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Avon Wildlife Trust

32 Jacobs Wells Road, Bristol BS8 1DR

tel: (0117) 917 7270

fax: (0117) 929 7273

email: mail@avonwildlifetrust.org.uk

web: www.avonwildlifetrust.org.uk

Public Forum Statement by Avon Wildlife Trust for Bristol Parks Forum on Area Green Space Plans

Introduction

Avon Wildlife Trust supports a strategic approach to managing parks and green spaces in the city which is consistent with both national policy and the Council's own policies on wider issues such as nature conservation and green infrastructure. These policies should be used by the Council to reconsider the green spaces currently for sale and designated as Sites of Nature Conservation Interest (SNCIs) and/or Wildlife Network Sites (WNSs).

Designated sites

Fifteen of the sites in AGS Plans are WNSs and/or SNCIs, the majority of which have been agreed for sale for development or disposal. With Sites of Specific Scientific Interest (SSSIs), WNSs and SNCIs comprise the best habitat in the region supporting UK, regional and local Biodiversity Action Plan (BAP) habitats and species. Their survival and management is therefore essential in order to meet national, regional and local BAP targets.

Specific Sites

Whilst the Trust supports the decision that Crow Lane open space (WNS), Lockleaze open space (SNCI/WNS) and Briery Leaze open space (WNS) have been deferred, we question why these sites have been deferred and not removed from the list completely. The Trust urges the council to remove these green spaces which are important for wildlife from the list of sites for sale. Of the sixteen SNCIs/WNSs green spaces considered for sale by Area Green Space plans only one WNS was taken off the sites for sale in the Council's last decision.

Bath Road, Newbridge Road open space, Valley Walk (South), Valley Walk (North), Withywood Park are all WNSs agreed to be sold for development. Portway tip/Daisy Field and Sturminster Close are both SNCIs agreed to be sold for development.

Despite their Wildlife Network Site designation, neither of the special conditions that Begbrook Drive and Arnall Drive open space (South) are being sold under are in support of retaining or improving their biodiversity importance.

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Avon Wildlife Trust is dedicated to inspiring people about wildlife, acting as a wildlife champion, creating wildlife havens and encouraging sustainable living. The Trust is supported by almost 17,000 local members and manages 35 sites as nature reserves. It is a member of the Royal Society of Wildlife Trusts, a federation of 47 Wildlife Trusts covering the whole of the British Isles.

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Arnall Drive (North - Crow Lane) (WNS) and Henacre open space (WNS) have been approved for sale for disposal.

Conflict with National, Regional and Local Policy

National legislation **Planning Policy Statement 9: Biodiversity and Geological Conservation** underlines the need for strategic approaches to addressing development on sites of nature conservation value and subsequent mitigation to result in a net gain of biodiversity. 'The aim of planning decisions should be to prevent harm to biodiversity interests. Where granting planning permission would result in significant harm to those interests, local planning authorities will need to be satisfied that development cannot reasonably be located on any alternative sites that would result in less or no harm. In the absence of this, appropriate mitigation and measures must be put in place.'

The Council's Core Strategy recognises the importance of green infrastructure (GI) in Policy BCS9 Green Infrastructure which aims to 'Protect, provide, enhance and expand GI assets which contribute to the quality of life around Bristol'. This policy sets targets: 'Retain areas of biodiversity importance' and 'Improve management of local biodiversity sites.' These will not be achieved should the sale of these WNSs and SNCIs go ahead without appropriate consideration and/or mitigation to ensure an overall net gain in biodiversity.

The Bristol Biodiversity Action Plan

As stated in BCS9 GI, the Bristol BAP of which the Council is lead Partner, is 'used to guide decisions on protection, enhancement and provision of GI relating to biological and geological conservation'. The Bristol BAP highlights the importance and protection of Bristol's SNCIs and WNSs:

'All of Bristol's SNCIs contain one or more priority habitat. Bristol also supports a network of wildlife corridors made up of both the SNCIs and WNSs, which provide linkages in the network. The WNS may contain priority habitat or have the potential for the creation of priority habitat. **All of these sites receive protection through policies in the Bristol Local Plan, as well as national and international wildlife legislation.**'

The Bristol Local Plan

The Bristol Local Plan continues as the guide for considerations of impacts on wildlife in Bristol's Core Strategy Policy until the adoption of the DPD (currently a work in progress). 'The city's wildlife network will be protected and, where possible, enhanced' *Bristol Local Plan, NE6*. We encourage the council to consider its own policies when it comes to making future decisions regarding the sale of sites of wildlife value. 'Development which would harm the substantive nature conservation value of sites of citywide importance **will not be permitted**, except where the significance of the site for nature conservation is **outweighed** by the importance of the development' *Bristol Local Plan NE5, The Wildlife Network*.

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Sites about which the Trust is most concerned

Bath Road which is currently agreed to be sold for development is a WNS alongside the River Avon. It appears not to be an ideal location for development due to its varied topography and proximity to the river. Its position concerns the Trust with regard to neighbouring new development having adverse effects on the river and its wildlife. The Bristol Local Plan recognises the importance of rivers and neighbouring habitat as of 'major importance for wild fauna and flora' and being 'essential for migration, dispersal and genetic exchange of species'. This WNS provides an essential buffer zone between the A4 (Bath Road) and the

wildlife found within and alongside the river habitat. 'It is vital that the wildlife network is as continuous as possible and that no further breaks should occur; any severance can seriously reduce the nature conservation and landscape value of a corridor' *Bristol Local Plan NE6*.

Lockleaze open space's designation as an SNCI has not been acknowledged by the Area Green Space Plans. The Trust once again wants to highlight the importance of consistency between stated Council policy and Area Green Space Plans. Introducing a play area and housing development to this site would significantly reduce its wildlife value. 'The fragmentation of good wildlife habitats through the loss or reduction of individual sites, particularly as a result of development, is a major problem for nature conservation.' 'Small isolated sites may support fewer species than larger areas.' *3.4.30 NE6 Bristol Local Plan*.

Final position statement

The Trust disagrees with the selling of WNSs and SNCIs for development or disposal in principle. We acknowledge that development in some cases is a necessity, the Trust feels most strongly that the selling of SNCIs and WNSs to improve other open spaces not designated as 'important for wildlife' contradicts the aims and objectives of stated Council policy as well as these national policies. Any money raised in the selling of SNCIs and WNSs should be put back into the enhancement and restoration of Bristol's Wildlife Network following the guidelines of these policies and included under any development plans as a 'planning obligation'.

The Trust would welcome further consultation on the previously mentioned sites to ensure that Bristol BAP targets and Core Strategy Objectives are met, achieving an overall gain in biodiversity throughout Bristol's open spaces.

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