

Public Forum

D C Committee A

2pm 15 November 2023



1. Members of the Development Control Committee A

Councillors: Richard Eddy (Chair), Fabian Breckels as substitute for Philippa Hulme, John Geater, Fi Hance, Tom Hathway, Tim Rippington as substitute for Farah Hussain, Chris Jackson, Paula O'Rourke and Andrew Varney



Question	Speaking	Name
1	Yes	Bristol Tree Forum – Mark Ashdown

Statement Number	Speaking	Name
23/03826/F – The Memorial Stadium, Filton Ave		
1	No	Pabitra & Jane Ghosh
2	No	Alan & Wendy Bennett
3	No	David Hewett
4	No	Brad Warburton
5	No	Mark Smith
6	No	John Moger
7	No	Kevin Marsh
8	No	Rob Mitchell
9	No	Michael Batt
10	Yes	Bristol Tree Forum – Mark Ashdown
11	No	Adrian Smyth
12	No	Stephen Barrett
13	Yes	Hannah Donnelly
14	Yes	C Walker
15	Yes	Andrew Milton
16	Yes	Kevin Hunt – BNP Paribas
17	Not indicated	Jade Wellesley-Miller
18	Yes	Councillor Tom Renhard
19	Yes	Councillor Emma Edwards
20	No	Anonymous



Dear Democratic Services,

Please place the following questions before Development Control Committee A in time for its meeting next week:

Question 1.

Why have our comments on this application been ignored?

Q1 Response:

We apologise for not covering the comments in full in the first report released. We needed to consult further with the Ecologist and the BNG officer regarding the suggestion Conservation Covenant under Part 7 of the Environment Act 2021 (EA 21), we were unable to do this until yesterday.

However, we did cover public access to the offsite habitat site to some extent in section: K. FUTURE COMMUNITY ENGAGEMENT. Within this section we outlined in the statement of Community Involvement the club has also committed to holding a regular 6-monthly meeting with local residents to keep lines of communication open. Details of that event will be shared by means of email / hard copy invites and through liaison with the ward councillors. There have been suggestions through the consultation process that local residents should have access to the area of natural interest to South of the stand. This has been discussed with the club who need to give this further consideration. If this was achieved it would allow for greater community engagement with the club. However, it would be beyond the scope of the application to secure access though condition. However, it is suggested this could be a topic for discussion at the 6-monthly meeting.

Question 2.

The site where offsite habitat creation and enhancement are proposed is currently landlocked. We have proposed that it be made accessible to the local community and designated an Asset of Community Value. In this way the site's future could be secured and provided as part of the mitigation the local community is entitled to as a result of these proposals. This could benefit the applicant because the community could be involved in helping to provide long-term care and maintenance.

This could be done by requiring the applicant to enter into a Conservation Covenant as now required under Part 7 of the Environment Act 2021 (EA 21). Whilst the full effect of the EA 21 has not come into force, the requirement to provide a Conservation Covenant came into force on 30 September 2022.

Why has the officer not drawn our proposal to the attention of the committee?

Richard - because I am certain that neither you nor your committee have seen our comments, I attach a link to them here - https://bristoltreeforum.org/wp-content/uploads/2023/10/23_03826_F-BTF-Comments.pdf. Please can both you and your committee to read this before you meet.

Q2 Response:

It has been suggested to allow public access to the habitat area. It could have an impact on the condition assessment proposed by the applicant and downgrade it. The area is being used for natural habitat uplift and biodiversity benefits and, in this case, public access may conflict with

that. However, public access to contribute to the management/maintenance of the woodland, this could be supported, but again is the decision/responsibility of the applicant and landowner. It would be unreasonable to condition public access to the habitat. This could be a topic of discussion between the club and locals as explained above in paragraph K.

Suggestions have been made to secure public access through a Conservation Covenant as now required under Part 7 of the Environment Act 2021 (EA 21).

A Conservation covenant is not currently feasible because to do that the Secretary of State needs to designate “responsible bodies” (LPAs, NGOs, and others) to enter into them with the developer. Bristol City Council have neither been designated as one, nor applied to be one.

I can confirm that the discussion of public access to the natural habitat was discussed with members at the Committee Agenda briefing. The agent was informed and asked to pursue this further, their response was that they feel it may impact negatively on biodiversity.

I plan to submit a statement and attend the meeting.

Mark

Mark CD Ashdown
Chair, Bristol Tree Forum
bristoltreeforum.org

Proposed replacement of South and south west stands to increase capacity.

I urge the Committee to reject this application

The football club claim to be a part of the community . However they have not consulted at all on this plan to expand capacity. In fact it looks very much as if they hoped local residents would not notice, as they started building before permission was granted.

Local people have had to endure years of inconsiderate parking, noise and disruption on match days yet this application makes no mention of mitigation measures like those agreed in the S106 agreements in an now long past application to expand.

The Memorial Ground was always an unsuitable venue for professional football. It is surrounded by residential housing, densely packed and many without garages . Increasing numbers of HMOs mean even more cars are parking on streets and any expansion of numbers attending matches will exacerbate the problem and potentially cause disturbances and friction.

The removal of parking caused by the bus lane on Muller Road will add to these problems.

On a personal note, we and many others have been forced to pave over our front gardens at great expense to create a parking space which we can use on Saturdays. This is unacceptable and bad for the environment.

Unless and until some plans are put forward to mitigate the impact on residents of noise, light, overshadowing, traffic and disruption to our civil rights to come and go freely from our houses on match days (by imposing a residents only matchday parking scheme) this application should not go ahead.

Rovers have come up with many schemes to move to a more suitable venue , all of which have failed through financial problems or general mismanagement. Their fans have been badly let down and we, the residents of Bristol 7 are having to pay the price of the clubs failures . Please refuse this application

Pabitra and Jane Ghosh

I wish to give my full support to the Bristol Rovers FC proposal to replace the old temporary stands with a more permanent structure which has been required for years.

I feel one of the main benefits with the extra seats will be that it will give families more opportunity to bring their children to matches. In addition the new improvements will give greater access to those who are disabled and cannot at present attend matches which is a major and important move forward.

From a neighbours point of view there is no loss of privacy as the stand has no windows opening in the Alton Road direction and in addition as the new stand will face north this will not cause a shadow on the local houses.

When you travel to other football grounds the facilities for away supporters are often excellent and Rovers plans will improve the current poor facilities for those travelling from around the country which is important and gives visitors a good impression of Bristol.

One aim of the development is simply to go back to the previous stadium capacity so there will not be major affect on the local community.

I urge the Council to approve the Bristol Rovers Planning application

Thank you

Alan Bennett

So far you would have no doubt had objections from the vocal minority of current local homeowners objecting the stadium plans.

No doubt, in ten of fifteen years many of the objectors will no longer live in the area.

On the other side, thousands of Bristol Rovers supporters and local business want the plans to go through.

I doubt, however, if you have heard from many visitors to Bristol.

As they say, first impressions count. How many young football fans would want to return to Bristol on holiday in later life, if their first experience is to stand on a cold wet open terrace?

Away supporters must think time has stood still as the facilities are similar to those in the 1980s. As a proud Bristolian, it does not feel good that our guests have to use an outside portacabin for toilets.

You would not expect those facilities if you went to a cinema, restaurant or shops, so why should football fans get treated so badly?

If it is a wet afternoon, many of our guests have to return, sometimes hundreds of miles, soaking wet. It hardly gives the impression that Bristol is a welcoming place to visit.

I am sure many ardent away fans must look at the fixture list to see a visit to Bristol in the winter months and think they probably won't bother.

With better facilities there will undeniably be more away supporters who will spend their hard earned money in Bristol, which will help create jobs, both at the football stadium, the local area and wider Bristol.

David Hewett

To whom it may concern,

I wanted to take this opportunity to put forward my support for the south stand proposal. The stadium is in serious need of renovation and modernisation in addition to being more family and disability friendly in terms of providing adequate seating.

Kind Regards, Brad.

I write to SUPPORT the application for the following reasons.

The application is effectively to replace an existing temporary structure with another. Although the proposed structure is larger than existing the application documents make it clear that this does not significantly negatively affect any neighbouring property for light or noise issues.

Indeed there will be improvement to some degree reduced noise and improved aesthetics due to the new development.

The proposal will provide much needed improvements to facilities at the South end of the stadium along with improved and increased disabled facilities.

The proposal provides for much needed increase in seated capacity at the stadium, but only serves to bring the overall capacity back to previous levels. Therefore inherently this leads to improvement in safety and comfort for the whole stadium.

Although larger than existing stand, the proposed new stand is still within the previously approved elevations for a full stadium redevelopment.

The ability to have a larger capacity safely and in comfort, will not detrimentally affect traffic issues as the capacity number is still relatively similar to previous years and well below the previous permission.

More traffic and parking issues are created in the area by the increase in houses of multiple occupation serving the student community - which is noticeable outside of term times.

The stadium has existed on the site for more than 100 years and it is unrealistic to not accept developments that are largely insignificant to local neighbours in houses that post date the stadium.

The proposal will allow the level of capacity to return safely to previous levels which will provide for additional economic activity and jobs for local businesses - including at the stadium itself.

To conclude there appear limited planning reasons to reject and many reasons to APPROVE the application at the earliest opportunity and certainly within statutory deadlines.

Therefore, I would request the above factors are fully considered in deliberations over this application.

Thank you

Regards,
Mark Smith

With regard to the above I wish to register my **full support** for the application.

I trust the council members considering this application will acknowledge the need for the development to proceed on its merits, and not be influenced by objections on spurious grounds, or prejudicial 'non-planning' comments from a very vocal minority trying to dominate proceedings.

John Moger

Good evening

I am emailing you in the hope, and expectation, that you will support the proposal to build this stand.

I have no idea if you have ever visited the stadium, but if you haven't, please believe me, that this new stand is so badly needed by the citizens of Bristol, and travelling supporters.

At the moment, the stadium is, without doubt, one of the worst of the 92 clubs in the English football pyramid.

Many a time, I have witnessed far superior facilities enjoyed by clubs much smaller than Bristol Rovers, with food and drink establishments, well appointed seating, a sheltered concourse.

This is so deflating to see, when compared to what is provided in Horfield.

Having visited many different stadiums around the country, I can assure you that the stadium is primitive, and totally lacking in modern day facilities that provide an attractive environment for football supporters to enjoy, especially during the winter season.

The stadium is something of a joke amongst followers of other teams, and I have seen it described as like Chernobyl, which is particularly embarrassing for Bristol Rovers supporters.

The new stand will allow the club revert to a 12,000 capacity, was the case just a few years ago, and will be a facility that will enable the club to obtain much needed extra revenue.

Bristol Rovers are an established feature of the Horfield area, and football fans bring much needed custom to many businesses.

Your decision will be one of the most significant in the club's 140 year old history, and implore you to provide the impetus for the club to begin moving into the 21st century, at long last.

After 27 years of scant improvement in the club's facilities for spectators, a positive decision will enable the club to possess a feature that will bring about a sense of pride, and not embarrassment.

Your Sincerely

Kevin Marsh

Email forwarded to Democratic Services 7/11

To the members of the planning A committee.

Planning application 23/03826/F

Replacement of the current South and South West Stands with a new improved facility to increase the number of seats within the Memorial Stadium, and new toilet facilities and concession stalls.

I hope that the committee will support the recommendation of the planning officer in approving this planning application.

Whilst bigger than the previous temporary structure it does not increase the capacity significantly, it simply increases the number of seats available providing more comfort and additional facilities, particularly for away supporters.

Councillor Emma Edwards (Bishopston ward) said she would be supportive of the application once all relevant documents were submitted, which I believe is now the case.

The Memorial stadium was deemed an asset of community value by the Bishopston society and Friends of the Memorial Stadium but it cannot remain the same forever, the club must be allowed to improve and modernise to keep it worthy of a community asset.

Thank you for your time.

R Mitchell

Dear Councillors,

Memorial Stadium, Horfield. ref: 23/03826/F. Letter of support.

Much has been written in the last 15 years or so as to what should happen to the Memorial Stadium. Several groups have been set up to oppose any new developments, then, when it was thought a supermarket would be built on it, other groups were set up to insist it is kept as a stadium. It was also granted the status of Asset of Community Value to protect it in case it was offered for sale.

It is Bristol's largest memorial to the men and women who gave their lives so that we all could live on and prosper. It is only right that as custodians of the stadium, Bristol Rovers are allowed to modernise the ground in a modest and sympathetic way to keep the memories of the fallen alive.

As a professional sporting venue it has been on this site longer than any resident living around its boundaries and was always likely to be enhanced to some degree. Let's be honest, the football club are not trying to impose something of Wembley Stadium proportions on the site. I have read the planning officers report and agree with his recommendation.

For the reasons I've given above, I trust you will do the right thing. The proposal should not be subject to any party political bias and should therefore be granted planning permission, unopposed.

Thank you for taking time to read this.

Yours faithfully,

Michael Batt



23/03826/F | The Memorial Stadium Filton Avenue Bristol BS7 0AG

Without seeking your prior approval, this applicant has ignored the protests of the local community and proceeded with its planned development regardless. What is perhaps worse is that the planning authority has done nothing to prevent it (quite the opposite, it seems) and the local community has been left to suffer in silence.

You now have an opportunity to provide some small level of mitigation for this.

There is a patch of land to the south-east of the grounds which the club owns and which it proposes to use to mitigate some of the environmental damage it's caused. We suggest that the club commit to making this land a shared space available to the community.

You have the power to do this by requiring the club to enter into a formal Conservation Covenant, as set out in Part 7 of the Environment Act 2021. This should be a prerequisite of your approval.

Notes:

1. **Part 7 Conservation Covenants** of the Environment Act 2021 (EA 21) can be found here:

<https://www.legislation.gov.uk/ukpga/2021/30/part/7/enacted>. Section 117(1)(a) states:

For the purposes of this Part, a “conservation covenant agreement” is an agreement between a landowner and a responsible body where—

a) the agreement contains provision which—

(i) is of a qualifying kind,

(ii) has a conservation purpose, and

(iii) is intended by the parties to be for the public good,

The agreement provision is of a *qualifying kind* because, as part of the planning consent, the applicant (the *landowner*) will be required to enter into a 30-year Landscape and Ecological Management Plan, known as a LEMP.

In this case, the s.117 *conservation purpose* is ‘to conserve the natural environment of land or the natural resources of land’ - s.117(3)(a).

The *responsible body* is this Local Planning Authority.

2. S118(3) makes specific reference to agreements which include provision for public access to land.

3. Part 7 of the EA 21 came into force on 30 September 2022 under the Environment Act 2021 (Commencement No. 2 and Saving Provision) Regulations 2022 -

<https://www.legislation.gov.uk/uksi/2022/48/made> - under Regulation 5.

23/03826/F | Replacement of the current South and South West Stands with a new improved facility to increase the number of seats within the Memorial Stadium, and new toilet facilities and concession stalls. | The Memorial Stadium Filton Avenue Bristol BS7 0AG

We are pleased that the applicant has finally produced a properly formulated application, including evidence about the trees and other habitat on the site. While we have some technical points to make, set out below, we believe that this proposal presents an opportunity to mitigate the lost trees and habitat and bring a long-term benefit to the local community.

DM17 and BTRS

We also note that the applicant has failed to take account of its obligations under SADMP DM17/BTRS and has not calculated the number of replacement trees required. We calculate that six replacements will be needed:

<i>Totals</i>		<i>4</i>	<i>4</i>		<i>6</i>
<i>Tree ID</i>	<i>Tree Category</i>	<i>Onsite Tree Count</i>	<i>Trees Removed</i>	<i>DBH (cm)</i>	<i>Trees x Trees Removed</i>
<i>T1</i>	<i>B</i>	<i>0</i>	<i>0</i>	<i>48</i>	<i>0</i>
<i>T2</i>	<i>B</i>	<i>1</i>	<i>1</i>	<i>17</i>	<i>1</i>
<i>T3</i>	<i>C</i>	<i>0</i>	<i>0</i>	<i>19</i>	<i>0</i>
<i>T4</i>	<i>C</i>	<i>0</i>	<i>0</i>	<i>17</i>	<i>0</i>
<i>T5</i>	<i>C</i>	<i>0</i>	<i>0</i>	<i>16</i>	<i>0</i>
<i>T6</i>	<i>B</i>	<i>0</i>	<i>0</i>	<i>24</i>	<i>0</i>
<i>T7</i>	<i>C</i>	<i>1</i>	<i>1</i>	<i>10</i>	<i>0</i>
<i>T8</i>	<i>C</i>	<i>0</i>	<i>1</i>	<i>20</i>	<i>0</i>
<i>G1</i>	<i>B</i>	<i>0</i>	<i>0</i>	<i>17</i>	<i>0</i>
<i>G2</i>	<i>C</i>	<i>1</i>	<i>1</i>	<i>22</i>	<i>2</i>
<i>G3</i>	<i>C</i>	<i>1</i>	<i>1</i>	<i>17</i>	<i>1</i>
<i>G4</i>	<i>C</i>	<i>1</i>	<i>1</i>	<i>24</i>	<i>2</i>
<i>G5</i>	<i>B</i>	<i>0</i>	<i>0</i>	<i>17</i>	<i>0</i>
<i>G6</i>	<i>B</i>	<i>0</i>	<i>1</i>	<i>25</i>	<i>0</i>

Table 1 DM17 Replacement Trees calculation.

We have included tree groups G2, G3 & G4 even though they are unspecified, because they appear to be within the redline area and some of the trees in them have been removed. Our BS5837:2012 DBH (stem diameter) calculations take account of the fact that most of the trees surveyed are multi-stemmed.

The Biodiversity Net Gain calculation

We do not take issue with the Biodiversity Metric calculation done using BNG 4.0, save for the



Comments - 25 October 2023

following:

1. We do not agree that the onsite trees should be classified as *Woodland and forest - Other woodland; broadleaved* habitat. These trees are clearly *Individual trees - Urban* habitat under paragraph 8.3.5 of the BNG 4.0 User Guide: '*Individual trees may also be found in groups or stands (with overlapping canopies) within and around the perimeter of urban land. This includes those along urban streets, highways, railways and canals, and also former field boundary trees incorporated into developments. For example, if groups of trees within the urban environment do not match the descriptions for woodland, they may be assessed as a block of individual urban trees.*'
2. We calculate that this habitat covers an area of 0.0147 hectares (ha) and that none has been retained. We accept that it is in Poor condition but has Medium Strategic Significance - Location ecologically desirable but not in local strategy. On this basis, it is worth 0.06 Habitat Units (HUs) and the whole onsite baseline habitat is worth 0.28 HUs. We have adjusted the online baseline area to 0.307 ha by adjusting one of the zero-rated habitats so that this has no impact on the overall calculation.
3. We accept the *Woodland and forest - Other woodland; broadleaved* habitat classification of the offsite trees that fall within the Blueline area to the south-east of the site, even though they too fall within the *Individual trees - Urban* habitat classification. This is because they form a cohesive group, and no information has been provided to allow their habitat area as *Individual trees - Urban* habitat to be calculated; and there is evidence to suggest that this habitat is not woodland.¹
4. We calculate that this offsite habitat area is 0.104 ha, of which 0.02 will be retained and 0.084 ha will be enhanced. We accept the applicant's other baseline parameters. On this basis, the habitat is worth 0.46 HUs.
5. We also accept the applicant's offsite enhancement proposals, which will achieve 0.63 HUs.
6. We recommend that the six replacement trees required under DM17/BTRS also be planted in this habitat so that, at the end of the 27 year time-to-target period they will have achieved Medium condition and contribute 0.08 HUs to BNG.

On this basis, we calculate that these changes will achieve a BNG of 51.06% and contribute net 0.14 HUs to the development rather than the 10.53% BNG and the net 0.03 HUs proposed.

Our BNG 4.0 calculation has been submitted with these comments.

Conclusion

Before we endorse this plan, however, we will want to see the applicant's Landscape Ecological Management Plan (LEMP) and the Conservation Covenant required under Part 7 of the

¹ By viewing a sequence of Google Earth Images between June 2017 and May 2023.



Comments - 25 October 2023

Environment Act 2021 (EA 21).² Whilst the full effect of the EA 21 has not come into force, the requirement to provide a Conservation Covenant came into force on 30 September 2022.³

The site where offsite habitat creation and enhancement are proposed is currently landlocked. We suggest that it be made accessible to the local community and designated an Asset of Community Value.⁴ In this way the site's future could be secured and provided as part of the mitigation the local community is entitled to as a result of these proposals. This could benefit the applicant because the community could be involved in helping to provide long-term care and maintenance.

We hope that the applicant will take up our suggestion.

² <https://www.legislation.gov.uk/ukpga/2021/30/part/7/enacted>

³ <https://www.legislation.gov.uk/uksi/2022/48/made>

⁴ <https://www.legislation.gov.uk/ukdsi/2012/9780111525791/contents>

I would just like to take this opportunity to ask the committee to endorse the planning application for the new south stand. We really need to update the stadium and bring it into the 21st century. Having better facilities for the disabled and just keeping people dry and comfortable should be a given in this day and age.

Adrian Smyth

Statement - 23/03826/F Replacement of the current South and South West Stands with a new improved facility...

I objected to the planning application a few weeks ago as the demolition and (almost complete) build of the new stand has taken place without full pre-application consultation with the Planning Authority and residents, and planning permission. Whilst such action by the Football Club is not illegal in terms of planning law, the club has had enough experience since the start of the Millennium of consultation practices and procedures to know the correct way of moving forward when considering changes to the Stadium.

However, despite the lack of pre-application consultation the Planning Authority appears to have carried out due diligence with the planning application and a number of concerns raised by myself have been addressed and (in my opinion) have been answered through the conditions recommended in the Officers report, though I still have a number of issues I believe should still be addressed, and they are as follows:

- 1) Public Address system - Full details of amendments to the public address system, including positioning, should be approved by the Local Planning Authority. Also, to ensure the PA system is only used during events taking place within the stadium, say two hours prior to the event commencing (apart from testing purposes) until 30 minutes after completion of the event, to ensure minimum disturbance to adjoining residences.
- 2) It is clear additions and amendments to the stadium lighting system will be required, not only for attendees of events but also to the flood lighting for the playing pitch. Plans for lighting should therefore be submitted to the planning authority to ensure the safe use of the stadium, and to ensure no impact on near residents' amenity.
- 3) A concern of residents on Filton Avenue and other nearby streets is the amount of litter left on the streets prior to and after football matches. A plan showing the location of new and existing litter receptacles: at the entrance points to the ground, around the new stands, and at locations close to 'pasty huts', should be provided and agreed with the planning authority. There should also be signage at the entrances about keeping the stadium and surrounding area litter free.
- 4) There should be an event restriction (other than a sporting event) for the use of the playing pitch unless approved by the planning authority. This should include restrictions on music events, etc. and in any case no event of any description should take place before 8.00am or after 11.00pm on any day of the week to protect the amenity of nearby homes.
- 5) I understand the road entrance to the stadium at the Memorial Gates and the central access road (to the car park, Not Trubshaw Close) are not adopted and require some maintenance. These roads should be brought up to standard and adopted to ensure pedestrian safety, and be used exclusively for pedestrians on match days and, to protect the Memorial Gates, ensure no traffic through the gates at any time.

Thank you.

Stephen Barrett

Dear Council

I would like to submit an official statement about the planning application for Memorial Stadium South Stand, due to be discussed Wednesday 15th November. I would also like to speak at the meeting. I realise the time given is only 1 minute, I will abridge depending on what has already been said during the meeting.

Written statement:

I am a resident of Alton Road, which borders the Memorial Stadium, in particular the South Stand.

I object to the planning application of the stand and have been so adversely affected by this process I have sought legal advice and considering an injunction.

The Club has not consulted properly with the local community as recognised in the report and in the fact that work begun without notice, let alone any consultation with us.

The recent announcement by Mr Al Saeed, Club Owner, that this is only phase 1 from 3 phases for expansion has shown that the club does not consider its impact on local residents or infrastructure at all. In fact when asked directly about local residents there was no statement of understanding or willingness to work together, only to 'not surprise' residents in the future. The South Stand application has raised significant concerns about local infrastructure, if granted retrospectively, what precedent does this give the club to continue with plans that have not been properly scrutinised, managed or planned? What measures are being put in place to protect local residents from issues of parking, traffic, noise and litter?

I hope the committee considered whether that the fact this project was rushed through in an attempt to be ready for the 2023/2024 season has impacted the proper due diligence necessary for the purposes of planning. The initial site safety was dubious highlighting poor regulations from the start.

The club has many football supporters and I hope the council have given higher consideration to comments made from local residents impacted by this development every day rather than those that do not live nearby. I would like it acknowledged that the initial number of objections were much higher, but the council removed and erased them from the system for a re-submission of the application.

Personally I have concerns about the accuracy of the light and noise impact reports. The plans do not seem correct and neither 'expert' visited my home. While a technical daylight and sunlight assessment has been reported as 'minor change' in daylight, it is a reported reduction of 29%, that is not minor to me, and there is no mention of the huge amount of overshadowing the stand does to the street. The changes are detrimental to my living conditions. The way people balance work and life has now changed, particularly since the pandemic. The report on light brushes under the carpet that individuals use their properties in different ways. Is it right to disregard the effect of light on upper rooms because they

would nominally be used for sleeping in the 20th century? I assume the committee can give assurances that they have properly investigated the accuracy of the impact assessments against what has actually been built.

I feel totally unsupported and let down by this process, no member of the public would be allowed to have built such a structure that adversely affects so many residents with no planning permission and no repercussions.

Yours sincerely

Hannah Donnelly
Alton Road resident

“A” - ABOUT TIME

The Memorial Ground has been a sporting venue for 103 years. Sadly, in 2023, it is now dilapidated, run-down, and massively under-developed.

This historical stadium should be permitted to cater properly for family groups, disabled fans and visiting supporters. An all-seated South Stand will be a big step forward.

THE TIME IS NOW**“B” - BRISTOL IS A SPORTING BACKWATER**

Despite recent developments, the County Ground is placed 11th out of 18 grounds in terms of permanent seating in County cricket. Meanwhile, the Ashton Gate stadium is ranked number 33 among football league stadiums in terms of overall capacity in England.

In terms of seating and spectator facilities the Memorial Stadium is among the very worst in the EFL. Even with the proposed new South stand The Memorial Stadium will still be in the bottom 10 per cent of the 92 league grounds in terms of seating capacity.

IS BRISTOL A CENTRE OF SPORTING EXCELLENCE OR IS IT A SPORTING BACKWATER?

“C” - CASH MATTERS

Bristol aspires to become a great European city. To achieve that status, the city needs to have high quality Cultural, Arts, Sports, and Heritage provision.

Bristol is doing well in terms of Culture, Arts and Heritage but has no sports facilities that are leading edge, top of the range or the very best nationally. This needs to change.

SPORT MATTERS

Dear sir or madam,

I wish to **register to speak** at the planning committee meeting that is considering the above application at 2pm on Wednesday 15th Nov. Please find below my accompanying written statement.

This application increases the capacity of the Memorial Stadium while providing no additional parking spaces or other transport arrangements for match day visitors. Parking in the local area is already a considerable imposition on residents even on non-match days, and this will only exacerbate the current situation, which is the number 1 concern of Bishopston and Ashley Down residents.

Rovers' lack of awareness of the impact is shown by statements on the website. Although it encourages visitors coming by car to park with care, it says, "there is plenty of on-street parking available" and recommends Muller Road and the roads between Kellaway Avenue and the Gloucester Road. The proposals, as they stand, will only add pressure to the availability of parking in the ward. It currently has to cope with the existing stadium's capacity but also has to cater for matches and events at the County Ground, and the increasing needs of HMOs and Apart-hotels. Muller Road has already had to have a new bus lane in order to make it viable for public transport and more parked cars will not help.

Please refuse this application until it contains a suitable addition for parking on-site.

Yours sincerely,

Andrew Milton

WRITTEN STATEMENT ON BEHALF OF BRISTOL ROVERS FOOTBALL CLUB**Application No: 23/03826/F****Site Address: The Memorial Stadium, Filton Avenue, Bristol, BS7 0AG****Development Control Committee A: Wednesday, 15th November 2023**

Good afternoon and thank you for the opportunity to speak to you today.

This application seeks planning permission for a new South Stand at the Memorial Stadium, which has been operating as a major Bristol sports venue for over 100 years.

The new stand will improve the look and feel of the stadium and provide enhanced facilities for supporters, with better provision for disabled spectators in particular.

The Club has acknowledged its mistakes with the original application and recognises that it should have consulted with the local community sooner; it has since taken proactive steps to resolve those issues and has put in place measures to ensure future engagement.

We have worked to address all matters identified by the community and consultees. For example, the proposals now include for the installation of solar panels, contributions to tree planting and the dedicated management of the green space in the South West corner of the stadium for ecology and biodiversity net gain.

The Club has also agreed to make financial contributions, in line with those requested by Transport Officers, to improve local road safety and to enhance accessible transport connections. In addition, the Club has committed to preparing and implementing a Travel Plan which will have long-term positive impacts for sustainable travel.

The Noise Assessment and the Daylight/Sunlight Study both demonstrate that there will be no material adverse impact on nearby residents.

All of this means that, as clearly set out in the Officers report, there are no technical or policy-based objections to this application.

This planning application is vitally important for the future of Bristol Rovers Football Club, and we would therefore respectfully ask that you approve this application today.

Thank you.

I am taking the time to write this statement as a local resident to the Memorial Ground. My property has been impacted by the stand development at Bristol Rovers' football ground. A stand which they have very nearly completed, despite not having their planning application approved.

I am angry that the Bristol planning process has not protected my interests, as someone who lives and works in this city and has been invested in its built environment on both a professional and personal level.

I am not against the stadium increasing their capacity, and developing themselves as a business and community asset, but when the needs of football fans who come to the local area once a week for half of the year, mean more than the local residents who live, work, and own property in the area, something is wrong.

The (second) planning application which has been submitted has been done so with the minimal amount of effort. The reports are poor and lack substance, rational and in many instances common sense. For example:

- The BNG calculation is based on a survey carried out in September 2023. The trees and habitats which were destroyed by the ground developments in June do not appear in the survey. It is easy to produce a 10% increase when you have already ripped out the trees and plants.
- The daylight and sunlight assessment are inadequate. With regards to further calculations, VSC can be a limited metric and the calculation of daylight illuminance levels within the affected properties should be carried out to provide a more complete picture of the daylight availability.
 - The report states “it has not been possible to obtain room layouts for all of the properties and therefore layouts have been assumed where information is not available”. At no point was room layout or usage data requested from any of the local residents for the purpose of the study. This is unacceptable.
 - The non-compliant window at No 20 Alton Road is assumed to be a bedroom window and has a reduction of 23%, which takes the VSC from 32.41 to 24.91. A VSC of 27 is said to provide reasonable daylight results, therefore this reduction takes the room below that threshold by more than the 20% reduction considered to be acceptable by the guidance. This is unacceptable.
 - Although the guidance advises that bedrooms can be considered less important, if the layouts have been assumed (as stated in the report), the room may be used as a living space or home office for example. Here where access to daylight is more important, describing the effect of the proposed building as minor and of lower importance on this basis is misleading if this room is not solely used as a bedroom for sleeping. This is unacceptable.
 - Similarly at 23 Alton Road, W6 has an existing VSC of 29.63, dropping considerably to 22.64 in the main living space (a reduction of 24%), where daylight is considered to be important. A VSC of 27 is said to provide reasonable daylight results, therefore this reduction takes the window below that threshold and by more than the 20% reduction considered to be acceptable by the guidance. This is unacceptable.
 - The report also states the room has two further windows which are “unaffected” by the Proposed Development, however this is misleading as these “further”

windows form part of a bay window with W6 and have further VSC reductions of 14% and 3% respectively, in addition to the 24% reduction to W6 to the main living space of the property. This is unacceptable.

- Daylight illuminance calculations could be carried out to provide a more complete understanding of the reduction in daylight to the living space, to further inform the limited VSC results.
- As above, 25 Alton Road W5 and W6 have existing VSCs of 33.22/32.52, dropping considerably to 26.1/22.98 in the main living space (a reduction of 21%/29%), where daylight is considered to be important. A VSC of 27 is said to provide reasonable daylight results, therefore this reduction takes the windows below that threshold by more than the 20% reduction considered to be acceptable by the guidance.
- The report also states the room has a further window which is “unaffected” by the Proposed Development. This is misleading, as the window forms part of a bay window with W5/W6 and has a further VSC reduction of 7% in addition to the 21% & 29% reductions to W5/W6 in the main living space of the property. Daylight illuminance calculations could be carried out to provide a more complete understanding of the reduction in light level within the living space, to further inform the limited VSC results.
- The model does not appear to have accounted for any shrubs, fences etc., which in some instances appear to be quite significant. Although these features would be present in both existing and proposed scenarios, they may affect the overall VSC reported and conclusion as to whether reasonable daylight is achieved. Also, the report does not take into account the higher ground which the stand occupies.
- As residents it is the role of our council and elected members to protect, through the planning process, the infringement of our rights by large construction projects such as this. Residents have lost their right to light in their own homes. This isn't temporary or just on match days - this is a constant, round the clock, loss.
- Residents have sought legal advice at considerable cost and are now faced with the decision to pursue Bristol Rovers (and Bristol City Council) for which they have been advised they have a case. This is again at further cost to themselves, and is something that they should have been protected against by the actions of the Council, and a robust planning process and enforcement
- Similarly, to the lighting, the acoustics report is wholly inadequate. The acoustic report was a comparison study of the temporary seating (within the newly constructed stand), covered in canvas, and the newly constructed stand with the metal cladding which has now been installed. The report then claims that this is a betterment. The report does not compare the pre-construction state with the current state in an open and honest manner. The addition of nearly 3000 spectators, in seating significantly higher than what was there previously, is not a betterment to the previous stand. It is false to claim as such.
- The transport statement provided is wholly inadequate too. Again, the report bears the hallmarks of a low level of effort within its production. Incorrect or irrelevant bus timetables have been referenced and poorly evidenced assumptions made. The argument the stand is for more disabled access, yet disability access on public transport is not considered – yet they have looked at a train station, and the walk to the stadium. They have not spoken to any transport providers. For instance, there is no

examination of the lack of park and ride facilities and no real understanding, within the text, of the impact or the reasons for needing the transport statement in the first place. Bristol Rovers Football Club direct fans on their website to drive and park on local residential streets. This is not so much of an issue when they park legally, but the lived experience of residents bears out a story of blocked pathways, cars abandoned, cars parked on double yellow lines, and cars blocking traffic, particularly on the narrow residential streets or on Gloucester Road during rush hour.

I hope that this statement, borne from a thorough examination of the reports supporting the development of Bristol Rovers' football ground, shows how due diligence has not been conducted and that in approving the application, Bristol Council will have not fulfilled their mandate to protect residents. The best outcome for us at this stage would be the postponement of any approvals, until more adequate information is provided, with suitable mitigation for local residents. If you are not an expert in the knowledge needed to fully digest the information in the reports, I urge that you seek additional advice from professionals who work in the built environment.

This statement should not be read as opposition to the development itself, but as a signpost to the ways in which the development has undermined trust in the way that it has been conducted, exposing contempt for residents and the inadequacy of the organs of local government, which should not have let it get to this stage.

Kind regards,

Jade Wellesley-Miller
BA (Hons) MSc MAMP MCIQB

Dear all,

Please see the below statement to DCA from Councillor Renhard:

As a neighbouring ward councillor in Horfield, I write in support this application.

It's clear that the way the club has gone about building the new stand has caused some upset to local residents, including in Horfield Ward. I know that the club have taken steps since to improve consultation and engagement, which I welcome. However, the way the club have gone about the application needs to be differentiated from the application itself.

The Memorial Stadium is home to one of only two professional football clubs in Bristol. The club is an iconic institution in our city, its history goes back more than a century and as a city we should support it – not for the club itself but for the thousands of Gasheads who attend every week, tune into their matches on the radio, or even just keep tabs on the score. There's thousands of fans who will miss out on watching their team play if this application is turned down.

But more importantly, for the members of the planning committee at least – The Memorial Ground is not only a cultural asset but an economic one too. Gloucester Road has a thriving hospitality scene, home to some of the best pubs, bars and restaurants Bristol has to offer. But despite their long-term success, they're still struggling from the aftermath of Covid and the subsequent cost-of-living crisis; extra fans coming to the Memorial Stadium in matchday would provide a much-needed boost for them.

The benefits of this application clearly outweigh the downsides, but this is not to say that residents' concerns do not need to be addressed. From what I have heard, the primary concern seems to be parking. I ask that the committee looks to introduce a commitment for a parking scheme around the Memorial Ground, to manage the number of cars allowed to park on streets surrounding the ground, prioritising local residents. I ask that any travel plan is also given further consideration, so that public transport options on matchdays can be further improved.

To conclude: I hope you support the officers' recommendation to approve this application and look to introduce measures to alleviate parking concerns and encourage an improved public transport offer on matchdays.

I can understand the merits of this new larger stand and can absolutely see the benefits it will bring to the club and the fans, especially in the increased capacity for disabled supporters, accessibility and safety. And as a stand-alone application I appreciate the value of it, and why it will benefit the club and supporters. However, as a ward councillor my primary priority is representing residents, and throughout this process the residents living closest to the ground have been treated appallingly. I have worked with the club to advise on better communication, engagement and compromise but have so far seen little evidence of improvement, although I hope in time this will change given what they have promised.

The residents closest to the stand have had to put up with bad building practices, work at unsociable hours, and the stand being built with no prior consultation or discussion. Imagine what it is like for the residents who live directly next to this stand who have seen the stand being built with no planning permission, their light slowly disappearing and no indication of the impact on their home as it takes shape. There are ongoing concerns about the submitted light survey and the impact on light to properties in Alton road. There are also still concerns about the traffic and transport plan, the removal of trees and the effect on biodiversity and noise impact. While these have been covered in the application, as it stands, the residents have no reason to trust the assessments as there has been a failure to build trust. Promises made to residents back in September at the community meeting we organised, such as removing rubbish piles from the back of people's properties have still not been done.

I think these specific aspects do need a closer examination and it would benefit the committee to do a site visit to Alton Road. I hope whatever the outcome, the club work harder to engage with local residents, include them more in their future plans and listen more to their concerns.

My main objection is the detrimental impact that the development has had on the residential amenities. In particular the overshadowing and reduction in light levels. By their own admission, the light across multiple windows of my property has been decreased, with one window below the BRE guidelines as published, which has been discounted because they have made a number of assumptions about how these rooms are used, without asking and used this lack of information to write a report in their favour. Needless to say, the use of the rooms is not as they have assumed (and used those assumptions to their favour).

The report states "it has not been possible to obtain room layouts for all of the properties and therefore layouts have been assumed where information is not available". The non-compliant window at No 20 Alton Road is assumed as a bedroom and has a reduction of 23% which takes the VSC from 32.41 to 24.91. A VSC of 27 is said to provide reasonable daylight results, therefore this reduction takes the room below that threshold and by more than the 20% reduction considered to be acceptable by the guidance. Although the guidance advises bedrooms can be considered less important, if the layouts have been assumed, the room may be being used as a living space or home office for example, where access to daylight is more important, so to describe the effect of the proposed building as minor and of lower importance on this basis could be misleading if this room is not only used as a bedroom for sleeping. Which it is not. There are a number of properties that have also been affected by a reduction in light.

We have also had to engage lawyers and subject area experts to extract the data from them regarding this, when they said they would freely give it to us (but did not follow up with disclosing without a letter from our solicitor).

There are also concerns around the additional traffic in the area due to the increased capacity. In the report from the planning officer this has been discounted as the new stand takes them to 'pre-covid' capacities. However, what has not been taken into account is the fact that due to a reduction in the councils attention to repainting yellow lines, this leave the door open for illegal parking fines to be challenged, leading to an increase in parking illegally on double yellows at the bottoms of roads generally, which makes driving, in the area, being a pedestrian and a buggy or wheel chair users, already more difficult as the area struggle with the number of cars from residents, without the increased number on match days from outsiders.

In addition:-

-There has been no condition report for the 100+ year old wall that separates the properties, and no reports that demonstrate the affects of the pile driving foundations and additional weight will have on this retaining wall. And if such data exists, there has been no direct communication between the club and neighbours to discuss and disclose that these safety aspects have been considered.

-No permission was sought (or indeed contact made to let us know that it was happening) with regards to oversailing of mine and other neighbouring properties. Indeed, we have found screws from the attachment of the panelling that proves that there was a risk to our property, and this occurred without license or consultation.

-There was no safety hording shielding my property from the works that were taking place on and close to the boundary (which is 2m above the neighbouring property)

-There has been no direct contact at any stage to inform direct neighbours or local resident of any of the works that would affect them in terms of noise, or direct physical issues such as oversailing.

-Trees were removed prior to any wildlife surveys could be done, so any results or reports submitted in this regard are null and void.

The way Bristol Rovers have behaved throughout this process to local residents and direct neighbours has been appalling, and the fact this behaviour and the continuation a structure being built without any of the correct approvals expected of the residential population of the area has been not only unchallenged by the council, it has, in fact, been condoned and actively promoted by the Mayor and his administration has been shocking. This, coupled with the fact that this application (the speed at which it has raced through the planning process compared to residential applications) has at best, led to my complete loss of faith in the council and planning system and at worst made me question the way in which this city is governed, and if the interest of it's citizens (or just the people with the money) are considered.

There are also multiple occasions where residential planning applications have been amended on the recommendation to the council as they would affect the light in neighbouring properties (without even evidential surveys taking place that say they are detrimentally affecting the light in those properties outside of those parameters which are deemed acceptable, as is happening in this case.

I implore you to fairly judge this application and hold it to the same standards as those for residential applications and represent the interests of those neighbouring citizens directly affected in the same way they would when the plans and building works of one residential house affects another.

I also attach images showing the old (below) and new stands (attached) to allow members of the committee to fully appreciate the scope of what's been considered and also invite members of the committee to defer their decision to attend site so the effects can be fully appreciated, and the ramifications words of the reports submitted fully understood.

