



Campaign to Protect
Rural England

AVONSIDE

Site Allocations (CD/BH)
Freepost BS6529
Bristol
BS1 5BR

20th Oct 2010

Dear Sir/Madam

**Site Allocations and Development Management Options Document: Response
by Avonside CPRE**

We are pleased to note the wide scale consultation on the above document. CPRE does not wish to make detailed comments on specific sites listed in the Site Allocations section, but we strongly concur with the comments made by Avon Wildlife Trust in respect of individual sites, including those relating to non-public open spaces which are not included in the Area Green Space Plan .

We have responded to the Area Green Space Plan and enclose a copy for reference, rather than repeating our comments, given the overlap of the two consultations.

We would like to make a few comments on the Draft Development Management Policies.

Draft Policy DM7

Although it might seem to duplicate the intention of DM9, we would like to see the inclusion of the word “wildlife” in the sections on Important Open Spaces and Incidental Open Spaces

The section on Urban Landscapes appears to focus on “hills and dales” – but flat parkland as referred to under Open Spaces, would, for example also come into this category.

We would also wish to see a reference to hedgerows as well as trees in DM6 and DM7

DM10 Perhaps reference could be made to harmful loss of historical features within gardens (natural and man-made).

Avonside Branch

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The Campaign to Protect Rural England exists to promote the beauty, tranquillity and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country.

Registered charity number 1078047

Pollution Policies

These should include policies to control light pollution

Yours faithfully,

JR Kempshall (Mrs)
Vice Chair, Avonside CPRE



Response to Area Green Space Plan Ideas and Options Paper (and Relevant Sites in the Site Allocations Options Document) on behalf of Avonside CPRE

The Avonside Branch of CPRE would like to make the following observations about the Ideas and Options paper for the Area Green Space Plans for Bristol. We have largely made generalised comments about the Plans for the various Neighbourhood Partnership areas rather than relating these comments to specific sites. However when the initial consultation has been completed we may wish to make further observations.

We are aware that the sites identified for possible disposal also form part of the Site Allocations and Development Management Options document within the Local Development Framework. This parallel consultation has not been ideal in terms of clarity of purpose or understanding by local residents, particularly as the aim of the Area Green Space Plan is partly to locate potential sites which could resource improvements for existing parks and open spaces, while the Site Allocations document looks to identify proposed future use of sites and to inform calculations on potential supply of dwellings for the BDF.

CPRE Avonside Branch supports proposals for maintaining and improving existing formal parks and open spaces. However we would not wish to see this happen at the expense of some of the less formal areas of open space within the city.

We have consistently voiced concern over any proposal for large-scale disposal of green open space land with the objective of funding improvements to formal parks and gardens, particularly when the benefit is to other Neighbourhood Partnership areas.

We would naturally ideally wish to see the preservation of as much urban green space as possible, for all the well researched potential benefits which it may bring. Where space is identified as little used or problematic because of issues of security or anti-social behaviour there is scope for it to be improved and ameliorated and for support to be given to those local communities which are currently campaigning to save specific sites within their Neighbourhood Partnership area, so that they could work to improve them. There are plenty of success stories where both the communities themselves and the environment have benefitted from such engagement.

It is also evident that one-off sale of land may provide short term resources, but it is not a sustainable source of income to maintain and improve greenspace.

We have specific concerns under three particular headings:

Access to Open Space

We appreciate the fact that the disposal of open space is only proposed in neighbourhoods where the Parks and Gardens Strategy standards of access etc. have been met and exceeded. However while deprived areas of Bristol may be fairly well endowed with open spaces for historical reasons, applying the same standards of provision across all areas neglects the fact that residents in deprived areas are far less likely to be able to make regular visits to open countryside than those in less deprived neighbourhoods. It might well be argued that these neighbourhoods need more open space of all kinds than other areas. It is often overlooked that for some people the less well manicured areas of space within the city may provide them with their only experience of a “wild” natural environment. All the more important then that where development does take place there should be robust protection for hedgerows and other natural features.

Mitigation of Climate Change

Given the uncertainties about the overall effect of climate change within the next few decades, it would seem provident to preserve as much green space within the city as possible. **“Bold scale urban greening can counter the harmful effects of the urban heat island effect, reduce energy demand and improve public health”**. (Chris Baines: “Greener planning, Greener UK” Plant for Life Initiative, 2009).

The Adaptation Sub-Committee of the Committee on Climate Change in its recent major analysis of the UK’s preparedness for climate change (Sept 2010) also stresses the importance of maximising use of green space in cities to help manage surface water drainage and to cope with rising temperatures and heat waves.

Similarly, ongoing research by Katie Williams and team at the University of the West of England (see Williams K, Joynt, J and Hopkins D (2010) *Adapting to climate change in the compact city: the suburban challenge*, **Built Environment**, 36(1), pp.105-115) refers to the need for more consideration to be given to less formally protected space. **“For example, rather than promoting high-density housing and urban infill, space may be needed to provide cooling, and blue and green infrastructure (Gill et al, 2007).”**

Cautionary Approach

We recognise that there are considerable tensions between the need to provide sufficient dwellings to meet housing need and demand within the city over the coming years and the competing pressures to maintain open spaces for all the reasons referred to above. We acknowledge that the proposals to dispose of land is part of a long term plan and that there may be some scope in the future for a few small scale developments on green sites.

We would urge however that this approach is taken with extreme caution and as part of a sequential process, rather than as a one-off disposal exercise. We are concerned that if green space currently identified for disposal is released for development in the early stages of the BDF there will be a major loss in a single tranche of development which will reduce the options for alternative use of the land should the need arise.

We would wish to see robust measures taken to ensure that any proposed development is not permitted to interfere with wildlife corridors, especially in the less obvious locations and that any mitigating conditions are adhered to. It is sometimes difficult from the representation of areas of development as shown on the plans for sites in the various neighbourhood areas to determine exactly where and how the protection of green or wildlife corridors is envisaged. For example, sites BSA0206: Trymside Open Space, 0201 Elderberry Walk and 0207 Okebourne Rd Open Space where the development area appears to block off the end of the open space or allows for hard surfacing for access. The intention may be to improve “security” but it would be regrettable if the plans allowed for considerable differences in interpretation as to the exact area available for development. The detail will obviously be examined at the stage of planning applications where relevant Development Management policies will need to be adhered to, but it is important that as the Green Space plans relate specifically to green spaces that there is no future scope for misinterpretation of exactly how any preservation of wildlife or green corridors or areas is expected to be achieved.

There is also the question of possible housing development on the urban edge of Bristol by neighbouring authorities. Although those authorities will be responsible for their own green space provision it would be highly regrettable if green space had been removed within the city boundaries in neighbourhoods where large housing developments were built adjacent to those communities but outside the boundaries. Given the uncertainty about finalised LDFs for other authorities, it would again make sense to take a cautious approach to short-term disposal of land.

JR Kempshall

CPRE Avonside Branch