



# CONSULTATION RESPONSE REPORT

OCTOBER 2020



# **LOCAL GREEN SPACE DEVELOPMENT PLAN DOCUMENT (LGS DPD)**

## **Consultation Response Report**

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## **INTRODUCTION**

This document reports on all of the representations received during the first Regulation 18 Consultation for the Local Green Space Development Plan Document (LGS DPD). The consultation focused on the criteria for allocation and green space assessment methodology and ran from 7th February – 23rd March 2020.

In total, **164** comments were made by **33** contributing consultees in response to the Local Green Space consultation document.

Representations were received from residents, statutory consultees, developers, landowners and community groups.

The Sustainability Appraisal/Strategic Environmental Assessment was also published as a supporting document during the first Regulation 18 Consultation for the LGS DPD. No comments were received in response to the Sustainability Appraisal/Strategic Environmental Assessment.

## **RESPONSES TO CONSULTATION**

A summary of the key issues raised by representations is set out in **APPENDIX I**.

A list of departments, organisations, companies and local community groups that submitted comments is included within **APPENDIX II**.

A Response Report for all the comments received is included in **APPENDIX III**.

Proposed changes to the Local Green Space Methodology and Designation Criteria is included in **APPENDIX IV**.

## APPENDIX I

Key issues raised by representations.

This summary is not exhaustive, but provides an insight in to some of the matters that emerged during the consultation.

- Significant support shown to protect Local Green Spaces within the Plymouth Policy Area through the preparation of a Development Plan Document.
- Recognition of the importance of green spaces, in particular, benefits associated with mental health and wellbeing.
- Recognition that green spaces have a role to play in helping to address climate change challenges.
- Some disagreement about what should and should not be scoped out of assessments when nominations are being considered.
- Uncertainty over the legislation that informs how we need to prepare the Local Green Space Development Plan Document and frustrations regarding the time it takes to produce.
- Importance of community engagement recognised and value of local knowledge was communicated.
- Awareness raised about Mineral Safeguarding Areas and Mineral Consultation Zones.
- Suggestions regarding additional secondary information sources.
- Site specific Local Green Space nominations were made.

## APPENDIX II

A list of departments, organisations, companies and local community groups that submitted comments during the consultation; ordered alphabetically.

1. Aggregate Industries Limited
2. Central Park Allotments Association
3. Collings Park Trust
4. Devon County Council
5. Devon Garden Trust
6. Highways England
7. Historic England
8. Hoe Conservation Area Residents Association
9. Marine Management Organisation
10. Ministry of Defence
11. Natural England
12. Plymouth Civic Society
13. Plymouth Open Space Network
14. Plympton St Mary Neighbourhood Forum
15. Plympton St Maurice Civic Association
16. Rockspring Barwood Plymouth Ltd
17. South West Water
18. St Levan Park NHW
19. Tamerton Foliot Village Conservation Society

## APPENDIX III

A Response Report for all the comments received in ascending order using the comment ID number generated by our online portal Objective.

Comment ID	Company / Organisation (Consultee)	Consultation point	Comment summary	Summary Statement	Detailed responses
1		Do you think it is a good idea to create a Local Green Space Development Plan Document for the Plymouth Policy Area?	Supportive of a Local Green Space Development Plan Document. Recognition of the important role of greenspaces. Considers much greenery has been removed in Plymouth over the years. Reference to Thorn Park and an area of trees nearby. Suggestion that a skate park within the city centre would be beneficial to the community.	No change	Through the preparation of the Local Green Space Development Plan Document, the local community will be given the opportunity to nominate green spaces that are important to them. It may be appropriate for you to nominate Thorn Park or nearby land that is of importance to you during the next stage of community engagement. Joint Local Plan Policy PLY15 specifically relates to the Civic Centre and Council House site where part 2 states that development should provide enhancement of the Civic Square, this could provide an opportunity to deliver new recreational facilities and would not necessarily preclude the delivery of a skate park. The Joint Local Plan also supports the delivery of a skate park at Sherford as part of policy PLY6. Also in 2018 the council opened its improved skate facilities in Central Park.

<b>Comment ID</b>	<b>Company / Organisation (Consultee)</b>	<b>Consultation point</b>	<b>Comment summary</b>	<b>Summary Statement</b>	<b>Detailed responses</b>
2	Central Park Allotments Association	Do you think it is a good idea to create a Local Green Space Development Plan Document for the Plymouth Policy Area?	Supportive of a Local Green Space Development Plan Document	No change	The Local Planning Authorities note your support for protecting green spaces and the production of the Local Green Space Development Plan Document.
3	Central Park Allotments Association	Consultation Question 4	Why are allotments not included in the document, is it because they are already protected?	No change	Allotments are protected by existing planning policy. Policy DEV5 in the Joint Local Plan states that 'Development on existing allotment and community food growing sites will only be permitted where there is an overriding sustainable development justification for the proposal, with re-provision of the lost facilities in a location appropriate to the demand.
4		Do you think it is a good idea to create a Local Green Space Development Plan Document for the Plymouth Policy Area?	Supportive of a Local Green Space Development Plan Document and recognition of the importance of green spaces on mental health and wellbeing.	No change	The Local Planning Authorities note your support for protecting green spaces and the production of the Local Green Space Development Plan Document. The Councils recognise local green spaces can provide health and wellbeing benefits and are currently working with other Local Authorities to consider how best to assess and capture this information.

<b>Comment ID</b>	<b>Company / Organisation (Consultee)</b>	<b>Consultation point</b>	<b>Comment summary</b>	<b>Summary Statement</b>	<b>Detailed responses</b>
5		Do you think it is a good idea to create a Local Green Space Development Plan Document for the Plymouth Policy Area?	Supportive of protecting greenspaces. Unclear about the need to use the Local Green Space Development Plan Document as a tool for protecting Local Green Spaces in the longer term. Frustration that housing development and poor infrastructure in the north of Plymouth has led to significant tree loss.	No change	The planning system in England determines how Local Planning Authorities must produce planning policy documents. In order to protect green spaces, the Local Planning Authorities must ensure they follow established protocols and procedures. Producing a new policy is an iterative process where ideas are gathered, shared and consulted on through engagement.
6		Do you think it is a good idea to create a Local Green Space Development Plan Document for the Plymouth Policy Area?	Supportive of protecting greenspaces as green areas are essential and the Local Planning Authorities need to protect what limited green areas we have left.	No change	The Local Planning Authorities note your support for protecting green spaces and the production of the Local Green Space Development Plan Document.
7		Consultation Question 2	Support for question 2.	No change	The Local Planning Authorities note your support for question 2 in the consultation document.
8		Consultation Question 3	Query regarding online consultation response form.	No change	In accordance with national planning requirements, the Local Planning Authorities must verify the author of all comments provided as part of this consultation to ensure comments are duly made.

Comment ID	Company / Organisation (Consultee)	Consultation point	Comment summary	Summary Statement	Detailed responses
9	Aggregate Industries UK Limited	Consultation Question 6	Supportive of Assessment 1 and 2. The criterion within Assessment 2 should be extended to include Mineral Safeguarding Areas to ensure wider policy compliance.	Change to be made	Policy PLY5 in the Joint Local Plan states the Plymouth Local Planning Authority will work together with adjoining Local Minerals Authorities to support and facilitate the sustainable use of mineral reserves of national and local importance. Part 2 of this policy states that Mineral Safeguarding Areas will be identified so that long term minerals are not needlessly sterilised. During the screening process, the Local Planning Authorities will ensure that sites within a designated Mineral Safeguarding Area are scoped out as they are not considered suitable for Local Green Space designation. Where sites are identified within Mineral Consultation Areas, we will consult with our adjoining Local Minerals Authorities as appropriate to ensure informed decisions about Local Green Space designations are made.
10		Consultation Question 6 (Criteria)	It is important to consider limitations picked up for a site through the Strategic Housing Land Availability Assessment, when considering Local Green Space proposals.	No change	All Local Green Space nominations will be reviewed using the Local Greenspace assessment criteria, which will inform whether a green space is suitable for designation.

Comment ID	Company / Organisation (Consultee)	Consultation point	Comment summary	Summary Statement	Detailed responses
11		Consultation Question 6 (Assessment 3)	The value of green space goes beyond community accessibility and there needs to be a wider appreciation of their positive contributions e.g. slowing water movements.	Change to be made	<p>It is recognised that green spaces can have significant and wide ranging benefits some of these are referenced in Assessment 7.</p> <p>At the time when nominations for Local Green Space designations are put forward, local communities will be encouraged to stipulate why the nominated green space is of importance, which may include functional benefits such as those referred to.</p> <p>Assessment 7 has been amended to incorporate further, more detailed guidance to assist with the evaluation of the site where consideration will be given to existing properties and opportunities that could help to mitigate against the effects of climate change.</p>
12		Consultation Question 9 (Selection Criteria)	Previous Local Greenspace nominations should be recognised.	No change	The Local Planning Authorities recognise that Local Green Spaces have been nominated previously and are looking at ways of capturing this information where representations have been duly made.

Comment ID	Company / Organisation (Consultee)	Consultation point	Comment summary	Summary Statement	Detailed responses
13		Consultation Question 15 (Mitigation of Climate Change)	Consideration should be given to positive site characteristics that might be lost if a greenspace was not protected through designation.	Change to be made	If a greenspace is not formally designated as a Local Green Space it does not necessarily mean that it will be developed and constructed upon. Assessment 7 has been amended to incorporate further, more detailed guidance to assist with the evaluation of the site where consideration will be given to existing properties and opportunities that could help to mitigate against the effects of climate change. This would include an assessment of the physical characteristics of the site.
14		Consultation Question 15 (Assessment of Green Space)	Local Green Spaces should not be considered in isolation, they may have wider values if they are part of a larger green network.	No change	The Local Planning Authorities recognise that Local Green Spaces can contribute to a wider green corridor or network of green spaces. The Local Planning Authorities will be using a biodiversity network approach as set out in the Joint Local Plan. The Local Planning Authorities will carefully consider wildlife records that are held including GIS mapping software to inform our assessment of sites put forward for designation.

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15	Hoe Neighbourhood Forum	Consultation Question 2 (5.2 LNR)	Support for the Local Green Space Development Plan Document. Consider that Local Nature Reserves should not be scoped out of the designation process.	No change	The Local Planning Authorities recognise the value of Local Nature Reserves, but do not consider it necessary to provide additional protection through a Local Green Space designation. Each Local Nature Reserve has a management plan that is agreed by Natural England; development within a Local Nature Reserve would require the de-designation of this land.
16	South West Water	JLP Local Green Space Development Plan Document Designation Criteria DRAFT	No comments on the Local Green Space Development Plan Document.	No change	No response required.
17		Assessment Methodology	Concerns raised over the methodology for designating Local Green Spaces, in particular, the assessment of sites that benefit from planning permission or have previously formed part of pre-application enquires. Reference made to a specific area of Plymouth.	No change	At this stage the Local Planning Authorities are not seeking nominations for greenspace designation nor formally appraising a greenspace sites' suitability for designation, rather seeking views on the criteria by which Local Green Space nominations will be assessed in the future.

<b>Comment ID</b>	<b>Company / Organisation (Consultee)</b>	<b>Consultation point</b>	<b>Comment summary</b>	<b>Summary Statement</b>	<b>Detailed responses</b>
18		Do you think it is a good idea to create a Local Green Space Development Plan Document for the Plymouth Policy Area?	Support for the Local Green Space Development Plan Document.	No change	No response required.
19		Consultation Question 2	Support for Assessment 2 criteria.	No change	No response required.
20		Do you think it is a good idea to create a Local Green Space Development Plan Document for the Plymouth Policy Area?	Support for Local Green Space Development Plan Document, reassurance sought that the document will not reduce the protection of other greenspaces.	No change	Once the Local Green Space Development Plan Document is adopted it will sit alongside the Joint Local Plan and become a tool for determining planning applications. Joint Local Plan policy DEV27 entitled 'Green and play spaces' will still apply and will continue to protect and support a diverse and multi-functional network of green space.
23		Consultation Question 2	Support for Assessment 2 criteria.	No change	No response required.
24		Consultation Question 3	Support that additional protection should be given to AONBs, green spaces within conservation areas and playing pitches through the designation of Local Green Spaces.	No change	No response required.
25		Consultation Question 4	Some green spaces could be designated as 'non-designated heritage assets'	No change	Non-designated heritage assets could benefit from further protection provided by Local Green Space status.

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26		Consultation Question 5	Agree that National Planning Policy Framework criteria for designating a Local Green Space has been met. Reference made to the National Planning Policy Framework being guidance rather than legislation.	No change	The National Planning Policy Framework sets out the Government's planning policies for England. The policies apply to the preparation of the Local Green Space Development Plan Document.
27		Consultation Question 6	Query regarding potential opportunities to review Local Green Space on extant planning applications.	No change	Planning applications with consent have a time limit for commencement imposed by the Local Planning Authorities. After an application is approved, it can take time to agree financial obligations, assemble and acquire land, appoint contractors etc. It would be unreasonable to approve a planning application and then introduce uncertainties regarding the potential use of that land for Local Green Space if the planning permission is extant. Such uncertainties would also make it difficult to monitor and forecast future developments in Plymouth.

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28		Consultation Question 7	Agree with question 7, but suggest figure 3.2 of the Local Plan should have been included in the consultation document. Local Green Space that is more than 400m from certain residential areas need not mean the Local Green Space is inaccessible.	No change	Each Local Green Space nomination will be assessed on an individual basis. The 400m measurement will be applied as a guide only, the Local Planning Authorities are aware there may be instances where a green space is located beyond this point, but forms part of the community as it the nearest accessible green space.
29		Consultation Question 8	Query regarding the maximum size limit of 10 ha. Green space within a conservation area should be included within the assessment.	No change	The 10 ha threshold is based on our open space assessment which classes sites of 10 ha and over as large sites. The Local Planning Authorities propose land within conservation areas can be designated for Local Green Space status.
30		Consultation Question 9	Support for Assessment 5.1.	No change	No response required.
31		Consultation Question 10	Suggestion that when a site is assessed regard should be had to whether information boards are publicly displayed.	Change to be made	The Local Planning Authorities will amend Assessment 5 to ensure that when an officer assessment is undertaken, regard is had to public information boards on display at the site.

<b>Comment ID</b>	<b>Company / Organisation (Consultee)</b>	<b>Consultation point</b>	<b>Comment summary</b>	<b>Summary Statement</b>	<b>Detailed responses</b>
32		Consultation Question 11	The assessment should also consider whether a greenspace acts like a park with features that make it attractive for recreational activities such as walking.	No change	There are many areas in Plymouth that function as a park and may be important to the local community for a variety of reasons. The Local Planning Authorities consider the matters raised are adequately addressed and will be considered as part of Assessment 5.
33		Consultation Question 12	Support for Assessment 5.5.	No change	No response required.
34		Consultation Question 14	The assessment should also take account of the City Council's 43 Sustainable Neighbourhood Assessments.	No change	The Sustainable Neighbourhood Assessments were completed in 2005 and 2006, in the Local Planning Authorities' view, this data is not very reliable as it was collated and representative of community views shared 14/15 years ago.
35		Consultation Question 16	Support for Assessment 7.	No change	No response required.
36		JLP Local Green Space Development Plan Document Designation Criteria DRAFT	Nomination of a site to be designated as Local Green Space.	No change	At this stage, the Local Planning Authorities are seeking views on the proposed Local Green Space designation criteria. The Local Planning Authorities will be asking local communities to nominate green spaces at the next stage of consultation.
37	Plymouth Open Space Network	JLP Local Green Space Development Plan Document Designation Criteria DRAFT	Support for the Local Green Space Development Plan Document.	No change	No response required.

<b>Comment ID</b>	<b>Company / Organisation (Consultee)</b>	<b>Consultation point</b>	<b>Comment summary</b>	<b>Summary Statement</b>	<b>Detailed responses</b>
38	Collings Park Trust	Do you think it is a good idea to create a Local Green Space Development Plan Document for the Plymouth Policy Area?	Support for the Local Green Space Development Plan Document.	No change	No response required.
39	Collings Park Trust	Consultation Question 5 (5.4 to 5.8)	Agreement the document meets the requirements of the National Planning Policy Framework.	No change	No response required.
40	Collings Park Trust	Consultation Question 6	Agreement that where there is a current allocation or extant planning permission the site should not be Local Green Space.	No change	No response required.
41	Collings Park Trust	Consultation Question 2	The listed designations in paragraph 5.2 afford sufficient protection and do not require a local greenspace designation.	No change	No response required.
42	Collings Park Trust	Consultation Question 3	Support that additional protection should be given to AONBs, green spaces within conservation areas and playing pitches through the designation of Local Green Spaces.	No change	No response required.
43	Collings Park Trust	Consultation Question 7	Agreement that Assessment 3 is an appropriate way of assessing whether the greenspace is within reasonably close proximity to the community it serves.	No change	No response required.

<b>Comment ID</b>	<b>Company / Organisation (Consultee)</b>	<b>Consultation point</b>	<b>Comment summary</b>	<b>Summary Statement</b>	<b>Detailed responses</b>
44	Collings Park Trust	Consultation Question 8	Agreement that Assessment 4 is an appropriate way of assessing whether the greenspace is an extensive tract of land.	No change	No response required.
45	Collings Park Trust	Consultation Question 11 (Assessment 5.3)	It is important to recognise that recreation can be both formal and informal. During a site assessment it might be difficult to observe all recreational benefits, such as gardening, it is therefore important to continue engaging with local community groups to obtain a greater understanding of how green spaces are used.	No change	The Local Planning Authorities recognise the importance and value of engaging with local communities and will continue to positively consult and engage with local people throughout the preparation of the Development Plan Document.
46	Collings Park Trust	Consultation Question 12 (Assessment 5.4)	The perceived level of tranquillity may not be representative during a site assessment, it is therefore important to engage with the local community and seek their views on Assessment 5.4.	No change	The Local Planning Authorities recognise the importance and value of engaging with local communities and will continue to positively consult and engage with local people throughout the preparation of the Development Plan Document.
47	Collings Park Trust	Consultation Question 13 (Assessment 5.5)	Evidence that could assist with Assessment 5.5 may be available through the local community.	No change	The Local Planning Authorities recognise the importance and value of engaging with local communities and will continue to positively consult and engage with local people throughout the preparation of the Development Plan Document.

Comment ID	Company / Organisation (Consultee)	Consultation point	Comment summary	Summary Statement	Detailed responses
48	Collings Park Trust	Appendix I: Draft Template for Collecting Local Green Space Assessments Against Criteria	An assessor may benefit from an accompanied site visit from the local community.	No change	To ensure the process is fair and objective, officers carrying out the assessment should not be accompanied by members of the public. Any relevant information for potential designation should be provided at the nomination stage.
49	Highways England	JLP Local Green Space Development Plan Document Designation Criteria DRAFT	No comments to make at this stage.	No change	No response required.
50	Tamerton Foliot Village Conservation Society	Do you think it is a good idea to create a Local Green Space Development Plan Document for the Plymouth Policy Area?	Support for the Local Green Space Development Plan Document.	No change	No response required.
51	Tamerton Foliot Village Conservation Society	Consultation Question 2	Does not agree that existing designations in paragraph 5.2 provide enough protection that a Local Green Space designation is not needed. Multiple designations will provide robustness. There is a risk that minor sites of importance to communities are not protected and designations can be repealed or amended.	No change	The application of multiple designations is not promoted by the National Planning Policy Framework, with which this document needs to comply.

<b>Comment ID</b>	<b>Company / Organisation (Consultee)</b>	<b>Consultation point</b>	<b>Comment summary</b>	<b>Summary Statement</b>	<b>Detailed responses</b>
52	Tamerton Foliot Village Conservation Society	Consultation Question 3	Support that additional protection should be given to AONBs, green spaces within conservation areas and playing pitches through the designation of Local Green Spaces.	No change	No response required.
53	Tamerton Foliot Village Conservation Society	Consultation Question 4	Agree no other designations from paragraphs 5.2 and 5.3 have been missed, however, suitable sites do not always have a statutory designation and can be judged independently using the criteria in paragraph 5.4.	No change	The assessment will be carried out in full for each nominated Local Green Space site.
54	Tamerton Foliot Village Conservation Society	Consultation Question 5	Agree that National Planning Policy Framework criteria for designating a Local Green Space has been met. Reference made to the National Planning Policy Framework being guidance rather than legislation.	No change	The National Planning Policy Framework sets out the Government's planning policies for England. The policies apply to the preparation of the Local Green Space Development Plan Document.

Comment ID	Company / Organisation (Consultee)	Consultation point	Comment summary	Summary Statement	Detailed responses
55	Tamerton Foliot Village Conservation Society	Consultation Question 6	Not in agreement that where there is a current allocation or extant planning permission that the site should not be Local Green Space.	No change	Planning applications with consent have a time limit for commencement imposed by the Local Planning Authorities. After an application is approved, it can take time to agree financial obligations, assemble and acquire land, appoint contractors etc. It would be unreasonable to approve a planning application and then introduce uncertainties regarding the potential use of that land for local Green Space if the planning permission is extant. Such uncertainties would also make it difficult to monitor and forecast future developments in the Plymouth Policy Area.
56	Tamerton Foliot Village Conservation Society	Consultation Question 7	No comments.	No change	No response required.
57	Tamerton Foliot Village Conservation Society	Consultation Question 8	Support for Assessment 4.	No change	No response required.

<b>Comment ID</b>	<b>Company / Organisation (Consultee)</b>	<b>Consultation point</b>	<b>Comment summary</b>	<b>Summary Statement</b>	<b>Detailed responses</b>
58	Tamerton Foliot Village Conservation Society	JLP Local Green Space Development Plan Document Designation Criteria DRAFT	Suggestion to engage with local groups as may raise factual issues not in the databases.	No change	The Local Planning Authorities recognise the importance and value of engaging with local communities and will continue to positively consult and engage with local people throughout the preparation of the Development Plan Document.
59	Tamerton Foliot Village Conservation Society	Consultation Question 17	No further suggestions to ways in which other urban spaces can help to address climate change.	No change	No response required.
60	Tamerton Foliot Village Conservation Society	JLP Local Green Space Development Plan Document Designation Criteria DRAFT	Suggestion that Local Green Space should include consideration of health (mental and physical) and social benefits in addition to climate change.	No change	The Councils recognise local green spaces can provide health and wellbeing benefits and are currently working with other Local Authorities to consider how best to assess and capture this information.
61		Do you think it is a good idea to create a Local Green Space Development Plan Document for the Plymouth Policy Area?	Agrees with creation of Local Green Space Development Plan Document. The process for designation should be simpler.	No change	The National Planning Policy Framework sets out specific criteria and circumstances through which Local Green Space can be designated. Local Green Space have to be designated through a Development Plan Document.

<b>Comment ID</b>	<b>Company / Organisation (Consultee)</b>	<b>Consultation point</b>	<b>Comment summary</b>	<b>Summary Statement</b>	<b>Detailed responses</b>
62		Consultation Question 2	Green verges and other spaces should have protection.	No change	The National Planning Policy Framework sets out the specific criteria and circumstances for the designation of Local Green Space. Whilst the Local Planning Authorities recognise the importance that verges and other spaces make to the local environment, they do not meet the criteria to be designated as Local Green Space.
63		Consultation Question 3	Designations listed in section 5.3 do not adequately protect sites from development. Current legislation does not fully protect the environment, the Local Planning Authorities need an effective Environmental Bill and strong laws to protect the environment.	No change	The Local Green Space Development Plan Document can only work within the parameters set out within the National Planning Policy Framework.
64		Consultation Question 4	The methodology does not cover smaller sites such as Orchards. Questions regarding funding for Plymstock Swimming Pool.	No change	The National Planning Policy Framework sets out the criteria and circumstances for the designation of Local Green Space. The Development Plan Document must meet with these guidelines to be found sound. The question regarding Plymstock swimming pool is not relevant to the Local Green Space Development Plan Document and should be picked up directly with the Residents Association.

Comment ID	Company / Organisation (Consultee)	Consultation point	Comment summary	Summary Statement	Detailed responses
65		Consultation Question 5	The criteria should cover smaller areas of greenspace.	No change	The National Planning Policy Framework sets out the specific criteria and circumstances for the designation of Local Green Space. Whilst the Local Planning Authorities recognise the importance that verges and other spaces make to the local environment, they do not necessarily meet the criteria to be designated as Local Green Space as set out in the National Planning Policy Framework.
66		Consultation Question 6	Strategies need re-thinking to reflect Climate Change Emergency.	No change	The Local Planning Authorities recognise the benefit which green spaces bring to the city in terms of climate change. This has been reflected within the methodology. However the Local Green Space Development Plan Document must meet with the parameters as set out within the National Planning Policy Framework.

Comment ID	Company / Organisation (Consultee)	Consultation point	Comment summary	Summary Statement	Detailed responses
67		Consultation Question 7	Not in agreement with Assessment 3. Sites are not always accessible; there should be green corridors as well as Local Green Space.	No change	The Local Planning Authorities recognise the important role which green infrastructure plays within the city. However the Local Green Space Development Plan Document must meet with the parameters as set out within the National Planning Policy Framework which states the Local Green Space designation should only be used where the green space is in reasonable close proximity to the community it serves.
68		Consultation Question 8	Not in agreement with Assessment 4. Green criteria is more important than extent of land.	No change	The Local Planning Authorities recognise the important role which green infrastructure plays within the city. However the Local Green Space Development Plan Document must meet with the parameters as set out within the National Planning Policy Framework which states the Local Green Space designation should only be used where the green space is not an expensive tract of land.

Comment ID	Company / Organisation (Consultee)	Consultation point	Comment summary	Summary Statement	Detailed responses
69		Consultation Question 9	Beauty is important, but subjective; Local Green Space must have significant natural, organic features.	No change	The National Planning Policy Framework states the Local Green Space designation should only be used where the green space is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historical significance etc. The methodology seeks to address these requirements and allows the assessment of features on the proposed site.
70		Consultation Question 10	More emphasis should be attributed to the benefits of Local Green Space "green" aspects.	No change	The methodology allows the assessment of a range of features on the site. Reference to any historical importance forms part of the assessment and meets the requirements of the National Planning Policy Framework.

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71		Consultation Question 11	Most criteria in Assessment 5.3 are appropriate, but sites used for specific sports should also include space for wildlife. Lights should not be left on when sites are not in use.	No change	The Local Planning Authorities recognise that sports sites and their settings can benefit communities and provide valuable habitats for wildlife. In accordance with the National Planning Policy Framework, Local Green Space can be designated if it demonstrably special, which could include its recreational value as a playing field and the richness of its wildlife.
72		Consultation Question 12	Volunteers could help provide evidence in relation to wildlife.	No change	The Local Planning Authorities recognise the importance and value of engaging with local communities and will continue to positively consult and engage with local people throughout the preparation of the Development Plan Document.
73		Consultation Question 13	Volunteers could help provide evidence in relation to wildlife.	No change	The Local Planning Authorities recognise the importance and value of engaging with local communities and will continue to positively consult and engage with local people throughout the preparation of the Development Plan Document.

Comment ID	Company / Organisation (Consultee)	Consultation point	Comment summary	Summary Statement	Detailed responses
74		Consultation Question 14	Not in agreement with Assessment 6; there must be flexibility to add new sites that are not already designated.	No change	The National Planning Policy Framework sets out specific criteria and circumstances through which Local Green Space can be designated. Local Green Space have to be designated through a Development Plan Document. During the next consultation, the Local Planning Authorities will be inviting nominations for sites that could become Local Green Space designations.
75		Consultation Question 15	The assessment methodology seems quite encompassing, but provision must be made to allow for new initiatives.	No change	The National Planning Policy Framework sets out specific criteria and circumstances through which Local Green Space can be designated. Local Green Space have to be designated through a Development Plan Document.
76		Consultation Question 16	Agree with Assessment 7	No change	No Response Required
77		Consultation Question 17	Green spaces can provide outdoor learning spaces, provide local employment for park keepers, rangers, walk leaders, forest school provision, rural crafts, marketing opportunities for cash crops and fruits. Local work and products reduce the need to travel, causing less pollution by reduced travel.	No change	The Local Planning Authorities recognise the benefit which green spaces bring to the city in terms of climate change. This has been reflected within the methodology. However the Local Green Space Development Plan Document must meet with the parameters as set out within the National Planning Policy Framework.

<b>Comment ID</b>	<b>Company / Organisation (Consultee)</b>	<b>Consultation point</b>	<b>Comment summary</b>	<b>Summary Statement</b>	<b>Detailed responses</b>
78	Plymouth Civic Society	Do you think it is a good idea to create a Local Green Space Development Plan Document for the Plymouth Policy Area?	Support for the Local Green Space Development Plan Document.	No change	No Response Required
79	Plymouth Civic Society	Consultation Question 2	General agreement with the designations listed in paragraph 5.2. Concerns raised regarding Local Nature Reserves, Registered Village Greens and Common Land.	No change	Local Nature Reserves, Registered Village Greens and Common Land are designated and protected through legislation.
80	Plymouth Civic Society	Consultation Question 3	Agreement that designations listed in paragraph 5.2 do not afford sufficient protection.	No change	No Responses Required
81	Plymouth Civic Society	Consultation Question 4	Suggestion that net zero carbon emissions has been omitted from paragraphs 5.2 and 5.3.	No change	The contribution which green spaces make to climate change is recognised within the methodology. No changes required.
82	Plymouth Civic Society	Consultation Question 5	Agreement that the Local Planning Authorities have reflected on and addressed National Planning Policy Framework requirements.	No change	No Responses Required
83	Plymouth Civic Society	Consultation Question 6	Ensure National Planning Policy Framework criteria are applied.	No change	Local Green Space should be consistent with local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. No Changes Required.

<b>Comment ID</b>	<b>Company / Organisation (Consultee)</b>	<b>Consultation point</b>	<b>Comment summary</b>	<b>Summary Statement</b>	<b>Detailed responses</b>
84	Plymouth Civic Society	Consultation Question 7	Agree with question 7	No change	No Responses Required
142	Plymouth Civic Society	Consultation Question 8	Agree with question 8	No change	No Responses Required
143	Plymouth Civic Society	Consultation Question 9	Agree with question 9	No change	No Responses Required
144	Plymouth Civic Society	Consultation Question 10	Agree with question 10	No change	No Responses Required
145	Plymouth Civic Society	Consultation Question 11	Agree with question 11	No change	No Responses Required
146	Plymouth Civic Society	Consultation Question 12	Agree with question 12	No change	No Responses Required
147	Plymouth Civic Society	Consultation Question 13	Agree with question 13	No change	No Responses Required
148	Plymouth Civic Society	Consultation Question 14	Agree with question 14	No change	No Responses Required
149	Plymouth Civic Society	Consultation Question 15	Agree with question 15	No change	No Responses Required
150	Plymouth Civic Society	Consultation Question 16	Agree with question 16	No change	No Responses Required
151	Plymouth Civic Society	Consultation Question 17	Agree with question 17	No change	No Responses Required

<b>Comment ID</b>	<b>Company / Organisation (Consultee)</b>	<b>Consultation point</b>	<b>Comment summary</b>	<b>Summary Statement</b>	<b>Detailed responses</b>
85	St Levan Park NHW	JLP Local Green Space Development Plan Document Designation Criteria DRAFT	What consideration will be given to restrictive covenants that might be relevant on some Local Green Spaces?	No change	The Local Planning Authorities are committed to engaging with landowners during the preparation stages of the Development Plan Document. When engaging with landowners, it is possible that additional information about the site will be made available, which may include information on restrictive covenants for example. Our primary objective for the Local Green Space Development Plan Document is to facilitate the bringing forward of local community aspirations for protecting green spaces in the city through the formal designation of Local Green Space. The Local Planning Authorities do not consider restrictive covenants relevant to the assessment process.
86	Devon Gardens Trust	Consultation Question 1	Support for the Local Green Space Development Plan Document.	No change	No Responses Required
87	Devon Gardens Trust	Consultation Question 2	Agree with question 2	No change	No Responses Required
88	Devon Gardens Trust	Consultation Question 3	Agree with question 3	No change	No Responses Required

<b>Comment ID</b>	<b>Company / Organisation (Consultee)</b>	<b>Consultation point</b>	<b>Comment summary</b>	<b>Summary Statement</b>	<b>Detailed responses</b>
152	Devon Gardens Trust	Consultation Question 4	Request to include sites on the Devon Gazetteer of Parks and Gardens of Local Historic Interest as they are considered important landscapes in the local context of Devon. The sites in Plymouth are Beaumont Park, Central Park, the Elizabethan Garden, Freedom Fields Park, the Royal Naval Hospital at Stonehouse, Radford Park, Mutley Park and Thorn Park. Suggestion that sites on the Devon Gazetteer of Parks and Gardens of Local Historic Interest should be added to the list in Assessment 2 and scoped out.	No change	During the next stage of consultation the Local Planning Authorities will be inviting nominations for Local Green Space designations when we will consider the suitability of individual sites such as those identified. The Local Planning Authorities are not in agreement that sites on the Devon Gazetteer of Parks and Gardens of Local Historic Interest should be added to the list in Assessment 2 and scoped out.
153	Devon Gardens Trust	Consultation Question 5	Agree with question 5	No change	No Responses Required
154	Devon Gardens Trust	Consultation Question 6	Agree with question 6	No change	No Responses Required
155	Devon Gardens Trust	Consultation Question 7	Agree with question 7	No change	No Responses Required
156	Devon Gardens Trust	Consultation Question 8	Agree with question 8	No change	No Responses Required
157	Devon Gardens Trust	Consultation Question 9	Agree with question 9	No change	No Responses Required

<b>Comment ID</b>	<b>Company / Organisation (Consultee)</b>	<b>Consultation point</b>	<b>Comment summary</b>	<b>Summary Statement</b>	<b>Detailed responses</b>
158	Devon Gardens Trust	Consultation Question 10	Agree with question 10	No change	No Responses Required
159	Devon Gardens Trust	Consultation Question 11	Agree with question 11	No change	No Responses Required
160	Devon Gardens Trust	Consultation Question 12	Agree with question 12	No change	No Responses Required
161	Devon Gardens Trust	Consultation Question 13	Agree with question 13	No change	No Responses Required
162	Devon Gardens Trust	Consultation Question 14	Agree with question 14	No change	No Responses Required
163	Devon Gardens Trust	Consultation Question 15	Agree with question 15	No change	No Responses Required
164	Devon Gardens Trust	Consultation Question 16	Agree with question 16	No change	No Responses Required
165	Devon Gardens Trust	Consultation Question 17	Agree with question 17	No change	No Responses Required
166	Devon Gardens Trust	JLP Local Green Space Development Plan Document Designation Criteria DRAFT	Specific reference to a site that is being identified for consideration as a Local Green Space.	No change	At this stage the Local Planning Authorities are not seeking nominations for greenspace designation nor formally appraising a greenspace sites' suitability for designation, rather the Local Planning Authorities are seeking views on the criteria by which local green space nominations will be assessed in the future.

Comment ID	Company / Organisation (Consultee)	Consultation point	Comment summary	Summary Statement	Detailed responses
89		JLP Local Green Space Development Plan Document Designation Criteria DRAFT	Green spaces should be used for recreation, in particular, teaching children to respect nature. People should be encouraged to come together to enjoy greenspace to ensure their viability.	No change	The Local Planning Authorities are in agreement that green spaces should be used for recreation and should be available for everyone to enjoy. The purpose of the Local Green Space Development Plan Document is to formally designate Local Green Spaces to ensure their protection to the benefit of local communities that can benefit from using them.
91		JLP Local Green Space Development Plan Document Designation Criteria DRAFT	Support for any efforts to save, improve and increase Plymouth's green spaces. Site specific nominations put forward for consideration.	No change	At this stage the Local Planning Authorities are not seeking nominations for greenspace designation nor formally appraising a greenspace sites' suitability for designation, rather the Local Planning Authorities are seeking views on the criteria by which Local Green Space nominations will be assessed in the future.
92	Historic England	JLP Local Green Space Development Plan Document Designation Criteria DRAFT	Support the production of Local Green Space Development Plan Document. Query over the assessments of alternative options through the Sustainability Appraisal Strategic Environmental Assessment.	No change	There will be further Sustainability Appraisal Strategic Environmental Assessment stages which will assess sites put forward as Local Green Space. There are no alternative options at this stage as the Local Planning Authorities are only consulting on the proposed methodology at this stage.

<b>Comment ID</b>	<b>Company / Organisation (Consultee)</b>	<b>Consultation point</b>	<b>Comment summary</b>	<b>Summary Statement</b>	<b>Detailed responses</b>
93	Historic England	Do you think it is a good idea to create a Local Green Space Development Plan Document for the Plymouth Policy Area?	Support the intention to create a Local Green Space Development Plan Document.	No change	No Responses Required
94	Historic England	Consultation Question 2	Registered Parks and Gardens are not protected by additional statutory controls or protection through the consent regime. Local Authorities are required to protect these through policies and allocations. There may be some Registered Parks and Gardens which could benefit from designation.	No change	The National Planning Policy Framework clearly outlines a duty for Local Planning Authorities to consider Registered Parks and Gardens within their policy making, allocations and subsequent planning decision; therefore the Local Planning Authorities do not see the need for further designation.
95	Historic England	Consultation Question 3	Support inclusion of green spaces within conservation areas.	No change	No Responses Required.
96	Historic England	Consultation Question 4	There may be parks, gardens and/or more informal open spaces that are non-designated assets which should be considered as potential Local Green Space.	No change	These could be considered for Local Green Space status and would be subject to the assessments within the designation criteria.

<b>Comment ID</b>	<b>Company / Organisation (Consultee)</b>	<b>Consultation point</b>	<b>Comment summary</b>	<b>Summary Statement</b>	<b>Detailed responses</b>
97	Historic England	Consultation Question 5	Agree with the inclusion of 'historic significance' as a characteristic to demonstrate that a Local Green Space is demonstrably special to a local community.	No change	No Responses Required.
98	Historic England	Consultation Question 6	Agree with the approach set out in Assessment I.	No change	No Responses Required.
99	Historic England	Consultation Question 7	Suggestion that Registered Parks and Gardens should not be scoped out. Advise that Historic England's National Heritage List for England (NHLE) is checked for information on historic assets.	No change	The National Planning Policy Framework clearly outlines a duty for Local Planning Authorities to consider Registered Parks and Gardens within their policy making, allocations and subsequent planning decision; therefore the Local Planning Authorities do not see the need for further designation.
100	Historic England	Consultation Question 8	No Comment.	No change	No Response Required.

Comment ID	Company / Organisation (Consultee)	Consultation point	Comment summary	Summary Statement	Detailed responses
101	Historic England	Consultation Question 9	Support for Assessment 5.2. Suggestion there may be overlap between Assessment 5.1 and 5.2. Recommend that officers consider a number of other sources of information including Historic England's National Heritage List for England (NHLE), Plymouth and Devon Historic Environment Records (HERs) and the Devon Local Register (DLR) of historic gardens and designated landscapes.	No change	During the next stage of consultation where Local Green Space nominations will be sought from the local community, the Local Planning Authorities will provide guidance on how sites can be nominated and the type of information that will help to support Local Green Space nominations this could include signposting to external sources of information such as those mentioned.
102	Historic England	Consultation Question 10	Recommend a number of other sources of information should be assessed. Revise key questions to set out that a fuller set of key information sources will be checked to see if there are designated or non-designated assets. May be beneficial to use local expertise too.	No change	During the next stage of consultation where Local Green Space nominations will be sought from the local community, the Local Planning Authorities will provide guidance on how sites can be nominated and the type of information that will help to support Local Green Space nominations. Through the engagement process, local communities will be encouraged to participate and share their local expertise when nominating Local Green Space sites that are of importance to them.

<b>Comment ID</b>	<b>Company / Organisation (Consultee)</b>	<b>Consultation point</b>	<b>Comment summary</b>	<b>Summary Statement</b>	<b>Detailed responses</b>
103	Historic England	Consultation Question 11	No comments	No change	No responses required.
104	Historic England	Consultation Question 12	No comments	No change	No Responses Required.
105	Historic England	Consultation Question 13	No comments	No change	No Responses Required.
106	Historic England	Consultation Question 14	Helpful to include signposts to useful historic information at the next stage of consultation to help local communities to understand the heritage significance of potential green space sites.	No change	During the next stage of consultation where Local Green Space nominations will be sought from the local community, the Local Planning Authorities will provide guidance on how sites can be nominated and the type of information that will help to support Local Green Space nominations.
107	Historic England	Consultation Question 15	Support the proposed assessment methodology subject to comments made.	No change	No Response Required.

Comment ID	Company / Organisation (Consultee)	Consultation point	Comment summary	Summary Statement	Detailed responses
108	Historic England	Consultation Question 16	<p>Some green spaces will be designated or non-designated heritage assets or may fall within the settings of heritage assets that make a contribution to their significance. Consideration will need to be given to this in Assessment 7 when considering if a site is appropriate for additional tree planting, surfacing changes and/or its capacity to incorporate additional recreational facilities, and low carbon or renewable technologies so as to strike an appropriate balance between saving energy and reducing carbon emissions, and sustaining heritage significance.</p>	No change	No Response Required.
109	Historic England	Consultation Question 17	No comment	No change	No Response Required.

Comment ID	Company / Organisation (Consultee)	Consultation point	Comment summary	Summary Statement	Detailed responses
110	Devon County Council	Consultation Question 4	The Mineral Consultation Area (MCA) and Mineral Safeguarding Area (MSA) should be taken into account when assessing the suitability of sites as Local Green Spaces.	Change to be made	Policy PLY5 in the Joint Local Plan states the Plymouth Local Planning Authority will work together with adjoining Local Minerals Authorities to support and facilitate the sustainable use of mineral reserves of national and local importance. Part 2 of this policy states that Mineral Safeguarding Areas will be identified so that long term minerals are not needlessly sterilised. During the screening process, the Local Planning Authorities will ensure that sites within a designated Mineral Safeguarding Area are scoped out as they are not considered suitable for Local Green Space designation. Where sites are identified within Mineral Consultation Areas, we will consult with our adjoining Local Minerals Authorities as appropriate to ensure informed decisions about Local Green Space designations are made.
111		Do you think it is a good idea to create a Local Green Space Development Plan Document for the Plymouth Policy Area?	Support for the Local Green Space Development Plan Document.	No change	No Responses Required.

Comment ID	Company / Organisation (Consultee)	Consultation point	Comment summary	Summary Statement	Detailed responses
141		Consultation Question 4	Suggest an additional criteria to assess the benefits of a site in providing space for exercise, recreation and refreshment in the event of local or nationwide viral infections.	No change	The Local Planning Authorities do not consider it necessary to add an additional criteria that considers assessing the benefits of a greenspace for exercise, recreation and refreshment associated with viral infections, rather the existing criteria considers these benefits at all times.
112	Rockspring Barwood (Plymouth) Ltd	Consultation Question 6	Agrees with Question 6 which suggests that land subject to a current allocation or extant planning permission should not be considered as Local Green Space. Concern that Assessment I does not explicitly discount allocated residential sites from being considered, instead only referencing allocations for "incompatible alternatives". Inclusion of pieces of land as Local Green Space within allocations would be contrary to National Planning Policy Framework paragraph 99 and limits the masterplanning exercise.	No change	As set out in Assessment I, Local Green Space sites that are within a policy allocation identified by the Joint Local Plan will not be supported where a conflict would occur between the intended use and a Local Green Space designation.

<b>Comment ID</b>	<b>Company / Organisation (Consultee)</b>	<b>Consultation point</b>	<b>Comment summary</b>	<b>Summary Statement</b>	<b>Detailed responses</b>
113	Plympton St. Mary Neighbourhood Forum	JLP Local Green Space Development Plan Document Designation Criteria DRAFT	Greenspaces in Plympton St Mary are set out in the Neighbourhood Plan and should be taken into consideration.	No change	Local Green Space allocations within the Plympton and St Mary Neighbourhood Plan will be retained.
114	Natural England	JLP Local Green Space Development Plan Document Designation Criteria DRAFT	Suggests potential SPAs, possible SACs, listed or proposed RAMSAR sites and sites that would be compensatory measures for adverse effects on habitat sites should also be scoped out in Assessment 2.	No change	European and International designated sites have been scoped out, however, the Local Planning Authorities feel sites that deliver compensatory measures could benefit from Local Green Space designation as their level of protection is less than the designated site itself.
115	Natural England	Consultation Question 13	Assumption that County Wildlife Sites and UK Biodiversity Action Plan (BAP) priority habitats would be viewed as significant in assessment 5.5, however, this should be clarified in the methodology assessment text.	No change	Our GIS mapping system holds current MAGIC information and local data from Devon Biodiversity Record Centre. All of the aforementioned will be used in assessing the nominated sites.

Comment ID	Company / Organisation (Consultee)	Consultation point	Comment summary	Summary Statement	Detailed responses
116	Marine Management Organisation	JLP Local Green Space Development Plan Document Designation Criteria DRAFT	The response is a standard response setting out the role and functions of the MMO. It states the MMO will review the Local Green Space document and if a bespoke response is required one would be submitted. The delivery functions of the MMO are: marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing European grants. The responses then sets out more detail under these headings. There are no specific comments in relation to the Local Green Space Methodology.	No change	No Responses Required
117 (Late representation received)		Do you think it is a good idea to create a Local Green Space Development Plan Document for the Plymouth Policy Area?	There is support in principle for the Development Plan Document.	No change	No Responses Required

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139  (Late representation received)		Consultation Question 8	Suggests defining a maximum size of parcel.	No change	Assessment 4 reviews the size of the land proposed for designation and proposes a maximum size limit of 10ha, including cumulative areas of adjacent green spaces.
140  (Late representation received)		JLP Local Green Space Development Plan Document Designation Criteria DRAFT	Concern raised about the level of designation in the rural areas of South Hams and regarding the future management of land. The response also sets out there should be compensation provisions in place where land loses its development hope value and open space in development should also be protected.	No change	The Local Green Space Development Plan Document will only cover the Plymouth Policy Area as set out within the Joint Local Plan, therefore, some of the concerns relating to the designation of sites within rural communities will not apply. With regard to the future management of sites, the process of designating Local Green Space does not require the production of management plans, rather the designation will provide greater protection of these green spaces.

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118  Late representation received - Extension of time agreed in advance of deadline)	Ministry of Defence	Do you think it is a good idea to create a Local Green Space Development Plan Document for the Plymouth Policy Area?	Supports the need for a Local Green Space Development Plan Document.	No change	No Response Required
119  Late representation received - Extension of time agreed in advance of deadline)	Ministry of Defence	Consultation Question 3	Agrees that designations listed in 5.3 do not exclusively protect them from development so Local Green Space designations are advantageous.	No change	No Response Required.
120  Late representation received - Extension of time agreed in advance of deadline)	Ministry of Defence	Consultation Question 5	Broadly agrees that the proposed designation criteria reflects National Planning Policy Framework and National Planning Policy Guidance. Local Green Space designation is onerous and criteria sets a high bar to achieve.	No change	The National Planning Policy Framework sets out the criteria and circumstances for the designation of Local Green Space. The Development Plan Document must meet with these guidelines to be found sound.

Comment ID	Company / Organisation (Consultee)	Consultation point	Comment summary	Summary Statement	Detailed responses
121  Late representation received - Extension of time agreed in advance of deadline)	Ministry of Defence	Consultation Question 6	<p>Agrees and welcomes that allocations and extant planning consents are excluded but suggests considering current land uses. Some MOD land is still used for military but is also a sports facility. Difficult for public to prove they have a connection with land that's restricted use. Allocating MOD land as Local Green Space would be contrary to National Planning Policy Framework para 95 with the need for the land to remain operational for defence reasons. See Daws Hill v Wycombe judgement on raising false expectation. Approach taken in Plymouth City Council's Plan for Playing Pitches para 3.34 for sites not to be included. Encourages designation to explicitly exclude sites in military use.</p>	No change	<p>The Local Planning Authorities are committed to engaging with landowners during the preparation stages of the Development Plan Document. When engaging with landowners, it is possible that additional information about the site will be made available, which may include information on land uses and the importance of safeguarding land for military use.</p>

<b>Comment ID</b>	<b>Company / Organisation (Consultee)</b>	<b>Consultation point</b>	<b>Comment summary</b>	<b>Summary Statement</b>	<b>Detailed responses</b>
122		Do you think it is a good idea to create a Local Green Space Development Plan Document for the Plymouth Policy Area?	The Council is promoting designations without adequate evidence and without the support of the local residents. Comments raised in relation to events at the Examination in Public. The Council is pursuing a strategy of designating overlapping Local Green Space without sufficient evidence.	No change	The consultation document is setting out the methodology by which future sites will be considered. There are no green space designations to consider at this stage. Sites will be considered through the methodology and will be subject to further consultation. The Local Planning Authorities will be inviting Local Green Space nominations at the next stage of consultation.
123		Consultation Question 2	It is recommended that each Local Green Space site nomination be considered on a case by case basis to ensure consideration is given to any overlapping designations.	No change	The methodology will ensure that each site put forward is tested on a consistent and robust basis.
124		Consultation Question 3	Agree with question 3.	No change	No Responses Required.
125		Consultation Question 4	It is recommended that each Local Green Space site nomination is considered on a case by case basis.	No change	The methodology will ensure that each site put forward is tested on a consistent and robust basis.

<b>Comment ID</b>	<b>Company / Organisation (Consultee)</b>	<b>Consultation point</b>	<b>Comment summary</b>	<b>Summary Statement</b>	<b>Detailed responses</b>
126		Consultation Question 5	The criteria for designation are set out in the National Planning Policy Framework and reframing these has confused their original intent. Concern the Council is relying on pre-existing evidence rather than setting out why sites are 'special' and of 'particular local importance'.	No change	The methodology will ensure that each site put forward is tested on a consistent and robust basis. The Local Planning Authorities recognise the need to ensure that evidence is up to date and sets out clearly why Local Green Space should be designated.
127		Consultation Question 6	Agree with question 6.	No change	No Responses Required.
128		Consultation Question 7	No opinion can be given regarding the methodology until it is being applied.	No change	The methodology will ensure that each site put forward is tested on a consistent and robust basis.
129		Consultation Question 8	The methodology is subjective and no opinion can be given until it is being applied. The Council must ensure that large tracts of land are not designated to achieve spatial separation.	No change	The methodology will ensure that each site put forward is tested on a consistent and robust basis. The Local Planning Authorities recognise the need to ensure that evidence is up to date and sets out clearly why Local Green Space should be designated.
130		Consultation Question 9	No opinion can be given regarding the methodology until it is being applied.	No change	The methodology will ensure that each site put forward is tested on a consistent and robust basis.

<b>Comment ID</b>	<b>Company / Organisation (Consultee)</b>	<b>Consultation point</b>	<b>Comment summary</b>	<b>Summary Statement</b>	<b>Detailed responses</b>
131		Consultation Question 10	No opinion can be given regarding the methodology until it is being applied. It is important that Heritage Assets are assessed for the contribution the site/setting makes to the asset not just the proximity to it.	No change	The methodology will ensure that each site put forward is tested on a consistent and robust basis.
132		Consultation Question 11	No opinion can be given regarding the methodology until it is being applied.	No change	The methodology will ensure that each site put forward is tested on a consistent and robust basis.
133		Consultation Question 12	The methodology provides a logical means of assessing tranquillity but this need to be assessed by national standards not at a local level.	No change	The methodology will ensure that each site put forward is tested on a consistent and robust basis.
134		Consultation Question 13	The methodology provides a logical means of assessing ecological value. No opinion can be given regarding the methodology until it is being applied.	No change	The methodology will ensure that each site put forward is tested on a consistent and robust basis.
135		Consultation Question 14	Disagree. The Council need to document and demonstrate the designation process is at the behest of the local community.	No change	The methodology will ensure that each site put forward is tested on a consistent and robust basis.
136		Consultation Question 15	The methodology contains a number of subjective thresholds. Need to ensure methodology is clear.	No change	The methodology will ensure that each site put forward is tested on a consistent and robust basis.

<b>Comment ID</b>	<b>Company / Organisation (Consultee)</b>	<b>Consultation point</b>	<b>Comment summary</b>	<b>Summary Statement</b>	<b>Detailed responses</b>
137		Consultation Question 16	The inclusion of climate change criterion is welcomed. No opinion can be tendered regarding the methodology until it is being applied.	No change	The methodology will ensure that each site put forward is tested on a consistent and robust basis.
138		Consultation Question 17	Assessment 7 is a sensible evaluation of climate change.	No change	No Responses Required.
167 Late representation received - Recognition given to being lost in post	Plympton St Maurice Civic Association	Consultation Question 3	Draws attention to Plymouth's Appraisal and Management Plan which states significance of open spaces in adding to the setting of conservation areas. Two site specific nominations put forward for consideration as Local Green Space within Plympton St. Maurice Conservation Area.	No change	The Local Authorities recognise that Green spaces within Conservation Areas could be further protected by the effect of a Local Green Space allocation which forms part of the assessment methodology (paragraph 5.3). At this stage, the Local Planning Authorities are not seeking nominations for greenspace designation nor formally appraising a greenspace sites' suitability for designation, rather the Local Planning Authorities are seeking views on the criteria by which local green space nominations will be assessed in the future.

## APPENDIX IV

Following the Regulation 18 Part 1 Consultation, the proposed changes to the Local Green Space Methodology and Designation Criteria are as follows:

### **Proposed Change 1:**

Amendment to Assessment 5 to ensure regard is had to public information boards on display at the site and details are recorded on the Local Green Space Designation Form.

### **Proposed Change 2:**

Amendment to Assessment 2 to ensure that where a Local Green Space proposal is within a Minerals Safeguarding Area, it is scoped out of the designation process. Where a site is within a Minerals Consultation Area, we will engage with the Local Minerals Authorities on the acceptability of the Local Green Space designation to ascertain the suitability of the site for Local Green Space designation.

### **Proposed Change 3:**

Amendment to Assessment 7 to provide more detailed guidance to assist with the evaluation of the site to ensure consideration is given to existing properties and opportunities that could help to mitigate against the effects of climate change.