



an independent force for a **better Bristol**

*Draft version 2 dated 9 January 2024*

**Bristol Civic Society submission to the 2023/4 Parks and Green Spaces Strategy consultation**

Summary of key points

We welcome and support the general approach of the Strategy.

Our concerns are:

- as is common in strategies and plans, the tensions between the various aims are not explored. How do we know that the tensions will be managed properly? Should there be an action around setting up appropriate governance structures to ensure that the tensions are managed properly?
- we have a particular focus on space standards. The Strategy's coverage of this seems incomplete. Given the developed nature of Bristol, we accept that there are constraints on the amount of additional space to cater for population increases in inner city areas, but there is much more work to be done to clarify what that implies. We cannot support the approach without more explanation and justification of why it cannot be more ambitious. This is important because the near-final Local Plan depends on the revised standards.

Full submission

1 Main strategy (chapters 1/2/5/7)

1.1 Overall approach

**We welcome and support the general approach of the Strategy.** In particular, we support the choice of strategic principles (Collaboration, Creative solutions, Equity and Inclusion, Financial Sustainability, Informed by evidence) and priority themes (Nature and Climate, Children and Young People, Community Participation, Health and Well-being, Culture, Employment and Skills). We support the aim to set a strategic direction via 'commitments', and the attempt in Chapter 7 to describe the key strategic actions, with short-/medium-term 'key actions' and 'by 2039' targets.

The principles and themes work together to make a coherent Strategy. Given the progressive cuts in the Council's budget for parks and open spaces, it makes sense to focus on alternative resources, via collaboration and community participation, and income-producing initiatives. This in turn requires different skills in the Council's workforce. Many of the other themes are ones whose importance has become more apparent since the 2008 Strategy was written: well-being, natural habitat, local food-growing. Lastly, cultural activities can broaden the appeal of parks and help to raise income; and play facilities contribute to well-being.

**As is common in strategies and plans, the tensions between the various aims are not explored.** For instance:

- there are aims to increase the land for nature, tree canopy potential, food growing, and recreation. (There is an online [map](#) which shows an allocation by the first three of these uses, and another [map](#) showing space for recreation.)
- there is an aim of increased use for events etc, which will impact on other park users and possibly nearby neighbourhoods and the natural habitat.

How do we know that the tension between these will be managed properly? Presumably we must rely on consultation on specific proposals as they arise. But can this Strategy document set some parameters for how the tensions will be managed? **Should there be an action around setting up appropriate governance structures to ensure that the tensions are managed properly?**

We note that further detail will emerge in a number of associated documents that have not yet been produced. The Parks and Open Spaces Strategy will be unclear and incomplete without them. These are the future documents:

- Green Infrastructure Strategy (due 2024)
- a revised quality standard for parks (referenced on page 13)
- a Bristol Blue Green Infrastructure Strategy (page 19) [We are unclear what "Blue Green" means, and why it is not part of the Green Infrastructure Strategy?]
- a Playing Pitch Strategy (page 37).

## 1.2 Specific comments: use of open spaces for events and infrastructure

### 1.2.1 Events

A 'commitment' of the Cultural theme is:

"We will explore opportunities to develop infrastructure so that a larger range of parks sites can be used for medium to large sized cultural events.",

and 'Key actions' include:

- [Short-term] "Work with the City Events Team to help develop an events and activities programme that will support and contribute to the financial sustainability of the park's service and promote a good range of year-round events at a wider variety of sites."
- [By 2039] "Bristol's sporting and cultural facilities are recognised as capable of hosting international events."

And 'Key actions' for 'Financial Sustainability and Investment' include:

"Invest in increasing the number of sites that can host medium to large sized events that are organised by not for profit organisations."

Whilst putting on more events will expand the appeal of parks and help to raise income to offset budget cuts, the expansion of such activities must clearly be handled carefully so that they do not excessively interfere with other park uses. We understand that large events are currently restricted to the largest spaces - Ashton Court, the Downs and Eastville Park, and that this is probably working OK, but any expansion carries risks that need managing. For example: noise, the impact on local residents of large numbers of people converging on the park via neighbouring streets, restricted access to the open space for periods of time (including set up and removal), private control of open space for periods of time, the impact

on nature.

Presumably we must rely on consultation on specific proposals as they arise ? But this is not enough: what is crucial is how the decision is made following consultation, to ensure an appropriate balance of interests.

### 1.2.2 Commercial opportunities

'Key actions' for 'Financial Sustainability and Investment' describe the pressure for income generation:

- "Review our land and property agreements to generate the appropriate amount of revenue, both through rental income and commercial opportunities"
- "To explore the potential for more commercial activities in parks that improve the recreational offer to residents and generate income that will support well-managed green spaces."

The financial driver is clearly strong, but, as for events, any expansion of commercial opportunities carries risks that need managing. Again, what is crucial is how the decision is made following consultation, to ensure an appropriate balance of interests.

### 1.2.3 Infrastructure

A 'commitment' of the Nature and Climate theme is:

"Through the City Leap partnership, we will consider how parks and green space can be used to host low carbon energy infrastructure (such as ground source heat pumps) in a way that maintains the other benefits of our spaces."

A 'commitment' of the Culture theme is:

"explore opportunities to develop infrastructure so that a larger range of park sites can be used for medium to large cultural events"

These are acceptable aims, but again they carry risks that need managing. Again, what is crucial is how the decision is made following consultation, to ensure an appropriate balance of interests.

A Key Action of the Nature and Climate theme is:

"Subject to funding and demand, we will provide Electric Vehicle charging facilities at parks where there is scope to do so."

**We suggest that adding EV charging infrastructure should not be in the Parks Strategy, even if it only affects existing car parks in Parks.** It is not an appropriate strategy for Parks: it should take its place in the citywide EV charging strategy.

## 2. Green space provision standards (chapter 4)

### 2.1 General comments

The Strategy's coverage of provision standards seems at first sight incomplete. But the separate paper '[additional information on the provision standards](#)' complements it. (The additional information is not referenced in the Strategy.)

The Strategy rightly supports the government's ambition to ensure everyone has a green space within at least a 15-minute walk, and the One City ambition of having an excellent quality park within a 10-minute walk. **The Strategy does not explain whether or how that will be achieved.** A way of approaching this is by equating distance standards with minutes' walk, as is done in the 'additional information'.

The Strategy rightly reviews the green space provision standards – for quality, quantity and distance. It sets a new and important principle: it recognizes the difficulty of providing additional open space in a built-up environment, and it commits to improving quality where it is not feasible to improve quantity, especially in deprived areas. It is noted in the 'additional information' that quality is the overriding factor affecting the public's satisfaction with green space. **Given the developed nature of Bristol, we accept that there are constraints on this is realistic as a principle, but there is much more work to be done to clarify what that implies.**

**This is important because the near-final Local Plan depends on the revised standards.** The draft Local Plan includes GI A 'Open Space for Recreation', which obliquely refers to the Parks Strategy:

"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. ..."

The Strategy states that "We will use nationally recognised standards, such as the Green Flag Standard, as a guide to ensure our quality standards are robust and measurable". The 'additional information' explains why the Green Flag distance and quality standards are used rather than those of Natural England or Fields in Trust, and why the Fields in Trust quantity standards are not used.

Natural England's 'Urban Greening Factor' would seem a useful tool for raising quality standards, but this is not mentioned.

## 2.2 Quality

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." And "We will ... seek to develop a revised quality standard." Elsewhere in the Strategy, a few themed actions pick this up, as follow. The 'additional information' provides a high-level commentary on the process and criteria that will be used to assess quality. **This does not constitute a clear plan, but at least it indicates the direction of travel.**

A 'Key action' for 'Financial Sustainability and Investment' refers to investment to help achieve the strategic aim:

[Long-term] "Invest in smaller sites – particularly in areas where there are greater levels of disadvantage and cultural diversity – to ensure they more closely meet the needs of our diverse communities and respond to what is locally defined as a good quality park".

A 'Key action' of the Community Participation theme is:

[Short-term] "Design and trial our new approach to assessing the quality of our parks in partnership with community groups and park users."

[By 2039] There will be joint action and management plans for implementing the changes required to deliver on quality assessments.

### 2.3 Quantity

The Strategy recognizes the difficulty of providing additional open space in a built-up environment. The 'additional information' says "It is clear that our 2008 quantity standards were undeliverable and so there is a need to plan delivery in closer relationship with the way the rest of the city develops to ensure Bristol grows sustainably and fairly up to 2039." As a consequence, it sets a revised quantity standard that is not based on calculated need, just what can be realistically delivered. The Strategy does not make this clear, and it says nothing about how the amount of deliverable new open space was calculated.

The minimum quantity standards (for total open space for recreation - all types) have been restructured, and now differentiate between Central, Inner Urban, and Citywide. It says: "We have set a standard based on the expected population growth in Bristol over the next 15 years". The calculation method is not specified, but we understand that this is based not on need, but on an assessment of new 'open space for recreation' that may be provided through new development through the lifetime of the Parks and Green Spaces Strategy. This is used to derive "aspirations for new open space" of only 2.9 hectares (Central Zone) and 1 hectare (Inner Urban zone) – a calculation of what is realistically achievable. It projects no additional space in other areas of the City, so there is no projected increase for outer deprived areas across the city.

Thus population increases result in a reduction of 39% in space per person in the central area and 12.5% in the inner urban area. Whilst this may be realistic, it is still a large reduction in the space per person.

The resulting 'Minimum provision standards' are 7.75 m<sup>2</sup> per person (Central) and 11.53 m<sup>2</sup> (Inner Urban), which are way below Natural England's suggested target of 30m<sup>2</sup> per person and also the Fields in Trust targets. The 'additional information' explains that: "Whilst there are many good aspects of the updated [Fields in Trust] Six Acre standard and that it has been used as the de-facto standard in the Local Plan of a number of authorities, there remains the issue of achievability related to quantity and distance. This is particularly the case in the city centre and inner urban areas where the lack of land available for recreational space is a key issue."

**We cannot support the approach without more explanation and justification of why it cannot be more ambitious.** It should for instance be explained why Council-owned land in the centre cannot be used to provide additional space.

At a more granular level, it is left vague how a requirement for new open space, and what type, is applied to individual sites. It says: "This strategy seeks to encourage and guide the development of new spaces in regeneration areas – identified in the Local Plan – rather than 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." There is clearly a reliance on extra detail via the various regeneration area spatial frameworks

### 2.4 Distance

The locality distance provision standards for different types of space (green, children's play and young people, formal green, informal green, natural green) remain the same as they were in the 2008 Strategy. There is an online map showing where the standards are or are not met, demonstrating good coverage generally, but with some gaps. Implicit in the proposals for a limited amount of new open space in only the regeneration areas is that there will be no action taken outside regeneration areas in order to meet distance standards. **But there is no commentary on this – this needs adding.**

The test of meeting standards does not seem to distinguish by size of area of green space; perhaps it should use the minimum size of 0.2 hectares that is used for the quantity standards?

### 3. Food Growing and Allotments (chapter 6)

We have no comments on this section.