



Bristol Parks Forum

*Campaigning to protect and enhance all public green space
in the City of Bristol.*

See our Vision for Parks & Green Spaces at
www.bristolparksforum.org.uk/vision

RESPONSE TO PLANNING APPLICATION - BRISTOL HEAT NETWORK LOCAL DEVELOPMENT ORDER – PLANNING APPLICATION 22/05628/LDO

The Bristol Parks Forum is writing to object to the above Application on the basis of the extensive powers which are being considered to be used. The Forum is also seeking changes to the Order itself.

The Bristol Parks Forum is the only community voice dedicated to all publicly owned parks and green spaces in Bristol. We work with Bristol City Council to ensure our spaces are well looked after and to help local groups to enhance their green space.

Further information about the Forum can be found at
<http://www.bristolparksforum.org.uk/>

Grounds of objections and alternative approaches

We appreciate the intended outcome of the use of these powers to potentially tackle serious issues for our city, including Climate Change.

Our objection relates to the extent of those powers; and how the Council, or any associated company/organisation, and/or contractors are likely to use them.

In considering these we have found it challenging to consider the exact implications of the proposals on individual, or even groups of parks and green spaces, without further information as to what is involved, over what timescale in a specific location.

Parks and Green Spaces are acknowledged as critical to our health and well-being; and provide many positive benefits to people and wildlife.

Under the Order important areas of green space for the City and local communities (such as Victoria Park, Doncaster Road Playing Fields, Parts of Eastville Park, Redcatch Park, Lawrence Weston Playing Fields) are within the areas covered by the Order.

Extent of the powers

The powers as they stand come across as allowing parties to be able to do what they need to do without too many checks and balances.

There have been examples of infrastructure and related permanent structures (eg: phone masts) being sited, or proposed to be sited, inappropriately for the functions and purpose of the park or green space.

They become an intrusion, leading to a reduction in the way that those spaces are used and enjoyed.

To avoid this, additional conditions must be applied, or guarantees sought, that the following will be carried out before, during and after construction:

- 1) An analysis of purpose and functions of the individual park and green space (or parts of the park and green space) provides for people and wildlife is carried out, so that the effect of the proposals can be assessed properly. Such an assessment can cover economic, social, environmental and cultural aspects. This assessment would be wider in scope than the current proposals which are focussed on purely formal designations.
- 2) The design will minimise the negative impacts on the purpose and functions of the park and green space involved. Examples of measures to avoid and minimise negative impacts could include avoidance of features such as trees and hedgerows; especially if those features are ancient, historic, veteran, or culturally significant; or have legislative or planning policy protection.
- 3) A construction management plan is prepared. See a condition example in the Conditions and Reasons and Advices 2017 document. Examples of potential ways the Plan would be of assistance is specifying the siting of construction compounds outside of the park or green space; ensuring adequate crossing points are provided across routes so that parts of the park or green space do not become isolated and paths (formal and informal) are not obstructed; and scheduling works when fewer people use the space. See also Points 2), 3) and 4).
- 4) Construction of the infrastructure, and its ancillary works is carried out in a manner so to minimise the negative impacts on the purpose and functions of the park and green space involved. See also points 1), 2) and 3) above.
- 5) Restore the relevant areas back to their original condition or better.
- 6) Enhance the park and green space affected as part of the proposals.

It should be noted that there is already a legal duty on Local Authorities to enhance biodiversity, reinforced by the Environment Act 2021. Condition 5 needs to change to reflect this. Is it now legally acceptable to just to aim for “no net loss” of biodiversity?

Use of the powers

We are opposed to the potential for a one size fits all approach to how the powers are to be applied.

Each park and green space must be carefully considered, in line with the points above.

Even more importantly, consultation with local communities (including parks groups) from the start of the design of proposals, construction and into maintenance, must be carried out. Often local groups have detailed knowledge of how a park or green space works and potential constraints. These are often more detailed and more up to date than sources of digital information searched when drawing up proposals.

The text of the Order, or Statement of Reasons, must be changed to reflect these two points.

Finally, we ask that all monies from CIL (or its successor if brought forward) or S106 agreements are spent on the park and green space affected.

We look forward to hearing about when the application is going to be considered by a Development Committee, as we may wish to attend and address the meeting.

Len Wyatt

Chair
For the Bristol Parks Forum

19 January 2023