

Greenscape Strategy Update

for the City of Plymouth



Prepared for
Plymouth City Council
by
Land Use Consultants

Final Report
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I. PURPOSE OF THE STUDY

Introduction

- 1.1. Land Use Consultants was commissioned in 2003 to review and update a Greenscape Assessment undertaken for the City Council and Countryside Agency in 1999. To avoid confusion the present study will be referred to throughout this report as the “2003 study”, whilst the original survey will be called the 1999 Greenscape Assessment. The 1999 Greenscape Assessment provided the background and justification for the development of a new open land protection policy which was incorporated into the City of Plymouth Local Plan First Deposit December 2001; Policy 69. The 1999 Greenscape Assessment followed the principles set out in the Countryside Agency’s publication “Linking Town and Country” which advocated that every town or city should have a Greenscape strategy.
- 1.2. The 1999 Greenscape Assessment reviewed approximately 140 sites, however the number of sites identified in the First Deposit Local Plan exceeded the number and extent of sites considered as part of the study. The results of the Assessment were also “interpreted” during the process of policy development and a number of objections were received through the Local Plan process, both to designations not part of the initial survey and some which were surveyed.

Outline of the brief for the 2003 study

- 1.3. This study seeks to undertake the following tasks:
 - a) Review the methodology and robustness adopted for the original 1999 Greenscape Assessment in light of best practice and any changes in the recognised assessment guidance methodology subsequent to the publication of new Landscape Character Assessment Guidance issued by The Countryside Agency and Scottish Natural Heritage in 2002.
 - b) Review Greenscape Policy 69 used in the Local Plan First Deposit in terms of the principle of the approach and the formulation and presentation of the Policy as a tool to determine planning applications. During the review process consideration should be given to objections received in relation to Policy 69 and its formulation, made through the Local Plan process.
 - c) Review the application of Policy 69 in relation to sites identified in the Local Plan First Deposit, and which were originally surveyed, so that Annex 4 “The Greenscape Schedule” of the Local Plan First Deposit can be verified or amended in the light of the consultant’s professional opinion.
 - d) Survey all the sites which were not subject to individual site survey (in whole or part) in the original 1999 Greenscape Assessment, using the same methodology, (unless there is a general recommendation to amend the survey method resulting from an initial review of the 1999 Greenscape Assessment) and relate each newly surveyed site to the original Greenscape Assessment in order to maintain a

consistent approach between the original site surveys undertaken as part of the 1999 Greenscape Assessment and this update.

Subsequent changes to the brief

- 1.4. Following completion of an initial survey of 159 sites in June 2003, a further 35 sites were surveyed in March 2004. It was also agreed in January 2004 that Item C of the brief would be revised to undertake two elements of work; firstly to review and amend where necessary Policy 69 against objections made and secondly to review existing and emerging national guidance, making recommendations on the potential changes to the Policy.

Content of the report

- 1.5. The report responds to each of the tasks listed above under the following chapter headings:

- Chapter 2 Review of Methodology
 - Chapter 3 Review of Policy 69
 - Chapter 4 Review of Previously Surveyed Sites against Policy 69
 - Chapter 5 Sites Surveyed
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- Appendix 1: Bibliography
 - Appendix 2: Sites which received objections
 - Appendix 3: Sites which received representations
 - Appendix 4: Sites surveyed

2. REVIEW OF THE METHODOLOGY

Introduction

- 2.1. The methodology used for the previous 1999 Greenscape Assessment¹ was reviewed to assess its robustness in the light of best practice and any changes in the recognised landscape assessment guidance methodology as well as Quality of Life Capital (previously known as Environmental Capital) and the Devon's Landscape Character Assessment.

Objectives and Methodology of the 1999 Greenscape Assessment

- 2.2. The 1999 Greenscape Assessment was carried out in a number of stages reflecting the Interim Landscape Character Assessment Guidance² and utilising the then recently developed Environmental Capital Evaluation Technique³. The method of approach was broken down into six distinct stages:
1. **Defining the brief and scope of the study** – An analysis was undertaken of how the city and its green spaces have developed.
 2. **Desk study and field survey** - A survey of greenspaces in the city and its rural context was undertaken including both desk and field survey work which defined the city into distinctive character areas.
 3. **Determine the public's perception of and vision for the city's greenscape resources** through a series of consultations and preparation exercises including workshops, questionnaire and a web site.
 4. **Characterisation** - Issues raised through the desk study, field surveys and consultations were assimilated to define objectives of the city in the context of planning policy and the wider aims of the Greenscape Strategy. This resulted in the definition of local character areas covering the entire city and generic greenscape types within and on the edge of the city. Both the character areas and greenscape types informed two different areas of policy. Character areas identified relevant area specific policies with regard to greenscape deficiency and greenscape types helped in the application of city wide greenscape management priorities.
 5. **An evaluation of the greenspace resource** - Based on the findings of Stage 1 and 2, and through applying the Environmental Capital methodology, the benefits and services offered by each character area and greenscape types was assessed as areas of the City that are deficient or have poor access to green spaces were determined.

¹ Plymouth City Council (2000) Greenscape Assessment, Land Use Consultants

² Countryside Agency (1999) Interim Landscape Character Guidance, Land Use Consultants

³ Land Use Consultants and CAG (1998) What Matters and Why. Environmental Capital: A New Approach.

6. **Management Objectives** - Management objectives were defined to provide guidelines for the optimum management of the different greenspaces in the City. The objectives aimed to present a systematic and sound information base on the function, quality and management of green spaces, which can be used for the preparation and justification of Local Plan policies and proposals relating to the allocation and control of development from 1995 to 2011.

National Guidance on Landscape Character

- 2.3. Since the 2000 study the final version of the Landscape Character Assessment: Guidance for England and Scotland has been published⁴. The basic steps in the methodology are similar to the 2000 Greenscape Assessment and are as follows:
 1. **Defining the scope** – Familiarisation process.
 2. **Desk study** – Review of relevant literature, data and maps to identify areas of common character.
 3. **Field study** – Test and refine draft landscape character types and areas.
 4. **Classification and description** - Refine and finalise the output of the characterisation process by classifying the landscape into landscape character types and/or areas and mapping their extent.
 5. **Deciding the approach to judgements** - Define the approach and criteria, research other evidence and field observations.
 6. **Making the judgements** - This will vary according to the purpose of the assessment and could lead to landscape strategies, landscape guidelines, attaching status to landscapes and landscape capacity.
- 2.4. The finalised methodology echoes the Interim Guidance and therefore does not alter the methodology, or robustness, of the 1999 Greenscape Assessment. In addition, the 1999 Greenscape Assessment methodology included stakeholder involvement, which is advocated in the new guidance as well as using Environmental Capital as a tool to assist in determining a locality's sense of place and pinpointing why it differs from its neighbouring areas.

Quality of Life Capital

- 2.5. The evaluation of the greenspace resource was addressed using the 'Environmental Capital' process. This is now known as "Quality of Life Capital"⁵. The name change evolved because it was found that the approach is as valid for social and economic as for environmental benefits and as such supports the content of Government's Sustainable Development Strategy - A Better Quality of Life and Governments' drive to promote sustainable development. Whilst the previous report only applied to

⁴ Countryside Agency and Scottish Natural Heritage (2002) Landscape Character Assessment: Guidance for England and Scotland CAX 84

⁵ Countryside Agency, English Heritage, English Nature and the Environment Agency (2001) Quality of Life Capital: Managing environmental, social and economic benefits (Overview Report)

environmental quality rather than social and economic benefits, it can be argued that many factors relating to social and economics were considered as part of the desk top review and part of the public perception study.

- 2.6. Reference is made to the Plymouth Greenscape Assessment in the “Quality of Life” publication which cites the study as an example of how to use the tool in the development of land use strategies. The report states that “*the identification of areas of deficiencies, in particular greenscape types which relate in many cases to the identified benefits, offers a simple illustration of the distribution of particular assets around the City*” and helps focus policy preparation.
- 2.7. The guide to “Quality of Life Capital” therefore does not affect the results of the evaluation of the greenspace resource made in the 2000 assessment. However, to avoid confusion, the proposed Local Development Plan should replace the term “Environmental Capital” with “Quality of Life Capital”.

Local Guidance on Landscape Character

- 2.8. Devon County Council’s recent publication on landscape character throughout the county⁶ “is an update of an initial draft landscape strategy for consultation produced in 1994⁷. The initial strategy was reviewed as part of the previous study and described landscape quality according to a number of themes from which priorities were developed. The revised report replicates the format and content of the previous publication. Four points arise from the report which need to be considered in light of this new research:
 - emphasis on the importance of the Plym Valley and its surroundings as an Area of Great Landscape Value (AGLV). The Plym Valley AGLV should be based on a “*definable and recognisable landscape character*” Devon Structure Plan, 1999;
 - reiterates the importance of woodland in breaking up the visual impact of development within the city and forming an important feature to the north;
 - describes that some areas inland of the City have an “*overpowering regimented impact*” on their surrounding areas and which the natural valleys and ridges cannot always retain; and
 - highlights concerns over retaining the landscape integrity of the surrounding landscape which has suffered from the gradual erosion of landscape character through the neglect of hedgerows trees and agricultural land, piecemeal informal development, traffic, urban noise and light pollution.
- 2.9. Cornwall County Council’s Landscape Assessment (1994) by Landscape Design Associates was reviewed as part of the previous study. The Assessment has not been updated and as such is still valid.

⁶ Devon Landscape- An Appraisal of Devon’s landscape at the beginning of the 21st century by Devon County Council (2002)

⁷ The Devon Landscape – A Draft Strategy for Consultation, by Devon County Council, 1994

- 2.10. AONB Management Plans for the Tamar Valley AONB and South Devon are in the process of being finalised and will need to be considered in the preparation of the Local Development Plan.

Conclusion

- 2.11. The review concludes that:

- The final version of the Landscape Character Assessment Guidance is similar to the Interim guidance and as such does not alter the methodology or robustness of the 1999 Greenscape Assessment.
- The guide to “Quality of Life Capital’ does not affect the results of the evaluation of the greenspace resource made in the 2000 assessment.
- Findings from the forthcoming AONB Management Plans should be considered in the preparation of the Local Development Framework.
- Recommendations in light of Devon County Council’s Landscape Character Assessment should be reflected in the site surveys.

3. REVIEW OF POLICY 69

Introduction

3.1. This chapter reviews a number of existing and emerging policy documents which has been published subsequent to the 1999 Greenscape Assessment and assesses the implications of such changes on Policy 69 in the Local Plan, First Deposit. The documents reviewed are listed below and are ranked according to relevance:

- PPG 17 Planning for Open Space, Sport and Recreation
- Draft PPS12 Local Development Frameworks
- PPG7 The Countryside
- Draft PPS7 Sustainable Development in Rural Areas

In addition to the review of national guidance, this section assesses specific objections to Policy 69 and suggests where necessary alterations to the Policy should be made.

National changes in guidance

3.2. The implications of existing and emerging guidance in relation to Policy 69 are considered, and a number of amendments to the policy are proposed in light of forthcoming changes to the Development Plan Process.

PPG 17 Planning for open space, sport and recreation

- 3.3. PPG17 Planning for open space, sport and recreation replaces PPG Note 17, 1991. The PPG recommends that local authorities should undertake “*audits of existing open space, sports and recreational facilities*”, set local standards and maintain adequate supply and plan for new open spaces and in doing so considers local community needs.
- 3.4. The Guidance states that the assessments, which must be undertaken at a district level, must be robust and “*as a minimum should cover the differing and distinctive needs of the population for open space and built sports and recreational facilities*”. The quantitative and qualitative elements of open space, sports and recreational facilities must be considered in order to identify deficits or surpluses in order to determine how much new provision is required. The PPG states that “*existing open space, sports and recreational buildings and land should not be built on unless an assessment has been undertaken which has clearly shown the open space or the buildings and land are surplus to requirements*” and that all the functions that open space can perform are considered.
- 3.5. The statement goes to state that “*open space and sports and recreational facilities that are of high quality, or of particular value to a local community, should be recognised and given protection by local authorities through appropriate policies in the plan*”. Such spaces may be important for local amenity, used as a community resource, of benefit to wildlife and biodiversity. Consideration should be given to whether such a space can be substituted for another, in particular where there is a deficit. Any changes must explore opportunities to achieve qualitative improvements. The Guidance goes on to

state that parks, recreation grounds, playing fields and allotments must not be regarded as “previously developed land” and “its existence and potential value for recreation and other purposes properly assessed” must be assessed prior to development being considered. In addition, open space “should not be built on unless an assessment has been undertaken which has clearly shown the open space or the building and land to be surplus to requirements” considering all the functions that open space can perform.

- 3.6. The Guidance emphasises that open space standards must be set locally based on an “assessment of new and audits of existing facilities” adding that standards should be included within development plans.

Developments within open space and enhancing existing open space and sport and recreational facilities:

- 3.7. The Guidance states that recreational quality can be eroded by insensitive development or incremental loss of the site. Local authorities should consider the benefits that a space has to offer to the community against the loss of open space if development was to occur. Specifically authorities should consider erosion of its recreational function, ensure spaces do not suffer from increased overlooking traffic flows or other encroachment, protect rights of way that may benefit from open space and consider impact on biodiversity and nature conservation.
- 3.8. Local authorities should be reminded that where existing land and facilities are of poor quality or underused may not indicate “an absence of need”, and as such authorities should consider promoting the compatibility of uses with adjoining land uses, improve accessibility considering mobility needs and promote increased use through good design.

Open space:

- 3.9. In planning for new open space and assessing planning applications, authorities should seek opportunities to improve the local open space network, create public open space from vacant land and incorporate open space within new development as well as considering the use of land unsuitable for development

Urban fringe:

- 3.10. The Guidance recognises the importance of countryside around towns for sport and recreation, in particular “where there is an absence of land in urban areas to meet provision”. In addition authorities should encourage the creation of sports and recreational facilities in such areas and develop areas of managed countryside such as country parks, community forests and agricultural showgrounds, considering appropriate alternative modes of transport.
- 3.11. Due consideration will be given to development in or near SSSI and nationally protected landscapes, in the case of the former if potentially damaging impacts are prevented and in relation to AONBs where their impact in particular of noisy or intrusive activities is minimal.

- 3.12. Other sections of the guidance refer to playing fields, new open space and facilities, mixed use sports and stadia and major development. The Guidance also emphasises the multi functions that open space offers covering strategic functions, urban quality, health and well being, nature conservation, community resource and visual amenity.

**Draft Planning Policy Statement 12 Local Development Frameworks,
October 2003 ODPM**

- 3.13. The City Council is now preparing a Local Development Framework, rather than a second deposit Local Plan. Work from the First Deposit Local Plan will inform the Local Development Framework. This section briefly reviews the Draft PPS 12 Local Development Frameworks, October 2003 and ascertains whether Policy 69 should be altered to conform to a Local Development Framework.
- 3.14. A Local Development Framework will include a core strategy or vision, site-specific allocations of land (for specific or mixed uses), Action Area Plans (which if required will provide a planning framework for areas of change and areas of conservation) and a Proposals Map. The emphasis of the Plans will be on:
- Identifying inter-dependencies, cross boundary linkages and local diversity and distinctiveness;
 - Providing an agreed vision for the area; and
 - Giving expression to community strategies and other non-planning strategies and programmes.
- 3.15. Although specific reference to the protection of open space is not covered in the Draft PPGS 12, the guidance does indicate that references should be made throughout all of the Development Plan Documents to protecting areas susceptible to change:
- The core strategy needs to define the broad *“locations for delivering the housing and other strategic development needs such as employment, retail, leisure, community and transport development”*;
 - Site specific allocations should either refer to specific proposals or *“where site specific proposals are not possible criteria base policies should be used to set the framework for assessing any unforeseen proposals”*;
 - Area action plans should identify *“areas that are particularly sensitive to change or development”*; and
 - Proposal maps should include *“nationally designated areas”* and *“areas of more regional or local importance for biodiversity and where biodiversity will be enhanced e.g. through the use of planning obligations”*.
- 3.16. We consider that Policy 69, a criteria based policy subject to some amendments, will sit comfortably under site specific allocations of land linked to other development documents by an overarching vision statement and mapped proposals protecting greenspace sites.
- 3.17. Community involvement is critical to successful preparation and adoption of Local Development frameworks. Local Development Frameworks will act as the land use and development delivery mechanism for the objectives and policies set out in the

community strategy. PPS 12 – Annex B states that “Government wishes to develop effective linkages between community strategies and local development frameworks given that both are concerned with the achievement of sustainable development objectives”. As such community concerns over the protection of local greenspace should be balanced against those of developers.

PPG 7 The Countryside - Environmental Quality and Economic and Social Development (England) (1997) and Draft Planning Policy Statement (PPS 7) Sustainable Development in Rural Areas 2003

- 3.18. PPG7 Countryside is due to be replaced by PPS7. The changes between existing and emerging guidance are highlighted and the potential implications to Policy 69 discussed under the following headings:

Local landscape designations

- 3.19. PPG 7 states that local designations should carry less weight and development plans should not apply the same policies to them as many “*restrict acceptable development and economic activity without identifying the particular features of the local countryside which need to be respected or enhanced*”. The Guidance goes on to state that local authorities should only maintain or extend local countryside designations where there is good reason, explaining what it is that requires additional protection and why, and when plans are reviewed consider the “*function and justification of assessment of the qualities of the countryside, or the contributions of sites such as strategic gaps or green wedges to urban forms and urban areas*”. In order to accommodate development, PPG7 adds that the countryside character approach should assist in facilitating the “*necessary change without sacrificing local character*” adding context to the importance of local character and informing local assessments.
- 3.20. PPS 7 proposes to go further than PPG7, recommending that local authorities should remove any existing designations and adopt criteria based policies in development plans for the location and design of rural development through their area. Although not mentioned in the Guidance, it is perceived that these local designations are often used to form buffer zones between nationally protected landscapes and the remaining undesignated countryside in order to protect the setting of National Parks and AONBs.

Countryside surrounding cities and towns

- 3.21. PPG7 states that “*land use conflicts and environmental problems are evidenced in areas of “urban fringe” around some conurbations*”, adding that within such fringe locations neighbourly functions are often accommodated as well as agricultural land and woodland, plus vacant and under-used land. The guidance emphasises that within such areas there is a need to secure “*environmental improvement and beneficial use of land, reducing conflicts between neighbouring land uses, improving public access and catering for appropriate leisure and recreation facilities so as to reduce pressure on the wider countryside and reduce the need to travel*”.
- 3.22. PPS7, whilst supporting the objectives outlined in PPG7, also seeks to ensure that countryside adjacent to urban areas is recognised as important for those who live

and work there, as well as providing the nearest and most accessible countryside to urban residents. In addition it recommends, in line with sustainable development principles, that *“large scale developments should be located in or near to towns or other services centres that are accessible by public transport, walking and cycling”*, with priority given to the reuse of previously used brownfield sites rather than the development of greenfield sites.

Protected Landscapes

- 3.23. PPG7 emphasises that the same weighting should be given to AONBs as to National Parks. Although AONBs differ to National Parks in that the promotion of recreation is not an objective, AONBs should *“meet the demand for recreation so far as that is consistent with the conservation of natural beauty and the needs of agriculture, forestry and other uses”*. The Guidance adds that policies and development control decisions affecting AONBs should favour the conservation of the natural beauty of the landscape.
- 3.24. PPS7 states that authorities should have regard to *“any areas that have been statutorily designated for their landscape, wildlife or historic qualities where greater priority should be given to restraint of potentially damaging development”*. The proposed guidance adds that in relation to the conservation of natural beauty of the landscape and countryside, greater weight should be given to planning policies and development control to National Parks and AONBs. In addition, the emerging guidance states that although major development should only occur in exceptional circumstances, there should be positive policies which support development which facilitates the economic and social well being of these designated areas and their communities.

Agricultural Land

- 3.25. PPG 7 states that limited weighting should be given to land which is of poor quality and less agricultural significance, compared to grade 1, 2 and 3a land, which should only be considered where land is unavailable or where lower grade land is of environmental value (be this a statutory landscape, wildlife, historic or archaeological designation). PPG7 adds that adverse environmental effects need to be mitigated.
- 3.26. PPS7 supports PPG7 adding that poorer quality land should be used for development in preference to that of a higher quality land *“except where this would be inconsistent with other sustainability considerations”* including *“biodiversity, the quality and character of the landscape, amenity value or heritage interest, accessibility to infrastructure, workforce and markets; maintaining viable communities and the protection of natural resources, including soil quality) when determining planning applications”*. PPS7 also makes specific reference to equine related activities, policies support enterprises whilst maintaining environmental quality and countryside character.

Findings

- 3.27. The following recommendations are proposed in light of emerging policy changes:
- **Local landscape designations:** Proposals outlined in PPS7 seek to remove local designations from the development plan process. Reference to Area of Great

Landscape Value should be omitted in line with proposals under PPS7, as discussed in previous paragraphs.

- **Countryside surrounding towns and cities:** PPS7 emphasises the importance of the surrounding environment for resident’s quality of life as well as its recreational and landscape importance for people living within the city.
- **Protected landscapes:** PPS7 places a stronger emphasis on development which supports the economic and social well being of communities living within AONBs.
- **Agricultural land:** Whilst both existing and proposed guidance are similar, PPS7 emphasises the need to consider other sustainability issues and supports equine activities where the environmental quality of the countryside is not eroded.
- **Local Development Frameworks:** Local Development Frameworks place a strong emphasis on community involvement. Areas sensitive to change should be protected and evaluated against criteria based policies.
- **PPG17:** It would be beneficial to include under Appendix 4 a brief explanation in line with PPG17 of what is meant by the term “visual amenity”. PPG17 defines visual amenity as “even without public access, people enjoy having open space near to them to provide an outlook, variety in the urban scene, or as a positive element in the landscape.”

Specific Objections to Policy 69/Criteria

3.28. The second element of this part of the research reviewed Policy 69 and accompanying Annex 4 of the Local Plan against a number of objections which are outlined in Table 3.1 below. A brief response was made in support of or against the Policy justifying the reasons for the decision. Each of the objections was assessed in light of national guidance.

Table 3.1 Objections to Policy 69

Objections to Policy 69 (from Summary of General and Policy Representations, December 2002)		
Themes	Objections	LUC Response
Nature Conservation	<ul style="list-style-type: none"> • The policy is reactive. • Wildlife Management Plans should be required from all developments in Greenscape areas. • Proposals to extend to Local Nature Reserves have not been included. • Greenscape sites of substantive nature conservation should be shown on proposals maps. • Definition of “unacceptable loss” of wildlife interest sites should be clearer – Policy suggests that the loss 	<p>The Local Plan should make specific reference to local nature reserves (if these exist) and outline that under PPG9 they are classified under the heading of regional/local importance along with non statutory nature conservation sites such as county wildlife sites and Sites of Importance for Nature Conservation.</p> <p>A general response to the term “unacceptable loss” is covered from para</p>

	of wildlife sites may be permitted if they are replaced – this is not always possible. (Devon Wildlife Trust).	3.27 onwards.
	<ul style="list-style-type: none"> • Grouping of issues under one policy designation should not occur. • Object to lack of clarity of definition of statutory and non statutory designated sites. • Designation causes confusion between a variety of issues (English Nature). 	Agree: Further clarification is required in Annex 4 as to the terms statutory and non statutory.
	<ul style="list-style-type: none"> • There should be an explicit reference to Policy 70 (European and national nature conservation sites) in the reason for this policy (Environment Agency). 	Agree: As the policy has made specific references to other policies, consistency needs to be achieved throughout and should include amongst others Policy 70, 71 and 75.
	<ul style="list-style-type: none"> • The Policy should be supported by a Biodiversity Action Plan. • Wildlife surveys should be published and it should be demonstrated how wildlife and the environment will be protected by developments (Individual). 	Agree: The City Council should refer to the County Biodiversity Action Plan.
Agriculture	<ul style="list-style-type: none"> • Criterion 8 should be amended to avoid loss of all agricultural land, as the lowest value is often the highest value for natural habitat (Environment Agency). 	The criteria needs to be expanded to state that when considering low value land other sustainability considerations such as biodiversity will be taken into account in accordance with PPG7.
Diversification	<ul style="list-style-type: none"> • Criterion 8 should be amended to allow greater flexibility in relation to farm diversification. A form of words is suggested (Government Office South West). 	The criteria needs to be extended to emphasise the public value of allotments, community gardens and city (urban farms) as open space and their benefits to physical health and well being (see PPG17). In addition the criteria needs to state that other sustainability criteria (PPG7) will be considered when determining whether the loss will be unacceptable such as “ <i>the quality and character of the landscape, accessibility to infrastructure, workforce and markets; maintaining viable communities and the protection of natural resources, including soil quality</i> ” (PPS7).
Protected Landscapes	<ul style="list-style-type: none"> • The policy should refer to the South Devon AONB and the future adoption of a management plan for it (The Countryside Agency). 	Agree: Amendments to the policy should refer to both AONB Management Plans.

Conservation Areas	<ul style="list-style-type: none"> The decision making criteria within the policy that relates to the determination of whether or not a loss of greenscape is unacceptable are potentially harmful to the quality of conservation areas. The criteria in b and c should be amended to make greenescapes in conservation areas the exception to these criteria (Stoke Damerel Conservation Area). 	See detailed comments from para 3.27 onwards.
Alternative uses - development	<ul style="list-style-type: none"> The policy is restrictive in two ways. Some of the individual site designations cover large areas of land and the importance of functions varies across the site. The designation washes over all areas not allocated for other use or development and therefore restricts the role that some area or sites can contribute towards meeting the demands for housing. The policy designation does not recognise the need to consider urban extension in preference to new communities. This blanket designation does not facilitate negotiation of improved access to land currently in private ownership through development. The policy should be amended to take on these concerns. (Trustees of Cann Estate). 	See detailed comments from para 3.27 onwards.
	<ul style="list-style-type: none"> The criteria are unduly onerous and fail to recognise the development opportunities on under used land. A more flexible approach towards development on greenscape areas should be adopted (Plymouth Roman Catholic Dioceses Trust). 	Proposals to develop on under-used land must be balanced against the potential functions that the land has to offer. PPG17 states that although the land may be of poor quality and under used, its value to the community should not be overruled. Its potential function as an existing open space should be considered, e.g. offering links to other adjacent land uses, creating opportunities for access for all and increasing access through good design. Also see detailed comments from para 3.27 onwards.
	<ul style="list-style-type: none"> The policy designation attributes too great an importance to green spaces covered by it. Policy interpretation is too difficult. The policy is contrary to PPG7. The purpose of each greenscape site 	Disagree: The policy conforms to PPG7 and more importantly PPG17. The multi functionality of some sites will be weighed against the merits of siting development.

	<p>designation should be made clear.</p> <ul style="list-style-type: none"> • Partial development of a green space could secure greater public benefit. • The policy should be deleted in its entirety (Nathaniel Lichfield and Partners). 	
	<ul style="list-style-type: none"> • Developments have been permitted that do not meet the criteria set out in the policy (Individual). 	No response can be given.
	<ul style="list-style-type: none"> • The policy is non specific and fails to give clear guidance as to what may or may not be considered important to retain. • Areas that are protected from development should be clearly identified. (Midas Home Ltd). 	Disagree: See comments in para 3.34. Areas protected are identified under the Proposals Maps referring to Greenscape Areas.
	<ul style="list-style-type: none"> • The policy as drafted is unduly onerous. • The policy should be amended to reflect opportunities for development on greenscape sites (Individuals). 	Disagree. See comments in para 3.34
	<ul style="list-style-type: none"> • The criteria used to determine whether a loss of greenscape is unacceptable should include a reference to proportions of a greenscape designation that will be lost and retained and their relative values. A new criterion is suggested to address this (Individual). 	Disagree. The importance of the sites should be considered in its entirety. See para 3.27 for further comments.
	<ul style="list-style-type: none"> • The level of significance of the open space functions, in particular nature conservation, attributed to the greenscape site at the Southway Valley (site not 74) were reported to the relevant Area Committee. 	No comment.
	<ul style="list-style-type: none"> • Sites allocated with this designation should not be treated equally when implementing this policy. The site at Dunstone Wood No 375 should not be developed and its historical importance has not been properly recognised. Footpaths and hedgerows leading to sites 374 and 375 should be included in the greenscape area (Individual). 	Disagree: The multi functions that this site has to offer and its importance at all scales will be balanced against development proposals. See para 3.27 onwards for additional comments.

Recommendations

3.29. A number of recommendations arise from reviewing national guidance and objections in relation to Policy 69. Recommendations have been split into two headings; general comments and specific points of detail.

General Comments:

3.30. The principal objections from landowners, developers and individuals to Policy 69 are based on its restrictive nature discouraging development on greenscape sites. Criticisms, which are divided into “Issues of Principle” and “Points of Detail”, include the arguments that:

- **Issues of Principle:**

- The designation is applied to all areas not allocated for use or development and therefore it restricts the role that some areas of sites could contribute towards meeting demands for housing.
- The policy does not recognise the need to consider urban extension in preference to creating new communities.

- **Points of Detail:**

- Some individual sites cover large areas of land within which the importance of the various functions varies across the site.
- Blanket designation does not facilitate negotiation of improved access to land that is currently in private ownership through development.

3.31. It has also been argued by some conservation interests that the criteria employed to decide whether or not loss of greenscape is unacceptable could result in decisions that are potentially harmful to the quality of conservation areas. Specific concerns are raised by criteria b and c, which state:

“B In the case of formal or informal recreation facilities, whether the open space being lost is of low value to the community due to its poor quality, location or level of use and availability of other space that will adequately serve the needs of the community now and in the future.

C Whether an appropriate form of replacement provision of the greenscape functions, on or off site is proposed as part of the development.”

3.32. A response to all the detailed issues above is discussed in turn under “Issues of Principle” and “Points of Detail” but first, before these points are elaborated upon, it is appropriate to comment on the broad principles involved.

3.33. The Local Plan makes it clear that the City Council’s policies on open space provision and protection date back to the 1945 Plan for Plymouth and have been consistently applied since that time. The 1999 Greenscape Assessment brings the policy up to date and stresses that there are many reasons why it is important to retain greenspace within the city and avoid inappropriate encroachment of development. These reasons have been widely supported during public consultation on the Plan.

3.34. Contrary to views expressed by some objectors the policy itself does not prohibit development on greenscape sites. It simply makes clear that approval will only be granted if unacceptable loss to the functions and character of such sites is avoided.

Unacceptable loss can arise in a variety of ways and 8 separate categories are identified in Policy 69. These are unacceptable loss of:

1. Informal recreation facilities and allotments;
2. Playing fields or other organised sporting activity;
3. Wildlife habitat etc;
4. Visual quality;
5. Urban function;
6. Severance of pedestrian and cycle routes;
7. Historic or community cultural assets; and
8. Countryside or intrusion into the countryside.

(These categories have been paraphrased for clarity and the full text should be consulted to understand their individual significance).

- 3.35. From Land Use Consultants' perspective these categories of loss seem entirely appropriate as a basis for judging whether or not any development could be contemplated on greenspace land. It is also reasonable to assume that the balance of argument will normally weigh heavily against development both in principle (given the aims of the policy to protect greenspace for a multiplicity of valid purposes which are supported by the community as a whole), and because any development proposal would need to be of exceptionally high quality to satisfy the conditions or criteria.
- 3.36. Those who consider that the policy is unduly restrictive are concerned that it will prohibit development within the city boundaries and necessitate development of outlying areas, but the wording of the existing plan indicates that these issues have been addressed and that the City Council has allocated more than enough land already within the City Limits to meet Structure Plan requirements (page 11. part Two, The Strategy).
- 3.37. We are not in a position to form a view as to whether or not the housing allocations are adequate, but taking the planning strategy at face value there is no reason why additional land should be allocated for development from within the stock of available greenspace.
- 3.38. We would however wish to add that in reviewing Policy 69 it is imperative that the categories and criteria outlined under Policy 69 are consistent. Whilst there are categories which define where unacceptable loss cannot take place, these do not relate directly to the criteria determining unacceptable loss. The policy could be improved by ensuring that all references listed under the categories are covered under the criteria e.g. "b... whether the open space being lost is of low value to the community due to its poor quality, location or level of use, accessibility and availability of other space that will serve the needs of the community now and in the

future” or alternatively that the categories under the Policy link to other policies in the Plan. An example is category 2 “*An unacceptable loss of playing fields or other organised sporting activity, contrary to policies 61 (playing fields) and 63 (protection of indoor and outdoor sports facilities)*”.

- 3.39. Two additional points to be considered are that a reference should be included within the Policy to Quality of Life and explained further under Appendix 4 and that the criteria should be also promote accessibility, compatibility with other land used and increase use through good design as outlined in PPG 17. The Plan should emphasise that in considering greenspace sites an assessment of the City’s greenspace needs and opportunities was undertaken in line with the criteria detailed in PPG 17 Sport, Open Space and Recreation, which states that development plans need to be supported by:
- an assessment of “*quantitative elements (how much new provision is required)*”;
 - a qualitative component (*measure the need for enhancement of existing facilities*); and
 - accessibility (*distance thresholds and cost of using a facility*)”.

Issues of Principle:

- 3.40. In response to the points of detail raised above, the following comments are made:
- The designation is applied to all areas not allocated for use or development and therefore it restricts the role that some areas of sites could contribute towards meeting demands for housing: As referred to in previous paragraphs, the City Council has allocated sufficient land for Structure Plan requirements including housing. One decision arising from a jointly commissioned research project by the City Council and South Hams District Council was to accommodate additional houses outside the confines of the city, south east of Plymouth near Saltram Park. Whilst we have not been party to this decision, we can only assume that this decision was partly made based on the need to retain valued greenspace within the city centre and to conform with policies dating back to the 1945 Plan.
 - The policy does not recognise the need to consider urban extension in preference to creating new communities: This response has been covered by the comments above.

Points of Detail:

- 3.41. In response to the points of detail raised above, the following comments are made:
- “*Some individual sites cover large areas of land within which the importance of the various functions varies across the site*”: Agree This statement does not contradict the policy and the different parts of a multi functional site need to be weighted collectively against a development proposal for the reasons outlined previously.
 - “*Blanket designation does not facilitate negotiation of improved access to land that is currently in private ownership through development*”: The term blanket designation is

a misunderstanding on behalf of the respondent and there are opportunities to facilitate development where reasonable obligations are fulfilled through for example section 106 agreements.

- *“The criteria employed to decide whether or not loss of greenscape is unacceptable could result in decisions that are potentially harmful to the quality of conservation areas”*: The views of conservations are justifiable, however all policies in the Plan should be viewed as interrelated, and Policy 69 accompanied by Policy 75 Development in Conservation Areas should be strong enough to ensure that there is no development within conservation areas which undermines the local distinctiveness and integrity of the environment.

4. REVIEW OF APPLICATION OF POLICY AGAINST SITES

Introduction

- 4.1. This chapter responds to representations made in the Local Plan to specific site designations. Each site was assessed through a desk top study and where possible a site visit. This chapter should be read in conjunction with **Appendix 2** and **3** outlining and justifying the function and scale of importance of sites which were originally surveyed and which have received objections.
- 4.2. **Appendix 2** is a review of sites which received objections whilst **Appendix 3** is a review of the remaining sites (surveyed as part of the 2000 Greenscape Assessment) which either had representations in support of proposals or did not receive any representations. This Appendix reviewed the scale of importance of each function categorised under Policy 69 and Annex 4.
- 4.3. The commentary in both Appendices should be reviewed against the conclusions arising from a review of Policy 69 in Chapter 3.

5. APPRAISAL OF NEW SITES

Introduction

- 5.1. 160 additional sites were surveyed based on the original format of the 2000 Greenscape Assessment. All sites surveyed in June 2003 and March 2004 are included in **Appendix 4**. Comments on historic and culture value of the sites were incorporated onto the site survey sheets.

Appendix I Bibliography

Bibliography:

- City of Plymouth Local Plan, First Deposit, December 2001
- City of Plymouth Local Plan, First Deposit: Summary of General and Policy Representations December 2002
- Interim Landscape Character Guidance, Countryside Agency (1999)
- Landscape Character Assessment: Guidance for England and Scotland CAX 84, Countryside Agency and Scottish Natural Heritage (2002)
- Quality of Life Capital: Managing environmental, social and economic benefits (Overview Report)
- What Matters and Why. Environmental Capital: A New Approach, Land Use Consultants and CAG (1998)
- Greenscape Assessment, Land Use Consultants for Plymouth City Council (2000),
- Planning Policy Guidance Note 7: The Countryside – Environmental Quality and Economic and Social Development (England), 1997
- Planning Policy Statement 7: Sustainable Development in Rural Areas, 2003
- Planning Policy Guidance 17: Open space, sport and recreation, 2002, ODPM
- Draft Planning Policy Statement 12: Local Development Frameworks October 2003, ODPM

**Appendix 2:
Sites which received objections**

Appendix 2: Sites which have received objections

Site No	Reason for objection	EC – Function and Scale of importance (above city wide)	LUC response
030/N005	<ol style="list-style-type: none"> The site does not contain significant functions that merit its allocation as a 'greenscape' site. The functions which the site does demonstrate can be mitigated as part of the development of the site for residential purposes. (The Leverton Trust). 	Visual Amenity: City-wide.	<ol style="list-style-type: none"> Disagree. See detailed comments under chapter 3. In addition the site has a diverse range of woodland tree species and habitats, which are important for nature conservation interest. It is also attractive in terms of visual amenity, overlooked by housing with panoramic views of the Tamar bridges, river and countryside beyond, which merits a city-wide scale of importance. Footpaths crossing the site provide opportunities for informal recreation. Development on the site would mean the loss of valued woodland and/or pastureland.
032/N025	<ol style="list-style-type: none"> Residential development on part of the playing fields would be in keeping with the area The formal and informal recreational facilities can be retained and improved through development of part of the playing field. (Richard Walker Developments Ltd). 	Sport and Formal Recreation: City-wide.	1. & 2. - See comments associated with Chapter 3. In addition the site is a highly valued sports and formal recreation space, in an area with no equivalent spaces to serve this function. Development should be weighed against the site's important primary function and city-wide scale of importance.
044/S29		Sport & Formal Recreation: City-wide, Visual Amenity: City-wide,	There were no specific written representations for LUC to comment on.

		<p>Separation Buffer: City-wide,</p> <p>Historical/Cultural: Regional.</p> <p>The site is designated as a Loc.A&HS.</p>	
046/S28 & N002		<p>Informal Recreation: City-wide,</p> <p>Sport and Formal Recreation: City-wide,</p> <p>Separation/Buffer: City-wide,</p> <p>Access Corridors: City-wide.</p>	There were no specific written representations for LUC to comment on.
051/S12, S18 & S26		<p>Habitats and Species: City-wide,</p> <p>Visual Amenity: City-wide,</p> <p>Separation/Buffer: City-wide.</p>	There were no specific written representations for LUC to comment on.
063/S14		<p>Visual Amenity: National,</p> <p>Separation/Buffer: Regional.</p> <p>The site is within the Tamar Valley AONB.</p>	There were no specific written representations for LUC to comment on.
066/S9, S10, S11 & S12	<p>1. This small part of the large greenscape designation is not of the same quality and merit as the larger area. It could be developed for housing without giving rise to significant harm. (Trustees of the</p>	<p>Habitats and Species: City-wide,</p> <p>Visual Amenity: City-wide,</p> <p>Separation/ Buffer: City-wide.</p>	<p>1. & 2. - See comments under chapter 3: In addition although this part of the site has no functions above a city-wide scale of importance, as part of the larger greenspace corridor it would be sensitive to change. It is visually prominent and incremental development would erode the overall visual effect of the green</p>

	<p>Cann Estate).</p> <p>2. To maintain the high standards of care that currently exist at the care home, planning consent is required for sheltered housing. (Premiere Health – Mr Keith Briscoe).</p>	<p>Parts of the site are designated as a SLINC and Local Nature Reserve. The site abuts a SSSI and cSAC.</p>	<p>corridor which is reflective of proposals dating back to the 1945 Plan.</p>
070/S6	<p>1. The land has development potential to meet future housing needs and could form part of a mix of residential and community uses.</p> <p>2. The functions attributed to the site are incorrectly described and relate to an arbitrary administrative boundary. This does not reflect the true character of the area.</p> <p>3. Other functions can be accommodated in the development of the area.</p> <p>4. The site is well contained and would not have an adverse impact on a wider visual area, particularly the AONB to the north. (Trustees of the Cann Estate).</p>	<p>Visual Amenity: Regional, Separation/ Buffer: Regional, Access Corridors: City-wide.</p> <p>Part of the site is Community Woodland.</p>	<p>1. See comments under chapter 3: Any development on the site would be unlikely to be permitted due to the site's different functions above a city-wide scale. It acts as an important visual edge between urban development and the open countryside, and would be highly sensitive to change. This open space corridor reflects proposals dating back to the 1945 Plan of retaining open valleys and ridges.</p> <p>2. Disagree, the functions and scales of importance have been carefully considered and are an accurate reflection of the site's character.</p> <p>3. If development were to be permitted it would need to carefully consider against the site's visual prominence and intimate, small-scale pattern of land use and open space. It would be difficult for any development to avoid impacting on current site functions.</p> <p>4. Disagree, the site is visually prominent, and is overlooked by residential areas to the south. It is particularly visible from the AONB to the north, and any development would disrupt the soft edge the site provides between the urban form to the</p>

			south and the countryside and AONB to the north.
071/S7	<ol style="list-style-type: none"> 1. Land to the west of the Belliver Industrial Estate was identified in the previous adopted local plan for industrial development. The site is well contained and not of significant merit in relation to its attributed functions. 2. The land can make a valuable contribution to employment land needs and should be reallocated as employment land. (Trustees of the Cann Estate). 	<p>Habitats and Species: City-wide, Visual Amenity: City-wide, Separation/ Buffer: Regional.</p>	<ol style="list-style-type: none"> 1. See comments under chapter 3: The site is part of a wider green corridor (see 070 above) which provides a range of functions and is a key separation/buffer between the city and the open countryside immediately north. Incremental development within this area would erode its character and have a negative visual impact. 2. As stated under Policy 69, any potential development would need to have an overriding benefit to the local community to allow the loss of such a greenspace. Based on the site's multiple functions above a city-wide scale, any such development is unlikely to override the site's value as greenspace. This open space corridor reflects proposals dating back to the 1945 Plan of retaining open valleys and ridges.
074/S2	<ol style="list-style-type: none"> 1. The greenscape proposal will make the existing use of the land unworkable. The tree crop will die and as such be detrimental to the environment, local policies and other landowners. The proposal will bring about the loss of a forestry crop. (Mr Lippell). 2. None of the functions attributed to this greenscape designation are displayed on this site. 	<p>Habitats and Species: City-wide, Visual Amenity: City-wide, Separation/ Buffer: City-wide, Access Corridors: City-wide</p>	<ol style="list-style-type: none"> 1. See comments under chapter 3: Agree PCC should explore encouraging the management of existing forestry with landowners and realise benefits to the local economy. 2. Disagree, the functions and scales of importance were carefully considered and are an accurate reflection of the site's character. 3. This part of the site forms a green wedge between housing areas, breaking up the urban form and providing space for informal recreation. It is also important for nature conservation interest. The

	<p>3. The part of the site between the houses should be excluded from the greenscape designation.</p> <p>4. The part of the site to the rear of the housing could be included within the greenscape designation, subject to amendments to the functions attributed to the site. (Mr Andrew Philip Dart).</p>		<p>site therefore definitely meets the criteria of its greenscape designation. This corridor reflects proposals dating back to the 1945 Plan of retaining open valleys and ridges.</p> <p>4. No comment: The exact location to which the objection is referring to is unclear.</p>
086/N116	<p>1. The site cannot legally be used for informal recreation and does not form a separation/buffer between significantly different development. (Mr Lippell).</p>	<p>N/A. The site has no functions of city-wide importance or higher.</p>	<p>1. See comments under chapter 3. Disagree: This is a small site in the middle of a housing estate in Derriford. Its function as a separation/buffer is based on its location between different housing areas, with few other similar green spaces. There are long distance views through the housing to towards the AONB and Dartmoor to the north. It is used by local residents for informal recreation. We do not support this objection.</p>
090/N119		<p>N/A. The site has no functions of city-wide importance or higher.</p>	<p>There are no specific written representations objecting for LUC to comment on.</p>
091/N120		<p>N/A. The site has no functions of city-wide importance or higher.</p>	<p>There are no specific written representations objecting for LUC to comment on.</p>
098/N082	<p>1. The open space has development potential and should be either allocated or considered at a later date for residential development. (Nathaniel Lichfield & Partners).</p>	<p>Sport and Formal Recreation: City-wide, Access Corridors: City-wide.</p>	<p>1. See comments under chapter 3. Parts of the site are already under development for new housing. Some areas of the site with no specific land use or value could potentially be developed. Large developments would be undesirable given the site's location in an already densely developed area and the opportunities the space provides in terms</p>

			of its present functions should be weighed against future development proposals
103/N097	<ol style="list-style-type: none"> 1. The designation of this site as a greenscape area has been put forward without justification. A detailed assessment was undertaken for the suitability of this land for development. 2. Greenscape designation should be removed from the part of the site that has been subject to a planning application for residential development. (The Governing Body of Estover Community College). 	N/A. The site has no functions of city-wide importance or higher.	<ol style="list-style-type: none"> 1. & 2. - See comments under chapter 3. The site has multiple functions that merit its greenscape designation. As well as providing space for sport and formal recreation for the adjacent Community College, the site is highly visible and provides views to the surrounding districts. It also provides space for informal recreation and the hedgerows are important for nature conservation interest. The part of the site with housing proposals serves no specific function at present, apart from visual amenity. The site is integral to a larger landscape corridor, acting as a buffer between the urban fringes and wider countryside. Further incremental development will erode this wider open space corridor which reflects proposals dating back to the 1945 Plan of open valleys and ridges.
108/C9, C10, C11, C18 & NI28	<ol style="list-style-type: none"> 1. The Greenscape designation is too extensive, which is confusing and makes application of the policy uncertain. 2. The boundary of the designation with Proposal 72 at Derriford Hospital needs to be redefined. It is unduly restrictive to the area potentially available for development. The value of the designation does not outweigh the importance of the hospital's expansion to the community. 	<p>Habitats and Species: City-wide, Access Corridors: City-wide, Historical/Cultural: National.</p> <p>A SAM lies adjacent to the site. There is a Local Nature Reserve at Bircham Valley.</p>	<ol style="list-style-type: none"> 1. See comments under Chapter 3: 2.-4. - Disagree: This site is multi functional and of varying scales of scales of importance. All its functions must be weighed against any development proposals. The site forms a separation/buffer between land allocated for economic and social needs immediately north and west (Tamar Science Park, Derriford Hospital and Derriford Business Park), housing areas of Estover, Crownhill and Forder Valley Road, and the SAM at Bowden Battery. The site itself is visually prominent and parts are important for nature conservation interest and agriculture. Further incremental development will erode this wide open

	<p>(Derriford Hospital).</p> <p>3. Part of former Royal Marine Barracks, Seaton site should be allocated for residential development, and is identified in the Supplementary Planning Guidance for the former RMB Seaton as suitable for residential development.</p> <p>4. Development could take place without having an unacceptable impact on the character of the area and functions of the site. (Greenside Properties Ltd).</p>		<p>space corridor, which reflects proposals dating back to the 1945 Plan of open valleys and ridges. The site is an important “green lung” in a densely populated part of the city.</p>
111/T13	<p>1. Object to omission of employment land designation (12.8ha) (Midas Commercial Developments Ltd)</p> <p>2. The local plan should allocate sites like this for housing development, rather than new communities in the countryside.</p> <p>3. This land would constitute a Government policy compliant urban extension and be more sustainable than a new community.</p> <p>4. Other aspects of the proposal would include new roads to serve</p>	<p>Visual Amenity: City-wide, Separation/ Buffer: Regional, Historical/ Cultural: Regional, Countryside/ Food Growing: City-wide.</p> <p>There is an LHP&G at Boringdon (adjacent to the site to the north).</p>	<p>1. See comments under chapter 3: The exact location to which the objection is referring to is unclear and therefore not comment has been made</p> <p>2.-4. - This site has multiple functions of a city-wide importance or higher. Its designation and protection as greenspace is well justified. The site performs an important function of separation/buffer; softening the edge between the urban context and the surrounding open countryside. This function means that the site is particularly sensitive to any further urban expansion, thus the greenspace designation is particularly relevant. Further incremental development will erode this wider open space corridor which reflects proposals dating back to the 1945 Plan of open valleys</p>

	<p>this and other elements of the proposal and new community woodlands, all of which can be provided on land in the ownership of the objector. (Mr David Cobbold).</p>		<p>and ridges. Any development on the site is unlikely given its location on the edge of the city and its multiple important functions which merit its protection under Policy 69.</p>
145/E11	<ol style="list-style-type: none"> 1. The land holding including the kennels and veterinary surgery is developed in nature and does not form part of the park land, therefore it does not demonstrate any of the functions attributed to it under the greenscape policy. 2. The site should be excluded from the greenscape designation and included under a more appropriate general policy area designation, such as 'Mixed Use Area' (Mr K R Watson) 	<p>Informal Recreation: Regional,</p> <p>Sport and Formal Recreation: Regional,</p> <p>Visual Amenity: City-wide, Separation/ Buffer: City-wide,</p> <p>Access Corridors: City-wide,</p> <p>Historical/ Cultural: Regional.</p> <p>The site is a Local Historic Park and Garden (Central Park).</p>	<p>1. & 2. - Agree: The greenscape boundary should be reviewed in order to exclude developed areas with no relevant function(s) from the protection of Policy 69.</p>
154/N130	<ol style="list-style-type: none"> 1. The site already has planning consent for development of a dwelling house, and other development proposals are subject to current planning appeal. The site does not demonstrate the functions 	<p>Historical/ Cultural: City-wide.</p> <p>There is a Loc.A&HS designation for the site.</p>	<p>No comment – planning consent already given.</p>

	set out in the greenscape policy. This part of the site should be excluded from Greenscape designation 154. (Mr Stachan).		
157/C19		Visual Amenity: City-wide.	There are no specific written representations objecting for LUC to comment on.
167/E7, E8	<ol style="list-style-type: none"> 1. The characteristics, qualities, history and functions of the site do not merit its qualification for inclusion as a Greenscape site. 2. The site is appropriate for development of one dwelling without giving rise to harm. 3. Judgements on the site's development should be made against policy 25, the Established Residential Area designation. 4. The application of the Greenscape policy is too broad and it prejudices the otherwise suitable development of urban land 5. The criteria in Policy 69 used to judge unacceptable loss of Greenscape areas are too narrow. (Vauxhall Estates Ltd). 	<p>Habitats and Species: City-wide.</p> <p>The site is defined as a SLINC.</p>	1.-5. - See comments in chapter 3: In a densely developed urban area this is a valued greenspace, deserving of its designation. The young developing woodland on the majority of the site is considered of high nature conservation interest, as are its riverine habitats. It also forms a green edge to the A38 corridor, and as such also functions as a Separation/Buffer. Its high visibility means the site is also important for visual amenity. Further incremental development will erode this open space, which links with a wider open corridor and reflects proposals dating back to the 1945 Plan of open valleys and ridges. One dwelling would set a precedent for further incremental development over time gradually eroding its overall character.
172/E13	<ol style="list-style-type: none"> 1. The site does not perform any significant Greenscape functions, 	N/A The site has no functions above City-level.	1. & 2. - Agree, although any opportunities to develop the site should be weighed against the demand for

	<p>except for limited formal recreation, and is generally of little benefit in Greenscape terms.</p> <p>2. If part of the site were allocated for residential development, this would facilitate: the retention of the bowling facility; and new or improved publicly accessible recreational facilities (on or off-site) could be provided/improved, which would help address the low level of formal recreation facilities in this ward. (Plymouth & South West Co-operative).</p>		open space and recreation within the area.
185/N151	<p>1. The land south of Laira Emplacement, which is designated as forming part of the ERA, is of national archaeological and historic importance. Therefore, it should be designated as part of Greenscape site No. 185. (Ms L M Miller).</p> <p>This representation was also made by 50 other individuals.</p>	Historical/Cultural: National	1. Agree: PCC should consider extending the boundary of greenspace site 185 on the proposals map to run parallel with Military Road to the south.
197/T21	1. It is expected that the playing fields will become surplus to need and their prominent location at a gateway into the city should lead to guidance for their future use in the local plan.	Sport and Formal Recreation: City-wide.	1. & 2. - See comments under chapter 3: Opportunities for change should be weighed against the demand within the area for formal recreation facilities, which is currently high. It should also consider any development's affect on the site's visual amenity in light of the regionally important West Devon Way link/Plym Valley Way cycleway/footpath

	2. The site should be allocated for some form of development opportunity. (St Boniface College, The Board of Governors St Boniface College).		located to the west.
198/N101	1. Scrub land between the retail park and railway line possesses no functions of greenscape importance and should be deleted. Its inclusion undermines the credibility of other greenscape areas. (Plymouth & South West Co-operative).	N/A The site has no functions above City-level.	1. Although LUC agrees with this comment, the opportunities for the site in the future as a resource such as a recreational access corridor should be weighed against development proposals.
223/T2	1. The policy and designation are overly restrictive and prevent development in an area where it has already occurred. 2. The blanket designation is inappropriate and does not take into account local circumstance, is contrary to Government advice and sustainable development principles. (Prowting Projects Ltd – Mr Norman Kwan).	Habitats and Species: City-wide. The site is defined as a SLINC.	1. & 2. - See comments under chapter 3: This greenscape forms part of a wider belt of open space which forms a strong visual buffer and corridor of open space leading into the city. Gradual erosion of this corridor will detract from its visual and aesthetic integrity.
234/T18		N/A. The site has no functions of city-wide importance or higher.	There were no specific written representations for LUC to comment on.
242/T20		Historical/Cultural: National The site is a RHP&G.	There were no specific written representations objecting for LUC to comment on.
250/B10		Historical/Cultural: City-	There were no specific written representations for

		wide. There is a Loc.A&HS designation for the site.	LUC to comment on.
256/N052	1. The boundary of the greenscape designation should be amended to include the whole church area less the “footprint” of the church buildings. (Stoke Damerel Church Council – Mr J C Mitchelmore).	Historical/Cultural: City-wide. There is a Loc.A&HS designation for the site.	1. Agree. PCC should consider extending the boundaries of the site.
258/B9		Sport and Formal Recreation: City-wide, Historical/Cultural: Regional. There is a Loc.A&HS designation for the site.	There were no specific written representations for LUC to comment on.
267/P9	1. The site does not perform any significant ‘greenscape’ functions as identified in the plan. 2. The site is subject to serious and persistent problems of trespass by the local community who use this agricultural land for recreational purposes and thereby reducing to a significant degree its ability to be productively farmed. 3. The site offers an opportunity for residential development or an extension to the playing fields. (R D & P MacBean).	Separation/Buffer: City-wide. Part of the site is defined as a SLINC.	1.-3. - See comments under chapter 3: Disagree. The site is an important local greenspace serving a variety of functions. It provides space for informal recreation, parts of the site are important for nature conservation interest, and it acts as a key separation/buffer between surrounding housing areas as well as defining the urban fringe. Further incremental development will erode this space which forms part of a wider open space corridor wrapping round the southern n edge of the city. The space reflects proposals dating back to the 1945 Plan of open valleys and ridges.

270/P12	<ol style="list-style-type: none"> 1. The site is of little agricultural value due to its size. 2. The site is of little 'greenscape' merit due in part to its under use and untidy nature. 3. The site is well located to existing urban area and facilities and would be a good small development plot. 4. Part of the land should be re-designated as part of the ERA and part allocated for residential development. (Garand Properties – Mr A Drake) 5. The site does not have any special character or merit protection, and the designation is not appropriate. 6. The site is well related to the urban area and would make a good housing allocation. (Prowting Projects Ltd) 	<p>Visual Amenity: City-wide, Separation/Buffer: City-wide, Countryside/Food Growing: City-wide.</p>	<p>All - See comments under chapter 3:</p> <ol style="list-style-type: none"> 1. The agricultural land on the site softens the edge between the urban form immediately north and further agricultural land and open countryside immediately south. Although the site is not hugely significant in terms of agricultural production, it serves other additional greenscape functions: for visual amenity and as a separation/buffer. 2. Agree that some parts of the site are of an overgrown and underused nature, but this has meant that the site has become an important wildlife refuge – an additional greenscape function. 3. The site forms an important visual buffer, defining the urban boundary and acting as a green edge to further development. This function as a physical and visual break means that the site would be particularly sensitive to change such as further urban expansion. The space reflects proposals dating back to the 1945 Plan of open valleys and ridges <p>4.-6. - Based on its different site functions as greenscape (four out of five being above city-level) re-designation of the site as part of the ERA would be undesirable and unnecessary.</p>
314/R10	<ol style="list-style-type: none"> 1. The greenscape designation should be extended to include the whole of Drake's Reservoir. (Greenbank Community Association – Mrs Lynn 	<p>Historical/Cultural: City-wide.</p>	<p>No comment.</p>

	Fearon)		
318/R14	1. The greenscape designation on this site inhibits the potential for the realisation of the expansion of the NMA to develop proposals for the National Centre for Marine Science and Technology. (National Marine Aquarium – Mr Michael Leece).	Visual Amenity: City-wide. The site is defined as a SLINC.	1. See comments under chapter 3: Any future development on the site would need to be weighed against the importance of the site as greenspace, including its importance for nature conservation interest and as location enabling long distance views across to the historic waterfront.
330/R15		Informal Recreation: Regional, Habitats and Species: City-wide. The site is defined as a SLINC.	There were no specific written representations for LUC to comment on.
335/P35	1. The site is ideally suited to small scale residential development. 2. Development would not result in the extension of the village beyond its existing limits. 3. The areas of greenscape should be allocated for residential development. (Mr & Mrs R E Veale). 4. A small area of the greenscape designation has planning consent for conversion of barns to residential use. The site should be included in the ERA designation. (Mr & Mrs R E Veale).	Visual Amenity: City-wide, Separation/Buffer: City-wide.	1.-4. - See comments under chapter 3: Disagree. The site forms an integral part of the important backdrop and edge to the urban fringe of Hooe. The site is highly sensitive to development which would denude its open character. The space reflects proposals dating back to the 1945 Plan of open valleys and ridges and forms part of a larger open greenscape corridor running along the southern fringes of the city. Incremental erosion of this space will detract from its overall integrity.
338/PI3,	1. The site is not significant in	Visual Amenity: Regional,	See comments under chapter 3: Disagree strongly.

P27,P29, P33,P34	<p>landscape, open space or community terms. It should be allocated for residential development. (Midas Homes Ltd – Mr David Seaton).</p> <p>2. The designation includes the proposed extension to Moorcroft Quarry at Hazeldene, which already has planning permission.</p> <p>3. As this area will be quarried it is illogical to describe it as having regional visual amenity importance and as a separation/ buffer zone. (Aggregate Industries UK Ltd).</p>	<p>Separation/Buffer: Regional, Countryside/Food Growing: City-wide.</p>	<p>The site, which includes Saltram Park (a National Trust property), has a number of greenscape functions above a city-wide scale of importance. Any development would be highly undesirable.</p> <p>The exact location of new housing development in relation to these objections is uncertain and needs to be clarified.</p>
339/PII		N/A. The site has no functions of city-wide importance or higher.	There were no specific written representations for LUC to comment on.
340/P24, NI09	<p>1. The whole of this site is incorrectly identified as providing sporting and recreational function.</p> <p>2. There is no public access to part of the site.</p> <p>3. The site is inappropriately identified as possessing nationally important visual amenity. (Aggregate Industries UK Ltd)</p>	<p>Sport and Formal Recreation: City-wide, Habitats and Species: City-wide.</p> <p>The site is defined as a SLINC</p>	<p>1. & 2. - Agree, only part of the site provides facilities for sport and formal recreation. However, it is an important site function, and is therefore allocated to the site as a whole.</p> <p>3. This is a misunderstanding. The site is identified in the Local Plan as possessing visual amenity on a neighbourhood-wide scale.</p>
341/P25,P 32	1. The site is inappropriately identified as possessing nationally important	Habitats and Species: City-	See above. This is a misunderstanding. The site's function for visual amenity is on a neighbourhood -

	visual amenity. (Aggregate Industries UK Ltd)	wide. The site is defined as a SLINC.	wide scale.
342/N111	I. The site is inappropriately identified as possessing nationally important greenscape functions. (Aggregate Industries UK Ltd).	N/A. The site has no functions of city-wide importance or higher.	I. See comments for 341 and 340. These objections are based on confusion over the 'N' symbol in the Local Plan. This is for a neighbourhood not national scale of importance. (National is denoted as 'Nat').
343/P1,P2		Informal Recreation: Regional, Visual Amenity: Regional, Separation/Buffer: Regional, Access Corridors: National, Historical/Cultural: National. There is a SAM designation for this site.	There were no specific written representations for LUC to comment on.
346/P3,P6, P36		Sport and Formal Recreation: City-wide, Visual Amenity: Regional, Separation/Buffer: Regional, Access Corridors: Regional, Historical/Cultural: National. There is a Nat.A&HS designation for this site.	There were no specific written representations for LUC to comment on.
360/P18, P19	I. The designation does not go far enough. Additional land should be included within this designation to	Informal Recreation: City-wide, Habitats and Species: City-	I. Radford Quarry is covered by site 363.

	preserve the rural quality of the area. Include land at Hooe Lake Quarry (Mr Brian Cheal).	wide, Visual Amenity: City-wide, Access Corridors: Regional, Historical/Cultural: City-wide.	
361/P18		Informal Recreation: City-wide, Habitats and Species: City-wide, Visual Amenity: City-wide, Access Corridors: Regional, Historical/Cultural: City-wide.	There were no specific written representations for LUC to comment on.
363/P19	I. The designation does not go far enough. Additional land should be included within this designation to preserve the rural quality of the area. Include land at Radford Quarry. (Mr Brian Cheal).	Habitats and Species: City-wide The site is defined as a SLINC	I. Radford Quarry is included within the designation. Other surrounding land would not be suitable as greenspace, and is allocated under more relevant designations.
370/P4	I. The site does not merit greenscape designation as it does not display the functions identified in policy 69 or annex 4. (Persimmon Homes South West Limited – Mr Richard Ayre)	Habitats and Species: Regional, Visual Amenity: Regional, Separation/Buffer: Regional, Access Corridors: Regional.	I. See comments under chapter 3: Strongly disagree. The site possesses multiple greenscape functions, all on a regional scale of importance.
373/P14		N/A. The site has no functions of city-wide importance or higher.	There were no specific written representations for LUC to comment on.
374/P14	I. Delete greenscape allocation and replace with Established Residential	N/A. The site has no functions of city-wide importance or	I. See comments under chapter 3: We do not support this objection. The site, along with

	Area designation. (Mr R Larson).	higher, although LUC would like to see its function for visual amenity upgrading to city-level. Part of the site is a SLINC.	adjacent site 375, is important for its ecological value and due to its topography forms an important visual landmark within Plymstock, from the A38 and agricultural land outside the city boundary. The value that local residents place on this greenspace was highlighted through public participation exercises completed as part of the 2000 survey. The desire to protect the site generated the most comments compared to any other issue in the ward.
375/PI4	<ol style="list-style-type: none"> 1. The plan's recording of the woods functions does not give any recognition of the woods historical/cultural importance. (Mr Brian Troughton). 2. Support designation but concerned that the functions identified do not recognise the woods historic and cultural importance. (Mr Graham McAlpine). 	<p>Habitats and Species: City-wide,</p> <p>Visual Amenity: City-wide.</p>	<ol style="list-style-type: none"> 1. & 2. - If this function is verified PCC should consider adding a Historical/Cultural function for the site. The value of the woodland is reflected in the site's city-wide function for Habitats and Species.

Appendix 3

Sites previously surveyed which received representations

Appendix 3: Sites previously surveyed which received representations

Site No (LP/LUC)	EC – Function and Scale of importance (above city wide)	LUC response
001/B1	Function(s): Habitats and Species: City-wide. The site is designated as a SLINC and edges onto a cSAC.	This function has been reviewed and the proposed scale of importance should be retained.
004/B3	Function(s): Habitats and Species: City-wide. The site is designated as a SLINC.	This function has been reviewed and the proposed scale of importance should be retained.
006/B4	Function(s): Visual Amenity: City-wide.	This function has been reviewed and the proposed scale of importance should be retained.

008/N083	Function(s): Habitats and Species: City-wide, Access Corridors: City-wide, Historical/Cultural: City-wide.	The Historical/Cultural function of the site should have its scale of importance upgraded from a City-wide scale to a Regional scale. PCC's Sites and Monuments record states that the site is of regional historic importance. The two remaining site functions have been reviewed and their proposed scales of importance should be retained.
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013/B6	Function(s): Visual Amenity – City-wide, Historical/Cultural – City-wide. The site is designated as a Loc. A&HS	These functions have been reviewed and the proposed scales of importance should be retained.
015/B7	Function(s): Habitats and Species: City-wide. The site is defined as a SLINC.	This function has been reviewed and the proposed scale of importance should be retained.
025/F2	Function(s): Habitats and Species: City-wide.	This function has been reviewed and the proposed scale of importance should be retained.
026/F2	Function(s): Habitats and Species: City-wide.	This function has been reviewed and the proposed scale of importance should be retained.
027/S24	Function(s): Habitats and Species: City-wide, Visual Amenity: City-wide, Separation/Buffer: City-wide. The site is defined as Community Woodland.	These functions have been reviewed and the proposed scales of importance should be retained.

029/N004	Function(s): Informal Recreation: Regional, Visual Amenity: Regional, Separation/Buffer: City-wide, Historical/Cultural: National.	We would question the historical/cultural importance of this site, which is defined as of national importance. PCC's Sites and Monuments Record states that the features of interest lie outside the site boundary. We would recommend the downgrading of this function to regional level given its relationship with the Royal Albert Bridge, however this should be confirmed with PPCC
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		conservation office. The remaining functions have been reviewed and the proposed scales of importance should be retained.
030/N005	Function(s): Visual Amenity: City-wide.	This function has been reviewed and the proposed scale of importance should be retained.
032/N025	Function(s): Sport and Formal Recreation: City-wide.	This function has been reviewed and the proposed scale of importance should be retained.
033/F6	Function(s): Habitats and Species: City-wide.	This function has been reviewed and the proposed scale of importance should be retained.
034/B8	Function(s): Historical/Cultural: National. The site is designated as a LHP&G and Nat.A&HS.	This function has been reviewed and the proposed scales of importance should be retained.

037/F7	Function(s): Informal Recreation: District-wide, Habitats and Species: City-wide, Visual Amenity: City-wide, Separation/Buffer: City-wide.	These functions have been reviewed and the proposed scales of importance should be retained. We recommend the upgrading of the scale of importance from District to City based on the visibility of the site from the A38 and elsewhere.
040/N009	Function(s): Sport and Formal Recreation: City-wide.	This function has been reviewed and the proposed scale of importance should be

		retained.
043/N003	<p>Function(s): Visual Amenity: Regional, Separation/Buffer: City-wide, Historical/Cultural: National, Countryside/Food Growing: City-wide.</p> <p>The site has the following designations: SAM and Nat.A&HS.</p>	These functions have been reviewed and the proposed scales of importance should be retained.
044/S29	<p>Function(s): Sport & Formal Recreation: City-wide, Visual Amenity: City-wide, Separation Buffer: City-wide, Historical/Cultural: Regional.</p> <p>The site is designated as a Loc.A&HS.</p>	We would question the omission in the Local Plan's Greenscape Schedule of the site's function for Countryside/Food Growing (City-wide). The majority of the site is agricultural land. We were also unaware of the presence of a Locally Important Unscheduled Archaeological & Historic site – this needs to be verified with PPC conservation officer. The other functions and scales of importance for the site should be retained.
045/S30	<p>Function(s): Habitats and Species: City-wide.</p> <p>The site is defined as a SLINC.</p>	This function has been reviewed and the proposed scale of importance should be retained.

046/S28 & N002	<p>Function(s): Informal Recreation: City-wide, Sport and Formal Recreation: City-wide, Separation/Buffer: City-wide, Access Corridors: City-wide.</p>	These functions have been reviewed and the proposed scales of importance should be retained.
047/S26	<p>Function(s): Informal Recreation: City-wide, Habitats and Species: City-wide, Visual Amenity: City-wide, Separation/Buffer: City-wide.</p>	These functions have been reviewed and the proposed scales of importance should be retained.
048/S26	<p>Function(s): Visual Amenity: City-wide, Separation/Buffer: City-wide, Historical/Cultural: City-wide.</p>	These functions have been reviewed and the proposed scales of importance should be

	There is a Loc.A&HS on this site.	retained.
049/S18	Function(s): Habitats and Species: Regional, Visual Amenity: City-wide, Separation/Buffer: City-wide. There are Local Nature Reserves and a Community Woodland on the site.	These functions have been reviewed and the proposed scales of importance should be retained. However, the presence of football pitches on the site would give the additional function of Sport & Formal Recreation on a district scale.
050/S18	Function(s): Habitats and Species: City-wide.	This function has been reviewed and the proposed scale of importance should be retained.

051/S12, S18 & S26	Function(s): Habitats and Species: City-wide, Visual Amenity: City-wide, Separation/Buffer: City-wide.	We would welcome the upgrade of the site's functions for visual amenity and separation/buffer from city-wide to regional importance as this site represents an important edge between the city and wider countryside beyond overlooking the Tamar AONB. The location of a medieval manor and church on site S26 needs to be confirmed and an
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		<p>additional historical/cultural function of a city or regional-wide scale added to the Schedule subject to verification by PPC conservation officer.</p> <p>The remaining functions have been reviewed and the proposed scales of importance should be retained.</p>
052/S26 & N065	<p>Function(s): Habitats and Species: International, Visual Amenity: National, Separation/Buffer: Regional.</p> <p>The site is designated as an SPA, SAC and SSSI. It is bounded by the Tamar Valley AONB.</p>	<p>We would recommend that the site's functions for visual amenity and separation/buffer are altered from national to regional importance to remain consistent with functions applicable to 051.</p> <p>The presence of archaeological remains needs to be confirmed and site function added to the schedule if appropriate (see 051).</p> <p>The remaining functions have been reviewed and the proposed scales of importance should be retained.</p>

053/N001	<p>Function(s): Habitats and Species: International, Visual Amenity: Regional, Separation/Buffer: Regional.</p> <p>The site is designated as an SPA, SAC and SSSI</p>	<p>These functions have been reviewed and the proposed scales of importance should be retained. An additional function for Access Links (city-wide) should be considered given the presence of a major RoW leading onto the edge of the site.</p>
055/N016	<p>Function(s): Historical/Cultural: Regional.</p> <p>The site is designated as a Loc.A&HS</p>	<p>These functions have been reviewed and the proposed scales of importance should be retained given its local</p>

		designation and proximity to Agaton Fort, a SAM.
056/S25	Function(s): Habitats and Species: City-wide. The site is defined as Community Woodland.	This function has been reviewed and the proposed scale of importance should be retained. We accept the downgrading of the functions of the site for Visual Amenity and Separation/Buffer from City- to District-wide scale.
059/S24	Function(s): Habitats and Species: City-wide. The site is defined as Community Woodland.	This function has been reviewed and the proposed scale of importance should be retained. We question the downgrading of the site's functions for Visual Amenity and Separation/buffer from City- to District-wide scale based on its location alongside, and high visibility from, the A38 corridor.

060/S19	Function(s): Sport and Formal Recreation: District-wide, Historical/Cultural: National. The site is the location of a SAM, Nat.A&HS and Loc.A&HS.	The Sport and Formal Recreation function has been reviewed and the proposed scale of importance should be retained. The National Historical/Cultural function needs to be verified with PCC's conservation officer as not reference was made to the scale of importance of this site from previous discussions/surveys.
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061/N065	Function(s): Habitats and Species: International. The site is designated as an SPA, SAC and SSSI	This function has been reviewed and the proposed scale of importance should be retained.
062/S13	Function(s): Visual Amenity: Regional, Separation/Buffer: Regional.	These functions have been reviewed and the proposed scales of importance should be retained.
063/S14	Function(s): Visual Amenity: National, Separation/Buffer: Regional. The site is within the Tamar Valley AONB.	These functions have been reviewed and the proposed scales of importance should be retained
064/F3	Function(s): Habitats and Species: City-wide. Parts of the site is a Community Woodland and part is a SLINC.	This function has been reviewed and the proposed scale of importance should be retained. We accept the downgrading of the functions of the site for Visual Amenity and Separation/Buffer from City to District level.

066/S9, S10, S11 & S12	Function(s): Habitats and Species: City-wide, Visual Amenity: City-wide, Separation/Buffer: City-wide. Parts of the site are designated as a SLINC and Local Nature Reserve. The site abuts a SSSI and cSAC.	These functions have been reviewed and the proposed scales of importance should be retained.
067/S3	Function(s): Habitats and Species: City-wide.	This function has been reviewed and the proposed scale of importance should be retained.

069/N069	Function(s): Historical/Cultural: City-wide. The site is designated as a Loc.A&HS. There are Grade II listed buildings adjacent to the site.	This function has been reviewed and the proposed scale of importance should be retained.
070/S6	Function(s): Visual Amenity: Regional, Separation/Buffer: Regional, Access Corridors: City-wide. Part of the site is Community Woodland.	These functions have been reviewed and the proposed scales of importance should be retained.
071/S7	Function(s): Habitats and Species: City-wide, Visual Amenity: City-wide, Separation/Buffer: Regional.	These functions have been reviewed and the proposed scales of importance should be retained.
073/S4	Function(s): Habitats and Species: City-wide.	These functions have been reviewed and the proposed scales of importance should be retained.
074/S2	Function(s): Habitats and Species: City-wide, Visual Amenity: City-wide, Separation/Buffer: City-wide, Access Corridors: City-wide	These functions have been reviewed and the proposed scales of importance should be retained.

079/S18	Function(s): Habitats and Species: City-wide, Visual Amenity: City-wide, Separation/Buffer: City-wide, Historical/Cultural: Regional. The site is designated as a Loc.A&HS.	These functions have been reviewed and the proposed scales of importance should be retained. The exact location of the Loc.A&HS needs to be determined to justify its scale of importance.
083/S8 & N075	Function(s): Habitats and Species: City-wide, Historical/Cultural: National. The site is the location of a SAM, and is designated as a Nat.A&HS.	These functions have been reviewed and the proposed scales of importance should be retained.

094/T16	Function(s): Habitats and Species: City-wide, Visual Amenity: City-wide, Separation/Buffer: City-wide	These functions have been reviewed and the proposed scales of importance should be retained.
095/N123	Function(s): Visual Amenity: City-wide.	This function has been reviewed and the proposed scale of importance should be retained.
096/N124	Function(s): Visual Amenity: City-wide.	This function has been reviewed and the proposed scale of importance should be retained.'
097/T16	Function(s): Informal Recreation: Regional, Habitats and Species: Regional, Visual Amenity: Regional, Separation/Buffer: Regional, Access Corridors: Regional, Historical/Cultural: City-wide. The site is designated as an Area of Great Landscape Value (AGLV). It is also important for industrial archaeology.	These functions have been reviewed and the proposed scales of importance should be retained.
098/N082	Function(s): Sport and Formal Recreation: City-wide, Access Corridors: City-wide.	These functions have been reviewed and the proposed scales of importance should be retained.

101/C12 & N050	Function(s): Habitats and Species: City-wide, Visual Amenity: City-wide.	These functions have been reviewed and the proposed scales of importance should be retained.
106/N126	Function(s): Sport and Formal Recreation: City-wide.	This function has been reviewed and the proposed scale of importance should be retained.
107/not surveyed by LUC	Function(s): Habitats and Species: National There is a SSSI designation on the site.	This function has been reviewed on the basis of its SSSI designation and the proposed scale of importance

		should be retained.
108/C9, C10, C11, C18 & N128	Function(s): Habitats and Species: City-wide, Access Corridors: City-wide, Historical/Cultural: National. A SAM lies adjacent to the site. There is a Local Nature Reserve at Bircham Valley.	These functions have been reviewed and the proposed scales of importance should be retained.
110/C14, T16 & N096	Function(s): Informal Recreation: City-wide, Habitats and Species: City-wide, Visual Amenity: City-wide, Separation/Buffer: City-wide, Historical/Cultural: City-wide. Part of the site is a SLINC, part is an AGLV.	These functions have been reviewed and the proposed scales of importance should be retained.
111/T13	Function(s): Visual Amenity: City-wide, Separation/Buffer: Regional, Historical/Cultural: Regional, Countryside/Food Growing: City-wide. There is an LHP&G at Boringdon (adjacent to the site to the north).	These functions have been reviewed and the proposed scales of importance should be retained.
120/C16	Function(s): Habitats and Species: City-wide. Part of the site is defined as a SLINC.	This function has been reviewed and the proposed scale of importance should be retained.

121/N091	Function(s): Sport and Formal Recreation: City-wide.	This function has been reviewed and the proposed scale of importance should be retained.
129/F1	Function(s): Sport and Formal Recreation: City-wide, Habitats and Species: City-wide. Part of the site is defined as a SLINC.	These functions have been reviewed and the proposed scales of importance should be retained. We welcome the upgrading of the Habitats and Species function from neighbourhood to city level, based on the high nature conservation value of the site's

		woodlands and wetlands.
130/N098	Function(s): Sport and Formal Recreation: City-wide, Habitats and Species: City-wide.	These functions have been reviewed and the proposed scales of importance should be retained.
139/not surveyed by LUC	Function(s): Habitats and Species: National. The site has a SSSI designation.	This function has been reviewed on the basis of its SSSI designation and the proposed scale of importance should be retained.
141/N010	Function(s): Sport and Formal Recreation: City-wide.	This function has been reviewed and the proposed scale of importance should be retained.
142/E9,E10 and N102	Function(s): Historical/Cultural: Regional. Part of the site (Mutley Park) is defined as a Local Historic Park and Garden (LHP&G).	This function has been reviewed and the proposed scale of importance should be retained.
144/E12	Function(s): Habitats and Species: City-wide, Visual Amenity: City-wide. The site is designated a SLINC.	These functions have been reviewed and the proposed scales of importance should be retained.

145/E11	Function(s): Informal Recreation: Regional, Sport and Formal Recreation: Regional, Visual Amenity: City-wide, Separation/Buffer: City-wide, Access Corridors: City-wide, Historical/Cultural: Regional. The site is a Local Historic Park and Garden (Central Park)	These functions have been reviewed and the proposed scales of importance should be retained. We welcome the additional Historical/Cultural function, based on its designation as a LHP&G. (information not provided to LUC at time of survey)
146/R3	Function(s): Historical/Cultural: National. The site is a Local Historic Park and	This function has been reviewed and the proposed scale of importance should be

	Garden (Freedom Fields).	retained.
150/C3	Function(s): Habitats and Species: City-wide, Historical/Cultural: City-wide. The site is defined as a SLINC. There is also a Loc.A&HS designation for the site.	The Habitats and Species function has been reviewed and the proposed scale of importance should be retained. The presence of a Loc.A&HS on or adjacent to the site needs to be confirmed in order to review the Historical/Cultural function. LUC was unaware of this site function at the time of the site survey.
154/NI30	Function(s): Historical/Cultural: City-wide. There is also a Loc.A&HS designation for the site.	This function has been reviewed and the proposed scale of importance should be retained.
155/C7	Function(s): Habitats and Species: City-wide, Visual Amenity: City-wide, Access Corridors: City-wide, Historical/Cultural: City-wide. There is a Loc.A&HS at Austin Fort (adjacent and overlooking the site). The site is designated a Local Nature Reserve	This function has been reviewed and the proposed scale of importance should be retained.

156/C8	Function(s): Habitats and Species: National, Visual Amenity: City-wide, Access Corridors: City-wide, Countryside/Food Growing: City-wide. The site is a Local Nature Reserve.	These functions have been reviewed and the proposed scales of importance should be retained.
157/C19	Function(s): Visual Amenity: City-wide.	This function has been reviewed and the proposed scale of importance should be retained.
161/NI49	Function(s): Habitats and Species: City-	This function has been reviewed and the proposed

	wide.	scale of importance should be retained.
166/E4	Function(s): Habitats and Species: National, Visual Amenity: City, Separation/Buffer: City, Historical/Cultural: National. Nat.A&HS at Efford Fort and Emplacement.	These functions have been reviewed and the proposed scales of importance should be retained. We agree with the upgrade of the Historical/Cultural function from district to national level, reflecting the Fort's designation.
167/E7,E8	Function(s): Habitats and Species: City-wide. The site is defined as a SLINC.	This function has been reviewed and the proposed scale of importance should be retained. We would, however, like to see the site's functions for Visual Amenity and Separation/Buffer upgrading from district to city level. This is based on its location alongside the A38 corridor and its high visibility.

177/E1 & NI35	Function(s): Habitats and Species: City-level. Parts of the site defined as a SLINC.	This function has been reviewed and the proposed scale of importance should be retained. We agree with the function being upgraded from district to city level based on the high conservation value of its woodland belts.
185/NI51	Function(s): Historical/Cultural: National. Nat.A&HS at Efford Emplacement.	This function has been reviewed and the proposed scale of importance should be retained. We would propose that the site's function for

		Habitats/Species should be upgraded from neighbourhood to district level, based on the presence of woodland of high nature conservation value however this needs to be verified with PCC ecologists.
191/P29 & R15	Function(s): Informal Recreation: Regional, Sport and Formal Recreation: Regional, Habitats and Species: Regional, Visual Amenity: City, Separation/Buffer: City, Access Corridors: Regional.	These functions have been reviewed and the proposed scales of importance should be retained.
192/P29 & R15	Function(s): Informal Recreation: Regional, Habitats and Species: City, Visual Amenity: City, Separation/Buffer: City, Access Corridors: Regional, Historical/Cultural: National. The site is a Registered Historic Park & Garden (RHP&G)	These functions have been reviewed and the proposed scales of importance should be retained.
193/P29	Function(s): Informal Recreation: Regional, Visual Amenity: City-wide, Separation/Buffer: City-wide, Historical/Cultural: National, Countryside/Food Growing: National. The site is a RHP&G.	These functions have been reviewed and the proposed scales of importance should be retained.

194/B11	Function(s): Informal Recreation: City-wide, Habitats and Species: National, Visual Amenity: City-wide, Access corridors: City-wide, Historical/Cultural: Regional. The site is a Loc.A&HS, SLINC, and part of a SSSI.	These functions have been reviewed and the proposed scales of importance should be retained. We agree with the upgrading of the Historical/Cultural function from city to regional level, based on its designation as a Loc.A&HS.
195/P29	Function(s): Informal Recreation: Regional, Habitats and Species: City-wide, Visual Amenity: City-wide, Separation/Buffer:	These functions have been reviewed and the proposed scales of importance should be

	<p>City-wide, Historical/Cultural: Regional.</p> <p>The site is a Registered Historic Park & Garden.</p>	retained.
196/P29, T3 & T22	<p>Function(s): Habitats and Species: City-wide, Visual Amenity: City-wide, Separation/Buffer: City-wide, Countryside/Food Growing: City-wide.</p>	<p>These functions have been reviewed and the proposed scales of importance should be retained. We would like to see the addition of the Access Corridors function, based on the promoted links from the site to the Plym Valley path and cycle route. This should be of a City-wide importance.</p>
197/T21	<p>Function(s): Sport and Formal Recreation: City-wide.</p>	<p>This function has been reviewed and the proposed scales of importance should be retained.</p>
213/N037	<p>Function(s): Historical/Cultural: National.</p> <p>Designations: SAM, Nat.A&HS.</p>	<p>This function has been reviewed and the proposed scale of importance should be retained.</p>
218/T19	<p>Function(s): Historical/Cultural: Regional.</p> <p>The remains of Plympton Castle, designated a Loc.A&HS, are located just to the south of the site.</p>	<p>This function needs to be confirmed. The historical feature is not on the site itself, although any potential development would impact on its setting.</p>

219/N153	<p>Function(s): Historical/Cultural: National.</p> <p>The site contains a SAM (Plympton Castle)</p>	<p>This function has been reviewed and the proposed scale of importance should be retained. In addition there should be city-wide scales of importance for Informal Recreation and Visual Amenity. The site is a popular tourist attraction with long views across the city.</p>
220/T1	<p>Function(s): Visual Amenity: City-wide, Separation/Buffer: City-wide.</p>	<p>These functions have been reviewed and the proposed scales of importance should be</p>

	The site is defined as a SLINC.	retained. The presence of ancient woodland on the site should merit at least city-wide value for its Habitats and Species.
221/T1	Function(s): Habitats and Species: City-wide, Visual Amenity: City-wide, Separation/Buffer: City-wide.	These functions have been reviewed and the proposed scales of importance should be retained.
222/T4	Function(s): Visual Amenity: City-wide, Separation/Buffer: City-wide, Countryside/Food Growing: City-wide.	These functions have been reviewed and the proposed scale of importance should be retained. We agree with the upgrading of the site's Habitats and Species function from district to city level based on the presence of woodlands and hedgerows of high nature conservation value..
223/T2	Function(s): Habitats and Species: City-wide. The site is defined as a SLINC.	This function has been reviewed and the proposed scale of importance should be retained.

226/T15	Function(s): Habitats and Species: City-wide. The site is defined as a SLINC.	This function has been reviewed and the proposed scale of importance should be retained. We welcome its upgrade from district to city-wide value.
227/T12	Function(s): Habitats and Species: City-wide, Visual Amenity: City-wide, Separation/Buffer: City-wide.	These functions have been reviewed and the proposed scales of importance should be retained.
228/T11 &	Function(s): Habitats and Species: City-	The Habitats and Species function has been reviewed

N015	wide, Historical/Cultural: City-wide. Part of the site is a SLINC. There is a Loc.A&HS designation for the site.	and the proposed scale of importance should be retained.
229/T17	Function(s): Countryside/Food Growing: City-wide.	This function has been reviewed and the proposed scale of importance should be retained.
236/T6 & N155	Function(s): Habitats and Species: City-wide. Part of the site is defined as a SLINC.	This function has been reviewed and the proposed scale of importance should be retained.
238/T7	Function(s): Historical/Cultural: Regional The site is a Registered Historic Park and Garden (RHP&G).	At the time of site surveys we were not informed of this site's designation.
242/T20	Function(s): Historical/Cultural: National The site is a RHP&G.	This function has been reviewed and the proposed scale of importance should be retained.

248/T4	Function(s): Habitats and Species: City-wide, Visual Amenity: City-wide, Separation/Buffer: City-wide.	These functions have been reviewed and the proposed scales of importance should be retained. We agree with the upgrading of the site's Habitats and Species function from district to city level based on the presence of woodlands and hedgerows of high nature conservation value.
249/T4	Function(s): Habitats and Species: City-wide, Visual Amenity: City-wide,	These functions have been reviewed and the proposed scale of importance should be

	Separation/Buffer: City-wide.	retained. We agree with the upgrading of the site's Habitats and Species function from district to city level based on the presence of woodlands and hedgerows of high nature conservation value..
250/B10	Function(s): Historical/Cultural: City-wide. There is a Loc.A&HS designation for the site.	This function has been reviewed and the proposed scale of importance should be retained.
251/B10	Function(s): Sport and Formal Recreation: City-wide, Historical/Cultural: City-wide. There is a Loc.A&HS designation for the site.	These functions have been reviewed and the proposed scales of importance should be retained. We agree with the upgrading of the Sport and Formal Recreation function from district to city level.
255/N048	Function(s): Historical/Cultural: City-wide. There is a Loc.A&HS designation for the site.	The exact importance of the site for this function needs clarifying. The Sites and Monument record indicates that the function is based on the site's location close to buildings of historical interest, rather than the importance of the site itself.

256/N052	Function(s): Historical/Cultural: City-wide. There is a Loc.A&HS designation for the site.	This function has been reviewed and the proposed scale of importance should be retained.
258/B9	Function(s): Sport and Formal Recreation: City-wide, Historical/Cultural: Regional. There is a Loc.A&HS designation for the site.	These functions have been reviewed and the proposed scales of importance should be retained. We accept the downgrading of the Historical/Cultural function from National to Regional level, which reflects its

		designation.
259/B10	Function(s): Historical/Cultural: National There is a SAM designation for the site.	We were unaware of the presence of a SAM on the site. If the SAM designation is confirmed, we accept the upgrading of the Historical/Cultural function from City to National level.
260/N049	Function(s): Sport and Formal Recreation: City-wide.	This function has been reviewed and the proposed scale of importance should be retained.
261/N059	Function(s): Historical/Cultural: City-wide. There is a Loc.A&HS designation for the site.	This function has been reviewed and the proposed scale of importance should be retained.
262/N060	Function(s): Historical/Cultural: National The site forms the grounds of the Grade II* Listed Buildings next to the site, and it is within a Conservation Area.	This function has been reviewed and the proposed scale of importance should be retained.
263/N061	Function(s): Historical/Cultural: National The site forms the grounds of the Grade II* Listed Buildings next to the site, and it is within a Conservation Area.	This function has been reviewed and the proposed scale of importance should be retained.

264/N044	Function(s): Visual Amenity: City-wide, Historical/Cultural: City-wide. There is a Loc.A&HS designation for the site.	This function has been reviewed and the proposed scale of importance should be retained.
265/N045	Function(s): Informal Recreation: City-wide, Visual Amenity: City-wide, Access Corridors: City-wide, Historical/Cultural: Regional. There is a Loc.A&HS designation for the site.	These functions have been reviewed and the proposed scales of importance should be retained.

267/P9	Function(s): Separation/Buffer: City-wide. Part of the site is defined as a SLINC.	This function has been reviewed and the proposed scale of importance should be retained.
268/P9	Function(s): Habitats and Species: City-wide. Part of the site is defined as a SLINC.	We accept that this function has been upgraded from District to Citywide, reflecting the high nature conservation value of the site's woodland belt.
269/R13	Function(s): Informal Recreation: City-wide, Habitats and Species: City-wide, Visual Amenity: National, Separation/Buffer: City-wide, Access Corridors: City-wide, Historical/Cultural: National. There is a SAM designation for the site. The site is a SLINC, and part is SSSI.	The Habitats and Species function should be upgraded to at least regional level, if not national importance as part of the sites is a SSSI. The other site functions have been reviewed and the proposed scales of importance should be retained.
270/P12	Function(s): Visual Amenity: City-wide, Separation/Buffer: City-wide, Countryside/Food Growing: City-wide.	These functions have been reviewed and the proposed scales of importance should be retained.

271/N063	Function(s): Access Corridors: National, Historical/Cultural: City-wide. There is a Loc.A&HS designation for the site.	These functions have been reviewed and the proposed scales of importance should be retained.
272/N064	Function(s): Historical/Cultural: City-wide. There is a Loc.A&HS designation for the site.	This function has been reviewed and the proposed scale of importance should be retained.
274/N066	Function(s): Visual Amenity: City-wide, Historical/Cultural: National.	These functions have been reviewed and the proposed scales of importance should be

	This site has a SAM designation.	retained.
278/N080	Function(s): Habitats and Species: City-wide.	This function has been reviewed and the proposed scale of importance should be retained.
279/N087	Function(s): Habitats and Species: City-wide.	This function has been reviewed and the proposed scale of importance should be retained.
283/N031	Function(s): Sport and Formal Recreation: City-wide.	This function has been reviewed and the proposed scale of importance should be retained.
287/N051	Function(s): Historical/Cultural: City-wide. The site has a Loc.A&HS designation.	This function has been reviewed and the proposed scale of importance should be retained.
291/N107	Function(s): Sport and Formal Recreation: City-wide.	This function has been reviewed and the proposed scale of importance should be retained.

293/R12	Function(s): Informal Recreation: City-wide, Separation/Buffer: City-wide, Access Corridors: National, Historical/Cultural: City-wide. The site is SLINC and abuts a cSAC	These functions have been reviewed and the proposed scales of importance should be retained. We strongly suggest adding the Habitats/Species function to the Schedule on a city wide scale. The site is a SLINC, abuts a cSAC and contains a number of rare species.
294/N112	Function(s): Informal Recreation: City-wide, Habitats and Species: City-wide,	These functions have been reviewed and the proposed scales of importance should be

	Historical/Cultural: City-wide.	retained. We recommend that the site's function as a Separation/Buffer be upgraded from neighbourhood to district level based on its waterfront location and its function in separating the city's historic core from the urban centre.
295/R11	Function(s): Informal Recreation: National, Habitats and Species: City-wide, Access Corridors: City-wide, Historical/Cultural: National. The site is a LHP&G and contains a SAM.	These functions have been reviewed and the proposed scales of importance should be retained.
296/R12	Function(s): Informal Recreation: City-wide, Habitats and Species: City-wide, Visual Amenity: Regional, Historical/Cultural: National. The site is designated as a Nat.A&HS	These functions have been reviewed and the proposed scales of importance should be retained.
299/N148	Function(s): Habitats and Species: City-wide.	This function has been reviewed and the proposed scale of importance should be retained.

303/P12	Function(s): Habitats and Species: City-wide, Visual Amenity: City-wide, Separation/Buffer: City-wide. Part of the site is defined as a SLINC.	These functions have been reviewed and the proposed scales of importance should be retained. We accept the upgrading of the Habitats and Species function from district to city-wide level based on the presence of woodland belts, hedgerows and grassland of nature conservation interest.
306/N057	Function(s): Historical/Cultural: City-wide.	This function has been reviewed and the proposed scale of importance should be

		retained.
314/R10	Function(s): Historical/Cultural: City-wide.	This function has been reviewed and the proposed scale of importance should be retained.
316/R5	Function(s): Historical/Cultural: Regional. The site is a LHP&G	This function has been reviewed and the proposed scale of importance should be retained.
318/R14	Function(s): Visual Amenity: City-wide.	This function has been reviewed and the proposed scale of importance should be retained.
319/N137	Function(s): Visual Amenity: City-wide, Separation Buffer: City-wide.	These functions have been reviewed and the proposed scales of importance should be retained.

320/R9	Function(s): Habitats and Species: National, Historical/Cultural: National. The site is designated a SSSI and Nat.A&HS.	We accept the upgrading of the Habitats and Species function to a national level, based on the site's SSSI designation. We are unaware of the national designation for the site's Historical/Cultural function and would seek confirmation from PCC conservation officer of the scale of importance.
327/R8	Function(s): Habitats and Species: City-	This function has been reviewed and the proposed

	<p>wide.</p> <p>The site is defined as a SLINC</p>	<p>scale of importance should be retained.</p>
330/R15	<p>Function(s): Informal Recreation: Regional, Habitats and Species: City-wide.</p> <p>The site is defined as a SLINC.</p>	<p>These functions have been reviewed and the proposed scales of importance should be retained. We welcome the upgrading of the site's Informal Recreation function from neighbourhood to regional level, based on the major cycleway and footpath that runs along the site edges. We also accept the downgrading of the Habitats and Species function from regional to city level.</p>
332/P30	<p>Function(s): Habitats and Species: City-wide.</p> <p>The site is defined as a SLINC.</p>	<p>This function has been reviewed and the proposed scale of importance should be retained.</p>
333/P23	<p>Function(s): Habitats and Species: Regional, Separation Buffer: City-wide.</p>	<p>These functions have been reviewed and the proposed scales of importance should be retained.</p>

334/P23	<p>Function(s): Habitats and Species: National, Separation/Buffer: City-wide.</p> <p>The site is designated a SSSI.</p>	<p>These functions have been reviewed and the proposed scales of importance should be retained.</p>
335/P35	<p>Function(s): Visual Amenity: City-wide, Separation/Buffer: City-wide.</p>	<p>These functions have been reviewed and the proposed scales of importance should be retained. We accept the addition of the Visual Amenity and Separation/Buffer functions to the Schedule.</p>

336/N113	Function(s): Visual Amenity: National, Separation/Buffer: Regional. The site is within the South Devon AONB	These functions have been reviewed and the proposed scales of importance should be retained.
337/P28	Function(s): Habitats and Species: City-wide, Separation/Buffer: City-wide. The site is defined as a SLINC	These functions have been reviewed and the proposed scales of importance should be retained.
338/P13, P27, P29, P33, P34	Function(s): Visual Amenity: Regional, Separation/Buffer: Regional, Countryside/Food Growing: City-wide.	These functions have been reviewed and the proposed scales of importance should be retained. We recommend that the Habitats/Species function be upgraded from district to city wide level as the site contains many habitats/species of high nature conservation interest.
339/P11	Function(s): Informal Recreation: City-wide, Sport and Formal Recreation: City-wide, Separation/Buffer: City-wide.	These functions have been reviewed and the proposed scales of importance should be retained.
340/P24 & N109	Function(s): Sport and Formal Recreation: City-wide, Habitats and Species: City-wide. The site is defined as a SLINC	These functions have been reviewed and the proposed scales of importance should be retained.

341/P25 & P32	Function(s): Habitats and Species: City-wide. The site is defined as a SLINC.	This function has been reviewed and the proposed scale of importance should be retained. We welcome the function being upgraded to a city-wide scale of importance based on its important habitats and rare species for nature conservation interest.
343/P1 & P2	Function(s): Informal Recreation: Regional, Visual Amenity: Regional, Separation/Buffer: Regional, Access Corridors: National, Historical/Cultural:	These functions have been reviewed and the proposed scales of importance should be

	National. There is a SAM designation for this site.	retained.
344/P1	Function(s): Sport and Formal Recreation: City-wide, Habitats and Species: City-wide, Visual Amenity: Regional, Separation/Buffer: City-wide, Historical/Cultural: National. There is a SAM designation for this site.	These functions have been reviewed and the proposed scales of importance should be retained.
345/P2	Function(s): Informal Recreation: Regional, Habitats and Species: International, Visual Amenity: Regional, Separation/Buffer: City-wide, Historical/Cultural: National. There are SSSI and SAC designations for this site.	These functions have been reviewed and the proposed scales of importance should be retained. We welcome the upgrading of the Habitats and Species function from regional to international scale based on the SAC designation.
346/P3, P6 & P36	Function(s): Sport and Formal Recreation: City-wide, Visual Amenity: Regional, Separation/Buffer: Regional, Access Corridors: Regional, Historical/Cultural: National. There is a Nat.A&HS designation for this site.	These functions have been reviewed and the proposed scales of importance should be retained.

347/P3 & N093	Function(s): Informal Recreation: Regional, Habitats and Species: City-wide, Visual Amenity: National, Separation/Buffer: City-wide, Access Corridors: National, Historical/Cultural: National. The site has the following designations: CPA, AONB and Nat.A&HS.	These functions have been reviewed and the proposed scales of importance should be retained. There should be an additional site function for Sport and Formal Recreation on a city-wide scale as the site contains a golf course.
348/P2, P3	Function(s): Informal Recreation: City-wide, Habitats and Species: International, Visual Amenity: National, Separation/Buffer: City-wide,	These functions have been reviewed and the proposed scales of importance should be retained. There should be an additional site function for

	<p>Historical/Cultural: National.</p> <p>The site has the following designations: SSSI, SAC, CPA, AONB and Nat.A&HS.</p>	<p>Sports and Formal Recreation on a city-wide scale as the site contains a golf course.</p>
349/P2	<p>Function(s): Informal Recreation: City-wide, Habitats and Species: International, Visual Amenity: Regional, Separation/Buffer: City-wide.</p> <p>The site has the following designations: SAC, CPA and Nat.A&HS.</p>	<p>These functions have been reviewed and the proposed scales of importance should be retained.</p>
350/P3, P6	<p>Function(s): Habitats and Species: City-wide, Visual Amenity: Regional, Separation/Buffer: City.</p> <p>The site is designated a Nat.A&HS.</p>	<p>These functions have been reviewed and the proposed scales of importance should be retained.</p>
351/N086	<p>Function(s): Habitats and Species: City-wide.</p>	<p>This function has been reviewed and the proposed scale of importance should be retained. An additional function for Access Corridors on a regional scale should be added as the South West Coast Path (National trail) crosses the site. A function for informal recreation should also be added to the Schedule, on a neighbourhood scale.</p>

352/R13	<p>Function(s): Informal Recreation: City-wide, Habitats and Species: National, Visual Amenity: National, Separation/Buffer: City-wide, Access Corridors: City-wide, Historical/Cultural: Regional.</p> <p>The site is designated a SSSI and a Loc.A&HS..</p>	<p>These functions have been reviewed and the proposed scales of importance should be retained.</p>
354/not surveyed by LUC	<p>Function(s): Historical/Cultural: National.</p> <p>The site is designated a Nat.A&HS.</p>	<p>This function has been reviewed and the proposed scale of importance should be</p>

		retained.
356/P17	Function(s): Habitats and Species: City-wide, Separation/Buffer: City-wide.	These functions have been reviewed and the proposed scales of importance should be retained.
357/N160	Function(s): Separation/Buffer: City-wide.	These functions have been reviewed and the proposed scales of importance should be retained.
359/N090	Function(s): Access Corridors: Regional.	This function has been reviewed and the proposed scale of importance should be retained.
360/P18, P19	Function(s): Informal Recreation: City-wide, Habitats and Species: City-wide, Visual Amenity: City-wide, Access Corridors: Regional, Historical/Cultural: City-wide.	These functions have been reviewed and the proposed scales of importance should be retained.
361/P18	Function(s): Informal Recreation: City-wide, Habitats and Species: City-wide, Visual Amenity: City-wide, Access Corridors: Regional, Historical/Cultural: City-wide.	These functions have been reviewed and the proposed scales of importance should be retained. We accept the upgrading of the Access Corridors function from district to regional level, based on the presence of the Erme-Plym trail.

362/P19	Function(s): Informal Recreation: City-wide, Visual Amenity: City-wide, Access Corridors: Regional, Historical/Cultural: City-wide.	These functions have been reviewed and the proposed scales of importance should be retained. We accept the upgrading of the Access Corridors function from district to regional level, based on the presence of the Erme-Plym trail.
363/P19	Function(s): Habitats and Species: City-wide	This function has been reviewed and the proposed scale of importance should be

	The site is defined as a SLINC	retained.
365/N036	Function(s): Habitats and Species: City-wide	This function has been reviewed and the proposed scale of importance should be retained.
368/P5	Function(s): Habitats and Species: City-wide, Visual Amenity: City-wide, Separation/Buffer: City-wide. The site is designated a SLINC.	These functions have been reviewed and the proposed scales of importance should be retained. We welcome the Habitats and Species function and the Visual Amenity function being upgraded to city level.
369/P4	Function(s): Habitats & Species: City-wide, Visual Amenity: Regional, Separation/Buffer: Regional. The site is defined as a SLINC.	These functions have been reviewed and the proposed scales of importance should be retained.
370/P4	Function(s): Habitats and Species: Regional, Visual Amenity: Regional, Separation/Buffer: Regional, Access Corridors: Regional.	These functions have been reviewed and the proposed scales of importance should be retained. We welcome the Habitats/Species function being upgraded from city to regional level to reflect the importance of its natural habitats and rare species.

372/N118	Function(s): Sport & Formal Recreation: City-wide, Separation/Buffer: Regional.	These functions have been reviewed and the proposed scales of importance should be retained.
375/P14	Function(s): Habitats and Species: City-wide, Visual Amenity: City-wide.	These functions have been reviewed and the proposed scales of importance should be retained. We agree with the upgrading of the Habitats and Species function from district to city level.

377/P15	Function(s): Visual Amenity: City-wide, Historical/Cultural: National. The site has the following designations: SAM and Nat.A&HS.	These functions have been reviewed and the proposed scales of importance should be retained.
378/N105	Function(s): Historical/Cultural: National. The site has a Nat.A&HS designation.	This function has been reviewed and the proposed scale of importance should be retained.
383/P19 & N035	Function(s): Access Corridors: Regional	This function has been reviewed and the proposed scale of importance should be retained.
385/N099	Function(s): Access Corridors: Regional.	These functions have been reviewed and the proposed scales of importance should be retained.
386/P22	Function(s): Habitats and Species: City-wide.	This function has been reviewed and the proposed scale of importance should be retained.
387/P31	Function(s): Habitats and Species: City-wide.	This function has been reviewed and the proposed scale of importance should be retained.

389/P8	Function(s): Habitats and Species: City-wide.	This function has been reviewed and the proposed scale of importance should be retained.
391/R15	Function(s): Habitats and Species: Regional, Visual Amenity: City, Separation/Buffer: City.	This function has been reviewed and the proposed scale of importance should be retained.