

## **Bristol Parks Forum response to the Bristol City Council Parks & Green Spaces Strategy 2024-2039 and Food Growing and Allotments Strategy Consultation**



Bristol Parks Forum (BPF) 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/>

The Forum's Vision includes the following outcomes for parks and green spaces in 2030, which are that they are:

- Excellent in terms of quantity and quality
- Available in all areas of the city
- Places that have a positive influence on our well-being
- Hubs of activity that empower local communities
- Recognised for their value to the city
- Free to access
- Places where wildlife thrives
- Places where our heritage is protected and explored.

Our comments have been presented according to the order of the PGSS and range from strategic matters to suggestions to improve clarity.

The key points we would like to stress are that the Parks Forum:

- Welcomes the production of the strategy and supports the ambitions and aspirations of the plan and looks forward to a continuing positive relationship with the City's Councillors and officers responsible for all aspects of Parks and Green Spaces the positive engagement of the Cabinet Member and Officers with the Forum
- Is concerned that the strategy's Key Actions do not clearly deliver the Strategic Principles, Strategic Priorities nor Key Commitments consistently and robustly.
- Propose that Chapter 7 Implementing Our Strategic Vision – Key Actions is transferred to a new Implementation Plan which can responding to changing context and be effectively tracked.
- Propose that the Food Growing and Allotments Strategy is removed from PGSS document.
- Propose that the promised "Big Conversation" on the future of parks is undertaken with a wide group of stakeholders to address the challenges of future funding in a positive way.

### **Bristol Parks Forum welcomes the publication of a Parks and Green Strategy for Bristol**

BPF welcomes the consultation version of the Bristol Parks & Green Spaces Strategy (PGSS). It has been anticipated for the past 2 years and the Forum is therefore pleased that it has been published with intended adoption in the 2023-24 Council year.

However, after waiting so long for the consultation document to be published we feel that both the consultation timing and timetable (particularly encompassing the Christmas period) has placed an unacceptable burden upon the Bristol Parks Forum members. It has been difficult to consult and support our members at the same time as responding to the Council's consultation on the statutory Local Plan, which is critical to the protection and future provision of Bristol's Parks and Green Spaces. Bristol Parks Forum members are all volunteers with other commitments and calls upon their time.

This is not our paid job and our voluntary work in parks and green spaces including responding to consultations has to be done in what spare time we have. We consider that we have had inadequate time to respond and this response therefore may not be as comprehensive as we would have liked.

Overall the Forum considers that the ambitions and aspirations for Bristol's Parks and Green Spaces Strategy are laudable, and are in accordance with our own Vision.

Whilst welcoming the Strategy we would however flag up concerns regarding deliverability, particularly in terms of resources – finance, staff, etc – and also in terms of managing the competing demands upon the finite resources of the city's parks and green spaces.

Concerns have been raised about how different competing uses of land in Parks & Green Spaces will be managed. Park land is finite yet the PGSS is suggesting more uses within an already over used estate in most areas.

We particularly welcome the aspiration to see an increase in the area of land for Parks and Green Spaces but recognise that this needs to be embedded in the statutory Local Plan as the only new land that will be available for such park creation will be on existing, mostly brownfield development sites. Given the level of need there needs to be significant public parks and space within these proposals.

We welcome the recognition of a need for new, additional public green spaces. However, the references to the development sites within the inner city; Temple Quarter, Frome Gateway and St Philips Marsh, do not reflect the current situation in that consultations on the frameworks for first two areas have already been undertaken. BPF has made it clear in responding to the consultations that there is insufficient public parks and green spaces provision in the proposals.

We understand that the way in which new parks can be achieved through new development is by requiring them through the statutory planning process and therefore the requirement for publicly open and accessible to all parks and green spaces must be enshrined within the Bristol Local Plan and any other relevant planning and policy documents.

The Local Plan is also aligned to the local authority's policies and plans and therefore the Bristol Parks and Green Spaces should clearly show that the Strategy required new publicly accessible Parks and Green Spaces to the quality, quantity and distance standards within the Strategy. Importantly it should state the unequivocal need for a large public park open to all within the inner urban area, within the St Phillips development area.

The size suggested in this Strategy for a new public park in the inner city is not large enough to offer a wide enough range of activities that our public parks need. A new park needs to be able to provide much that is embodied in the priority themes of the PGSS – including both play spaces – formal and informal, and quiet areas that also contribute to the city's nature recovery and help fill the gap in habitat network in the city centre.

## Considering the PGSS by Chapter

### Chapter 2 Strategic Principles

We support the Priority themes but not the embedding of the Allotment Strategy into the PGSS.

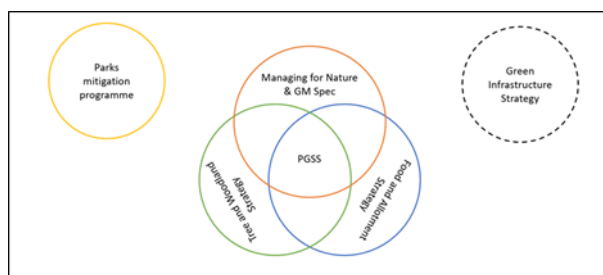
**The Food Growing and Allotment Strategy** should not be within, nor embedded in, the Parks & Green Spaces Strategy (PGSS) Chapter 4 clearly states that the PGSS is a strategy for land that “offer[s] full public access. There are other green spaces managed by the council that are not included because they do not offer full public access for recreation, such as green space on housing estates, roadside verges and school playing fields”

Clearly formal Allotments do not fit the criteria of offering full public access but indeed are quite the opposite and they are rented to private tenants, are locked and the public is prohibited from accessing them unless they are a tenant or co-worker. The formal Allotments are also covered by statute, namely the Allotments Act 1950 and their access and usage is by rent and contractual agreements.



In February 2021 the Bristol Parks Forum received a presentation from the Council in which the relationship between the Council’s work was shown on this diagram

<http://www.bristolparksforum.org.uk/BPF130221PGSSOverview.pdf>



In March 2023 a subsequent presentation from Council Parks Service provided this venn diagram

<http://www.bristolparksforum.org.uk/BPF110323Strategies.pdf>

In each case the Food and Allotment Strategy was shown as having relevance and cross over with other Council Strategies in development, including the Tree & Woodland Strategy, but all of them separate.

The presentation also included “Workstream timelines” and this clearly showed the strategies as being separate and having difference time lines.

The Allotment Strategy needs to be aligned to Allotment Rules, Guidance, Tenancy Agreement and Allotment Transitional Arrangements. The Allotment rules are clearly contrary to the goals of the PGSS in terms of managing for nature aspirations and commitments, tree canopy, equalities and the collaborative and community focused approach highlighted across the PGSS.

We support the use of Council land for food production in a variety of ways across the Parks and Green Spaces of Bristol, where it is appropriate and provided that this then also maintains public access to the Park or Green Space. With that in mind the better solution would be to have a separate Food and Allotment Strategy, with references to Food Growing generally in the Parks and Green Spaces Strategy.

### Chapter 3 The Bigger Picture

Following the 2022/23 Bristol City Council Budget Consultation and public opposition to funding cuts to Parks and Green Spaces the Council agree to engaging with Parks stakeholders in a “Big Conversation” about the future of Parks. This has yet to happen. Despite a lot of references to collaboration, community, partners and stakeholders in the PGSS there is no explicit reference to the Parks & Open Spaces Big Conversation which we were promised. We believe that there is still value that approach, and so ask for it to be added to the PGSS as a short term action along with an approach and a timetable for it to be actioned. We note that in responding to questions regarding the role of the Big Conversation in PGSS the Parks Service looks forward to how this will be developed and also wishes to be part of it.

Bristol Parks Forum is concerned about the fragmentation of substantial and long-term elements of the responsibility for the stewardship of parks and their future funding. This includes to multi-purpose enterprises which will always have intent to prioritise their resources, which in any case are largely earned from short term contracts and charitable funding – both of which are diminishing on the macro scale and subject to increasingly intense competition locally.

Effectively this could mean:

- The prioritisation challenges with BCCs budgeting could be “delegated” (or “dumped”) onto the community sector which is even less able (and accountable) to manage this issue for wider public good over the long term.
- Over time this will lead to the inequitable distribution of the benefits that parks bring to our already unequal society, as some organisations will be in a better position to finance their parks development than others.
- Localised charitable type bodies are increasingly ambiguous in terms of their local roles (e.g. are they really public service? Are they “preferred providers”? Without transparency over terms and procurement etc., they can easily become gatekeepers as much as gate openers within their communities and not focus on community concerns that do not fit their business plan. There is the potential for this to lead to the “privatisation of space” etc. for very localised commercial reasons, and lack of genuine community and public accountability. This includes fiscal accountability (as trustees are responsible for and to the organisation, not directly their community. Furthermore, funders are often ultimately responsible for service priorities by targeting what they want to procure, even if expressed in terms of outcomes)
- We are wary of an approach that is not strategic which does not distribute income from commercial activity in Parks widely enough, nor is able to cope with long term capital and maintenance issues. These are key reasons why we want the Parks service to remain in the public domain.

We fully support the empowerment of Friends and similar groups of community based stakeholders, who we hope would become Friends groups, not necessarily of the same template as current models, and be part of the processes of maintaining and revitalising our open spaces. To be resilient, Friends groups need a dependable, proactive partner and long term, ambitious capacity building and support. Whatever they are called these community based organisations will likely die and revive or be replaced over a relatively short amount of time, be dependent on the passions of key people, be in competition with each other over grants etc., at times and/or maybe in competition with each other over priorities for the space (e.g. play kit, wilding, sports fields). They, and their neighbourhoods/communities of interest need a senior public body to help ensure and account for alignment with public interest, as well as financial resilience of the park, not just the community group etc. Proper strategic stewardship of the whole will empower collaboration to meet defined public benefit objectives, without it competition among small players will hamper partnerships and lead to fragmentation of benefits to the community.

The actual nature of that public body is a real question, and one that deserves debate, especially as the accountabilities of local government are getting more onerous and their powers are being restricted. These concerns are part of the drive for a Big Conversation: not that there is a template ready for us but we must step back from Elastoplast solutions for a while and think strategically and systemically.

The Big Conversation we have been asking for was specifically to help our wider stakeholders community engage with such underlying challenges in a positive way. Bristol is a city rich in social, intellectual and economic capital and well connected, with a lot of ambition to meet the C21st challenges. We should lever in that capital to explore and test how we can best meet those challenges. Bristol City Council must be seen to take a leadership role and invest in the success of the process:

- Clarify and communicate the value of our public parks etc., in ways that excite engagement within the general public, not just specialists, for instance as a commonly held asset that we can contribute to, rather than just a vulnerable service.
- Allow full access to the wider city stakeholders, both users and potential funders – civil society, commercial, social and public bodies with overlapping interests in the present and potential benefits of parks.
- Engage its own various competences and forms of engagement – e.g. community development, equalities, property, care, transport, planning, and
- Through a work programme that explores ways in which we, as a city can support our public parks, not only as they are but as we will need them in the future.

#### **Chapter 4 What Space is Included in this Strategy?**

This section lists a confusing mix of land included and excluded from the PGSS based on Council land ownership and public access. The rationale for this scope is not clear.

We consider that allotments do not belong in this strategy and a rethink is needed. Therefore the allotment land and any other private rented land for food growing / animal husbandry should be removed from the map.

#### **Green Space Provision Standards Quantity, Quality, Distance**

It is unhelpful that there is a separate document linked from the online PGSS Consultation Survey that is not included in the Strategy itself.

[https://files.smartsurvey.io/3/0/A8FJBCJC/PGSS\\_Provision\\_standards\\_proposals.pdf](https://files.smartsurvey.io/3/0/A8FJBCJC/PGSS_Provision_standards_proposals.pdf)

We note that that document's Appendix lists amongst land that is not considered open space for recreation, allotments, grazing land etc. alongside other land that does not have legitimate public access and feel that this should also apply to the PGSS in its entirety.

In the PGSS there is also no mention of nor link to the maps that are included in the online survey

<https://bcc.maps.arcgis.com/apps/instant/portfolio/index.html?appid=d8ff593a28b84ac8afa9fca647f0fd09>

Open space standards only apply to open spaces which are always publicly accessible so should only be those on the map. If needed a separate allotment standard might be needed in the separate Allotment Strategy, but that might need to meet the requirements of the Allotments Act as there are statutory requirements regarding provision of allotments.

The PGSS states:

“This strategy outlines our ambition for more community ownership, management, and control over green spaces in the city and we recognise that delivering better quality can only be achieved by working with communities and partners.”

Bristol Parks Forum would not support a change of ownership of public parks and green spaces land. We believe that they should be owned by the people of Bristol through Bristol City Council.

### **Quality**

There is no mention here of the education of the public about Parks & Green Spaces – e.g. the value of different types of management. Parks Services Managers have frequently told us that they get many more complaints that the grass is not being kept tidy and not being mowed enough. This is a prime example of “quality” meaning different things to different people, especially as there is a misconception that e.g. changes in mowing regimes are being done to save money.

There needs to be a recognition that the “quality” that might be sought by “communities” could well conflict with the principles and requirements of the Ecological Emergency, Managing for Nature, etc.

It would be helpful in addition to explaining the value of the different management regimes, and explanation of how, for example, purchasing new machines that can manage grassland for wildlife rather than frequent short mowing, is not a cost cutting exercise, as the management will be more complex and require a range of equipment and skills. There should be action to progress this.

The Strategy states "Our strategic aim is to prioritise raising the quality of parks in areas of higher deprivation and where satisfaction is currently low." then does not seem to give much priority to this in the 'commitments'/actions?

The key action identified later in the PGSS is to 'Design & trial our new approach to assessing the quality of our parks in partnership with community groups and park users’

If volunteers are to be expected to spend time on these there needs to be a clear path to action to address any quality issues raised, so that volunteers can see the benefit. Volunteers will not want to spend time doing this just to fill in a spreadsheet and produce reports that no one does anything about because they haven't got the resources. The only follow up action in the document is to have 'joint action and management plans' by 2039 this underlines our concerns about the lack of appropriate key actions, implementation plan and measuring success and outcomes, addressed elsewhere in this response.

### **Distance**

We support the distance standards in this Strategy. This is particularly important for new developments which are also more likely to have little or no gardens, and this distance should be from a public park or green space not private.

### **Quantity**

We note that many of the development sites in inner urban / central areas of Bristol already have development proposals which have little or no publicly accessible green space, nor is the land necessarily in City Council ownership or control or Parks Services management. Presumably these would not therefore be considered part of the PGSS if they are not publicly accessible at all times. Private owners would presumably want to close off any such sites occasionally to assert private ownership rather than public amenity. What action will you take to ensure new parks and green spaces are fully open to the public, if they are not in Council ownership? And this action should be described in the Strategy.

We note that delivering new green space is described as an “aspiration” but it must be more than an aspiration it must be written into those plans and policies, the Local Plan particularly, where it can be ensured it is delivered. Otherwise it is just fine words but little chance of actually materialising as a green open space, let alone one in public ownership of the City Council.

Our view is this Strategy cannot “encourage and guide the development of new spaces in regeneration areas – identified in the Local Plan” as it has been published too late for that. The Local Plan has been written and the final version is out to consultation and will be going to Examination. This Strategy needs to be adopted and inserted into the Local Plan before the Examination takes place.

## **Chapter 5 Priority Themes**

### **Nature & Climate**

There needs to be a clear explanation of what is meant by “a networked habitat for wildlife” especially if it is different from “nature corridors” used elsewhere in this document and the phrases “Nature Recovery Network”, “Ecological Corridors” and “wildlife corridors” used in the Local Plan. There needs to be clarity and conformity.

There is insufficient reference to the “blue infrastructure”. The rivers which run through our Parks and Open Spaces provide extremely important links between wildlife habitats through otherwise unconnected natural areas. We understand that a document regarding the Blue – Green Infrastructure is in development, and has been for a long time, but that should not preclude referencing the rivers, ponds and other important areas of water that are within the Parks and Green Spaces and connect them.

Bristol’s Managing for Nature Plan which you state shows “shows that 31.6% of land covered by this strategy is currently being managed for nature” is not available as reference document. This Strategy makes much reference to the Managing for Nature Plan, including quoting statistics from it, so it must already have been written. The text of this document should have been available alongside the PGSS for this consultation and especially as there is a map of the sites to be Managed for Nature in the consultation survey. The Managing for Nature Plan needs to be published as an annex to the PGSS.

### **Why is Nature and Climate a priority?**

The latest State of Nature Report was published in 2023 and we understand that the State of Nature Report referred to here is the State of Nature Report 2019 so this should be stated especially as the PGSS will have a long shelf life – at least 5 years until review. The statistics need to be clearly shown and referenced to the correct report so that success of the PGSS can also be measured against the pertinent State of Nature report.

We understand that the Tree Canopy Potential Map only refers to Tree Canopy Potential on Parks, Green Spaces and Allotments sites. This map should only show sites relevant to the PGSS, e.g. without allotments. We have been told that the Tree and Woodland Strategy, in preparation, will cover trees including street trees and other non Parks trees and this is where allotment sites belong – in the wider Council land.

The Tree Canopy Potential Map is, we have been told by Parks officers, is a map of areas covered by this PGSS where there is a lack of tree cover. This is not really made clear and when respondents look at their local sites they might, understandably, have the expectation (or concern) that they will be planted with trees. There needed to be much clearer statement that this map does not offer that level of detail but would be used as a first line of assessment, before specific site by site assessment if undertaken along with local consultations.

The PGSS implies that there will be a change in the way rivers are managed including changing the routes of them to make them more natural and wildlife friendly. There is no explanation of this, nothing in the commitments regarding rivers nor in the key actions. A strategy without action is just words, so actions on this point would be welcomed

The photograph in this section on P18 is of a bee on a buddleia flower. Buddleia is an invasive non-native plant which volunteers are actively removing from some of Bristol's nature reserves. Please replace this with a native wildflower and pollinator.

### **Our Commitments**

This commitment statement "We will ensure that our habitats are designed to thrive in changing climate conditions ..." has no key action to deliver it. This is just one example of the lack of linkage between commitments and key actions. Please ensure that the linkages are clear between commitments, key actions etc. since a strategy without action is just words.

The Key actions tables do not clearly show that the "by 2039" rows are actually referring to outcomes not actions. For example, under nature "The use of pesticides in Bristol's parks and green spaces will be reduced, as a result of actions taken by the park service, contributing to the councils target to reduce the use of pesticides by at least 50% by 2030."

Another outcome in the same section is not a PGSS outcome / success measure as it refers to trees across the whole city as would be covered by the Tree and Woodland Strategy not the PGSS.

### **Nature**

The strategy states: "We will deliver actions from our Managing for Nature Plan to support the city's ambition to ensure at least 30% of the city's land is managed for nature. We will work together with partners, communities, and parks groups to support the delivery of a further 771 hectares of new or enhanced natural habitat" . Without the Managing for Nature Plan Action Plan this is impossible to support or otherwise.

There is nothing to explain what is meant by "partners, communities and parks groups"? Clarification is needed as to what are "partners" in this context.

The Strategy states:

"We will establish at least 50 hectares of new trees and woodland within 10 years of the adoption of this strategy by identifying new sites for tree planting, continuing our successful grant funding programme and planting trees through our One Tree Per Child programme and other volunteering activities"

In regards to the statement above, it is not clear whether this acreage of new trees and woodland only refers to those planted in Parks and Green Spaces or whether it includes all trees proposed to be planted including those on allotments and in school grounds – though One Tree Per Child planting in school grounds would not fall within the PGSS any more than the allotments as most School grounds are not open to the general public.

This statement refers to new trees and woodland but there is nothing about how the loss of trees as a result of ash dieback or other tree losses factored into this Strategy. There is no reference to this. To replace all the trees lost to ash dieback many more trees will be needed. We believe that the effects of ash die back and other losses will be a significant change for parks and green spaces.



“We will pursue all forms of funding to support our nature recovery programme including new opportunities such as Biodiversity Net Gain” This statement needs clarification in terms of what is meant by “all forms of funding” and also what is the “nature recovery programme”.

Elsewhere in this Strategy you refer to net gain. This is confusing and is best not used but instead explain what you mean and how you will achieve more green space.

Biodiversity Net Gain is a very specific term and can only be applied in very specific circumstances. If you are going to use this term in the PGSS a proper explanation of what “Biodiversity Net Gain” means and how it is a Planning term and what it could and could not be used fund in terms of Parks provision and management, and a hyperlink / URL would be helpful.

The Bristol Blue Green Infrastructure Strategy needs to be referenced in the text. There is nothing about the rivers that are integral to the wildlife conservation across the city and within the Parks & Green Spaces? However the references section does include “Bristol Blue Green Infrastructure Strategy (In development)”.

Having referenced the Blue Green Infrastructure without mentioning it in the text there is no reference to the Tree & Woodland Strategy which we understand is also in development and due for publication relatively soon. This needs to be added to the list of references.

## **Climate**

The PGSS says

“We will also explore how we can ensure there are accessible, comfortable and shaded places of respite and cool corridors for movement in parks,”

Surely the cool corridors should be movement between places using the green and blue infrastructure as shady corridors for the public and wildlife to travel.

Presumably the wording should have been:

“We will also explore how we can ensure there are accessible, comfortable and shaded places of respite in parks and cool corridors for movement between areas of the city,”

Reference is made to both “nature corridors” and “networked habitat for wildlife” without any explanation of what these mean and what differentiates them. This requires clarification. There is also nothing written in the strategy to indicate the correlation between these and “wildlife corridors” and other related terms referenced in the Local Plan and shown on the BCC GIS map.

## **Priority theme: Children and Young People**

Which partners do you envisage providing activities and educational sessions? Looking at the Forest School example, who would pay for these? How will these be provided equitably? Do you mean “partners” or private providers who are charged for site permissions etc?

In the final paragraph it states “we will work with local councillors and communities to commit resource to improving play facilities ...” Are parks groups included in the “communities” here as elsewhere in this strategy parks groups are explicitly referenced separately from communities.

The One Tree Per Child case study is primarily about tree planting on school grounds which do not fall into the publicly accessible land that is the criteria for the PGSS. A better case study would be one where children have planted trees in one of the public green spaces covered by the strategy.

### **Community Participation**

Please add a sentence to explain what the Many Neighbourhoods One City work is and a hyperlink in the references.

### **Our Commitments**

“Developing opportunities to engage a more diverse range of decision makers will be key to our service delivery in the future.”

We do not understand this sentence as there is no explanation or examples of what decision makers this refers to. Please add this.

We strongly support the on-going work with Your Park but note that there is nothing to reflect other potential partners of a similar ilk during the lifetime of the strategy.

“We will seek to design and deliver ways to devolve responsibility for the management of spaces to communities.”

There is no clear explanation of the sort of responsibility you envisage devolving to communities and how will this relate to the on-going landowner responsibilities and accountability of the City Council.

### **The case for change :**

#### **Carolina House and Dove Street, Kingsdown.**

The use of this case study seems to be inappropriate. As far as we can tell from the text the food growing project in this public park was undertaken by some local residents without prior permission from the City Council.

This is presumably the reason why this is described as “guerrilla gardening”. If this is not the case then it would not be colloquially described as “guerrilla gardening” in any case as that usually refers to unauthorised planting.

We think this case study should either be removed from the Strategy, or presented differently; otherwise there is the potential to use it as an example of what people can do in a Bristol Park, and could potentially lead to people starting any kind of unauthorised use of Parks’ land.

If there is a problem as we described above, is there a different example of community participation in line with this heading that can be used with a similar context?

### **Health and Wellbeing**

Whilst allotments may well contribute to Bristol citizens’ health and wellbeing formal tenanted allotments do not belong in this strategy because they are not open to the public and do not meet the criteria of publicly accessible land, rather they are the exact opposite. The fact that these allotments fall under the auspices of the Parks Service does not mean they fall within the Parks and Green Spaces Strategy and therefore should not be referenced here. The One City Goals referenced do not relate to formal allotments other than very tenuously in terms of health but not everything that meets that third goal has a place in the PGSS.

We suggest that any aspirations relating to food growing in parks and green spaces could be added into this section, with an explanation of how this might be managed in terms of open access and potential conflicts.

### **Commitments**

The commitment relating to tenanted formal allotments is not related to publicly accessible Parks and Green Space so does not belong in this PGSS. Please remove it.

The commitment relating to playing pitches refers to the “current provision” of playing pitches whereas the playing pitch strategy 20017-22 included sites that were no longer in playing pitch use but were being listed for retention for playing pitch use at some point in the future were money to bring them up to an appropriate standard to be found. This suggests that the sites which are not currently being managed for playing pitch use will be removed from the forthcoming playing pitch strategy and managed as recreational land – e.g. informal park

### **The case for change :**

#### **‘Wild and Well’ - Opening parks for health**

Opening parks for health is an unhelpful phrase in the title as it implies very strongly that they are not open for health at the moment and neither offer nor fulfil that function which is not true.

There is no link or explanation about the Wild & Well Programme and Your Park.

Other health programmes such as Walk for Health, ParkRuns etc. continue in Bristol’s Parks and do not rely upon funding nor paid input.

A broader set of examples here that covers the whole city not just the areas where the Wild & Well Programme is focused would be good. The value of parks and green spaces for people’s health and wellbeing is not solely tied into activities and projects that are staffed, funded and have active engagement. The value of just being able to walk, run, play, volunteer, etc. in Bristol’s Parks and the benefits to people’s health and wellbeing should be flagged up. These programmes otherwise do not feel inclusive across the whole city, whereas access to good parks is a key priority for the whole city. The Project undertakes specific actions and is not about health for all so much as health improvements for some – e.g. through supporting green social prescribing work in the city.

We would support the recognition that simply having accessible quality parks that are free at the point of access is crucial.

### **Culture**

#### **Our commitments**

What is the “Our Spirit of Place” approach? There needs to be an explanation and reference link to this approach.

There is always concern about the use of public parks for events that restrict access, may damage or otherwise impact on the public enjoyment of that site. Whilst we support events programme being “guided by more ecologically conscious practises” this needs to be more explicit about referencing ecology in terms of impacts on habitats, wildlife, park facilities etc. Ecological conscious practises – needs to be clearer. What would it actually mean and how would it be implemented?

“The council has an obligation to ensure that listed buildings, scheduled monuments and registered parks and gardens are maintained and preserved for future generations. We need to be realistic about our ability to maintain heritage going forward and design solutions accordingly. We will need

to prioritise what and where we invest based on not only highest need but also what will deliver the most benefit to residents of Bristol.”

The word “statutory” is missing from this first sentence. Many of the listed buildings, scheduled monuments, etc. in our parks and green spaces will have legal requirements that do not rely upon “realism” as defined by Bristol City Council or its Parks Department and this should be explicitly stated here as there is the implication that they could just be maintained in a way that suits the City Council for expediency rather than legal requirements.

### **Our Commitments**

“We will secure external funding and co-design plans with stakeholders and communities to enhance the benefits of existing historic and cultural sites such as St Peter’s Church and Ashton Court Mansion.”

Many people will not know where St Peter’s Church is so we suggest adding “in Castle Park” after St Peter’s Church.

### **Priority theme: Employment and Skills**

We welcome the upskilling of staff and the explicit skills needed, which should be stated, are those which will deliver the Vision and Commitments within the PGSS. These skills include public outreach and engagements, ecological knowledge and understanding of land management to benefit wildlife.

We welcome the upskilling of communities as well.

### **Why is Employment and Skills a priority theme?**

“Delivering our strategic vision for parks and green spaces will require a collaborative approach which enables partners and communities to take more ownership of their spaces. The Parks Services plays a strategic role in providing skills to these individuals and groups.”

The use of the term “ownership” here can be confusing given that elsewhere in the strategy ownership is used in the sense of giving legal control to another body. This paragraph would be better written to describe this approach that “enables partners and communities to be more engaged and to take greater responsibility for their spaces”, so as to remove the confusion and be more explicit.

### **Our Commitments**

The commitments on page 37 relate more to the Health & Wellbeing section than to the Employment and Skills section. The first three commitments belong in the Health & Wellbeing section and the fourth in the allotment strategy which should not be in the (public) Parks & Green Spaces Strategy.

These commitments do not refer to employment and skills and there needs to be commitments written and added relating to employment and skills of staff and upskilling of partners and community members appropriate to the uses envisaged in their park or green space.

### **The Case for Change – ParkWork**

We welcome the inclusion of this case study.

However, the photo beneath it would be better replaced with a picture of ParkWork participants rather than what seems to be a photo of an unrelated café.

## **Chapter 6: The Food Growing and Allotments Strategy 2024 - 2039**

As already stated we welcome food growing as one of the uses of Parks and Green Spaces but strongly oppose the inclusion of the Allotments in the PGSS.

The PGSS is not a Parks Service Strategy but a strategy explicitly about Bristol's Parks and Green Spaces which are fully open and accessible to the people of Bristol.

A separate Priority Theme of Food Growing could be added to the PGSS which would cross reference the separate but related Food Growing and Allotments Strategy in exactly the same way that this PGSS references the Tree & Woodland Strategy which we are told by Parks Management is not in this document because it relates to all trees and woodland in Bristol not just those in the city's parks and green spaces. Alternatively Food Growing could be a section in the Health & Wellbeing Priority Theme

The Allotment Strategy needs to be aligned to Allotment Rules, Guidance, Tenancy Agreement and Allotment Transitional Arrangements. Currently these are misaligned and we cannot support the Allotment Strategy because it has to be in conformity with the PGSS and the rules and regulations that follow on from the Strategies. The Allotment rules are clearly contrary to the PGSS in terms of managing for nature aspirations and commitments, tree canopy, equalities and the collaborative and community focused approach highlighted across the PGSS.

We support food production in a variety of ways across the Parks and Green Spaces of Bristol, where it is appropriate and provided that this then also maintains full public access to the Park or Green Space.

As this Chapter has been included in this consultation, whilst opposing its inclusion as it stands, the Forum will nevertheless comment on the content.

The vision for this "strategy" states

"Our vision: The city will provide a thriving network of accessible spaces for local people, communities and social enterprises to grow healthy and sustainable food. This network will tackle food inequity, strengthen food resilience and support community cohesion and wellbeing."

This serves to underline the fact that allotments do not belong here as allotments are not accessible spaces in the way that parks and green spaces are accessible. They are behind locked gates, require to be rented and involve strict tenancy agreements and stringent rules. These are being consulted upon concurrently with the PGSS but do not reflect the principles nor general commitments, particularly to nature and climate.

The non conformity between the principles of the PGSS and the proposed allotment rules, tenancy agreements etc. alone preclude the allotment strategy from belonging within the PGSS. The Food Growing and Allotments Strategy has been described as being "embedded" within the PGSS but it simply is not.

Examples of this include: Tenants are expressly prohibited from using their cultivation area for grass land, wildflowers, wildlife areas, ponds, ornamental shrubs, bushes, hedges, non-fruit trees.

The Allotments Transitional Arrangements documents also states:

"Trees – all trees to be removed from plots except the permitted dwarf root stock fruit trees." This has to take place within 3 years. Whilst there is a statement that "Mature trees may be permitted subject to Tree Officer advice and Conservation areas constraints" this is a caveat and would appear to be exceptional from the tone of the document and the description of the periods to affect change be labelled "grace periods".

As Allotments are not Parks or Green Spaces there may well be different statutory requirements for their management under the Allotments Act 1950. There is not statutory powers relating to local authority owned and managed Parks & Green Spaces which is another reason why the Strategy and its Rules, Tenancy Agreements, etc. do not belong in the PGSS.

This Chapter also references other documents and agreements such as the Milan Urban Food Policy Pact and the Glasgow Food and Climate Declaration. There is no reference section nor any links to these documents nor is there a strategies box that provide links to strategies in the other chapters and sections.

In order to properly address the consideration of the public parks and open spaces for food growing, the allotment references need to be removed as they form the majority of food growing land and opportunities in the city but are privately rented and behind locked gates and secure fencing.

There is much in this section about commitments relating to the tenancy agreements, fees, Council management of allotments and improving accessibility, e.g. for disabled people and those with additional needs. None of this is about food growing in Parks and Green Spaces and has no direct relation nor correlation with publicly open parks and green spaces.

The table shows the land in scope for the Food Growing and Allotments strategy and none of it as far as we can see is within public parks and green spaces. There is currently nothing about food growing potential actually within parks and green spaces and this should be included in the PGSS but allotments should not.

**The Alive Case Study** is about an allotments project, not a growing scheme in a park and does not belong in this PGSS.

**The Blaise Nursery: Communities Growing Project** ironically is about community growing not on allotments yet none of the 60 projects referenced is explicitly mentioned as taking place in a park or green space.

There are community growing projects in public parks yet these are not even mentioned at all, but could provide useful examples.

This “Strategy” Chapter needs to be removed and replaced with one that is about growing in public parks if this is something that the Council is willing and able to facilitate. Our members whilst welcoming this additional use of public parks and green spaces have expressed their concerns that this will add yet another usage to the long list of uses that parks and green spaces are expected to accommodate and they worry how these will be managed without removing public access – e.g. without fencing parts of parks off to bar access to the general public.

The lack of inclusion in the Strategy of the Food Growing information and map that is in the PGSS Consultation Survey is unhelpful. Some of the areas of greatest deprivation and food insecurity have the least area of allotment land and therefore how other public green spaces would be repurposed for food growing in those areas is important as allotments in those areas will not play much part in addressing this.

## Chapter 7: Implementing Our Strategic Vision – Key Actions

Bristol Parks Forum is concerned that the PGSS lacks sufficient information to achieve implementation and deliverability.

Chapter 7 of the consultation document "Implementing Our Strategic Vision - Key Actions" sets out actions for the six priority themes from Chapter 5. There are also actions for Food Growing and Allotments (Chapter 6) and for Financial Sustainability, which is one of the 'Strategic Principles' described in Chapter 2. There are no actions for the other Strategic Principles, so how will they be realised?

Actions are classified as short, medium or long-term or as "by 2039". It appears that the intention has been to select a few actions under each heading, keeping to a maximum of one page for each.

The 'actions' shown as "by 2039" are actually targets rather than 'actions' and some of these are repeats of targets from the One City Plan already included in Chapter 5. Those that are new targets should be included as additional targets within Chapter 5.

The remaining actions are used as the major part of the consultation survey under each theme, though the survey does not indicate whether they are short, medium or long-term. For the consultation, as examples of the types of actions the Parks Service proposes, this will probably produce some useful feedback but there is no indication how this will be used.

We do not believe these key actions should be included in the final strategy document. Chapter 7 should be removed. Instead, a separate "Implementation Plan" needs to be developed.

The adopted Strategy Document will be valid for at least 5 years, perhaps longer, and chapter 7 may appear to be out of date before that time. The Implementation Plan would be a more dynamic document, reviewed annually as funding opportunities arise or other circumstances change. Key stakeholders, such as Bristol Parks Forum and Your Park, should also be involved in the development of the plan.

The current actions do not have a workflow through them and some actions are implied but not stated. For example under Health and Wellbeing the short-term action states that a response plan will be developed, but there are no follow up actions to implement that plan.

A separate implementation document would allow for actions to be included to show the flow from development to action on the ground in parks, with projected timescales. It should also make clear how the proposed actions relate to the specific "Strategic Principles" and "Commitments" in the adopted Strategy, again this is not done in the current document. Some "Commitments" do not appear to have corresponding actions but could in fact be read as actions themselves; where this is the case they need to be included in the Implementation Plan so that they do not just become 'nice words' that don't lead anywhere.

The separate implementation plan would also ensure that the other plans and strategies that are yet to be finalised and / or published such as the Managing for Nature Plan and the Green and Blue Infrastructure Plan which are key to the implementation of much of the PGSS, will be available and be able to be used and referenced in the Implementation Plan.

In addition, the Financial actions (p48/49) do not fit with the overall structure of the document. For consistency, if these are to be included, there should be actions for the other "Strategic Principles".

Most of the financial key actions would be better included under the relevant themes, those that don't fit (the third & fourth bullet points under short-term) are ongoing business as usual rather than new actions and are adequately covered in the general statement in chapter 2.

We trust that our response will contribute positively to the final version of the Bristol Parks and Green Spaces Strategy and look forward to working with the City Council in assisting with its delivery.