

**14/12/2020**

## **Questions for Clarification Grove Park Neighbourhood Development Plan.**

I am Deborah McCann, the independent examiner of the Grove Park Neighbourhood Development Plan. I seek clarification on the following policy/supporting information. These questions are directed to the Qualifying Body.

### **Policy GI1: Protection and Enhancement of Grove Park's Green Spaces**

1. Grove Park's Green Spaces shall be protected and enhanced in accordance with their existing and proposed designation as well as their amenity and biodiversity value as defined in Table 3 (existing designations) and Table 14, illustrated by Figure 15 (additional designations).
2. Development that would result in the loss of any Green Spaces or Priority Habitats or cause harm to their character, setting, accessibility, connectivity, appearance, biodiversity or amenity value will not be permitted.
3. In the event of unavoidable loss, it must be demonstrated that this would be outweighed by the benefits of the development and proposals are required to:
  - i. Deliver compensation that is ecologically equivalent or enhanced in type, amount and condition of the habitat being lost insitu or within the same neighbourhood area to ensure no net loss across the neighbourhood.
  - ii. Demonstrate how biodiversity net-gain and connected ecological networks are being achieved in situ or local to the development through the creation or enhancement of existing or new wildlife habitats.

4. Development that results in a loss of tree canopy cover will not be permitted. Where development has to unavoidably remove tree canopy cover, replacement trees should be provided on a three to one ratio and should include a species that is of equal merit and maturity, or one that delivers enhanced habitat or, environmental benefits. All new tree planting should have an adequate root protection area to prevent future conflict with utility services and households.

5. Sites of Importance for Nature Conservation (Sydenham Cottages, Grove Park Nature Reserve, Willow Tree Nature Reserve, Burnt Ash Nature Reserve) shall be designated as Tranquil Spaces / Quiet Areas; development will not be permitted in the vicinity which would result in increased noise levels that would adversely impact these spaces.

## **QUESTION**

Policy GI1 paragraph 1 states “Grove Park’s Green Spaces shall be protected” and goes on to refer to Table 3 (existing designations) and Table 14, illustrated by Figure 15 (additional designations).

Is it the intention of the plan to designate any or all of the areas referred to as Local Green Spaces as defined in the NPPF? If so, please clarify that this is the case and provide details of the size and ownership of these areas together with evidence to confirm that the owners have been formally consulted and provide copies of any responses. I also need a map for each area showing the boundary at a scale that can be easily read. It is helpful to provide this information in a separate supporting document which encompasses all the proposed LGS designations and the supporting evidence.

## Policy GI2: Delivering the Linear Natural Parkland Nature Trail

(Railway Children Urban National Park)

1. Development proposals within the proposed Linear Natural Parkland Nature Trail and Sites of Importance for Nature Conservation will be refused.

2. Development should positively contribute to the development of the proposed Linear Natural Parkland Nature Trail (the Railway Children Urban National Park) as shown on Figure 8. This should achieve a continuous linear and connected ecological network that links together all the different green space / priority habitats and Sites of Importance for Nature Conservation, from the South Circular Road, through the Grove Park Neighbourhood Centre, and south towards Elmstead Woods through an improved town centre. Proposals will be required to demonstrate how the vision is being implemented, in particular to:

i. Protect, enhance and where necessary restore the ecologically diverse and priority habitats (Wet Meadow, Willow Woodland, Wet Woodland, Chalk Grassland, Mix-Deciduous Woodland, Pond, etc) along the nature trail in line with the community-led evolving proposals and spatial vision.

ii. Create, restore or enhance wildlife priority habitats and key missing Green Infrastructure connections onto the nature trail especially in areas identified as Nature Conservation Improvement Areas (Policy GI3) and the Neighbourhood Centre Regeneration Area (Policy NC2) connecting the trail to the wider neighbourhood.

iii. Provide improved, walkable, accessible and permeable pathways throughout the nature trail, as well as look at the feasibility of a cycle path.

iv. Improve gateways and access nodes into the Nature Trail to improve perceptions of safety and aid accessibility.

## **QUESTION**

Neighbourhood plans do have the power to designate Local Green Spaces but not to create an “Urban National Park”. Is it the intention of this policy to designate the area referred to as a Local Green Space?

The NPPF states:

“99. The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.

100. The Local Green Space designation should only be used where the green space is:

a) in reasonably close proximity to the community it serves;

b) 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), tranquillity or richness of its wildlife; and

c) local in character and is not an extensive tract of land.

101. Policies for managing development within a Local Green Space should be consistent with those for Green Belts.”

If the intention is to make this area a LGS designation the information detailed in my question above should be provided.

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