



Bristol Tree Forum (BTF) Response to Matter 10

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 10: Biodiversity and Green Infrastructure (2,996 words)

Issue 10.1: Whether the Plan's policies on biodiversity are positively prepared, justified, effective and consistent with national policy.

General matters

Q10.1: Is the Plan's overall approach to biodiversity justified, consistent with national policy? In particular:

a) As required by paragraph 179a of the NPPF, does the plan identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation?

b) As required by paragraph 179b of the NPPF, does the plan promote the conservation,



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restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity?

Q10.1 - BTF Response

Whilst extensive resources are available which identify and map all these elements (though currently not using GIS tools), our concern is that the safeguards proposed in the Plan are not robust enough to offer anything other than lip service to the protection of biodiversity or green infrastructure.

There are no specific policies in the new Plan directed towards achieving the NPPF 8 Environmental objective, save for an expectation 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'* (Policy GI A).

Even this is tempered with a 'let-out' - *'given the developed nature of Bristol, achieving the desired level of quantity of open space for recreation, within the appropriate distance, may not always be possible due to limited land availability.'*

We welcome the aims of the Parks and Green Space Strategy March 2024 (PGSS), [REL008] and its Appendix [REL008a], to increase the amount of land available for nature but what is being proposed in the Plan suggests that the opposite will happen.

The Plan's policies are riddled with vague and ambiguous language which can only create conflicts or offer opportunities for developers to avoid these 'requirements' (see section E of our 19 January 2024 representations).

Policy BG1: Green infrastructure and biodiversity in new development

Q10.2: Is Policy BG1 justified, consistent with national policy and effective? In particular:

- a) Is the policy sufficiently clear as to what developers would be expected to deliver?*
- b) Are requirements to meet Natural England Green Infrastructure Standards and Urban Greening Factor target scores justified? In allowing the potential use of other standards, is the policy clear and unambiguous for decision makers on what would be acceptable?*
- c) How do the Green Infrastructure Standards requirements relate to the issue of Biodiversity Net Gain?*
- d) Would it always be the case the artificial grass within proposals would be resisted, even where other biodiversity net gain requirements are met? Is this justified?*

Q10.2 a) - BTF Response

No. See our response to Q10.1.

Q10.2 b & c) - BTF Response



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We endorse and support the Natural England Green Infrastructure Standards and Urban Greening Factor target scores.¹ This information can be used to inform decisions about the most effective use of biodiversity net gain (BNG) mitigation solutions both on and off site.

Q10.2 d) - BTF Response

Artificial grass destroys the underlying biome, provides no environmental or habitat or biodiversity benefits and causes long-term pollution. Ultimately, all artificial grass will require disposal yet there is no requirement that this is done responsibly.

Policy BG2: Nature conservation and recovery

Q10.3: *Is Policy BG2 justified, consistent with national policy and effective? In particular:*

- a) *Is the policy effective in protecting and enhancing sites of biodiversity value in a manner commensurate with their statutory status or identified quality, as required by paragraph 174 of the NPPF?*
- b) *Is the assessment of harm and approach to mitigation consistent with paragraph 180a of the NPPF? Is reference to Biodiversity Net Gain clear in this regard?*
- c) *Is the specific approach to irreplaceable habitats consistent with paragraph 180c of the NPPF? With regard to the Council's response to PQ129, would it be misleading to omit reference to the "wholly exceptional reasons" which are referred to in paragraph 180c of the NPPF?*
- d) *In terms of impacts on local designations, is it consistent with national policy to only resist development which has a 'significantly harmful impact' on local wildlife and geological sites, comprising Sites of Nature Conservation Interest (SCNI) and Regionally Important Geological Sites (RIGS)?*

Q10.3 a) - BTF Response

No. BG4 only imposes a requirement to '*promote the restoration of priority habitats and the recovery of priority species.*' Priority habitats and species are narrowly defined by statute.² NPPF 174 is not so constrained and protects all the '*natural and local environment*'.

NPPF 174 also requires that planning policies and decisions should '*contribute to and enhance the natural and local environment*'. BG2 merely '*expects*' development to '*take all available opportunities to connect to or enhance the integrity of the Nature Recovery Network and wider ecological networks.*

BG2 also runs counter to the now-compulsory obligations for nearly all development to deliver at least 10% biodiversity net gain (BNG) and comply with the trading rules, no matter what the quality or importance of the habitats impacted.³

¹ <https://publications.naturalengland.org.uk/publication/5846537451339776>.

² <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>.

³ <https://www.legislation.gov.uk/ukpga/1990/8/schedule/7A>.



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Q10.3 b) - BTF Response

No. NPPF 180 a) is a modified version of the widely-applied Mitigation Hierarchy⁴ and imposes a primary obligation to avoid ‘significant harm’ to biodiversity. BG2 is a pastiche of this but covers only unavoidable loss of habitats of ‘*nature conservation value*’. This is not the same as biodiversity, which has a much wider meaning. Not only is there no primary obligation for ‘avoidance’, but BG2 applies only to ‘*protected sites and species*.’

The requirements of the Biodiversity Mitigation Hierarchy (BMH) use the terms ‘adverse effects’ and ‘adversely affected’. This changes the meaning of ‘*significant harm*’ and must now act as a gloss to NPPF 180 a) together with other parts of the NPPF where BNG obligations are engaged.⁵

Q10.3 d) - BTF Response

No. At the moment, protection against the development of SNCIs is provided by SADMP DM19 which states: ‘*Development which would have a harmful impact on the nature conservation value of a Site of Nature Conservation Interest will not be permitted.*’

This will be superseded using BG2, which raises the test of harm to a ‘*significantly harmful impact*’, thereby lowering the protection which SNCIs currently have. No justification for this is offered.

It also introduces a higher standard than is used elsewhere in BG2 (or in the Plan). It also runs counter to the recent August 2024 decision in the matter of Vistry Homes Limited,⁶ which dealt with, amongst other things, the provision that planning decisions should ‘*secure measurable net gains for biodiversity*’ (NPPF 180 (d)) as a benefit and made it clear that:

Where a development is required to provide a measure in order to overcome or mitigate, or compensate for, a harm caused by that project, ordinarily that measure could not rationally be described as a benefit. So, for example, where a development would result in a loss of biodiversity, the provision of additional biodiversity on the same site or on other land nearby in order to completely offset that loss, so that in overall terms there is no net reduction in biodiversity attributable to the development, is not a benefit. It is simply the development “consuming its own smoke” [paragraph 152].

Q10.4: Are areas or sites identified as SCNI justified and based on robust and up-to-date evidence?

Q10.4 - BTF Response

Sites of Nature Conservation Interest (SNCIs) are designated for their substantive nature conservation importance, either for wildlife or geology. LPAs have no power to designate (or dedesignate) SNCIs. This is controlled by independent Local Sites Partnerships (LSP) acting

⁴ <https://www.biodiversityinfrastructure.org/handbook/3-mitigation-hierarchy/>.

⁵ <https://www.legislation.gov.uk/ukxi/2015/595/part/7A> - 37A.

⁶ ([2024] EWHC 2088 (admin)) - <https://www.bailii.org/ew/cases/EWHC/Admin/2024/2088.pdf>



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under guidance issued by Defra⁷ and the LSP's own protocols.⁸

Policy BG3: Achieving biodiversity gains

Q10.5: Is Policy BG3 justified, consistent with national policy and effective? In particular:

- a) Does the policy unnecessarily duplicate the detailed provisions of the statutory framework in relation to Biodiversity Net Gain? If so, are those provisions consistent with the statutory framework?*
- b) How does the section on the biodiversity gain mitigation hierarchy relate to Policy BG2 and is this section consistent with national policy, in particular paragraph 180 of the NPPF?*
- c) Is the policy justified and effective in seeking to “encourage” development to secure more than the minimum 10% requirement? How would this be expected to be achieved and how would it affect the decision-making process?*
- d) In paragraph 6, is reference to avoiding harm “where possible” to existing designated and non-designated habitat and species features of conservation value consistent with national policy on the protection of biodiversity assets?*
- e) Is the main modification suggested to the third paragraph of the policy, as set out in EXA002.1 necessary to make the Plan sound?*

Q10.5 - BTF Response

The Plan lacks the ambition to do anything more than comply with the bare 10% minimum BNG required under the legislation. While Defra guidance advises that: ‘*Plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development...*’,⁹ this is permitted if it is justified.

Defra’s guidance also encourages LPAs to be more ambitious - ‘*Local nature recovery strategies [to] identify the places and habitats that are most beneficial for nature and get 15% more biodiversity units in the biodiversity metric than the same habitat created elsewhere.*’¹⁰ The Plan makes no such proposals.

Q10.5 a) - BTF Response

The wording of the policy is no longer aligned with the now-compulsory BNG requirements.

Q10.5 b) - BTF Response

The BG3 definition of the Biodiversity Gain Mitigation Hierarchy is in conflict with the

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<https://webarchive.nationalarchives.gov.uk/ukgwa/20130402204735/http://archive.defra.gov.uk/rural/documents/protected/localsites.pdf>

⁸ <https://bristoltreeforum.org/wp-content/uploads/2022/08/designated-sites-protocolcriteria-v12-march-2011.pdf>

⁹ <https://www.gov.uk/guidance/biodiversity-net-gain> - Paragraph: 006 Reference ID: 74-006-20240214.

¹⁰ <https://www.gov.uk/guidance/biodiversity-net-gain-what-local-planning-authorities-should-do> -

Actions LPAs should take on mandatory biodiversity net gain.



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requirements of the BMH - see our responses to the BG2 questions above.

Notwithstanding this, we agree that offsite mitigation should be located as closely as possible to the development site and within the LPA boundary and that, if this is not possible, clear evidence must be provided to justify mitigation elsewhere.

BG3 must make it clear that the long-term funding of offsite BNG mitigation must be secured.

Q10.5 c) - BTF Response

Yes. See our response to Q10.5.

Q10.5 d) - BTF Response

No. This reference to avoiding harm “where possible” is not consistent with national policy on the protection of biodiversity assets - see our **Q10.3 b) Response**.

Q10.5 e) - BTF Response

No. The submission of a Biodiversity Gain Plan is a post-approval matter¹¹ but it is key to the successful delivery of the post-development BNG mitigation, and so should be a matter with which stakeholders can engage.

The procedures for applications made under a planning condition and consultation requirements as set out in the Town and Country Planning (Development Management Procedure) (England) Order 2015¹² contain no requirement to undertake public consultation on applications to discharge or approve a condition after a planning approval. As a result, third-party engagement with Biodiversity Gain Plans is not possible.

The current LPA guidance reflects the status quo and does not require a draft of the Biodiversity Gain Plan to be produced at validation, even though post-development BNG mitigation proposals, together with a draft Habitat Management and Monitoring Plan (HMMP), are required.¹³

The BG3 policy should require drafts of the Biodiversity Gain Plan, the post-development BNG mitigation proposals and the HMMP to be delivered with each application where BNG is required.

Generally

Now that the Local Nature Recovery Strategy has been published,¹⁴ references to it in BG3 will need to be updated. However, the LNRS will not deliver the benefits for biodiversity to which it aspires.¹⁵

¹¹ <https://www.legislation.gov.uk/uksi/2015/595/article/37B>.

¹² <https://www.legislation.gov.uk/uksi/2015/595/part/5>.

¹³ <https://www.bristol.gov.uk/residents/planning-and-building-regulations/planning-policy-and-guidance/biodiversity-net-gain-for-major-development-and-small-site-planning-applications>.

¹⁴ <https://www.westofengland-ca.gov.uk/what-we-do/environment/the-local-nature-recovery-strategy/>.

¹⁵ <https://bristoltreeforum.org/2025/01/17/the-local-nature-recovery-strategy-fails-to-deliver-for-bristol/>.



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Policy BG4: Trees

Q10.6: *Is Policy BG4 justified, effective and consistent with national policy, including:*

- a) *Is reference to the loss of ancient woodland or ancient and veteran trees consistent with paragraph 180c of the NPPF and/or Policy BG2? (See also Council response to PQ130).*
- b) *How have the tree compensation requirements been derived and are they justified?*
- c) *Is the relationship between this policy and those relating to biodiversity net gain clear and unambiguous?*
- d) *The final paragraph states that replacement trees should be provided as close as possible to the development site. Is this clear in terms of on-site provision?*
- e) *Are references in paragraph 9.1.38 to tree cover being deliberately reduced prior to an application justified and how would the Council expect to assess this (for example, what evidence would be assessed)? If justified, to be effective, should this reference be in the policy?*
- f) *Is the suggested main modification to the table, as set out in EXA002.1, necessary to make the Plan sound?*

Q10.6 - BTF Response

Policy BG4 fails to align the BNG obligations. Instead, it seeks to preserve the Bristol Tree Replacement Standard (BTRS) as a legacy policy. However, this will only apply if the tree compensation standard is not already met in full by BNG requirements. While this is better than nothing, the level of compensation will be less than is required under BNG.

Q10.6 b) - BTF Response

The justification for requiring these BTRS obligations were set out in Policies BCS9 and BCS11 of the Council's Core Strategy, both of which will be removed. To the best of our knowledge, the mechanism for BTRS compensation was not based on any systematic or scientific methodology but rather on a simple rule-of-thumb approach based on stem diameters.

Q10.6 d) - BTF Response

The requirement that replacement trees should be provided '*as close as possible to the development site*', is usually interpreted to mean that they should be planted within a one-mile radius of the development site. It is often the case that the areas of greatest development pressure have the fewest tree replacement sites. Without this approach, some areas are likely to become devoid of nature.

Q10.6 e) - BTF Response

This is expressly dealt with in paragraphs 6 and 6A of Schedule 7A of the Town and Country Planning Act 1990.¹⁶ Article 7 of the Town and Country Planning (Development Management

¹⁶ <https://www.legislation.gov.uk/ukpga/1990/8/schedule/7A>.



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Procedure) (England) Order 2015 also requires a declaration stating whether activities have been carried out prior to the date of application (or earlier proposed date), that result in loss of onsite biodiversity value ('[degradation](#)').¹⁷

Q10.6 f) - BTF Response

Yes, but see our Q10.6 b) Response.

Changes proposed to BS5837:2012 (likely to come into force in Spring 2025 and to replace BS5837:2012), will set the default measurement height at 1.3 metres above ground level, not 1.5 metres. The wording of the policy should be amended to require only that the DBH measurement to be done in accordance with BS5837.

Issue 10.2: Whether the Plan's policies on open space and green infrastructure are justified, consistent with national policy and effective.

Q10.10: Is the Plan positively prepared and consistent with national policy in terms of open space provision?

a) In this regard have the policies been based on robust and up-to-date assessments of the need for open space, sport and recreation facilities and opportunities for new provision, as set out in paragraph 98 of the NPPF?

Policy GI A: Open space for recreation

Q10.11: Is Policy GIA justified, consistent with national policy and effective? In particular:

a) Is the policy clear and unambiguous about how the scale, type and quality of open space that would be required to support new development?

b) Is it justified or effective to defer this to guidelines set out in other the Council's strategies, including the Parks and Green Space Strategy (March 2024)?

c) To be effective, should the open space standards set out in the Parks and Green Space Strategy be included in the Plan?

d) Is the suggested main modification to paragraph 9.2.6 set out in EXA002.1 necessary make the Plan sound?

Q10.11 - BTF Response

Within the Local Planning Authority (LPA), 36 of the 88 SNCIs designated have not been given protection under proposed policy GI A. Of the sites that have been given protection, 19 are a mix of LGS and ROGS designations or are designated exclusively as ROGS sites. We say that all SNCIs (including those not listed in the Plan - such as the western part of Colliter's Brook SNCI and the Yew Tree Farm SNCI) should be designated LGS sites. SNCIs meet all the criteria set out in NPPF 102, especially because of their '*... beauty, historic significance, recreational*

¹⁷ <https://www.legislation.gov.uk/uksi/2015/595/article/7/made> and <https://www.gov.uk/guidance/biodiversity-net-gain#para36> - Paragraph: 036 Reference ID: 74-036-20240214.



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value ... tranquillity or richness of its wildlife.'

We understand that the LSP has recently reviewed some SNCIs, though the results of this review have not been published. However, we are aware of a number of SNCIs where development has taken place despite the policy protection provided, such that their SNCI status is likely to have been compromised. For example, the Airport Road SNCI (BC1) has been so degraded, while the application to develop the site off Clanage Road ignored the fact that a substantial part of the site was an SNCI.

We also refer to the Council's response to PQ135 [EXA024 - page 76], which states of the other LGS sites that land already identified as Green Belt is only proposed as LGS if it is seen to have an additional local benefit (TPC005).

These same considerations apply to other SNCIs found on Green Belt land which have not been designated as LGS sites, and especially to the Colliter's Brook SNCI and the Yew Tree Farm SNCIs, both of which are crossed by public rights of way and are important to local communities for recreational activities.

See also our **Q1.28 Response**.

Q10.11 a) - BTF Response

No. The current wording uses the terms '*sufficient*' and '*proximity*' which are too vague and open to ad hoc interpretation. Objective standards need to be defined.

The PGSS does this by setting minimum standards for publicly accessible open spaces in Bristol.¹⁸ These standards need to be integrated into the Plan so they have planning weight.

Q10.11 b) - BTF Response

The PGSS and other guidelines referred to need to be integrated into the policy text to become part of the Plan. If they are not then future planning decisions are likely to ignore them. We include the proposed One City Tree Strategy, even though its status as Council policy is unclear.

Q10.11 c) - BTF Response

Yes. See answer to Q10.11 b).

Q10.11 d) - BTF Response

No. See our answers above.

Council response to PQ132 - BTF Response

No.

The explanatory text to GI1 (including paragraphs 9.2.6 & 9.2.7) is for guidance only and forms no part of the policy. It carries little or no planning weight should a conflict arise between the

¹⁸ <https://www.bristol.gov.uk/files/documents/7566-minimum-standards-for-publicly-accessible-open-spaces-for-recreation-in-bristol/file>



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wording of the policy and these notes.¹⁹

The Council strategies referred to are not identified in the Plan. Only the Council's response to PQ132 identifies them as the PGSS. These strategies must be expressly referenced in the policy text to give them planning weight.

Policy G11: Local Green Space

Q10.12: Are the LGS identified under Policy G11 justified and consistent with paragraphs 101 and 102 of the NPPF? Have they been identified using a robust and proportionate evidence base?

Q10.13: Is there any evidence to suggest any individual LGS would not be consistent with national policy?

Q10.14: Is Policy G11 consistent with paragraph 103 of the NPPF? In particular, would the provisions of the policy allow for the forms of development set out in paragraphs 149 and 150 of the NPPF in principle, or other forms of development where 'very special circumstances' exist? Would Policy G11 be more restrictive than national policy in this respect?

Q10.15: Notwithstanding paragraph 103 of the NPPF, where LGS is also open space (as defined by the NPPF) would Policy G11 be consistent with paragraph 99 of the NPPF?

Q10.16: EXA002.1 suggested a modification to the Policies Map to include the park known as Filwood Park as a Local Green Space. Is this modification justified and necessary to make the Plan sound?

Q10.12 - BTF Response

NPPF 101 '*... allows communities to identify and protect green areas of particular importance to them*'. The criteria as set out in NPPF 102 states that their designation should be '*... demonstrably special to a local community and holds a particular local significance ...*'

As far as we are aware, local communities were not consulted about the designations or told why many of the sites currently protected under the Local Plan have been excluded.

See also our **Q1.28 Response**.

Q10.13 - BTF Response

None that we are aware of, save that some sites have not been designated as LGS that should have been - see our **Q10.4 & Q10.11 - BTF Responses**.

Others have only received partial designations. For example, the proposed LGS designation of the Downs (LGS32009) has omitted all the area within the Downs to the east of the A4176.²⁰

¹⁹ Sections 38(6) of the Planning and Compulsory Purchase Act 2004 and 70(2) Town and Country Planning Act 1990.

²⁰ <https://www.bristol.gov.uk/files/documents/7599-tpc005-local-green-space-and-reserved-open-green-space-topic-paper-november-2023/file> - Page 92.



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Q10.14 - BTF Response

Policy GI1 is not inconsistent with those for Green Belts, save, perhaps, where an LGS is coterminous with Green Belt land or part of it.

The provisions for the forms of development set out in NPPF 149 & 150, or for other forms of development where 'very special circumstances' exist are appropriate given the peculiar role of Green Belt land - to prevent urban sprawl by keeping land permanently open (NPPF 137). As such, Green Belt is found only on the edges of only some urban areas where it is considered necessary to have specific Green Belt protection.

The designation of LGS sites uses different criteria to those used for Green Belt designation (NPPF 102). Whilst new LGS sites should only be designated when a plan is prepared or updated and are capable of enduring beyond the end of the plan period, new sites can be created or removed as circumstances require.

Ancillary development on a proportional scale that supports the function and role of the LGS is permitted, provided it does not have a harmful impact on the space as a whole. This is similar to caveats NPPF 149 a) to d).

Q10.15 - BTF Response

No. NPPF 99 refers to existing open space, sports and recreational buildings and land, including playing fields. Proposed policy GI1 makes no reference to existing open spaces, etc.

Also, the guidelines set out in the council's strategies need to be explicitly referenced in the policy text.

Q10.16 - BTF Response

More than half of what is now known as Filwood Park is designated as an SNCI (BC1 - Airport Road), though it has been substantially degraded as a result of nearby development on the site.

In order to support nature recovery and biodiversity, all land types named in SADMPs DM17 & DM19 - Important Open Spaces, Unidentified Open Spaces, Urban Landscapes, SNCIs & Wildlife Corridors (including where allocated for development) - should be designated as LGS.

Policy GI2: Reserved Open Green Space

Q10.17: Is Policy GI2 justified, consistent with national policy and effective, including:

Are areas of Reserved Open Green Space identified on the policies map justified?

Is the policy consistent with paragraph 99 of the NPPF in relation to the assessment of the loss of open space?

Paragraph 9.2.16 refers to the policy approach allowing local communities to consider and review the approach to open spaces in their areas. Does this refer to anything other than review through future Local Plans or Neighbourhood Plans?

Q10.17 - BTF Response



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We repeat our response about the lack of community engagement in Q10.12.

Policy GI2 is not consistent with NPPF 99, whose caveats are not incorporated into it. In particular, there is no requirement for an assessment to be undertaken, nor is there any requirement for the land lost to be '*replaced by equivalent or better provision in terms of quantity and quality in a suitable location*' or that it be demonstrated that '*the benefits ... clearly outweigh the loss of the current or former use.*'

We are told that the policy allows local communities to consider the approach to open spaces. However, no such requirement is written into the policy text nor is there any mechanism to oblige developers or planners to undertake this on a case-by-case basis.

The explanatory text at paragraphs 9.2.16 to 9.2.19 is for guidance only and forms no part of the policy. As such, it carries little or no planning weight should a conflict arise between the wording of the policy text and this guidance. The wording of the policy text takes precedence.

Policy GI3: Incidental Open Space

Q10.18: Is Policy GI3 justified, consistent with national policy and effective? In particular, is the policy consistent with paragraph 99 of the NPPF in relation to the assessment of the loss of open space?

Q10.18 - BTF Response

No. We repeat our response about the lack of community engagement in Q10.12.

Policy GI3 states that loss of open space will not be permitted where the space is locally important for recreation and leisure use. However, there is no mechanism proposed for establishing this. All we are told is, at paragraph 9.2.22, that account will be taken of their contribution to the design of the area, their level of use by local people and the availability of alternative provision in the immediate surroundings.

We repeat our response to Q10.17.