

**James Clark**

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**From:** Lucy Aspden [REDACTED]  
**Sent:** 21 February 2023 17:51  
**To:** Rob Hawkins; [REDACTED]  
[REDACTED]  
**Cc:** [REDACTED];  
[REDACTED];  
[REDACTED]; Dougal Matthews; Paul Connelly  
**Subject:** RE: Public inquiry for land at Broom Hill/Brislington Meadows, Planning  
Inspectorate reference: APP/Z0116/W/22/3308537

All

The Appellant acknowledges the email below from Friends of Victory Park ("FVP"). We will be guided by the Inspector as to the extent to which he requires a response. Without prejudice to any further submissions requested or made, we note the following matters at this stage in response:

1. The document referred to is Mr Hesketh's rebuttal proof of evidence. This was provided in the normal way and in accordance with the timetable set by the Inspector.
2. There was no requirement, whether under statute or at common law, for FVP to be consulted on Mr Hesketh's rebuttal proof of evidence. Insofar as FVP wish to make representations on Mr Hesketh's rebuttal proof of evidence, Homes England has no objection to those representations being made when the Inquiry resumes.
3. The material in Mr Hesketh's rebuttal proof of evidence demonstrates the feasibility of off site BNG mitigation at Victory Park (alongside the feasibility of other measures such as through offsetting partners etc) to achieve the 10% BNG. Any BNG mitigation within Victory Park would not result in the loss of any usable playing field space, it would enhance the nature value of parts of the site and it would not affect people's enjoyment of this important space. As per the allocation policy, the BNG would also be delivered in the grazing land that lies between the publicly accessible parts of Victory Park and the Appeal Site. A full BNG Strategy detailing the exact mitigation proposed (including any off site measures) will be secured by planning condition. At condition stage the information would be subject to formal consultation and approval.
4. Given the foregoing and in light of Mr Hesketh's evidence, there is no reason to consider that the proposed BNG is not feasible or would be unworkable as alleged by FVP.
5. We note that the Council, who have ultimate responsibility for Victory Park, has not raised any of the concerns in FVP's email. This confirms Homes England's position as set out above and in evidence.

Kind regards

Lucy

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**From:** Rob Hawkins <[REDACTED]>  
**Sent:** Sunday, February 19, 2023 6:56 PM  
**To:** Jo [REDACTED] uk; [REDACTED]  
**Cc:** [REDACTED]; Lucy

Aspden <[REDACTED]>; [REDACTED]; [REDACTED]; Dougal Matthews <[REDACTED]>

**Subject:** Public inquiry for land at Broom Hill/Brislington Meadows, Planning Inspectorate reference: APP/Z0116/W/22/3308537

For the attention of the inspector re Planning Inspectorate reference: APP/Z0116/W/22/3308537,

I am writing on behalf of the Friends of Victory Park, Brislington, Bristol.

Victory Park was donated by Cooke-Hurle in 1920 to celebrate peace after the First World War, its purpose for the recreation of the local population.

Today it is a wonderful open space, with a wealth of natural heritage, a popular playground, and three football pitches. Victory Park is used by local residents, dog walkers, runners, footballers, walking groups, local schools and scout groups

The Friends of Victory Park want to get more people using the park and enjoying it for what it is - a beautiful open space.

We have been following the inquiry into the Brislington Meadows development application with a close interest and were surprised to see Homes England present a report previously not included with the initial application, including using Victory Park as part of the BNG off setting delivery.

<https://www.bristol.gov.uk/files/documents/5908-cd16-8-ecology-rebuttal-mr-fran-hesketh/file>

At no point have we been consulted on this proposal. As a key stakeholder, this is unacceptable. We have major concerns with this solution for several reasons.

As set out above, the park is for the recreation of local people. The majority of the park is set over to sports fields for this purpose, but it is not the only recreation use. Many dog walkers use the area outlined for 'improvement', the only area where dogs are able to run free when football matches are underway. Removing this area for that activity would be detrimental to the use of the park for many. The park is used by many for a diverse number of activities; picnicking and barbecues, exercise, sitting and relaxing in open space. It is a community space for the local people including our newly planted community orchard and our well loved children's play area which often sees its users playing on the very slope under consideration for enhancement.

In order to carry out the works mentioned, it is assumed that this area would need to be fenced off, removing it from general use. This would not be in line with the ethos of our park. Reducing access to a part of the park as a requirement forced by the a proposed neighbouring development would be seen as the community losing part of their park which goes against, not only the history of the park, but planning.

If it were not fenced off, the enhancements would simply fail. The grassland type being suggested require nutrient poor soil types - the inputs from dog use would simply be too high.

Yours sincerely,

Dr Rob Hawkins

Friends of Victory Park