislington and Bristol and their elected leaders

We say no

Councillors say no

Mayor says no

Metro mayor says no

Planning dept says no

<https://www.bristolworld.com/news/brislington-meadows-campaigners-accuse-government-of-sidestepping-democracy-as-appeal-made-against-council-3897431>

7 Local housing supply

Any Potential “benefits” from this development are not unique and given the scale of other local development - are not significant in addressing stocks of affordable homes or demand for new houses at market value

There are 13500+ potential houses in Bristol that have been granted planning permission but remain unbuilt a number that’s increased by 3500+ since 2019

<https://greaterbrislington.org/development-in-brislington/>

There are plans for approx 3500 houses in brislington East / West may / are already being built or advanced in the planning process

Whilst historically the council has struggled to meet targets this has changed in recent years <https://twitter.com/LabourBristol/status/1592206076656906240>

2,563 new homes built last year alone

Including the highest number of affordable homes built for twelve years

With 90% of them going on brownfield land - saving greenspace for nature.

There are an additional 13,000 homes planned in south bristol however this leads to:

7.1 New homes, not enough resources

South Bristol's GPs and schools won't cope with 12,000 new homes claims MP

"Someone needs to own the problem" said Karin Smyth

[bristolpost.co.uk/news/bristol -news/south -bristols -gps-schools-wont-7138321?](https://www.bristolpost.co.uk/news/bristol-news/south-bristols-gps-schools-wont-7138321?)

<https://www.bristolpost.co.uk/news/bristol -news/bedminster -green-numbers-5-plots-7413363>

We Don't Have the:

- **Doctors**
- **Dentists**
- **Public Transport**
- **Schools**
- **Roads**
- **parking**
- **Air quality**

to cope with all the extra people the proposed developments will bring to Brislington specifically or South Bristol generally

7.2 The Challenge

The challenge for our Mayor , the Developers , the council and our other authorities

is how to provide the additional resources needed by the increase in population for the benefit of all the residents of Brislington south Bristol and the wider population of Bristol

Housing Delivery Test Action Plan

The Housing Delivery Test Action Plan which explains how we plan to create new homes in Bristol.

<https://www.bristol.gov.uk/business/planning-and-building-regulations-for-business/planning-for-business/housing-delivery-test-action-plan#:~:text=The%20Housing%20Delivery%20Test%20Action%20Plan%20has%20been%20produced%20in,of%20homes%20in%20the%20city.>

*data from the council's ward Reports [Brislington East Ward Report](#) & [Brislington West Ward Report](#) additional Data can be found for [Brislington East](#) & [Brislington West](#)

Have your say on the local plan

<https://www.bristol.gov.uk/residents/planning-and-building-regulations/planning-policy-and-guidance/local-plan>

and some valuable commentary from a local housing activist

<https://mobile.twitter.com/DanicaPriest/status/1572266669627809793>

8 Harms

8.1 Population increase vs resources

We saw a 5% population uplift between the 2011 census and 2021 the Meadows development on its own will increase the population of Brislington east by a further 5% but we don't have any corresponding increase in resources

Doctors, Dentist, school provision etc remain fixed.

Public transport has decreased and is still declining.

Roads are increasingly congested both with traffic and parking is a massive issue locally with increasing antisocial pavement parking blocked roads for emergency vehicles etc

8.2 FLOOD RISK

The area around the bottom of School Road is already prone to flooding, the Brislington Brook flows nearby and a stream through the meadows runs off through a storm drain near the entrance of the park. The four homes that were recently built on the site of the former Buglers Coach Depot had their ground footings submerged in water for a long time until a suitable solution was found. The loss of green space available to absorb rain water along with the increase in paving & tarmac would significantly contribute to the risk of flooding. We know that many urban areas are now at higher risk of flooding due to front gardens being paved for parking. Brislington Village and surrounding areas suffered severe flooding back in 1968 which is well documented in local records.

All flood mitigation flows out to the Culvert in Victory Park. This is already prone to flooding over school Rd and Down Jean Rd into Brislington Brook which is Identified Nationally as "at Risk" of flooding a mistake here could subject hundreds of home in the valley to increased flood risk the 1968 Floods were caused by one big summer storm and with climate change such freak events are becoming more common so the potential to overwhelm the SUDS scheme will increase with time

It is essential avoid an increase in the downstream, off site flood risk. This is important since there have been flooding problems on the lower levels Victory Park that flow over onto School Road. Confirmation from Wessex Water that the proposed sewer connections are acceptable will be required. As will the confirmation from BCC Parks team concerning the outlet to the drainage ditch. We await the detailed design of the drainage strategy for further review in due course.

https://pa.bristol.gov.uk/online-applications/files/FABB1A732EC26AB5789CB3A2D833593C/pdf/22_01878_P-FLOOD_RISK-3226470.pdf

The CEO of Anglian Water, Peter Simpson, said the government had not acted to make sure homes were built sustainably, with the sewage system taken into account. “If water companies were made statutory consultees on planning developments, not just local plans, and if schedule 3 of the Flood and Water Management Act were enacted, then our role in ensuring sustainable growth would be greatly enhanced.”

The CEO of Thames Water, Sarah Bentley, called for regulations on drainage in new developments. “The biggest single driver of discharge of untreated sewage into the environment is excess rainfall coming through our sewage treatment works, overwhelming them. By choosing to enact schedule 3 of the Flood and Water Management Act 2010 government can significantly reduce the rate of surface water discharging to our network, meaning more available capacity for new connections for new development and a lower risk of spills from combined sewer overflows.”

<https://www.theguardian.com/environment/2022/nov/26/water-chiefs-blame-uk-government-for-failure-to-stop-sewage-pollution>

8.3 TRAFFIC AND HIGHWAY SAFETY

There would be a substantial increase in traffic in the area which would have an impact on highway safety especially on Broomhill Rd which is the sole access/exit point for the 260 homes. This would mean in excess of 400 vehicles using this road and causing further congestion throughout all of Brislington and junctions with the very busy A4 Bath Road.

Broomhill Road is used by families and school children and students making their way to the local nurseries, primary schools, secondary school and college, the pavements are not very wide in places and as it is mainly a straight road cars frequently speed along it. Air pollution, fumes and increased traffic would make more people use their cars at a time when more people especially schoolchildren/students are being encouraged to walk.

Bonville Road is the planned access route for construction traffic for UP TO 5 YEARS, this road is narrow and completely unsuitable and will bring the whole Trading Estate to a standstill, it can only just about accommodate one HGV at a time in one direction. Frequently lorries have to make awkward manoeuvres and have to wait in the area to make timed deliveries, any businesses you speak to now say it is already a nightmare. It is also used by many workers to park their cars, (20 along the stretch adjacent to the meadows) and also a busy walking route through to the A4 Bath Road which will become very hazardous for pedestrians. Due to restricted access and parking spaces on the site it is likely parking will overspill to neighbouring roads in the area, eg School Rd, Belroyal Ave, Bonville & Broomhill Rd due to a bottle neck being created to exit, some homes would be nearer these roads and find it easier to park there and use the footpaths to reach their homes, causing more congestion and parking issues in the locality.

Traffic congestion Brislington has the unenviable title of one of the worst congestion areas in Bristol. And Broomhill Road is a terrible bottleneck at peak times. The traffic backs back from McDonalds on the Bath Road right back down to Ironmould Lane. Along with that you get bad air quality which will increase quite significantly with all the extra traffic exiting on to Broomhill Road, you would make a bad situation terrible. To plan the site to encourage residents to cycle to work is being optimistic in the extreme, plus the number 1 bus service has got to be one of the most unreliable in Bristol !

As our roads are often used as a cut through / rat run for vehicles trying to escape the congestion on the A4 we are seeing increasing numbers of road issue from crashes pollution the transit of HGVS through the 7.5T limit etc <https://greaterbrislington.org/road-safety/> the extra traffic has resulted in some significant accidents on Broomhill Road



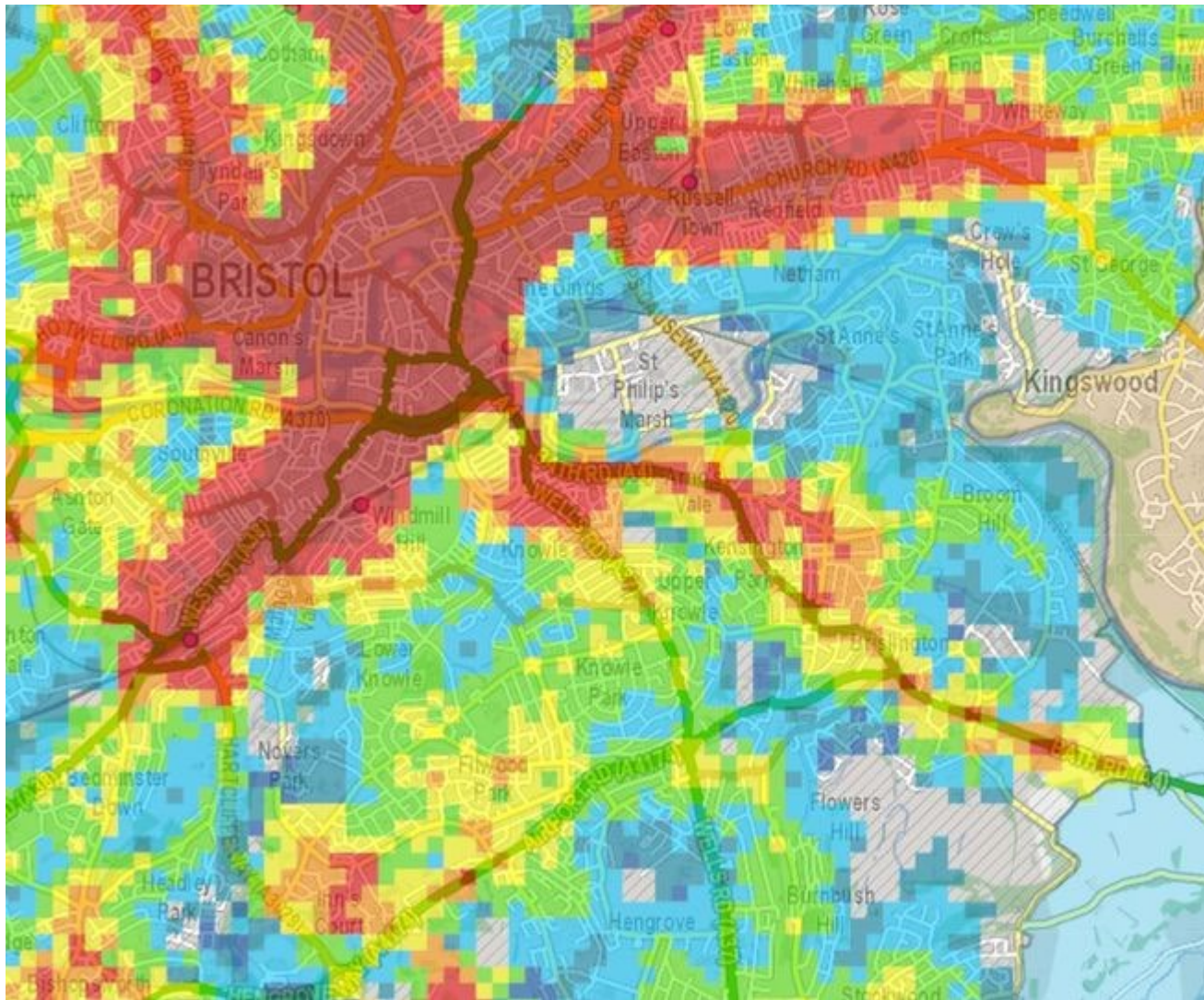
Traffic

Broomhill road is extremely busy and already gets congested by MacDonald's queuing onto the A4 Bath Rd and the mini roundabout at the top of school Rd travelling into Brislington 260 Homes leading form a cul-de-sac into Broomhill Rd can ONLY make this worse

-Traffic Surveys were done during lockdown/taken from 2011 DATA, the transport plan was written before the changes to local bus services earlier in the year and the latest [bus cancellations](#)

Brislington is one of the parts of the city most poorly served by public transport – this was acknowledged by the Council and WECA in the 2021 submission to government for funds to help reopen St Anne's railway station. That report stated:

"The area is currently poorly served by public transport...despite its large population (approx. 10,000). Existing public transport connectivity to the St Anne's area is extremely limited for both bus and rail transport provision. Bristol Transport Access Level (BrisTAL) is a measure of public transport connectivity within the City of Bristol, showing the density of public transport services and stops, by combining the walk time to the stops, the number of stops and the frequency of services. It includes bus (including Metrobus) and rail services for its calculations. Figure 2 12 shows an extract of the most recent BrisTAL mapping (June 2021), which includes the extent of the study area." (see picture - blue = poor, red = good)



8.4 Loss of HEALTH & WELLBEING amenity

Brislington Meadows provides quarter of a million pounds worth of social and health values each year as calculated by the University of Exeter Outdoor Recreation Valuation Tool (ORVal) which is part funded by Defra www.leep.exeter.ac.uk/orval/

8.5 Bomb Risk

The site was bombed heavily during the war and is classed as "high Risk" this bomb was dropped on Exeter only a few weeks after Brislington was bombed

<https://www.bbc.co.uk/news/uk-england-devon-56236381> this could happen on the

meadows and is a very real concern for local residents (some of whom lived through the original bombing raid)

Home England have conducted bomb risk surveys to show that the site is " High Risk" as it was bombed during the war not all of the site has been surveyed and not all of the identified targets have been checked and proven to be low risk

8.6 Need for Housing

Whilst acknowledging the pressures to build more housing and the fact is that many other brownfields sites are being developed with more than 13,000 homes in south Bristol planned or in planning https://greaterbristolington.org/development_in_bristolington/ . Our group takes the view that the Meadows proposal for 70 affordable houses is an insignificant contribution compared with the harms of development on that site.