



Bristol Parks Forum

representing resident led park groups and citywide organisations involved in protecting and improving Bristol's green spaces

Statement to Cabinet Meeting on 1st November 2016

Development of Land at Broomhill Road Brislington

from Bristol Parks Forum Committee

Summary

Bristol Parks Forum Committee calls on the Mayor & Cabinet to reject the recommendations in the report before them and to call for a revised report to be prepared to be considered at a later meeting.

It is our view that:

- 1) The current report is deficient in that it does not consider the planning implications of the proposals and does not highlight the risk that this poses to the viability and deliverability of the development as proposed.
- 2) The current report is misleading in suggesting that the use of BCC P&GSS land is required to provide access to the site, when there is a long frontage to Bonville Road.
- 3) That there should be an extensive public consultation on the proposed sale of plots 1 & 3 before any decision on the sale of this 'P&GSS land' is taken.

In addition we object in principle to development on any land designated as Important Open Space or a Site of Nature Conservation Interest.

Our reasoning and concerns are set out in full below.

Housing need and principle of development on Brislington Meadows

Bristol Parks Forum is aware of the need to increase the housing supply in Bristol and in particular affordable housing; the committee agrees that urgent action needs to be taken to address this shortage.

While we know that many members of the groups that belong to the Parks Forum will be against the development on the land at Brislington Meadows which is a green field site; as a committee we accept that this land was designated for housing in the Local Plan as site BSA 1201. The Local Plan was adopted by Full Council after a long period of consultation and public hearings by a Government Planning Inspector. We believe that the allocations in the Local Plan should be followed and are not therefore objecting to the development of this land (the area marked in blue and plot 4 on the Appendix 1 map).

Access route over allotment land

As described in para 5 of the report, The Local Plan Policies Map shows an indicative access route from School Road through allotment land. We welcome the fact that the report rejects the use of this as an access route; though we are disappointed that the reasons for rejection are due to the risk of delay rather than the Council rejecting development on food growing land in principle.

The need for an alternative access

The report states at para 6 that four alternatives for access have been considered and these are listed at paras 7 to 10. Having looked at the map and knowing the site we fail to understand why the report does not say anything about access being provided from Bonville Road (where an access track already exists). Given the long frontage that the site owned by O&H has on this road, why is additional land necessary to provide access?

If there is good reason why a direct access from Bonville Road is not possible then this should have been set out in the report.

Access through plot 4

In para 8 and the equalities assessment state that plot 4 is unsuitable for disabled access due to the steep slope on School Road. We do not believe that this is based on proper reasoning. In considering the alternatives for access then the report is clearly looking at vehicular access.

Clearly for access by motor vehicle there is no equality issue. If the site is properly designed then it would be possible and indeed desirable to provide separate access routes for pedestrians (of all abilities), cyclists and wheelchair users from those used by motor vehicles. These could be provided through plots 1 & 3 (and indeed through the allotments) on the existing PRowS and by constructing new paths without the need for the P&GSS land to be sold.

The only legitimate reason for not providing an access through plot 4 appears therefore to be financial and the Council should not attempt to hide behind an equalities assessment in this regard.

Sale of P&GSS land

At para 3 the report refers to the Cabinet decisions taken in 2010 & 2012 on the sale of land covered by the Parks & Green Spaces Strategy ('P&GSS land'). This strategy was adopted by Cabinet in February 2008. The consultation on the disposal of sites then started in June 2010 and the final decision to retain these two spaces was taken by Brislington Councillors at the Neighbourhood Partnership meeting in June 2012. In effect there was two years of consultation on these proposals. Cabinet members will no doubt remember that there was considerable controversy over the proposals. Links to some of the coverage in the Evening Post (as it then was) remain on our website at

www.bristolparksforum.org.uk/information/pgss_wp

While we did not expect that the decision to retain this land (and the other sites around the city) would never be overturned, we were informed that it would be honoured for at least the period for which the current Local Plan was valid. Consultation on the Local Plan was concurrent with that on the P&GSS and the report to the meeting that considered disposal of these sites stated:

“If sites are not declared surplus, and still required for recreational purposes, it is expected they will be designated as Important Open Space in the Site Allocations and Development Management, Development Plan Document (DPD)”

The two sites now proposed for development were so designated (see below on the implication of this designation). It is clear then that the Councillors making the decisions and the residents involved in the consultation considered that this was a long term decision and

were made aware of the consequences. Certainly everyone involved in the process expected the decision to stand for a period of longer than four years.

Given the level of previous consultation and residents feeling of ownership of the decision through the consultation and the Neighbourhood Partnership we feel it is wholly wrong for Cabinet to now overturn that decision without any public consultation and with the proposal only coming into the public domain one week before the decision is taken.

We are concerned also that the proposed disposal of these sites indicates an intention to reconsider the disposal of other P&GSS land. We would urge the Mayor to make a clear statement of the Council's position on this matter.

Planning Considerations

This is a major omission from the report and the risk assessment.

Examination of the Local Plan policies map clearly shows that both plot 1 and plot 3 are designated as 'Important Open Space' and as such covered by policies BCS9 & DM17. In addition plot 3 is designated as a 'Site of Nature Conservation Interest' (SNCI) and therefore additionally covered by policy DM19.

Inclusion of these plots in the development proposals would therefore mean that these policies would have to be considered in the approval of any planning application that came forward.

We object in principle to development on any land designated as Important Open Space.

Development Management Policy DM17 is very clear:

"Development on part, or all, of an Important Open Space as designated on the Policies Map will not be permitted unless the development is ancillary to the open space use."

It adds at clause 2.17.3:

"Important open spaces with a role and value for recreation, leisure, community use, townscape, landscape or visual amenity quality are designated and shown on the Policies Map and protected from development."

Since the Bristol Site Allocations and Development Management Policies section of the local plan was adopted by Full Council in July 2014 we know of at least two applications that have

been turned down on the basis that they are ‘Important Open Space’. The most recent was application ref 15/01870/F for land in Stapleton.

The first reason given for refusal stated:

“The proposed housing development will result in the loss of part of an Important Open Space and it would not be ancillary to the open space. The proposal would conflict with Bristol Core Strategy Policy BCS 9 (adopted June 2011) and Policy DM17 of the Site Allocations and Development Management Policies (adopted July 2014).”

The Planning Officer’s report to the Development Control Committee stated:

“The wording of Policy DM17 is unequivocal. The proposed housing cannot be described as being ancillary to the open space use and therefore there is a clear conflict with planning policy. Accordingly, the development is considered contrary to national and local plan policy. The principle of residential development on this site is unacceptable.”

In our view any planning application for development of the site that included plots 1 & 3 should therefore be refused as long as the current Local Plan remains in place. For plot 3 the fact that it is an SNCI would give further grounds for refusal.

If the Mayor and Cabinet do not agree with us on this and take the view that objections to planning approval on these grounds could be overcome; then we submit that at the very least this issue should have been covered in the report before you and included in the risk assessment.

As mentioned above, the report rejects the use of the allotments for access because of the possible delays that may be caused, we submit that given the designation of plots 1 & 3 then the planning process is likely to cause equal delay if an attempt is made to include them in the development plans.

Given this omission from the report and the risk assessment we suggest that the Mayor & Cabinet have no option other than to reject the report’s proposals at this time.

Conclusions

While we accept that the principle of development of part of Brislington Meadows for housing is included in the adopted Local Plan we object to the sale of the P&GSS land and its inclusion as part of the development site without further extensive consultation.

We object in principle to development on any land designated as Important Open Space.

We believe that the site can be developed without BCC disposal of the land and would welcome an opportunity to take part in consultation on provision of enhanced access through the adjacent P&GSS land for pedestrians, cyclists and wheelchair users to enhance the sustainability and environmental aspects of any development.

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