

RESPONSE TO LOCAL PLAN

Statement by Directors of Stride Brothers Ltd

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?

Responses

1) No, the processes for identifying candidates for Local Green Space included in the draft local plan are flawed. They do not follow the guidance in the NPPF and have been applied in a defective way. It appears that the process followed has been;

- The council has identified the areas they wish to include, based on their own determinations
- A process has been devised, based on the NPPF criteria
- The pre-determined areas have been matched to the process devised and if they don't meet the criteria, they have been matched to it anyway and proposed as LGS or Reserved Open Space.

2) There is a considerable difference between the process set out in the Council's document 'Local Green Space and Reserved Open Space Topic Paper'

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

and the replies to questions from Stride Brothers from Council staff about this process, set out in the emails in the attached Word document: 'LGS designation referral emails 2023 SBL and BCC'. The process set out in the Topic Paper is methodical and follows detailed steps that closely follow the NPPF guidance. However, the process indicated in the emailed responses indicates a much more arbitrary process.

3) As we understand it, the process for the areas nominated to be LGS started with the areas previously designated as Important Open Spaces and has then used the NPPF criteria to justify their inclusion as LGS. This is despite BCC staff indicating that the NPPF criteria was not essential to designation as LGS (Colin Chapman's email of 21/2/23 Para 8).

4) The process was largely desk based and carried out on the basis of using the previous local plan designations. The proposed local plan is being used to deepen the designation of those areas already subject to existing designation under the previous plan. The current process has taken little notice of local residents or of landowners, as the consultation was very limited and depended on these parties being aware of the process and choosing to engage with it. The implications of the NPPF- that areas should be identified by local residents- has not been the route used.

5) The process included areas of land that were geographically linked but were significantly different in characteristics in a single proposed LGS nomination. NPPF criteria which applied to one of these linked areas has been taken as applying to the whole area, even if the areas are substantially different in character. The inclusion of areas of land under different ownerships and with different characteristics in a single LGS nomination should be seen as falling under the NPPF proscription of 'Extensive areas.' This should result in the nomination of the areas being rejected.

6) The process of identification and proposed designation took no notice of any ongoing representations against the existing designations or of alternative proposals for the use of the land concerned. Land that was not included in the green belt could be available for house building or other development but some areas were proposed as LGS whilst the plan also proposed removing certain areas from the Green Belt in order to meet development needs.

7) The application of the different stages of the process set out in the Topic Paper are not transparent and the final Assessment stage is unclear. Although this section states that most areas fall into specific categories which either fall into LGS or Reserved Open Green Space categories, it is not stated which specific areas fell into which of the categories identified at Table 4. It also fails to identify how areas that did not fall into the Table 4 Categories were finally pushed towards a specific designation.

8) Our understanding is that all the areas initially identified as candidates for LGS designation were included in the final list of LGS areas. This implies that the process contained some element of bias or a predisposition for their inclusion.

9) Our specific objection is the proposed designation of LGS 17004 'Fields above Lawrence Weston Moor.' The area concerned covers a number of fields under the ownership of two parties but currently used by The Avon Centre as an equestrian centre providing horse keeping, riding lessons and other services including riding and other services for disabled children. The Northern part of the area is in the ownership of The Avon Centre and includes fields and woodlands sloping down towards the adjacent motorway. The southern area of the site has a different character. It slopes in the opposite direction and is adjacent to housing and a major road as well as the large Blaise Castle estate. It is poor grazing land and has formed part of the land bank of the local housebuilding firm of Stride Brothers Ltd since 1942. It was originally designated by BCC as the site for the proposed Henbury School. Part of the land was developed as Woodgrove Road in the 1960s.

10) The Stride Brothers land adjacent to Woodgrove Road has been included in a number of local authority designations as though it were part of the land belonging to The Avon Centre and the current Directors have been making representations against these since they became Directors. The land is different in its make-up and aspects from other areas of LGS 17004 and should be treated separately.

11) The designation documents identify 17004 as meeting the criteria of the NPPF in relation to Tranquility, Beauty and Wildlife. The Topic Paper Table 2 sets out the high levels to be met by areas that would qualify them as LGS. We contest all of these in relation to the part of the area we are concerned with which has been identified as meeting the criteria for Tranquility, Beauty and Wildlife. We contend that the site concerned fails to meet the high bar set in Table 2.

Tranquility; The area is not noticeably tranquil. It is adjacent to a busy road at its Southern end. It is overlooked by the houses on Woodgrove Road and the houses behind them on Kingsweston Lane. Apart from a footpath, it is not available to be enjoyed by local people as it is used for grazing livestock.

Beauty; This is a subjective matter but it is not a particularly beautiful area. It is grazed pasture of fairly poor quality. It has some veteran trees on it which were part of

the original planting of the Blaise Estate and is a slope, but it is significantly outclassed for beauty locally by the adjacent Blaise Castle Estate. Its beauty is marred by local housing, the presence of a municipal Graveyard next door and the functions of the site for livestock grazing which means it is heavily fenced, grazed and has a functional feel to it, including a lengthy driveway across it to the Riding Centre.

Wildlife: The nature of the land is largely agricultural, with fences covering the majority of field edges and the land is heavily grazed. An ecological report for Stride Brothers identified little wildlife interest on the land or using it. It is poor in Flora and Fauna, despite increasing tree cover and managing some areas for Wildlife. There are no viewing or other facilities that would provide public access to any nature interest at the site. The designation of this site as being of a site of Conservation Interest is also contested due to the relative paucity of wildlife on the site.

12) 17004 also fails to meet the NPPF criteria of its importance to local people. It has limited public access and is tucked away from interaction from the public, who have immediate access to a wide range of alternative green areas very close to this site, with the Blaise Castle Estate, its car-park, museum, play areas and historic sites far more accessible within a few yards of the site. Although there are local residents who would like to stop further development on the site, this does not meet the NPPF criteria for local support for the site to meet the level of designation as Local Green space. There are no friends groups or other groups using this site locally.

13) 17004 is included to the Henbury Conservation area, which designation is largely due to the Blaise Hamlet model village. However, it is some distance from it and has no overview or bearing on the setting of the Conservation area. This has been accepted by planners in the past when the development of houses on Kingsweston Lane and Woodgrove Road took place.

14) 17004 does not meet any of the criteria groups set out in the BCC Process for classifying areas of green space in its Topic Paper at Stage 3. Page 12 states *'Following an initial review of open spaces, it was identified that sites could be broadly grouped into different types of open space, which meet the criteria defined in Stage 2. Defining open space types helped to guide the process of designation of sites by giving an indication of what type of space would be subject, in principle to either of the designations.'* This area, and possibly a number of others, does not meet the listed groups as suitable for LGS- as set out in Table 4 and listed below.

- Traditional / Multifunctional Parks
- Destination Parks
- Town and Village Greens
- Green Common Land
- Local Nature Reserves
- Allotments

15) We are aware that the Inspectors have been clear that they are not reviewing the Omission sites proposed for development but rejected so lying outside the proposed local plan. However, in the case of this site, the proposal to include it as LGS appears to be the key element in rejecting the site from the Plan's accepted development sites. BCC have stated that the land concerned had been considered for development (email from C Chapman 21/2/23 para 9- The potential for housing would have been taken into account but this would not have been compatible with the characteristics of the site.) It looks like the nomination of

the site as LGS has been used to determine its unsuitability for housing, despite it being an available development site outside the green belt with existing housing on part of it. In preference, BCC has chosen to de-designate areas of the Green Belt so they can be available for housing.

16) We contend that the proposed designation of this land as LGS demonstrates a general failing in the process followed in identifying land as suitable for LGS.

Stride Bros Ltd

Founded 1848

www.stridebrothers.co.uk

Registered in England, Company no. 292435

Registered office: c/o A.E.Huntbach co ltd, 147 Whiteladies Road, Bristol, BS8 2QT