

Independent Examiner's Report of the
Hengrove and Whitchurch Park
Neighbourhood Development Plan

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SECTION 2

Summary

As the Independent Examiner appointed by Bristol City Council to examine the Hengrove and Whitchurch Park Neighbourhood Development Plan, I can summarise my findings as follows:

- 1. I find the Hengrove and Whitchurch Park Neighbourhood Plan and the policies within it, subject to the recommended modifications does meet the Basic Conditions.*
- 2. I am satisfied that the Referendum Area should be the same as the Plan Area, should the Hengrove and Whitchurch Park Neighbourhood Development Plan go to Referendum.*
- 3. I have read the Hengrove and Whitchurch Park Consultation Statement and the representations made in connection with this subject. I consider that the consultation process was robust and that the Neighbourhood Development Plan and its policies reflect the outcome of the consultation process including recording representations and tracking the changes made as a result of those representations.*
- 4. I find that the Hengrove and Whitchurch Park Neighbourhood Development Plan can, subject to the recommended modifications proceed to Referendum.*
- 5. The current development plan for the Neighbourhood Plan Area is the Bristol Core Strategy (BCS) adopted in 2011 and the Site Allocations and Development Management Policies Local Plan (SADMLP) adopted 2014.*

SECTION 3

Introduction

1. Neighbourhood Plan Examination.

1.1 My name is Deborah McCann and I am the Independent Examiner appointed to examine the Hengrove and Whitchurch Park Neighbourhood Development Plan.

1.2 I am independent of the qualifying body, I do not have any interest in the land in the plan area, and I have appropriate qualifications and experience, including experience in public, private and community sectors.

1.3 My role is to consider whether the submitted Hengrove and Whitchurch Park Neighbourhood Development Plan meets the Basic Conditions and has taken into account human rights; and to recommend whether the Hengrove and Whitchurch Park Neighbourhood Development Plan should proceed to Referendum. My role is as set out in more detail below under the section covering the Examiner's Role. My recommendation is given in summary in Section 2 and in full under Section 5 of this document.

1.4 The Hengrove and Whitchurch Park Neighbourhood Development Plan has to be independently examined following processes set out in the Town and County Planning Act 1990 (as amended by the Localism Act 2011) and the subsequent Neighbourhood Planning (General) Regulations 2012 (as amended).

1.5 The expectation is that the examination of the issues by the examiner is to take the form of the consideration of the written representations. However, there are two circumstances when an examiner may consider it necessary to hold a hearing. These are where the examiner considers that it is necessary to ensure adequate examination of an issue or to ensure a person has a fair chance to put a case. Having read the plan and considered the representations I concluded that it was not necessary to hold a Hearing.

2. The Role of Examiner including the examination process and legislative background.

2.1 The examiner is required to check whether the neighbourhood plan:

- Has been prepared and submitted for examination by a qualifying body*
- Has been prepared for an area that has been properly designated for such plan preparation*
- Meets the requirements to i) specify the period to which it has effect; ii) not include provision about excluded development; and iii) not relate to more than one neighbourhood area and that*

- *Its policies relate to the development and use of land for a designated neighbourhood area.*

2.2 The examiner must assess whether a neighbourhood plan meets the basic conditions and other matters set out in paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990 (as amended).

2.3 As an independent Examiner, having examined the Plan, I am required to make one of the following recommendations:

1. The Plan can proceed to a Referendum

2. The Plan with recommended modifications can proceed to a Referendum

2.4 Where a policy does not meet the basic conditions or other legal requirement I may, on occasion, need to delete wording, including potentially an entire plan policy and/or section of text, although I will first consider modifying the policy rather than deleting it. Where a policy concerns a non-land use matter, advice in the Planning Practice Guidance states “Wider community aspirations than those relating to development and use of land can be included in a neighbourhood plan, but actions dealing with non-land use matters should be clearly identifiable. For example, set out in a companion document or annex.” As such, when considering the deletion of any non-land use matters from the plan, I will consider if I can make a modification to place the relevant proposed actions in a non-statutory annex to the plan, dealing with ‘Wider Community Aspirations’. I will not generally refer back to parties on these detailed revisions. I will make modification either in order to meet the Basic Conditions, to correct errors or provide clarification. However, the focus of my examination, as set out in legislation is relatively narrow, I must focus on compliance with the Basic Conditions. The main purpose of a neighbourhood plan is to provide a framework for the determination of planning applications, policies in a plan may have elements which either seek to control things which fall outside the scope of the planning system or introduce requirements which are indiscriminate in terms of the size of development or overly onerous and would not meet the Basic Conditions. In these circumstances it will be necessary to make modifications to the plan. In making any modifications I have a duty to ensure that the Basic Conditions are met however I am also very careful to ensure, where possible that the intention and spirit of the plan is retained so that the plan, when modified still reflects the community’s intent in producing their neighbourhood plan.

3. The Plan does not meet the legal requirements and cannot proceed to a Referendum

3.1 I am also required to recommend whether the Referendum Area should be different from the Plan Area, should the Hengrove and Whitchurch Park Neighbourhood Development Plan go to Referendum.

3.2 In examining the Plan, I am required to check, under Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990, whether:

- the policies in the Plan relate to the development and use of land for a designated Neighbourhood Area are in line with the requirements of Section 38A of the Planning and Compulsory Purchase Act 2004
- the Plan meets the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 to specify the period for which it has effect
- the Plan has been prepared for an area designated under the Localism Act 2011 and has been developed and submitted for examination by a qualifying body.

3.3 I am also required to determine whether the Plan complies with the Basic Conditions, which are that the proposed Neighbourhood Plan:

- Has regard to national policies and advice contained in guidance issued by the Secretary of State;
- Contributes to the achievement of sustainable development; and
- Is in general conformity with the strategic policies contained in the Development Plan for the area.

The Plan must also not breach, and otherwise be compatible with EU obligations and Human Rights requirements.

3.4 Bristol City Council will consider my report and decide whether it is satisfied with my recommendations. The Council will publicise its decision on whether or not the plan will be submitted to a referendum, with or without modifications. If the Neighbourhood Plan is submitted to a referendum, then 28 working days' notice will be given of the referendum procedure and Neighbourhood Plan details. If the referendum results in more than half those voting (i.e. greater than 50%), voting in favour of the plan, then the Local Planning Authority must "make" the Neighbourhood Plan a part of its Development Plan as soon as possible. If approved by a referendum and then "made" by the local planning authority, the Neighbourhood Plan then forms part of the Development Plan.

SECTION 4

The Report

1. Appointment of the Independent examiner

1.1 Bristol City Council appointed me as the Independent Examiner for the Hengrove and Whitchurch Park Neighbourhood Development Plan with the agreement of Hengrove and Whitchurch Park Neighbourhood Plan Group.

2. Qualifying body

2.1 The Hengrove and Whitchurch Park Neighbourhood Plan Forum (also known as the “Hengrove and Whitchurch Park Neighbourhood Plan Group”) was designated on 7th November 2016.

2.2 I am satisfied that the Hengrove and Whitchurch Park Neighbourhood Plan Group (the Forum) meets the necessary requirements and is the Qualifying Body.

2.3 Where there is no parish or town council who can lead on the creation of a neighbourhood plan, members of the community can form a Neighbourhood Plan Group to take forward the development of a neighbourhood plan or Order. A group or organisation must apply to the local planning authority to be designated as a Neighbourhood Plan Group (a forum application). Those making a forum application must show how they have sought to comply with the conditions for Neighbourhood Plan Group designation. These are set out in section 61F (5) of the Town and Country Planning Act 1990 as applied to Neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004.

2.4 To be designated a Neighbourhood Plan Group must have a membership that includes a minimum of 21 individuals who either:

- live in the neighbourhood area
- work there; and/or
- are elected members for a local authority that includes all or part of the neighbourhood area

3. Neighbourhood Plan Area

3.1 The Neighbourhood Plan Area was designated by Bristol City Council on the 7th of November 2016. The neighbourhood area as defined follows the Hengrove and Whitchurch Park Ward boundary, and the neighbourhood area is also referred to as “the Ward”.

3.2 No part of the Neighbourhood Area overlaps any part of any other Neighbourhood Area (Section 61G (7) of the Act).

4. Plan Period

4.1 It is intended that the Hengrove and Whitchurch Park Neighbourhood Development Plan will cover the period 2017-2030.

5. Bristol City Council Assessment of the Plan under regulation 15 of the Neighbourhood Planning (General) Regulations 2017.

“5.1 Plan proposals and modification proposals

15.—(1) Where a qualifying body submits a plan proposal or a modification proposal to the local planning authority, it must include—

(a) a map or statement which identifies the area to which the proposed neighbourhood development plan relates;

(b) a consultation statement;

(c) the proposed neighbourhood development plan or neighbourhood development plan as proposed to be modified”; and

(d) a statement explaining how the proposed neighbourhood development plan meets the requirements of paragraph 8 of Schedule 4B to the 1990 Act or in the case of a modification proposal, how the neighbourhood development plan as proposed to be modified meets the requirements of paragraph 11 of Schedule A2 to the 2004 Act.

e) in relation to a modification proposal, a statement setting out the whether or not the qualifying body consider that the modifications contained in the modification proposal are so significant or substantial as to change the nature of the neighbourhood development plan which the modification proposal would modify, giving reasons for why the qualifying body is of this opinion.

(2) In this regulation “consultation statement” means a document which—

(a) contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan or neighbourhood development plan as proposed to be modified;

(b) explains how they were consulted;

(c) summarises the main issues and concerns raised by the persons consulted; and

(d) describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.”

5.2 Hengrove and Whitchurch Park Neighbourhood Plan Group, the qualifying body for preparing the Hengrove and Whitchurch Park Neighbourhood Development Plan, submitted it to Bristol City Council for consideration under Regulation 15. Bristol City Council has made an initial assessment of the submitted Hengrove and Whitchurch Park Neighbourhood Development Plan and the supporting documents and is satisfied that these comply with the specified criteria.

6. Site Visit

I carried out an unaccompanied site visit to familiarise myself with the Neighbourhood Plan Area on 5th July 2018.

7. Questions for Clarification

7.1 The expectation is that the examination of the issues by the examiner is to take the form of the consideration of the written representations. However, there are two circumstances when an examiner may consider it necessary to hold a hearing. These are where the examiner considers that it is necessary to ensure adequate examination of an issue or to ensure a person has a fair chance to put a case. Having read the plan and considered the representations I concluded that it was not necessary to hold a Hearing. However, I did require clarification from the Forum on the issue of Local green Space. My questions relating to this issue were published on the Bristol City Council website together with the response from the Forum. I have carefully considered the responses and representations taken them into consideration in my conclusions and made reference to them in my report in the relevant policy section.

8. The Consultation Process

8.1 The Hengrove and Whitchurch Park Neighbourhood Development Plan has been submitted for examination with a Consultation Statement which sets out the consultation process that has led to the production of the plan, as set out in the regulations in the Neighbourhood Planning (General) Regulations 2012.

8.2 The Statement describes the Forum's approach to consultation; the stages undertaken and explains how the Plan has been amended in relation to comments received. It is set out according to the requirements in Regulation 15.1.b of the Neighbourhood Planning (General) Regulations 2012):

(a) It contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan;

(b) It explains how they were consulted; (c) It summarises the main issues and concerns raised by the persons consulted; and

(d) It describes how these issues and concerns were considered and, where relevant, addressed in the proposed neighbourhood development plan.

8.3 Having examined the documents and considered the focus of the Neighbourhood Plan I conclude that the consultation process was robust, well conducted and recorded.

8.4 A list of statutory bodies consulted is included in the Consultation Statement.

9.Regulation 16 consultation by Bristol City Council and record of responses.

9.1 Bristol City Council placed the Hengrove and Whitchurch Park Neighbourhood Development Plan out for consultation under Regulation 16 from 11th May 2018 to 22nd June 2018.

9.2 A number of detailed representations were received during the consultation period and these were supplied by Bristol City Council as part of the supporting information for the examination process. I considered the representations, have taken them into account in my examination of the plan and referred to them where appropriate.

10. Compliance with the Basic Conditions

10.1 The Hengrove and Whitchurch Park Neighbourhood Plan Forum produced a Basic Conditions Statement. The purpose of this statement is to set out in some detail how the Neighbourhood Plan as submitted does meet the Basic Conditions. It is the Examiner's Role to take this document into consideration but also make take an independent view as to whether or not the assessment as submitted is correct.

10.2 I have to determine whether the Hengrove and Whitchurch Park Neighbourhood Development Plan:

- 1. Has regard to national policies and advice*
- 2. Contributes to sustainable development*
- 3. Is in general conformity with the strategic policies in the appropriate Development Plan*
- 4. Is not in breach and is otherwise compatible with EU obligations and Human Rights requirements.*

10.3 Documents brought to my attention by the Local Planning Authority for my examination include:

(i) Draft Hengrove and Whitchurch Park Neighbourhood Development Plan 2017-2030 (April 2018) the main document which includes policies developed in consultation with the community at various engagement events and workshops.

(ii) Hengrove Park Masterplan (November 2017)

(iii) Hengrove and Whitchurch Park Open Spaces Study (November 2017 updated May 2018)

(iv) A plan of the neighbourhood area

(v) Consultation statement for Hengrove and Whitchurch Park Neighbourhood Development Plan Draft (April 2018)

(vi) Hengrove and Whitchurch Park Neighbourhood Development Plan Basic Conditions Statement (April 2018)

(vii) Hengrove and Whitchurch Park Neighbourhood Plan Strategic Environmental Assessment/Habitat Regulations Assessment - Screening Determination

Comment on Documents submitted

4.10.4 I am satisfied having regard to these documents and other relevant documents, policies and legislation that the Hengrove and Whitchurch Park Neighbourhood Plan does, subject to the recommended modifications, meet the Basic Conditions.

11.Planning Policy

11.1. National Planning Policy

11.1.2 The National Planning Policy Framework (NPPF) 2012 sets out national policy, supporting this document is National Planning Policy Guidance(NPPG). The Government published its new National planning Policy Framework on 24 July 2018. Whilst the revised NPPF becomes a material consideration from the date of publication, paragraph 214 sets out a transitional period:

“214. The policies in the previous Framework will apply for the purpose of examining plans, where those plans are submitted(69) on or before 24 January 2019. Where such plans are withdrawn or otherwise do not proceed to become part of the development plan, the policies contained in this Framework will apply to any subsequent plan produced for the area concerned.

(69) For neighbourhood plans, ‘submission’ in this context means where a qualifying body submits a plan proposal to the local planning authority in accordance with regulation 15 of the Neighbourhood Planning (General) Regulations 2012.

During the transitional period for emerging plans submitted for examination (set out in paragraph 214), consistency should be tested against the previous Framework published in March 2012.”

Accordingly, my report has considered the Neighbourhood Plan on the basis of the 2012 NPPF and any paragraph numbers relate to that document.

11.1.3 To meet the Basic Conditions, the Plan must have “regard to national policy and advice”. In addition, the NPPF requires that a Neighbourhood Plan “must be in general conformity with the strategic policies of the local plan”. Paragraph 16 states that neighbourhoods should “develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development; plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan”.

11.1.4 The Hengrove and Whitchurch Park Neighbourhood Development Plan does not need to repeat these national policies, but to demonstrate it has taken them into account.

11.1.5 I have examined the Hengrove and Whitchurch Park Neighbourhood Development Plan and consider that, subject to modification, the plan does have “regard for National Policy and Advice” and therefore the Plan, subject to minor modification does meet the Basic Conditions in this respect.

11.2. Local Planning Policy- The Development Plan

11.2.1 Hengrove and Whitchurch Park is within the area covered by Bristol City Council. The current development plan for the Neighbourhood Plan Area is the Bristol Core Strategy (BCS) adopted in 2011 and the Site Allocations and Development Management Policies Local Plan (SADMLP) adopted 2014.

11.2.2 National planning policy states that the neighbourhood plan should support the strategic development needs set out in the Local Plan, plan positively to support local development and should not promote less development than set out in the Local Plan or undermine its strategic policies (see paragraph 16 and paragraph 184 of the National Planning Policy Framework). Nor should it be used to constrain the delivery of a strategic site allocated for development in the Local Plan.

11.2.3 Should there be a conflict between a policy in a neighbourhood plan and a policy in a Local Plan, section 38(5) of the Planning and Compulsory Purchase Act 2004 requires that the conflict must be resolved in favour of the policy, which is contained in the last document to become part of the development plan.

11.2.4 The distinction between strategic and non-strategic policies is important because of the relationship with Neighbourhood Plans. Neighbourhood Plans only have to be in general conformity with the strategic policies of the development plan (Localism Act 2011, Schedule 4B, s7 (2)(e) and National Planning Policy Framework 184). When made, neighbourhood plan policies take precedence over existing non-strategic policies in the local plan, where they

are in conflict.

11.2.5 Paragraph 156 of the National Planning Policy Framework states that strategic policies are those designed to deliver

- the homes and jobs needed in the area;*
- the provision of retail, leisure and other commercial development;*
- the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);*
- the provision of health, security, community and cultural infrastructure and other local facilities; and*
- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.*

11.2.6 Planning Policy Guidance paragraph 41-076-20140306 sets out that:

“Strategic policies will be different in each local planning authority area. When reaching a view on whether a policy is a strategic policy the following are useful considerations:

- whether the policy sets out an overarching direction or objective*
- whether the policy seeks to shape the broad characteristics of development*
- the scale at which the policy is intended to operate*
- whether the policy sets a framework for decisions on how competing priorities should be balanced*
- whether the policy sets a standard or other requirement that is essential to achieving the wider vision and aspirations in the Local Plan*
- in the case of site allocations, whether bringing the site forward is central to achieving the vision and aspirations of the Local Plan*
- whether the Local Plan identifies the policy as being strategic”*

11.2.7 The Basic Conditions Statement sets out the relevant strategic policies.

11.2.8 I am satisfied that subject to modification the Hengrove and Whitchurch Park Neighbourhood Plan is in general conformity with the Strategic Policies of the Bristol City

Local Plan.

12. Other Relevant Policy Considerations

12.1 European Convention on Human Rights (ECMR) and other European Union Obligations

12.1.1 As a 'local plan', the Neighbourhood Development Plan is required to take cognisance of the EU Strategic Environmental Assessment (SEA) Directive 2001/42/EC.

A Strategic Environmental Assessment (SEA) screening opinion was sought by Bristol City Council from the following organisations during the formal consultation period:

- Natural England
- Historic England
- Environment Agency

12.1.2 The screening decision was issued by Bristol City Council on the 29th March 2018. This advised that the Neighbourhood Plan did not require a Strategic Environmental Assessment or an Appropriate Assessment under the EU Habitats Regulations. The Determination stated that:

"The draft Hengrove and Whitchurch Park NDP is unlikely to give rise to significant environmental effects which would require Strategic Environmental Assessment, or have significant effects on European Designated Sites that would require consideration under the Habitats Directive. This determination has been arrived at in agreement with relevant statutory consultees."

12.2 Habitats Regulations Assessment

12.2.1 See paragraph 12.1.2

12.3 Sustainable development

12.3.1 A Sustainability Appraisal has not been undertaken but this is not a requirement for a Neighbourhood Plan. However, the Neighbourhood Plan has taken account of the need to contribute to the achievement of sustainable development and how this is achieved is set out in the Basic Conditions Statement. My conclusion is that the principles of Sustainable Development required in the NPPF have been taken into account in the development of the plan and its policies and where issues have been identified they were addressed by revisions to the document prior to submission. I am satisfied that the Hengrove and Whitchurch Park Neighbourhood Development Plan subject to the recommended modifications addresses the sustainability issues adequately.

12.3.2 *The Neighbourhood Development Plan is required to take cognisance of the European Convention of Human Rights and to comply with the Human Rights Act 1998.*

12.3.3 *I am satisfied that the Hengrove and Whitchurch Park Neighbourhood Development Plan has done so. I am therefore satisfied that the Hengrove and Whitchurch Park Neighbourhood Development Plan meets the basic conditions on EU obligations.*

12.4 Excluded development

12.4.1 *I am satisfied that the Hengrove and Whitchurch Park Neighbourhood Development Plan does not cover County matters (mineral extraction and waste development), nationally significant infrastructure such as highways and railways or other matters set out in Section 61K of the Town and Country Planning Act 1990.*

12.5 Development and use of land

12.5.1 *I am satisfied that the Hengrove and Whitchurch Park Neighbourhood Development Plan, subject to modification covers development and land use matters.*

12.6 The Neighbourhood Plan Vision, objectives and Policies

12.6.1 The Vision and Opportunity

“Hengrove and Whitchurch Park will have the best open space in South Bristol, drawing in visitors from other parts of the city. A re-modelled Hengrove Park will link into and be surrounded by innovative good quality new homes. The Park will provide a green canvas for outdoor activities that all ages and abilities can participate in. The local communities’ links and resources will be strengthened with new improved facilities including a clear central hub.”

12.6.2 Objectives:

- ***Increase the protection of valued open space and raise more open space to a ‘Good’ standard.***
- ***Develop the existing Hengrove Park site with quality new homes that interact well with the new Park and existing residential areas.***
- ***Create a high quality more formal Hengrove Park in line with the Bristol Local Plan.***
- ***Increase and improve the range of community facilities in the neighbourhood area to accommodate new and existing residents.***
- ***Get more people participating in outdoor sports and activities, including active travel and make connections with new and existing routes in the wider South Bristol area.***

- **Develop a new hub in the Park development and tie in existing commercial and leisure provision to create an urban form that connects around and across the Park.**
- **Provide a range of affordable housing types interspersed throughout the site.**
- **Work with existing businesses and community groups to strengthen the community and creative potential within it.**
- **Ensure the new Hengrove Park links to existing wildlife corridors in all directions to strengthen the ecological value of the area and provide clear recreational links between the new park and neighbouring areas.**
- **Provide formal sports pitches and changing facilities to encourage a more active population to set up and support local sports clubs.**

12.6.3 COMMENT

I am satisfied that vision objectives of the plan have been developed from the consultation process and the policies within the plan flow from the vision and objectives.

13. Hengrove and Whitchurch Park Neighbourhood Development Plan Policies

13.1 Neighbourhood Planning Guidance states:

“A neighbourhood plan should support the strategic development needs set out in the Local Plan and plan positively to support local development (as outlined in paragraph 16 of the National Planning Policy Framework).

A neighbourhood plan can be used to address the development and use of land. This is because if successful at examination and referendum the neighbourhood plan comes into force as part of the statutory development plan. Applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise (see section 38(6) of the Planning and Compulsory Purchase Act 2004).

Neighbourhood planning can inspire local people and businesses to consider other ways to improve their neighbourhood than through the development and use of land. They may identify specific action or policies to deliver these improvements. Wider community aspirations than those relating to development and use of land can be included in a neighbourhood plan, but actions dealing with non-land use matters should be clearly identifiable. For example, set out in a companion document or annex.

If the policies and proposals are to be implemented as the community intended a neighbourhood plan needs to be deliverable. The National Planning Policy Framework requires that the sites and the scale of development identified in a plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is

threatened.

A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.

The resulting draft neighbourhood plan must meet the basic conditions if it is to proceed. National planning policy states that it should support the strategic development needs set out in the Local Plan, plan positively to support local development and should not promote less development than set out in the Local Plan or undermine its strategic policies (see paragraph 16 and paragraph 184 of the National Planning Policy Framework). Nor should it be used to constrain the delivery of a strategic site allocated for development in the Local Plan.

Should there be a conflict between a policy in a neighbourhood plan and a policy in a Local Plan, section 38(5) of the Planning and Compulsory Purchase Act 2004 requires that the conflict must be resolved in favour of the policy, which is contained in the last document to become part of the development plan.”

For ease of reference, in this section the proposed Hengrove and Whitchurch Park Neighbourhood Plan policies are in black, my comments and any proposed modifications are in blue.

13.2 General Comments

13.2.1 In order to provide clarity and to ensure that the policies in the Hengrove and Whitchurch Park Neighbourhood Plan meet the Basic Conditions it has been necessary for me to make modifications to a number of policies and delete some parts of others.

13.2.2 Where modification has been made to a policy the supporting text/justification should be modified accordingly.

13.2.3 The original policies are in black, my comments in blue and modified policies in red.

13.3 Policies

13.3.1 Policy HWP1: A revitalised Hengrove Park

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:

- *Sports pitches for public use;*
- *Indoor changing facilities with showers and toilets as a minimum to replace existing facilities;*
- *A new scout hut with secure area around to replace the existing facility;*
- *Historic references to, and information on, the former airport and its' history;*
- *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;*
- *An expanded Children's Play Area with facilities for a wide range of ages, linking well into the rest of the Park;*
- *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;*
- *Formal Park attractions and planting as agreed;*
- *Tree-planting to improve areas of open woodland and replace loss of trees on site;*
- *Potential for an events space;*
- *Outdoor gym facilities;*
- *Improvement of the Mounds SNCI that respects the wildlife and biodiversity value of the site;*
- *Better green links between the Mounds and remodelled Hengrove Park.*

A management plan and ongoing maintenance funding should be required part of any

permission for the development of this site and Park.

13.3.2 COMMENT

Bristol City Council point out that bullet point 12 refers to an area that falls outside the site allocation and should be deleted from this policy.

Bullet point 12 should be deleted and the final paragraph of this policy includes wording which is not "policy". For clarity and to meet the Basic Conditions the final paragraph of the policy should be modified as follows:

A management plan ~~and ongoing maintenance funding should be~~ is required to be part of any permission for the development of this site and Park.

13.3.3 Policy HWP2: Linking Hengrove Park to wider Wildlife and Recreational Corridors

The remodelled Hengrove Park is to be developed as a connecting hub between existing recreational open space routes and surrounding wildlife corridors shown on Figure 10. Green space and varied habitats should link continuously across the Park from east to west and north to south and to recreational routes linking towards Brislington Brook, Pigeon House Stream and Bamfield and Briery Leaze SNCI as a minimum.

13.3.4 COMMENT

I have no comment on this policy.

13.3.5 Policy HWP3: Public Art, Creative Industry and Heritage Promotion

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 preserves the runway space and some of the previous setting. References to the airport heritage should also be incorporated into the wider Park and built environment: public art would do this well.

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.

Public Art projects for the Park and new built environment are encouraged in order that the profile of the new development is raised, and its distinctiveness and local character established.

13.3.6 COMMENT

The National Planning Policy Framework sets out how applications affecting designated and non-designated Heritage Assets should be considered:

“128. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

129. Local planning authorities should identify and assess the particular significance of any

heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal."

The policy as currently worded makes requirements beyond those made by the NPPF. In order to meet the Basic Conditions, the policy should be modified as follows:

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 has regard to the preservation of the runway space and its setting ~~preserves the runway space and some of the previous setting~~. References to the airport heritage should also be incorporated into the wider Park and built environment: public art would do this well.

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.

Public Art projects for the Park and new built environment are encouraged in order that the profile of the new development is raised, and its distinctiveness and local character established.

13.3.7 Policy HWP4: Open Space in Hengrove and Whitchurch Park

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:

Land between Copeland Drive and Wedgewood Close

Land between Allerton Road and Evercreech Road

Corner of Rookery Way and Court Farm Road

Land fronting Coulson's Road

St Giles Allotments

Oatlands Allotments and Severn Project

Hartcliffe Community Park Farm

Coulson's Park

Land fronting Belland Drive

Paddock Garden

Land fronting Cornhill Drive

Link between Fortfield Road and Kylross Avenue

Macey's Area off Bishport Avenue

Land fronting Allerton Crescent

Land off Wharnecliffe Gardens

Land fronting Tanorth Road

Land fronting Airport Road

Half Acre Allotments

Fortfield Road Allotments

Land off Smythe Croft

Hartcliffe Millennium Park

Land fronting Fortfield Road

Land fronting Whitchurch Lane

Staverdale Grove

Land off Totshill Drive

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.

13.3.8 COMMENT

Planning Policy Guidance states:

“Open space, which includes all open space of public value, can take many forms, from formal sports pitches to open areas within a development, linear corridors and country parks. It can provide health and recreation benefits to people living and working nearby; have an ecological value and contribute to green infrastructure (see National Planning Policy Framework paragraph 114), as well as being an important part of the landscape and setting of built development, and an important component in the achievement of sustainable development (see National Planning Policy Framework paragraphs 6-10).”

The National Planning Policy Framework, paragraph 74 states:

74. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.*

The neighbourhood planning process does not, in contrast to Local Green Space designation, enable the allocation or designation of public open spaces, more the identification existing spaces or the need for additional ones. Paragraph 74 sets out a clear policy process for assessment of whether or not the open space can be redeveloped.

The figure key for Figure 11 is confusing. For Open Spaces Figure 11 shows three different colours. Figure 11 should be modified to indicate clearly that although the open spaces indicated have different uses they are all considered as open spaces for the purposes of policy HWP4. They should be numbered. There are also some inconsistencies in the list .

Macey's Area off Bishport Avenue appears in the list but is shown on Figure 12 as a Local Green Space, it should be deleted from policy HWP4 and added to Policy HWP5. Land at Half Acre appears as an Open Space on Figure 11 but is not listed in policy HWP4. Hartcliffe Community Park Farm is identified as a Local Green Space on Fig 11 but appears in policy HWP4 and HWP5, it should be deleted from policy HWP4. Land Fronting Cornhill Drive is in the list in policy HWP4 and is indicated on Fig 11 but not 12 . For consistency it should also be shown on Fig 11.

13.3.9 Policy HWP5: Local Green Space

The following sites, shown on the Proposals Map (figure 11), are designated as Local Green Space:

- 1. Hengrove Farm Community Woodland*
- 2. St Augustine's Park*
- 3. Hartcliffe Community Park Farm*
- 4. The Mounds SNCI*
- 5. Hengrove Park Children's Area and Skate Park*
- 6. Whitchurch Green*
- 7. Hengrove Park (as remodelled in new development) and Green Fingers, St Giles Estate*

Development on Local Green Space will only be permitted if it enhances the use and reason for designation of the site or in other very special circumstances. Hengrove Park will be partially developed for residential use, but this will not impact on reasons to designate it due to policy requirements to retain a high-quality large park and make improvements to the existing park.

13.3.10 COMMENT

The key for Figure 11 is confusing. For Local Green Spaces Figure 11 shows Hengrove Park outlined by a broken red line but indicates Local Green Space as coloured in pale green. However, the list of proposed Local Green Spaces within policy HWP5 includes at 7. Hengrove Park (as remodelled in new development) together with Green Fingers, St Giles Estate.

Local Green Space designation is a "restrictive and significant policy designation" equivalent to Green Belt designation. It is essential that, when allocating Local Green Space, plan-makers can clearly demonstrate that the requirements for its allocation are met in full.

Paragraph 77 of the NPPF:

"The Local Green Space designation will not be appropriate for most green areas or open

space. The designation should only be used:

- *where the green space is in reasonably close proximity to the community it serves;*
- *where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquility or richness of its wildlife; and*
- *where the green area concerned is local in character and is not an extensive tract of land.*

In addition, the Local Green Space should be capable of enduring beyond the plan period and not be subject to a local plan allocation. Local Green Space designation will rarely be appropriate where the land has planning permission for development. Exceptions could be where the development would be compatible with the reasons for designation or where planning permission is no longer capable of being implemented.”

Given that the Framework is not ambiguous in stating that a Local Green Space designation is not appropriate for most green areas or open space, it is entirely reasonable to expect compelling evidence to demonstrate that any such allocation meets national policy requirements.

The list of areas put forward for designation as Local Green Spaces includes 7. Hengrove Park (as remodelled in new development) and Green Fingers, St Giles Estate. As with Figure 11 I will deal with this proposed designation as two separate areas. Firstly, I am satisfied that the Green Fingers, St.Giles Estate meets the tests set out in paragraph 77 and can be designated as a Local Green Space.

I have a number of concerns relating to the designation of Hengrove Park (as remodelled in new development):

- *The boundary of the proposed designation is not and cannot be clearly shown on a proposals map as the area does not currently exist.*
- *At approximately 30 Hectares , is it an extensive tract of land?*
- *Is the proposed designation in conflict with the site’s allocation as a site for strategic development within Bristol Core Strategy (policy BCS1) and the Bristol Site Allocation and Development Management Policies (SADMP) 2014.*

I am in no doubt that there is a need within the Neighbourhood Area for high quality open space/ park provision and that the area covered by the proposed designation is important to the local community.

To help clarify the issue for me I asked the Forum to clarify the position regarding the

proposed designation. The question asked, and the Forum's and Bristol City Council's responses are available to view in full on the Bristol city Council website.

My question was :

Policy HWP5: Local Green Space in Hengrove and Whitchurch Park includes the proposal to designate "7. Hengrove Park (as remodelled in new development) and Green Fingers, St Giles Estate."

In accordance with the NPPF it is clear that Local Green Space designation is intended to apply to existing spaces not proposed. Please can you clarify how you consider this allocation would meet the criteria and the Basic Conditions.

The Forum's response acknowledged that the proposed designation is "unusual" and agreed that "LGS designation cannot be applied to future green spaces" . The forum explains that, "the designation of Hengrove Park (as remodeled) is not designation of a future area of LGS, it is the designation of a key existing LGS, but one that the Forum acknowledges will become smaller."

The Forum's additional comments set out the policy background and their concerns.

I acknowledge that there is a lack of formal open space in south Bristol, that the neighbourhood area has no active outdoor space available to the general public and that the remaining Park at Hengrove will need to include provision for sports pitches, as well as remain a size that meets the Site Allocation and Development Management Local Plan requirement for a "large, high-quality Park".

The Forum also suggest a revised boundary for the Local Green Space. However, until the proposals for the site as a whole are resolved I do not see how a revised boundary can be established.

The protection for a Local green Space once designated is the same as that afforded to the Green belt. Whilst development is not precluded within the Green Belt inappropriate development should not be approved except in very special circumstances. Paragraph 89 of the NPPF states that:

"89. A local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this are:

- buildings for agriculture and forestry;*
- provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries,*

as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it;

- *the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;*
- *the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;*
- *limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan; or*
- *limited infilling or the partial or complete redevelopment of previously developed sites (brown field land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.”*

I consider that the regeneration proposals for the site as a whole are unlikely to be considered appropriate development on a Local Green Space and therefore it would not be appropriate to designate a site knowing that there is a strategic allocation in the Local Plan which could only be delivered by potentially developing parts of the designation.

Neighbourhood Plan Guidance addresses the issue of whether or not a neighbourhood area can include land allocated in the Local Plan as a strategic site?

“A neighbourhood area can include land allocated in a Local Plan as a strategic site. Where a proposed neighbourhood area includes such a site, those wishing to produce a neighbourhood plan or Order should discuss with the local planning authority the particular planning context and circumstances that may inform the local planning authority’s decision on the area it will designate.”

Paragraph: 036 Reference ID: 41-036-20140306

Revision date: 06 03 2014

Bristol City Council state in their regulation 16 response :

“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.

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. Remove estimated area figure for Local Green Space at Hengrove Park."

Following my question seeking clarification and the Forum's corresponding responses, Bristol City Council submitted the following:

"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 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. "

I have considered the position in regard to the inclusion of Hengrove Park (as remodelled in the new development) very carefully, taking into consideration the importance of the area to the community. My conclusion is that this element of the designation fails because :

- The boundary of the proposed designation is not and cannot be clearly shown on a proposals map as the area does not currently exist.*
- The proposed designation would be in conflict with the site's allocation as a site for strategic development within Bristol Core Strategy (policy BCS1) and the Bristol Site*

In order to meet the Basic Conditions designation 7 should be modified as follows:

7.Hengrove Park (as remodelled in new development) and Green Fingers, St Giles Estate

13.3.11 Policy HWP6: Sites of Local Wildlife Interest

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:

Tennis Courts Hartcliffe Campus Site

Brislington Brook

south of Airport road

Macey's Area south of Bishport Avenue

13.3.12 COMMENT

The sites of Local Wildlife Interest should be numbered for clarity.

13.3.13 Policy HWP7: Allotments

New residential development of 25 units or more will be required to provide allotment space of 100 sqm 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 and allotments in the neighbourhood area.

13.3.14 COMMENT

I have no comment on this policy

13.3.15 Policy HWP8: Residential development at Hengrove Park

The Layout of development on the Hengrove Park site should follow the five Masterplan Moves of the Hengrove Park Masterplan 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 new park and greatly increases the level of informal surveillance of the Park.

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. 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.

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.

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.

13.3.16 COMMENT

It is clear that the community has put a substantial amount of work in developing the Hengrove Masterplan 2017. However, concern has been raised that the requirement of this policy to strictly follow the “5 Masterplan Moves” is overly prescriptive and inflexible.

Bristol City Council’s Strategic Policy for the site is set out in the Local Plan Site Allocations and Development Management Policies Annex - Development Considerations for Hengrove Park - ref. BSA1401. This sets out what the development should include, with reference to the park it says:

Development should:

- take a coordinated approach to the delivery of this allocation and be guided by community involvement;*
- secure a large park, sufficient in size to accommodate areas of formal open space, sport pitches and the option of a large events space;*
- provide 0.175 hectares of allotments (the equivalent of 7 allotment plots) on the site;*

Paragraph 173 of the National Planning Policy Framework states:

“Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.”

I consider that the policy as currently worded would not provide the flexibility to ensure that the site can be delivered viably. For clarity and in order to meet the Basic Conditions the policy should be modified as follows:

The Layout of Development on the Hengrove Park site should follow the five Masterplan Moves of the Hengrove Park Masterplan where this is feasible and viable in order that a high-quality large park is created out of the existing Hengrove Park and ensure that the new residential development interacts well with the new park and greatly increases the level of informal surveillance of the Park.

Residential development should be of a density of 70 dph where this is feasible and viable 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. The Park footprint should where possible to be broadly as shown on the Masterplan, reproduced as Figure 5 in this Plan and available via the Appendix 1 link.

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.

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.

13.3.17 Policy HWP9: Provision of Housing for the Elderly

Three percent of new housing within residential developments of more than 40 dwellings should be designed to be wheelchair accessible as defined in the current edition of the wheelchair Housing Design guide. Provision to be proportional to the nearest whole number of dwellings.

13.3.18 COMMENT

I have no comment on this policy.

13.3.19 Policy HWP10: New Community Hub and protection of Community Facilities

*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. The 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. Proposals for uses that would aid self-sufficiency of funding and maintenance will be considered favourably.*

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.

13.3.20 COMMENT

I have no comment on this policy.

13.3.21 Policy HWP11: Extending GP Surgery Provision

The extension of GP surgery provision at the Whitchurch Health Centre is supported. Other proposals for new GP surgeries will be supported providing they comply with other policy in the Development Plan.

13.3.22 COMMENT

I have no comment on this policy.

13.3.23 Policy HWP12: Priorities for Community Infrastructure Levy Spending

Financial contributions from development to be spent in line with local community wishes will be allocated to community priorities agreed at the time by the Hengrove and Whitchurch Park Neighbourhood Planning Forum and other community bodies. They may include but not exclusively the projects listed below:-

- *The delivery of improved community facilities and a Community Hub;*
- *Support for a new health centre and GP surgery;*
- *General improvements to the open space and parks in the neighbourhood area;*
- *Improvements for cycling and walking facilities.*

13.3.24 COMMENT

This is not a policy and should either be moved to an annex or to the body of the text of the plan.

13.3.25 Policy HWP13: Promoting Sustainable and Active Travel

Development on the Hengrove Park Site should include charging points for electric vehicles and parking for personal cycles and the Bristol shared use cycles, spread around the site. A car club for residents both new and existing should operate from points within the site and other car-sharing schemes should also be encouraged.

Links to surrounding cycle routes and facilities should be strengthened and improved with any road crossings made safer with the provision of crossing facilities to suit predicted levels of motor vehicle traffic. Cycle and pedestrian links across the site should be direct, with a sealed surface and well lit, but not intrusively so.

13.3.26 COMMENT

I have no comment on this policy.

SECTION 5

Conclusion and Recommendations

5.1 I find that the Hengrove and Whitchurch Park Neighbourhood Development Plan has been prepared in accordance with the statutory requirements and processes set out in the Town and County Planning Act 1990 (as amended by the Localism Act 2011) and the subsequent Neighbourhood Planning (General) Regulations 2012.

5.2 The Neighbourhood Plan does not deal with County matters (mineral extraction and waste development), nationally significant infrastructure such as highways and railways or other matters set out in Section 61K of the Town and Country Planning Act 1990.

5.3 The Hengrove and Whitchurch Park Neighbourhood Plan does not relate to more than one Neighbourhood Area and there are no other Neighbourhood Development Plans in place within the Neighbourhood Area.

5.4 I am satisfied that the Hengrove and Whitchurch Park Neighbourhood Plan meets the Basic Conditions in respect of the EU obligations regarding Strategic Environmental Assessment and Habitats Regulation Assessment (HRA).

5.5 The policies and plans in the Hengrove and Whitchurch Park Neighbourhood Plan, subject to the recommended modifications would contribute to achieving sustainable development. They have regard to national policy and to guidance, and generally conform to the strategic policies of the Bristol Core Strategy (BCS) adopted in 2011 and the Site Allocations and Development Management Policies Local Plan (SADMLP) adopted 2014.

5.6 I therefore consider that the Hengrove and Whitchurch Park Neighbourhood Development Plan, subject to the recommended modifications can proceed to Referendum.

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4th September 2018

