



an independent force for a **better Bristol**

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

### Summary of key points

We welcome and support the proposal for an updated Parks and Green Spaces Strategy (the strategy) given that the existing one dates from 2008 and much has changed since then including national policy, local context and production of a near final local plan. We also support the vision (page 8) and the clear emphasis on working collaboratively and creatively to improve access to green space, particularly for people living in deprived areas of the city.

We do however, have a number of practical concerns about how the strategy will be applied and what the consequences will be for both people and green spaces. Our main concerns are as follows:

- **a lack of clarity as to how the strategy will be delivered and what the consequences of following it will be:** it is not clear how tensions between the various principles will be resolved nor the weighting that will be given to any one principle if it is in conflict with another. Nor is it clear how will such difficult decisions be managed, particularly if there is to be greater community involvement.
- **the new world of partnership and mixed funding requires managing, and this may require new structures.** It is an important strategic issue, and yet the Parks Strategy is completely silent on the point.
- **the number of missing key documents, the loss of an explicit link between the strategy and the near final local plan, and differences in definition of open space between this strategy and the supporting paper (a confusion which in turn affects the draft Local Plan).**
- **a much reduced open space provision per person:** the proposed dramatic reduction in the open space available to the city's inhabitants and the very small area of new open space proposed, given population growth, especially in the centre.
- **the potential reduction in available open space through use for new infrastructure and more big events.**

Full submission

## 1 Strategy Approach (chapters 1/2/3/5/7)

### 1.1 Overall approach

**We welcome and support the broad construct of the Strategy.** It is useful to have the 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) that inform the strategy set out clearly upfront. It is also helpful to set an overall strategic direction via 'commitments', and actions (Chapter 7, including the key strategic actions, with short-/medium-term 'key actions' and 'by 2039' targets).

We agree that, given the financial pressures on the Council, it makes sense to focus on collaboration and community participation, and to look to get funding onto a more stable footing. We understand that that will require 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 play facilities contribute to the well-being of children, who as a generation face considerable physical and mental health challenges.

**However, it is not clear how the principles and themes will work together to deliver a coherent Strategy. The tensions between the various aims are not explored and it is not clear how they will be resolved.**

For instance:

- there is an intention 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 also an aim of increased use for events etc, which will impact on access for all park users, nearby neighbourhoods and the natural habitat.

This strategy should set out how these tensions will be managed and how decisions will be taken, particularly given the degree of community involvement anticipated. The trade-offs should be made explicit.

**More widely than that, the strategy does not make it clear how it will be delivered.** It should indicate more how to move from objectives to making things happen, taking into account the constraints on resources and available budgets.

And it should say more about the strategy on quantity and quality of open space, both its rationale and its delivery. To do this, the strategy will need to step outside the viewpoint of the Parks Service team, and be part of a wider Council strategy. One example of this: it would be useful to explain

how to get better space for recreation from commercial development.

**- the new world of partnership and mixed funding requires managing, and this may require new structures.**

For instance:

- 1) there are risks that commercial pressures and power structures lead to decisions that may distort the common interest. A new structure could help ensure the right balance is struck.
- 2) the stream of funding from developers, events and income of various kinds should go to a trust or some sort of endowed foundation which could be safeguarded for park use only.

It is an important strategic issue, and yet the Parks Strategy is completely silent on the point. The Strategy should at least identify it as something that needs to be addressed. The Society would be pleased to join in discussions on how parks are to be managed and funded in future.

## 1.2 Missing documents

We note that further detail is intended to emerge in a number of associated documents yet to be produced. Without these the strategy is unclear and incomplete. The missing documents include:

- Green Infrastructure Strategy (due 2024)
- a revised quality standard for parks (referenced on page 13)
- a Bristol Blue Green Infrastructure Strategy (page 19) (we assume that this is land covered by the EC definition of Blue Green Infrastructure<sup>1</sup>, but presumably it will overlap with the Green Infrastructure Strategy)
- a Playing Pitch Strategy (page 37).

## 1.3 Differences in definitions of open space

The strategy is confusing because different definitions of open space are used in different parts of the document. The separate paper on open space provision standards sets out a definition of open space for recreation, which it says carries across to the strategy. However, this applies only to the strategy's treatment of open space standards, and the strategy includes within scope (as listed at the start of Chapter 4) a number of other categories of open space (eg allotments and other food growing land, active cemeteries, land used for grazing).

## 2. Use of open spaces for events/commercial opportunities and new infrastructure

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<sup>1</sup>defined by the European Commission as a 'strategically planned network of natural and semi-natural areas with other environmental features designed and managed to deliver a wide range of ecosystem service'

## 2.1 Events/commercial opportunities

We are concerned about what the following proposals in the strategy will mean in practice when considered in aggregate.

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."

'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 a focus on fund raising does not destroy the very qualities of peace, tranquillity and green space that people seek from their parks and green spaces. There are also implications for wildlife and the potential for increased damage to habitats. Big events restrict public access to open space for periods of time (including set up and removal) and hand over public open space to private control and to paying customers only. This increased restriction on access has not been quantified nor made clear in the strategy. Any expansion of events needs careful managing and it is not clear how this will be done and whether local people will be involved in decision making. Clarity is needed here too.

## 2.1 New 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"

Given the proposed severe reduction in open space available per person in central Bristol over the coming years, we are concerned about the chipping away at existing green space in

the way proposed. Provision of new infrastructure involves a reduction in green space, increases embodied carbon despite the City's ambition to be carbon neutral by 2030, reduces access to the public during construction and damages the ecological value of the green space. There is a risk that the benefits accrue mainly to non-local visitors attracted to events, with the disbenefits suffered by local residents. We would advocate re-visiting these proposals.

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."

Provision of electric charging facilities in parks not only adds hardware/ hard surfacing but arguably also encourages people to drive rather than using active travel options. We suggest that adding EV charging infrastructure should not be in the Parks Strategy, even if it only affects existing car parks in parks. More suitable locations for charging should be identified in a citywide EV charging strategy.

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

#### 3.1 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. This additional information is not referenced in the strategy, but should be.

The Strategy supports both 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.**

The Strategy rightly reviews the green space provision standards – for quality, quantity and distance against a changed context and a rapidly expanding city population. However, open space is an essential component of sustainable development and its importance is recognized in national planning policy as being central to the achievement of sustainable development (NPPF paragraph 8). It is widely recognized that open space is important for people's health and mental well-being. Housing significantly more people in central Bristol will not meet sustainability standards if it dramatically reduces open space per capita. While it is welcome that the draft strategy commits to improving quality, especially in deprived areas, it is not acceptable that deprived inner city areas see a reduction in open space. **Much more work needs to be done to clarify what the standards mean in practice across the city.**

**Unfortunately, the near-final Local Plan no longer has an explicit link to the strategy.** Instead, it says obliquely in GI A 'Open Space for Recreation':

"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 explicit reference to the parks and green spaces strategy should be reinstated if it is intended that the local plan uses the revised standards in this strategy.

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

### 3.2 Quality standard

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 follows.

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.

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, albeit it indicates a direction of travel.**

### 3.3 Quantity

The Strategy recognizes the difficulty of providing additional open space in a built-up environment and in a city with high development pressures and seems resigned to inadequate and worsening levels of open space in Bristol given likely population increases. As a consequence, it sets a revised quantity standard that is not based on sustainable

development and calculated need, just what can be delivered within the self-imposed constraints set by council in the latest revise of the local plan and the revised strategy. The strategy does not make this clear, and it says nothing about how the amount of deliverable new open space was calculated and whether there is an up-to-date assessment of need.

The strategy on provision of open space starts with a higher baseline than the 2008 strategy, as it now includes some council-owned and operated cemeteries within scope (as per page 2 of the supporting paper). So the reduction in future provision of open space is greater than at first sight because some of the land in the city included in the new provision has merely been re-classified and is not, in effect, new open space.

**We cannot support the approach without more explanation and justification of why it cannot be both more sustainable and ambitious.** We do not deny that there may be some issue of achievability related to quantity and distance, but it should, for instance, be explained why Council-owned land in the city centre cannot be used to provide additional open space.

The minimum quantity standards (for the total open space - 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 it seems to take the actual space per person allowing for population growth, and then add a tiny bit to derive "aspirations for new open space" of only 2.9 hectares (Central Zone) and 1 hectare (Inner Urban zone). It projects no additional space in other areas of the City, so there is no projected increase for outer deprived areas across the city.

As a result, there is a reduction of 39% in open space per person in the central area and 12.5% in the inner urban area. This large reduction in the space per person appears at odds with what the strategy sets out to achieve.

At a more granular level, it is left vague how a requirement for new open space, and of 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 to be supplied via the various regeneration area spatial frameworks and development briefs which are at various stages of development. Requirements should be explicitly stated here and should not rely, given existing pressures, on vastly increased use of existing open space.

What seems lacking is any discussion of the tension between the need for open space as set out in quantity standards, and the availability of land for new open space. The supporting paper explains that "The provision standards of 2008 have proven to be undeliverable, and so the standards outlined in the 2024 Parks and Green Spaces Strategy have been proposed to

maintain ambitious targets". But there has been no public discussion about the chosen minimum quantity standard versus other options, or a comparison with other cities' provision for open space in their city centres.

### 3.4 Distance standard

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?

## 4. **Food Growing and Allotments Strategy (Chapter 6)**

We feel that the Food Growing and Allotments Strategy sits uneasily in this strategy. The former applies to land that is not subject to public access, the latter to land that is, in the main, open to the general public.

More specifically, we are concerned that the proposal to increase fees for allotments in line with the facilities provided could have unfortunate consequences for people living in deprived areas of the city whose local allotments just happen to have more facilities (page 45). We note the proposal to expand the offer of reduced fees to people on low incomes, but we would urge the council to revisit this aspect of the policy and see whether it could be better aligned with its intention to improve food equality and be socially inclusive.