

Communities Scrutiny Commission Supplementary Information



Date: Thursday, 14 September 2023

Time: 5.00 pm

Venue: The Bordeaux Room - City Hall, College Green,
Bristol, BS1 5TR

Item 6 - Public Forum items – questions and statements

Up to 30 minutes is allowed for this item.

Details of questions and statements received for this meeting are enclosed.



Communities Scrutiny Commission 14 September 2023 Public Forum – Questions and Statements



Public forum items have been received as listed below (full details are set out on the subsequent pages):

PUBLIC QUESTIONS

1. Mark Ashdown, Bristol Tree Forum: Agenda item 10 – Draft Tree and Woodland Strategy
2. Len Wyatt, Bristol Parks Forum: Agenda item 8 – Parks and Green Space – Funding; Agenda item 9 – Parks and Green Space Strategy; Agenda item 10 – Draft Tree and Woodland Strategy

PUBLIC STATEMENTS

1. Suzanne Audrey – Freedom of Information requests
2. Len Wyatt, Bristol Parks Forum: Agenda item 9 – Parks and Green Space Strategy; Agenda item 10 – Draft Tree and Woodland Strategy
3. Susan Carter, Bristol Walking Alliance: Agenda item 9 – Parks and Green Space Strategy; Agenda item 10 – Draft Tree and Woodland Strategy
4. Mark Ashdown, Bristol Tree Forum: Agenda item 10 – Draft Tree and Woodland Strategy
5. Heloise Balme: Agenda item 9 – Parks and Green Space Strategy



PUBLIC QUESTIONS

1. QUESTIONS FROM MARK ASHDOWN, BRISTOL TREE FORUM

Agenda item 10 – Draft Tree and Woodland Strategy

Question 1

The proposed strategy has set a target to increase city tree canopy cover (TCC) by 795 hectares by 2046, giving a total canopy of 24%.

The One City Plan includes a target to increase Bristol's tree canopy cover by 25% by 2035 and to double it by 2046.¹

¹ BRISTOL AND THE SDGs: 2022 REVIEW OF PROGRESS, CHALLENGES AND OPPORTUNITIES - <https://bristol.ac.uk/cabot/media/documents/bristol-vlr-2022.pdf>
- page 40

On the basis that the current TCC is 16.9%, this is an increase of just over 70% in 22 years (from 1 January 2024).

Question 1a

Has the One City Plan to double TCC by 2046 now been abandoned?

Officer response:

The draft strategy sets an absolute target to increase city tree canopy by 795 ha to achieve 24% overall – if achieved, this would double what was understood to be the city's tree cover at the time the One City Plan target was set.

Question 1b

What are the Bluesky tree-map ward-level TCC values which yield the 16.9% overall TCC value? Please provide these.

Officer response:

The per ward tree cover data is to be released following calculation.

Question 1c

Does the 16.9% TCC estimate have error bounds? If so, what are these?

Officer response:

Accuracy of data has been advised by Bluesky International Ltd., the company providing the National Tree Mapping (NTM) data.

Bluesky International Ltd state:

'The National Tree Map (NTM) is a unique, comprehensive database of location, height and canopy/crown extent for every single tree taller than 3m, covering the whole of England, Scotland, Wales, and the Republic of Ireland. NTM is updated on a 3-year rolling cycle as new aerial photography becomes available, ensuring that it remains the most detailed and up-to-date tree map ever.

The production of NTM is a semi-automated process, using Bluesky's geographic data, including aerial photography, colour infrared, and digital height models. The data is then processed through complex algorithms produced by the Bluesky team of GIS and Remote Sensing specialists before being quality checked to ensure no area is missing or misidentified'.

Accuracy of the data provided has been assessed:

Percent accuracy = $100 - [(VA - VO)/VA \times 100]$

Where VA is the most accurate dataset (manually digitised), and VO is the original dataset (NTM).

This based on a sample of sites measured nationally.

The NTM in urban areas has an average accuracy of 98.94%.

The analysis shows that the NTM data over-estimates tree canopy. This is likely to be caused by the input data resolution compared to manual digitising (in the accuracy assessment. Bluesky International Ltd., advise that this is subject to review.

Question 2

Target B is that Protected woodland will be in good management by 2046.

Question 2a

What is meant by 'Protected woodland'?

Officer response:

Protected means woodland designated as a Site of Nature Conservation Interest (SNCI) - this includes international and national nature conservation designations.

Question 2b

How will it be protected?

Officer response:

As above – sites designated are set out as prescribed, see [Local plan \(bristol.gov.uk\)](https://www.bristol.gov.uk/local-plan)

Question 2c

Is this woodland mapped? If so, may we see the map?

Officer response:

SNCI's are available @ [Bristol - Pinpoint local information](https://www.bristol.gov.uk/pinpoint-local-information)

Question 2d

Has a Protected woodland management plan been prepared? If so, may we see it?

Officer response:

A protected woodland management plan has not been prepared for all woodland in the city – which would include a range of landowners. The strategy seeks to bring all such protected woodland into positive management which will require cooperation from landowners to develop such plans and enact positive management.

Question 3

Question 3a

Can the authors provide a list of meetings with BCC Departments and other stakeholders to discuss the draft tree strategy?

Officer response:

Meetings held or attended following drafting stage:

4th September – One City Office and BCC external communication team

29th August – Exec briefing

22 August – Woodland Trust and Forest of Avon Trust

10th August – Exec briefing

7th August – GIS team – mapping

22 June – BCC staff / departments Strategy development drop in session

21st June – West of England Tree and Woodland Strategy group

22 June – Strategic Climate and Ecological Emergency Programme manager

12th June – GIS team - mapping

2. QUESTIONS FROM LEN WYATT, BRISTOL PARKS FORUM



Bristol Parks Forum

Campaigning to protect and enhance all public green space in the City of Bristol.

See our Vision for Parks & Green Spaces at

www.bristolparksforum.org.uk/vision

Questions - Agenda Items 8, 9 and 10

The Bristol Parks Forum is the only community voice dedicated to all publicly owned parks and green spaces in Bristol. We work with Bristol City Council to ensure our spaces are well looked after and to help local groups to enhance their green space. Further information about the Forum can be found at <http://www.bristolparksforum.org.uk/>

Agenda Item – 8 - Parks and Green Space Funding

Question 1 – Page 26 Does “expanding cultural events and activities in parks” include all parks and green spaces owned by the City Council?

Officer response:

This would not include all parks and green spaces owned by the City Council, we would need to assess the suitability of sites when considering this.

Question 2 – Page 26 - What are you market testing the services against?

Officer response:

The costs of delivering services which we provide are based on rates we charge; this can be on a square or linear metreage rate or another rate which is applicable to a task or activity which is delivered. One route we can use is to bench mark the cost of delivering services with other core cities who provide in house services.

Question 3 – Page 26 - What is meant by “receiving value for money” in the statement. And how is this review being carried out?

Officer response:

The parks service is supported by internal and external organisations for service delivery, equipment, and materials etc. This supports the day-to-day operation of services we provide across the parks and green spaces service area. We will test that the rates and the services provided are delivering value for money. One route we can take is through bench marking with core cities and other councils we work with to ensure value for money is be delivered.

Agenda Item – 9 - Parks and Green Space Strategy

While acknowledging the ongoing work being carried out by the officers and Cabinet members involved:

Question 1 – What is meant by Recreational Green Space, the term used on the typology plans? Pages 56 to 70.

Officer response:

The 'Recreational green space' designation are spaces that are publicly accessible green space – that includes closed burial grounds.

Question 2 – What is the relationship between the Strategy; and the forthcoming Local Plan?

Officer response:

There is a direct policy relationship between the two plans. The draft Local Plan policy for open space for recreation expects development to ensure a sufficient quantity, quality and proximity of open space for recreation. The Local Plan is expected to go to public consultation in November this year.

Question 3 – What is the relationship between the Strategy; and the planning process for decisions on individual sites?

Officer response:

The PGSS provides evidence and guidance to inform the development management process for decisions, as it relates to individual sites.

Question 4 – Does the Strategy enable a consideration of a large new green open space in Central Bristol?

Officer response:

The Strategy itself does not enable 'large new green open space', but instead the following planning documents relevant to the central area state what plans there are for green spaces:

- the City Centre Development plan which has plans for greening the Broadmead area and improvements to Castle Park,
- the Temple Quarter development frame work for improvements around Temple Meads - particularly plans emerging in St Philips which is looking at Sparke Evans park improvements as well as other opportunities along the river and feeder canal,
- Frome Gateway framework will be out to consultation very soon which also set out improvements to the green space in the area and restoration of the river, and
- the upcoming master plan for Western harbour which will enhance and potentially expand public space

Managing for Nature

Question 5 – What is the role of species found on individual sites in the Managing for Nature approach?

Officer response:

The managing for nature approach includes consideration of the West of England Nature Recovery Network (NRN) and Bristol Wildlife Corridors (BWC). The NRN and BWC's use key species to define a footprint of connected habitat (for woodland, grassland and wetland habitats) based on the 'dispersal distances' of such species. see [Nature Recovery Network - WENP](#). Where new nature spaces are created, the primary approach is to provide relevant habitat to address the needs of a range of relevant species, rather than a focus on species per se. It is expected that a mosaic of habitats will be created at a local scale to provide for a range of species. Further, the Local Nature Recovery Strategy is expected to define a range of species for which targeted actions would be relevant to compliment a habitat approach. For Sites of Nature Conservation (SNCI) management plans will be informed by species recorded for those sites, with relevant actions for such species, including the potential to encourage absent species.

Agenda Item – 10 - Draft Tree and Woodland Strategy

Bristol Tree and Woodland Strategy

Question 1 – What does the scale – “Least combined impacts/Most Combined impact” mean?
Pages 119 to 134

Officer response:

The map shows the highest combined score for the four impact criteria and conversely the lowest combined score. Each criterion is a 1-4 scale, or weighting, as explained in the report attached.

Question 2 – What is the relationship between the proposals and existing non-woodland habitats or on areas of non-ecologically valuable grassland in those sites?
Page 110

Officer response:

The Tree Impact Criteria set out benefit received from tree planting (by category and by degree). The criteria do not define whether trees should be planted or not. The PGSS tree planting opportunity report sets out where tree planting is appropriate – intending that this work sets out the scale of potential to increase tree canopy with PGSS land. On the test of impact on existing sites it is more likely that non-ecologically valuable grassland would be considered for tree planting, but other considerations would come into play e.g., whether a different habitat was prioritised by the Nature Recovery Network, or some other land use.

Question 3 – What is the relationship between the proposals and existing uses of the sites (eg: dog walking, events, sports)?

Officer response:

The PGSS tree planting opportunity report, as stated above, aims to understand the potential to increase tree canopy across PGSS land. In making this assessment, certain primary land use has identified where tree planting would be harmful to current use including formal sport or event spaces. Otherwise, design considerations would take into account a range of site use, including dog walking. The principle of increasing tree cover (by planting or natural regeneration) on public open space is to maintain access.

STATEMENT 1 - Statement from Suzanne Audrey: Freedom of Information requests

I trust members of the Communities Scrutiny Commission are aware of the Freedom of Information Act 2000 (Section 48) Practice Recommendation from the Information Commissioner's Office to Bristol City Council on 30 August 2023 (Reference FPR0987672), and the impact this has on public confidence in the Council's information rights practices. Key sections are reproduced below.

Summary

Bristol City Council (the Council) has had a consistently poor level of performance in terms of its response times to FOIA requests. This has been highlighted by the disproportionately high number of complaints about response times submitted to the Information Commissioner. Following engagement by his staff with the Council about the underlying reasons for these failings, the Commissioner has reached the view that the Council's request handling practices do not conform to part 4 of the section 45 Freedom of Information Code of Practice, issued by the Cabinet Office in July 2018 (the Code).

Recommendations

Despite ongoing informal engagement over a significant period around the issue of timeliness, the Council's timeliness rate for responding to information requests continues to be poor. The Commissioner has therefore designed the following recommendations to support and enhance the Council's plans to improve its information rights practices. In considering these recommendations, we expect the Council to ensure that it meets the requirements of all information rights legislation to which it is subject.

Reasons for issuing this Practice Recommendation

The Council has consistently been one of the public authorities within the local government sector about which the Commissioner has received the most FOI complaints in recent years. Between 1 April 2022 and 15 August 2023 the Commissioner received 61 complaints about the Council. The Commissioner also received a significant number of complaints about the Council in the years immediately preceding this. Many of the complaints the Commissioner has received included a timeliness breach as the request had not been responded to within the statutory time limit.

The Council's own figures show that, for the month of June 2023, only 56% of requests were responded to within the time for compliance. The Council has also confirmed that as of 20 July 2023, its response was overdue to 147 FOI requests in total. Of these 147 requests, 39 exceeded the statutory limit by up to 20 days, 96 exceeded the statutory limit by between 21 and 100 days, and 12 exceeded the statutory limit by over 100 days.

This practice recommendation formalises the Commissioner's concerns and holds the Council accountable for improving its freedom of information request handling practices and, in turn, increase public confidence and trust in its information rights practices.

Failure to comply

A practice recommendation cannot be directly enforced by the Commissioner. However, failure to comply with a practice recommendation may lead to a failure to comply with FOIA, which in turn may result in the issuing of an enforcement notice. Further, a failure to take account of a practice recommendation may lead in some circumstances to an adverse comment in a report to Parliament by the Commissioner.

The Council should write to the Commissioner by the end of 31 December 2023 to confirm that it has complied with its recommendations and how it has achieved this. The Commissioner will have regard to this practice recommendation in his handling of subsequent cases involving the Council.

[Microsoft Word - DRAFT Practice Recommendation - Bristol City Council FINAL \(ico.org.uk\)](#)



Bristol Parks Forum

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in the City of Bristol.*

See our Vision for Parks & Green Spaces at

www.bristolparksforum.org.uk/vision

STATEMENT 2

Statement to Communities Scrutiny Commission – 14th September 2023

Agenda Items 9 and 10

The Bristol Parks Forum is the only community voice dedicated to all publicly owned parks and green spaces (PGS) in Bristol. We work with Bristol City Council to ensure our spaces are well looked after and to help local groups to enhance their green space. Further information about the Forum can be found at <http://www.bristolparksforum.org.uk/>

Agenda Item – 9 Parks and Green Space Strategy

Agenda Item – 10 Draft Tree and Woodland Strategy

The Bristol Parks Forum Committee would like to make the following points.

We have experience of dealing with complex policy situations as seen in our vision for 2030 which informs our work. www.bristolparksforum.org.uk/vision

We appreciate the work which has been done so far. The submissions as they stand are incomplete, so we have pieced together “missing text” from our knowledge of the potential direction of the Strategies; and of our PGS.

We welcome statements to work with local parks groups and communities; and links to initiatives to improve accessibility for various groups to the benefits that PGS can provide.

We note that the One City Climate Change Strategy asks for the natural environment to be restored, protected and enhanced; and adaption to limit the damage to wildlife, whilst supporting opportunities for recovery and protection of species.

We ask for statements in both Strategies to ensure that when considering individual sites that a “joined up” consideration of the implications of changes on existing features, functions and uses of the site, is carried out alongside assessing the future opportunities. This will help proposals be more sensitive to the sites, and potentially more acceptable to those who use the sites.

We also ask for wording to be included to enable a practical consideration of a new large green park in Central Bristol (eg: in the St Phillips area) to support the thousands of new residents who are, and may be moving into the area.

Bristol Parks Forum Committee, 12 September 2023



Bristol Walking Alliance public forum statement: strategies for parks and green spaces, and for trees and woodland

Introduction

1. Bristol Walking Alliance (BWA) is a consortium of organisations and individuals which campaigns to improve the walking environment. We keep in close contact with officers at the City Council and have welcomed opportunities to be involved in the preparation of both the draft strategy on parks and green spaces and the draft strategy on trees and woodland.

2. We published our own proposals in *50 Ways to Better Walking* (see <https://bristolwalkingalliance.org.uk/wp-content/uploads/2021/11/BWA-50-Ways-to-Better-Walking.pdf>). These recognise the importance of green spaces and trees (see p11 in particular). We therefore support both draft strategies, with some reservations as set out below. **We would like there to be public consultation on the tree and woodland strategy.**

Parks and green spaces

3. We are delighted there is to be consultation on the parks and green spaces strategy at last: it has been much delayed. We have expressed concern that recreation interests have not been much involved so far. They are not acknowledged in the Vision and the Priority Themes. It is important that they are not overlooked: the city's parks and green spaces should, in our view, be recognised as primarily an amenity for **people**. Managing for nature and other purposes is not always compatible with this. Leaving grass uncut, growing food, planting trees and creating wildflower meadows all restrict the areas where people can walk at will, kick a ball around or have a picnic. The recreation interest of sites needs to be fully considered. For walking, parks and green spaces are vitally important as attractive transport routes, as a destination for walks, and as places in which to enjoy walking at leisure.

Trees and woodland

4. The draft tree and woodland strategy proposes a huge increase in the city's tree canopy which will have major effects increasing over time. We are in general keen to see more trees, especially along streets, but they need to be planted with care. We fear that a crude quantitative target will lead to more inappropriate planting in parks and green spaces, where it is easiest, rather than along streets where it is more needed. We are only partly re-assured by the suggestion that the tree planting target may be reduced after other strategic priorities have been considered (p107). As explained above, we are not confident that the Park and Green Spaces strategy will make recreation and amenity the priority they deserve.

5. Some of the claims for the benefits of trees (p109) are over-stated: woods are not synonymous with green spaces. Research has generally shown that people prefer walking in open spaces than in woods, because there is more sunshine, better surveillance and less likelihood of getting lost.

6. Trees are an important element in the landscape that can affect its amenity value for generations, for better and for worse. ***There should be public consultation on this strategy, and ongoing stakeholder engagement in its implementation, in parks and open spaces and along our streets.***

Bristol Walking Alliance

13 September 2023



STATEMENT 4

Bristol Tree and Woodland Strategy, second draft: Bristol Tree Forum Statement to the Communities Scrutiny Commission, 14 September 2023

To be effective, a tree strategy needs to be integrated into the Local Plan. It appears that there are no plans to prepare a separate BCC tree strategy to be adopted as part of Bristol's Local Plan.¹

The Bristol Tree Forum's only involvement in the development of this Bristol Tree and Woodland Strategy document has been to attend two *Trees in the City* sessions in March, where our contributions were recorded on Post-It notes. We have offered our help and support and suggested meetings to look at how best to collaborate, but our offers, which remain on the table, have not been accepted.

In addition, several of us responded to the tree questionnaire to state that we felt it was important also to retain existing trees. We note that our comments are not reflected in the final report on this questionnaire.

In May 2023 we listed 18 principles (listed below and also [published in this blog](#)) that would be needed to develop a tree strategy. Looking at the current draft, we do not see any substantive proposals to address these principles, with only two of these issues mentioned in the current BCC draft but only in vague, aspirational terms.

We remain ready to help and collaborate but, at the moment, we are unable to endorse what is being proposed.

Bristol Tree Forum - 18 Principles for a Bristol Tree Strategy

- 1. Buy in from all the stakeholders involved.** Many council departments (as well as Parks, there is Highways, Education and Planning) have a role to play in the management of Bristol's trees. We need to see evidence that all such departments are fully involved in the development of the strategy. In particular, with the current review of the Local Plan, it is essential that Planning is fully engaged with the strategy, and that the two documents are consistent and properly cross-referenced. The tree strategy needs to be incorporated into the new Local Plan. In addition, other important landowners (such as the universities, utilities providers, housing associations, schools and hospitals) have a role to play in contributing their expertise to the strategy and implementing its goals. As well as the Bristol Tree Forum, many community groups have an interest in tree planting in Bristol and should be involved and consulted.
- 2. When council trees are removed, they must be replaced.** At present there are more than 800 street tree stumps and empty tree pits around the city - sites where trees once grew. A plan to plant all these missing trees within five years needs to be

¹ See the Summary in <https://democracy.bristol.gov.uk/documents/s86886/10.%20Scrutiny%20Report%20-%20Draft%20Tree%20and%20Woodland%20Strategy.pdf>



included. In the future, when any council trees are damaged or felled, they should be replaced within the next planting season.

3. **There needs to be community engagement in tree management decisions** both at the level of individual trees and in strategic decisions. In recent years we have seen a rise in community led campaigns to protect trees, such as the Ashley Down Oak, the M32 maples and Baltic Wharf, and this is indicative of a disconnect between the Council and the communities it serves. When the balance of the Environment Act 2021 takes effect later this year, Councils will be obliged to consult when street trees are being considered for removal². This is too narrow and should be extended to include where any public tree is being considered for removal. Therefore, part of the strategy should be promoting community engagement, providing mechanisms for engagement and then taking account of the concerns of the community and tree campaigners alike.
4. **There should be one person responsible for trees within Bristol City Council.** At present we have tree planning officers, tree maintenance officers and tree planting officers with no single individual or office accountable overall, often resulting in a lack of appropriate action or people working at cross-purpose. It is also concerning that Highways are able to remove street trees without any consultation.
5. **There needs to be a plan to address the massive inequality in tree cover in Bristol,** which often mirrors social and financial deprivation in the City. For instance, additional protections could be given to trees, and tree planting prioritised, especially in deprived areas such as the City Centre, Harbourside and St Pauls.
6. **When developers remove trees, the replacements required should be planted by BCC.** Too often developers have shown themselves incompetent or unconcerned when planting trees, so the trees fail or are never planted. In the case of Metrobus, there has been a more than 100% failure rate of trees in some places (trees have been replaced multiple times). We have an excellent tree planting team in Bristol and we should benefit from requiring them to organise and implement the planting required. The cost should be funded by the developer.
7. **Retaining existing trees must be a major part of the strategy.** A tree strategy cannot be just about planting new trees, the benefits of which will not be realised for decades, but crucially about retaining and protecting existing trees and the benefits they are already providing. As such, the strategy must address the threats to existing trees. Planning is crucial in this so we would expect major engagement with Development officers to address the current and future problems.
8. **Planning Enforcement must address the illegal removal of or damage to trees.** At the moment there are no consequences following the unauthorised damage or destruction of trees. This must change. Other neighbouring local authorities manage to do this but not Bristol. A strategy must include a review of the reasons for the

² <https://www.legislation.gov.uk/ukpga/2021/30/part/6/crossheading/tree-felling-and-planting/enacted>



existing lack of effective enforcement and make recommendations as to how this can be rectified.

9. **Developments should be built around existing trees** as is already required³. Other local authorities do this but not Bristol. This will require a change of culture in the planning department so that pre-application discussions with developers make it clear that this will be required.
10. **The sites for the replacement trees must be agreed** before Planning Applications are approved. This is required by planning policy (BCS9 and DM17), but currently developers are being allowed to, instead, pay a “fee” into Section 106, and frequently the replacement trees are never planted. Trees form an important part of our urban habitat. The calculation of tree replacements required to compensate for their loss must be aligned with the Biodiversity Metric as adopted under the Environment Act 2021.
11. **Spend the £ 900K+ reserved for tree planting.** Connected with the above point, a strategy needs to include a mechanism for spending the existing £900K+ of unspent tree planting Section 106 money within the next three years.
12. **A strategy to increase Bristol’s tree canopy cover** (or at the minimum, maintain existing canopy cover) needs to have a route to implementation. This must include addressing the loss of street tree canopy cover by being bolder in selecting new tree planting sites and planting large-form trees wherever possible. Trees such as rowans and flowering cherries are short-lived and will never provide much canopy or become robust enough to survive our challenging urban environment in the long-term.
13. **Canopy Cover needs to be [measured with an agreed methodology](#)** with confidence limits (levels of doubt in the estimate) made clear. In the first instance, we need to establish the baseline year and percentage tree cover from which progress will be measured. Only then will it be possible to show whether a trend has been determined. Two measurements using different methodologies should not be used to claim an increase in canopy cover. The metric should take account of trees lost so that the figure reflects the true increase, or loss.
14. **Include trees within road changes.** There needs to be proper engagement with Highways at early stages of the design process for road changes to look at retaining the maximum number of existing trees and including innovative planting opportunities for new large-form trees, such as pavement build-outs.
15. **For new developments, trees should be properly considered at the pre-application stage**, with appropriate consultation with stakeholder groups. Too often, the mitigation hierarchy requiring the removal of trees to be a last resort is disregarded,

³ Bristol Core Strategy, policy BCS9 states that, “Individual green assets should be retained wherever possible and integrated into new Developments.”



so that it is only after the design has been finalised that the existing trees are considered and removed where they conflict with the design scheme.

16. **Biodiversity Net Gain (BNG) calculations need to be checked by the Local Planning Authority and biodiversity loss must not be monetised as BTRS has been.** BNG, if properly implemented, makes sure that biodiversity on development sites is properly measured and will provide a net gain (soon to be least 10%) is factored in. However, at present, developers' calculations are not being checked. When we have provided properly evidenced calculations, these have been dismissed by the LPA as mere differences of opinion. You cannot have differences of opinion on facts. The LPA must require that BNG calculations are presented in a way that can be checked by anyone interested and actually do the checking. In addition, ensuring BNG must require that the development site does not lose its biodiversity. If this is not possible, then its immediate local environment must be used to offset any onsite losses. Onsite losses must not be compensated for in some faraway place completely removed from Bristol.
17. **Planning Applications involving trees must mention this fact in the title.** Too often, applications that [involve the loss of important trees](#) (or plans to avoid the planting of new trees⁴) do not even mention this fact in the title. This means that it is extremely difficult for community organisations to engage.
18. **Once a planning application has been issued, no removal of trees.** A moratorium should be placed on any tree felling pending the outcome of the planning application. This includes applications to demolish buildings which should exclude tree or other habitat removal.

⁴ See the Avon Crescent Application pp136 - 155 <https://democracy.bristol.gov.uk/documents/g10675/Public%20reports%20pack%2010th-May-2023%2014.00%20Development%20Control%20B%20Committee.pdf?T=10>

STATEMENT 5 – HELOISE BALME

I would like to submit a statement to the Communities Scrutiny Committee, ahead of the planned meeting on 14th Sept at 17.00.

I write with reference to the draft Food Growing Strategy, which forms part of the new Parks and Green Spaces Strategy.

Alignment of the PGSS/Food Growing Strategy with Bristol Good Food 2030

Bristol Food Network, with the support of Bristol City Council, has developed and coordinates the Bristol Good Food 2030 Partnership, who have collectively developed the [Bristol Good Food 2030 - A One City Framework for Action](#). This framework lays out a set of pathways for Urban Growing in Bristol, both in communities and commercially, to help the city develop food resilience in the face of the climate and ecological emergencies.

It is surprising that the BGF2030 Framework for Action is not mentioned in the papers for this meeting, as there has been close cooperation with BCC, in particular the Smallholdings and Allotments team, on work to map potential growing land and to discuss the principles that should be considered for allocating and protecting land to optimise growing in the coming years.

We hope that the draft Food Growing strategy that is published for consultation will align with the goals and principles set out in the BGF3030 Framework for Action (p. 64 onwards).

Whilst it is reassuring to read in the [meeting papers](#) that increasing land allocated to growing, and supporting more community-based/collective growing will be part of the draft Food Growing Strategy, there is no explicit intention set out for supporting increased commercial growing in the city on council-owned land. The statement under 'repurposing land' on p. 11 could be read as favouring allotments over commercial (smallholding) growing. A more balanced statement to take account of both allotment and commercial growing needs would be welcomed.

Increasing available land for commercial growing is a key strand of the BGF2030 Framework for Action and is crucial to Bristol's food system becoming more resilient. Increased individual and community growing alone will not enable the One City Plan goal of '15% of all fruit and veg for the city produced in city-region by 2040' to be met. It is vital that support for increased commercial growing is put into place for the city to better feed itself, and the starting point for that has to be more access to land. Bristol Food Producers holds a list of professional growers who are actively seeking land to grow within the city.

I hope you will find this feedback useful to your discussion at the meeting. Please do not hesitate to contact me with any follow up queries.

The BGF2030 Partnership looks forward to reading the draft strategy.
best wishes,
Heloise Balme, Bristol Good Food