Bristol Parks Forum

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

27th October 2010

Development Management Policies

Please find attached Bristol Parks Forum's response to the draft document on the Ideas for Development Management Policies.

In the attachment the following nomenclature is used:

1. General comments on the content and where we believe changes are needed including additional content are shown in *red underlined italics*.
2. Specific wording changes are shown in **red bold underline**

We thank you for the opportunity to comment on these policies and look forward to your response on each of the areas covered.

Regards

Fraser Bridgeford, Vice Chair, on behalf of Bristol Parks Forum
info@bristolparksforum.org.uk
0791 901 5774

Bristol Parks Forum

Bristol Parks Forum was established by Bristol Parks as an umbrella organisation for community park groups and organisations in the city with an interest in their local parks and green spaces.

The forum is supported by Bristol City Council but acts independently and is currently the only 'community voice' that is dedicated to all of Bristol's green spaces. The forum's three main roles are to:
- offer an opportunity to share ideas and experience
- act as a consultation body for the Bristol Parks service and other agencies;
- influence decision-making, including the allocation of resources.

Bristol Parks Forum http://www.bristolparksforum.org.uk/

Draft Policy DM5

This section should include a link to green infrastructure policies and also mention the physical and mental health benefits of green space.
It should also mention the provision of green space as part of development for the above reasons.

Draft Policy DM6

Open Space

Development **will meet the need it creates for** children's play space, formal green space, informal green space, natural green space and active sports space in accordance with the quantity and quality standards for provision set out in the Council's Parks and Green Spaces Strategy₃. **Commercial developments will contribute towards provision of green space for their employees and customers.**

Trees

The provision of additional trees will **take place** as part of the landscape treatment of new development and when:

i. Opportunities exist through tree provision, to connect the site to the Strategic Green Infrastructure Network, and or Wildlife Network.
ii. It would assist in reducing run-off and flood risk.
iii. It would assist in providing shade and contribute to urban cooling.
iv. The opportunity for additional trees has been identified by council tree officers.

Draft Policy DM7

Where the green infrastructure is covered by Area Green Space Plans, only areas that have been agreed for development within these plans will be allowed.

Important Open Spaces

Development on part of, or all of, open spaces which are important for recreation, leisure and community use, townscape and landscape quality and visual amenity, will not be acceptable unless the **purpose of the** development is ancillary to **existing** open space use **and where applicable has been agreed as part of the Area Green Space Plans**.

The definition of the word ancillary also needs to be unambiguous. Some examples could be shown such as a sports pavilion in playing fields or a café in a park. A better way of putting this would be "Exceptions may be made where development is ancillary to the area such as a small park café or changing rooms on a playing field site.

Urban landscape

Proposals which would harm important features such as green hillsides, promontories, ridges, slopes, valleys, gorges, areas of substantial tree cover, and manmade landscapes will

not be acceptable.

Important features need to be mapped or defined in another way that makes this statement unambiguous. What is it that makes an important feature? Where are they?

Trees
All new development should integrate important existing trees. Where the loss of trees is essential to allow for appropriate development a suitable number and species of replacement trees should be provided in accordance with the proposed Bristol Tree Compensation standard set out overleaf.

A definition of the word important in the above Trees section is required. Is this according to a set of criteria, the judgement of a tree officer or that of the tree forum?

Draft Policy DM9

General Principles for Development
Development which could have an impact upon biodiversity will not acceptable unless:
i. An appropriate survey and assessment of impacts on the biological and geological value of the site has been undertaken and;
ii. The development is designed and sited to avoid any adverse effects on identified habitats, species and features of importance and;
iii. Opportunities are identified and taken to connect any identified on-site habitats, species or features to nearby corridors in the Wildlife Network.

The following section interchanged the terms Importance and Interest in the Sites of Nature Conservation. Can the term be used correctly. We believe it should be Importance.

Development on Sites of Nature Conservation Importance (SNCI)
Proposed Sites of Nature Conservation Importance are shown on the neighbourhood maps which form part of this consultation.

Adverse effects from development on Sites of Nature Conservation Importance will not be acceptable unless any loss, harm or damage can be fully mitigated through on site replacement, creation, enhancement, and management.

The bullet ii. Should be deleted as this is not acceptable.

Development on, or adjacent to, a Site of Nature Conservation Importance will be expected to appropriately enhance the site's nature conservation value through design, placement, and provision of any on-site green infrastructure.

Development affecting the Wildlife Network
Where development is proposed that may affect the Wildlife Network it should ensure that:

i. The connectivity and corridor function of the Wildlife Network is maintained, or replaced.

ii. Habitats and features identified <u>as</u> importan<u>t through</u> <u>a wildlife survey</u> to the function of the existing corridor are retained, or provided in any newly created corridors, to a quality and quantity equivalent to that being lost.

<u>iii Corridors are maintained during the development period until any replacement is put in place.</u>

Draft Policy DM10

Development involving the loss of gardens will not be appropriate unless:

Bullet i. in this section leaves things to open. We don't agree that 'efficient use of land' is an appropriate term to use as it is subjective. This bullet point should be deleted.

ii. The development would represent a demonstrable improvement to the urban design of an area or;
iii. The proposal is an extension to an existing home which would not result in a harmful loss of garden land.
In all cases, any development of garden land should not result in harm to the character and appearance of an area. Development involving front gardens should particularly ensure that the character of the street is not harmed and that appropriate boundary treatments and planting are retained.

A section should also be included under DM10 to ensure that trees are part of the consideration. The table in the trees section on page 360 should be referenced and the wording of 'Trees' section under DM7 should also be included here to ensure that garden trees, which includes some of the most important trees in the city are not lost.

A paragraph should also be included to state that policies DM6 through to DM9 should also be adhered to. Gardens are also part of wildlife corridors, provide food, and have biological diverstity.

Draft Policy DM13

The list of transport schemes listed does not include any schemes for pedestrians or cyclists. It only focuses on rail, road and bus routes. Pedestrian and cycle schemes need to be included. Such examples would include the missing link across the M32 between St Pauls and Riverside Park.

Draft Policy DM14

Development containing existing or proposed Greenways routes will be expected to contribute towards the implementation of the provision of routes. Where development is in close proximity to the Greenway Network, it should be designed to connect with the existing network.

Existing Greenways should be mapped and given the same protection as other open spaces and wildlife corridors. Greenways should be maintained as non motorized routes.