



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

Dear Bristol City Council Local Plan Team.

CONSULTATION ON BRISTOL LOCAL PLAN REVIEW: DRAFT POLICIES AND DEVELOPMENT ALLOCATIONS, NOVEMBER 2022

The Bristol Parks Forum is writing to respond to the above consultation.

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/>

Our Approach

Our response to the consultation has been driven by the following considerations. These considerations have increased in importance to us, since the previous Local Plan review consultation in 2019.

- 1) Increased importance of parks and green spaces to people and wildlife
- 2) Declarations of climate and ecological emergencies by the City Council
- 3) Increased recognition of the health and well-being benefits of parks and green spaces.
- 4) Recognition that in some areas the lack of green space, or the increased use of existing parks and green spaces has, and will increasingly have, a negative effect on the health and well-being of our City and its inhabitants.
- 5) There is a need to ensure that developments contribute to sustainable communities, with a full range of services and facilities in support of new homes. Services in this context can include new parks and green spaces.

The importance of parks and green spaces, is now better understood than ever. Parks and green spaces are critically important in times such as during the Covid-19 pandemic when they were used by many people to improve their health and well-being. These areas are also important for their role in

providing areas which can be used for activities such as play, nature education, foraging for food, running, walking, walking the dog, socialising and learning new skills etc.

Our response:

Informed by the above approach we raise the following overarching points, which should be read alongside the detail text changes proposed in Appendix 1 at the end of this letter. The detail changes start the process of applying these points to the Plan.

- 1) The protection applied to Allotments must be applied to all existing parks and green spaces. See Para 8.6 of the consultation document which states (our emphasis) “In addition, it will ensure that all existing allotments, including those not owned or operated by the Council, *receive the recognition they deserve and are secured from future development*”.

With one exception that development that supports the function and characteristics of that park and green space would be considered.

- 2) The approach that you can mitigate the negative impacts of a development on parks and green spaces by providing a better park or green space must be dropped.

There should be no loss of parks and green spaces due to development.

This position is based on the evidence of ever-increasing pressure on existing parks and green space as our population continues to increase generally, along with the numbers of people using individual parks and green spaces as new homes are built nearby.

- 3) There must be new parks and green spaces created. From high quality green spaces as small as pocket parks, to a new large, high-quality park and green space in Central Bristol.

In the Central Area with the dramatic increase in homes in the area as retail and industrial areas are changed to more mixed uses; existing green spaces (like Castle Park, The Dings, Sparkes Evans Park and Brandon Hill) will not be able to provide the benefits to people and wildlife that are needed.

The Plan must be written to enable these changes to happen.

Developers must be required to facilitate new public parks and green spaces, through policies which mean that land within their ownership is designated for public parks and green spaces. Developers should also provide funding to support them.

- 4) The phrase parks and green spaces, needs to be used alongside “open space/public realm” because the benefits that public parks and green spaces provide are different and more extensive than the “traditional” urban hard landscapes that tends to be provided as open space/public realm. Developers must be made aware that there are other options to “open space/public realm”.
- 5) It is critical that all regeneration areas are described with the same level of detail. Not to do so would in our view seriously compromise the robustness of the Plan.

OTHER ISSUES FOR THE FINAL DRAFT PLAN:

We call for the following actions to be carried out:

- 1) The allocation of the LGS designation to be reviewed, so that it includes all publicly owned and private parks and green spaces.

This should also include those areas left after development has been carried out on the original green space as a result of the previous Local Plan (2011/14).

- 2) Further clarity to be provided on the relationship between all of the BG policies mentioned in the current consultation, and retained policies (or parts of retained policies) such as BCS9 (Green Infrastructure), DM16 (Open Space for recreation) and GI 1 – 4 (Green Infrastructure).
- 3) Clarity provided as to how the Green Space standards in DM16 interact with the proposed GI and BG policies; and consideration given to whether there are ways of using criteria to improve the provision of parks and green space.

This letter has been copied to:

Cllr Ellie King, Cabinet Member for Public Health, Communities and Bristol One City; and
Cllr Nicola Beech, Cabinet Member for Strategic Planning, Resilience and Floods

Yours sincerely,

Len Wyatt
Chair
For Bristol Parks Forum
20 January 2023

**Appendix 1 – Bristol Parks Forum response to Local Plan Review Consultation January 2023.
Detailed text changes proposed.**

Part of the document	Text locations and explanation.
<p>Vision - Pages 7 to 8</p> <p>3.4</p> <p>3.5 and 3.6.</p> <p>3.7</p>	<p>3.4 – add public parks and green spaces – not just open spaces/public realm as public parks and green spaces can provide even more benefits than open spaces/public realm.</p> <p>3.6 – last point to be expanded to include definition – including parks and green spaces.</p> <p>3.7 –</p> <p>Add - New point - Include parks and green spaces as a core objective. Public Parks and Green Spaces – not just public open spaces.</p> <p>Page 9 point 3 - It is not just about protection of – but enhancement too.</p> <p>Last point – Public parks and green spaces can tackle the challenges. Change text to through the provision of parks and green spaces.</p>
<p>Housing – Page10</p> <p>Para 4.7</p>	<p>Green field sites do more than provide recreation, sustain/enhance biodiversity and food growing. They can provide benefits for people’s health and well-being, climate change amelioration and adaption etc, see Para 6.71. Please expand text to include full range of benefits.</p>
<p>Net Zero and Climate – Pages 16 to 33</p>	<p>NCZ1 – Needs to include point on the value of green and blue infrastructure to climate adaption. Use must rather than should.</p> <p>NCZ4 – Use must rather than should. The Forum supports para 6.71.</p>

	6.74 – include creating new public parks and green spaces.
Biodiversity and Nature Recovery - page 34 to 43	<p>The Forum supports some aspects of these new policies, realising that they are evolving from the Environment Act 2021.</p> <p>7.3 Point 2 – identifying and protecting – add enhancement.</p> <p>Add new point about acknowledging the benefits of nature recovery and biodiversity.</p> <p>BG1 - policy text – add requirement to monitor for success and need to apply adaptive management/replacement mitigation.</p> <p>We do not believe that the list in the policy text is ambitious enough.</p> <p>Add create a new public park or green space.</p> <p>7.9 – Last sentence change to “will contribute”.</p> <p>7.10/11 - There needs to be clarity on the role of the West of England Green Infrastructure Strategy and Nature Network in the policy; especially before the Bristol equivalents are ready. Should they be used pending the publication of the final Bristol equivalents?</p> <p>7.15 – Please provide a clarification of what is covered by local nature conservation interest.</p> <p>7.25 – Clarification needed of the length of time to be covered by the management plan. It should be 30 years to match requirement to manage BNG.</p> <p>7.29 Please strengthen commitment to monitoring, feedback and enforcement.</p>

BG2 – this policy is open to significant variation in interpretation – eg: what is mitigation – Please define mitigation.

Clarity is needed on the role of ecological connectivity in decisions about whether the proposed mitigation is going to enable the requirement for a nature network to be maintained and enhanced.

There needs to be a statement about providing compensation and enhancement as well – in line with existing and future legislation (eg: Environment Act 2021) in the policy rather than at 7.26.

BG3 – Policy Text –

Change text to “all new development will be expected”.

Biodiversity Gain Mitigation Hierarchy – change wording from “should” to “will” and delete “where possible”.

Please take forward a minimum of 15% BNG

We are opposed to providing off site benefits away from local area, in urban areas green space is of value to local residents health and well-being; and wildlife, in ways that providing such benefits outside the local area cannot provide to the same people.

BG4 – There is a need for a policy which enables long standing issues about trees in the urban context to be resolved. Examples of this relate to planting the right tree, in the right place; considering native species first; avoiding the use of imported trees/plants to avoid importing pest and diseases; and best practice in relation to safeguarding trees planted in grey infrastructure/hard landscaping.

	<p>Policy Text - Clarify how the table provided with a replacement value for trees over 80cm in girth, link into the protection of ancient and veteran trees – is there a conflict there between the two?</p> <p>BG5 Policy Text</p> <p>Add text to support for new parks and green spaces alongside Bristol’s waterways.</p> <p>While this policy does not involve community consultation/engagement issues, we would like to highlight the need for consultation on cycling and walking infrastructure provision in parks and green spaces.</p>
<p>Food Sustainability - Pages 44 to 48</p>	<p>Policy FS1 – Please add words that off site provision or financial contribution benefits the local area of the development, rather than be used away from the local area..</p> <p>8.8 Please define large developments. Clarify how this policy applies to blocks of flats/tall buildings.</p> <p>Policy FS2 – Please define appropriate size and quality.</p> <p>Policy FS3 – What is meant by “unacceptable impact” please clarify. Or replace with “have any unacceptable impact”.</p> <p>8.27 – line 4 – Change text to Policy “will”.</p> <p>Add – new statement that will ensure that the provision of formal allotments is not at the expense of the extent or quality of existing parks and green spaces.</p> <p>There needs to be a list and map of existing food growing enterprises covered by the policy FS3 to help with understanding of what is covered or not.</p>

<p>Design – Pages 60 to 65</p>	<p>There needs to be a clearer statement of how existing and future parks and green spaces contribute positively to a “well – designed place” “health and well-being and “liveability”.</p> <p>Policy Text DCA Please add a new policy where creation of new parks and green spaces is allowed – rather than “public realm”. See policy on public art and cultural activity as a comparison.</p> <p>10.18 Advertisements – Please add a new point in policy DC B that advertisements will not be allowed in parks and green spaces, in the interests of health and well-being, negative effects on the characteristics and functions of the park/green spaces; and people and wildlife.</p> <p>Appendix 3:</p> <p>Built form, movement and public spaces. Page 90</p> <p>Please add – a new point about the need to undertake an assessment of character and function – as well as features, of parks and green spaces.</p> <p>Nature and Homes and Buildings – Add text that they must respond to the ecological emergency. Quote benefits of green space to people and wildlife; link to One City Targets etc. (see 6.71 above).</p>
<p>Locations for development – Pages 67 to 72.</p>	<p>Please clarify how the City Council’s “Golden Motion” on green spaces last year has influenced/changed the Local Plan.</p> <p>11.4/11.8 Bath Road/Elsbert Drive – see discussion on our position above.</p> <p>Text needs to cover all relevant policy and legislative requirements.</p>

11.10 Biodiversity gain emphasis – needs to be complemented by clarity on what is meant by other policies and any legal requirements.

11.12 – 11.13 We welcome the retention of Yew Tree Farm

11.16 – 11.19 Western Slopes – It is important that the Council rejects the planning application on part of the Western Slopes.

11.17/11.20 – Silbury Road/ Brislington Meadows – as Western Slopes above.