

Bristol Parks Forum
 Summary of submitted representations on Bristol City Council Local Plan
 25 January 2024

Text in blue is where we are supporting the Council's position.

BPF Rep	Location in Plan	Why not sound	Reasons for Modification/ Support	Modifications
1	Vision for Bristol 2040	NP	The Vision Text is not in compliance with the National Planning Policy Framework Para 7	As it updates the statutory development plan for the city, the new local plan aims to establish a planning approach which contributes to the achievement of sustainable development in a sustainable manner.
2	Vision for Bristol 2040 – 15 minute city	PP	Central Government announced that it no longer supports the concept of 15 minute cities.	Replace the goal of a 15 minute city, with a 10 minute one based on One City Plan. Having a goal based on infrastructure/facilities with an indicative time can focus attention on accessibility related issues.
3	Central Bristol DS1 Bristol City Centre Policy Text	PP	The current plan does not enable sufficient parks and green spaces for central Bristol, to deliver sustainable development in that area, while also contributing to tackling the housing, climate and ecological emergencies. The modification improves the current wording while also allowing flexibility in the functions of the new park.	New and enhanced public realm and green infrastructure including a large multifunctional green park
4	Policy DS3 St Phillips Marsh	PP	The current plan does not enable sufficient parks and green spaces for central Bristol, to deliver sustainable	The retention, enhancement and creation of new space including a new large multifunctional park which is publicly

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			<p>development in that area, while also contributing to tackling the housing, climate and ecological emergencies. The modification improves the current wording while also allowing flexibility in the functions of the new park. See also other related representations. This version, at this scale of policy, provides a direction which would maximise the ability of the new park to deliver the benefits to people and wildlife. While we welcome improvements to existing parks and green spaces; and the provision of new open space including pocket parks and within development green infrastructure, only a new park at a sufficiently large size will provide the benefits needed to deliver adequate public green space to meet the needs brought about by the amount of change proposed for central Bristol. There is a real risk that open space will be "hard surfaced" and "isolated" without this wording. Existing parks either within or nearby to St Phillips are too small or</p>	<p>accessible and publicly owned, to serve the new developments. Other new and enhanced open space should be.....</p>
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			<p>have insufficient room to provide the space needed for the residents of somewhere between 2,500 and 7,500 new homes. St Philips is the only area left in Central Bristol, with the potential to provide this feature. Most areas in central Bristol already have planning applications or framework proposals in position or nearing finalisation.</p>	
5	Policy DS3 St Philips Place Principles	PP	<p>The current plan does not enable sufficient parks and green spaces for central Bristol, to deliver sustainable development in that area, while also contributing to tackling the housing, climate and ecological emergency. The modification improves the current wording while, also allowing flexibility in the functions of the new park. See also other related representations. This version at this scale of policy provides a direction which would maximise the ability of the new park to deliver the benefits to people and wildlife. While we welcome improvements to existing parks and green spaces; and the provision of new open space</p>	<p>Development will ensure the provision of appropriate green infrastructure and open space, including a new large multifunctional green park which is publicly accessible and publicly owned. Sparke Evans Park will be enhanced to serve the wider and provide space for recreation.</p>

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			including pocket parks and within development green infrastructure, only a new park at a sufficiently large size will provide the benefits needed to deliver adequate public space to meet the needs brought about by the amount of change proposed for central Bristol. There is a real risk that open space will be "hard surfaced" and "isolated" without this wording. Existing parks either within or nearby to St Phillips are too small or have insufficient room to provide the space needed for the residents of somewhere between 2,500 and 7,500 new homes. St Phillips is the only area left in central Bristol, with the potential to provide this feature, as most areas in central Bristol already have planning applications or framework proposals in position or nearing finalisation.	
6	Policy DS4 Western Harbour	NP	Currently the text while including wildlife corridors does not include stepping stones in line with National Planning Policy Framework. Inclusion of this text enables better	The retention and provision of wildlife corridors and stepping stones.

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			compliance with policy, and also a more positive contribution to the climate and ecological emergencies.	
7	Policy DS6 Lawrence Hill	NP	Currently the text while including wildlife corridors does not include stepping stones in line with National Planning Policy Framework. Inclusion of this text enables better compliance with policy and also a more positive contribution to solutions related to the climate and ecological emergencies.	The retention and provision of wildlife corridors and stepping stones.
8	Policy DS7 Central Fishponds	NP	Currently the text while including wildlife corridors does not include stepping stones in line with National Planning Policy Framework. Inclusion of this text enables better compliance with policy and also a more positive contribution to solutions related to the climate and ecological emergencies.	The retention and provision of wildlife corridors and stepping stones.
9	Policy DS9 Brislington	NP	Currently the text while including wildlife corridors does not include stepping stones in line with National Planning Policy Framework. Inclusion of this text enables better	The retention and provision of wildlife corridors and stepping stones.

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			compliance with policy and also a more positive contribution to solutions related to the climate and ecological emergencies.	
10	Policy IDC1 Development contributions and CIL	PP	The description of the new and improved infrastructure contains a range of possibilities, the comprehensiveness of one of those entries needs to be improved to cover green spaces. This in turn helps provide a more positive response to the climate and ecological emergencies.	Future developments in Bristol will be supported by new and improved infrastructure such as schools, parks and green spaces, transport facilities..."
11	Delivering Bristol's Homes	NP	The text – "Green field sites are rare in Bristol, and most are required to be retained as Green Belt Land, for recreation and to sustain and enhance biodiversity and food growing" implies that Green Belt is retained for these reasons.	Green field sites are rare in Bristol and most are required to be retained as Green Belt land, to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns merging into one another; to assist in safeguarding the countryside from encroachment; as well as provide opportunities for recreation, and to sustain and enhance biodiversity and food growing.
12	H5 Self build and community housing	PP	The inclusion of Reserved Open Space as part of the description of sites where this type of development will be permitted could be	Remove point 4

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			interpreted to direct this type of housing to these sites, rather than allow applications to be made as for other types of housing to relevant sites.	
13	H8 Older People's housing	SUP	The inclusion of this point highlighting the need to have open space alongside the presence of other infrastructure/facilities, shows that the Plan is in this instance positively prepared.	
14	Biodiversity and Green Infrastructure	PP	The current paragraph does not define what biodiversity is, which means that users will need to work through the whole of this section to understand the whole situation which involved in the biodiversity and GI policies. Defining biodiversity at the start of the chapter improves the understanding of the policies that follow.	Include a new paragraph defining biodiversity as "Biodiversity describes the variety of habitats and species in an area."
15	Biodiversity and Green Infrastructure	PP	The description of point 2, does not fully cover the range of actions needed to ensure the future of an extensive network of open space; and their positive contribution to tackling the climate and ecological crises.	Identifying, protecting and enhancing an extensive network.

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16	BG1 Biodiversity in new developments	PP	Current wording of these two points needs to be strengthened to enable a more positive contribution by new development to sustainable development and solutions to the climate and ecological crises.	1) Development proposals will be required to incorporate... 2) The provision of green infrastructure in development will be required to:
17	BG1 Biodiversity in new developments	PP	The text needs to be strengthened to enable a better understanding of ecological networks, and therefore increase the possibility that development will be able to respond positively in line with the National Planning Policy Framework; and contribute to solutions to the Climate and Ecological crises.integrity of the Nature Recovery Network and wider ecological networks, including corridors and stepping stones.
18	BG2 Nature Conservation and Recovery	PP	Current wording needs to provide a more positive contribution by new development to sustainable development and solutions to the climate and ecological crises.	Para 1 – Development in Bristol will be required to. Para 2 - ...Which contribute to nature conservation and recovery in Bristol, including on previously developed land will be required to;” Para 3 “Where the loss of nature conservation value is unavoidable to enable development which is in accordance with the local plan, proposals will be required to provide mitigation on site.....”
19	BG2 Nature Conservation and Recovery	PP	The inclusion of the text “will not be permitted” shows that in this instance the plan is positively prepared and would help with	

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			solutions to the Climate and Ecological Crises.	
20	BG2 Nature Conservation and Recovery	PP/NP	The proposed text needs to be expanded to cover more of the process involved in reaching the decision as to whether mitigation is acceptable or not.	Development which would fail to take the opportunities available to enhance ecological networks or result in significant harm to biodiversity which cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or as a last result, compensated for, will not be permitted.
21	BG2 Nature Conservation and Recovery	PP	The description of the stage when there should be consideration of significant harm in relation to mitigation needs more clarity to help those using the text to guide designs, decisions and actions. Is it before or after mitigation?	Development which would have a significantly harmful impact before/after mitigation on local wildlife.
22	BG2 Nature Conservation and Recovery Irreplaceable habitats	SUPP	The commitment here in this instance shows that the Plan has been positively prepared; and that the policy could contribute to tackling the Climate and Ecological Crises.	
23	BG3 Achieving Net Gain	PP	Current wording of this point needs to be strengthened to enable a more positive contribution by new development to sustainable	...new development will be required to incorporate provision for biodiversity

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			development and solutions to the climate and ecological crises.	
24	BG3 Achieving Net Gain	PP	Higher targets for Biodiversity Net Gain need to be applied to areas next to existing designated nature conservation sites (SAC, SSSI and SNCI) to help extend the network of ecological corridors and the Nature Recovery Network	Developments adjacent to open spaces designated as SACs, SPAs, Ramsar sites, SSSIs or SNClS will be required to secure a minimum of 15% biodiversity net gain.
25	BG3 Achieving Net Gain	PP	Higher targets for Biodiversity Net Gain need to be applied to areas next to existing designated open space (eg: Local Green Space and Reserved Open Green Space) to help extend the network of ecological corridors and the Nature Recovery Network	Developments adjacent to open spaces designated as Local Green Space or Reserved Open Green Space will be required to secure a minimum of 15% biodiversity net gain.
26	BG5 Biodiversity and Waterways	PP	The current wording needs to be strengthened so that a positive contribution by new development to sustainable development and solutions to the climate and ecological crises be delivered.	Proposals which are adjacent to, or contain waterways will be required to:
27	BG7 St Pauls Link	SUP	The inclusion of this policy in this instance provides evidence that the plan has been positively prepared.	

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28	GIA Open Space for Recreation	PP	The current text while maintaining the overall proportion does not seek enhancement of that proportion. The addition of enhancement as an issue will reinforce the delivery of sustainable development and the benefits that development can bring to people and wildlife through open space provision.	That the overall proportion will be maintained and enhanced through the proposals in the Local Plan.
29	GIA Open Space for Recreation	PP	Additional sentence or an addition to the existing sentence provides a better link to multifunctional open space having benefits for wildlife, meaning that open space can be seen as contributing to solutions to deal with the ecological crisis.	Open space for recreation can also provide benefits for wildlife.
30	GIA Open Space for Recreation	PP	There is a need to clarify what is meant by the Council's strategies and which guidelines in those documents are involved. The modification below assumes that there is only one Council Strategy. If this is not the case the modification can be changed.	Is available to serve the new development in accordance with the guidelines for those characteristics set in the Council's Parks and Green Spaces Strategy 2024.
31	GIA Open space for recreation	PP	Current wording of these two points does not enable the most positive contribution by new development to sustainable development and	1 Development will be required to ensure that sufficient quantity, quality and proximity of open space for recreation. 2 Where new

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			solutions to the climate and ecological crises	open space for recreation is created as part of a development, it will be required to:
32	GIA Open space for recreation	SUP	The inclusion of the requirement for there to be a suitable long-term, maintenance programme on new open space for recreation is in this instance showing that the plan is positively prepared.	
33	GI1 Local Green Space	PP	The current text does not include consideration of the Local Green Space's existing functions. Existing functions need to be considered alongside the other elements. Functions can be across the whole site, or only in specific parts. See also Para 2 of the policy.Harm to the Local Green Space's characteristics, existing functions, appearance or role will not be permitted.
34	GI3 Incidental Open Space	PP	The policy text (or alternatively the explanation) should enable local communities to have a say on areas which are likely to be disposed of before decisions on that disposal are made.	Will not be permitted where the space is locally important for recreation, leisure use or townscape and visual amenity; or where the local community has not been consulted before the initial decision to dispose of the land has been made.
35	GI4 Stapleton Allotments and holdings	SUP	The inclusion of this policy in this instance shows that the Plan is positively prepared due to the importance of this space as allotments and food production	

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			areas, and as part of an ecological network.	
36	Policy T6 Active Travel Routes	PP	The explanatory text needs to be changed to allow a more effective way of identifying issues and seeking solutions in advance of a planning application by considering the existing functions of an area, or part of an area across which new infrastructure is going to be placed. This is view is based on experience with the design and preparation of Quietways/Greenways in South Bristol.	They should also report on the identification and consideration of the existing functions of the area, or part of an area across which the new infrastructure is intended to go, and describe solutions to how those functions can be maintained or improved in the area.
37	Policy CF2 Retention of community facilities	PP	The role of communities in providing appropriate replacement facilities needs to be strengthened by the inclusion of text to enable co-design	The Council will consider the need for appropriate replacement facilities in lline with the needs of the community, and co-design those facilities with them.
38	NZC 4 Adaption to a changing climate	PP	The policy text needs to be strengthened to provide more detail on the benefits of what multifunctional blue and green infrastructure can do.	Demonstration of how multifunctional blue and green infrastructure has been used to provide both climate adaption (eg: shade to indoor and outdoor spaces, reduction of surface water run off rates, reduction of the urban heat island effect), health and well-being and biodiversity benefits.
39	DMP1 Delivering well-designed inclusive places	PP	As Design and Access Statements are the part of a planning application, which allows the best	Design and Access Statement will set out how the design of new development....

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			way to start to understand the application, the commitment to make the statement cover the issues stated needs to be stronger.	
40	DC2 Tall Buildings	PP	The definition of the extent of harmful impact needs to state that the statements apply to local surroundings. Eg: Point i) does not have an extent attached to it.	Tall buildings should not have a harmful impact on features in the locality of the development by reason of:
41	CHE Conversing Historic Heritage	PP	The paragraphs listed need to be strengthened to better ensure that our heritage and historic environment is preserved, conserved and where possible enhanced. The changes to "will" or "will be required" etc relate to the CHE policy, but across multiple subject areas and paragraphs.	Page 194 Para 13.2.23 "This policy will ensure that this legacy is"; Policy Text General Principles – "Impact upon a heritage asset will be required to conserve"; Policy Text Archaeology – "Archaeological sites of equivalent importance will be required to be preserved in situ". Page 195 Policy Text Listed Buildings – "Listed buildings or development will be required to have no adverse impact"; Policy Text Conservation areas – "Setting of a conservation area will be required to be preserved, or where appropriate"; Policy Text Registered Historic Parks and Gardens – "Development will be required to have no adverse impact"; Policy Text Locally Important Heritage Assets – "Proposals affecting locally important heritage assets will be required to ensure they"; Policy Text

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				Understanding the asset – “Development proposals that would affect the significance of a heritage asset will be required to ensure they are conserved; Policy Text Conserving Heritage Assets – “including a locally listed heritage asset, or its wider historic setting, the applicant will be required to”.
42	CHE Conservation of the Historic Environment Energy Efficiency	PP	The current wording is not clear enough on what is a listed building and conservation area in terms of their setting. Additional words would help with clarity.	The proposals would not adversely affect the character, appearance and setting of the heritage asset.
43	HW1 Pollution Control	PP	The current wording needs to be changed to ensure a better understanding of what is covered by this policy.Unacceptable impact on human health, green/blue infrastructure, environmental amenity, biodiversity.
44	UM1 Telecommunications	PP	The current wording does not allow consideration of the existing functions of the sites involved, which has with some applications led to conflict between the proposals and public use.	The telecommunications equipment and installation would respect the character, functions and appearance of the area.
45	Policy Plans Development Strategy Areas	PP	The treatment of parks and green spaces in the Development Strategy areas in the Maps is inconsistent, and does not treat the areas, and therefore those with an interest in	All DS areas are given the DS hatching, and then the parks and green spaces are coloured as ROGS (light green) unless there are already agreed designations (see Lockleaze).

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			those areas, equally. See the difference between Lockleaze and Western Harbour for instance. No areas should be totally coloured in (orange) or not have an indication of the areas of parks and green space. It is recommended that an "open trellis" approach is used. This means that the DS hatching remains, but below the hatching all parks and green spaces are designated as ROGS, unless there are designations already agreed.	
46	Policy Plans Ecological Networks	PP	The Plans do not show details of the wildlife corridors (Development Allocations) or Other Ecological Networks (Main Document). While recognising that the Nature Recovery Network for Bristol is in development, the other two types of network should be shown. This will then aid those involved in the planning system to understand where these networks are, and how they could be maintained and enhanced.	The Plans should show the locations of the wildlife corridors and Other Ecological Networks. Or at least state where that information can be found.

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47	Policy Plans presentation of SNCI	PP	The application of the designation of Local Green Space to individual areas of land needs to be updated to cover all areas of Sites of Nature Conservation Interest. This would be in line with National Planning Policy Framework guidance on the designation of LGS for areas which are demonstrably special to a local community and holds a local significance because of its richness of its wildlife. The designation of Sites of Nature Conservation Interest should be sufficient to at least meet the second part of the criteria.	All Sites of Nature Conservation Interest to be coloured dark green as Local Green Space
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The meeting of the Committee on the 24th January agreed that we should ask to attend the Examination to explain/provide evidence on the new large park in St Phillips

Full copies of the individual representations are available from info@bristolparksforum.org.uk .

Prepared by Len Wyatt