The Plympton St Mary Neighbourhood Plan was submitted to Plymouth City Council on 15 October 2018. The Council consulted on the submitted plan for a six week period from 2 November 2018 to 14 December 2018 in accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations.

The table below sets out the representations received on the Plympton St Mary Neighbourhood Plan during this consultation period. These responses were sent to the independent examiner, Mr Martin S Lee, on 17 December 2018.

### Table 1: Responses to Regulation 16 Consultation

<table>
<thead>
<tr>
<th>Date</th>
<th>Full Name</th>
<th>Organisation Details</th>
<th>Comments</th>
<th>Supporting Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>02/11/2018</td>
<td>Sally Parish</td>
<td>Highways England</td>
<td>Dear Planning Team, Thank you for providing Highways England with the opportunity to comment on the submission version of the Plympton St Mary Neighbourhood Development Plan. Highways England is responsible for operating, maintaining and improving the strategic road network (SRN) which in this case consists of the A38 which forms part of the southern boundary of the plan area. We are satisfied that the plan's proposed policies are unlikely to lead to development that will adversely affect the SRN and we therefore have no specific comments to make. However, any large scale development that may come forward within the plan area will need to be supported by a suitable assessment of traffic impacts in line with the requirements of DfT Circular 02/2013 The Strategic Road Network and the Delivery of Sustainable Development. These comments do not prejudice any future responses Highways England may make on site specific applications as they come forward through the planning process, which will be considered by us on their merits under the prevailing policy at the time. Kind regards, Sally</td>
<td></td>
</tr>
<tr>
<td>05/11/2018</td>
<td>Paul Shepherd</td>
<td>Devon &amp; Cornwall Police</td>
<td>I refer to the above the content of which is noted and upon which we have no specific comment other than to advise that we are aware of the potential development sites referenced in the document. Regards Martyn Dunn Development Coordinator</td>
<td>Appendix 1</td>
</tr>
<tr>
<td>07/11/2018</td>
<td>Martyn Dunn</td>
<td>South West Water</td>
<td></td>
<td>Appendix 2</td>
</tr>
<tr>
<td>11/12/2018</td>
<td>Mrs Corine Dyke</td>
<td>Natural England</td>
<td>Thank you for your consultation on the above dated 02 November 2018. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. We welcome the progression of the Plympton St Mary Neighbourhood Plan towards Examination. We have one minor comment in the</td>
<td>Appendix 2</td>
</tr>
<tr>
<td>Date</td>
<td>Full Name</td>
<td>Organisation Details</td>
<td>Comments</td>
<td></td>
</tr>
<tr>
<td>------------</td>
<td>---------------</td>
<td>----------------------</td>
<td>----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td></td>
</tr>
</tbody>
</table>
| 24/11/2018 | Mr Philip Warren |                      | I am writing in support of the PSMN Plan. I believe the plan reflects what a lot of people in the ward and in Plympton generally feel about the area. Because of its location Plympton is hampered by existing road layouts which cause a lot of frustration. However it is accepted that the Policies in this plan can only address future issues and cannot influence what is already in place. Bearing that in mind I think the Vision Statement and Objectives are sound and in many ways present a common sense approach. Providing adequate housing for an increasing demand is a tricky area. Most people would not want to see more green fields taken over for housing. Therefore making the most of brownfield sites is crucial. In particular the Coypoold development is very important in this aspect even though it will bring with it further road transport issues. In particular I fully support the policies relating to the Environment and Green Space. Being an active person myself I think it is a necessity that people in this country should have good access to green space near to where they live. This should not only allow for physical access but should also meet emotional needs through a feeling of being in an open green area. That is why even small pockets of green space are a valuable and desired asset. 
P. G. Warren |
<p>| 30/11/2018 | Spencer Jefferies | National Grid        | Specific Comments An assessment has been carried out with respect to National Grid’s electricity and gas transmission apparatus which includes high voltage electricity assets and high-pressure gas pipelines, and also National Grid Gas Distribution’s Intermediate and High-Pressure apparatus. National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area. Appendix 3 |
| 03/12/2018 | Mr I Hosking   |                      | Dear planning officer I have the following objections regarding the Plympton St Mary Plan : Regarding area PLY60(11), This area is currently farming land used for crops. The authority needs to be aware of the need to feed the growing population now and in the future. Use of this land for sports and mixed use will undoubtedly require construction of support buildings which is detrimental to the beauty of the area. It will increase traffic flow in Plymbridge Road Increased traffic flow will increase exhaust pollution. It is open land and adds to the beauty of the local country side and provides enjoyment to those living walking and cycling in the area. It provides an environment for wildlife. Flocks of |</p>
<table>
<thead>
<tr>
<th>Date</th>
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<th>Organisation Details</th>
<th>Comments</th>
<th>Supporting Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>07/12/2018</td>
<td>Plymouth Cycling Campaign</td>
<td></td>
<td>birds can be seen on the land during and after crops have been harvested. This includes deer. Regarding area PLY53: Proposed plans for 400 houses - this is too many houses in a small area. It will no doubt involve the bulldozing of the existing trees, small woodland. This is detrimental to wildlife in loss of habitat and shelter and food source. The destruction of the trees on the border with the golf course will be detrimental to air quality in that less oxygen will be produced and less carbon dioxide absorbed. This contributes to global warming. The number of houses proposed should be limited to 50, More houses will each contribute to more carbon dioxide in the atmosphere from their central heating systems. The more houses then the more cars. More cars increases local air pollution which is already a problem in Plymouth as reported in the national press. More cars will add to the traffic congestion already affecting Plympton from previous unthought through developments. The medical infrastructure is at breaking point with the current population. There is no mention of increased medical or hospital services. More people and housing requires more police resources. We have already seen that police service in the area is in decline and crime is on the increase. This is not sustainable. Ian Hosking</td>
<td>Appendix 3</td>
</tr>
<tr>
<td>12/12/2018</td>
<td>Marcus Salmon</td>
<td>Environment Agency</td>
<td>The Plymouth Cycling Campaign suggests 2 minor changes to wording: Page 18 Policy PSM5: Extra bullet point to be added: “Enhancement of National Cycle Network Route 2 in accordance with Sustrans policy: <a href="https://www.sustrans.org.uk/pathsforeveryone">https://www.sustrans.org.uk/pathsforeveryone</a> ” Page 19 Item T3: Add the words “Cycling and” in front of “pedestrian safety”</td>
<td>Appendix 4</td>
</tr>
<tr>
<td>14/12/2018</td>
<td>Miss Jessica Vaughan</td>
<td>Plymouth City Council</td>
<td></td>
<td>Appendix 5</td>
</tr>
<tr>
<td>14/12/2018</td>
<td>David Stuart</td>
<td>Historic England</td>
<td>Dear Planning Policy Thank you for your Regulation 16 consultation on the Plympton St Mary Neighbourhood Plan. I can confirm that there are no comments we wish to add to those submitted at the Regulation 14 stage. Kind regards David Stuart</td>
<td>Appendix 6</td>
</tr>
<tr>
<td>14/12/2018</td>
<td>Victoria Bankes Price</td>
<td>Woodland Trust</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Access and movement - Places with well-defined and well used routes with spaces and entrances that provide for convenient movement without compromising security.

Structure - Places that are structured so that different uses do not cause conflict.

Surveillance - Places where all publicly accessible spaces are overlooked.

Ownership - Places that promote a sense of ownership, respect, territorial responsibility and community.

Physical protection - Places that include necessary, well-designed security features as laid out in Secured by Design Guidance - Homes 2016, Commercial 2015, Schools & Hospitals.

Activity - Places where the level of human activity is appropriate to the location and creates a reduced risk of crime, fear of crime and a sense of safety at all times.

Management and maintenance - Places that are designed with management and maintenance in mind, to discourage crime and disorder.

The above attributes will also ensure compliance with the following legislation and planning policy requirements:-

Appendix 1: Devon and Cornwall Police

Thank you for requesting informal consultation on the Plympton St Mary Neighbourhood Plan.

My role as the Police Designing out Crime Officer (DOCO) (formerly Police Architectural Liaison Officer – ALO) is to act as the single point of contact for the planning authority, architects and developers, in providing advice and recommendations on designing out opportunity for crime, fear of crime, antisocial behaviour (ASB) and conflict in the built environment. This is achieved by reviewing relevant planning applications (protocol attached), and applying crime prevention through environmental design (CPtED) attributes and Secured by Design principles, in conjunction with the requirements of the National Planning Policy Framework (NPPF) and Local and Neighbourhood Plans.

As Neighbourhood Plans are used in the planning decision process and ‘crime and the fear of crime’ are material planning considerations, therefore a determining factor in planning consent, there should be specific policy created in the Plan relating to such matters and referenced throughout under the relevant subject areas e.g. Health & Wellbeing, Design, Public Realm, Open Spaces, Housing, Environment etc.

The Plan could also mention that future planning applications for new development should be able to demonstrate the CPtED attributes (generally in the Design and Access Statement) and how and where these have been implemented in the design and layout of that development:-
National Planning Policy Framework (NPPF) at paragraph 12 makes a clear statement that sustainable development is at the heart of its planning policy, defining three fundamental dimensions: economic, social and environmental. Crime and the fear of crime, as well as community conflict and acts of antisocial and unacceptable behaviour, can directly impact on all three of these dimensions.

This has been reinforced throughout the NPPF which requires local authorities to produce ‘Local and Neighbourhood plans’ with a specific aim to create:

Safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and

Safe and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas.

Crime and Disorder Act 1998, specifically section 17 which directs that we must have community safety embedded into our planning, our policy and our operational day-to-day activity. It states ‘Without prejudice to any other obligation imposed on it, it shall be the duty of each authority to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can, to prevent, crime, fear of crime and disorder in its area’.

Plymouth and South West Devon Joint Local Plan

Secured by Design (SBD) - SBD is a crime prevention initiative owned by the Mayor’s Office for Policing and Crime (MOPAC) on behalf of the UK police services. SBD aims to reduce crime, the fear of crime and opportunities for antisocial behaviour and conflict within developments by applying the attributes of CPTED in conjunction with appropriate physical security measures.

And any other local planning policies which are relevant in creating safe, secure and sustainable communities and environments

I am pleased to advise that the following policy has been created for the Torquay Neighbourhood Plan, which may assist?
Design to reduce risk and fear of crime

To ensure developments support safe communities, the Plan fully supports the ‘Secured by Design’ initiative by the Police Designing Out Crime Officer’s protocol with Torbay Council.

PLANNING POLICY H2 - Designing out crime

Any new residential development shall be of a design that minimises opportunities for crime, fear of crime and antisocial behaviour proportionate to the scale of the development.

Design to minimise the risk and fear of crime

To ensure the safety and resilience of new commercial, business and public space developments, the Plan fully supports the ‘Secured by Design’ initiative by the Police Designing Out Crime Officer’s protocol with Torbay Council.

PLANNING POLICY J9 - Prevention of crime through design

Any new development of commercial, business or public space shall be of a design that minimises opportunities for crime, fear of crime and antisocial behaviour proportionate to the scale of the development.

I look forward to providing advice and recommendations with regard to future planning applications that sit within my remit of response but in the meantime I hope the content of this consultation response is considered constructive and useful and please do not hesitate to contact me if any clarification is sought or I can assist further.

Thank you

Kind regards
Dear Neighbourhood Planning Team

Planning consultation: Plympton St Mary Neighbourhood Plan – Submission (Reg 16) version

Thank you for your consultation on the above dated 02 November 2018.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

We welcome the progression of the Plympton St Mary Neighbourhood Plan towards Examination. We have one minor comment in the interest of transparency: it should be made clearer in the title of the proposals map on page 13 that it shows allocations from the Joint Local Plan; the allocations shown are not proposed in this Neighbourhood Plan.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Corine Dyke on 02080 268177 or corine.dyke@naturalengland.org.uk. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Corine Dyke
Lead Adviser
Sustainable Development Team – Devon, Cornwall & Isles of Scilly
23 November 2018

Dear Sir / Madam

**Plympton St Mary Neighbourhood Plan Consultation**

**SUBMISSION ON BEHALF OF NATIONAL GRID**

National Grid has appointed Wood to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the above Neighbourhood Plan consultation.

**About National Grid**

National Grid owns and operates the high voltage electricity transmission system in England and Wales and operate the Scottish high voltage transmission system. National Grid also owns and operates the gas transmission system. In the UK, gas leaves the transmission system and enters the distribution networks at high pressure. It is then transported through a number of reducing pressure tiers until it is finally delivered to our customers. National Grid own four of the UK’s gas distribution networks and transport gas to 11 million homes, schools and businesses through 81,000 miles of gas pipelines within North West, East of England, West Midlands and North London.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets.

**Specific Comments**

An assessment has been carried out with respect to National Grid’s electricity and gas transmission apparatus which includes high voltage electricity assets and high-pressure gas pipelines, and also National Grid Gas Distribution’s Intermediate and High-Pressure apparatus.

**National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.**

**Key resources / contacts**

National Grid has provided information in relation to electricity and transmission assets via the following internet link:

Electricity distribution

The electricity distribution operator in Plymouth City Council is Western Power Distribution. Information regarding the transmission and distribution network can be found at: www.energynetworks.org.uk

Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database:

Hannah Lorna Bevins
Consultant Town Planner
n.grid@amecfw.com

Spencer Jefferies
Development Liaison Officer, National Grid
box.landandacquisitions@nationalgrid.com

Wood E&I Solutions UK Ltd
Gables House
Kenilworth Road
Leamington Spa
Warwickshire
CV32 6JX

National Grid House
Warwick Technology Park
Gallows Hill
Warwick
CV34 6DA

I hope the above information is useful. If you require any further information, please do not hesitate to contact me.

Yours faithfully

Hannah Lorna Bevins
Consultant Town Planner

cc. Spencer Jefferies, National Grid
Dear Miss Vaughan

The Environment Agency has recently been consulted by the Local Authority regarding the above development proposal. Please find enclosed a copy of our comments for your information.

This response represents our advice as a statutory consultee on environmental issues associated with the proposed development. The reply should not be confused with the Council’s decision notice, which will be issued by the Local Authority following determination of the application. Please contact the Local Authority if you wish to discuss the final decision to be made on this application.

If you have any queries about the Agency’s response, please don’t hesitate to contact me.

Yours sincerely

Mr MARCUS SALMON
Sustainable Places Planning Specialist

Environment Agency
Manley House Kestrel Way, Sowton Industrial Estate, Exeter, EX2 7LQ.
Customer services line: 03708 506 506
www.gov.uk/environment-agency
Cont/d.
Dear Sir/Madam

Plympton St Mary Neighbourhood Plan – Regulation 16 consultation

Thank you for your consultation in respect of the neighbourhood plan for Plympton St Mary.

We are pleased to see that the summary of the key environmental issues within Plympton St Mary recognises flood risk problems (both from watercourses and surface water run-off) as well as sewerage and water infrastructure issues. To provide context for how these issues have developed the chapter summarising the history of Plympton could briefly include how water has been managed and the watercourses modified through Plympton.

We are supportive of the plan’s vision for the area especially the objective to protect and improve the local environment and green spaces. However, having acknowledged flood risk as a specific concern we consider that flood risk management should also be include it within the vision or objectives. As a minimum it could be incorporated into objective 5 (improve and protect the local environment).

Community action HO1 (utilities provision) is welcomed but we consider it would be useful if the action also included monitoring to show how many developments successfully remove surface water from the combined sewer system. In addition, developer contributions could also be directed towards flood defence infrastructure as well as utilities infrastructure.

The housing section refers to the need for new developments to meet the requirements of the Joint Local Plan (JLP) policy including the need for flood risk to be duly considered. As noted in Appendix II the relevant JLP policy for this matter is DEV37 (Flood risk and water management).
We support policy PSM3 (high quality amenity green space) but consider that the policy or at least its supporting text should be that green infrastructure can have multi-functional benefits including for health and wellbeing, flood risk management, supporting biodiversity, and protecting the water environment. Wherever possible green space provision should seek to maximise these benefits.

Similarly we also support policy PSM9 to resist development on green spaces but consider explicit reference should be included regarding the importance of green space for managing water.

We welcome the inclusion of policy PSM10 (mitigating flood risk) which has been added since the Regulation 14 consultation draft. Nonetheless, in light of the existing acute flood risk management issues in Plympton it would be good if this policy were more ambitious and seek betterment compared to the present day situation. Such betterment should be through surface water management (this is designated as a Critical Drainage Area) and/or by contributing to a flood risk management/improvement strategy. Developers should be directly providing improvements for their own sites or contributing towards improvements elsewhere within the catchment through Section 106 agreements.

The justification for this is that flood risk currently impacts key highway links in and out of this area and emergency services such as fire and police stations in addition to residential dwellings and commercial property. New development is therefore critical to making future improvements and achieving increased resilience for all!

In addition to the requirement for development to be resistant and resilient it is important to note that future users of development must be safe and that some groups of people will be more vulnerable during a flood event than others. It would be useful if the flood risk map also includes the development sites and green spaces.

It is also essential that new development and the landscape are future proofed in order to meet the challenge of climate change.

Yours faithfully

MARCUS SALMON
Sustainable Places Planning Specialist
Dear Mrs Rosemary Hamley,

Thank you for the submission of the Plympton St Mary Neighbourhood Plan (PSMNP) on 15 October 2018. Plymouth City Council (PCC) would like to congratulate the Plympton St Mary Neighbourhood Forum for reaching this stage. Clearly, a significant amount of time and effort, over a number of years, has been put into this plan and the Forum should be commended for its efforts.

As you know, the Council as the Local Planning Authority (LPA) confirmed receipt of the Plan and compliance with the legal requirements on 25 October 2018 and consultation commenced on the Neighbourhood Plan on 2 November 2018. This letter is in response to this consultation and follows on from previous comments made on the draft PSMNP, both formally at the Regulation 14 stage and informally at earlier and later stages.

The Council will ultimately have the responsibility to decide whether the plan is in general conformity with strategic policies and the other basic tests as set out in the National Planning Policy Framework (NPPF) and National Planning Policy Guidance (NPPG). We must also ensure that the plan is compliant with European Legislation. These decisions will be informed by the report of an Independent Examiner following examination. It is therefore necessary that we reserve our judgement until the examiner has produced their report. Nonetheless, without prejudice to the future decision making of the Council, we would like to make the following points and suggestions in relation to the Plan.

**Strategic policies**

The current adopted strategic policies which concern Plympton St Mary are within PCC’s Local Development Framework (LDF) which consists of the following documents:

<table>
<thead>
<tr>
<th>Adopted Development Plan Documents</th>
<th>Adoption Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plymouth’s Core Strategy (including Criteria Based Policies)</td>
<td>04/2007</td>
</tr>
<tr>
<td>Devonport Area Action Plan</td>
<td>08/2007</td>
</tr>
<tr>
<td>Millbay and Stonehouse Area Action Plan</td>
<td>08/2007</td>
</tr>
<tr>
<td>Waste Development Plan Document</td>
<td>04/2008</td>
</tr>
<tr>
<td>Sutton Harbour Area Action Plan</td>
<td>07/2008</td>
</tr>
</tbody>
</table>
For the purposes of the neighbourhood plan however the PSMNP has predominantly referenced emerging policies in the Plymouth and South West Devon Joint Local Plan (JLP) which is currently at examination and, when approved, will replace the LDF in Plymouth.

The Council is supportive of this approach as the JLP is at an advanced stage in its plan making process. PCC welcomes in particular APPENDIX 1 to the Basic Conditions Statement which maps the policies of the PSMNP and their regard to the NPPF (both 2012 and 2018) and both the LDF and JLP, ensuring the PSMNP is as future-proofed as possible.

The Council also welcomes the helpful context/status update featured in the Foreword which recognises that some references to the JLP within the PSMNP may need to be updated soon after the JLP is adopted. The Council is supportive of this approach as it is likely the numbering of policies will change as we wait for the Planning Inspectors final report on the JLP.

**Evidence**
The Council welcomes and encourages the use of the JLP evidence base in the production of the PSMNP and the list of evidence base documents in APPENDIX II of the Plan is a useful summary.

**Suggested changes, reasons and observations**
The PSMNP includes both planning policies and ‘community actions’ which are not designed as planning policies, but which will be used by the community to inform decisions on where to put resources and refocus priorities for the area. For clarity the following observations and suggested amendments have been split into two parts, one to cover planning issues and one to cover the ‘community actions’, which, as lead deliverer for many of the actions, we have some comments/concerns.

**Planning policies**
The below are suggested amendments PCC believes will improve the direction of the PSMNP. Where a specific word change is suggested, the new text is highlighted in green while the text to be deleted is highlighted red with a strikethrough.

<table>
<thead>
<tr>
<th>Policy/page reference</th>
<th>Suggested change</th>
<th>Reason/observation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Page 10 – Environment</td>
<td>Update the first paragraph under Environment to include the new City Green Space designation.</td>
<td>The submitted neighbourhood plan (including the vision diagram) references the old green space hierarchy and should be updated to reference the most up to date hierarchy in the JLP.</td>
</tr>
<tr>
<td>Page 10/24 – Environment/Flooding Issues</td>
<td>Additional reference should be added to the Council’s Local Flood Risk Management Strategy (LFRMS), surcharged sewers, and Critical Drainage Areas (CDA).</td>
<td>The LFRMS contains specific information and objectives for the Plympton St Mary area. Plympton St Mary is in a Critical Drainage Area and there is a significant risk of flooding which may result in...</td>
</tr>
<tr>
<td>Policy/page reference</td>
<td>Suggested change</td>
<td>Reason/observation</td>
</tr>
<tr>
<td>-----------------------</td>
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</tr>
<tr>
<td>Policy PSM5</td>
<td>Amend policy to read: New development proposals should give priority to and improve the attractiveness and safety of walking, cycling and public transport services and infrastructure by, where appropriate:</td>
<td>limitations imposed on surface water drainage for future developments.</td>
</tr>
<tr>
<td></td>
<td>Suggest rephrasing point 4 to: Supporting new railway and supporting infrastructure, if viable. proposals for a new railway if viable.</td>
<td>We are unsure how all new developments will achieve all these points.</td>
</tr>
<tr>
<td>Page 25 - Heritage and the Historic Environment</td>
<td>Amend paragraph under ‘Policies’: The current historical environment of listed buildings, Scheduled Ancient Monuments and-conservation areas can be seen on the vision diagram.</td>
<td>The vision diagram also includes Scheduled Ancient Monuments.</td>
</tr>
<tr>
<td>Policy PSM11</td>
<td>Amend first sentence of policy to read: Proposed new development should will ensure that the historic environment is protected and promoted as a key element of local character and distinctiveness.</td>
<td>Amendment of wording as the current wording is felt to be too prescriptive.</td>
</tr>
<tr>
<td>Policy PSM12</td>
<td>Amend policy to read: Advertisement Applications for signage which raises awareness of highlight local heritage and historical assets will be supported provided that they do not have an adverse effect on visual amenity or public safety.</td>
<td>The policy currently refers primarily to signage but the word ‘Advertisement’ at the beginning of the policy might be misleading.</td>
</tr>
</tbody>
</table>

**Community actions**

As stated in the introduction to the PSMNP, the plan proposal contains a large number of ‘community actions’ which are not designed as planning policies, but which will be used by the community to inform decisions on where to put resources and refocus priorities for the area.

While the Council supports the intention of the Forum to recognise non-planning issues which have arisen during previous consultation, as the Council will be the body which primarily delivers these aspirations, it must be noted and acknowledged within the Neighbourhood Plan that the Council will only ever implement its own policies. Because of this we also specifically ask that community action EC3 is removed from the Plan as this is a matter for the Council to decide in consultation with local businesses and communities.
The below are the suggested amendments which address the Councils above and remaining concerns with regards to the community actions. Where a specific word change is suggested, the new text is highlighted in green while the text to be deleted is highlighted red with a strikethrough.

<table>
<thead>
<tr>
<th>Policy/page reference</th>
<th>Suggested change</th>
<th>Reason/observation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Page 3 - Introduction</td>
<td>Insert additional paragraph after the first paragraph under the map on page 3: ...and refocus priorities for the area. Please note that the community actions within this plan are actions that the local community wish to undertake and do not commit the Council to undertake any actions or change any of its own policies.</td>
<td>The Council believes a statement within the Neighbourhood Plan itself is needed which makes it clear that the ‘community actions’ reflect actions that the local community wish to take and do not commit the Council to taking any actions or change any of its policies when the plan is made.</td>
</tr>
<tr>
<td>Page 19 – Transport and Getting Around</td>
<td>Amend the first paragraph under ‘Community Actions’ to read: However many residents feel isolated as they live beyond the 400m walking distance of a the main bus stop route.</td>
<td>The JLP aspiration is for every residence to be within 400m of a bus stop, not a main bus route.</td>
</tr>
<tr>
<td>Community action T2</td>
<td>Support and help promote schemes which discourage inconsiderate/inappropriate onroad parking, and which restrict parking, especially in residential areas to enable traffic to move more freely.</td>
<td>The Council suggests this amendment to improve the clarity of this community action. We are also concerned that it could conflict with Council policy.</td>
</tr>
<tr>
<td>Community action EC3</td>
<td>Delete community action EC3.</td>
<td>Although it is the Council’s current policy, parking charges in Plympton and elsewhere (and any future changes) are a matter for the Council in consultation with local businesses and communities.</td>
</tr>
</tbody>
</table>

**Closing remarks**

The progress that has been made by the community on this Neighbourhood Plan is impressive and to be commended. We hope that our response is helpful and congratulations once again on reaching this stage in the process.

If you have any questions on the above please do not hesitate to contact the Neighbourhood Planning team at Plymouth City Council on 01752 305477 or planningpolicy@plymouth.gov.uk

Yours Sincerely

Paul Barnard
Service Director for Strategic Planning & Infrastructure
Strategic Planning & Infrastructure
14th December 2018

Re: Consultation on Plympton St Mary Neighbourhood Plan

Woodland Trust response

Thank you very much for consulting the Woodland Trust on your neighbourhood plan for Plympton St Mary, we very much appreciate the opportunity. Neighbourhood planning is an important mechanism for also embedding trees into local communities, as such we are very supportive of some of the policies set out in your plan.

Vision and Objectives

The Woodland Trust is pleased to see that your Neighbourhood Plan identifies the important role that trees play, and that opportunities should be taken to increase tree cover in appropriate locations in Plympton St Mary.

Trees are some of the most important features of your area for local people, and already this is being acknowledged with the Plymouth and South West Joint Local Plan (2017), and how trees are important features which are worthy of protection. Policy DEV24 (Landscape character) identifies trees as being important features that contribute to the character and quality of an area and are worthy of protection, and it seeks to retain as many trees and other natural features as possible. Therefore, this should also be taken into account with either your vision statement or one of the objectives for your Neighbourhood Plan for Plympton St Mary, so that your plan seeks to preserve, protect and enhance your native landscape and mature trees and hedgerows.

Environment

We are pleased to see that your Environment strategy acknowledges the vital contribution of the countryside in Plympton St Mary, and how your plan can assist with safeguarding this from encroachment. But this should also recognise the fact that development should not lead to loss or degradation of trees in your parish.

Ancient woodland would benefit from strengthened protection building on the National Planning Policy Framework (NPPF). On 24th July the Ministry of Housing, Communities and Local Government published the revised NPPF and Paragraph 175 which states:

development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists

The Woodland Trust believe this must be given due weight in the plan making process as it shows a clear direction of travel from central Government to strengthen the protection of irreplaceable ancient woodland and trees. Therefore, we would recommend that Policy PSM9 (Development on green spaces) acknowledges tree protection and provision by including the following:
'There should be no harm to or loss of irreplaceable habitats such as ancient trees and veteran trees'

Also, increasing the amount of trees in Plympton St Mary will provide enhanced green infrastructure for your local communities, and also mitigate against the future loss of trees to disease (eg Ash dieback), with a new generation of trees both in woods and also outside woods in streets, hedgerows and amenity sites.

Information can be found here: http://www.magic.gov.uk/MagicMap.asp and http://www.ancient-tree-hunt.org.uk/discoveries/interactivemap/

The Woodland Trust would suggest that your Neighbourhood Plan is more specific about ancient tree protection. For example, the introduction and background to the consultation on the Kimbolton Neighbourhood Development Plan (2017), identified the importance of ancient woodland, and how it should be protected and enhanced. Also, we would like to see buffering distances set out. For example, for most types of development (i.e. residential), a planted buffer strip of 50m would be preferred to protect the core of the woodland. Standing Advice from Natural England and the Forestry Commission has some useful information: https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences

**Leisure and Wellbeing**

We would like to see the importance of trees and woodland recognised for providing healthy living and recreation also being taken into account with your Neighbourhood Plan for Plympton St Mary. In an era of ever increasing concern about the nation’s physical and mental health, the Woodland Trust strongly believes that trees and woodland can play a key role in delivering improved health & wellbeing at a local level. Whilst, at the same time, the Health & Social Care Act 2012 has passed much of the responsibility for health & wellbeing to upper-tier and unitary local authorities, and this is reinforced by the Care Act 2014. Also, each new house being built in your parish should require a new street tree, and also car parks must have trees within them.

Whilst Policy PSM3 does identify the fact that there are shortfalls in community provision, protecting natural features such as community space provision should also be taken into account, and it should also seek to retain and enhance recreational and local green spaces, resist the loss of open space, whilst also ensuring the provision of some more. Therefore, to what extent there is considered to be enough accessible space in your community also needs to be taken into account with new housing proposals. There are Natural England and Forestry Commission standards which can be used with developers on this:

The Woodland Access Standard aspires:

- That no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size.
- That there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round trip) of people’s homes.

The Woodland Trust also believes that trees and woodlands can deliver a major contribution to resolving a range of water management issues, particularly those resulting from climate change, like flooding and the water quality implications caused by extreme weather events. This is important in the area covered by your Neighbourhood Plan because trees offer opportunities to make positive water use change, whilst also contributing to other objectives, such as biodiversity, timber & green infrastructure - see the Woodland Trust publication Stemming the flow - the role of trees and woods in flood protection - https://www.woodlandtrust.org.uk/publications/2014/05/stemming-the-flow/.

**Woodland Trust Publications**

We would like to take this opportunity to draw your attention to the Woodland Trust’s
neighbourhood planning microsite: https://www.woodlandtrust.org.uk/campaigning/neighbourhood-planning/ which may give you further ideas for your plan.

Also, the Woodland Trust have recently released a planners manual which is a multi-purpose document and is intended for policy planners, such as community groups preparing Neighbourhood Plans. Our guide can be found at: https://www.woodlandtrust.org.uk/mediafile/100820409/planning-for-ancient-woodland-planners-manual-for-ancient-woodland-and-veterandtrees.pdf?cb=8298cbf2eaa34c7da329eee3bd8d48ff

In addition other Woodland Trust research which may assist with taking your Neighbourhood Plan foreword is a policy and practice section on our website, which provides lots of more specific evidence on more specific issues such as air quality, pollution and tree disease: https://www.woodlandtrust.org.uk/publications/

Our evidence base is always expanding through vigorous programme of PhDs and partnership working. So please do check back or get in touch if you have a specific query. You may also be interested in our free community tree packs, schools and community groups can claim up to 420 free trees every planting season: http://www.woodlandtrust.org.uk/plant-trees/community-tree-pack/

If I can be of any assistance please do not hesitate to get in touch, I would be more than happy to discuss this further with you. If you require any further information or would like to discuss specific issues please do not hesitate to contact Victoria Bankes Price – Planning Advisor

Best wishes and good luck with your plan

Ian Lings – Local Planning Support Volunteer

On behalf of the Woodland Trust