



Bristol Tree Forum (BTF) Responses to Matter 04

Examination of the Bristol Local Plan 2022-2040 (the Plan)

Inspectors: Louise Gibbons, Steven Lee and Benjamin Clarke

Draft Matters, Issues and Questions (MIQs)

The BTF Regulation 20 responses to the Plan

Our responses below are informed by and rely upon our responses to the 2023 consultation:

1. [Bristol Tree Forum representations in relation to the Bristol Local Plan 2023 Publication Version consultation](#) (19 January 2024 representations).
2. [BTF Representations on the Bristol Local Plan 2023 publication version - Addendum](#) (25 January 2024 representations).

We also ask the inspectors to take into account our representations regarding the 2019 consultation, which raised new proposals for the protection of open space that were not reproduced in the later 2023 consultation [PCD002b & TPC005]:

[Our response to the 2019 Open Spaces and Local Plan Review](#) (January 2023 representations).

Our representations below are shaded pale blue and prefixed 'Q[number.number] - BTF Response'. The word count does not include the headings above, this highlighted text or the reproduced text from the MIQs.

Paragraphs referred to in the National Planning Policy Framework (September 2023) are shown as NPPF [number].

We set out below why we believe the proposed Plan is neither justified nor effective, nor consistent with national policy, and therefore unsound.

Matter 04: Development Strategy and Site Selection Process (577 words)

Proposed Site Allocations

Issue 4.6: Whether the proposed site allocations are justified taking into account the reasonable alternatives, effective in terms of deliverability and consistent with national policy in enabling sustainable development?

Issue 4.6 - BTF Response

These are just some of the goals set by the PGSS:

- Ensure that at least 30% of the city's land is managed for nature and is accessible for all. We will work together with partners, communities, and parks groups to support the delivery of a further 771 hectares of new or enhanced natural habitat.
- 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.



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- Identify opportunities for parks and green spaces to provide flood protection.
- By 2041 - 2042, due to cross-sector investment, everyone, across the city, has access to excellent quality green space within a 10-minute walk from their home.
- By 2031 - 2032, people living in the 10% most disadvantaged areas of Bristol are as satisfied with where they live and the quality of parks and green spaces, as people living in the most affluent areas of the city.
- Deliver new spaces for food growing while maintaining the balance of land outlined in the wider Parks and Green Spaces Strategy.

These are echoed in the Bristol Open Space provision standards [REL008a].

In September 2021, the Council voted unanimously to protect the Green Belt and Bristol's green spaces.¹ This vote resolved, inter alia, to:

- *ask the Mayor to give a cast-iron commitment that he will look instead to increase the emphasis placed in the Authority's Site Allocations and Development Management policies on re-using or repurposing existing and emerging 'brownfield', previously developed or urban centres where not also needed as space for nature, rather than continuing to erode our surrounding fields and countryside*
- *Work with local communities across Bristol to similarly make every effort to designate much-loved green space in other parts of the city and noting that such protection for green space was proposed as part of the recent Bristol Local Plan Review.*

Despite this, of the 96 proposed Site Allocations identified in Bristol Local Plan Annex - Development Allocations 2023 proposals,² 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, open green space that could be used to help achieve the PGSS aims set out above.³

Another eight proposed Site Allocation sites, covering nearly five hectares, are probably also not brownfield sites.

Given all this, these proposals are not sound because if they are not justified or effective, nor are they consistent with national policy.

Conclusion

Given all this, as currently proposed, the Plan is not sound because it is not justified or effective, nor is it consistent with national policy.

We ask the Inspectors to find the Plan unsound as submitted, and to recommend non-adoption.

¹ <https://democracy.bristol.gov.uk/ieListDocuments.aspx?CId=142&MId=8798>

² <https://www.bristol.gov.uk/files/documents/6890-bristol-local-plan-annex-development-allocations/file> & <https://bristoltrees.space/Tree/siteCategory/LP25-Dev>.

³ See our detailed responses to Matter 17 with its schedule listing these sites.