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To: Whom it may concern

**RE: AGSP Consultation – Horfield and Lockleaze Area Ideas and Options Paper**

Please find below the response from Friends of Horfield Common to the AGSP proposals for Horfield Common, including the Ardagh and Wellington Hill Playing Field.

FOHC's response to the AGSP has been informed by our members and by other local residents and users of the common through a variety of different means including a survey, questionnaire and open meetings (attended by more than 300 local residents and other users of the common), in addition to a number of events at which FOHC has sought out residents' views on the proposals.

**By means of an overview, please note that FOHC object to the proposed disposal of Wellington Hill Playing Field – full details in support of this objection are detailed below.**

**Please note also that FOHC object to the proposals to close the tennis courts, decommission the Bowling Green or reduce the ancillary facilities at The Ardagh.**

**However, FOHC fully support the proposals to reconsider the use of the pavilion and wider site in order to make it more flexible and accessible to a broad range of user groups, and to ensure that the facilities are invested in to ensure that they remain open and accessible to local people.**

**FOHC wish to emphasise that we believe that provision for, facilities for, and support for development of Ardagh Bowling Club (which is resident in the current pavilion) should form part of any proposals for redevelopment or improvements to the site**

**FOHC would welcome the opportunity to work collaboratively with Ardagh Bowls Club, BCC and other partners to achieve our shared ambitions for improvements to, and development of, the facilities at the Ardagh for the benefit of all current and future user groups.**

## Wellington Hill Playing Field

Following publication of the AGSP consultation Ideas and Options Proposals, FOHC sought clarification of the way in which the 'value' of Wellington Hill Playing Field had been assessed, as the statements in the AGSP and accompanying SADMOT documents that the 'field is little used other than by dog walkers for much of the week,' did not match the perceived usage or value of the field by the local community.

The value assessment for the field is attached<sup>1</sup>. It is clear in this assessment document that, contrary to what is detailed in the AGSP Ideas and Options Paper which clearly states that *'a value assessment took place for all sites identified for possible disposal in Horfield and Lockleaze, checks on its significance in all the key areas were considered,'*; checks on the level of use of the space did not in fact take place prior to its inclusion in these proposals as a site for potential disposal.

The level of use assessment for the site suggests that potentially a maximum of two people – neither of them local residents - have been consulted about their perceptions of the level of use of the field, and clearly states that the level of use of the site has not been independently surveyed.

In view of this, FOHC do not believe that Wellington Hill Playing Field should be included in the AGSP as a site for disposal. However, the below offers a comprehensive response to the proposal to dispose of the site, in line with the request of the consultation that groups and individuals comment on the proposals as they are put forward and regardless of material inaccuracies in the process that has led to the development of the proposals.

The Horfield and Lockleaze Area AGSP<sup>2</sup> Ideas and Options paper states that:

- i) This area of playing fields is located close to Horfield Common, which provides a key area of open space for this part of the city and contains a range of facilities.
- ii) There is also the nearby Ardagh, which currently contains tennis courts and a bowling green.
- iii) The site is little used for much of the week other than by dog walkers.
- iv) Any development of this site will have to be preceded by archaeological investigations as remains of a medieval structure were found on the adjacent site currently being developed as a nursing home.

FOHC object strongly to the proposal to dispose of Wellington Hill Playing Field for development. In response to the specific statements (i – iv) above:

- i) Whilst Wellington Hill Playing Field is located close to Horfield Common (including the Ardagh), it is the only playing field in the area which is freely accessible where ball games (including football) are able to be played. It is not permitted to play ball games on Horfield Common. Therefore the loss of this field

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<sup>1</sup> Appendix 1. 'Value Assessment Summary' for Wellington Hill Playing Field, Bristol City Council, 2010

<sup>2</sup> Area Green Space Plan: Horfield and Lockleaze Area, Ideas and Options Paper, Bristol City Council, 2010.

would mean a significant loss of sport and recreation facilities for the local community.

Additionally, the facilities on Horfield Common referred to in this statement are themselves threatened with closure through the AGSP. As such the suggestion that these facilities somehow provide adequate access to recreational and sports facilities to mean that Wellington Hill Playing field is not a loss of valuable recreational and sports facility space to the local and wider community is disingenuous and misleading.

- ii) The facilities within the Ardagh Sports Centre are highly valued by the local community but the tennis courts and bowling green are themselves threatened with closure through the AGSP. As such the suggestion that these facilities somehow provide adequate access to recreational and sports facilities to mean that Wellington Hill Playing field is not a loss of valuable recreational and sports facility space is disingenuous and misleading.

Additionally, the current sports facilities within the Ardagh Sports Centre (when adequately maintained) enable tennis and bowls to be played. They do not enable football (either organised or informal) to be played, nor provide the opportunity for children to learn to ride their bicycles in a safe green space, to play rounder's games, cricket games, to enjoy kite flying, dog training nor any of the other myriad of activities that take place in Wellington Hill Playing Field on a regular basis. On publication of the AGSP Ideas and Options proposals in June 2010, FOHC undertook a survey of local residents which asked if people did use the field, and if so, what they used it for. The results of this survey are attached in Appendix 2. Names and addresses have been excluded from the attached data but are available on request. Responses to this survey regarding people's use of the field make clear that it is well-used for a wide range of activities which would not be possible to continue to engage in if Wellington Hill Playing Field is disposed of. Again, the suggestion that the facilities at the Ardagh somehow provide adequate access to recreational and sports facilities to mean that Wellington Hill Playing field is not a loss of valuable recreational space for the local community is disingenuous and misleading.

- iii) FOHC does not believe this statement to be valid or a true representation of the usage or value of Wellington Hill Playing Field. In a recent survey carried out by Friends of Horfield Common (July 2010), we have received responses from more than 200 local residents, users of the common and members of Friends of Horfield Common to a questionnaire about their use of the Wellington Hill Playing Field. Again, please see Appendix 2 for full details of this data.

**Without exception – all respondents stated their opposition to the proposal that the Wellington Hill Playing Field is a suitable site for disposal. A significant recurring issue in people's feedback was the disparity that local people perceived between the stated use and value of the field in the AGSP, and their lived-experience of, and observations of its usage over (for some residents)**

many years. The responses that FOHC obtained from residents in this survey contrast dramatically with the information that has been published as part of the AGSP, which states that Wellington Hill Playing Field is 'little used for most of the week other than by dog walkers'.<sup>3</sup>

For this reason, FOHC strongly oppose the proposal to dispose of Wellington Hill Playing Field.

To understand how this vast disparity in perceptions of the use of the field occurred, and to attempt to address this potentially significant inaccuracy, FOHC sought clarification of how the assessment of use was enacted. As detailed in the opening of this response – it is clear that the assessment of value of this site was invalid. FOHC sought answers specifically to the following questions, which we have continued to include in this response, despite now knowing that the assessment was flawed because the rationale for the importance of the field to the local community which is detailed in the responses remains important for consideration in this consultation process.

1. Who the 'Stakeholders' were who were consulted in drafting the AGSP document?

None of the leaders of any of the groups who use the field for activities on a weekly basis were consulted or asked to provide any details of the schedules of work that they do with a wide range of groups. Horfield Parish Church Hall adjoins the field and opens out directly onto it. Horfield Parish Church Hall functions as a vibrant community centre – it has a wide-range of groups who meet for sessions there throughout the year. These groups include 'Welly Tots' – Mums and Toddlers Group, Playgroups, Dog Training Groups, Brownies, Guides, Rainbows, Youth Clubs, Drama Groups and many others.

All of these groups use the field during their sessions, and have used it consistently without challenge or specific permission for many years. The groups meeting in the Church Hall include those delivering extensive programmes of work with young people from the ages of 4-18 years – there is a youth group (Horfield Young People's Club/Geoff's Club) which has been meeting in the hall on a Friday evening every week since 1975 (and which has had the same leader throughout this time in terms of ease of being able to make contact with the group).

These groups would not be able to continue their activities without being able to use Wellington Hill Playing Field.

Manor Farm Boys Club is located opposite the field, at the junction of Kellaway Avenue and Wellington Hill Playing Field and has been using the field 2-3 times per week for more than 40 years.

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<sup>3</sup> Ibid, P21.

62nd Bristol Scout Troop's meeting hut is located in the field itself. The group has more than 120 members; they use Wellington Hill Playing Field throughout the year for their activities, and have been doing so for more than 70 years.

2. At what times of day, on which days of the week, and over what period of time was the usage of the field monitored for?

The proposition that Wellington Hill Playing Field is 'no longer required as Open Space' was challenged by all respondents to the FOHC questionnaire, who detail significant usage of the space for a broad-range of activities across a broad-range of age and interest groups. Respondents questioned the validity and transparency of the process by which the field was deemed to fit the criteria for disposal by BCC. The response to our survey confirmed for FOHC that the analysis of the usage of this space (as presented in the AGSP and consequently in the Site Allocations and Development Management Options proposals being consulted on concurrently with the AGSP) does not reflect the actual use of the space. This is of significant concern to FOHC.

Residents' feedback in their questionnaires details that local people have had access by right to Wellington Hill Playing Field since prior to World War 2.

As has now been accepted by the officer in charge of the value assessment for Wellington Hill Playing Field – this assessment was not carried out according to the process that is detailed in the AGSP documents and FOHC believe that this invalidates the assessment of the field as 'surplus to requirements as open space.'

3. As is now clear - it is the case that the information stated in the AGSP regarding the use of Wellington Hill Playing Field is factually incorrect, and has therefore potentially been misleading to those outside of the locality who are considering, and commenting on, the proposals as part of a joined-up city-wide strategy – how will this be addressed to ensure that any decision made regarding the future of the site is informed by accurate information and that this potential misinformation is not detrimental to any outcome of decisions related to Wellington Hill Playing Field's 'Local Plan Designation/Allocation,'<sup>4</sup> nor that it influences any decision to sell the site for development?

iv) If any development of this site will have to be preceded by archaeological investigations as remains of a medieval structure were found on the adjacent site currently being development as a nursing home – the costs of this archaeological investigation may be significant. As the proposals for the AGSP clearly state that green spaces will be sold to '*raise money to reinvest back into park improvements*'<sup>5</sup> this option would not seem to offer a likely outcome of

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<sup>4</sup> 'Options for Site Allocations and Proposed Designations' document, Bristol City Council, 2010: P94.

<sup>5</sup> AGSP Ideas and Options Paper Horfield and Lockleaze Area Green Space Plan, Bristol City Council, 2010. P6

acceptable value for money for taxpayers in the city,<sup>6</sup> in addition to the significant detrimental impact that development of the site would have environmentally and for the health and well-being of local residents.

Bristol City Council's previous '*Bristol's Parks and Green Space Strategy*'<sup>7</sup> document, published in 2008, describes parks and green spaces as '*green lungs of the city,*' and as '*having well documented health benefits both in improving physical fitness and improving mental health.*'<sup>8</sup> Within the same document green spaces are described as being '*central to the way that cities adapt to climate change, including their role in capturing and storing water after heavy rainfall, preventing localised flooding. Green Spaces also provide an important cooling effect in cities.*'<sup>9</sup> There are ongoing, unidentified problems with the drainage and subsidence of land in the Horfield Common area which are detailed in the AGSP itself<sup>10</sup>, and these issues may be exacerbated significantly in the future if this land is built on.

On a related note, FOHC is interested to understand why ground movement in the Horfield Common area is viewed by the Council as an impediment to maintaining or improving the Ardagh facilities for local residents, but this is not mentioned or noted as a potential impediment to the sale of, and subsequent development of Wellington Hill Playing Field for private profit?

The AGSP states that '*the Horfield and Lockleaze Neighbourhood Partnership area is considerably under-served for Natural Green Space with the majority of Horfield outside of the distance standard.*'<sup>11</sup> Bishopston, Cotham and Redland's AGSP states that '*the area has one of the lowest amounts of publicly accessible open space in the city,*'<sup>12</sup> and Henleaze, Stoke Bishop and Westbury-on-Tryms' AGSP Facilitators Summary states that '*there is a limited amount of green space in this neighbourhood partnership area.*'<sup>13</sup> Whilst the council may classify the field as 'a facility for active sports', it serves many purposes and is clearly a natural space. It is also well used by residents who live in Bishopston – the boundary of which begins on Horfield Common (the Ardagh is officially in

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<sup>6</sup> It is to note that only 70% of the income generated from the sale of green spaces in the city will be reinvested in parks and green spaces, and that it is not proposed to reinvest the funds generated in individual NP areas directly back into them. Therefore the loss of valuable green space in Horfield and Lockleaze is no guarantee that other spaces in the area will experience any improvement over the period of the next 20 years covered by this AGSP.

<sup>7</sup> Adopted by Bristol City Council in February 2008

<sup>8</sup> Page 40

<sup>9</sup> Page 27

<sup>10</sup> <sup>10</sup> AGSP Ideas and Options Paper Horfield and Lockleaze Area Green Space Plan, Bristol City Council, 2010. P10

<sup>11</sup> Page 27

<sup>12</sup> Ideas and Options Paper Bishopston, Cotham and Redland AGSP, Bristol City Council: Page 13

<sup>13</sup> '*Facilitators summary observations of ideas and suggestions arising from the stakeholder participation process for the AGSP for W-O-T, Henleaze and Stoke Bishop*' document, Bristol City Council, 2009.Pg. 1

Bishopston) as well as residents who live in Horfield, Manor Farm, Henleaze, Filton and other local areas.

Bristol City Council's current '*Playing Pitch Strategy (PPS)*' states in its '*City-wide Assessment by Sport*,' that '*there is a significant under-provision of junior facilities*' for football, and that '*there is an undersupply of adult football pitches in Lockleaze at peak times.*'<sup>14</sup>

There is a more detailed discussion of other inconsistencies in relation to the AGSP plans and the consequent issues that arise from these later in this response, but it is clear following scrutiny of the AGSP, PPS, PGSP and associated documents that the proposal to sell Wellington Hill Playing Field would be counter to aims stated in other parts of the AGSP, and related Bristol City Council policies.

It is to note that there is repeated (albeit subtle) suggestion<sup>15</sup> in the AGSP documents as a whole that 'backland sites,' are generically problematic in terms of vandalism and other anti-social behaviours. FOHC wish to underline that, despite falling in to the category of 'backland site' as defined in the AGSP, Wellington Hill Playing Field does not experience these issues as it is well used and valued by the local community.

**In view of all of the above, FOHC objects strongly to the proposal to dispose of Wellington Hill Playing Field as a site for development. FOHC believes that the information regarding the usage of the field published in the AGSP and consequently in the SADM documentation is misleading and inaccurate, and that the site does not meet the criteria for disposal of a green space detailed in Bristol City Council' BCS9 policy, nor the criteria detailed in assessing the use value of a site in the AGSP itself<sup>16</sup>.**

**FOHC objects to the proposal to sell Wellington Hill Playing Field and regards the site as a highly valued, well-used and crucial community facility.**

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<sup>14</sup> PPS, Section 5, Pg. 24.

<sup>15</sup> See *AGSP Ideas and Options Paper for Horfield and Lockleaze*, Bristol City Council, 2010. Page 6 for an example of this.

<sup>16</sup> *AGSP Ideas and Options Paper Horfield and Lockleaze Area Green Space Plan*, Bristol City Council, 2010. P19

## **Horfield Common (including the Ardagh)**

In view of the number of options for the Ardagh, the individual proposals stated in the ideas and options paper are detailed below, followed immediately by FOHCs response to each:

- i) The main use of the Ardagh Sports Centre will change and a site masterplan and feasibility study [sic] drawn up to consider the following options:

This statement proposes that it has already been decided that the main use of the Ardagh will change. Who has made this decision & how has this been reached? Who has been informed by? - which stakeholders have been invited to take part in any discussions about this and on the basis of what information has any decision been made?

If it the case that it is pre-determined that a masterplan will be drawn up – who will be invited to participate in this? How long will this process take? The site is deteriorating due to neglect and a lack of maintenance by Bristol City Council and further delay in addressing this is of real concern.

- **Maintain the tennis courts on site but review the number of courts.**

*FOHC believes that the courts should be retained and maintained to a standard which means that they are safe and suitable to be played on. FOHC believe that some of the courts could potentially be made multipurpose so that they can host other sports (for example Netball and Basketball) to further encourage intergenerational use of the Ardagh, and would like to see the Ardagh become a Hub Site for sport in Bristol as its capacity meets the criteria for this and this area is not covered by BCC's current proposals for access to a Hub Sites within an acceptable distance (3000m) in Bristol. Will BCC consider this proposal as a response to the AGSP consultation?*

*Development of a MUGA at the Ardagh and development of the Ardagh's potential as a hub site for tennis would enable the Council to meet a number of stated objectives and ambitions. It is to note that the current PPS published by BCC in 2008) identifies a lack of high quality provision for tennis outside of the private sector in Bristol and the Ardagh has the potential to build on its established provision as a tennis centre to be developed into a Hub Site for tennis. FOHC would encourage the holistic consideration of the impact of these proposals.*

*This development of the Ardagh facilities would prevent the loss of any further green space on the site of the current Horfield Leisure Centre as it would convert already developed courts for use into the future and it would make provision for sports available across the Neighbourhood Partnership area (rather than concentrating all investment and provision on one site. The location of the Ardagh mean that this hub site/MUGA would also continue to serve residents of the neighbouring Neighbourhood Partnership areas meaning significant benefit to a large number of residents in these areas, as well as wider users who travel to the site from beyond these 3 NP areas.*

or

- **Decommission all tennis courts and relocate them to a nearby site if ‘turn up and play’ tennis facilities are required locally, e.g. Muller Rd Recreation Ground. Taking account of the facilities at Orchard School in Horfield.**

*FOHC believes that the loss of these sports facilities would be a significant detriment to the local community and strongly objects to any proposal to decommission them.*

*Although the Ardagh is, for the purposes of the AGSP included in the Horfield and Lockleaze Ideas and Options Paper, these facilities are used by residents of Bishopston, Henleaze, Manor Farm, St.Andrews, Filton and other areas of Bristol, in addition to those resident in the immediate local area to the North, which is defined by the artificial AGSP administrative boundary.*

*FOHC does not accept the proposal that sports facilities at Muller Road or Orchard School are an acceptable alternative to those at the Ardagh.*

*The statement that these alternatives would be suitable if ‘turn up and play’ facilities are required locally demonstrates a concerning lack of awareness of the popularity of these tennis courts and the demand for provision in this area. The provision of public sports facilities - available to all residents within walking and cycling distance of their home addresses – should be a priority for BCC in support of numerous other of the council’s own policies regarding active lives and healthy living. The Ardagh should be prioritised through the AGSP for improvement and maintenance. FOHC oppose any proposal to reduce the range of provision at the Ardagh.*

- **Maintain the bowling green and the current function of the pavilion.**

*FOHC believes that the bowling green should be maintained. This is a priority as the green is currently not being maintained by BCC and is in danger of falling into disrepair if this is not addressed, despite the best efforts of the Ardagh Bowling Club.*

*FOHC believes that the function of the pavilion should be developed to enable a broader range of usage (see below for further details of proposals re: pavilion and supporting building work), but views it as essential that this ensures that the current resident bowling club is part of that plan and that the bowling green remains commissioned and at the heart of the site.*

Or

- **Change the function of the pavilion to serve a wider range of users. This could include a cafe with outside seating area, modern toilet facilities with baby changing and a potentially a room that could be hired out. Alternatively it could be for soft play.**

*FOHC believes that the function of the pavilion should be developed to serve a wider range of users, but that this does not need to be at the expense of Ardagh Bowling Club who have been resident in the pavilion for decades and who have recently been solely responsible for maintaining many of the facilities following withdrawal of BCC resources for this. FOHC would welcome the development of a more flexible building, including spaces for community use, and a cafe and public toilet facilities etc.*

*It is to note that a cafe and new public toilet facilities could be achieved through the use of some of the outbuildings at the Ardagh (stone buildings which have a courtyard that could be used for a seating area, and which opens out directly onto the common with a clear view of the current play area for supervision of children, if necessary). It is possible that this could be achieved in a short time span and this visible improvement of the site could encourage ongoing use of Horfield Common. This could develop the scope of provision and wider use of the potential of the whole site, rather than reducing it.*

- **Decommission the bowling green and use it in association with an alternative use of the pavilion, for example as a cafe garden.**

*FOHC strongly opposes the proposal to decommission the Bowling Green at the Ardagh. FOHC believes that the multi-generational use of the Ardagh is crucial in ensuring that the centre genuinely is a site with broad appeal and believes that this proposal has the potential to alienate and specifically exclude the many older people who are active at the Ardagh Bowling Club throughout the year.*

*This proposal would be counter to the stated ambitions for the site to appeal to broader range of user groups.*

*Rather than supporting a proposal to close the Bowling Provision at the Ardagh, FOHC would like to see BCC support the Ardagh Bowling Club to increase its membership and to work in partnership with other groups (for example a community gardening club who could maintain the formal planting areas etc) to make the site genuinely inclusive for a broad-range of user groups - including those who are over 50, as well as young people and families.*

- **Provide a new children's playground with outdoor water play facility;**

*FOHC believes that the provision of adequate children's play facilities on Horfield Common (along with toilets and refreshment facilities) is a priority. The common has suffered from decades of neglect in this respect whilst parks in other areas of Bristol have been repeatedly refurbished. Feedback from local parents, families and other residents is that this is a high priority and will further support and encourage increased use of the common.*

*Whilst Horfield Common, including the Ardagh is being considered in the Horfield and Lockleaze Area Green Space Plan - it is also the nearest park for hundreds of local residents and families living in Bishopston, Henleaze, Ashley Down, Manor Farm and*

*other areas of the city. (The artificial boundary drawn around this in the AGSP is unhelpful in this respect). There are a lack of high-quality play facilities in the area.*

The provision of play areas which are of a comparable standard to those in other areas of the city is a priority. FOHC itself has raised funds throughout the last 4 years to be able to purchase pieces of play equipment to improve the play provision on Horfield Common, although we have been prevented from purchasing this by the Council until the outcome of the AGSP consultation is known. We fully support this priority for local children and young people to have access to high-quality play provision within walking distance of their home addresses.

- **Provide a new multi-use-games area for a variety of ball games;**

*FOHC believes that a MUGA could be incorporated into the Ardagh successfully and could support the ambition to make the centre a Hub Site with the potential for broader appeal.*

*Outside of the Ardagh itself, informal football walls and nets (for basketball and netball practice for example) within a designated play area would be welcome and enable older children and adults to play informally and encourage active lives. Managing the positioning of these so that this play did not disrupting the games taking place within the Ardagh centre (as tennis, bowls etc tend to be quieter games) should be considered, rather than viewing intense provision within the Ardagh and no development of the current play area as the only options for Horfield Common.*

- **Provide new, formal gardens;**

*FOHC does not believe that there is any need for new, formal gardens as part of the Ardagh, but that there is a need to maintain the formal gardens that are already part of the site. For the past 4-5 years these have been maintained by the Ardagh Bowls Club at their own expense, and this is unsatisfactory. Maintenance of these gardens is a priority and would be low cost to achieve. Prioritising this has the potential to make a significant difference to the perceived quality of the space by local residents, and could also work to counter the increasing impression of neglect of the facilities at the site.*

- **Explore the provision of an equipped, fitness area for older people;**

*This is not a priority. The Bowling Green currently serves as a fitness area for (largely although not solely) older people and investment in this is a priority.*

*Rather than creating new provision at the Ardagh – considering how the site could be better used to encourage participation from older people - for example a gardening club, a facilitated bowling club and a walking club for older people could further encourage interaction with other people of a similar age, and from other generations and additionally support healthy living and community cohesion agendas.*

- **If not all the space is needed, reduce the area currently within the Ardagh boundary, creating new areas of informal green space.**

*FOHC believes that all of the space within the current Ardagh should be retained for recreational and sporting facilities as the centre is already surrounded by informal green space. However, FOHC believes that the use of space within the Ardagh could be better used and welcomes the proposal that the centre should be developed to continue to provide appropriate and fit-for-purpose facilities for a broad-range of user groups. The repurposing of specific spaces within the Ardagh could ensure that the Ardagh remains a vibrant sporting and recreational facility, whilst broadening its appeal to a broader range of user groups, for example through the provision of a cafe and accessible public toilet facilities. See attached Appendix 3 for proposals which have been developed through discussion with local people about the way in which the site could be developed to meet the needs of all user groups into the future.*

- **Reconsider the boundary treatment of the Ardagh and whether high fencing is required.**

*If the sports facilities are maintained, which FOHC believes is a priority, the fencing is necessary to prevent balls flying out of the courts into the surrounding area. However, it may be appropriate to lower the fencing around specific areas, if these will not have a negative impact on the use of the centre by members of the local community, or impact negatively on security of the site.*

- **Selectively remove some of the trees over a period of time if shown to be needed as part of work to stabilise ground conditions at the site.**

*FOHC understands that trees on Horfield Common are protected by planning laws which prevent them being cut down as they are on common land. In this case, FOHC understands that it would be illegal to go ahead with this proposal, but would support the professional services of tree-surgeons etc attending to the trees.*

*After a long period of neglect, the trees on Horfield Common have recently begun to be maintained again by BCC contractors, and this is welcomed by FOHC. It is hoped that ongoing active management of the trees in the Horfield Common area may mean that removing any trees will not be necessary to achieve any future ambitions for the site – the environmental impact of any removal of trees would be of significant concern to FOHC and warrant further consideration.*

*At an Open Public Meeting that FOHC hosted on 28 July 2010 to discuss the AGSP proposals at the Ardagh ( attended by more than 160 local residents and users of the Ardagh), a local historian was able to confirm – in response to the suggestion that the movement of the site should be an impediment to development - that the land in this area has always been subject to some movement. One attendee exclaimed that ‘you would have thought nobody had ever built on the side of a hill before,’<sup>17</sup> and this*

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<sup>17</sup> FOHC OPEN MEETING notes, 28 July 2010, available at [www.friendsofhorfieldcommon.com](http://www.friendsofhorfieldcommon.com), accessed 10 August 2010

*summed up many local people's frustration at the failure of BCC to address the deterioration of the site previously.*

*It was noted at that same meeting that there have been significant advances in building technologies since the original development of the site<sup>18</sup>, and that these should be able to surmount any issues re: stabilising the ground in order to retain the facilities for use by future as well as current generations. FOHC view this as a priority for the AGSP.*

- **Make more of a feature of the stream running along the south west and southern boundaries. The impact on nearby houses would have to be assessed.**

*This is not a priority, although increased maintenance and management of the 'ditch' areas may prevent the frequent flooding that currently characterises the stream's impact on nearby houses and the common itself.*

*As well as the impact on nearby houses, FOHC strongly advocates that the views of householders are meaningfully considered prior to any work in this area, if this is identified as a priority in the AGSP.*

- **Provide a meadow and nature area in the space where the children's playground is currently located, if a new play area was installed on the Ardagh.**

*This is not a priority. Development of play facilities on Horfield Common are a priority for the AGSP, and FOHC would prefer to see this space invested in and developed fully as a play area. See attached Appendix 3 for further details of alternative proposals developed by FOHC in response to the AGSP for this specific site.*

*Attention to the boundary areas of Wellington Hill Playing Field could be considered for this focus on nature, if it is deemed necessary.*

- **Provide more seating to enjoy the views.**

*FOHC have recently funded the provision of additional seating on Horfield Common, in addition to new provision by Bristol City Council. Additionally, there are two benches which are to be reinstated once the current building work on the Concorde Lodge site has been completed (these were removed to enable access to the site).*

*Rather than providing any further additional seating – at present, the maintenance of the seating that is already in place would be preferred, and this be achieved at relatively low cost. Many of the benches at the top of the common near to Kellaway Avenue and those under the trees beside the tennis courts on the North side of the common are in a poor state of repair. Maintenance of existing seating is a priority.*

### **Common Land adjacent to Horfield Parish Church**

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<sup>18</sup> Ibid

- **Create a new natural green space - increasing wildlife value with wildflower planting**

*This is not a priority. Increasing wildlife value in Wellington Hill Playing Field would be of more benefit and would be better use of limited resource.*

#### **Common Land adjacent to Abbots Way**

- **Restore the water fountain and make it more of a feature**

*This is not a priority. FOHC members have questioned how sensible the proposal is to make a feature of this water fountain as it is located at a major junction by a very busy crossroads.*

*Additionally, several members voiced their concerns that the fountain would be used as a urinal, which has happened historically.*

*Maintenance of the fountain to prevent vandalism is seen as valuable, but any further development of this, or investment in it is not a priority.*

- **Create a new natural green space - increasing wildlife habitat with wildflower planting**

*This is not a priority. Resources could be better spent maintaining and improving Wellington Hill Playing Field and The Ardagh/Horfield Common areas.*

#### **Common Land at the junction of Gloucester Rd and Kellaway Ave**

- **Create a new natural green space - increasing wildlife habitat with wildflower planting**

*This is not a priority. As this land is bordered by 2 major roads and frequently walked across – the value of wildlife being encouraged to thrive here is questionable.*

- **Introduce more formal planting beds close to the main road junction to create an attractive feature on this major route in to the city.**

*This is not a priority. FOHC doesn't doubt that it would make this major route into the city more attractive, but questions whose benefit this planting would be for? Would it benefit local residents (noting that this option would mean money being spent here instead of on other sites in the local area) or benefit those commuting past this site from other areas of Bristol, or indeed outside of the city? This is not a priority for the area, unless sponsored by private financing (see roundabout on the Downs for examples of this – has this been explored? – this could be used as a promotional opportunity for marketing a business etc)*

### **Common Land south of Horfield Sports Centre**

- **For information: The children's playground at the end of Bishopthorpe Road is being renewed and potentially moved to the space in front of the Territorial Army Centre.**

*FOHC supports the provision of high quality play facilities throughout the Horfield Common area. As this playground site is currently the subject of a separate consultation – FOHC have no further comment to make on this specifically.*

- **Use tree planting and boundary improvements in front of the TA Centre to create a 'space within a space', perhaps where events might take place.**

*This is not a priority. FOHC is unsure how attractive events on this green space would be to local residents, as the space is surrounded on three sides by roads – one of which is 'a main route into the city' and without additional fencing would not be a safe space for children to play or for large groups to congregate. This is not a priority for the area – resources could be better and more meaningfully used elsewhere to provide space where events may take place – specifically this provision could be located at the Ardagh.*

- **Provide new seating**

*This is not a priority. Extensive additional seating in this area has already been provided by BCC since the publication of the AGSP Ideas and Options Paper was published. Therefore further provision is not a priority.*

- **Create a marked mile to support healthy walking and running. The possibility of installing a Multi-Use-Games- Area either to the side or the rear of Horfield Sports Centre is suggested in the section on Dorian Road Playing Fields.**

*The marked mile has already been provided, which is welcome for local residents, but this does raise a concern about the validity of the AGSP consultation process if specific proposals have already been prioritised?*

*Rather than installing a Multi-Use-Games-Area (MUGA) at Horfield Sports Centre and intensively-developing that site – provision of accessible facilities across the area would be preferred. The Ardagh site, for example, could be developed to include a MUGA, which would enable a more sustainable approach to supporting healthy, active lives across the area.*

*A MUGA at the Ardagh would support the potential of that site to be a hub site. Additionally the conversion of the large triple-court currently at the Ardagh to a MUGA would mean that no further green space was lost in the Horfield Common area to enable the building of this.*

In addition to commenting on the specific proposals above for the Horfield Common area (including the Ardagh), which are individually detailed in the AGSP Ideas and Options paper for Horfield and Lockleaze<sup>19</sup>, below are the details of our responses to wider issues raised by the AGSP Ideas and Options documents. There are a number of inconsistencies in some of the proposals being put forward as part of the Horfield and Lockleaze Ideas and Options plan when considered in tandem with associated documents and sub-strategies of the AGSP published by BCC (the Playing (Pitch Strategy, for example).

The Ardagh is actually located in the Bishopston, Cotham and Redland Neighbourhood Partnership (NP) area, and is on the border of the Henleaze, Stoke Bishop and Westbury-on-Trym NP area, but for the purposes of the AGSP is being considered as part of the Horfield and Lockleaze plan. The complexity of this artificial division of the Horfield Common area for administrative purposes raises a number of issues.

The first issue is that local residents who are interested in and concerned about the proposals for development or disposal of open spaces through the AGSP have needed to engage with the NP's in 3 different areas. Ensuring that local people's views are represented when the Horfield Common area as a whole is divided administratively between 3 different decision-making groups in the NP structure is of real concern to FOHC.

The Horfield and Lockleaze AGSP Ideas and Options paper states that *'it is recognised that they [the boundaries between NP areas] provide an artificial boundary,'* and that *'in drawing up this Ideas and Options Paper, the proximity and use of spaces in neighbouring areas has been taken into account.'*

The AGSP for Bishopston, Cotham and Redland AGSP states *'that the area has one of the lowest amounts of publicly accessible open space in the city.'*<sup>20</sup> The *'Facilitators summary observations of ideas and suggestions arising from the stakeholder participation process for the AGSP for W-O-T, Henleaze and Stoke Bishop,'* states in its opening sentence that *'There is a limited amount of green space in this Neighbourhood Partnership Area.'*<sup>21</sup>

Consideration of the usage of Horfield Common (including Wellington Hill Playing Field and the Ardagh) by residents of the 3 NP areas which these facilities sit at the junction of is crucial to ensure that this artificial division of the city does not work against the aims of the AGSP city-wide or to the detriment of this area specifically.

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<sup>19</sup> AGSP Ideas and Options Paper Horfield and Lockleaze Area Green Space Plan, Bristol City Council, 2010.

<sup>20</sup> Page 13

<sup>21</sup> *'Facilitators summary observations of ideas and suggestions arising from the stakeholder participation process for the AGSP for W-O-T, Henleaze and Stoke Bishop'* document, Bristol City Council, 2009.Pg. 1

In considering the wide range of information available in the AGSP documents for the 3 NP areas (including overarching policy and subsidiary documents to the AGSP), there are a large number of inconsistencies and FOHC is concerned that there is not in fact the appearance in them that *'in drawing up this Ideas and Options Paper, the proximity and use of spaces in neighbouring areas has been taken into account.'*<sup>22</sup>

As previously detailed in this response, BCC's current 'Playing Pitch Strategy(PPS)<sup>23</sup>' document states in the *'City-wide Assessment by Sport,'* that *'there is a significant under-provision of junior facilities'* for football, and that *'there is an undersupply of adult football pitches in Lockleaze at peak times.'*

Additional inconsistencies in the relationships between the PPS (which is a sub-strategy of the Parks and Green Space Strategy), the Parks and Green Space Strategy (which is the policy adopted by the BCC cabinet in 2008 and the basis on which the AGSP has been developed) and the AGSP proposals for Horfield and Lockleaze include:

1. Failure for the PPS to include Wellington Hill Playing Field in the map showing Publicly Accessible Seasonal Hire Pitches (Map 1.1; Page 21)<sup>24</sup>. This document was published in 2008 and describes the pitch as having already been decommissioned. Local people and groups have no recollection of any consultation taking place prior to 2008 regarding this decision, and the football pitch is well used and needed.
2. As noted above, the same document states in the *'City-wide Assessment by Sport,'* that *'there is a significant under-provision of junior facilities'* for football.'(Section 05, Page 24).

The document goes on to underline this when it states that In the North & West Bristol City Council planning area (Section 6.2, Page 37), *'undersupply of junior football pitches at peak times (-13.7) is indicated'* and *'undersupply apparent for Senior football within Lockleaze (-2.6).'*

Why is the council considering selling Wellington Hill Playing Field when these are the facilities that it provides?

The PPS policy states that *'loss of publicly available green space would be considered acceptable as measured against the Green Space Standard for Bristol if the assessment identifies it complying with all of the following criteria:*

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<sup>22</sup> AGSP *Ideas and Options Paper, Horfield and Lockleaze Area*, Bristol City Council, 2010: Pg. 5

<sup>23</sup> 'A Playing Pitch Strategy for Bristol 2009,' Bristol City Council Environment and Leisure, 2008. Section 5, Pg. 24

<sup>24</sup> 'A Playing Pitch Strategy for Bristol 2009,' Bristol City Council Environment and Leisure, 2008.

- *It is of poor or moderate quality with little chance of being improved*
- *It is in an area where there is sufficient alternative good or excellent (or potentially good or excellent) quality publicly available green space, and*
- *Its loss would not adversely impact on the Council's minimum standard.'*  
(P65)

Regardless of the administrative result of the third point above (which would change in tandem with a change of boundaries for administrative purposes so can be deemed to be endlessly mutable for the council's purposes), Wellington Hill Playing Field does not meet the criteria for either of points 1 or 2 (ball games are not allowed on Horfield Common, therefore this is the only local space available for this activity) and the field is in excellent condition – demonstrated by its extensive use for games of football (and other sports and recreation) for decades by local people.

**In view of this, any proposal to sell Wellington Hill Playing Field for development would fail to meet the criteria, which are set out in the 'Playing Pitch Strategy' which itself is part of Bristol City Council's 'Green Space Strategy'<sup>25</sup>. This is a significant inconsistency.**

In relation to the Ardagh, the PPS states that there is an *'insufficient supply of accessible Tennis Courts of a usable standard within the city to accommodate the current demand, forcing most users to play in the private sector.'* (Section 5.6, Page 27) It also states that *'isolated sites with little or no ancillary facilities are of the poorest quality, and are prone to vandalism,'* (ibid). The Ardagh has the potential to supply the courts to meet this demand in a centre which has ancillary facilities which with investment could offer high quality courts which could host clubs, offer coaching and coach education, admin and facilities, changing and social provision, training and conditioning, child protection and club development. These are all of the common elements required for a site to be a hub-site (PPS, page 43) and to become a vital resource for tennis in the city.

The system by which BCC has chosen to classify green spaces in the city is not necessarily accurate in representing the nature of green and open spaces (other than administratively). Wellington Hill Playing Field is used for a wide range of purposes including recreation, seasonal sports, and there is a strong presence of urban wildlife in it. This should be considered in relation to the site & the site should be considered holistically, rather than allocating the space to meet only one of these classifications. Diversity should be encouraged and supported. This is a valuable space. The suggestion that a space can only be considered as a 'natural green space' if 'it's

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<sup>25</sup> *Green Space Strategy*, Bristol City Council, adopted by the cabinet on 21 February 2008, available at [www.bristol-city.gov.uk](http://www.bristol-city.gov.uk), accessed on 10 August 2010.

*predominant function is to provide people with access to and experience of nature'* is absurd and works against ensuring that people have access to spaces to enjoy nature such as Wellington Hill Playing Field which is also used for sports. The proposal to sell the field for development whilst there is a need for sites in the city which host urban wildlife, and in which natural habitats exist is unacceptable.

The PPS states that *'Nature sites and formal parks are less of an immediate need for users (than informal amenity space), and people are prepared to walk for up to 20 minutes to access them. Active sports space usage is indicating people will be prepared to travel for up to 30 minutes by car...a 20 minute car journey from any location within Bristol would take user outside of the City's Boundary.'*

This underlines the use value of Wellington Hill Playing Field as an accessible active sports space for users across the city, and the Ardagh as a centre which attracts users from wide radius. Both Wellington Hill Playing Field (as a sports pitch) and The Ardagh and its formal gardens (if invested in and properly maintained) attract users from Bishopston, Henleaze, Southmead, Westbury-on-Trym, Filton, Lockleaze, Ashley Down, Redland and Westbury-on-Trym as well as Horfield.

The above findings in the PPS also underline the flexibility of interpretation of the Council's designated classification system for spaces in relation to the proposals in the AGSP. If this rationale for the sale of open and green spaces to raise revenue were followed through dogmatically – we could sell all active sports space in Bristol (as residents are prepared to travel for 30 minutes which would take them outside of the city to participate in active sports). This would clearly be unacceptable and counter to the myriad of policies and strategies trying to encourage residents, including young people in the city to lead active lives.

The proposal to dispose of Wellington Hill Playing Field fails to adhere to the criteria stated in Bristol City Council's *Green Infrastructure Core Strategy (BCS9)* regarding the release of open spaces for development. This policy states that the Strategy seeks *'to safeguard and enhance important green infrastructure – such as open spaces, recreation areas and wildlife sites – across the city....'*<sup>26</sup> and that *'open spaces should only be released for development where they are no longer important for recreation, leisure and community use and where development would result in improved urban form or an enhancement to existing open spaces.'*

Wellington Hill Playing Field remains important for recreation, leisure and community use.

Any development of the site would not result in improved urban form nor an enhancement to the existing open space, therefore Wellington Hill Playing Field should not be being considered as a site for disposal.

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<sup>26</sup> *'Bristol's Parks and Green Space Strategy'*<sup>26</sup> document, Bristol City Council, 2008.

It is to note that Bristol City Council's previous '*Bristol's Parks and Green Space Strategy*'<sup>27</sup> document, published in 2008, describes parks and green spaces as '*green lungs of the city,*' and as '*having well documented health benefits both in improving physical fitness and improving mental health.*'<sup>28</sup> Within the same document green spaces are described as being '*central to the way that cities adapt to climate change, including their role in capturing and storing water after heavy rainfall, preventing localised flooding. Green Spaces also provide an important cooling effect in cities.*'<sup>29</sup> There are ongoing, unidentified problems with the drainage and subsidence of land in the Horfield Common area, and these issues may be exacerbated significantly in the future if this land is built on.

Map 1.8 in the PPS '*Minimum Hub Sites for Maximum Coverage*' (Page 47) demonstrates that there are areas which fall outside of BCC's maximum acceptable 3000m distance standard for these Hub Sites. These are the only gaps in provision across the whole city, and these gaps coincide with the site of the Ardagh.

This reinforces FOHCs proposal that Ardagh should be considered as a Hub site for sports in Bristol.

The same is evident on Map 1.7 in the PPS which shows proposed '*additional hub sites*' beyond the '*minimum for maximum coverage*'. There is not an additional hub site in the Horfield/Redland/Bishopston/Cotham/Henleaze/Lockleaze/Filton areas. As the Ardagh is already a sports facility, and local residents are not currently being provided with the proposed minimum access to this sort of provision – development of the Ardagh into a Hub Site for Tennis, including a MUGA for other sports is a strong priority for the AGSP.

The Playing Pitch Strategy (PPS) states in relation to Bowling that '*although the model identifies a small number of centres and rinks, this does not take into account club based traditions. Whilst an oversupply is evident, any rationalisation will have to consider the wider implications of this sport*' (Page 28).

Retention of the bowling green at the Ardagh is crucial to ensuring that the intergenerational nature of the centre is retained (this ripples out into the local community through a broad range of interest groups) and supports the ongoing community cohesion that is characteristic of the area.

**In the AGSP Ideas and Options Paper for Horfield and Lockleaze (Pg. 6) the potential for securing external funding to develop and improve public facilities in green spaces across the city is identified. FOHC would welcome the opportunity to**

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<sup>27</sup> Adopted by Bristol City Council in February 2008

<sup>28</sup> Page 40

<sup>29</sup> Page 27

**work as part of a consortium of local organisations (and individuals) to pursue this, and believe that this is a feasible opportunity. FOHC would like to pursue this approach to enable improvements to the Ardagh site, rather than the loss of facilities in the local area.**

Yours Faithfully,

Kay Thomson, Chair FOHC

Cc: Cllr. Cheryl Ann  
Cllr. Pete Levy  
Cllr. Beverley Knott  
Cllr. David Willingham  
Cllr. Gary Hopkins  
Cllr. Glenise Morgan  
Sam Rkaina, Bristol Evening Post  
Charlotte Leslie MP