

## **Draft Green Space Strategy Consultation**

Public consultation on the proposed Green Space Strategy took place over four weeks commencing on Friday 21<sup>st</sup> November 2006 with responses required by 4.30 pm on Friday 22<sup>nd</sup> December.

During this time the consultation documents and details on how to make a response were available at Council Offices in Bath (Trimbridge House), Keynsham (Riverside) and Norton Radstock (The Hollies). The documents were also available at Bath Central, Saltford and Radstock libraries and on the Bath and North East Somerset Council website. The start of the consultation was highlighted by a widely distributed press release, a news item on the Council's web site homepage and in 'Inform', the Council's electronic newsletter that goes to all staff and general subscribers.

To raise awareness of the draft strategy and invite comments from interested parties, over 200 organisations and stakeholders from the Planning Services database were advised of the consultation period, along with all Councillors and groups that had taken part in earlier consultation on the development of the strategy.

A presentation on the draft Green Space Strategy was given by Council Officers to the Parish Liaison Meeting in October 2006, prior to the consultation period. This was then followed up by contact with each Town and Parish Council within the District advising them of the consultation period and inviting responses.

Representations were received from 13 organisations or 'stakeholders' and these are set out below together with the Council's responses.

GREEN SPACE STRATEGY CONSULTATION – EXTERNAL RESPONSES							
ID	Organisation	Contact	Support	Object	Part of Strategy	Comment	Council Response
1		R Wallace, 16 HIGHFIELDS, RADSTOCK SOMERSET, RICHA9999@AOL.COM		Y		Strongly object to the removal of the Amenity/Visually Important designation from the hillsides around Radstock/Midsomer Norton	This comment relates to the Bath & North East Somerset Local Plan proposed Modifications and has been forwarded to Planning Services.
2	Forest of Avon	Jon Clark, Ashton Court Visitor Centre, Long Ashton, Bristol Post Code BS41 9JN Daytime Tel. No. (0117) 953 2141. Fax. No. (0117) 953 2143 E-Mail jon.clark@forestofavon.org.uk		Y	Paragraph No(s) 2.1, p6 - Natural Greenspace in Rural Areas. – Contributing to the Strategy; Appendix F, p11	2.1, p6. - Assumption made about there being physical access to the natural environment in rural parishes. This is not necessarily the case. Not all parishes have public rights of way and where they do exist these only provide linear and short duration access to the natural environment. It also assumes public rights of way are in good condition. The Forest of Avon with partners have produced a Green Infrastructure study for the West of England which identifies deficits in GI provision including public access. We could apply this methodology to help Bath and North East Somerset Council quantify deficits in this provision. Appendix F, p11. It may be appropriate to consider the role of investment in the public rights of way network to provide meaningful access to natural greenspace for rural communities.	Noted. Comments passed to the Officers dealing with the Council's Rights of Way Improvement Plan.
						I welcome the inclusion of investment in the natural environment in rural areas to secure/ improve access to woodland areas, commons and/or areas of biodiversity. Outside the AONBs, all of BandNES is now within the Forest of Avon, which has a dedicated project team. The Forest of Avon could provide capacity to help the Council and communities to realise their aspirations for new access and new access to the natural environment and Planning Guidance has been produced in the last year setting out how this might be achieved. 11.4, p126, Recommendations 33 and 34. I welcome both of these and would suggest that the Forest of Avon team should be referred to and called upon to assist with this process.	Noted.
						Ref 1.2, p129. I would welcome inclusion of the Forest of Avon, supported by Bath and North East Somerset Council, in this SPD. This is something, which should reinforce the delivery of the Green Space Strategy.	Noted.
						Ref 1.5, p131. I support reference to the Tree and Woodland Strategy. I would suggest that the Forest of Avon is included within the group to produce this.	Noted. Action point amended accordingly.

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						Ref 4, p134. I feel that the Forest of Avon team could assist partners in achieving some of its community consultation objectives and could support the engagement of communities in their local greenspace through its WoodSchool and other projects.	Noted.
3	Woodland Trust	Justin Milward, Jayrise, Butcombe, BRISTOL BS40 7UT		Y	Section 2 – Classification of Green Space; Appendix E – Policy Review Paragraph(s)	<p>The Woodland Trust’s Space for People research and report can contribute specifically to the area of publicly accessible woodland in BANES.</p> <p>We are pleased to see this consultation on BANES’ Green Spaces Strategy but are objecting because we believe that the Woodland Trust’s <i>Space for People</i> research and report can contribute specifically to the area of publicly accessible woodland in BANES.</p> <p>There is growing awareness of the linkage between healthy communities and the quality of the environment. Hospital recovery rates for example, show significantly faster recovery where patients had a view of trees and woodland from their hospital window (Ulrich, R.S. 1984, “View Through a Window May Influence Recovery from Surgery”, ‘Science Journal’ 224, pp.420-421). The National Urban Forestry Unit’s report ‘Trees Matter’ provides an excellent summary of the benefits of trees and woods in towns and cities. It notes the role of stress as a highly significant factor in the health of urban Britain and points to the “ample anecdotal evidence that people feel better in green, leafy surroundings and many seek solace amongst trees and woodland...Urban residents suffering from stress have been known to experience less anger, sadness and insecurity when viewing well treed surroundings as opposed to landscapes devoid of greenery” (National Urban Forestry Unit (1998) ‘Trees Matter; the benefits of trees and woods in towns’, p.6).</p> <p>Numerous studies on greenspace and particularly woodland have shown that they are highly valued by communities (MORI, 2002, The Environment: Who cares?), and that access to woodland is not only important for health benefits through exercise but also makes visitors feel ‘happy’, ‘relaxed’ and ‘close to nature’ (Coles R.W. and Bussey S.C. 2000, Urban forest</p>	Comments Noted. Much of the content is directly relevant to a Tree & Woodland Strategy, the consideration of which is an action point (1.6) within the Strategy. These points will be fully considered whilst undertaking this action.

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						<p>landscapes in the UK - progressing the social agenda. Landscape and Urban Planning 52, pp181- 8).</p> <p>Nature is able to improve the quality of people's lives and we believe everyone should experience it and have easy access to it. The need for this has been recognised by Government, indeed Margaret Beckett's has stated that: 'locally, everyone has the right to the cleaner, greener, safer neighbourhoods which improve their quality of life' (Speech to Labour Conference, Brighton, Sept 26<sup>th</sup> 2004).</p> <p>Access to woodland and other semi-natural greenspace in the wider countryside can also be limited. It is just as important to facilitate people's interaction with and access to the natural world in rural areas as it is in our towns and cities. Proximity and access to woodland is a key issue linking the environment and health. Recognising this, the Woodland Trust has researched and developed a <b>Woodland Access Standard</b> for local authorities to aim for. This standard is endorsed by English Nature.</p> <p>The Woodland Trust Woodland Access Standard recommends :-</p> <ol style="list-style-type: none"> <li>1) that no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size;</li> <li>2) that there should <u>also</u> be at least one area of accessible woodland of no less than 20ha within 4km (8km round-trip) of people's homes.</li> </ol> <p>This translates into the BANES area as set out below, with a comparison against the whole South West region. As the data has been collected in GIS form, we are able to supply this information both in map and in numerical form.</p> <p><u>Accessibility to Woodland in using the Woodland Trust Woodland Access Standard – see Table in Appendix 1</u></p> <p>We would therefore like to see accessible woodland supported as part of BANES' Green Spaces Strategy. 'Space for People' is the first UK-wide assessment of any form of greenspace and, while the targets may seem challenging, they represent the result of detailed analysis.</p>	

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						The 'Space for People' report can be found at <a href="http://www.woodland-trust.org.uk/publications">www.woodland-trust.org.uk/publications</a> .	
4	Bath Friends of the Earth	Scott Morrison, 7 St. Catherine's Close, Bath, BA2 6BS tel 01225 463555 email info@scottstudio.co.uk		Y	2. Classification of Green Space	Bath FoE are pleased with much of the Green Space Strategy but feel the recommendations overlook green corridors which have significant benefits for biodiversity, wildlife and non-carbon based transport. Green corridors are more difficult to analyse with tables and maps because they cut across ward boundaries. This characteristic adds to their significance. The river and canal are two of Bath's most obvious green corridors but they do not appear in the strategy's recommendations. Development in Bath will affect these corridors and so awareness should be raised by highlighting green corridors as a separate category/type. FoE would welcome the appointment of a green corridors councillor champion as they extend beyond ward boundaries. Ex-rail corridors provide opportunities for wildlife, recreation and commuting. Norton Radstock development is threatening the 'wilderness' character of parts of these corridors. In Bath the linear way over Lower Bristol Rd needs to be linked into cycle and pedestrian routes through Western Riverside.	Comments noted. However, it is not considered that the Strategy overlooks the various benefits or qualities of green corridors. They have been identified in the Strategy and are afforded the same protection as other types of green space.  A separate land type for green corridors is not considered necessary. The flexibility built into the chosen typology will enable the effective provision and management of the diverse range of green spaces.
5		Jon Lucas, 1 Coronation Avenue, Oldfield Park, Bath BA2 2JT		Y	Appendix B	In the quality audit criteria, Access & Circulation deals mostly with car borne visitors. The Council's priority should be in attracting visitors by more sustainable means. It misses out, e.g. how accessible each facility is by foot and whether there is cycle parking available and proximity to bus stops.	Disagree. Equal emphasis was given in the quality audit to all modes of access and circulation, although it is accepted that this is not explicit on the audit form used.
					Chapter 12 action point 1.7	Concerned about general tone in document concentrating resources in some larger facilities and possibly removing some small local facilities (e.g. Action Plan 1.7)	Noted.
			Y			Welcome the GSS as a means of going forward.	
6	B&NES Allotments Association	Jon Lucas, 1 Coronation Avenue, Oldfield Park, Bath BA2 2JT	Y		11.1.1	Support recs 1 to 5 but wish to see additional recommendation. The GSS states 'As previously identified only accessible open space was mapped and analysed.....' Rec 1 refers to the need to 'identify and map opportunity sites.' There are several active private allotment sites (presumably classified as inaccessible) in Bath which have no statutory security and are subject to	

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						developer attention. These are not identified in the GSS. There are also a number of unused sites esp. in Bath that were previously used as allotments but have been allowed to become derelict and are likely to attract attention from developers. Unfortunate that the GSS does not take the opportunity to identify these sites. We feel this is a matter of urgency, given the identified shortfall in allotment provision and the many instances of attempts to develop the sites for other uses. This should be addressed in Recommendation 1 or a new Recommendation.	
					11.1.2	Support Recs 6 to 8	
					11.1.4	Support Recs 18 to 20. Rec 18 should also note suggested additional Rec under 11.1.1 above.	
					11.2.1	Support Recs 21 & 22 but question some choice of quality standards used in the GSS. The criteria chosen for allotments has led to a strange ranking of allotments in table 4.2.1.1 p20, where some popular allotments are ranked poorly compared with others with more perceived problems.	
					11.2.5	Support Rec 24	
					11.4.12	Support Recs 33 to 37. There is much scope for greater community participation in managing allotments and increasing their provision (as referred to in action 3.4).	
					Action Plans 1.2, 1.3 and 1.16	Support but there needs to be a proactive policy of investigating suppressed demand for allotments.  Support the idea of generating funds from development for increasing allotment provision but wish to see allotment standard increased.  Support Action 1.16 and consider annual review of strategy's progress essential.	
				Y	11.1.1	Object to allotments standard of 3 sq m / person. This would improve existing situation but still too low given demonstrable demand. Estimate that standard is equivalent to one full size plot per 50 households and that current supply is one half size plot per 28 households.	It is recognised that there is a statutory duty for the relevant Councils to meet demand for allotments in their area. The proposed 3 sqm/person standard exceeds current known demand.

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						<p>Factors that should be taken into account:</p> <ol style="list-style-type: none"> <li>1. Large &amp; growing waiting list;</li> <li>2. Great disparity across district – likely to lead to considerable suppressed demand as many people will have been put off from applying for an allotment due to waiting lists and lack of sites close to home.</li> </ol> <p>Recent small survey in Oldfield Park – we found there were many more households interested in taking an allotment or already had one, than the proposed standard would allow for especially an allotment close to home. Historically, in 1952, the peak year for allotment provision in Bath, there were allotments for about 1 in 6 households.</p> <p>Therefore, suspect the real demand for allotments, including suppressed demand, is much higher than the proposed standard.</p>	<p>The Strategy recognises that actual demand (including latent demand) is difficult to estimate and will fluctuate from time to time.</p> <p>The allotment quantity standard along with all other factors will reviewed annually as set out in Action 1.17.</p>
						Comparison made in GSS (p37) with some other Councils' green space provision showing B&NES being relatively low. No specific comparison on allotment provision which is considered essential information.	Comparisons were made regarding allotments provision in other Local Authority areas in the research for the Strategy.
						<p>New recommendation required:</p> <p>'Sites that have been previously used as allotments or are currently used but have no statutory protection should be identified urgently and given protection by the Council from development until the identified shortfall in allotment provision is made good'.</p>	Noted. Identification of 'opportunity sites' will be carried out as part of work on Action 1.2 and this will include allotments.
					11.1.3	Although allotments have been excluded from the 4 District hierarchies, it is uncertain whether the local level provision recommendations would be applied to allotments. If so, concerned that it will be impossible to protect any site below the minimum standard size and will encourage development of small sites for other uses (Rec 16).	The hierarchy applies to 'formal' and 'natural' types of green space to differentiate between the range of facilities. This does not apply to allotments.
						Concerned the GSS uses a min site size of 1500 sq m (10 half size plots) as there are currently a number of privately owned smaller and disused sites that are smaller than this. Consider smaller sites are viable if Council has a proactive policy of involving community in management of sites as elsewhere in the country.	This has been included in Appendix F in relation to the provision of <u>new sites</u> through the development process. This does not preclude consideration of smaller sites.

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						Would not support policy that rules out community involvement of managing small sites.	Noted.
					11.1.4	Rec 19 should address suppressed demand for allotments as stated under 11.1.1 above as follows: ' A measure of demand must include both those that have applied for allotments and others who wish to have them but do not apply due to a variety of factors such as not having allotment provision nearby, or there being too long a waiting list, or ignorance that they may apply'.	Noted.
						Missing points in GSS: <ol style="list-style-type: none"> <li>1. No recognition of soil types and that allotment provision cannot be made on all types of land.</li> <li>2. Use of 450 m distance threshold does not recognise many local characteristics that make this inappropriate e.g. nature of route – actual greater distance because of road/footpath route, barriers (roads), steep hills.</li> <li>3. No recognition of value of tranquillity on allotments or other green spaces in quality standards.</li> </ol>	This will be addressed under Action 1.5  Standard set is 600m distance threshold. A 450m straight line threshold takes into account a range of characteristics of the route to allotments e.g. physical barriers.  Not specifically measured in audit but is recognised as a valid factor for various types of green space and contributes to a number of the factors that were measured.
7	Natural England	Gwilym Wren, Gwilym.Wren@naturalengland.org.uk			General comments	NE hopes that the developing work regarding Green Infrastructure in the West of England will contribute to the strategy methods, aims and objectives.	Noted
						We would be grateful if you could confirm whether, and how, BaNES has screened this strategy for implications under the Strategic Environmental Assessment Regulations, especially if the Green Spaces Strategy comprises or has links to the Local Development Framework.	The strategy has not been screened for implications under the SEA Regulations. Any elements of the strategy taken forward into the LDF will be subject to Assessment under that process.
						Green space contributes to the favourable condition of the Bath and Bradford on Avon Special Area of Conservation. The GSS may be subject to the Habitat Regs as areas are used by Horseshoe and Bechstein's bats.	This will be pursued with the Council's Ecology Officer.
8	South Stoke Parish Council	Robert Hellard, Chair, email: Robert Hellard [packhorsecott@tiscali.co.uk]		Y	General comment	South Stoke has only a very small area of Public Open Space so is little affected by this review. However the Parish Council does believe that the preservation of such spaces within the City of Bath is of fundamental importance to City Residents and the Rural Environs.	Noted.



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						Your new Green Space strategy should consider carefully before allowing removal of such spaces as the old Hayesfield School playing field. Once built on they can never be restored as a facility for Residents. The inevitable consequence is that pressure will grow to create new playing fields in the Green Belt. This would be quite unacceptable to the Villages around Bath and would ruin the Rural Environment, which is so important to City and Country dwellers alike.	
9	Widcombe Association	Sarah Lewis, Walden, Widcombe Hill, Bath, BA2 6ED. 01225 315491 sarahlewis@btinternet.com			General	The Widcombe Association is the largest Residents' Association in Bath with around 600 members. We are concerned that the Green Spaces Strategy was developed without consultation with Residents' groups in Bath, which does not have the benefit of Parish Councils. We think that there are very important basic errors in both the mapping of 'natural green spaces' generally, and in putting disused cemeteries in this category.	Noted - see responses below.
					Para 2.1	<p>We object to including 'a limited number of burial grounds' under 'natural' spaces. The text says that these are often linked to the promotion of wildlife conservation and biodiversity. This perhaps reflects the lack of appropriate maintenance, rather than a well planned strategy. To take a Widcombe example, it would have been more appropriate for the Abbey Cemetery, if it were planned to become a 'natural green space' rather than a formal one, to be given maintenance to encourage a wildflower meadow. This would have been more commensurate with caring for its historic heritage of monuments than the absolutely minimal maintenance it has received which has encouraged brambles and saplings which are so damaging to the monuments.</p> <p>It does not seem to be appreciated that the Abbey Cemetery is on English Heritage's Grade 2 list of Parks, Gardens and Cemeteries, one of originally only 30, now augmented to 80, in the country. The chapel is listed Grade 2 and the cemetery contains numerous important monuments. It is the best surviving and most picturesque cemetery designed by Loudon (opened in 1844) and was one of the earliest custom built cemeteries laid out on scientific lines. It is quite unacceptable that a site of national importance such as this should be thought of as a 'natural space' and considered with stretches of disused</p>	<p>Burial grounds cannot fulfil the typical functions of 'Formal' spaces as defined in the Strategy and there would be a danger if they were identified as such of attracting inappropriate uses. The inclusion of a limited number of burial grounds under the 'Natural' type of green space is intended to most closely represent the sort of experience that would be enjoyed by visitors to the space.</p> <p>The inherent flexibility built into the Strategy's typology will ensure appropriate management of each space.</p>

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						railway line. Amendment sought: Either include cemeteries in parks and gardens or create a separate category.	
					Map 4.1	We think that access to significant numbers of rural footpaths needs to be seen as provision of natural green space . It is quite bizarre that it can be stated that the majority of Bathwick lacks provision of natural green space when there are footpaths crisscrossing the fields all around (eg around Smallcombe). This suggests that the map used on which the conclusions and policies are largely based is not accurately reflecting the reality of the actual use of the land. There are many green spaces where people have roamed freely and picnicked for generations that are not on your map, which makes rather a mockery of it. It gives the impression that those who produced this map, which is basic to the entire document, do not know Bath, and that is why it is very important that the Residents' Associations should be consulted. We also object to the designation of cemeteries as natural green spaces (see above 2.1). Amendment sought: Redraw map to show fields with lots of footpaths, especially those where one is effectively free to roam. Also do not categorise cemeteries as natural green space.	All potential areas of open access identified by the Council were investigated for inclusion in the Strategy. However, where landowners were unable to confirm an agreement for formal public access, such areas have been omitted.  Actions 1.2 and 1.17 will address the mapping of additional areas of green space.
					5.2	Quality of natural green spaces. These criteria are not suitable for analysing the conflicting requirements of managing disused cemeteries. Amendment sought – Categorise cemeteries separately	The quality assessments are 'broad brush'. Disagree that cemeteries require a separate category. Action 3.1 will provide for much more site specific and detailed information in Management Plans and regular reviews.
					11.1.1	Quantity and distribution of natural green space in Bath – This draws wrong conclusions due to inappropriate mapping. Amendment Sought :Redraw map (see above under Map 4.1 and 2.1)	Disagree.
					11.4	It is claimed that 'The market research and consultation that lead (sic) to the development of this strategy was	Parish Council's were approached about their perception of green space facilities in rural areas

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						<p>excellent' but no Residents associations in Bath were consulted, though Parish Councils outside Bath were. The groups consulted are listed in Appendix D. In effect this means that Bath residents had far less consultation.</p> <p>Amendment sought: add that Bath, having no parishes, should be consulted in future via the Residents Associations. These should be listed by name in the Appendix.</p>	<p>as the District Council did not have access to this information whereas its research provided sufficient information for the urban areas.</p> <p>Future consultation is dealt with in the Strategy Recommendations 33 and 34 which feed through into Actions 4.1 and 4.2.</p>
					Appendix B	<p>This is the audit form for Natural spaces, and this is not appropriate for cemeteries. For instance 'is a wildlife focused management plan in place?' is asked, but not 'is a monument / built heritage maintenance plan in place? Are the monuments free of sapling growth? Can you find the graves?' etc.</p> <p>In Widcombe both the Abbey Cemetery and St James' have been included as Natural Spaces. The Abbey Cemetery has an absolutely fabulous site, so lots of quality boxes can be ticked on the audit form, but the score would not reflect the neglect of the site's primary purpose as a listed cemetery. The management of the cemetery has been such to constitute gross neglect of the monuments. In the case of St James' the site just looks neglected and down at heel. It is not a 'natural green space' by any stretch of the imagination.</p> <p>Amendment sought: A separate category for cemeteries, or include as a park.</p>	<p>The quality audits are only an indicative analysis. Detailed work on Management Plans will identify particular issues of quality in relation to individual sites (Action 3.1).</p>
					Appendix D	<p>Contains no mention of the Residents Associations that should be consulted in Bath, in lieu of the fact that Bath has no parish councils.</p> <p>Amendment sought ; All Bath RAs should be listed by name and consulted.</p>	<p>Parish Council's were approached about their perception of green space facilities in rural areas as the District Council did not have access to this information whereas its research provided sufficient information for the urban areas.</p> <p>Future consultation is dealt with in the Strategy Recommendations 33 and 34 which feed through into Actions 4.1 and 4.2.</p>
					Appendix E 2.2.14	<p>It is stated: 'This document is a useful reference with regard to the development of the Green Space Strategy. It provides practical advice about improving green spaces for biodiversity and is of direct relevance if Bath and North</p>	<p>Action 3.1 – the involvement of specialist groups and local communities will help ensure appropriate Management Plans.</p>

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						<p>East Somerset Council were to consider changing the primary purpose of any green spaces towards more semi natural provision.'</p> <p>The primary purpose of any green space will depend on the space itself.</p> <p>We find the quoted section worrying with regard to maintenance, as we suspect this is what it is about. More semi natural provision of a wildflower habitat might call for more maintenance, rather than less. We do not suspect that this is what the council has in mind. In Widcombe our experience of maintenance of the Abbey Cemetery is that the council hides behind the façade of promoting wildlife habitats, whereas it should be questioning what it is about the site that is important – and in this case it is the fact that it is listed Grade 2 by English Heritage as an important Park, Garden or Cemetery.</p> <p>There may well be possibilities for semi natural provision within a disused cemetery, but there are other issues about such areas that need to be confronted, and lumping them in with any green space is not helpful.</p> <p>We note that the National Trust are permitting scrub to develop ( on the border of Widcombe and Claverton Down) because it is too expensive to provide management of grassland and associated flora, which would be more appropriate. Maintenance would historically be provided by grazing and instead would require a careful mowing regime. For all its talk of biodiversity the council does not appear to be encouraging this. Whole swathes of such rich habitats are disappearing and possibilities of their restoration are being missed, as the council remains obsessed by trees. The grazed fields surrounding Bath are part of its heritage. They should be given more consideration. Increasing semi natural provision must not be seen as a cost cutting option.</p> <p>Amendment sought: Separate category for Cemeteries                      Acknowledgement that promoting some semi natural habitats (especially wildflower meadows which are particularly at risk) may require more expensive maintenance strategies, but these should be encouraged.                      The council should support measures to reinstate or</p>	

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						<p>maintain historic habitats.</p> <p>Acknowledgement that providing more semi natural provision should not be seen as a cost cutting exercise. The council should support measures to reinstate or maintain historic habitats, particularly formerly grazed areas.</p>	
					Appendix E 3.2.4 Forest Plan	<p>This whole section seems to assume that trees are necessarily good in terms of landscape, heritage and biodiversity. This needs to be examined critically.</p> <p>In Bath it is very worrying that vistas - for instance of Prior Park from Widcombe Manor and views of the Palladian Bridge, are disappearing. These are part of the delight of Bath, These vistas are part of its historic design, and they are under threat due to indiscriminate tree planting.</p> <p>We are seeing change in the historic landscape and habitats on the plateau top at Calverton Down through planting of hedgerows etc. The plateau tops were areas of big open spaces, grassland (and flowers , larks etc) and of long views. Now this is changing and the NT allow scrub to develop as management for wildflowers is too expensive. Should the change in the historic landscape and loss of habitat in these areas not be considered important too? Perhaps a higher priority should be given to habitat maintenance through grants, rather than for capital projects such as tree planting.</p> <p>Anyone reading this section would be forgiven for thinking that for the council, biodiversity equated to planting trees. It implies that establishing woodland is important for people to be able to enjoy the countryside. We think this too must be questioned. Again taking an example from Widcombe, the footpath across from the University to Combe Down is used by many people as a route to work, university and school, in the winter often in poor light. The planting of trees close to this path and a hedgerow next to it raises concerns of safety.</p> <p>More importantly perhaps in terms of getting people out to</p>	Noted. Action 1.6 relates to a Tree & Woodland Strategy when all such issues will be closely considered.

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						<p>enjoy the countryside through walking the footpaths, are the views one can enjoy en route. Often the views might be the spur for the walk: to enjoy the view from the top of a hill, from the Skyline Walk or from Lansdown Cemetery. On a recent walk to the top of a hill in Weston the enjoyment of the view was tempered by the realisation that in a few years nobody would be able to enjoy it so easily as lots of trees had been planted in the way, very carefully and deliberately and one suspects with a big grant. All this on beautiful farmland - in no way a damaged site in need of reclamation.</p> <p>It would be bizarre if the council were to fund tree plantings that were resented by the residents because they obscured views and vistas. Amendments sought</p> <p>Tree planting should not be encouraged where views and vistas enjoyed by walkers and residents will be impaired, and which will obscure sight lines of landmarks that are important and desirable features in the landscape.</p> <p>Tree planting should not be encouraged to the detriment of safety (eg adjacent to footpaths used as commuter routes at dusk)</p>	
					Appendix F	<p>This section deals with how the costs of providing for increased green spaces could be passed on to a developer. The map of existing green space provision would therefore become an important document. We maintain that it does not accurately reflect what is on the ground – for instance in the Smallcombe Area. Amendment sought – Revise map</p>	
					Appendix F appendix 2.2b	<p>We note that the quoted costs of maintenance for formal green spaces is £55.03 sqm and of natural green spaces £15.55 sqm. I suspect this reflects the lamentable state of maintenance of disused cemeteries. It is completely unrealistic to expect to be able to satisfactorily maintain a disused cemetery for the same sort of sums as a disused railway line or woodland. The neglect of such an important cemetery as the Abbey Cemetery is shameful. And a cemetery such as St James' obviously needs a radical rethink about how it could be redesigned to be a</p>	<p>Figures in Appendix F reflect the costs of setting up and maintaining new facilities and relate to Planning Obligations for green space when developers are seeking planning permission for new development.</p> <p>Disagree that a separate category is required for cemeteries as indicated above.</p>

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						<p>real asset to the community, and also perhaps to provide some possibilities for wildlife, including wildflowers and perhaps an orchard. It could be a really exciting project. But it is not appropriate that they should be included as natural green space, especially with the unrealistic maintenance costs that implies.</p> <p>Amendment sought: A separate category for Cemeteries, or include with gardens and parks.</p>	
10	Wansdyke Bridleways & Byways Association	S. Kibble, 30 Queens Road, Keynsham, Bristol, BS31 2NH. 0117 9867217 skibble@tiscali.co.uk	Y		2.2.1 3.1.1 3.2.4 3.2.5 3.2.7 3.2.8	Where possible more access and safer multi use for horse riders should be created as there is very little provision at present. Most byways and BOATS are used by 4x4 and motorbikes and these users are not always considerate of horse riders. Vehicles damage track surfaces making it difficult for horses.	
11	London Road Area Residents Association	Ann Dunlop (for LoRARA Committee), Acacia Lodge, Kensington Place, Bath BA1 6AP				Documents provide very thorough assessment of the availability and variety of formal, natural and allotment provision in the local authority area.	
12	Cam Valley Wildlife Group	Deborah Porter, Conservation Officer deborah_whitelands@tiscali.co.uk				<p>1.1.0 TYPES OF OPEN SPACE COVERED WITHIN THE GREEN SPACES STRATEGY.</p> <p>1.1.1 The Green Spaces Strategy does not address the full gamete of 'open spaces' as laid out in PPG 17. The council has chosen to categorise green spaces according to its use by the public and excludes land to which the public is not granted unrestricted access, civic spaces and some burial grounds. The question is, should it? This depends on the function of the document, whether or not this function is covered either entirely or in part elsewhere and on the likelihood that any areas not covered will be covered adequately through other means (including whether these exercises have been timetabled in or are a requirement of the Strategy itself)</p> <p>1.1.2 The council lists specific benefits of the Strategy as including identifying deficiencies in supply, protection from development and enabling the provision of an appropriate level of facilities, in</p>	<p>The strategy is concerned with green spaces that are freely accessible to the public for recreation as defined in Section 2. (p3) Classification of Green Space.</p> <p>Burial grounds have only been included where they can fulfil the function of a recreation space.</p> <p>Noted</p>

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						<p>order to identify improvement needs and opportunities and to provide a management framework to owners of accessible space that will enable them to manage to the benefit of users. It quotes Alan Barber with reference to the importance of a comprehensive strategy in enabling progress towards improving green assets.</p>	
						<p>1.1.3 The Government requires that an effective strategy is worked up from good quality assessments and audits in respect of the matters regarding open spaces covered in PPG 17 and specifically sees it as a vital tool in the process of resolving potential conflicts between uses and users. It expects this strategy to include open spaces as wildlife and biodiversity resources and visual amenities and include wasteland and derelict land, accessible countryside in urban fringe areas, civic spaces, burial grounds and so on. It provides a typology, but does stress that Authorities may want to add to this typology according to their own particular circumstances. We assume from the reference to SPDs that this Strategy will form part of the LDF and note that PPS12 states that an SPD must be consistent with national and regional planning policies as well as policies in development plan documents.</p>	Noted
						<p>1.1.4 We feel that this Strategy needs to be more comprehensive in order to fulfill these requirements. We are of the view that the council has taken a limited view regarding what is covered in the Green Spaces Strategy so far. We believe that because there is no other adequate mechanism to properly assess, audit and provide a management framework for the most types of open space that are not covered in this consultation document, it will be necessary to include these types of land. We believe that it will be necessary to abandon the simplified</p>	Noted. However, it is felt that the typology used in the Strategy is both sufficiently comprehensive and flexible to address all types of accessible public recreation space. Other categories of open space will be considered within other proposed strategies e.g. Action 1.6 consideration of the preparation of a Tree & Woodland Strategy and Action 1.7 consideration of the preparation of a Landscape Strategy.



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						<p>typology in favour of one more like that recommended in the companion guide to PPG 17, and that one of the benefits of a more comprehensive approach now will be a more cohesive and workable LDF in the future.</p> <p>1.1.5 The types of land that appear not to have been taken into account include:</p> <ul style="list-style-type: none"> <li>• open spaces of visual importance (including to <i>“provide an outlook, variety in the urban scene, or as a positive element in the landscape”</i>, PPG 17);</li> <li>• wasteland and derelict land;</li> <li>• post-industrial sites;</li> <li>• Nature Reserves - there appear to be few included;</li> <li>• Woods and waterways - there appear to be virtually none listed;</li> <li>• pieces of land that are accessible to and used by the public through either a lack of restriction by landowners (a sort of informal access) or via use of public footpaths - we think that access via public footpaths is an important factor (see below);</li> <li>• SNCIs - we think that the Authority’s stock of SNCIs, whether accessible or not, should be listed and illustrated;</li> <li>• all areas presently designated as ‘important hillsides’ and ‘visually important open space’ in the local plan;</li> <li>• other spaces flagged up in Conservation Area documents.</li> </ul>	<p>These land types are outside of the scope of the Green Space Strategy but will form an important consideration of a Landscape Strategy, the consideration of which is set out as Action 1.7.</p> <p>Appropriate wasteland, derelict and post-industrial sites with potential as green spaces will be identified under Action 1.2 (as ‘opportunity sites’).</p> <p>Natural sites fully accessible to the public in urban areas are covered by the Strategy.</p> <p>Classification of sites goes beyond access via footpaths to include the ability to have unrestricted rights for a range of activities on the land. It is a pre-requisite that sites are fully accessible.</p> <p>Should be addressed in Action 1.7, consideration of the preparation of a Landscape Strategy.</p> <p>Action 1.2 may flag up additional sites.</p>

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						<p>1.1.6 We suggest a revision of the Framework Map, figure 2.2 and Appendix A. Resolution for the map in the pdf documents are poor, and although the location of the spaces are identified in tabular form, with hectarage, we feel it would be helpful if the boundaries of the sites were discernable on the maps.</p> <p>1.2.0 Landscape features and visually important spaces</p> <p>1.2.1 It seems to us that it is important to quantify and qualify the ‘stock’ of landscape features and visually important spaces and to assess their context in different locations (in accordance with the Government’s wishes) within the Strategy as there is no other place in which this is dealt with in this way.</p> <p>1.2.2 Many of these features, whilst not being official public access land, are accessed via public footpaths, allowing their use nonetheless, or are areas where the landowner allows or has no objection to public use. We think that access via public footpaths is an element that should not be overlooked when assessing access to greenspaces, and is certainly an area in which providing a management framework is much needed, including to help make landowners more aware of their obligations and the importance that the public and the council attaches to the resource. There is greater access to a larger number of people to land through which public footpaths run than there is to most allotment sites, which are generally restricted to allotment-holders only. Although footpaths will be covered elsewhere, we feel it is important to bear in mind the Government’s requirement that Strategies interlink. We feel that the Greenspaces Strategy can play an important role in promoting cohesion of strategies and policy.</p>	<p>Noted.</p> <p>Should be addressed in Action 1.7, consideration of the preparation of a Landscape Strategy.</p> <p>Addressed in a Rights of Way Improvement Plan.</p>

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						<p>1.2.3 PPG 17 stresses the importance of open spaces as visual amenities, stating that even without public access, people enjoy having open space near to them to provide an outlook, variety in the urban scene, or as a positive element in the landscape. The Local Plan includes targets and indicators relating to its key objectives as a basis for monitoring the Local Plan and to help inform when a review is needed and its timing (RDDLP A4.42). However, it only measures net loss of visually important spaces, not the quality of those spaces and not the net loss of 'important hillsides' or other landscape features. In addition, the Inspector's report on the RDDLP advocated removal of the visually important open space and important hillsides designations on the grounds that they are covered by policies elsewhere in the plan, so these may be lost following a Modifications Inquiry. We believe that the other policies in the plan are insufficient to protect them all. The landscape character assessments (Rural Landscapes SPG) essentially describe rather than assess in these contexts. The important features are not all mentioned, and the quality of features in their visual context is not adequately assessed (this is expanded in the accompanying document on policy NE.3 and associated text submitted recently to B&amp;NES by Somer Valley Friends of the Earth). Similarly, Conservation Area documents for Norton Radstock at least (we have not reviewed others) describe character, and although some features are described as important to a particular area, they are not comprehensively assessed.</p>	Noted. Should be addressed in new Action 1.7 consideration of the preparation of a Landscape Strategy.
						<p>1.2.4 The value or potential value of these features in terms of their importance to wildlife is not assessed in these documents and only some of them are designated as SNCIs, either because they have lesser value and do not qualify or</p>	Noted. Outside the remit of this Strategy. However, comments will be forwarded to the Assistant Director Planning & Transport Development.

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						<p>because there is insufficient data to make a determination, as is the case for much land in private ownership. The contribution that these features make to the ecological network, and their potential contribution to it, are not assessed or included in any strategy. PPG 17 describes the functions of open space as including as havens and habitats for flora and fauna, with the potential to be corridors or stepping stones from one habitat to another and as areas that may contribute towards achieving objectives set out in local biodiversity action plans. Such features clearly include those that have the potential for value whilst not being of value yet (for example land degraded ecologically due to modern agricultural practices and some derelict land or wasteland). However, these are not assessed in the Local Plan or elsewhere with regard to their potential or present role in the ecological network. The LBAP measures are restricted to the identifying the importance of areas that are part of the existing network in Development plans, developing and maintaining a biodiversity network of council-owned land, and targeting incentive schemes to key areas enhancing, buffering or linking existing sites or areas of wildlife importance, which will be mapped out. Local Plan policy NE.12 applies to landscape features regarding their value as a wildlife resource and for their amenity and landscape value. It is difficult to ensure that the policy offers sufficient protection for landscape features as components of an ecological network, however, without identification of that network and evaluation of features within it. Such a network is more than a collection of SNCIs, which can be isolated from one another when connection would be better (not that connection is always better!). In addition, NE.12 appears to protect only areas of <u>existing</u> value, not spaces of potential value. Whilst it is true that there is an element of the policy that seeks the creation of</p>	

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						<p>new features, without a Strategic framework within which potential elements of a network have been identified, there is no protection for features of potential importance to a network in particular.</p> <p>1.2.5 Clearly the LBAP and Local Plan need a complementary Strategy in order that PPG 17 can be taken properly into account. We feel that the Green Spaces Strategy is the appropriate place to identify these features as part of the wildlife resource and for amenity or landscape value, thus enabling the Strategy to better fulfil its role as a tool that combines with good planning policies to help resolve potential conflicts, as described in PPG 17.</p> <p>1.3.0 Wasteland, derelict land and post-industrial sites</p> <p>1.3.1 Wasteland and derelict land does not seem to be included in the Green Spaces Strategy, and yet is an important wildlife and biodiversity resource in the Authority, that can also provide open space in urban areas which may play an important role in the urban landscape by providing variety in the urban scene, an element identified in PPG 17, and in providing informal recreational space.</p> <p>1.3.2 Post-industrial land is subject to a Habitat Action Plan through the LBAP, Wildthings. The Action Plan includes identification and ranking of sites and creation of an at-risk register with a view to working towards appropriate management plans where possible, other attributes of these sites are not covered. In addition, the government is keen that various strategies and plans are integrated and interlink. One of the objectives of the Post-industrial Sites Action Plan is the integration of post-industrial sites into a wider strategy aimed at responding to the challenge of</p>	<p>Noted. Outside the remit of this Strategy. However, comments will be forwarded to the Assistant Director Planning &amp; Transport Development.</p> <p>Appropriate wasteland, derelict and post-industrial sites with potential as green spaces will be identified under Action 1.2 (as 'opportunity sites').</p>

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						<p>climate change and the establishment of a fully functional ecological network. Although we are keen to help set up, within Wildthings, an initiative that deals with this with regard to wildlife and biodiversity, it is unlikely that such an initiative will be set up in the near future. In the New Year, we are involved in a BRERC exercise to produce an inventory of Post-industrial Sites, with accompanying notes. This should be of help to B&amp;NES for the Green Spaces Strategy.</p>	
						<p>1.4.0 Burial grounds– <b>“encouraged or desirable”</b></p>	
						<p>1.4.1 The council takes the view that the inclusion of burial grounds would send the wrong message, perhaps being thought to suggest that these areas could or should be used more extensively by the public. We do not feel that this inference will be drawn if the council is careful to state in its introductory text that not all the green spaces in the strategy are accessible to the public and that some are only accessed in a very limited way. Allotments are usually accessible to allotment-holders only. If the argument that extensive use by the public could be encouraged or inferred by inclusion in the Strategy, then allotments would also have to be excluded. The council takes the view that public access to burial grounds is not to be encouraged or desirable. The same goes for allotments, in general, as this makes theft of produce more likely and increases fear of theft. In addition, it is important to keep dogs out of allotments.</p>	Noted
						<p>1.4.2 We feel that the burial grounds need to be taken fully into account when assessing and auditing the green spaces resource in the authority and need to be managed appropriately. Although we would agree that there are good examples of where graveyards are managed sensitively from the point of view of the users and also as wildlife and visual resources, we know of graveyards</p>	Noted

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						and associated land that have been managed in ways that are detrimental to wildlife interests when more sensitive management would have been of greater benefit both to those paying their respects to the dead and to wildlife interests, for example the graveyard opposite St Mary Magdalene Church in Lower Writhlington. Burial grounds can also be important visual features.	
						1.4.3 We accept that there is a danger of being either over- or under-prescriptive and that most burial grounds are out of the control of the council, but consider that it is important to include burial grounds in any assessment of the green spaces in the Authority, as they do have an important role to play aesthetically and socially, and with regard to the identification and function of local ecological networks.	Burial grounds fulfilling a recreation function are included.
						1.4.4 The council may prefer to adopt an approach whereby it produces guidance for management. We suggest that the Green Spaces Strategy should at least advocate use of such guidance for sites under private control and that the council commits itself to a timetable for the production of such guidance to coincide with the production of the Green Spaces Strategy.	The Council's Bereavement Manager is already working on a project to provide better guidance to burial ground managers.
						1.5.0 Civic spaces	
						1.5.1 The council has left out civic spaces. We are aware that these would be covered by the Public Realm Strategy for Bath and by the Norton Radstock Streetscape Strategy, but we are unaware of other Strategies that would include this type of space elsewhere in the Authority. We are unclear over whether there will be any audit or assessment of such spaces in relation to the two strategies.	It is likely that these sites will be audited and assessed under Action 1.2 ('opportunity sites').
						1.5.2 Although these civic spaces are not essentially	Sites identified under Action 1.2 with

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						green, they are often 'greened' with plantings, hanging baskets and so on. We feel that it is not clear that assessment of quality, quantity and scope for improvements will be carried out in respect of civic spaces and that, therefore, the government's requirement in PPG 17 for robust assessments of open spaces may not be fulfilled.	opportunities for achieving local green space standards will be subject to robust assessments and appropriate management plans (Action 3.1).
						1.6.0 Conclusion	
						1.6.1 In conclusion, we assert that it is proper that open spaces identified in PPG 17 such as landscape features of visual importance (that may also be serving a wildlife purpose), burial grounds, wasteland, derelict land, and open spaces in urban areas that would not immediately be thought of as 'green spaces' should be covered by the Green Spaces Strategy.	Covered in responses above.
						1.6.2 It seems to us that the only alternative to this approach would be to draw up further strategies to deal with the other forms of open space that are not evaluated in the Green Spaces Strategy, but since some of these would essentially be green spaces we would consider this to be a clumsy and perhaps unwieldy approach to the problem.	Covered in responses above.
						2.1.0 MANAGEMENT FRAMEWORK FOR LANDSCAPE FEATURES OF VALUE IN A STRATEGIC CONTEXT	
						2.1.1 There is presently no Strategy that we are aware of within the Authority for identifying and providing a management framework for landscape features of value to wildlife in a strategic context.	Noted.
						2.1.2 There will be certain landscape features whose function is visual in nature, but that are	To be addressed under Action 1.2 which will identify such opportunities.



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						<p>secondarily of wildlife value and others whose function is primarily related to wildlife and community value, such as SNCIs. The Local Plan includes a monitoring programme, but this relates to targets that do not include any assessment of the quality of visually important open space or of designated nature conservation sites, merely the quantity. The Government makes it clear that quality is one of the vital factors in the reasoning behind the drawing up of Strategies such as the Green Spaces Strategy. Although the Authority will be identifying features that are important on a larger landscape scale regarding movement of species and genetic exchange (more to do with regional and sub-regional strategies and involving habitats that fall into the current habitat categories which, incidentally, many post-industrial sites do not), it is important that this is tackled at a very local strategic level in order to ensure that this actually takes place in practice. We feel that this is relevant to areas that both are and are not accessible to the public, and that the Green Spaces Strategy has an important role to play in ensuring that there are not deficiencies in supply and quality of this resource and in providing an appropriate management framework.</p>	
						<p>2.1.3 Campbell pointed out a need to produce interlinked strategies. We would hope that Action Plans and Strategies developed within the LBAP framework will interlink with the Green Spaces Strategy. We feel that in order to achieve the interlinking of strategies there will, necessarily, be some overlap and that this is a good thing.</p>	<p>Noted. Expanded Executive Strategy will provide links to other strategies.</p>
						<p>3.1.0 A FRAMEWORK FOR PLANNING OBLIGATIONS</p>	
						<p>3.1.1 In the companion guide to PPG 17, a best practice example is given (Doncaster Council) in</p>	<p>Action 1.2 will address this through identifying any sites and opportunities towards achieving</p>

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						<p>which the Strategy's role in providing a clear framework for planning obligations is flagged up. We would hope that the Green Spaces Strategy will be useful in not only determining that obligations are necessary, but in also providing an inventory of resources and improvement needs that could prove invaluable in determining where the best opportunities for compensation and ecological enhancement are to be found. In line with this, it would be important to include within the Strategy a comprehensive assessment of landscape features including features such as wasteland and derelict land, in accordance with guidance in PPG 17.</p>	<p>local green space standards.</p>
						<p>4.1.0 TYPOLOGY</p>	
						<p>4.1.1 The council asserts that a simplified approach to typology has been adopted in recognition of the multi-functional nature of the majority of green spaces and the diverse range of provision, management and need. However, the Government recommends attributing 'primary purpose' to get over problem of audit and satisfaction of local needs and to promote fitness for purpose. It suggests that councils may want to add categories, not take them away.</p>	<p>Action 3.1 will address. Management Plans will identify the 'primary purpose' of sites and how this relates to the overall levels of provision of various green space facilities.</p>
						<p>4.1.2 It does not seem that all the category types in PPG 17 that we feel should be addressed can be addressed under the three categories suggested – for example, we are not convinced that it is appropriate to categorise urban farms (such as Bath City Farm) as 'natural'. However, we agree with the council that land that is used directly should be distinct from land that is not. We feel that the category of 'amenity greenspace' suggested in the companion guide should be subdivided into that which is a purely visual amenity and that which also provides opportunities for informal activities such as walking.</p>	<p>Action 3.1 will address. Management Plans will identify the 'primary purpose' of sites and how this relates to the overall levels of provision of various green space facilities.</p>

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						<p>4.1.3 We are concerned that an overarching category of 'natural' is too vague to be useful in identifying deficiencies in areas of importance for particular purposes, one of the functions that the strategy is required to fulfil. For example, an area may have a good proportion of 'natural' green space and yet may have a poor level of space of value to wildlife conservation and environmental education, or conversely may have a good amount of the latter but few opportunities for informal activities or residential amenity green space. As argued above, there appears to be no other suitable mechanism for dealing with the issues of quality, quantity and need. PPG 17 describes the functions of open space as including as havens and habitats for flora and fauna, with the potential to be corridors or stepping stones from one habitat to another and as areas that may contribute towards achieving objectives set out in local biodiversity action plans. It is important that such land is identifiable and audited if this resource is to be assessed.</p>	Action 3.1 will address. Management Plans will identify the 'primary purpose' of sites and how this relates to the overall levels of provision of various green space facilities.
						<p>4.1.4 The Council points out in the chapter on relevant policy that the value of open space is considered to depend on two key aspects, the extent to which it meets the identified needs of the local community and the wider benefits for people, wildlife, biodiversity and the wider environment. It also says that the companion guidance points out that quality relates to fitness for purpose and this requires clarity as to what the purpose is. We feel that in order to produce a robust document that achieves the aims of determining value, need and deficiency in a meaningful and applicable way, and that is consistent with PPG9 (which recognizes the important part that biodiversity and geological conservation can play in green space provision) and with other policy documents, it is important that the separate issues are examined in sufficient detail</p>	It is considered that these issues have been examined in sufficient detail in relation to the scope of the Green Space Strategy.

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						<p>and appropriately audited.</p> <p>5.1.0 Hierarchy - District and Neighbourhood green spaces</p> <p>5.1.1 We have looked at the allocations of green space in Norton Radstock and note that the areas marked as 'natural' are restricted to Access land and former railway routes. It appears from this and from looking through at other areas briefly, that there are a number of sites, some more obvious than others, which have not been included as green spaces in the Strategy. Among them are,</p> <p>in the Norton Radstock area:</p> <ul style="list-style-type: none"> <li>• Radstock Railway Land is accessible by the public via a permissive path right through the site and unlocked gates at several locations allowing entry into other parts of the site. It is well used by the public and certainly qualifies as greenspace according to the typology of PPG17, and within the B&amp;NES typology;</li> <li>• the bridleway that runs from Radstock Sewage Works to Lower Writhlington has not been included (have any bridleways?);</li> <li>• NCN 24 from Meadow view through Radstock Railway Land and on towards Frome has not been included, although we assume that the reference to Waterloo Road refers to the route of the cycle route in the other direction;</li> <li>• private allotments at Tynning next to the new school. As the Haydon allotment site at least is allotment-holders only, we would not have thought that there was a distinction between private and council-run allotment sites;</li> <li>• two reserves at Paulton maintained by Cam Valley Wildlife Group, to which the public has access, including for educational</li> </ul>	<p>Noted. Action 1.2 will identify 'opportunity sites'. These observations will be fed into the annual review (Action 1.17).</p>

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						<p>purposes;</p> <ul style="list-style-type: none"> <li>• land to either side of the disused railway from Radstock through Midsomer Norton has not been included;</li> <li>• small area in Writhlington, possibly community woodland (and possibly not yet set up)</li> </ul> <p>and elsewhere:</p> <ul style="list-style-type: none"> <li>• Tucking Mill, an excellent reserve at Coombe Hay and Brown's Folly (Avon Wildlife Trust Reserve) immediately come to mind. We suggest that you contact Avon Wildlife Trust and the Yatton and Congresbury Wildlife Group for lists of their reserves;</li> <li>• Chew Valley Lake and the associated public recreational area do not appear to be included. Are there any other bodies of water and parks elsewhere in the authority that are also missing? The Government's intention is that these should be included;</li> <li>• Greyfield Wood is well frequented by the public and may have a 'Friends group';</li> <li>• A number of woodlands are accessed via public footpaths, including Lords Wood, Common Wood (Hunt Street), Cleaves Wood (between Wellow and Norton St Phillip), and Hankley Wood (near Wellow).</li> </ul> <p>5.1.2 The minimum size placed on a natural green space seems to us to be rather arbitrary, and could be considered to be too small. Radstock Railway Land, for example, is a green space of phenomenal value for its size, considered by English Nature to be borderline SSSI and by other authorities to be of national importance (and qualifying as of international significance/UK important using IEEM guidelines as recommended by the Government). It would seem inappropriate if a site of this calibre were</p>	<p>A particular designation of a site under the local standards hierarchy is a mechanism for ensuring local provision but does not mean that it cannot have a much wider function.</p>

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						<p>to qualify as only a Neighbourhood site, as it is clearly of educational importance for the whole District and is located on the outskirts of an urban area, a good proportion of the site being beyond the existing urban area. The site is a 7.6 ha site (not to be confused with the extent of the proposed development site for which planning permission is presently being sought, which is over 8 ha and includes other urban land).</p>	
						<p>5.1.3 We suggest that there may be other locations along the route of the Somersetshire Coal Canal that qualify as green spaces, although we haven't scoured the Strategy to see!). There is a Somersetshire Coal Conservation and Access Strategy. Miriam Woolnough should be able to give more information on this if it is not something yet chased up. The last address we have for the Avon Industrial Buildings Trust, who drew up the document, is Sunnyside, Avon Close, Keynsham, BS18 1LQ</p>	<p>Noted. These observations will be considered when assessing opportunities under Action 1.2 and as part of the annual reviews under Action 1.17.</p>
						<p>6.1.0 Draft Standards</p>	
						<p>6.1.1 Draft Standards are based upon satisfaction in Keynsham. We do not feel that this is the correct basis for such a standard. The maps show variable standards of provision and it is unclear what types of survey were undertaken to determine satisfaction. In addition, as mentioned before, we do not feel that there has been a sufficiently robust determination of which green spaces have been included in the audit. We feel that the standard for the urban areas in the Authority should be determined according to where it is highest and according to the scope for improvement. If the standard to be attained across the district is lower than that, the rest of the District will always be the 'poor relation' to Bath. We do not consider this to be an appropriate state of affairs. Further, we consider that the standard should also be compared with</p>	<p>The on-street surveys and focus groups indicated the highest levels of satisfaction in Keynsham. It was felt, therefore, that such levels of provision would provide a sound and rational basis for draft standards.</p> <p>PPG17 Companion Guide suggests that standards should be achievable and realistic and this was an important consideration in drafting the proposed local standards. Also, quantity levels are only one aspect of the standards and accessibility and quality are additional important considerations embraced by the proposed local standards.</p>

GREEN SPACE STRATEGY CONSULTATION – EXTERNAL RESPONSES							
ID	Organisation	Contact	Support	Object	Part of Strategy	Comment	Council Response
						<p>that in other comparable Authorities, and that B&amp;NES should aspire to reach their standards, not appear far down the table as set out in the consultation document. If there is room for improvement in Bath and elsewhere, this should be aimed at.</p> <p>6.1.2 We think that the examination of unrestricted green space should be a part only of the assessment of green space in the Strategy.</p> <p>7.1.0 Quality Scores</p> <p>7.1.1 The average quality scores are based upon incomplete audits, so we assume will be updated before the Strategy is completed. As there are a number of sites that have not been included, we urge the Authority to address this issue urgently in order that quality can be determined accurately.</p> <p>8.1.0 Distance from natural green spaces</p> <p>8.1.1 We note that the following guide from English Nature is included in the chapter on policy:  (ANGSt) model and published “A Space for Nature” to promote them. The ANGSt model set the following standards;</p> <ul style="list-style-type: none"> <li>• “No person should live more than 300m from their nearest area of natural green space of at least <b>2 ha</b> in size</li> <li>• Provision of at least 1 ha of local nature reserve per 1000 population</li> <li>• There should be at least one accessible <b>20 ha site</b> within 2 km from home</li> <li>• There should be one accessible <b>100 ha</b> site within 5 km</li> <li>• There should be one accessible <b>500 ha</b> site within 10 km”.</li> </ul>	<p>Strategy Section 2 - Classification of Green Space sets out the scope of the document i.e. green space freely accessible at all reasonable times for public use.</p> <p>Addressed under Action 3.3.</p> <p>Actions 1.2 and 1.17 may lead to a full ANGSt assessment where appropriate.</p>

## GREEN SPACE STRATEGY CONSULTATION – EXTERNAL RESPONSES

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						<p>The council only provides two distance criteria of over 2 ha and over 10 ha. We feel that this is insufficient to properly analyse the access to green spaces in the authority. Once all the types of space that are accessible have been determined, it should be possible to carry out further analysis of access to include larger areas and accessibility by various means including by car, bicycle and public transport.</p> <p>9.1.0 We note that there do not appear to be cross-references to Local Plan policy in the document, as is expected according to government guidance.</p>	Appendix F provides the link to relevant planning policies and references are given there.
13	Sport England	Gary Parsons, Sport England (South West)				Does the strategy include playing pitches / bowling greens / tennis courts etc... to enable a comprehensive PPG17 strategy for B&NES?	No, a separate sports facilities strategy is being developed to cover these items. Once complete the 2 strategies will cover all PPG17 items.

### Appendix 1 Accessibility to Woodland in using the Woodland Trust Woodland Access Standard

		BANES	All South West
Accessible woods	% population with access to 2ha+ wood within 500m	22.23%	7.97%
	% population with access to 20ha+ wood within 4km	49.22%	59.41%
Inaccessible woods	% extra population with access to 2ha+ wood within 500m if existing woods opened	27.31%	34.14%
	% extra population with access to 20ha+ wood within 4km if existing woods opened	48.80%	32.99%
Woodland creation	% population requiring new woodland creation for access to a 2ha+ wood within 500m	50.47%	57.88%
	% population requiring new woodland creation for access to a 20ha+ wood within 4km	1.98%	7.60%
	Minimum area of new woodland required for 2ha+ woods within 500m (ha)	245ha	6,126ha
	Minimum area of new woodland required for 20ha+ woods within 4km (ha)	40ha	1,644ha



