INTRODUCTION

1. This paper has been prepared in response to the Hearing session on Matters 7 and 9 when the boundaries of the Strategic Green Spaces (SGS) and the inclusion of private land within the SGS allocations were discussed and additional information requested by the Inspectors.

2. This paper provides detail on where the public and private land is located within each of the SGS allocations, the justification for including private land within the allocations, how this has worked for large-scale parks that were allocated in previous planning policy documents and how it supports and is justified in the JLP. The note also highlights in particular the boundary justifications for the two SGS that were highlighted during the Hearing session for Matter 7, Derriford Community Park and the Plym Valley.

3. We hope this note will assist the Inspectors in dealing with this aspect of the examination with reassurance that the SGS allocations are sound, effective and justified.

THE POLICY

4. The Strategic Greenspaces all have individual allocations to reflect the local environmental, social features and functions.
   - PLY19 - Central Park Strategic Greenspace
   - PLY41 - Derriford Community Park Strategic Greenspace
   - PLY45 - Plym Valley Strategic Greenspace
   - PLY49 - Sherford Community Park Strategic Greenspace
   - PLY54 - Saltram Countryside Park Strategic Greenspace
   - PLY44 - Woolwell sustainable urban extension and community park

5. SGSs are also is referenced in policy DEV29.
   - 1. Development that would result in an unacceptable conflict with the function (s) or characteristics of Strategic Green Spaces and Local Green Spaces will be resisted. In these areas, development will normally only be permitted where it enhances the value of the green space, for example through sports, allotment and play provision, lighting, cafes, educational uses and sustainable transport routes.

SGS Boundaries

6. At the Hearing of Matters 7 and 9 the boundaries of the Plym Valley SGS and Derriford Community Park SGS were discussed. It was questioned whether the boundaries as proposed were fully evidenced and justified.
7. The evidence that has been used to justify the allocation of each of the SGS sites is detailed in EN31 Section 2, table 1 in particular. This table does not give any evidence for the Woolwell SGS as the boundary and functions of this Park will be developed in tandem with the development of the new community as detailed in PLY44.

**Derriford Community Park SGS**

8. The evidence to support the allocation of the Derriford Community Park and justify the boundary has been developed for over 10 years through the master planning process. The JLP Councils’ response to Matter 7, Plymouth Policy Area Strategies CS7 – question 7.3 (iii)) sets out the process the Councils went through in developing the Derriford Community Park SGS including the extensive consultation that has been undertaken. The Councils are therefore confident that the SGS is fully justified.

**Plym Valley SGS**

9. The evidence used to develop the boundary for this site and its inclusion within the JLP started with the two references within the GI Delivery Plan (EN5). The site allocation was then developed utilising evidence within a number of the other documents within the Examination Library particularly;

- Plym Valley Landscape Character and Heritage Assessment (EN10/10A)
- Plymouth & Plymouth Urban Fringe Landscape and Seascape Assessment (EN22);
- The 2008 Green Space Strategy (EN4), its supporting Background report (EN4B),
- GI Delivery Plan (EN5)
- Plymouth Open Space Assessment 2017 (EN34 & EN34A).

10. To assist in demonstrating how these evidence base documents were used to inform the allocation and particularly the drawing of the boundary for this site, Appendix 1 of this note draws attention to the specific parts of the evidence base that was used.

11. The Plym Valley SGS is not only important for the functions it delivers such as providing a high quality landscape context for the City but also in ensuring that the growth of the area does not have a negative impact on European Protected Sites. The JLP HRA (SUB10) makes reference to the Plym Valley within section 12.3.9 – Proposed Avoidance / Mitigation Measures. This section sets out how a network of greenspaces sites will form part of the plan in order to deliver high quality sites for all kinds of recreation in order to provide an alternative to visiting sensitive sites on Dartmoor. With regards the Plym Valley Site it specifically states:

- Woolwell urban extension is 2.4km from Shaugh Prior Woods, part of South Dartmoor Woods so there is a risk of increased recreational pressure arising from this development. However, the urban community park, combined with the links to the Plym Valley Strategic Greenspace will mean that pressures on the more remote Dartmoor sites is less likely as more suitable sites for recreation are provided close by.
- The Plym Valley is a second strategic greenspace for the area, providing an alternative to visiting the sensitive Dartmoor sites, therefore avoiding any impacts.

12. We hope this is useful in demonstrating the evidenced justification for this site and why the Councils deem the site to be an integral part of the Plan.

**SGS Inclusion of Private Land**

13. The question of the inclusion of private land within the SGS sites was raised within Hearing sessions that discussed Matters 7 and 9. Participants particularly referenced the inclusion of private land in the Derriford and Plym Valley SGS sites. The Councils are confident that the inclusion of private land within a SGS allocation is fully justified and aligns with the requirements of the NPPF. The appropriateness of the inclusion of private land within strategic green space sites and has also been tested on sites that have been allocated in previous policy documents and shown to be successful and effective.

14. As was stated in the Hearing session there would be no legal or other requirement for private landowners to operationally manage their land in a certain way or to allow public access to the land as a result of the policy. Although some parts of each of the SGS would have a recreational function being part of a SGS allocation did not require the entire site to be publicly accessible.

**Alignment with the NPPF**

15. Each of the SGS sites have an individually tailored policy to fit with the environmental assets, local context and functions that the sites can provide to support the growth of the City. In addition to other functions, each of the sites delivers an important biodiversity and landscape role. The NPPF sets out the need for Local Planning
Authorities to contribute to the enhancement of the natural environment by establishing ecologically coherent ecological networks (para 109 and 117) and to set out a strategic approach to planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure (para 114).

16. These key sites are therefore based on justified and evidenced boundaries that will enable the delivery of coherent networks. The delivery of these important sites as part of a wider network would be greatly compromised if only public land was included within the policy boundaries. It would lead to sites that had artificial boundaries (such as cutting through the middle of a woodland) that would not be capable of delivering the functions and services required to support sustainable development.

Previous Allocated Sites

17. To provide confidence that this type of allocation is justified and deliverable we would refer to the Saltram Countryside Park (CP). This has been a strategic greenspace allocation since the 2007 adoption of the North Plymstock Area Action Plan (https://www.plymouth.gov.uk/northplymstockareaactionplanadopted). Saltram CP (policy NP11) was allocated to provide a range of functions from recreation to biodiversity enhancement delivering a multi-functional role in the same way as the SGS sites within the JLP. The Saltram CP is owned partly by the National Trust, Plymouth City Council and the Woodland Trust but also over 40 private landowners. The allocation of this land has proven to successfully protect and enhance the special features of the area without impinging on the day to day operations of the private land holdings.

Public and Private Land within the SGS sites.

18. It has been requested that it is detailed which land within each SGS is publicly or privately owned. Maps showing the ownership for the sites are within Appendix 2 where there is a mix of ownership:

- **Map 1 Derriford Community Park** - The majority of this Park is owned by Plymouth City Council. Some of the land is owned by another public body and is formally designated as a Local Nature Reserve which has open public access. There are a few areas of the SGS site that are privately owned. These areas have been included due to their importance in retaining ecological coherence and/or the landscape character of the area.

- **Map 2 Plym Valley** – A large area of this site is in the ownership or control of public bodies or organisations that encourage public access. The inclusion of wider areas is due to their important in retaining ecological coherence and/or the landscape character of the area and is described in detail in Appendix 1.

- **Map 3 Central Park** – The majority of the site is owned by Plymouth City Council. Ford Park Cemetery is owned by the Ford Park Cemetery Trust (http://www.ford-park-cemetery.org/index.php) whose aims, detailed below align seamlessly to the SGS allocation. Trust aims are as follows:
  - To preserve and manage Ford Park Cemetery as a safe, beautiful and accessible burial ground.
  - To cherish and make better known its heritage of history, architecture, sculpture and landscape.
  - To maintain the Cemetery as an open space of beauty and peace for all Plymothians, and to preserve and propagate the wildlife which it supports

- **Map 4 Saltram Countryside Park** – Part of this site is owned by the National Trust, Plymouth City Council or the Woodland Trust. The remainder of the site is in private ownership. This ranges from Drakes Memorial Park and Persimmon Developments to individuals that own a single field.

- **Sherford** – This site is entirely owned by the Consortium of developers that are delivering the new community therefore no ownership map has been produced.

- **Woolwell** – This site will be brought forward as an integral part of the new community and the developers will therefore control the ownership of the entire Park. No map is therefore provided for this site.
19. The Councils developed the network of SGS sites to support the sustainable growth of the City. The sites are fully justified by evidence and align with the requirements of the NPPF. The inclusion of private land within the SGS sites has been proven to be an effective way to protect and enhance the natural services an area can deliver. The exclusion of privately owned land from these allocations would significantly undermine the effectiveness of the policy and in the view of the Councils render the Plan unsound.
APPENDIX 1
PLYM VALLEY – Strategic Green Space Boundary Definition Clarification

INTRODUCTION

This paper has been prepared in response to the Hearing session on Matter 9 which took place on Tuesday 20th March 2018, and was raised earlier during Matter 7. Participants in the Hearings questioned whether the boundary of the Plym Valley SGS was based on robust evidence and fully justified. It was also highlighted to the Inspector that it was thought that the boundary of the Plym Valley SGS in the JLP was a larger area than the site that was set out in the Green Infrastructure Delivery Plan (2011) and the extension had not been justified.

The Councils are confident that the SGS is fully justified and its inclusion within the JLP is a key requirement as not only does the site deliver specific functions such as ecological connectivity it also supports the wider growth agenda. It is part of the network of SGS sites that will ensure that the growth of the area does not have a negative impact on European Protected Sites. The JLP HRA (SUB10) refers to the Plym Valley within section 12.3.9 – Proposed Avoidance / Mitigation Measures. This section sets out how a network of greenspaces sites will form part of the plan in order to deliver high quality sites for all kinds of recreation in order to provide an alternative to visiting sensitive sites on Dartmoor. With regards the Plym Valley Site, it specifically states:

- Woolwell urban extension is 2.4km from Shaugh Prior Woods, part of South Dartmoor Woods so there is a risk of increased recreational pressure arising from this development. However, the urban community park, combined with the links to the Plym Valley Strategic Greenspace will mean that pressures on the more remote Dartmoor sites is less likely as more suitable sites for recreation are provided close by.
- The Plym Valley is a second strategic greenspace for the area, providing an alternative to visiting the sensitive Dartmoor sites, therefore avoiding any impacts.

This paper draws out the specific pieces of evidence that we utilised from the Examination Library to justify the boundary of the Plym Valley SGS. We hope this will assist the Inspectors in dealing with this aspect of the examination with reassurance that the Plym Valley SGS allocation is sound, effective and justified.

THE POLICY

The Plym Valley Strategic Green Space policy is set out in PLY45.

PLY45 - Plym Valley Strategic Greenspace:

The Plym Valley forms an important landscape, wildlife and recreation site on the edge of the city. Its functions will be protected and improved to enhance the sites ability to support the growth of the Plymouth Policy Area by:

1. The delivery of a strategic access network across the site which encourages active recreation in a manner which is sensitive to the sites natural and historic assets and the working landscape.
2. Providing new and improved connections to adjacent communities and enhanced walking and cycling links to encourage visits by sustainable means.
3. Delivering landscape scale biodiversity enhancement across the site.
4. Ensuring the landscape value of the site is protected and enhanced and the site continues to provide a strong natural edge and attractive setting for Plymouth.
5. Protecting and enhancing the wealth of historic assets within the valley as part of the sites development ensuring people have the opportunity to appreciate and learn about the heritage of the area.
6. Supporting the development and enhancement of facilities to support the visitor experience across the valley in locations and with a design and form that is sensitive to the special qualities of the site and support the long term sustainable management of the valley.
7. Supporting the continuation of forestry and farming as a sustainable way of maintaining the function and value of the site but ensuing the practises take full account and support the special values of the site.
8. Supporting the development of appropriate recreational activities within the valley providing they are sensitive to the functions and values of the site.

Plym Valley SGS Development Process

The Plym Valley Strategic Green Space have been informed by various evidence base documents, which are available in the examination library. We have included within this note maps showing the various designations, wildlife, heritage and landscape data relevant to the boundary definition of the Plym Valley.

The starting point was how the site was referenced in the Green Infrastructure Delivery Plan (EN05). The site was included in two projects. The Plym Valley Project (pg 39-43) which details an active project to open up access and interpret the heritage of the area. This area was highlighted specifically as there was a need to develop further access provision in an area of the Plym Valley that already had a high level of recreational pressure. The GI Delivery Plan also includes theme projects. The larger area of the Plym Valley is specifically referenced in the ‘Biodiversity and Landscape Connection’ project (pg 84-87 (map on pg 87)). This map does not provide a hard boundary but does highlight the importance of the wider Plym Valley area for biodiversity and landscape. This area did include private land. It was deemed important that the landscape and biodiversity functions of the area were recognised on natural boundaries to enable ecological networks and ensure artificial boundaries, that did not reflect the situation on the ground, did not compromise the ability of the site to deliver the natural services required to support growth.

The SGS was also informed by the following pieces of evidence:

- Plymouth and Plymouth Urban Fringe Landscape & Seascape Assessment (EN22);
- Plymouth Policy Area Open Space Assessment 2017 (EN34),
- Biodiversity Network Creation Process 2017 (EN30),
- Plym Valley Connections Heritage Lottery Fund Project: Landscape Character and Heritage Assessment 2013 (HLF bid) (EN10 & EN10A);
- Green Space Strategy 2008 (EN4), the GS Background report (EN4B),
- GI Delivery Plan (EN5).

This note highlights the detailed pieces of evidence within these documents that were used to shape the site allocation and justifies its inclusion within the JLP. The evidence has been grouped according to the following themes:

- Landscape & Heritage;
- Open Space, Green Space & Green Infrastructure; and
- Biodiversity;

LANDSCAPE & HERITAGE EVIDENCE

There are two key pieces of landscape and heritage evidence. The 2013 HLF bid (Plym Valley Connections Heritage Lottery Fund Project: Landscape Character and Heritage Assessment 2013) (EN10 & EN10A) and the Plymouth & Plymouth Urban Fringe Landscape and Seascape Assessment (EN22). Both studies provide a detailed assessment of the landscape of the Plym Valley area.
The 2013 HLF bid

The 2013 HLF bid (EN10 & EN10A) included a Landscape Character and Heritage Assessment (LCHA) for the Plym Valley, which was compiled to support a Stage I application for a Landscape Partnerships Heritage Lottery Fund bid for the Plym Valley Connections Project. The bid identified and acknowledged that the Plym Valley provides an exciting opportunity to connect communities with the area’s rich and varied heritage in a manner which enhances important, but currently at risk features, whilst also providing opportunities for exploration, learning, recreation and relaxation. The LCHA identified two different landscape areas within the proposed Plym Valley Strategic Green Space boundary (see extract below):

<table>
<thead>
<tr>
<th>Landscape Character Area</th>
<th>Characteristics</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bickleigh Wooded Valley 4A</td>
<td>Fast flowing, ice blue waters of the River Plym. Incised river valley cloaked in mature woodland of knarled oaks and mossy carpets. Numerous heritage assets, those most notable related to industrial and transportation along the valley. Isolated dwellings and hamlets of local vernacular.</td>
</tr>
<tr>
<td>Tory Brook Wooded Valley and Boringdon Hill Farmlands 4B</td>
<td>Rising landform with long distance views over the Plym to Plymouth possible. More intimate, wooded landscape around Newnham Park to the east. Notable historic assets such as Boringdon Arch and Boringdon Camp.</td>
</tr>
</tbody>
</table>

The HLF bid set out the following Priority Action Areas:

- Creation of outdoor visitor hub at Cann Woods.
- Enhancement of Plym Valley corridor for biodiversity.
- Protection of heritage assets at risk and restoration of tramways.
- Prevention of habitat fragmentation and degradation, control of proliferation of confer plantations.
- Cann Wood glade development and broadleaf woodland reinstatement.
- Enhancement and diversification of visitor facilities – canoe/cycle hire.

This Landscape Character Area was deemed a ‘backbone’ character area for the Plym Valley HLF bid as it functions as a central linking feature to surrounding landscape character areas and therefore was included in its entirety within the HLF-bid boundary.
Only the inclusion of historic assets such as Boringdon Hall, Boringdon Arch and Newnham Park were proposed to be actively pursued as a project within the HLF-bid due to the specific funding requirements of the scheme.

The Plymouth and Plymouth Urban Fringe Landscape and Seascape Assessment (EN22)

The Plymouth and Plymouth Urban Fringe Landscape and Seascape Assessment (EN22) was developed to respond to the growth agenda in Plymouth and to provide an evidence base to inform decisions that affect the landscape within the city and its surrounding urban fringe. This study aims to develop a stronger understanding of the character and sensitivity of the landscapes within and surrounding the City. In the Plym Valley Area, the assessment defines 3 Landscape Character areas, which helped to shape the boundary of the Plym Valley Strategic Green Space boundary.

### Figure 2.2: Plymouth Character Areas and Character Types

#### Figure 3.1: Urban Fringe Study Area and Sensitivity Assessment Areas

<table>
<thead>
<tr>
<th>1. CA10: Plymbridge Wooded Valley</th>
<th>Summary of valued landscape attributes/sensitive features:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>• The peaceful and tranquil qualities of the Character Area, particularly valued as an accessible greenspace to many Plymouth residents.</td>
</tr>
<tr>
<td></td>
<td>• Valued semi-natural habitats including those designed as part of the Plym Valley Woods County Wildlife Site, as well as large tracts of ancient woodland.</td>
</tr>
<tr>
<td></td>
<td>• Valued geological sites at Bickleigh Vale Quarry and Mainstone Quarry which are designated as RIGS.</td>
</tr>
<tr>
<td></td>
<td>• Important archaeological features which tell the story of the valley’s industrial heritage.</td>
</tr>
<tr>
<td></td>
<td>• The role of the Character Area as a wooded backdrop to the north east of the city of Plymouth, and rural transition into South Hams.</td>
</tr>
<tr>
<td>Guidance and opportunities to consider within this Character Area are as follows:</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Protect valued areas of ancient and broadleaved woodland, riparian habitats and regionally important geological sites.</td>
</tr>
<tr>
<td></td>
<td>• Protect the setting of archaeological sites and features related to the landscape’s industrial heritage.</td>
</tr>
<tr>
<td></td>
<td>• Avoid siting any new development in the most elevated locations above the valley, where it will affect the locally distinctive wooded skyline.</td>
</tr>
<tr>
<td></td>
<td>• Use the landform, dense woodland cover and features such as former quarries to screen any new development or land uses (as seen currently at the old quarry site at Wood Park).</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>2. CA 13: Boringdon Park Farmland</th>
<th>Summary of valued landscape attributes/sensitive features:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>• Historic features within the landscape including the Grade I Boringdon Hall and the nationally designated Triumphal Arch.</td>
</tr>
<tr>
<td></td>
<td>• Long, open views to the city and its seascape setting, including the Laira and Cattewater (CA 28), central and southern Plymouth, Plymouth Sound (CAs 29 and 30) and beyond.</td>
</tr>
<tr>
<td></td>
<td>• Intervisibility between the Character Area and Dartmoor National</td>
</tr>
</tbody>
</table>
### Park/Cornwall AONB

- The role of the landscape as a rural, undeveloped ridgeline backdrop to Plympton.
- The tracts of ancient woodland and semi-natural broadleaved woodland and grassland valued in an
- Intensive agricultural and amenity landscape.

**Guidance and opportunities to consider within this Character Area are as follows:**

- Protect the setting and historical integrity of Boringdon Hall and its surrounding grounds, as well as the Triumphal Arch.
- Conserve and protect the integrity of the landscape’s valued semi-natural habitats, including ancient woodland and dense hedgerows which support a variety of birdlife.
- Pursue opportunities to extend habitats, including as part of a Green Infrastructure network, utilising native, climate-resilient species wherever possible (e.g. strengthening links between hedgerows, trees and woodlands).
- Avoid siting development on the most prominent slopes and ridgeline which form a rural backdrop and sense of containment to Plympton.
- Protect the open, uninterrupted views across central and southern Plymouth and the city’s seascape setting, including the Laira and Cattewater (CA 28), Plymouth Sound (CAs 29 and 30) and glimpses of Rame Head within the Cornwall AONB.
- Protect current levels of intervisibility between the landscape and Dartmoor National Park, and consider the special qualities of the protected landscape in any proposals.
- Utilise dips in topography and existing tree cover to effectively screen any new development or land uses.

### 3. UF 04: Bickleigh Vale and Cann Wood

**Summary of valued landscape attributes/sensitive features:**

- The Scheduled Monument of Boringdon Camp Iron Age hillfort and the other industrial heritage features found within the landscape.
- The wider setting the area provides to the protected landscape of Dartmoor National Park, particularly in the north.
- Valued semi-natural habitats including those locally designated such as Cann Wood and Great Shaugh Wood.
- The landscape’s wooded skylines, rising up above Plymouth to the west and south-west.
- The remnant medieval field pattern, particularly around Boringdon Park and Bickleigh.

**Guidance and opportunities to consider within this Character Area are as follows:**

- Protect the setting and integrity of historical features within the landscape including Boringdon Camp Iron Age hillfort.
- Protect the wider setting to the protected landscape of Dartmoor National Park in the north of the area. Ensure development does not detract from the special qualities of the Park.
- Protect the character of the landscape's distinctive wooded skylines and other prominent rural sites, such as the elevated slopes around Lower Upperton and Cann Wood.
- Conserve, appropriately manage and enhance the landscape’s valued tracts of ancient and semi-natural woodland, wetlands and grasslands, including those designated as County Wildlife Sites.
- Pursue opportunities to extend and link woodland, wetland and semi-natural grassland habitats, including as part of a Green Infrastructure network, utilising native, climate-resilient species.
- Explore further opportunities for access and enjoyment of the landscape, including links to the West Devon Way and areas of open access land at Cann Wood (including as part of future development proposals).
- Ensure that any new development reflects and respects the current scale of the landscape and its component patterns and features.
- Use the landscape’s high levels of tree cover and sloping landform to help screen any new development or land uses into their landscape setting.
Landscape Input in the Boundary Definition of the Plym Valley Strategic Green Space

Both landscape studies define the Plym Valley and its associated slopes (CA10 & 4A) as a tranquil landscape feature shaping the north-western edge of Plymouth especially valued as an important site for biodiversity, accessible green space with a variety of heritage features, which tell the story of the valley’s industrial heritage. Due to the aforementioned, the majority of defined character areas CA10 & 4A have been included in the Plym Valley Strategic Green Space.

CA13 and Parts of UF04 (4B in the HLF-bid) have been included within the Plym Valley Strategic Green Space in line with NPPF paragraph 115 as these areas consist of the elevated mainly wooded land with intervisibility with either the protected landscape of Dartmoor National Park, particularly in the north, or the designated landscape of the Cornwall AONB, to the south. The area also offers views of Plymouth and its associated seascape mainly from the southern parts of the area. Both Character areas (and 4B HLF-bid defined landscape character area) are also described as providing a treed skyline shaping the setting of Plymouth, which both the recent landscape assessment and the HLF-bid landscape assessment consider to be a valued and sensitive attribute of the area.

Besides identifying the landscape character areas that make up Plymouth’s landscape scale green spaces, the Plymouth and Plymouth Urban Fringe Landscape and Seascape Assessment (EN22) also considers intervisibility within the JLP boundary and its sensitive neighbouring landscape context (e.g. Dartmoor National Park). For the Plym Valley area it shows the following:

The above provides a clear further justification for the inclusion of CA13: Boringdon Park Farmland and parts of UF04: Bickleigh Vale and Cann Wood within the Plym Valley Strategic Green Space as this landscape character is highly visible and therefore assists in shaping the setting of Plymouth, Dartmoor National Park and the Cornwall AONB. JLP policy PLY45 – Plym Valley Strategic Green Space in point 4 aims to provide a strong natural edge and attractive setting for Plymouth. The boundary of the Plym Valley Strategic Green Space has broadly been drawn to follow the woodland boundary instead of the Landscape Character areas as it is specifically the woodland features which shape the naturalistic edge of Plymouth.

OPEN SPACE, GREEN SPACE & GREEN INFRASTRUCTURE EVIDENCE

The 2008 Green Space Strategy (EN4), it is supporting Background report (EN4B), and the GI Delivery Plan (EN5) formed the basis for Plym Valley SGS allocation within the JLP. Additional GI related evidence, such as the Plymouth Open Space Assessment 2017 (EN34 & EN34A), helped to inform the extension and location of the Plym Valley Strategic Green Space from a GI perspective.

The Green space strategy 2008-2023

The Green Space Strategy 2008-2023 (EN4) goal is to aid protection and improvements to Plymouth’s accessible green space and play space. The strategy sets out a vision, aims and objectives based on a robust evidence base,
which together deliver a strategic framework for the planning and management of accessible green space, play space and allotments. It aims to coordinate and improve decision-making in relation to the planning and management of green space including investment and management decisions covering a plan period till 2023. The Strategy has a Plymouth focus, but also reference cross-border green space planning with neighbouring authorities.

The Plym Valley Strategic Green Space designation in the JLP is a progression of the objectives set out in the 2008-2023 Green Space Strategy, which states the following in relation to the Plym Valley: ‘Objective GSS21: Cross-Border Green Space Planning - To enhance green and blue space links between Plymouth and its surrounding countryside through an integrated approach to the planning and management of accessible green space and coast in the Plymouth sub-region’. The report further mentions: ‘Plymouth’s urban fringe and surrounding countryside contains a wealth of natural assets, including Dartmoor National Park, two Areas of Outstanding Natural Beauty, Plymouth Sound and Estuaries European Marine Site, National Trust estates at Wembury, the Plym Valley and Salttram Park and Mount Edgcumbe Country Park. This high quality green and blue infrastructure needs to play a key role in the city’s sustainable development and regeneration. To achieve this we need to work closely with our neighbours to ensure it becomes a place where the many demands for access and recreation placed upon it complement each other. With a large section of Plymouth’s residential growth to be concentrated on its borders with other neighbouring Local Authorities, there is a need for a co-ordinated approach to managing the urban fringe’s natural and historic assets in the context of the increased pressures and opportunities this growth will bring’. The aforementioned ambitions are carried forward and strengthened in the Plym Valley Strategic Green Space designation.

Plymouth’s Green Space Strategy 2008 to 2023 – Background Report

Plymouth’s Green Space Strategy 2008 to 2023 – Background Report (EN4B) provides the background information and an evidence base to accompany the Green Space Strategy. It sets out the links between the Strategy and other strategies and policies at local, regional and national level. It describes how data for the Strategy has been collected and analysed. It also examines what the data says about the current state of green space in Plymouth, which has informed the development of the vision, objectives and actions in the main Strategy.

The background report brings together the outcomes from various assessments and audits (including the Greenscape assessments of 2000 & 2004), which helped to inform the below figures. Figure 9 of the background report (shown below) defines areas within the Plym Valley as ‘Local’ Green Spaces, meaning green spaces mainly visited by local residents (and does not equate to Local Green Space as defined within the JLP policy DEV29); ‘City’ Green Space, meaning green spaces visited by people from across Plymouth; and other green space, which can be classed as inaccessible green spaces. The map identifies the Plym Valley as a Green Space of city importance. Further the map indicates a deficiency in Accessible Green Space within the area south east of the Plym Valley, which forms

part of the proposed JLP Plym Valley Strategic Green Space. Therefore the Strategic Green Space designation should be considered to help address an established local need.

Figure 8 of the background report (as shown above) identifies the accessible part of the Plym Valley as excellent quality accessible green space. This forms a further justification for designating this area as Strategic Green Space as it would assist in protecting and enhancing this area for the future. Both figures are based on the Greenscape assessments of 2000 & 2004 (site forms are included within the Appendices of this report).

The Green Space Strategy only defined the sites within the Plymouth City Council boundary, which is why the entire Plym Valley SGS is not shown. It does however demonstrate the importance of the woodland area that is directly adjacent to the urban form of Plymouth. Although the entire area is not publicly accessible, some areas are fully open to the public (areas owned by National Trust) whilst through the rest of the site there are footpath routes.

Plymouth's Green Infrastructure Delivery Plan

Plymouth’s Green Infrastructure Delivery Plan (ENS) is a document that was developed as a proactive response to Plymouth’s growth agenda and provides a coordinated, cross-boundary approach to managing and enhancing the natural assets of Plymouth and its surrounding countryside. The GI Delivery Plan identifies the strategic interventions that need to be delivered by 2021 to allow the city to grow sustainably, by creating new, enhancing existing and successfully linking GI assets. The Plan provides details on key themes, individual projects and network enhancements that have been identified by stakeholders as key to the delivery of a robust and effective GI network.

The GI Delivery Plan identifies the Plym Valley and Cann Woods as an existing site important for recreation and highlights it for enhancements. Map 1 included in the report (see extract below) shows a clear project boundary for the Plym Valley Woods Project to be delivered by 2021. The map also shows further existing GI Assets, which are currently not linked to specific projects to be implemented during the plan period covered by the delivery plan.

Map 13 of the GI Delivery plan (see extract below) indicates the Biodiversity & Landscape Connections project. The map clearly shows an area extending beyond the defined project boundaries as set out on map 1 in which it is proposed to retain and protect the biodiversity and landscape value in support of the growth of the area. Map 13 clearly indicates the area to the south-east currently proposed to be included within the Plym Valley Strategic Green Space Designation as forming part of this landscape protection area. It should therefore be considered that the JLP Plym Valley Strategic Green Space designation only strengthens the protection of an area already acknowledged in the GI delivery Plan to be of great landscape value to the setting of Plymouth.
The map also indicates an area of Landscape Improvements, which mean enhancements to improve the visual amenity of the area, to the north-east of the proposed Plym Valley Strategic Green Space. The proposed green space designation is extended north to respond to the growth agenda within this area (allocation PLY44). Most of the green spaces within this extended green finger were already identified within the Green Space Strategy and GI.
delivery Plan (supported by the Greenscape Assessment of 2000/2004) as an already existing Green Infrastructure Assets. The Plym Valley Strategic Green Space designation is therefore a justified allocation that utilise evidence from numerous studies to define the current boundary and functions for the site.

The GI Delivery Plan defines deliverable projects to support growth within a certain time frame, e.g. 2008-2021. This time frame is drawing to a close. Therefore to support the further growth of Plymouth a new proactive response to Green Infrastructure is needed of which the Plym Valley Strategic Green Space is one of the answers. This is in accordance with Natural Environment NPPG paragraph 29 (Reference ID: 8-029-20160211). The Strategic Green Space designation builds on the ambitions and projects set out in GI Delivery Plan 2008-2021 and expands them to meet the further growth of Plymouth.

The 2017 Plymouth Open Space Assessment

The 2017 Plymouth Open Space Assessment (EN34 & EN34A) was prepared as a robust evidence base for the JLP process. This assessment forms the main source of information on open space within Plymouth and parts of South Hams District that border Plymouth (the Plymouth Policy area, see map below). It updates and brings together previous work undertaken on the city’s open spaces including Plymouth’s Green Space Strategy 2008-2023 and the Greenscape Assessment 2000/2004 with a new audit of the city’s open spaces.

The study identifies the area in which the Plym Valley is located encompassing the following green space uses within the Plym Valley Strategic Green Space designation (see map below):

- Natural and Semi-Natural Green Space,
- Amenity Green Space,
- Outdoor Sports Facilities, and
- Agricultural land

It also highlights the important multifunctional nature of the site (fig 9.2). This is a key reason why it was incorporated into the network of SGS sites as it makes such an important contribution to supporting the growth of the area as it delivers numerous natural services.
The Open Space Assessment further identifies the current provision of accessible green spaces within the Plym Valley area to be especially deficient in the southern and northern ends of the valley corridor as demonstrated on the snippet from Figure 8.7 (included in the Open Space Assessment) below.
The above demonstrates the importance of the Plym Valley as an accessible multi-functional green space and the necessity to improve and expand the area to meet current needs and the needs of the proposed future urban growth.

Green and Open Space Input in the Boundary Definition of the Plym Valley Strategic Green Space

The proposed Plym Valley Strategic Green Space allocation forms a continuation of the Plymouth Green Space Strategy 2008-2023 (EN4) and the accompanying Background Report (EN4B), and Plymouth’s Green Infrastructure Delivery Plan 2008-2021 (EN5) and forms the local implementation of NPPF paragraph 114. The aforementioned set of documents define Plymouth wide GI objectives as well as deliverable projects to support Plymouth’s growth within a certain time frame, e.g. 2008-2021/2023. This time frame is drawing to a close. Therefore to support the further growth of Plymouth a new proactive response to Green Infrastructure is needed of which the Plym Valley Strategic Green Space designation is one of the answers. This accords with Natural Environment NPPG paragraph 29 (Reference ID: 8-029-20160211).

The need for a further expansion of the Plym Valley as it was defined in the Green Space Strategy and the GI delivery plan is demonstrated within the 2017 Open Space Assessment, which clearly indicates a current deficiency in good quality accessible green space within the north and southern parts of the Plym Valley, which the Strategic Green Space designation aims to address and future proof by extending its boundary. This will not only meet current needs but also the needs of the future growth of Plymouth as set out in the JLP.

The current Plym Valley as demonstrated within the Open Space Assessment 2017 already delivers a multitude of functions including public access (e.g., a large part of the area within the designated is already accessible to the public, either free public access or through defined paths). The Strategic Green Space designation aims to protect and improve these functions and to safeguard them for the future, whilst allowing for growth to take place. The above approach accords with Natural environment National Planning Practice Guidance paragraphs 029 and 030, which promote the use of Green infrastructure to deliver and to be an integral part of sustainable development.

BIODIVERSITY EVIDENCE

As part of the JLP process in accordance with national policies (NPPF paragraph 117) a Biodiversity Network across the JLP plan area was identified. The current biodiversity network for the Plymouth Policy Area as included in the JLP is based on the initial survey work by Devon Biodiversity Records Centre. This initial survey of Plymouth led to the establishment of potential County Wildlife Sites (pCWS) (defined as all priority one habitats, except for those that were too small e.g. woodlands less than 2 ha and grasslands less than 0.5 ha), Key Network Features (included
all priority one habitats that were too small to be pCWS and all Priority 2 habitats such as secondary woodland, semi-improved grassland and replanted ancient woodland) and identified all Priority 3 habitats and wildlife corridors (e.g. water courses, railway embankments, etc.). In 2014 this network was reviewed and updated to reflect the current situation on the ground. A further review and update took place in 2015 to ensure Plymouth’s Biodiversity Network accords with Lawton Report ‘Making Space for Nature’ (2010). This resulted in the expansion of the network to include all green spaces within Plymouth except for private gardens and pitches and a revision of the used terminology to be:

- **Core Sites** – European Sites, Sites of Special Scientific Interest, Ancient Woodland, National Nature Reserves, Marine Conservation Zones, Local Nature Reserves, County Wildlife Sites and RIGS.
- **Future Core Sites**: Cirl Bunting Enhancement Zones, Greater Horseshoe Bat Sustenance Zones.
- **Corridors or Stepping Stones** – These include Strategic Nature Areas, Other Sites of Wildlife Interest (OSWI), river corridors and the B-lines corridors (which were created by a collaboration between South Hams District Council and Buglife and identify key corridors for pollinators) and Greater Horseshoe Bat strategic flyways.

In 2017 the Plymouth biodiversity network was combined with the networks of JLP plan partners resulting in the following network around the Plym Valley area shown below:

The SGS site incorporates the areas of Core site and Stepping stones sites to deliver an ecological coherent network. The designation will support the retention and enhancement of this important biodiversity feature.

### ADJOINING ALLOCATIONS

The identification of the strategic green spaces has also been made in the context of the proposed development allocations. Of particular relevance to the Plym Valley are the allocations at Woolwell (PLY44), Coypool (PLY53) and Boringdon Park (PLY60.1). Each of these allocations contains provisions for how they will link and support the delivery of the Plym Valley Strategic Green Space.

The Plym Valley Strategic Green Space designation abuts allocations PLY44, PLY53 & PLY60. These allocations all include provisions for how they will link in and support the delivery of the Plym Valley Strategic Green Space.

The above allocations demonstrate a clear link with the Plym Valley Strategic Green Space designation to meet the requirements for sustainable development as set out under NPPF paragraph 7. The Plym Valley Strategic Green Space will assist the aforementioned allocations to meet the social and environmental aspects of sustainable development. It will support healthy communities, by creating a high quality built environment with accessible local services that reflect the communities’ needs and support its health, social and cultural well-being. It will also
contribute to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity.

**APPROACH TO DEFINING THE SGS BOUNDARY**

The evidence base documents detailed above formed the basis of detailing the boundary of the SGS. However, there was a need, particularly to refine the exact lines, particularly where they abut the City. In these cases, the evidence base documents were supplemented by site visits.

In general, the western boundary follows the extent of woodland cover along the Plym Valley to protect the naturalistic edge the woodland cover (a large amount of this is ancient woodland) provides to Plymouth, to retain and enhance its wildlife functions and to ensure where public access into the spaces is provided it is preserved. Where the evidence documents incorporated private housing, the housing and the curtilage of the house were removed from the boundary and are show as white areas within the allocation. The definition of curtilage that we referred to was as follows -

"the curtilage of a house or dwelling is the land immediately surrounding it, including any closely associated buildings and structures, but excluding any associated "open fields beyond"."

Therefore, areas of private land that go beyond the direct curtilage of the house were included in the boundary as they formed part of the functions of the site, i.e. woodland, agricultural land. The definitions whether it was curtilage or open land were defined through mapping and site visits. Where an objection was raised during the consultation period to an area of land being included, a site visit was conducted with the objector and a decision whether to amend the boundary was made.

The eastern boundary of the site again in principle follows the extent of the woodland cover (for the same reasons as listed above for the eastern boundary) and is drawn to include the full extent of Boringdon Park Farmland Landscape Character Area CA13 except for the areas covered by allocations PLY53 & PLY60.

To the north of Boringdon Park Farmland Landscape Character Area CA13 the Plym Valley Strategic Green Space boundary includes the northern edge of Boringdon Park (listed a Local Park & Garden) and the wooded valley slope near Old Newham Farm as they help shape the setting of Boringdon Park Farmland Landscape Character Area CA13. The boundary also includes Boringdon Camp hillfort, a Scheduled Monument.

The northern boundary is set to create a green infrastructure link to allocation PLY44 and forms the northern extent of the JLP boundary. Allocation PLY44 includes provisions to ensure suitable links, appropriate buffers to and contributions for the delivery of improvements to the strategic green space are secured. This will improve the functioning of the Plym Valley Strategic Green Space, which in turn will guarantee allocation PLY44 meets its requirements of sustainable development under NPPF paragraph 7.

Agricultural buildings and existing development providing opportunities to enjoy the landscape and experience the areas biodiversity (e.g. Golf Course, etc…) were assumed not to conflict with the purpose of the Plym Valley Strategic Green Space designation as set out in points 7 & 8 of JLP policy PLY45 and were therefore included within the proposed designation area.

**Summary**

The Plym Valley SGS has been developed over many years utilising numerous studies and projects. The SGS as included in the JLP has been fully evidenced, and is justified. It forms and important part of the SGS network in delivering natural services to support growth and to prevent negative impacts on sensitive protected sites. The boundary of the site is based on studies and site visits and responds to the needs of the City without placing new requirements on private landowners.

The Councils deem the inclusion of the Plym Valley SGS as set out in the JLP a key part of the sustainable growth of the area, in line with the requirements of the NPPF and is required to ensure the soundness of the Plan.
Overview of the Submitted Documents utilised in defining the Plym Valley SGS

1. Strategic Landscape Area Identification Process 2017 (EN28)
2. Plymouth Greenspace Policy Development Process 2017 (EN31)
3. Plymouth and Plymouth Urban Fringe Landscape & Seascape Assessment sheets (EN22 & EN22A):
   - CA10 - Plymbridge Wooded Valley
   - CA13 - Boringdon Park Farmland
   - UF04 - Bickleigh Vale and Cann Wood
   - UF05 - Newham and Hemerdon Wooded Farmland
4. Plymouth Policy Area Open Space Assessment Sheets 2017 (EN34 & EN34A):
   - 1 - Plym Valley
   - 4 - Woodford (North Plympton)
   - 12 - Lower Plym Valley- Leigham Woods
   - 62 - Rasleigh Avenue Woods
   - 123 - Land East of Dark Lake View
   - 178 - Glen Holt Woods
   - 192 - Peacock Meadow
   - 271 - Pattison Drive South
   - 324 - Rasleigh Avenue Open Space
   - 374 - Wheatridge Road Open Space
   - 431 - Wrigley's
   - 511 - Boringdon Golf Course
   - 512 - Boringdon Camp
   - 513 - Plym Valley East
   - 517 - Near West Wood
   - 520 - Woodland Belt 1
5. Biodiversity Network Creation Process 2017 (EN30)
6. Plym Valley Connections Heritage Lottery Fund Project: Landscape Character and Heritage Assessment 2013 (including figures) (EN10 & EN10A)
7. Plymouth’s Green Space Strategy 2008 to 2023 (EN4)
8. Plymouth’s Green Infrastructure Delivery Plan (ENS)
9. Greenscape Assessment 2004 Update sheets (Helped to inform EN4B)
   - N050 - Land at Plymbridge Road
   - N095 - Land East of Darklake View
   - N096 - Lower Plym Valley
   - N110 - Peacock Meadow
   - N123 - Land south of Holt Wood Road, Glenholt
10. Greenscape Assessment 2000 sheets (Helped to inform EN4B)
    - C12 - Open Space, South Pattinson Drive
    - C14 - Leigham Woods
    - T12 - Rasleigh Avenue
    - T13 - Woodford
    - T15 - Colebrook Quarry
    - T16 - Plym Valley