

## Draft Hengrove and Whitchurch Park Neighbourhood Development Plan - Examination

### **Bristol City Council's comments regarding matters raised in examiner's question dated 30<sup>th</sup> July 2018 and the Hengrove and Whitchurch Park Neighbourhood Forum's responses dated 1<sup>st</sup> August 2018 in relation to the proposed designation of Hengrove Park as Local Green Space under policy *HWP5: Local Green space***

Bristol City Council has previously raised concerns (regulation 16 stage) over the setting of an estimated **area** for Hengrove Park (to be designated as Local Green Space) as remodelled in any new development. In Table 1 on page 30 of the draft Neighbourhood Plan the proposed park area has been estimated at about 30ha. The council considered that setting the area of the proposed park would hinder various development solutions coming forward for Hengrove Park that would otherwise be consistent with the council's strategic policy for the site (Site Allocations and Development Management Policies Local Plan July 2014 Policy SA1 BSA1401).

The adopted Local Plan allocates Hengrove Park for development which will include the provision of a large park; it does not designate the site as an important open space. Setting a **boundary** for the park area prior to its creation as part of the development raises the same concerns as mentioned above and will not provide sufficient flexibility for the strategic development allocation to be implemented.

The area, siting and boundary of the proposed park are not prescribed in the adopted Local Plan. These details will be determined through specific development proposals for the site. The provision of the park may include the remodelling/removal of existing features as proposed in the council's recently submitted outline planning application (<https://www.bristol.gov.uk/plans-for-hengrove>). For these reasons the setting of a boundary for a Local Green Space designation is considered premature and is not supported by the council.

The Forum has suggested additional text in the form of new paragraph 3.1.14. This explains that '*minor alterations*' to the Local Green Space designation boundary, due to surrounding proposals for residential development, would form part of the 'very special circumstances' whereby development on any Hengrove Park Local Green Space would be permitted. The National Planning Policy Framework 2012 states at paragraph 78 that:

*'Local policy for managing development within a Local Green Space should be consistent with policy for Green Belts.'*

Paragraphs 88 and 89 of the 2012 Framework go on to explain what is meant by 'very special circumstances' and what constitutes inappropriate development. The council considers that the 'very special circumstances' advanced in the suggested amendments to the NDP are not consistent with the Framework. In practice, the Forum's suggested amendments would have the overall effect of precluding development of a substantial part of the site allocated for development in the Local Plan.

The provision of the park as part of the development of the area is fully addressed in draft H&WP NDP Policy HWP1. Once provided, the remodelled park at Hengrove will without doubt meet the criteria for designation as 'local green space'. Meanwhile, Hengrove Park has a strategic development allocation that aims to deliver new homes and a large park. Having regard to the examiner's question and the Forum's responses, the Council considers that the most appropriate solution to ensuring that the neighbourhood development plan is consistent with strategic policies and meets the Basic Conditions is that references to Hengrove Park should be removed from draft policy HWP5.