



Summary of our objections to the revised planning application

Ref Application Number 22/01221/F relating to St Christopher's School Site, Westbury Park, BS6 7JE

January 2023

Who are we?

Formed in October 2021, SCAN is an action group campaigning to ensure that any development of the former St. Christopher's School site is both **sensitive and appropriate**. From small beginnings, we have grown into a thriving network of hundreds of residents, community stakeholders and businesses – working together to reflect the concerns of all those locally, as well as citywide, who are opposed to the current unacceptable proposals to overdevelop this site.

Over the past 18 months we have worked hard to help people understand the impact that the FORE Partnership proposals would have, not just on our local community, but also on important citywide policies relating to, for example, affordable housing and provision of services for children with special educational needs. We have consulted hundreds of households through door knocking, community stalls, virtual meetings, newspaper and magazine articles, email and social media updates, a vibrant website, and lots of conversations!

What does the community think about these proposals?

The continued strength of feeling about these completely unacceptable proposals is reflected in the fact that a truly enormous number of objections have been submitted to the council – to both the original application and to this revised application. Overall there have been 1254 objections from members of the public alone. Many more from councillors, MPs, statutory consultees, heritage and environmental groups – and council officers. 97.4% of the public who commented do not want this scheme. Only 1.3% were in support. 1.3% were neutral. Interestingly, there were more objections the second time round – even though the consultation period fell over Christmas and the New Year.

SCAN's formal objection to the revised scheme

The attached document is SCAN's formal objection to the revised planning application. It has been prepared, in close consultation with SCAN, by Michael Orr, BA (Hons), BPL, Dip UD, MRTPI, of Rapleys. Hundreds of people crowdfunded and donated what they could to finance both this objection, and our original objection, submitted in April 2022.

What are our key concerns about this scheme?

We are enormously disappointed by the lack of meaningful change within the revised plans. The modified application is a wholly inadequate response to the significant concerns raised in very large numbers not just by people in the local community, but by people across Bristol, and also by experts,

consultees and statutory bodies. Astonishingly, the FORE Partnership has not even bothered to consult the community about these amended plans. This unwillingness to fully engage in a meaningful way is completely unacceptable as well as deeply frustrating, given the time and effort people have spent over the last year communicating, time and time again, with the applicant about their views. It is also worth noting that the application itself is littered with errors and misleading information; many of which some of our members have pointed out but which have failed to be addressed. Much like the flawed and biased consultation process, this approach shows a blatant disregard for the community.

This planning application must be **robustly refused** by Bristol City Council for the following six reasons.

1) Harm to the heritage of Westbury Park

The proposed scale, mass and bulk of the proposals remain wholly unacceptable & inappropriate within this designated Conservation Area. The scheme would cause irreversible harm to the heritage assets and townscape of Westbury Park. There is a statutory duty for the local authority to protect our city's heritage.

2) Loss of SEND provision

The applicant has entirely failed to demonstrate that there is no longer a need to provide services for children with special educational needs on this site. The applicant has ignored Bristol City Council guidance and continues to disregard the increasing need for SEND accommodation in Bristol, and with no firm offer of replacement provision, is therefore failing to satisfy the requirements of BCS12 and DM5.

3) Damage to the environment and to biodiversity

The extent of tree loss proposed remains utterly unacceptable, particularly so given the many very, high quality mature trees on the site. These trees make a highly valued contribution to the character and appearance of the neighbourhood, and they also contribute to the biodiversity of the Downs Conservation Area.

4) Road Safety Risk

The proposal remains inappropriate in transport and highway terms, owing to insufficient on-site parking provision and inappropriate access/egress arrangements, which will increase the road safety risks in an area where there is already a significant concern. Please refer to our separate objection setting out our concerns purely on Highways grounds.

5) Lack of Affordable Housing

The proposal includes no affordable housing, which is contrary to the aims of the city council, the adopted development plan and national policy. We have reviewed the Financial Viability Assessment (submitted five months late by the developers, in July 2022). This purports to justify such lack of provision on the grounds that this would make the scheme 'technically unviable'. This is demonstrably not the case. The stated reasoning for not providing affordable housing is flawed and does not stand up to scrutiny.

6) False claims about alleged 'community benefit'

There has been no discussion with the community about their real priorities and needs and, therefore, there is no evidence to support the claims made by the developer that the so-called 'benefits' of a cafe and/or meeting rooms are either needed or wanted by the community. It is our contention that the proposed scheme does not deliver genuine benefit to the community. It is reasonable to ask, if the scheme is delivering 'community benefits'; why are more than 97% of the formal comments on the scheme opposing this application?

In conclusion

This revised planning application does not comply with multiple core Bristol City Council policies, nor our own Community Planning Principles drawn up jointly with the Westbury Park Community Association, and submitted to Bristol Council on 3/11/21. These wise principles for the development of the site are entirely in line with established Bristol City Council planning policies, and were included in the Pre Application guidance given to the developer by Paul Chick on behalf of the council on 8/11/21.

We urge the councillors to recognise the validity of our concerns, which are based on well established council policy and to indicate that this application should be **robustly refused**.

We would like to stress our belief that the application should be refused on **all** the grounds that we have laid out and the refusal should be extensive, detailed and specific. We hope this would help avoid future applications wasting both the council and community's time and resources due to only making minimal changes, as well as being vitally important to ensure that any further proposals for this site, by this developer or any other, appropriately reflect the constraints of the site and comply with all established Bristol City Council Policies.

With many thanks
The Team at SCAN