



CONSULTATION STATEMENT

FEBRUARY 2020



1. Introduction

- 1.1 This Consultation Statement has been produced for information only and forms the first stage (Regulation 18¹) in the preparation of a Local Green Space Development Plan Document (LGS DPD) for what is known as the Plymouth Policy Area (as defined in the Plymouth and South West Devon Joint Local Plan²). In addition to the area administered by Plymouth City Council, the Plymouth Policy Area also includes land within South Hams and facilitates the need for Plymouth City Council and South Hams District Council to prepare a joint plan.
- 1.2 Engagement on the preparation of the LGS DPD will commence on 7th February 2020 and run for a period of 6 weeks until 23rd March 2020. Engagement will continue as the document evolves and progresses. The production timetable for the LGS DPD is set out within Section 5 of this document.
- 1.3 Once further consultation stages have been completed, the LGS DPD will be submitted and assessed by the Planning Inspectorate who will decide whether the plan is 'sound'. The final decision to adopt the document will be made by the Full Council of Plymouth City Council and South Hams District Council (anticipated in winter 2022).

2. Why prepare a LGS DPD?

- 2.1 The Joint Local Plan (JLP) was submitted to the Secretary of State in July 2017 and contained a set of Local Green Space (LGS) designations covering the Plymouth Policy Area, which had been developed in partnership with local communities. As a result of discussions which took place at the hearings into the JLP, the Inspectors expressed concerns regarding the evidence base supporting the LGS designations and gave the JLP Councils the opportunity to remove them from the JLP and to consider other ways to protect green spaces in the city. As a result, the JLP does not contain any LGS designations. Instead, the Councils are producing the LGS DPD which will set out designations for the Plymouth Policy Area, which will remedy the concerns that were expressed by the Inspectors regarding the evidence base.
- 2.2 The LGS DPD will cover the Plymouth Policy Area, however, the identification of LGS designations in the DPD will not prevent neighbourhood plans from identifying their own LGS sites across the whole of the Joint Local Plan area.
- 2.3 During the preparation stages of the LGS DPD, the Councils will be providing the opportunity for local communities to identify green spaces that are special to them. In particular, during the second consultation stage to be held in Autumn

¹ The Town and Country Planning (Local Planning) (England) Regulations 2012

² <https://www.plymouth.gov.uk/sites/default/files/PoliciesMapPPA.pdf>

2020, communities will be asked to comment on proposed Local Green Space designations and will be encouraged to put forward other potential green space sites that are considered to be of importance and suitable for allocation.

- 2.4 All designations within the LGS DPD will have been suggested by local communities during periods of consultation. Green Spaces in Plymouth are well protected by existing policy from a planning perspective, but a formal allocation as a LGS will add additional importance and recognition of their role to local communities.
- 2.5 Our primary objective for the LGS DPD 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'.
- 2.6 Within this context the LGS DPD will aim to:
- Identify the sites that are appropriate for Local Green Space allocation;
 - Ensure that important Local Green Spaces in the Plymouth Policy Area are sufficiently protected from inappropriate development;
 - Clearly articulate why the green spaces put forward for allocation are exceptional to the satisfaction of the Inspector at the examination;
 - Consider whether green spaces can help make Plymouth and the wider area more resilient to climate change challenges; and
 - Consider the benefits of green space in helping to mitigate the impacts of climate change.
- 2.7 The LGS DPD is supported by a Sustainability Appraisal and Strategic Environmental Impact Assessment (SA/SEA) that will be published at key stages in the document's preparation. The SA/SEA document is instrumental in the preparation of a development plan document and is subject to public consultation.
- 2.8 Once adopted, the LGS DPD will be a material planning consideration when making decisions and will sit alongside the JLP as part of the development plan for the Plymouth and South Hams local administrative areas.

3. Aims of the consultation

- 3.1 The purpose of this consultation is to seek views on the methodology and the criteria the Councils are proposing to use to assess whether or not green spaces in the city should be designated as 'Local Green Spaces'. We are particularly interested in receiving feedback on the questions that are set out within the Local Green Space Designation Criteria Consultation Document.

- 3.2 The consultation provides an opportunity to set out whether or not you agree with the Local Green Space Designation Criteria that will form part of the methodology for allocating LGS and if not, to suggest changes to the document. All comments made will be fully considered.

4. Engagement principles

- 4.1 Both LPAs have developed the consultation in line with the principles set out in the draft SCI:

Engagement principle	How is the principle being met?
Appropriate, meaningful and relevant	To ensure the consultation is appropriate, meaningful and relevant, the language used to advertise and promote the consultation has been written in Plain English. The LGS DPD Designation Criteria is set out within a technical document and anyone struggling to understand the consultation process or anyone with any questions regarding the document are encouraged to get in touch.
Integrity and honesty	The aims of the consultation above are clearly identified.
Equality and diversity	Everyone with an interest in influencing how development decisions are made in the Plymouth Policy Area is encouraged to comment on the consultation documents (LGS DPD Designation Criteria and SA/SEA). To ensure accessibility, the Councils are accepting comments in a number of ways, including via the Council's consultation portal, e-mail and post. To ensure specialist groups relevant to the consultation are aware of it, officers will be available to attend meetings as appropriate.
Open and fair	The consultation will run for a period of six weeks.
New technology and e-consultation	The consultation will be based online and promoted via social media and e-newsletter, as well as through traditional methods. Whilst responses received on social media will not be considered as formal representations, the Councils will report the amount of involvement there has been and the issues that have been raised in online discussions where it is appropriate.
Climate Emergency	The consultation has been designed to minimise printing by designing a predominantly online consultation program.
Responsibility and accountability	All comments made in relation to the consultation will be summarised in a response report that will be published.

4.2 The Councils have also agreed to the following:

- To ensure the consultation is legally compliant and meets data protection requirements;
- To manage cooperatively and efficiently the consultation/engagement processes so that it is fair, transparent and fluid;
- To ensure each local authority runs engagement/consultation periods in parallel to each other as part of a seamless process;
- To ensure all released information is up-to-date and available on each Councils' website throughout the process;
- To use the JLP branding when designing and publishing promotional material; and,
- To be visible, engaging and to ensure it is clear how/when comments can be made.

5. Key dates for the preparation of the LGS DPD

5.1 An outline of the anticipated timetable for the preparation, consultation and adoption of the LGS DPD is as follows:

	Activity	Date
1	Regulation 18 Stage 1 Consultation On the criteria for designating local green spaces	7 th February – 23 rd March 2020
2	Regulation 18 Stage 2 Consultation On the updated Plymouth Open Space Assessment evidence base and sites allocated for Local Green Space	Autumn 2020
3	Regulation 19 Consultation On the draft LGS DPD	Winter 2020
4	Submission to the Planning Inspectorate	Spring 2021
5	Examination	Summer 2021
6	Adoption	Winter 2022

6. Processes and engagement methods

Making representations

6.1 The public consultation on the LGS DPD designation criteria will run from Friday 7 February 2020 to 5pm on Monday 23 March 2020. During the consultation period, we will also accept comments on the supporting Sustainability Appraisal/Strategic Environmental Assessment. The Councils will only accept comments if they are "duly made" i.e. if they are received in a written format with a name and address supplied. Comments made verbally or anonymously will not be accepted.

6.2 The preference is for representations to be made through the online consultation portal: <https://plymouth-consult.objective.co.uk/portal/planning/jlp/>

however, comments will also be accepted via e-mail to plymouthplan@plymouth.gov.uk or strategic.planning@swdevon.gov.uk or via post to Joint Local Plan Team, Plymouth City Council, Ballard House, West Hoe Road, Plymouth, PL1 3BJ.

- 6.3 All comments will be published online and will be made available for public inspection on the website.
- 6.4 To ensure the Councils are compliant with data protection, it will be made clear via our communication streams how data will be stored and processed. Standard wording (**APPENDIX 1**), adapted for each communication channel will be used.
- 6.5 Responses received on social media will not be considered as formal representations in relation to consultations, however, the Councils will report the amount of involvement there has been and the issues that have been raised in online discussions where it is appropriate.
- 6.6 The LGS DPD designation criteria document is technical and anyone struggling to understand the consultation process or anyone with any questions regarding the document is encouraged to get in touch.

Consultation portal

- 6.7 The public consultation will be managed online through the same online consultation portal used for the JLP:
<https://plymouth-consult.objective.co.uk/portal/planning/jlp/>.

Publicity and promotional material

- 6.8 Whilst both LPA's will produce their own material to promote the consultation, common language and the JLP branding will be used.
- 6.9 Paper copies of the documents will not be printed, instead posters will be distributed to libraries and other public buildings as appropriate advertising the consultation.
- 6.10 The consultation will be publicised using a combination of the following methods:
- Corporate websites, ensuring the LGS DPD criteria designation document and supporting SA/SEA is available to view online in each required format (plain text and PDF) and are up to date with the relevant information;
 - Newsletters announcing the start and end of the consultation across both authorities;
 - E-mails to specialist groups;
 - Press releases;
 - Posters;
 - Social media:
 - Twitter
 - Facebook

- And via other methods as appropriate.

6.11 Given the detailed and technical nature of the LGS DPD criteria designation document, no consultation events are planned. However, officers will attend specific forum meetings as and when appropriate.

7. After the consultation

7.1 Once the consultation has closed, both Councils will consider all of the comments received during the consultation period.

7.2 A summary report will be published providing information on the comments received at the end of each consultation stage.

APPENDIX 1: Data protection, standard wording

The information collected as part of this consultation is to support the process of community planning and the ongoing preparation of the development plan. Any comments made cannot be treated as confidential and may be made publicly available on the Council's website. The information collected will be shared between Plymouth City Council and South Hams District Council.

We will never share or use your information for marketing purposes. Your data will be stored and processed in line with the principles of the Data Protection Act 2018. You have certain rights under the Data Protection Act and the EU General Data Protection Regulations (GDPR), which include the right to access, rectification and erasure. To enforce these rights or enquire about any other aspects of data protection in Plymouth please contact: Data Protection Officer, Plymouth City Council, Ballard House, West Hoe Road, Plymouth PL1 3BJ, Email: dataprotectionofficer@plymouth.gov.uk or contact the Data Protection Officer at data.protection@swdevon.gov.uk for South Hams District Council.

Plymouth City Council (registration number: Z7262171) and South Hams District Council (registration number: Z5955131) are registered as a data controller with the Information Commissioner's Office.