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For the Attention of: Sean Herbert South Gloucestershire Council  
By Email: [planningapps@southglos.gov.uk](mailto:planningapps@southglos.gov.uk)  
Comments for Planning Application P22/02113/O  
Case Officer: Sean Herbert

24th May 2022

Dear Sean Herbert

PLANNING APPLICATION: P22/02113/O Mixed use development on 141.94 hectares of land; LAND AT, THE FORMER FILTON RUNWAY, SOUTH GLOUCESTERSHIRE

*Application Summary Application Number: P22/02113/O Address: Land At The Former Filton Runway South Gloucestershire Proposal: Mixed use development on 141.94 hectares of land comprising: residential development for up to 6,500 dwellings; Student Accommodation (Sui Generis); Business Office and Research development (Use Class E); General Industry (Use Class B2); Hotels (Use Class C1); Extra Care Accommodation (Use Class C2); Education provision to include a Secondary School, Primary Schools, Children's Nurseries and further education buildings (Use Class E and F1); Community centres and uses inclusive of library, health (including GP and Dental facilities), and built sport facilities, (Use Class E, F1 and F2); Other E use class town centre uses up to inclusive of, public house and other drinking establishments, and hot food takeaway (Sui Generis) together with; supporting infrastructure and facilities including demolition, ground works and remediation, highways and parking inclusive of pedestrian and cycle routes, public transport inclusive of Metrobus route and rail station, utilities, landscaping, sustainable urban drainage, water basins and public open space. Outline application including access, with all other matters reserved.*

I write, together with my colleague Councillor Chris Windows, to place on record our objection to this massive revised planning application for the former Filton Airfield that spans into 2036. It has caused huge alarm for many local residents.

The first thing to note is the developers attempt to justify their new vision for Brabazon on the grounds that since the granting of the original scheme, other factors need to be taken into account. There are accommodating the planned YTL Arena; the case for maximising housing on brownfield developments; protection of the Green Belt; and a wish post pandemic to create a self-contained Urban locality.

Even taking these arguments at face value, the sheer scale of this revision is, in our view, excessive, unsustainable, and unacceptable to pre-existing communities (site neighbours) living on the Bristol border.

The applicants cite compliance with national planning guidelines and the urban lifestyles policies being developed by South Gloucestershire to railroad through a dramatic increase in density and height in the updated proposals. This envisages installing a number of 18-storey structures and two huge 30-storey buildings. These will have a widespread negative visual impact – affecting the skyscape of all those living in North Bristol. This includes harming the enjoyment of heritage assets like the Blaise Estate in our ward.

Outline planning permission allowed 'up to a maximum of 2,675 residential units'. This was already an ambitious target which posed a serious challenge to local transport infrastructure. It is now being proposed to raise this limit to 6,500 (143% uplift) to service potentially 12,000 additional residents.

YTL Developments concede that this sizeable increase exceeds the 'approximate capacity of Policy CS26... for the CPNN' (5,700 homes). However, they suggest that the harm caused by this non-



compliance is outweighed by the much-needed boost to the housing supply and other apparent economic or social benefits. Of course, such expansion is then used to defend or necessitate building extra retail, commercial capacity and other public amenities.

We have real concerns over the cumulative effects of these changes.

The National Planning Policy Framework (NPPF) simply sets out broad principles which are rightly left to local planning authorities to interpret, apply, and contextualise on a case-by-case basis. So, for example, it is not enough to state national and local strategic objectives to provide more housing by making 'as much use as possible of suitable brownfield and underutilised land.' The NPPF and permitted development does not provide a free hand to cram as many dwellings as possible into a designated space. It is a matter of degree, and we contend that in this instance this plan fails to meet even the most basic test of acceptability.

YTL further state their intention to create a retail regional destination which, once realised, will overwhelm any conceivable public transport schemes or improvements. Our belief is based on doubts that the objective of achieving a radical modal shift in personal transport is either likely or realistic.

Indeed, the developers seem to be setting great store over a supposed innovative phased approach in growth to match the delivery of promised transport infrastructure enhancements. Frankly, we are sceptical around realisation of all of this investment – certainly on the timescales envisaged here - having waited years for local rail improvements. For example, the Henbury Loop, despite fierce campaigning and lobbying, is still effectively an aspiration.

On transport projects, for far too long now, local authorities have a broken record of over-promising and underdelivering attractive alternatives to the private car. The four transport phases start off by linking the homes target to relatively modest travel measures such as increased Metrobus and rail services. But, in the end relies on a mass transit system that at present is hypothetical and speculative in nature. It is easy to see the developers uncoupling this link or requirement later down the line, thereby rendering this safeguard as something of a fiction.

To conclude, we strongly object to this comprehensive redrawing or reimagining of the Brabazon. It is a huge overdevelopment of the area being supported by some highly contentious claims (due to much higher densities) around environmental and ecological sustainability. It will cause undue harm to North Bristol and the already established communities.

Yours sincerely

Cllr Mark Weston and Cllr Chris Windows  
Henbury & Brentry Ward