



Bristol Parks Forum

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

Bristol Local Plan Review – Consultation Response

Bristol's green infrastructure including publically accessible parks and green spaces is vital to the City of Bristol and its residents as an economic, social and environmental asset of equal importance to other types of infrastructure.

It will become even more important over the coming years, not just because of the expected growth in our population and demands on our land, but as the impacts of the climate emergency and other crises take effect over the coming years.

Green Infrastructure is also vital to protect biodiversity. For some habitats and species, urban sites that have not been subject to modern agricultural practices, have allowed their survival where they have been lost in more rural districts. Wildlife/green infrastructure corridors throughout the city are also necessary for their long-term survival.

While we accept the need for more housing, the Local Plan needs to have the strongest possible protection and enhancement policies/designations for its parks and green spaces.

Bristol Parks Forum has a Vision for Bristol's parks and green spaces - www.bristolparksforum.org.uk/vision which has been adopted following extensive consultation with our members and other organisations in Bristol.

As part of our Vision we have the following relevant aims to ensure:

- “parks and green spaces can be protected from inappropriate development or use”
- “that everyone can have access to good quality parks and green spaces with appropriate facilities”.
- That we are “protecting and enhancing wildlife, heritage and other natural features.”

We also support the aim set out in the Bristol One City Plan that by 2050 “The people of Bristol need walk no more than ten minutes from their homes to reach excellent quality green spaces.”

We note that the City Council is committed to contributing to the UN Sustainable Development Goals; and that the West of England Nature Partnership is currently progressing work on a Nature Recovery Plan and in particular mapping opportunities to improve connectivity between wildlife sites.

With these points in mind, we would like to make the following points based on the information before us as follows:

- We support the retention of policies on Green Infrastructure BCS9, DM15, DM16 and DM17.
- We support the retention of the existing wildlife, heritage and landscape site designations such as Sites of Nature Conservation Interest, Prominent Hillside and Wildlife Corridor sites in accordance with the above policies. We note that the Public Open Space designation is replaced by Local Green Space and Reserved Open Space designations.
- We consider that all green space is important. While it may not be possible for all green spaces to meet the criteria as applied for Local Green Space and Reserved Open Space; there is a need to ensure that the most robust and consistent application of the criteria is carried out.
- We support in general the proposed policy GI1 on Local Green Space; however we note that this is a new policy which has yet to be tested in the Bristol context.
- We note that the sites proposed for designation as Local Green Space include Destination Parks; Traditional/Multifunctional Parks; Town and Village Greens and Local Nature Reserves – it is right that these should be so designated. Having reviewed the list of proposed LGS, our view is that all those listed do indeed meet the criteria and as such we would object were any of these to be removed from the list in the future. We expect further sites to be added to the list of LGS following consideration of comments received in this consultation.
- In respect of Policy GI2 on Reserved Open Space we have reservations, based on a lack of clarity on its relationship and importance compared to existing green space designation. To assist this a schedule of how the various designations apply to individual green space would in our view be beneficial.
- We note that Policy H5 on Self-Build and community led housing allows for this to be permitted on Reserved Open Space ‘provided the proposal is demonstrably supported by the local community and no deficiency of open space will result’. Further clarity is required on what is meant by local community in this context, both for those areas which are publically accessible and those that are not. Clarity is also needed on deficiency of open space – is that within 500m, the ward, or a part of Bristol?

- We support in general the proposed Policy GI3 on Incidental Green Space, however we note that this is a new policy which has yet to be tested in the Bristol context.
- For both Reserved Open Space and Incidental Green Space forming part of the existing wildlife network, or identified in the developing Nature Recovery Plan as having potential to fill key gaps in the network, this is an important part of their 'open space function'. Policies GI2 & GI3 should include a statement to make this clear, thus preventing loss of green infrastructure that forms (or could form) links in the network.
- We note the policies DS1 to DS14 on individual areas. There appears to be an inconsistency of the treatment of green space between these areas that should be corrected. Sites appear to have been designated on the same basis as for the rest of the city in all these areas with the exception of those within the Western Harbour Area (DS4). We believe that parts of this area would qualify as either Local Green Space or Reserved Open Space. We ask that using existing criteria, areas of green space within this area should be designated as Local Green Space or Reserved Open Space. The impact on these spaces of any proposed development or changes should then be fully considered when proposals are brought forward.

We have encouraged our member groups to respond with their views, especially on the designation applied to individual sites as they have the relevant local knowledge. We hope that you will give careful and reasonable consideration to their submissions.

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