



21 January 2024

Our response to the proposed new Parks and Green Spaces Strategy

The proposed Parks and Green Spaces Strategy¹ (PGSS) sets no SMART goals - goals which are Specific, Measurable, Achievable, Relevant and Time-bound. It is better characterised as a 'vision' than a strategy. A strategy is defined by the OUP as '*a plan of action designed to achieve a long-term or overall aim*'. This proposal is, instead, similar to the One City Plan, which sets aspirations but provides no road map for how they will be achieved.²

Our response to it is as follows:

1. The proposed strategy is only advisory.

- 1.1. The draft version of the Parks and Green Spaces Strategy³ (PGSS) is not a statutory document, nor has it been integrated into the proposed new Local Plan⁴ (the Plan), which makes no reference to it.
- 1.2. It is doubtful whether any strategy or plan, unless expressly adopted into Local Plan policies, carries any obligation of compliance. Indeed, the Council admits this, saying that, where it adopts a strategy or plan using its discretionary powers (as opposed to its statutory duties), '*that decision doesn't bind future administrations and ...could be called into question at such time as a new administration is elected.*'⁵
- 1.3. This suggests that the PGSS, adopted using discretionary powers, is vulnerable to alteration or abandonment, and so cannot be relied on to guide future decisions about either the strategy itself or the sites it purports to protect.

2. Many of the sites proposed will have little or no protection against future disposal or development.

- 2.1. The draft PGSS identifies 416 proposed sites. Of these, 59 are in the three Neighbourhood Development Areas (NDA) with current development plans and are expressly excluded from the Plan.⁶ Of these 59 sites in the three NDAs, only 12 were designated Local Green Space (LGS) under the criteria set out in the NPPF⁷ when their development plans were adopted between March 2016 and March 2019.⁸ There are no Reserved Open Green Space (ROGS) sites; this is a later designation peculiar to Bristol and first proposed in the March

¹ <https://www.ask.bristol.gov.uk/parks-and-green-spaces-strategy>

² <https://www.bristolonecity.com/about-the-one-city-plan/>

³ <https://www.ask.bristol.gov.uk/parks-and-green-spaces-strategy>

⁴ <https://www.bristol.gov.uk/residents/planning-and-building-regulations/planning-policy-and-guidance/local-plan/local-plan-review>

⁵

https://www.whatdotheyknow.com/request/1050495/response/2500473/attach/2/Response%20all%20information%20to%20be%20supplied.pdf?cookie_passthrough=1 The LPA's response to this

Fol: https://www.whatdotheyknow.com/request/incentive_scheme_to_be_used_when.

⁶ Old Market Quarter, Hengrove and Whitchurch Park and Lawrence Weston.

⁷ Paragraphs 101 - 103.

⁸ <https://www.bristol.gov.uk/residents/planning-and-building-regulations/planning-policy-and-guidance/neighbourhood-planning>



21 January 2024

2019 Local Plan review consultation.⁹

- 2.2. In the Plan, 347 of the 416 sites identified in the draft PGSS are designated either LGS (GI1) or ROGS (GI2) or a mixture of both. This leaves 69 sites with no LGS or ROGS designation, which makes them vulnerable to future development.¹⁰
- 2.3. Whilst LGS sites are said to have the same status as Green Belt land (NPPF 103 - though not subject to the same statutory protections), the Plan makes it clear that ROGS sites may be disposed of if it can be shown that '*the site is no longer required for its open space function*' and that '*a deficiency of open space would not be created through its loss*' when '*measured against the local plan's policies for open space provision (Policy GI A 'Open space for recreation').*'
- 2.4. But Plan Policy GI A only states that: 'Development will be expected to ensure that a sufficient quantity, quality and proximity of open space for recreation is available to serve the new development in accordance with the guidelines set out in the council's strategies.'
- 2.5. However, these 'strategies' are not mentioned in the Plan, so it is impossible to say what criteria would be applied when deciding whether a site is 'no longer required for its open space function' or that 'a deficiency of open space would not be created through its loss.' This makes these ROGS sites (and the 69 sites with no protection whatsoever under the Plan) vulnerable to being disposed of, using the mechanism set out in section 123 (2A) of the Local Government Act 1972 where they are publicly owned.¹¹ This thereby subverts their statutory trust for public recreational purposes, which would otherwise protect these sites.¹²
- 2.6. This is what happened soon after the 2008 PGSS was adopted, when, In 2010, barely two years later, the Council initiated a process to identify and sell off for development a number of 'surplus' green spaces that had been designated in the PGSS.¹³ This resulted in at least 40 sites being identified to be sold off in due course. There is nothing to prevent a similar exercise being repeated in the future.
3. **There is no clarity on how or when the strategy will be delivered.**
- 3.1. The PGSS aspires for everyone to have access to a high-quality park within a 10-minute walk of their home. However, it does not tell us how this will be delivered or show us where any proposed new open spaces will be located.
- 3.2. The PGSS also states that: '*This strategy seeks to encourage and guide the development of new spaces in regeneration areas - identified in the Local Plan - rather than*

⁹ <https://www.bristol.gov.uk/files/documents/2279-local-plan-review-new-protection-for-open-space/file>

¹⁰ <https://bristoltrees.space/trees/sites/browse-wards.xg>

¹¹ <https://www.legislation.gov.uk/ukpga/1972/70/section/123>

¹² R (on the application of Day) (Appellant) v Shropshire Council (Respondent) - Supreme Court Case ID: 2021/0031 - <https://www.supremecourt.uk/cases/uksc-2021-0031.html>

¹³ https://democracy.bristol.gov.uk/Data/Cabinet/201012161600/Agenda/1216_dec.pdf.

specifically outline sites for development. It is most likely that opportunities will be created in parts of the city centre, Temple Quarter, St Philip's Marsh and Frome Gateway.' However, no mechanism is proposed for how this will be achieved, nor is there information on how this will address the need for more green spaces in the more deprived parts of the city.

- 3.3. Save for what might be provided ancillary to development, no new future green public spaces have been identified for creation in the Plan.

4. Key documents are missing.

- 4.1. A number of associated strategy documents referenced in the PGSS, and that will influence the proposal, have not yet been produced. These are:
- The One City Tree and Woodland Strategy (page 18), which is still being drafted. It is not certain that it will be adopted by the Council.
 - The Green Infrastructure Strategy. We are told that is '*to be developed in 2024 and will form the council's wider approach to its network of green infrastructure (for which the Parks and Green Spaces [strategy] will form a part)*' (page 12).
 - A revised quality standard for parks (page 13). Not yet in production.
 - Bristol Blue Green Infrastructure Strategy (page 19). Not yet in production.
 - Playing Pitch Strategy (page 37). The 2017-22 version is out of date.¹⁴
 - The England Trees Action Plan 2021 to 2024,¹⁵ which is about to expire and will need to be updated. It is unclear when this will happen.
- 4.2. The draft PGSS makes a number of references to One City goals, targets and plans, but it is unclear how these documents form part of or are integrated into the obligations of and strategies developed by Bristol City Council.
- 4.3. We are told that the One City Plan was created by the Bristol City Office and launched in 2019 by the Mayor Marvin Rees.¹⁶ As far as we understand it, the Bristol City Office, One City Boards and the One City Plan exist entirely at the discretion of the Mayor.
- 4.4. We note that the City Office and Bristol One City Plan fall within the terms of reference of the Strategy and Resources Committee,¹⁷ but we are not aware that the One City Plan forms part of Council policy. Unlike Bristol City Council, the Bristol City Office and the One City Boards are both unelected and unaccountable institutions, with their members being appointed by the Mayor. It is unclear how or if these institutions will survive the passing of the office of Mayor come next May.

¹⁴ <https://www.bristol.gov.uk/files/documents/4792-playing-pitch-strategy-2017-2022/file>

¹⁵ <https://www.gov.uk/government/publications/england-trees-action-plan-2021-to-2024>

¹⁶ <https://www.bristol.gov.uk/council-and-mayor/mayor-of-bristol/city-office#:~:text=Bristol%20One%20City%20Approach,in%20the%20One%20City%20Approach.>

¹⁷ Bristol City Council Constitution part 3.2 - <https://democracy.bristol.gov.uk/documents/s91160/Appendix%20%20-%20Constitution%20for%20the%20Committee%20Model.pdf>

5. Green and open-space provision will be reduced.

- 5.1. When the 2008 PGSS was adopted, it noted that: 'In 2007 the current level for Bristol is 3.8 hectares per 1000 residents (38 square metres per capita) although with a predicted population growth of 53,800 by 2026 this figure would reduce to approximately 33 sq metres per capita.'¹⁸ At that time, a minimum per capita standard of 27.8 square metres was adopted.
- 5.2. The current PGSS draft (page 16) recognises that the current citywide per-capita area is indeed just over 33 square metres (33.37 m²) but now predicts a further reduction to 29.17 m² per capita citywide. This is based on the expected population growth over the next 15 years whilst '*aiming to introduce new green space in areas where growth will be highest.*'¹⁹
- 5.3. There will be a per-capita reduction of 39% in the central area (12.02 m² down to 7.28 m²) and 12.5% in the inner urban areas and across the city (13.13 m² to 11.48 m² & 33.37 m² to 29.17 m²), just as a result of predicted population growth. The minimum per-capita provision standard is predicted to increase marginally, but no explanation is given how this will be achieved.

6. Green and open space, including Green Belt, is being allocated for development.

- 6.1. Our representations on the Plan cite numerous examples where open space will lose its current protections or be allocated for development.
- 6.2. Of the 96 proposed Site Allocations identified in Bristol Local Plan Annex - Development Allocations 2023 proposals,²⁰ we have identified at least 35, covering some 38 hectares, which do not meet the NPPF brownfield definition and are, in fact, open space (much of it green space). Another eight proposed Site Allocation sites, covering nearly five hectares, are probably also not brownfield sites. And yet the Brownfield Register, maintained by the Council and last reviewed in March 2023, shows that there are 116 brownfield sites comprising nearly 32 hectares available for development.²¹ It is surprising that these sites have not been allocated instead.
- 6.3. The Plan also identifies two areas of Green Belt, comprising some 32.5 hectares, as suitable for development - the land adjacent to Elsbet Drive, Bishopsworth and Bath Road, Brislington.
- 6.4. It is hard to justify this, given the aspirations set out in the strategy and Bristol City

¹⁸ Section 3, page 34.

¹⁹ Chapter 4, Page 16

²⁰ <https://www.bristol.gov.uk/files/documents/6890-bristol-local-plan-annex-development-allocations/file>

²¹ <https://www.bristol.gov.uk/business/planning-and-building-regulations-for-business/planning-for-business/brownfield-land-register> & <https://bristoltreeforum.org/wp-content/uploads/2024/01/Development-Allocations-Appendix-4.xlsx>



21 January 2024

Council's declarations of Ecological and Climate Emergencies²² and its commitment to protect Bristol's Green Belt and Green Spaces.²³

7. The PGSS provision for trees is unrealistic.

7.1. PGSS Chapter 5: Priority Themes - Our Commitments, Nature at page 19 states that:

'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.'

7.2. Assuming that the PGSS has been adopted by 2025, then the next 10 years takes us nearly halfway to the One City 2046 goal of adding 795 hectares of tree canopy. Although this aspiration is for private as well as public land, even doubling the 50 hectares means that only 13% of the 2046 target will be achieved in the first 10 years, leaving the remaining 87% to be achieved in the next 10 years. This is not realistic.

7.3. It can hardly be assumed that land for trees will be six times more plentiful in 10 years' time than it is now. Natural growth may help but woodland planting can only provide tree canopy equal to the area planted. The plan also fails to take account of continuing tree losses and tree mortality.²⁴

7.4. The Climate section (page 19) states that:

'Using the Keep Bristol Cool mapping tool, we will identify priority areas where the provision of more natural vegetation, including trees, would help keep communities cooler as we expect more extreme hot weather due to climate change. We will also explore how we can ensure there are accessible, comfortable and shaded places of respite and cool corridors for movement in parks, particularly in areas classified as highly vulnerable in the Keep Bristol Cool mapping tool.'

7.5. Under the heading 'Why is Nature and Climate a priority?' (page 18), it states that:

'Bristol has declared an ecological emergency, calling for 30% of the city's land to be managed for nature by 2030. Our Managing for Nature Plan shows that 31.6% of land covered by this strategy is currently being managed for nature, but the figure for all council land is 15%. In response, we have identified the potential to create or enhance 830 hectares (ha) of natural habitats on council land, of which 771 ha are on PGSS land. With the land already managed for nature this would be a significant contribution, achieving over 70% of PGSS land managed for nature and 31.4% overall for all council land.'

²² <https://www.bristol.gov.uk/council-and-mayor/policies-plans-and-strategies/energy-and-environment/bristol-ecological-emergency> & <https://democracy.bristol.gov.uk/documents/g3185/Public%20minutes%2013th-Nov-2018%2018.00%20Full%20Council.pdf?T=11>

²³ <https://democracy.bristol.gov.uk/ieListDocuments.aspx?CId=142&MID=8798>

²⁴ <https://bristoltreeforum.org/btf-2020-newsletter/in-defence-of-bristols-trees/>

7.6. The Foreword (page 4), claims that:

'A quarter of Bristol is covered by over 400 beautiful parks and natural open spaces.'

However, 25% of 10,900 hectares (the land area of Bristol) is 2,700 hectares. The area of the 416 sites identified in the PGSS is only 1,876 hectares (some 17% of the total city). No evidence has been provided to justify the higher figure quoted. The lower, 1,876 hectares figure is more in line with the 15% of land being managed for nature quoted in paragraph 7.5 above.

7.7. The PGSS claims that there is potential to create or enhance 830 hectares of natural habitat on council land (771 ha of which is on PGSS land).²⁵ This lumps together two very different concepts - creation of new space and enhancement of existing sites - and is unsupported by any evidence. No new sites are identified for creation or enhancement in the short term.

8. The response to the Climate Emergency is inadequate.

8.1. The PGSS advises that:

*'The role of trees in our city will be pivotal in delivering protection against higher temperatures. Extensive research has highlighted an imbalance in the tree coverage across the city, particularly in certain areas of high deprivation, where tree canopy is just 9% compared to 26% in some neighbourhoods. The One CityTree and Woodland Strategy will address this inequality and ensure the benefits of trees can be enjoyed everywhere.'*²⁶

We presume that the 'extensive research' refers to work we did in 2018 using i-Tree Canopy.²⁷ As we have pointed out, the One CityTree and Woodland Strategy is still in draft and has not yet been adopted into Council policy.

8.2. The PGSS adds:

*'Using the Keep Bristol Cool mapping tool, we will identify priority areas where the provision of more natural vegetation, including trees, would help keep communities cooler as we expect more extreme hot weather due to climate change. We will also explore how we can ensure there are accessible, comfortable and shaded places of respite and cool corridors for movement in parks, particularly in areas classified as highly vulnerable in the Keep Bristol Cool mapping tool.'*²⁸

The Keep Bristol Cool mapping tool was published around July 2021,²⁹ so it is regrettable that there are still no concrete proposals in response to its analysis.

²⁵ Page 18.

²⁶ Page 18.

²⁷ <https://bristoltrees.space/trees/treecanopy/treecover-map.xq>

²⁸ Page 19.

²⁹ <https://www.bristol.gov.uk/council-and-mayor/policies-plans-and-strategies/energy-and-environment/the-keep-bristol-cool-mapping-tool>



21 January 2024

8.3. Google has produced more recent data that is used in Woodland Trust's Tree Equity Score.³⁰ This uses the same methodology across the UK and combines tree canopy data with data on heat stress and social deprivation factors at an LSOA level yet there are no proposals to adopt this nationally-accepted model.

9. Food growing and the allotments strategy 2024-39 (Chapter 6)

9.1. We have already commented on this separately in response to the concurrent consultation on the proposed changes to the allotment rules:

[Our response to the proposed changes to the allotment agreement.](#)³¹

Conclusion

The PGSS contains no details or SMART goals for how any of its aspirations will be achieved, merely indications of possible future action.

Here are our [representations on the proposed new Bristol Local Plan.](#)

³⁰ <https://uk.treeequityscore.org/>

³¹ <https://www.ask.bristol.gov.uk/bristol-allotment>