

## Hengrove & Whitchurch Park draft Neighbourhood Development Plan 2017-2030

Bristol City Council comments on submission version (Reg. 15/16 stage)

### 1. Parts of the draft plan that are in conflict with strategic policies of the Local Plan

It is considered that the following matters are not in conformity with the strategic policies in the Local Plan.

Policy	Comment	Action	Suggested revision
HWP1: A revitalised Hengrove Park	<p>The requirement for ongoing maintenance funding as part of any permission for the development of the site and park is overly prescriptive, onerous and will reduce flexibility for development. The Council's Strategic Policy for the site (as set out in the Local Plan Site Allocations and Development Management Policies Annex - Development Considerations for Hengrove Park - ref. BSA1401) does not set such a requirement.</p> <p>For this reason the policy is not fully consistent with the Council's Strategic Policy for the site (as set out in the Local Plan Site Allocations and Development Management Policies Annex - Development Considerations for Hengrove Park - ref. BSA1401) and will therefore be in conflict with the Local Plan.</p>	Should be revised as suggested to avoid conflict with Local Plan policy.	<p><b>Development Proposals for the Hengrove Park Site should include a large high quality park of 'destination' quality, as development guidance in the Local Plan indicates (appendix 4). The remodelled Hengrove Park should ideally include the following facilities and design and layout features:</b></p> <ul style="list-style-type: none"> <li>• <b>Sports pitches for public use;</b></li> <li>• <b>Indoor changing facilities with showers and toilets as a minimum to replace existing facilities;</b></li> <li>• <b>A new scout hut with secure area around to replace the existing facility;</b></li> <li>• <b>Historic references to, and information on, the former airport and its' history;</b></li> <li>• <b>The runway space retained but imaginatively recreated with physical reference to the historic hard surface surrounded by a grass sward setting retained at least in part;</b></li> <li>• <b>An expanded Children's Play Area with facilities for a wide range of ages, linking well into the rest of the Park;</b></li> <li>• <b>Extensive well-surfaced cycle and walking facilities for travel and recreational purposes, fully accessible and linking safely and directly to active travel facilities beyond the Park;</b></li> <li>• <b>Formal Park attractions and planting as agreed;</b></li> <li>• <b>Tree-planting to improve areas of open woodland and replace loss of trees on site;</b></li> <li>• <b>Potential for an events space;</b></li> <li>• <b>Outdoor gym facilities;</b></li> <li>• <b>Improvement of the Mounds SNCI that respects the wildlife and biodiversity value of the site;</b></li> <li>• <b>Better green links between the Mounds and</b></li> </ul>

			<p>remodelled Hengrove Park.</p> <p>A management plan <del>and ongoing maintenance funding should be required</del> <u>will be expected as</u> part of any permission for the development of this site and Park.</p>
<p>HWP6: Sites of Local Wildlife Interest</p>	<p>The policy identifies sites of ‘Local Wildlife Interest’ for protection and states that ‘Development of these areas should be avoided, and where development will impact on them, protection of the feature and mitigation measures will be required.’</p> <p>One of the three sites identified, Tennis Courts Hartcliffe Campus Site, is also allocated in the Local Plan (Local Plan Site Allocations and Development Management Policies Annex - Site of former City of Bristol College [Hartcliffe Campus] - ref. BSA1401). The Development Considerations make provision for the retention of the ‘Open Mosaic Habitat on Previously Developed Land’ on the site but also allows for the creation of this habitat elsewhere or the provision of green/brown roofs ‘if the retention of the habitat in situ is not practicable’.</p> <p>The policy as currently written is not entirely consistent with the Council’s Strategic Policy for the site (as set out in the Local Plan Site Allocations and Development Management Policies Annex - Development Considerations for Site of former City of Bristol College [Hartcliffe Campus] - ref. BSA1401) as it makes no provision for mitigation where retention of the feature is not possible and is therefore less flexible in approach to that of the strategic policy. For this reason the policy will be in conflict with the Local Plan.</p>	<p>Should be revised as suggested to avoid conflict with Local Plan policy.</p>	<p><b>Areas shown on the Proposals Map (Figure 11) and listed below have important local significance for the ecological and biodiversity strength of the neighbourhood area. Development of these areas should be avoided, and where development will impact on them, protection of the feature and mitigation measures will be required <u>where practicable</u>. The following are designated Sites of Local Wildlife Interest:</b></p> <p><b>Tennis Courts Hartcliffe Campus Site</b></p> <p><b>Brislington Brook, south of Airport road</b></p> <p><b>Macey’s Area south of Bishport Avenue</b></p>
<p>HWP8: Residential development at Hengrove Park</p>	<p>The policy makes reference to the Hengrove Park Masterplan. In particular, the policy requires development to follow the 5 Masterplan Moves (set out in the Hengrove Park Masterplan document November 2017) and to provide a park footprint broadly as shown on the</p>	<p>Should be revised as suggested to avoid conflict with Local Plan policy.</p>	<p><del>The Layout of d</del><b>Development on the Hengrove Park site should follow the five Masterplan Moves of the <u>will have regard to guidance within the</u> Hengrove Park Masterplan where this is feasible and viable</b> in order that a high quality large park is created out of the existing Hengrove Park and the new residential development interacts well with the</p>

	<p>Masterplan (identified on the Hengrove Park Framework Plan set out in the Hengrove Park Masterplan document November 2017).</p> <p>These requirements are overly prescriptive. The 5 Masterplan moves provide one example of a spatial concept for the site. The Hengrove Park Framework Plan is presented in the Masterplan as one indicative approach to achieving the 5 Masterplan Moves and does not rule out alternative indicative masterplans for the site provided they take account of particular guiding principles. Converting an individual spatial concept and an indicative site layout within the Masterplan document into absolute requirements within the policy is too inflexible.</p> <p>The policy as currently written may prevent alternative development solutions from coming forward that are consistent with the Council's Strategic Policy for the site (as set out in the Local Plan Site Allocations and Development Management Policies Annex - Development Considerations for Hengrove Park - ref. BSA1401). For this reason the policy will be in conflict with the Local Plan.</p>		<p><b>new park and greatly increases the level of informal surveillance of the Park.</b></p> <p><b>Residential development should be of a density of 70 dph or more so that the Park footprint can be maximised with approximately 1,400 dwellings to be provided on the site, of varying type, size and tenure. <del>The Park footprint to be broadly as shown on the Masterplan, reproduced as Figure 5 in this Plan and available via the Appendix 1 link.</del></b></p> <p><b>Good Design will be required throughout the development, with legibility created through the use of design features, height and massing of buildings as well as public art. Maximum interaction with the Park and new residents is to be encouraged with soft boundaries and the use of green fingers into new residential development.</b></p> <p><b>In line with Local Plan policy a minimum of 30% Affordable housing is to be provided on site, to include some shared ownership scheme dwellings, and to be interspersed throughout the site.</b></p>
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## **2. Strategic Environmental Assessment/Habitat Regulations Assessment - Screening Determination**

Bristol City Council undertook a screening exercise on the pre-submission consultation (Regulation 14) version of the plan to determine whether a formal Strategic Environmental Assessment (SEA) and Habitat Regulations Assessment (HRA) was required. Following analysis of likely significant effects the council considered that the draft plan was unlikely to have any significant effects on the environment and therefore, determined that a Strategic Environmental Assessment of the plan was not required. The screening opinion and determination was then sent to Historic England, Natural England and the Environment Agency to arrive at a determination in consultation with the statutory consultees. Responses received from both Historic England and Natural England supported the council's determination. No comment was received from the Environment Agency. Natural England utilised the information within the analysis of likely significant effects to also determine that the plan would be unlikely to give rise to significant environmental effects on European Designated Sites and can therefore be screened out from any requirement for further assessment under the Habitat Regulations.

Since consultation on the pre-submission version the Forum have made a number of amendments to the plan including amendments to some policies and the inclusion of a new policy *HWP6: Sites of Local Wildlife Interest*. The council have raised conformity issues with the policy but consider that subject to modification (see section 1 above) the policy would be broadly consistent with strategic policies in the Local Plan. The council has determined that the modified policy *HWP6* and amendments made to other policies would not result in any material difference to the original screening assessment and determination.

### 3. General comments on the draft plan

It is considered that the matters below are addressed to improve the precision and clarity of policies in the draft plan.

Policy/Para.	Comment	Action	Suggested revision
1.15/Fig. 1: the designated Neighbourhood Planning Area for Hengrove and Whitchurch Park	All Local Plan site allocations within the Neighbourhood Planning area should be referred to and identified on a map for information purposes.	Should be added for clarity.	Additional text at para. 1.15 to identify other Local Plan site allocations within the Neighbourhood Planning area. Fig. 1 updated to indicate location of Local Plan site allocations.
1.14	Could usefully refer to current application by Kier Living Limited (17/03943/F) for construction of residential units as part of Phase 1.	Should be added for clarity.	Additional text at para. 1.14 to reflect
HWP1: A revitalised Hengrove Park	The policy should refer to the Local Plan Site Allocations and Development Management Policies site reference.	Should be added for clarity.	<p><b>Development Proposals for the Hengrove Park Site should include a large high quality park of ‘destination’ quality, as development guidance in the Local Plan indicates (<u>see appendix 4 and Local Plan Site Allocation ref. BSA1401</u>). The remodelled Hengrove Park should ideally include the following facilities and design and layout features:</b></p> <ul style="list-style-type: none"> <li>• <b>Sports pitches for public use;</b></li> <li>• <b>Indoor changing facilities with showers and toilets as a minimum to replace existing facilities;</b></li> <li>• <b>A new scout hut with secure area around to replace the existing facility;</b></li> <li>• <b><del>Historic</del> References to, and information on, the former airport and its history;</b></li> <li>• <b>The runway space retained but imaginatively recreated with physical reference to the historic hard surface surrounded by a grass sward setting retained at least in part;</b></li> <li>• <b>An expanded Children’s Play Area with facilities for a wide range of ages, linking well into the rest of the Park;</b></li> </ul>
	Bullet point 12 refers to improvements that fall outside of the site allocation area and should be omitted from the policy and dealt with separately.	Should be revised to ensure the policy is precise.	

			<ul style="list-style-type: none"> <li>• Extensive well-surfaced cycle and walking facilities for travel and recreational purposes, fully accessible and linking safely and directly to active travel facilities beyond the Park;</li> <li>• Formal Park attractions and planting as agreed;</li> <li>• Tree-planting to improve areas of open woodland and replace loss of trees on site;</li> <li>• Potential for an events space;</li> <li>• Outdoor gym facilities;</li> <li>• <del>Improvement of the Mounds SNCI that respects the wildlife and biodiversity value of the site;</del></li> <li>• Better green links between the Mounds and remodelled Hengrove Park.</li> <li>• <del>A management plan and ongoing maintenance funding to be a requirement of any permission for the development of this site and Park.</del></li> </ul>
Fig.10: Wildlife corridors linking to Hengrove Park	The map should be updated to indicate existing Local Plan allocated sites and their relationship with wildlife corridors.	Should be revised for clarity.	Update Fig. 10 to show Local Plan allocated sites.
HWP3: Public art, creative industry and heritage promotion	The policy requirement to preserve the runway space and some of the previous setting is overly prescriptive and will not provide development with sufficient flexibility.	Should be revised to ensure the policy is capable of being implemented.	<p><b>The runway and site of Whitchurch Airport are important local heritage assets in an area that does not have many heritage assets. It is important that the development of the Hengrove Park site <u>has regard to the preservation of</u> <del>preserves</del> the runway space <u>and some of the previous setting</u>. References to the airport heritage should also be incorporated into the wider Park and built environment: public art would do this well.</b></p> <p>The existing Bottle Yard Studios is an important local cultural industry and its requirements for a low noise and dust environment should be protected as far as possible during construction works.</p> <p><b>Public Art projects for the Park and new built</b></p>

			environment are encouraged in order that the profile of the new development is raised and its distinctiveness and local character established.
<p>HWP4: Open space in Hengrove and Whitchurch Park</p> <p>HWP5: Local Green Space</p> <p>Fig. 11: Proposals Map</p>	<p>The policy requires that any re-location of open space should not create a shortage as defined in the Parks and Green Spaces Strategy 2008 in the original area.</p> <p>Further clarification is required in the text relating to the use of the Parks and Green Spaces Strategy.</p> <p>Further clarification required on whether the current quantity of open space would be reduced as a result of applying this part of the policy.</p>	Clarification required.	<p><b>Sites listed below and shown on figures 11 and 12 are designated as open space. Development that proposes the loss of designated open space or does not enhance the use of the site for its current open space use will not normally be permitted. Provision of alternative open space may be acceptable if the benefits of development of that open space are substantial and the alternative open space provided is of equal or better quality and accessibility to the local community. The re-location of any area of open space should not create a shortage of open space, as defined by the Parks and Green Spaces Strategy 2008, in the original area. Areas to be protected as open space are as follows:</b></p> <p><b>Land between Copeland Dr and Wedgewood Close</b>  <b>Land fronting Allerton Crescent</b>  <b>Land between Allerton Road and Evercrech Road</b>  <b>Land off Wharnecliffe Gardens</b>  <b>Corner of Rookery Way and Court Farm Road</b>  <b>Land fronting Tanorth Road</b>  <b>Land fronting Coulson's Road</b>  <b>Land fronting Airport Road</b>  <b>St Giles Allotment</b>  <b>Half Acre Allotments</b>  <b>Oatlands Allotments and Severn Project</b>  <b>Fortfield Road Allotments</b>  <del><b>Hartcliffe Community Park Farm</b></del>  <b>Land off Smythe Croft</b>  <b>Coulson's Park</b>  <b>Hartcliffe Millennium Park</b>  <b>Land fronting Belland Drive</b>  <b>Land fronting Fortfield Road</b>  <b>Paddock Garden</b>  <b>Land fronting Whitchurch Lane</b>  <b>Land fronting Cornhill Drive Staverdale Grove</b>  <b>Link between Fortfield Road and Kylross Avenue</b></p>
	Land at Half Acre has been identified on Fig. 11 as open space but has not been listed in either policy HWP4.	Should be corrected for clarity.	
	Hartcliffe Community Park Farm should be listed in policy HWP5 and not HWP4.		
	Land fronting Cornhill Drive should be identified on Fig 11.		

	Macey's Area off Bishport Avenue is identified on Fig. 11 as Local Green Space and should be listed in HWP5.		<p><b>Land off Totshill Drive</b>  <del>Macey's Area off Bishport Avenue</del>  <u>Land at Half Acre</u></p> <p>Residential Developments other than the Hengrove Park Regeneration Site will be encouraged to contribute appropriately to the improvement of existing open space as an alternative to providing more open space within the development unless a need for onsite provision exists.</p>
HWP6: Sites of local wildlife interest	To designate a site for its ecological value a quality threshold needs to be established for the designation using criteria that are made publicly available. The site then needs to be evaluated against these criteria in a report using recent, comprehensive survey data collected by a qualified ecologist. Survey data should include an assessment of the abundance of species. A formal peer-review and approval process is also required. This process has not been followed and the evidence submitted is limited.	Further evidence to support the policy and site selection should be submitted.	<p>Areas shown on the Proposals Map (Figure 11) and listed below have important local significance for the ecological and biodiversity strength of the neighbourhood area. Development of these areas should be avoided, and where development will impact on them, protection of the feature and mitigation measures will be required. The following are designated Sites of Local Wildlife Interest:</p> <p>Tennis Courts Hartcliffe Campus Site Brislington Brook, south of Airport road  <del>Macey's Area south of Bishport Avenue</del>  <u>Pigeonhouse Stream</u></p>
	The site Macey's area south of Bishport Avenue is identified as Local Green Space. This should be Pigeonhouse Stream	Should be corrected for clarity.	
Table 1	<p>The Local Green Space area for Hengrove Park as identified in Table 1 reflects the resultant park footprint as indicated in the masterplan (estimated about 30ha). It is noted that policy HWP5 does not directly refer to Table 1 or indicate a boundary for the Local Green Space area at Hengrove Park on Figure 11.</p> <p>However, setting the area of park that should be designated as Local Green Space may hinder alternative development solutions from coming forward that are consistent with the Council's Strategic Policy for the site (as set out in the Local Plan Site Allocations and Development Management Policies Annex - Development Considerations for Hengrove Park - ref. BSA1401). The reference to 30ha should be removed to provide greater flexibility.</p>	Should be corrected for greater flexibility.	Remove estimated area figure for Local Green Space at Hengrove Park.

HWP7: Allotments	<p>The site size threshold for the provision of allotment plots is significantly lower than the threshold set out in policy DM15 of the Local Plan. The lowered threshold would result in much higher levels of allotment provision across the Neighbourhood Plan area than currently required and an increase in provision on the Hengrove site from 7 plots, as set out in the Local Plan Site Allocations and Development Management Policies Annex - Development Considerations for Hengrove Park - ref. BSA1401, to 16 plots. The Forum may need to provide additional evidence to justify this significant increase in provision.</p>	To be considered.	<p><b>New residential development of 25 units or more will be required to provide allotment space of 100 sq m per 25 residential units, provision to rise proportionately with the number of residential units. Such space may be provided on site or off-site if in reasonable proximity to the development, in either case the land designated for allotments must be suitable for horticultural use and maintained for allotment use in perpetuity. Alternatively a financial contribution may be made of equivalent agricultural land value to improving open space <u>not identified as in need of improvement through the Bristol City Council Parks and Green Spaces Strategy 2008</u> and allotments in the neighbourhood area.</b></p>
	<p>The policy should not be seeking section 106 contributions towards the improvement of areas of existing open space where such areas have been identified for improvement in the Parks and Green Spaces Strategy 2008 and are funded through Community Infrastructure Levy.</p>	Should be revised to ensure the policy is precise.	
HWP8: Residential development at Hengrove Park	<p>The policy sets a density requirement of 70dph or more for the development of the site. Local Plan policy BCS20 sets a minimum indicative net density for development of 50 dph across the city. Whilst the Local Plan supports higher densities in appropriate locations the density requirement set out in policy HWP8 may have implications for the housing mix on the site, in particular the balance between houses and apartments and whether this constitutes an appropriate housing mix. Local Plan policy BCS18 expects all new residential developments to provide a mix of housing tenures, types and sizes to help support the creation of mixed, balanced and inclusive communities. The proportion of houses to apartments may also have implications for the viability of the development.</p> <p>The density should be set at a level that takes into account the requirements of Local Plan policy BCS18 and viability considerations.</p>	To be considered.	
HWP10: New community hub and protection of community facilities	<p>The policy requirement for particular uses within the community centre is overly prescriptive and not within the remit/control of a Neighbourhood Plan to</p>	Should be revised to ensure the policy is capable of being implemented.	<p><b>A Community Hub and Local Centre should be developed on the site to include small shop units suitable for retail use and a new community centre. <del>The</del></b></p>

	seek.		<p><del>Community Centre to include meeting and small event rooms, café, joint 'one stop shop' council services and a library if possible, and other facilities as opportunities arise, including museum artefacts explaining the history of the area and airfield.</del> Proposals for uses that would aid self-sufficiency of funding and maintenance will be considered favourably.</p> <p>Development proposals for change of use or redevelopment of existing community facilities will not be supported unless it can be shown that the facility is no longer viable or it is proposed to provide an alternative facility of equal or better standard and accessibility.</p>
HWP12: Priorities for community infrastructure levy spending	Priorities for CIL spending would be better expressed in the general text rather than as a policy.	To be considered.	

#### 4. General comments on the Masterplan

- The masterplan extends beyond the Local Plan Site Allocation (Local Plan Site Allocations and Development Management Policies Annex - Hengrove Park - ref. BSA1401).
- The location of residential development adjacent to existing business/commercial uses would need to take account of Local Plan policy BCS23.
- For the masterplan to be deliverable it should take account of/address the following issues:
  - The proportion of houses to flats needs to be commercially viable;
  - The combination of houses and apartments within the same building fabric could limit the range of developers able to deliver the scheme;
  - Whether it is desirable to remove woodland to the north of the site with existing mature trees;
  - Whether it is desirable to develop up to the boundary of industrial uses (rather than retaining existing trees as a buffer);
  - Whether it is desirable to provide single aspect north facing apartments;
  - Whether it is desirable to have 6 storey blocks given the surrounding built context.
- The development structure doesn't respond well to the Masterplan Moves diagrams at Figure 4, resulting in a poor legibility of the main routes through the site and a poor response to the local landscape structure/character.