

Re: BCAP – Bristol Tree Forum response – cover letter

You will find our detailed response on pages 2 to 4. In this cover letter we just wish to put the case for including more in the BCAP about Green Infrastructure. As the BCAP stands we feel you are letting the people of Bristol down.

Your BCAP document sets the policy for the development of a critical part of Bristol during a critical time period. Evidence shows the benefits of trees and GI to making cities more resilient to climate change. This is even clearer now than when the Core Strategy was developed. Additionally there is plenty of evidence that trees make for a more thriving city; for retail and other businesses as well as well-being improvements to residents. But back to climate change; the centres of cities will be worse hit due their tendency to be low lying (water flowing towards them), higher population density and intense use of man-made materials. So during the period 2015 to 2026 it is critical to get the balance towards better well-being of the inhabitants and workers in Bristol's Centre. The last paragraph in the vision on page 1 of BCAP is great and GI can underpin many of these goals but the rest of the document doesn't follow up. Even within the vision, GI is still only mentioned in the final paragraph. (As per the document of Feb 2012). To an observer it reads like, "OMG! We have just won EGC2015, we'd better put GI in."

The rest of this current BCAP document seems worse than the Feb 2012 one. In that one at least 11 out of 14 Community Involvement sections requested trees and GI. In this one the community involvement has gone and there are only a few mentions of trees and some of those are about removal.

We fear that this step backwards just reveals Bristol's lack of green ambition within the Planning Dept. This document has some good words and 6.13 sums up the problem well: Not much space so must take every opportunity during developments. We completely agree with this. But everything following fails to live up to the vision within those constraints. In the BCAP new trees are mentioned on just four occasions, in the vision, along watersides, Newfoundland Way and Redcliffe Way. Other tree mentions refer to threats of removal. You back away from any commitments (see later comments on: 6.25, 7.15-7.18, BCAP36 – 38 and 40). I'm sorry but it has to be said and come 2026, people will look back at this lost opportunity.

On page 2 we give an analysis of the current tree canopy of Bristol's Centre. We ask where is your analysis about how we will get to where the city needs to be? BCA is still far short of what is needed in GI terms to keep the central area habitable for the vulnerable during extreme heat events. We need to add another 0.3km² (300 hectares) at least of GI. How are we going to do that? It's not in this BCAP document. There are no targets nor commitments nor standards. Perhaps you are relying on the Core Strategy alone? If so I fear that is misplaced. It has been in for 2 years and so we can see if that is working now to increase GI? We don't think so, here are two pieces of evidence: The BCAP Annex describes 39 opportunities for development. At least 2 of these sites have already gone through Planning (Wilder St, SA504 and General Hospital, SA611). We have followed these carefully. The former will involve the eventual felling of 3 large and still growing lime trees in Brunswick Cemetery Gardens. There is provision for mitigation planting but it won't be enough to replace that lost canopy. The latter was 8% canopy and will eventually grow to 8%. So two down and no improvement in GI on either of them, I see nothing in this BCAP that encourages me that any of the 37 others will be developed in a better way.

So in conclusion this BCAP is a step backwards for the people of Bristol. We feel each relevant section should refer to the BCS9 policy of enhancing green infrastructure. This BCAP is discredited, it would be easy for an observer to come to the conclusion that you do not care for the people of Bristol; just for the developers.

Yours faithfully – Clive Stevens (Chair, Bristol Tree Forum)

Bristol Tree Forum's response to the Bristol Central Area Plan Preferred Options – Clive Stevens (Chair BTF) 14.10.14

The BCAP policy document is (i) to apply the principles of the Core Strategy and (ii) to achieve its own vision for 2026 (p1); we believe that it fails to do this.

Context: The BCAP document sets the policy for the development of a critical part of Bristol during a critical time period. Evidence now shows clearly the benefits of trees and Green Infrastructure to making cities more resilient to climate change. This is even clearer now than when the Core Strategy was developed. Trees also make for a more thriving city; for retail and other businesses as well as well-being improvements for residents and workers.

The BCAP should build on the high level policies for development set out in the Core Strategy and Development Management Principles. It should also include the city's aim of increasing the tree canopy and give it weight in planning decisions by including it in the Green Infrastructure policies; it is therefore important that this is made part of the city's planning policy especially in the Central area where opportunities to increase tree canopy are very limited.

During the period 2015 to 2026 it is critical to get the balance towards better well-being of the inhabitants and workers in Bristol's Centre. The vision should include the protection of existing green infrastructure assets as well as planting of trees and urban greening

The preferred option BCAP document has watered down the community involvement input on the need for trees in the central area in the Feb 2012 document.

The current tree canopy of the City Centre is approx. 9%. Water accounts for another 6% or so, parks and green spaces about 10% (in which sit many of the trees). The annex lists 39 sites allocated for development which account for about 4% of Bristol's Centre.

Bristol Central Area is still far short of what is needed in green infrastructure terms to keep the central area habitable for the vulnerable during extreme heat events. We need to add another 0.3km² (300 hectares) at least of green infrastructure. There are insufficient policies and standards in this document or the annexes which will enable planning decisions to be made which will ensure this. Despite the fact that Core Strategy and Development Management policies will apply to this area, we feel that, in order to give greater weight to the need to improve the green infrastructure in the central area, specific reference should be made to this in the BCAP document.

Specific comments: (suggested BCAP wording changes in red)

6.25 **BCAP25** sets out the policies for green infrastructure

Development will be expected to incorporate any or all of the following design features:

- Green roofs and roof gardens;
- Living walls;
- Street trees and other trees;
- Water features linked to SUDS;
- Waterside landscaping where appropriate.

This should be amended to read:

Development will be expected to incorporate **as many as possible** of the following design features

- Green roofs and roof gardens;
- Living walls;
- Existing and new** street trees and other trees;
- Water features linked to SUDS;
- Waterside landscaping where appropriate.

7.15 – 7.18 Car Parks. Car Parks are a major opportunity to add to the green infrastructure.

Preferred Option version:

Policy BCAP 29. Design of car parking in Bristol City Centre

All parking, including on-street and off-street provision, should be finished to a high standard of design that preserves or enhances its context.

This should be amended to read:

Policy BCAP 29 Design of car parking in Bristol City Centre

All parking, including on-street and off-street provision, should be finished to a high standard of design that preserves or enhances its context **and contributes to the green infrastructure.**

9.2.5 **BCAP36** (Shopping areas) no mention of green infrastructure despite evidence that trees increase the vitality of shopping areas.

Development across the Bristol Shopping Quarter will be encouraged to implement innovative design solutions finished with high quality materials whilst respecting the surviving historic and landmark buildings and reflecting, where appropriate, the historic development of the area.

Amend the policy to

Development across the Bristol Shopping Quarter will be encouraged to implement innovative design solutions finished with high quality materials whilst respecting the surviving historic and landmark buildings and reflecting, where appropriate, the historic development of the area **and contributing to the green infrastructure of the area.**

9.3.2 **BCAP 37** (St Mary Le Port). Policies at 8.5 are about a Legible, Restored and Reinvented city.

Restoration is where “significant historic building fabric and street pattern remains”. In Castle Park this does not exist. It was destroyed. Using your own policies it is therefore appropriate to reinvent the city in this location NOT restore it.

This is our committee’s view on this: “The TreeForum currently objects to the preferred option stated in the Bristol Central Development Plan (s.9.3.2) for the redevelopment of St Mary Le Port. We object due to the large loss, up to 44, mature trees with this option. We understand that the trees will be replaced at a ratio of 10:1 (Mayor stated this on 30/9/13) but we don’t see how approximately 440 new trees can be planted in central Bristol. The Centre is where they are most needed for climate change mitigation but finding all these new sites will be exceedingly difficult due to lack of appropriate spaces. We would welcome an analysis of where such pits could be located. BCS9 states that development should retain existing trees wherever possible. We have not been persuaded that the options that would retain some or all of the trees have been properly considered”.

We understand that work has been done on identifying street tree planting locations in the old city. This should be included to show whether it is feasible to replace any street trees lost in this area. Our experience is 80% of such “opportunities” fail mainly due to services or sight lines. However we argue that whether we need 100 or the full 440 planting sites, if suitable locations for new street trees can be found then, those sites should be used for additional planting in addition to retaining the High Street / Wine Street trees in order to achieve the increased canopy cover aimed for. Losing the 10 street trees on the High St / Wine St bend alone would take out approx. 2,000m² of canopy, a loss of 0.05% of the Centre’s total land area. Planting 100 new trees to mitigate their loss could eventually add 0.2% canopy (about 40 years) if they are allowed to grow to maturity without pollarding and wouldn’t that be more effective and in keeping with BCS9 if it were additional to keeping the Castle Park trees and not instead.

In answer to your specific questions on BCAP37:

To bring forward a well-designed and viable scheme should the area proposed for development fall within the boundary indicated on the aerial photograph below? **NO the area has been designated important open space and there was cross party agreement to protect open space and not dispose of any for development.** Are there other options which should be considered? **YES OF COURSE. We are not designers but have been told of other ideas which you will hear no doubt, these include (a) retaining the green space and the trees**

in it to contribute to the environment of the central area of the city.(b) creating a farmer's market and/or retail market area within the existing green infrastructure. Possibly adding an orchard too.

To enable the narrowing of High Street and Wine Street closer to their historic proportions should any existing street trees be removed and replaced elsewhere? **NO** The trees affected are all well-established plane trees, providing significant benefit in respect of urban heat island and air quality.

Are there other options which should be considered? **YES-** retain the trees which contribute to the environment and to the attractiveness of the area, and use them as an asset to encourage the expansion of the St Nicholas Market retail area.

9.4 **BCAP 38** No reference to Green Infrastructure-

☑ Public realm improvements along Quay Street/Nelson Street to include activity nodes/public spaces at Christmas Street and Bridewell Street including space for ground floor uses to spill out, and improvements to the pedestrian/cycle environment;

Amend to include green infrastructure

☑ Public realm improvements along Quay Street/Nelson Street to include activity nodes/public spaces at Christmas Street and Bridewell Street including space for ground floor uses to spill out, and improvements to the pedestrian/cycle environment **and green infrastructure**;

9.6.5 **BCAP 40** (Redcliffe Way)

☑ Enhancements to the quality and accessibility of the network of green spaces in the area;

Amend to include green infrastructure:

☑ Enhancements to the quality and accessibility of the network of green spaces and **green infrastructure** in the area;