

Plymouth's Green Space Strategy 2008 – 2023 Consultation Draft

Summary of the consultation held in July and August 2008 and key changes made

Introduction

This summary report provides an overview of the comments made during the Green Space Strategy consultation undertaken during a six-week period from 1st July to 12th August 2008. Altogether, 20 comments were received from individuals and external organisations.

The consultation was launched at the City Council's 'Big Picture' event which was held over three days in the Guildhall (July 1st – 3rd).

Number of individuals/ organisations responding:

Individuals	8
Community/voluntary groups	5
Business sector/ landowners	4
Government agencies	3
Total	20

Some of the comments received were specific to particular actions or green spaces while others were more general. For this summary document the comments have been listed by the chapter that they relate to, with general comments about the Strategy listed at the beginning.

The key changes made to the Strategy as a result of the consultation are summarised by chapter and at the beginning of this summary.

Questionnaire Results

Seven individuals and two organisations answered the questionnaire. They were asked to express their views on the Green Space Strategy from 1 = strongly disagree to 5 = strongly agree.

The results are as follows –

Question	Number of responses				
	Strongly disagree	Disagree	Don't know	Agree	Strongly agree
Do you agree with the vision for green space set out in this strategy?			3	3	3
Do you agree with the objectives for green space set out in this strategy?			3	4	2
Do you agree that the local green space quantity standards set out in Actions GSS01, GSS03, GSS04 and GSS05 are appropriate for Plymouth?			4	2	2
Do you agree with Action GSS07 that everyone in Plymouth should have an accessible green space within 400m of where they live or work which is easy and safe to reach?	1		3	1	4
Do you agree with Action GSS09 to increase the standard of all 'local' green space to achieve a quality audit score of at least 'good' by 2021?			4	2	3
Do you agree with Action GSS06 to increase the number of 'City' green spaces in Plymouth and to create major new accessible green spaces in Northern and Eastern Plymouth?			3	1	5
Do you agree with Action GSS10 to increase the number of Plymouth's green spaces that achieve nationally recognised quality standards?			4	2	3
Do you agree with Actions GSS11 – GSS16 for the design and management of green spaces and play spaces so as to enhance their quality, safety, cleanliness and sustainability?			3	3	3
Do you agree with Action GSS17 to provide, protect and promote biodiversity within accessible green space?			4	3	2
Do you agree with Action GSS21 which sets out the considerations that will be taken when deciding on the priorities for green space investment?			4	4	1

Green Space Strategy Consultation Draft – Summary of consultation

Question	Number of responses				
	Strongly disagree	Disagree	Don't know	Agree	Strongly agree
Do you agree with Action GSS23 to deliver an integrated approach to the planning and management of accessible green space in the Plymouth sub-region?			3	2	4
Do you think that this Green Space Strategy gives clear guidance for decision-making relating to the planning and management of green space including determining planning applications relating to green space?			5	3	1
Do you think that this Green Space Strategy should be adopted as a Supplementary Planning Document within Plymouth's Local Development Framework?			3	0	6

The questionnaire responses received showed all of the actions were supported. Strongest support was given for the adoption of the Strategy as a Supplementary Planning Document and for Action GSS06 - to increase the number of 'City' green spaces in Plymouth and to create major new accessible green spaces in Northern and Eastern Plymouth.

General comments on the Green Space Strategy

The following general comments were received -

- The Strategy should include reference to blue space, as recreational use of Plymouth's sea and estuaries is as important as terrestrial sports and recreation.
- The Strategy is compliant with the Regional Spatial Strategy policy on green infrastructure (GI1).
- The strategically important greenscape areas that are not accessible shouldn't be overlooked.
- It is not always clear who will be responsible for implementing each of the actions. It needs to be clearer as to which actions are dependent on planning obligations for their delivery.
- The Strategy should include school grounds as it is vital that children are taught to respect their surroundings.
- The Strategy should only relate to land that is publicly owned.
- The sections on implementation are too repetitive.

Key changes made –

- The objectives have been renamed 'aims' and the 'actions' have been renamed 'objectives' throughout the Strategy to avoid confusion with the Green Space Action Plan.
- The sections on implementation have been removed as they are included within the Green Space Action Plan.
- References to blue space have been added in relation to the waterfront walkway (GSS05), access to nature (GSS16) and cross-border working (GSS21).

The following comments were also received about the status of the document:

- The more that green space is embedded in the Local Development Framework the greater will be the likelihood of effective delivery of sustainable development.
- The Strategy does provide a useful management structure for the planning and management of green space. However, it is more of a management document than a spatial policy document.

Key changes made –

- The Green Space Strategy has been taken forward as a corporate strategy. Despite support for making the strategy a Supplementary Planning Document, it was felt that, given that the document includes planning and management objectives and does not cover all green spaces in the city (such as publicly inaccessible spaces and most school grounds), a better approach was to embed the planning standards, objectives and actions into other Local Development Framework documents.
- In particular, the local standards of provision have informed the Planning Obligations and Affordable Housing Supplementary Planning Document; while the objectives relating to tackling deficiency, creating new green spaces and improving the quality of green space will inform the Sustainable Neighbourhoods Development Plan Document and the remaining Area Action Plans – the City Centre and University; Derriford/Seaton; the Hoe; East End and Plymouth’s Urban Fringe. These Development Plan Documents can also address proposals for individual green spaces.
- A separate Green Spaces Supplementary Planning Document will be prepared that will provide a set of data for both accessible and inaccessible green spaces in Plymouth that can be used as an evidence base for planning decisions. This will update the greenscape data, and will be informed by data that has been collected for this Green Space Strategy.

Chapter 1 – Introduction

The following comments were received -

- The Strategy's introduction does not refer sufficiently to corporate and national policy on climate change, sustainable development or to health and well-being, despite the fact that these are key themes within the Strategy.
- There is a need to include more links in Picture 1 to show how the Strategy relates to other corporate strategies – including the Local Transport Plan and the Cultural Strategy.
- The purpose and scope of the Strategy needs to be clearer – especially the relationship between the Strategy, which sets out the objectives and principles, and the Green Space Action Plan, which will set out projects that will contribute to delivery of the Strategy. Reference to Section 10, the Delivery Framework, is also needed.
- Since the Strategy is about 'accessible' green space then 'accessible' needs to be defined.
- The number of County Wildlife sites is 24 not 22.
- Is Central Park Plymouth's 'premier' park?

Key changes made –

- Reference has been made to climate change and health and well-being objectives in the Introduction.
- The purpose of the Strategy has been clarified.
- More links have been made to relevant Core Strategy policies - including to CS30 (Sport, Recreation and Children's Play Facilities).
- There is better clarification of which green spaces are covered by the Strategy.
- Links to the Sustainable Community Strategy, Local Transport Plan and the Cultural Strategy have been added to Figure 01.

Chapter 2 – Green Space Vision and Objectives

The following comments were received -

- The vision is misleading in referring to Plymouth's green spaces as 'natural' places but the rest of the vision is supported.
- The inclusion of 'headline statements' in paragraph 2.2 about what the vision means are not clearly related to the vision.
- Paragraph 2.2 should make reference to area visions and objectives in the Core Strategy relevant to green space.
- The vision should include a commitment to identifying green travel routes.
- The objectives currently include objectives for the Strategy and objectives for green space. This is confusing to the reader.
- The railway main line shown on the Strategy diagram looks more like a cycle path!
- The status of the diagram is not clear – are the accessible green spaces shown on the diagram definitive or indicative, and what is their planning status?
- Some of the accessible green spaces shown on the Strategy Diagram are fenced off and should not be included.
- The hierarchy of objectives, actions and targets is difficult to work out. The structure needs to be clearer.

Key changes made –

- The reference to 'natural places' in the vision has been removed.
- The number of objectives (now 'aims') has been reduced from 7 to 6. All now are aims for improving green spaces.
- The planning status of the Strategy Diagram has been clarified and the railway line has been labelled.
- The key outcomes have been placed after the vision and aims.

Chapter 3 – Plymouth’s Local Quantity Standards

The following comments were received -

- The standards proposed in relation to new development need to be better justified and explained. How will the standards in GSS01 (Plymouth’s accessible green space standard) be applied? How does the standard help to identify priorities for investment in different parts of the city? It cannot be applied as an absolute standard.
- The local/city split in GSS02 (provision of ‘local’ and ‘city’ green space) needs to be better justified. It is more important to get the overall provision right rather than having an arbitrary split.
- In relation to GSS03 (Plymouth’s play space standards) the 400m² minimum proposed size for an equipped play area is questioned as it will prevent the provision of Local Areas for Play (LAPs). There is a need for greater flexibility. There is a danger that small areas of green space cease to have a proper purpose.
- GSS05 (Plymouth’s allotment standard) requires more detail about how allotment provision will be improved.
- In relation to GSS06 (new ‘city’ spaces) there needs to be more detail about the proposed new city parks – how much of the land will be ‘accessible’?
- Would like to see a new ‘city’ green space in the City Centre
- The proposed park at Derriford isn’t sufficient to meet the needs of the north of Plymouth. Propose a linked green space along the waterfront at Ernesettle which would also strengthen the green space link to the Tamar Valley.
- The reference to ‘linked’ green spaces in paragraph 3.41 was strongly supported, and it was suggested that links could also be developed to encourage green routes for pedestrians and cyclists. Paragraph 3.41 could also refer to the coast and waterfront as a potential linked green/blue space.
- The coastal footpath could be extended by compulsory purchase of Millbay Pier to open it for public recreation.

Key changes made –

- The green space standard in GSS01 and its application to new development has been clarified by adding a section on ‘how this standard will be applied’.
- GSS02 has been removed. Instead, GSS01 includes a requirement for a good balance of green spaces serving local and city needs.
- GSS06 (now GSS05) has been expanded to include reference to the waterfront walkway, better walking/cycling links and to improve access to ‘city’ green spaces by public transport.

Chapter 4 – Improving Access to Green Space

The following comments were received -

- Access needs to be defined in paragraph 4.1 (to distinguish it from 'accessible').
- GSS07 (improving local access to green space) needs to state that all new developments need to provide access to green space within 400m of the development.
- Why is the GSS07 standard different to the one stated in the Core Strategy?
- Developers should not be asked to contribute towards addressing existing deficiencies in accessible green space.
- GSS07 (improving local access to green space) should recognise the varied needs and levels of mobility of users. Expressing distances in minutes doesn't take account of differing walking speeds.
- Action GSS08 (improving access to play) is supported.

Key changes made –

- A link has been made between Aim 2 and Aims 3 and 4 to highlight the Strategy's approach to access.
- GSS07 (now GSS06) has been clarified to distinguish between access requirements for new development and for existing development.

Chapter 5 – Promoting High Quality Green Spaces

The following comments were received -

- Action GSS09 (local quality standard) is supported but it is unclear how it will be funded.
- GSS10 (promoting excellent green spaces) should be about benefiting local people rather than aiming for nationally recognised quality standards.
- The city should aim to have as many Green Flag parks as possible.
- There is concern that planning obligations should not be used to fund existing deficiencies in green space quality.
- Action GSS14 (enhancing the experience of play) should include a reference to natural/free play as well as to equipped play to emphasise its importance.
- The commitment in GSS12 (management and cleanliness) to provide site-based staff is supported as a measure to improve safety and cleanliness.
- There must be adequate provision of public toilets in the more formal parks.
- There are other ways of dealing with anti-social behaviour apart from working with the police.

Key changes made –

- GSS14 has been altered to take into account the latest play guidance from Play England. It also now emphasises the importance of informal as well as formal play.
- Reference to the police in GSS12 (now GSS11) has been removed.

Chapter 6 – Contribution of Green Space to Health, Well-being and Biodiversity

The following comments were received -

- Action GSS15 (promoting sustainability within the Parks Service) needs to be set in the context of wider corporate measures being taken to tackle climate change.
- Action GSS16 (adapting to climate change) should include a reference to Strategic Flood Risk Assessment as green spaces are key to reducing surface water run-off.
- Action GSS17 (access to nature) could include a reference to blue space and to churchyards and cemeteries as wildlife havens.
- The Biodiversity Network needs to be explained.
- Action GSS18 (promoting the health benefits of green space) is strongly supported. There should also be a link to developing green routes for walking and cycling. There could also be a reference to the Public Rights of Way Strategy.
- Consideration needs to be given to improving rights of way through green spaces, properly marked and adopted by Plymouth City Council.
- Action GSS19 (the educational benefits of green space) is supported.

Key changes made –

- Reference has been added in GSS14 to the City Council's Carbon Management Programme.
- Reference has been added in GSS15 to Plymouth's Strategic Flood Risk Assessment.
- The Biodiversity Network is explained in GSS16.
- GSS16 has been broadened to include all green spaces, not just Local Nature Reserves. It also now includes reference to blue space as well as green space.
- A new objective (GSS17) has been added to highlight the importance of promoting walking and cycling in and between green spaces.

Chapter 7 – Informing Decision-making

The following comments were received -

- The priority list for investing in green space in Action GSS21 (informing investment in green space) and paragraph 7.9 is confusing. It needs to be worded more clearly.
- How were the priorities selected? Were other possibilities discarded?
- The western neighbourhoods of the city were all identified in the Neighbourhood Renewal Strategy as areas of multiple deprivation. Their needs should be prioritised.

Key changes made –

- This chapter has been removed. The principles have been incorporated into Chapter 1 (Introduction) and Chapter 9 (Delivering the Strategy). Chapter 9 explains the priorities more clearly.

Chapter 8 – Community Involvement

The following comments were received -

- Currently GSS22 (community involvement) as worded doesn't recognise the important work that local groups do.
- The involvement of the local community is important but will they be listened to?
- Specialist and community groups can make a valuable input into green space management.

Key changes made –

- The wording of objective (now aim) 5 and GSS20 (Community Involvement) has been changed from 'encourage' to 'support'.
- An acknowledgement has been made recognising the important work that community groups already do.

Chapter 9 – Realising the Potential of Plymouth’s Urban Fringe

The following comments were received -

- Action GSS23 (Cross-border green space planning) is supported. The development of green routes for walking and cycling would be welcomed.
- Access to the Tamar Valley is currently constrained. A waterfront park at Ernesettle would improve linkages and produce an area of regional significance.
- The focus on joint working with neighbouring authorities is welcomed.
- This section is important and needs to be integral to the Strategy.
- This section needs to be closely aligned with transport planning.

Key changes made –

- The wording of Objective (now Aim) 6 has been changed to reflect the outcome desired from cross-border working and to recognise blue as well as green space. Objective GSS21 also includes blue as well as green spaces.

Chapter 10 – Delivering the Strategy

The following comments were received -

- The range of partners referred to in paragraph 10.1 is not clear – who might be involved?
- The Delivery Framework table could include subheadings to make the link to the Strategy objectives clearer.
- There needs to be a clear link to the Action Plan. It is disappointing that the Action Plan was not available for consultation at the same time as the Strategy.
- Approve of regular monitoring of the Strategy.
- The Strategy needs to identify key stages in implementing the strategy – the timescale is too vague at present.

Key changes made –

- This section now includes the Green Space Action Plan.
- The Action Plan identifies short, medium and long-term priorities for green space improvements and will be updated every three years until the end of the Strategy period. It also shows how the Green Space Strategy will be embedded in the Local Development Framework.
- The Action Plan includes subheadings for each aim to make the links to the strategy clear.
- The range of partners is explained in paragraph 9.2.

Appendix 1 – Guidance for Planning Obligations

The following comment was received -

- This is welcomed. There should be a requirement to secure long-term maintenance of green spaces.

Key changes made –

- This appendix has been removed to avoid duplication with the Planning Obligations and Affordable Housing Supplementary Planning Document which has now been adopted as part of the Local Development Framework.