Blue and Green Policy Comments2021

Policy no.	Sub-group	Policy title	Policy Objective	Policy description	Aecom flagged further evidence to review	Aecom flagged related policies	Aecom policy comments	Aecom gaps identified	Actions	PCCcomments	Action
BG1	Blue and Green	BG1 Development on green spaces	To protect green spaces from development.	Designated Local Green Spaces (as identified in Aecom Greenspace Assessment) will be protected and only minor development will be supported where: a. it will enhance the value or function of the green or blue space; b. no fundamental change to the character and function of the space would result; c. inclusive access would not be eroded; d. historic features and their setting would not be damaged; e. current primary function of the green space, such as for sports or recreation, would not be lost; and/or f. it would be in keeping with the visual character of the area. g. established public footpaths and rights of way will be protected, including access to the water via steps, paths and slipways; Development proposals on designated green spaces must be accompanied by a comprehensive waste management plan demonstrating howwaste and litter will be managed to prevent any pollution affecting the quality of the environment or its habitats, including preventing waste fromentering the sea.	Plymouth's Green SpaceStrategy 2008 to2023; • Plymouth's Green SpaceStrategy 2008 to2023: Background Report; • Plymouth's Green Infrastructure DeliveryPlan; • Waterfront EvidenceBase Informing thePlymouth Plan; • Plymouth PlayAssessment 2017; • BiodiversityNetwork Creation Process 2017; • Revised Plymouth Greenspace PolicyDevelopment Process; and • Plymouth PolicyAreaTree CanopyCover Assessment	Relevant references in national and local policyincludeNPPF paras. 99 and 100, JLP Policies PLY20, DEV3, DEV4, DEV5, DEV26, DEV27 and DEV28, and Plymouth Plan policies HEA1, HEA7 and GRO6. Notethat theJLP alreadydesignates ArmadaWay, HoeForeshore, Hoe Park, Land off HoeRoad, Land off MadeiraRoad, TheMound (Hoe) and West Hoe Park as CityGreen Spaces and MillbayPark and Radford Road as Neighbourhood Green Spaces.	Thepolicyis broadlysound, except for parts b) and e) which arenot in conformity. Part b) is disproportionatelyrestrictivetochanges in the character and function of green spaces over time, and not in conformitywith Local Plan policy. PolicyDEV27 allows for alternativesports and recreation provision, whereitheneed clearlyoutweighs aloss Part e) partlyduplicates Local Plan policybut is toorestrictive in terms of development management options. Part e) partlyduplicates JLP PolicyDEV3 but alsogoes further. As with part b), it is important that policies are proportionatein allowing flexibilityover theplan period. The current primaryfunction of theLocal Green Spacemaynot always bethebest useover time, and it is necessarytohave regard for thepositivepotential of development which enhances its existing function through upgrade.	TheLocal GreenSpacespolicyshouldideallymakelinksto marineplanning,especiallyconcerning thepublicrealm along TheHoeForeshore. seeThePlymouthGreenInfrastructureDeliveryPlanand WaterfrontEvidenceBase. InthecaseofTheHoeForeshorebluespace,planning responsibilitiesareshared betweenPCCastheterrestrial LPA andtheMMOup tothemeanhighwater mark.TheNPPF describesIntegrated CoastalZoneManagement(ICZM) asa processrequiring theadoptionofajoined-up and participative approachtoplanning andmanagement–HNF should thereforeworkwiththeMMO tocheckhowthispolicy, alongsideother policies,could supportheir broader strategy. Intermsofother gaps,thereisevidenceofdeficienciesof playspace inPlymouth,sothiscould bereferenced inthe policyand itsjustification.Thisdeficiencyisreferredtoin ObjectiveGSS07inPlymouth'sGreenSpaceStrategy2008to 2023.Thepolicycould alsomakealinktoObjectiveGSS20 whichsupportscommunityinvolvementinthedesign, management,enhancementand interpretationofgreen spaces. Theward inwhichPlymouthHoelieshasparticularly lowTree Canopy Cover (5.28%)comparedtoacitywideaverageof 18.5%,withatargetfor 20% canopycover by2034.Therefore, encouragingtreeplanting inLocal GreenSpaceswould be justifiedbytheavailableevidencebase.Netadditional trees and shrubscould offerarangeofbiodiversityand publicrealm benefits.Plymouth'sPlanfor Treeshighlightsthebenefitsof treesand alsonotesthatincreasingtreecoverqualityinareasof thecitywithfewer treesisakeyaspirationfor PCC.	B&G Group tocontact MMO - DaveCurno B&G group toconsider updating policy/ supporting text toaddress gaps re. marine planning, biodiversity, HoeForeshore infrastructure, playspace, and treecover. Seek Technical Support for this work. B&G group toconsider adjusting policywording of parts b and etoallow for changes over time.	ReferencetotheClimateEmergencyand theClimate EmergencyAction Plan somewherein supporting text? Broadlysupportiveof designating LGS, but will need toseethe evidence/justification for theproposed designations and useof Council pro-forma. A lot of this is repeating what is alreadyin JLP policies (DEV28 and DEV26) Whyonlywastemanagement for designated green spaces? Wedon't think this can beinsisted upon but sitewaste management plans are alreadyneeded for all major applications.	Updatesupporting text toreflect ClimateEmergencyAction Plan. Complete: seeAecom Greenspaceaudit and community consultation feedback. Referencethesedocuments in supporting text. QueryJess: how dowehold smaller eg. Café, applications to account for their litter impacts?
BG2	Blue & green	BG2 Trees, hedges and biodiversity	To protect and enhance trees hedges and biodiversity	Newdevelopment affecting trees, hedges, or habitats a) protection of existing trees, hedges, or habitats, or robust justification and mitigation/compensation for any unavoidable loss; b) replacement of end-of-life or diseased trees; c) newtree-planting or hedge or habitat creation that contributes towards net gain in biodiversity, or target growth of total canopy cover to 15%, or delivery of the Hoe ForumAreaTree Planting & Biodiversity Plan TBC or updated Hoe Park Management Plan & CWS Management Statement TBC (appendixX), including adherence to the principle of 'right tree right place'. d) Support for improvement in habitat biodiversity including, mammals, birds, and invertebrates, tidal zone.	Further evidence is also available at Citylevel, including: • JLP SupplementaryPlanning Document (SPD) • BiodiversityNetwork Creation Process 2017 • Plymouth PolicyAreaTree CanopyCover Assessment	PLY20 (Managing and enhancing Plymouth's waterfront)	This policy on trees, hedges and biodiversity is currently rather limited in scopeand does not currently makesufficient links tothe existing broader evidencebaseand policy context. It would also benefit from more neighbourhood level evidenceon hedges and biodiversity which would ensurethat it is tailored tolocal circumstances. Thereis agood opportunity presented by the preparation of TheHoeForum AreaTreePlanting and Biodiversity Plan which should beabletofill theseevidencegaps and add extradetail tothepolicy. JLP Policy DEV26 seeks theprotection, conservation, enhancement and restoration of biodiversity across thePlan Area and seeks net gains in biodiversity from all major development proposals and enhances for wildlifein thebuilt environment from all scales of development. Neighbourhood Plans can add valueto Local Plan evidenceby identifying and mapping additional sites of importancefor local biodiversity – including trees, hedges and other habitats. In moredetail, part a) should alsorefer tothebiodiversity network and thePlymouth Sound & Estuaries European siterather than solely habitats. If local habitats areidentified and mapped it may requirefurther rewording. For part b) theuseof 'or' is not typically theway in which planning policy is written. It is logically unclear why adevelopment should for examplebeexempt from achieving anet gain in biodiversity by virtueof only increasing canopy cover. It is much easier toenforceapolicy if therequirements areclear and consistent. Part b) should berephrased toremove'or' and replacethis with 'and' becausetheproposed phrasing creates much uncertainty about how thepolicy will beapplied in development management decisions. Thereis robust evidenceto requireanet gain in biodiversity and contribution toincreases in treecanopy increasefrom all development affecting trees, hedges or habitats.	Thereisavailableevidenceforthispolicyfor ittoincludemore detailonthetypeand rangeoftreeswithreferencetothe DesignGuide,whichwill beamaterial considerationin planningdecisionsoncetheNeighbourhood Planhasbeen adopted.Thereisrobustevidencethatcertaintreespecies maybeneeded incertainlocationstoensurethatthey enhancethebuiltforminthebestwaypossible.Itis understoodthatTheHoeForum AreaTreePlanting & BiodiversityPlanhasnotyetbeenprepared,this couldseek tobuildonmoreofttherecommendationsfromthe DesignGuideevidencebaseinthispolicy. Thepolicyreferstohedgesbutthereisnoavailable evidenceontheconverageandqualityofhedgerowsin TheHoe. Thisisagap intheevidencethatwould help complementthepolicyobjectives.Possibleimprovements wouldbetoadd recommendationsonthespecies,heightand widthofhedgesand provideexamplesofthekind ofhedges whicharecharacteristicofthearea.TheSPDprovidessome guidanceonhedgerowsonpage149 whichmaybe relevant. Asitstands,thepolicyisnotcurrentlyworded inawaywhich relatesstronglytotheJLPpolicyand itsevidencebaseon biodiversity.Thepolicyreferstohabitats,butdoesnot refertothebiodiversitynetwork,whichisanimportant element,especiallyasTheHoeParkisdesignatedasa coresite.Refer to PlymouthSoundandEstuariesSAC, whichisaEuropeansiteofinternationalimportance protectedbytheConservationofHabitatsandSpecies Regulations2017andtheConservationofOffshore MarineHabitatsandSpeciesRegulations2017.NPPF para.174a) requiresthatplansidentify,map and safeguard local wildlife-richhabitatsand wider ecological networks, including thehierarchyofinternational,national and locally designatedsitesofimportancefor biodiversity,wildlife corridorsand steppingstonesthatconnectthem.HNF should thereforeconsidermappinglocalwildlife-richsitesto supplementtheexistingevidencebase andensurethatthe NDPmeetsitsNPPF requirements.	B&G group tocommission further evidence gathering and moreambitious wording as reccomended byAecom. HK / PT tocontact Localitytoseeif this is availablethrough Technical support? Further technical work toaddress gaps re. marine planning, biodiversity, HoeForeshore infrastructure, playspace, and treecover.	Becareful of managing expectations, trees areparticularly damaging toroads when planted tooclose. When theHoeAreaTreePlanting and BiodiversityPlan is being written, as theHoeis an urban area werecommend you liaisewith our Street Services and Green Estate's team to ensurethedeliverabilityof theplan. It's hard for us tobe supporting of documents which don't exist yet, their content mayyet changewhat is written in your plan. As previously stated, I don't think it's good practicefor your policies torefer tospecific documents, particularlythosewhich don't exist yet. It would bebetter for you tolook at theSPD which sets out the requirements for replanting, which werecommend is utilised in A lot of this is repeating what is alreadyin JLP policies (DEV28 and DEV26)	Seek Aecom Technical Support for preparation of further evidencebasetosupport moreambitious and specific policy re. trees and biodiversity. Techincal support maybeneeded tofacilitatecloser collaboration betweenHoeNP and PCC Natural Infrastructure todesign mutuallybeneficial policy-wording.

Culture, Economy and Tourism Policy Comments2021

Policy no.	Sub-group	Policy title	Policy Objective	Policy description	Aecom flagged further evidence to review	Aecom flagged related policies	Aecom policy comments	Aecom gaps identified	Sub-group Actions	PCCcomments	Sub-group Actions
CET1	Culture, Economy and Tourism	CET1 Overnight Accomodation		High quality visitor overnight accommodation and/or conference accommodation proposals will be supported provided: a) the scale of the proposal is appropriate to the context and meets the requirements of policy H1 in respect of heritage and design; b) the proposal does not adversely impact the market for locally-owned independent hospitality providers; c) the proposal capitalises on opportunities to deliver market diversity and only-here experiences; d) the proposal will be regulated, operated and managed in accordance with industry best practice.	Evidencepresented in supporting text: •Culture, Economy& Tourism Sub-group discussions; •Plymouth Visitor Plan; •National MarinePark designation; •Plymouth Growth Board's Inclusive Growth Charter; •AECOM Housing Needs Assessment; •Colliers International data; •HNF Business Survey(TBC); •HNF Hoteliers Survey(TBC); •Consultation responses; and •JLP PolicyPLY21. Further evidence is also available at Citylevel, including: •Plymouth Hotel Market Study	JLP PolicyPLY21 & DEV20. The Plymouth Plan PolicyINT1 and Policy INT3.	Thepolicyis well supported bytheevidencein thePlymouth Visitor Plan 2020 – 2030. Theevidencesuggests that new hotels should meet world-class qualityand alsoinclude independent hotels toensurethat accommodation has character. This supports b), c) and d) of thepolicy. Plymouth has ahotel market which can support adiverse rangeof accommodation, evidenced byoneof thehighest occupancylevels in anyEnglish city. TheHoeis situated to takeadvantageof theUK's first National MarinePark which will contributetoPlymouth's worldwiderecognition. Thepolicy is broadlysupported bytheavailableevidence; however, if HNF wishes toadd further detail tothepolicy, somefurther evidence mayberequired, as explained below. The overnight accommodation policyhas good evidence and c) is well worded. However, a) appears torestateexisting Local Plan policyand b) and d) togobeyond therequirements of aland useplan, with b) likelytobreach theBasic Conditions becauseit discriminates against certain sections of the market. C) should beretained but new text could beadded to makethepolicycould bemorespecific totheneeds of The Hoeareabyidentifying thetypes of overnight accommodation needed, which would havetheadded benefit of making the requirements of b) and d) morelikelytobemet in anycase. Thesupporting text and policywould benefit from evidenceof theneeds of local hoteliers and business owners which could besampled through abusiness survey. Claused) could form a communityproject rather than apolicy, e.g. avoluntarycodeof conduct or an accreditation scheme.	Addmoredetailspecifictothe Hoeareaasmuch of theevidenceusedisinreferenceto Plymouthasa whole. Identifying the specific types of overnight accommodationneeded inTheHoe, for example, wouldimprovetheeffectivenessof thepolicyand make it morelikelyto attractthekindof accommodation appropriatetotheareawithout discriminatingagainst certainpartsof the market. Additionalevidencecould bederivedfrom businessand visitor surveysin the local area.	CET group toconsider additional visitor and business surveys toprovidedataspecific tothe Hoe. Can Visit Plymouth help with this? CET group toinvestigateadditional evidencefor impact of chain hotels and AirBnB. Air DNA data? Cornwall Livearticle? CET group toupdatepolicywording todelete points a), b) and d). CET group toconsider voluntarycodeof conduct for all accomodation providers, and consult PHA, Amanda Lumleyetc	PLY21shouldbethestartingpoint for thispolicy.Alsoit'sreally important that you'reclearonwhat youaretryingtoachieve.Thispolicy ascurrently wordedistrying tocontrol somethingwhichisn't necessarilyaplanning considerationandcouldbeinconflict withadoptedpoliciesintheJLP. We thinkthispolicyshouldbe re-writtentobe morepositively worded. Rather than restrictingdevelopments,it shouldbe more about what youwant tosupport i.e. amix/rangeof providers. Include aclear objectiveto support independentprovidersrather thansaying what wouldn'tbeacceptable. Restrictingcompetitionisnot theroleof theplanningsystem, whilst developmentalongthelinesproposedin PLY28andPLY27could havean impacton locally-ownedindependenthospitalityproviders that doesn'tnecessarilymeanthoseproposalsshouldn'thappen. You wouldneedclear evidencetobackupsucha policywhichwe'renot currentlyawareof. (pointc) - "only-here"experiencesshouldbe defined, andagainneeds tobemorepositivelyworded. i.e. wewillsupportproposalsthat… rather than sayingwewillonlysupportproposalsthat… (pointd)–would thisrequirehotelmanagement plansfor assessment?Whilst wecancontrolthingslikedeliveries, opening hoursetc.wecan't controleverysaspect of the business.Thisisn't a planningconsiderationorsomethingwecouldenforceandit maybe worth lookingat other legislation.	Ask Jess tosuggest alternativewording. Ask Jess tosuggest alternativewording. Deletepoint b) per Aecom/PCC comments. CET group todefine'onlyhere' referencing Visitor Plan defnintion if appropriate. CET group toconsider voluntarycodeof conduct for all accomodation providers, and consult PHA, AmandaLumley etc
CET2	Culture, Economy and Tourism	CET2 Locally-led, Green & IndependentTourism Development		Newand extended high-quality tourismfacilities, attractions, events and activities will be supported where they are for tourismthat supports inclusive growth, capitalises on local assets, (i.e. The Hoe's landscape, biodiversity, marine environment, and heritage), encourages cycling, walking and use of public transport, and that: a)support the provision of locally-led unique-to-Plymouth 'only-here' tourismexperiences; b)support the conservation of, and education about the local environment; c)support the local supply chain by sourcing produce, materials, and labour or other operational sub-contractslocally; d)are physically accessible and socially inclusive, facilitating use by all the local community as well as tourists; e)achieve small-scale improvements to sustainability, for example by recycling waste, and using renewableenergy; or, f)protect and enhance the setting of The Hoe and its natural and historic environment.'	Evidencepresented in supporting text: •Culture, Economy& Tourism Sub-group discussions; •Plymouth Visitor Plan; •National MarinePark designation; •Plymouth Growth Board's Inclusive Growth Charter; •AECOM Housing Needs Assessment; •Colliers International data; •HNF Business Survey(TBC); •HNF Hoteliers Survey(TBC); •Consultation responses; and •JLP PolicyPLY21.	Relevant local and national policy references includeJLP Policies SPT2, SPT9, SPT10, SPT12, SPT14, PLY6, PLY20, PLY21, PLY37, DEV31 and DEV32 and Plymouth Plan policies INT1 and INT3.	Thepolicyisnot currentlyaseffective asothersbecauseit iswritten moreasa set of communityaspirationsor intentionsrather than a spatialplanningpolicy. For example, itreferenceseventsand activities,whicharelargelyoutsideof the scopeof planningpolicy, rather needingtime-limited permitsfrom theCouncil. Secondly, it includescertainprovisionswhich, whileunderstandable,areeither not strictlyrelevantto planningapplications, or not inconformitywith relevantlaw and planning policy. Someof theaimsof thispolicymay bebestrestatedasacommunityproject.However,if thepolicyis wordedinawaysuchthat it reflectsmoreof a spatialapproachparts it couldbeeffectiveandwouldbesupportedbyLocalPlanpolicyand thePlymouthVisitor Plan. Thekeyissuewiththispolicyasit standsisthat muchof it covers areasthat arenot relevanttoor abletoberegulatedbyalanduse plan- clauseas), b),c) aremoresuitableascommunityaspirations or projects,and eventsandactivitiesarenormallyconsentedthrough time-limited Councilpermits rather than planningpolicies, though shapingfacilitiesandattractionsiswithinthe scopeof the policy. Policiesmust bespatialinnature andimplementable through developmentmanagement decisionsontheuseof land. Inaddition, requirementsthat facilities or attractionsbe locally-ledor make contractualagreementsinthelocalareaonlyareoverlyrestrictive and notenforceable,theyalso runcontrarytorelevant areasof law. Whileclausesd),e) andf) areallappropriate, e)mayrestateexisting LocalPlanpolicy, though it couldpotentiallybe redraftedto encouragesustainabilitymeasuresin awaythat addstoexisting policy;if so, thephrase'small-scale'shouldbe removedasit is artificiallyconstraining.	Theevidencefor theintroductorypartofthepolicyand parts a),b),d),e) andf) isgenerallyproportionatewithsomeminor exceptions,including theevidencefor 'locally-led' experiences Itisimportantto firstdeterminethemeaning oflocally-led-for example,doesthismeanabusinessinlocal ownershipor simplyanactivitywithcommunityinvolvement?Inneither case would therequirementbeenforceableor inlinewiththerelevant competitionandtradinglaw.Itmaybebetter toclarifythat locally-ledmeanstheencouragementand/or engagementof thecommunityineventsor other tourismexperiences supportedbythePlymouthPlan,particularlyPolicyHEA5.To add specificity,itwould beworthidentifying thefacilitiesand attractionscurrentlylackingintheareaand using thisas evidencetoencouragethesparticular developmentstocome forward. Partc) isnotsupportedbyevidenceandisinanycasenot relevanttoland useplanning.Inorder tomeetthebasic conditions,policiesmustbespatialinnature.Arequirementto contractproduce,materials,labour or otheroperational sub-contractslocallywouldalsoruncontrarytorelevantbusiness, competition,contract,employmentandtradinglaw.TheUKis effectivelya'singlemarket' for goodsand serviceswithoutany barriersfor abusinesstohireand contractwithinthe jurisdiction. Thispartofthepolicycanthereforebesafely deleted.	CET toimprovesupporting text with references flagged byAecom - look up HEA5, and Inclusive Growth Strategy. CET group toidentifywhat is currentlylacking in thearea- Patrick Knight? CET group toconsider whether this policycould betranslated intoaparallel 'Local Economic Strategy' (seeSt Ives), applied toall businesses topromotelocal / independent ownership of the supplychain. Cross ref. toClimateEmergency and Keep it Local campaigns, creating opportunities for local businesses tothrive. Can Aecom support thepreparation of aLocal Economic Strategy?	Missing reasoned justification for this policy. It would begood tounderstand abit moreabout what this policyis trying toachieve/control. A lot of events for example won't requireplanning permission, which doesn't makeit reasonable, enforceable or relevant toplanning.	Ask Jess about parallel Local Economic Strategytocover the aspirations of this policy?
CET3	Culture, Economy and Tourism	CET3 West Hoe Shopping Parade		Proposals for newretail or local service facilities at West Hoe Road shopping parade will be supported. ~~Proposals that result in the loss of local shopping facilities at West Hoe Road shopping parade will be required to robustly demonstrate that viable alternative retail uses cannot be found. Change of Use of ground floor retail to residential will not be supported.~~			Policynot reviewedbyAecom	Policynot reviewedbyAecom		Missing reasoned justification for this policy. Thesecond lineis not in linewith theGovernment changes on class E and permitted development toC3 and sounfortunately will not beimplementable. Therewill belimited need for planning permission and thereforelimited control. It would be worth thinking what elseyou could dotoretain theseuses and its unlikelynow that this policyis appropriate.	CET group toconsider whether this policycould betranslated intoaparallel 'Local Economic Strategy' ?

Heritage Policy Comments2021

Policy no.	Sub-group	Policy title	Policy Objective	Policywording	Aecom flagged further evidence to review	Aecom flagged related policies	Aecom policy comments	Aecom gaps identified	Sub-group Actions	PCCcomments	Sub-group Actions
H1	Heritage	H1 Good Quality Design	To promote good design	All new development within The Hoe area must demonstrategood qualitydesign. This means responding toand integrating with local surroundings and landscapecontext as well as theexisting built environment. In summary, in TheHoeareagood design means: a) achieving high qualitydesign that respects the scaleand character of existing and surrounding buildings and views; b) respecting established rooflines and heights, generally3-5 storeys; c) respecting established building lines and arrangements of front gardens, walls, railings or boundaries; d) ensuring proposals relatetoestablished plot widths within streets wheredevelopment is proposed, particularlywheretheyestablish arhythm tothe architecturein astreet; e) using good qualitymaterials that complement the existing paletteof materials used within TheHoe; f) conserving and enhancing existing heritage features and materials, including surfaces such as cobbles; g) adopting theprinciples of sustainableurban drainage; h) meeting therequirements of 'SecurebyDesign' to minimisethelikelihood and fear of crime; and i) innovation toachievelow carbon sustainable design.	Further evidence is available at the Citylevel, including: •Barbican Conservation Area Appraisal; •JLP HeritageImpact Assessment; and •Plymouth Waterfront Strategic Masterplan.	Evidence presented in supporting text comprises: •The Hoe Conservation Area Appraisal; •Local List (TBC); •JLP Policies DEV10, DEV20 and DEV21; and •Plymouth HoeDesign Guide (AECOM);	This design policyis proportionate to the evidence and recommendations of theDesign Guide. Thepolicyshould, however, makereferenceto the Design Guideas an appendix to the NeighbourhoodPlan sothat applicants can refer toits more detailed guidance on specific areas. The policyis proportionate to the Design Guide evidence and it is consideredtherearenogaps. Both the JLP and the Plymouth Plan, are verylight-touch on design and make specific requirements in asite-specific way. This indicates that this policyis justified as it fills agapat local policylevel and does not repeat existing requirements The policyis within the scope of Neighbourhood Plan policies on design and largelyreflects a similar wordingto thecase studypolicywhich Locality recommends in its toolkit on good design in neighbourhood planning. The policyadds to the JLP requirements (seein particular policyDEV20) and is in conformitywith the Local Plan. The policyis effective and proportionate to the evidence but shouldreferencetheDesign Guideand make cross-reference to other policies where possible. It adds value to the Local Plan which contains littleor nopolicycovering design specific to the neighbourhood plan area, so there is a clear need for this policy. It is consistent with national andlocal design policy.	Thepolicyis effectivebut should makereference to The Hoe Design Guide and could also link to therequirements of other policies such as H3, H4, H5, H6 and PT1, PT2 and PT3. It might also behelpful toincludesomemaps from the Design Guidein the plan toset out theimportant aspects of the local built form.	Update policytext to cross reference to other policies and the Design Guide.	DEV20shouldbethestartingthepoint forthispolicy. Mostofthepointsofthis policyarequiterestrictiveand/oralreadycoveredelsewhereinJLP policy. -(introductorypara)Wedisagreewith thiswordingastherearebuilt and landscapefeatureswhichhaveanegativeimpact oftheHoe'stownscapequality (asidentified in theCAAMP, forexample)andit isnot desirabletointegratewith those. It'salsoabout recognisingthat somesitesareinstrategiclocationswhere thereisaparticularopportunityforinnovativedesign solutions,perhapsevena taller building. -(point a):Again,weouldquestionthisform ofwords- therearebuilt and landscapefeatureswhichhaveanegativeimpact oftheHoe'stownscapequality whichit isnot desirabletorespect. Withregardstorespectingviews, thewording should bemorepreciseand definewhichviewsarereferred to(doyou haveamapforexample?I thinkthe CAAMPshowskeyviewpoints). Thereareofcourseimportant strategicpublic viewstoandfromtheHoe,however, someexistingviewswill beaffectedby developmentofallocatedJLP sitesbut thispolicyshouldn't compromisethe delivery. Beawarethat lossofprivateviewsarenot amaterial planningconsideration. (point b): It'sverylikelythat wewouldlooktoobject tothepolicyprescribing specificbuildingheights. Wehad thisdebateatttheJLP inquiryandtheJLP inspectorsdidnot uphold therequest toset specificbuilding heights.Thereare allocatedJLP sitesintheareawhereheightsofover5storeyswould bejustified. Thewording, asurrent,could compromisethedeliveryofthesesites. Wecould agreethat buildingheightsshould respect theHoe'sspecialcharacterand the scaleofthebuildings,streetsand spacesthat makeapositivecontributiontoits townscape,but cannot support setting prescriptivestoreyheights. Building floor-to-ceilingheightsvary, includinginrelationtodifferent usetypesand mixesof usesanditisimportant thatthepolicyallowsflexibility. Could thepolicyinstead recognisethisand includewordingalongthelinesof'Buildingheightsshould respectttheHoe'sspecial characterandthescaleofthebuildings, streetsand spacesthatmakeapositivecontribution toits townscape. Theremaybean opportunityforaccentedbuildingheights and/or tallbuildingstomarkkey gatewaysiteswith highqualityinnovativearchitecture." Supportingtext could includereferencetotheJLP andtheseexceptions. (point c): Aswithcommentson (point a)above, thereareinstanceswhere, for example,existingbuilding lineshaveanegativeimpact onthequalityoftheHoe townscape(thePlymouth MarineLaboratory(PML)site, forexample)andit wouldnotbedesirabletorespect these, sowewould suggestthiswording be reconsidered. (pointe)–Thiscouldrestrictinnovativeuseofalternativequalitymaterialsand conflictwithNPPFintermsofpara127"c)aresympathetictolocalcharacter and history, including thesurrounding built environmentandlandscapesetting, whilenot preventingordiscouraging appropriateinnovation orchange(such as increased densities)". (point f-i)- Believearealreadycoveredintheu JLP. (pointi)– It would beinteresting toknowwhat you'rethinkingwhenyou're referringto"lowcarbon sustainabledesign"?	Ask Jess to comment on Aecom's comments - they think the policy is sound. Heritage Group / HNF to identify and produce definitive map of 'buildings of negative quality'. This may require a workshop and / or support from Historic England / Aecom. Use maps and photos to identify key views in supporting text. Query: how to align H1 with PLY27 and PLY28? May need Aecom support on this.
H2	Heritage	H2 Heritage Assets	To protect heritage assets including those on the new local list.	Development affecting designated and non-designated heritageassets (including thoseon thelocal list – appendixX) within TheHoemust payspecial regard to theneed toconserveand enhancetheir settings and anyspecial architectural or historic features of significance.		Policynot reviewedbyAecom	Policynot reviewed byAecom			Missing reasonedjustification for this policy. We question whether this policyneeded. This is alreadycovered bythe NPPF and JLP PolicyDEV21. The local list (onceapproved) will be covered by NDHAs. On theLocal Listing recommendations we wouldquestion the view taken for someas to what might constitutea featurefor local listing (e.g. byrecommending modern information plaques etc.). A lot of thesewould not make it through the filters for classifyingNDHAs given in the SPD and we would recommend that the proposed list is reviewed with referenceto this.	Heritage Group to discuss local list proposals with Jess to progress its adoption by PCC.
H3	Heritage	H3 Monuments &their Interpretation	To preserve monuments and ensure consultation in respect of any changes.	Anyproposal that affects existing monuments, statues or other markers of historical or social significance, or proposes new ones, should seek toadopt theprinciple of 'retain and explain'in theinterests of reflecting historical complexitywhilst protecting heritageassets. Proposals tochangeor introduceinterpretation of monuments, statues or other markers of historical or social significancemust demonstrateand reflect public consultation on an appropriatescaleand with appropriatestakeholders in linewith thesignificanceof themonument.	Further evidence is available at the Citylevel, including: •Barbican Conservation Area Appraisal; •JLP HeritageImpact Assessment; and •Plymouth Waterfront Strategic Masterplan.	Evidence presented in supporting text comprises: •The Hoe Conservation Area Appraisal; •Local List (TBC); •JLP Policies DEV10, DEV20 and DEV21; and •Plymouth HoeDesign Guide (AECOM);	Thepolicyisrelevant toTheHoebecauseofits largeclusterofhistoric monumentsandstatuesand reflectsup todatenationalguidance. It isbasedon goodevidence,andisproportionateandtimely, covering afast-changingpolicycontext thatlocal policyhasnot yet hadtimeto adapt to. Thepolicyisconsidered likelytobeeffective. It is clearlywrittenand shouldbestraightforwardfordevelopment managerstointerpret and apply. Thepolicyfollowsnational guidanceand addstotheJLP which doesnot containguidanceonstatuesand monumentsmorebroadly and onlyspecificallymakesreferencetoScheduledMonumentsand listedbuildings. Itaddstowithout working againstnationalandlocal policy.	n/a		Missing reasonedjustification for this policy, but alsoquestion if this policyis needed as the government has recentlyannounced changes to permitted development right regulations to ensure demolition is subject to planningdecisions New freedoms to support high streets and fast track deliveryof schools andhospitals across England introducedtoday- GOV.UK (www.gov.uk) How wouldthesignificant of the monument bedetermined? What extent of 'public consultation' and how wouldit beundertaken?	Ask Jess to comment on Aecom's comments - they think the policy is sound. Penny has concerns about a 'retain at all costs' stance. Can the wording allow for statues to be moved to The Box if that is the public mood?
				Buildings which havebeen identified in theHoe Conservation AreaManagement Plan / this plan TBC as being of negativequalitymust, when re-developed, be replaced with high qualitybuildings which makea positivecontribution tothespecial interest of thearea, designed with regard topolicyH1.	Further evidence is available at the Citylevel, including: •Barbican Conservation Area Appraisal; •JLP HeritageImpact Assessment; and	Evidence presented in supporting text comprises: •The Hoe Conservation Area Appraisal; •Local List (TBC); •JLP Policies DEV10, DEV20 and DEV21; and	TheHoeConservationAreaAppraisalneedstobesupplemented with alist ofadditionalbuildingsexhibiting thenegativecharacteristics outsideitsboundary, becauseTheHoeConservationAreadoesnot coveralloftheNeighbourhood Plan area,but theassessment will havetobeconsistent withtheConservation AreaAppraisal. Anylist shouldreferencetheConservationAreaAppraisals,Local PlanpoliciesandDesign Guiderecommendations. It willalsorequire specialistandobjectiveinput fromaheritageconsultant toassess	Thepolicyisproportionatesubjecttothequalityofthe evidencefordesignatingbuildingsashavingnegative qualitiesinaddition tothoseidentifiedbyTheHoe ConservationAreaAppraisal. A list should beprepared withreferencetotheConservationAreaAppraisals, Local PlanpoliciesandDesign Guide recommendations,andthiswill needtobeclearly referencedinthepolicy,possiblyincluding amap, so	Heritage Group / HNF to identify and produce definitive map of 'buildings of negative quality'. This may require a workshop and / or support from Historic England / Aecom.	Missing reasonedjustification for this policy. Development in CAs is alreadycovered bythe NPPF and DEV21. The policywording and analysis in the AECOM Plymouth Hoe Design Guide(2018) seems to suggest theplan is to appraisethe areaoutside of the HoeCA toidentifybuildings of 'negative-quality'. We'd needto check this list with HE officers. Wewouldquestion, for example, the	Heritage Group / HNF to identify and produce definitive map of 'buildings of negative quality'. This may require a workshop and / or support from Historic England / Aecom.

HousingPolicy Comments2021

Policy no.	Sub-group	Policy title	Policy Objective	Policywording	Aecom flagged further evidence to review	Aecom flagged related policies	Aecom policy comments	Aecom gaps identified	Sub-group Actions	PCCcomments	Sub-group Actions
HS1	Housing	HS1 Housing Mix and Accessibility	To promote a balanced neighbourhood and inclusive acces	New housing development should address housing needs in theForum area, particularlyin terms of affordability, size, and thelifetimeneeds of residents. Affordablehomes should beincluded at least in line with theadopted targets of theJoint Local Plan, and theseshould besplit between social rental (65%), and affordableownership (35%) as defined byPCC. Formal arrangements should bemadetoensurethat thehomes remain affordablein perpetuity Developments of 5 dwellings or moreshould includea balanceof dwelling sizes, including 3+ bedroom homes suitablefor families. Proposals for theconversion of flats back tofamily homes will besupported. All new developments should meet thestandards for “Accessibleand AdaptableDwellings” in theBuilding Regulations Part M2, in order tomeet thelifetimeneeds of residents.	Further evidence is available at the Citylevel, including: •Local List (TBC); •JLP SPD guidancepages 38 to 53; •Plymouth and South West Devon Strategic Housing Market Assessment (SHMA) Part 1; •PCC – TheHousingNeeds of Physically Disabled People in Plymouth; and •JLP – Market Signals update. •Plymouth and South West Devon SHMA Part 2;	Evidence presented in supporting text: •The Hoe Housing Needs Assessment (HNA), AECOM; and •Colliers International data	The housing policydoes not exceed the Local Plan requirement but does add detail in accordancewith the HNA tenureand affordabilityevidence. However, it does not currentlyfullyreflect the detailedguidance inthe HNA. Firstly, the policyshould reflect thetenuremixrecommendations more accurately.The HNA proposed a tenure mixof 33%home ownership products,of which 18% first homes, 10%shared ownership and5%rent to buy. Theother67% of affordable homes should be foraffordable or social rent,to be setby registered providers.Secondly, the policyshould mention that if the Government’s 25%First Homes requirement comes forward, ofthe 33% home ownership,25%would be first homes and 8%shared ownership products. It is important to signpostthis forthcoming change innational housing policyand keep thepolicyas up to date as possible. The policywould also benefit byreflecting theevidence more accurately in terms of the detailed breakdown of affordable tenures provided bythe HNA. The guidance on the size of homes is currentlynot as strong as it could be given thescale of needformore3 and 4 bedroom homes in The Hoearea. The policyis broadlyeffective but does require some minorupdates. Firstly, the reference to onlysocial rental needs to be revisedbecause the recommendation is for both affordable and social rentalas 67% ofthe affordable tenure mix.Where the policystates ‘as definedbyPCC’ this is confusing because PCCpolicies do not define the mixof affordable tenures but writtenas such it mayappearto implythis. This section of the policy should be revisedto set outthe tenure mixin the HNA, both before and after the Government’s proposed 25%First Homes requirement. The following text and table area suggested replacement: -see Aecom table, p72. Thereis evidence forrequiring developments tomeet the Building Regulations Part M2standards, as encouraged in footnote 46of the NPPF, whereas identified need exists.The HNA determinedthat The Hoe has a higher-than-average proportion ofelderlypeople than Plymouth as a whole. The proportionof residents aged75 and abovewill rise from 10.9%in 2011 to 16.3%by2034. This is higherthan average growthcompared to Plymouth. Of those households aged75 and above,32% are limited a lot intheirday-to-dayactivities and a further29%are limited a little intheirday-to-dayactivities, as recorded byCensus data. need for24 to 39 households requiring specialist accommodation bythe end of the plan period. Theevidence onthe ageing population of Plymouth addsweight to a need forimproved accessibilityforthe elderlyfromnew developments,particularlyin reference to specialistaccommodation thatmaycome forward to meet elderlyneeds. The policyis in conformitywith national policyand JLP Policies SPT3, DEV7, DEV9, DEV10 and Plymouth Plan policies HEA8 and GRO3.	Thepolicywouldalso benefit byreflecting the evidencemoreaccuratelyin terms of the detailed breakdown of affordable tenures provided bythe HNA, and the First Homes requirement.		Assimilartopastcomments, wewouldprefer thatthispolicyismorepositively-wordedandbuildsoffwhat isalreadywithintheJLP,and/ormakeit clearerifthis isproposedtobeusedinsteadofthehousingpolicieisn theJLP. For example…“InadditiontopolicyXX oftheJLP thefollowing aspirationsare sought subject toviability….”And thenlistwhat you’resupportiveof. i.e. family housing, convertingflatsbacktolargerdwellingsetc. etc. Ourmaincomment hereisthat youneedtobuild someflexibilityintothepolicy. At themomentit’sveryyesornoand it’simperativethatpoliciessuchasthese haveflexibilityandallowfornegotiation. We’vesuggestedsomewordingtohelp withthisasastarter for10 tohelp strikeabalancebetweenyouraspirationsand ourneedforsomeflexibilityandmaintainingageneralconformitywiththeJLP. Para2- Ourpreferenceisthat thesefigures(65/35)aren’tenshrinedinpolicyas definite.AsaCouncilweneedtheflexibilitytobeabletonegotiate. Alsoyou may want tothinkabout First Homes?ItisnowGovernment policyandwewillneed toconsider thisifdeveloperssput it forward. Para3– Thispointistoorestrictiveaswordedandlikelytocauseissuesfor viabilityaswell asthedeliveryofPLY27and PLY28. Itwouldbehelpfulto includereferencetoaphrasesuchas“wherefeasibleandviable”. Alsoisit suggestingthateach developmentof5ofmoredwellingsneedsat least 13+ bedroom home? Para5–WhenyousayM2,areyoumeaningM4(2)? Thisisdifferent toJLP policyDEV9 which saysat least20% of5 ormoredwellingsshould meet nationalstandardsfor M4(2). Howeveryoucould usephrasessuchas“aspireto exceedJLP targets”. Doubtfulthat ALL newdevelopments wouldbeableto provide100% M4(2)whichiswhat thispolicyisstating.	
HS2	Housing	HS2 Housing Site PLY27	To set out a plan for the Register Office site	Land at Lockyer Street, TheHoe, is allocated for mixed usedevelopment, including affordablehousing in the order of X no. homes, and communityspace. Development should providefor thefollowing: a) High qualityarchitecturethat is informed by Neighbourhood Plan policyH1, and adetailed heritage character assessment; and that conserves and enhances thecharacter or appearanceof theHoe Conservation Areaand Registered Park and Garden. b) Provision of amenityspacethat fosters social interaction. c) High qualitypublic realm including thepotential enhancement of amenityspaceon adjacent Armada Way. d) Communityinvolvement in linewith Neighbourhood Plan policies HS3. e) Provision for parking, cycling and walking that responds toNeighbourhood Plan policies PT1-3. f) Appraisal of thepotential tocontinueor relocate theregister officefunction within theForum area.	Furtherevidence is available atthe City level, including: •JLP SPD guidance pages38 to 53; •The Hoe Conservation Area Appraisal•The Hoe Design Guide, AECOM; •Plymouth Waterfront Strategic Masterplan; and The conclusions ofthe feasibilitystudyare important in considering theproportionality of the policyand the outstanding evidence required. The RegisterOffice feasibilitystudy gives HNFsome robust possibleactions, one of whichis seeking a changeto JLP PolicyPLY27 from the Council Planning Committee which would then bereferred to the Secretaryof State forjudgement. To AECOM as independent assessors, the chances of this happening seem remote; there is little precedentforit in neighbourhood plan terms. This does not change the fact thatwe agree with HNFthat this site is of theutmost sensitivityand importance forthe conservation of TheHoe’s heritage and landscape,as demonstrated by the Design Guide, Conservation Area Appraisal and Management Plan and FeasibilityStudy. However, seeking a change of LocalPlan Policymayrequire a veryhigh threshold of evidence and will have to be considered in a sensitivewayin discussions with PCCto win theirhearts and minds for policyevolution ratherthan revolution.	Evidencepresented insupporting text: •TheHoeHousingNeedsAssessment (HNA), AECOM •HNFchallengetopolicyPLY27 at JLP consultation stage; and •JLP and SPD.	The policyshould seek to applyadditional requirements to the site ratherthan restate anyLocal Plan requirements. Some statements should be removed to avoid repeatingPolicyPLY27, as set outabove. Part a)could elaborate furtheron how thedesign principlesof PolicyH1 would applyto the siteand should also referto the Design Guide. It could also reflect the requirements of PolicyH6 on balconies and roofterraces. Parte)could reflect the wording of PolicyPT1 on sustainablemobilitymore fullyand could also raise the The policyis not in conformitywith the basic conditionsbecause elements restate Local Plan policyand not all ofthe requirements areappropriate in terms of conformitywith the local plan. However, with some editing this site-specific policycan be in conformityand add additionalrequirements to the Local Plan PolicyPLY27. The policyadds to ratherthan restating national policy. It is valuableto have a NeighbourhoodPlan policyspecific to this site,but it should not restate some Local Plan requirements and conflict with others-as worded, the policywould fail the Basic Conditions and be deleted. It is acknowledged that itwill be hardto get the exact wording right and will need detailed and sensitive engagementwith PCCbefore it evolvein the right direction. However,HNFshould be realistic and accept thatsome degree of compromise is likelyinevitable. The policycould link betterto the heritage and transport policies and make more detailed site-specific provisions. HNF’s FeasibilityStudyforthe site which proposes seeking a change to the Local Plan policy. We recommend that this course of actionis avoided due to its low potential forsuccess and high risk of damaging therelationship with PCC necessaryforthem to supportHS2.	Adjust policywording and seek dialogue with PCC		As with otherpolicies we encourage a more positiveapproach here. I.e. state that what you’re proposing through yourneighbourhood plan is an alternativeapproach based on your analysis and engagement with local people. To unpick a local plan policy/allocation will be difficult to achieveand you’ll need a high levelof compelling evidence and justification to support thisapproach. Thisshould be partof yourevidence base and referenced inyourneighbourhood plan. Manyof the keyelements in the adopted PLY27 are notincluded in your proposedpolicy for the site, but it is importantthat theyareand, where possible, the existing wording in the policyof the JLP is used. These elementsinclude: 1.Optimising the site’s redevelopment potential. 2.Making themost of the site’s strategic role, marking the Hoe’s gatewayto Armada Way. 3.Active ground floorfrontages to enlivenall public streets and spaces, including Armada Wayand Citadel Road. 4.Improved east-west public access along the site’s north boundary, linking Armada Way to Lockyer Street 5.Innovativecarparking, reducing visual impact of vehicles on the public realm. Re. point (1)– this doesn’t need tomean a tower, it could beon a moremodest scale, but that aspect of context is a reallyimportant one; and it maybe that the ArmadaWay frontage (orpart of it)does need some extraheight. (2)- Yourpolicycould referenceother potentiallyacceptable uses, forexample, restaurant/café/gallery/communityuse/small scale retail to supportvisitoreconomy. The keybeing that we do want activeground flooruses, particularlyon the frontagefacing Armada Wayas this is a keycorridorbetween the Hoe and CityCentre. Flexibilitywill be important fordelivery/ viabilityand, although we know you arenot in agreement withus on this point, we consider that the hotel use should beretained as partof the potential mixas well as the importantactive ground flooruses. f. Is this a reality? We think this aspiration should be relegated tothe narrative. Otherwise how does an applicant implement this point of the policy? An alternative would be toinclude it in the first sentence as oneof the potential otheruses in the mix. In addition to the above,please also considerfeedback on 28/04/2020 re. housing numbers, Inote that at themoment your policyisn’t specifying a number.	

Pedestrian and Transport Policy Comments2021

Policy no.	Sub-group	Policy title	Policy Objective	Policy description	Aecom flagged further evidence to review	Aecom flagged related policies	Aecom policy comments	Aecom gaps identified	Sub-group Actions	PCCcomments	Sub-group Actions
PT1	Pedestrians & Transport	PT1 Promoting sustainable mobility	To promote more sustainable transport and mobility	Newdevelopment should be designed to reduce the likelihood of travel by car and support a more sustainable local transport network. It should: a. Prioritise walking, cycling, and public transport as the most favoured modes of transport; b. Take all available and reasonable steps to reduce the use of cars, to provide electric vehicle and e-bike charging points, and/or car-share schemes. Development which would increase the likelihood of travel by car will not be supported unless it is demonstrated that this can be managed effectively through a green travel plan. Proposals for the introduction of on-street / curbside public electric vehicle charging points or mobility hubs in suitable locations will be supported, provided that they are sited appropriately and will not impede pedestrian or cyclist safety. Proposals for newcycle paths that improve cycle connectivity will be supported, provided that they are well-designed and safe.	Further evidenceis availableat City level, including: •JLP Policies SPT1, SPT2, SPT9, PLY6, PLY20, PLY37 and DEV29; •SPD pages 164 to169; •JLP – BaselineTransport Conditions Report; •JLP – Transport Infrastructure Statement; and •Plymouth HoeDesign Code (AECOM).	JLP Policies SPT1, SPT2, SPT9, PLY6, PLY20, PLY37 and DEV29; SPD pages 164 to169;	Thepolicyis broadlyeffective, and its requirements are proportionate to the level of available evidence. The main current issueis that thepolicydoes not directlytieits requirements tobroader national and local priorities totackle climatechange. PCC's ClimateEmergencywould alsobe worth referring toin thepolicy. Both thesechanges would increasepolicyeffectiveness.	There isunderlyingnationalevidenceandsupport for planningpoliciesfocusedonsustainability, andclimate change mitigation.UKlaw isalsoencouraging offar-reaching actionstoreducelower carbonemissions. There isubstantiallocal evidencefor sustainable mobilityneedsingeneralandthat TheHoe inparticular ismoresuitablefor developmentwhichaimsto reduce car use. Thispolicyisanopportunityfor theNeighbourhood Planto arguethat theimportanceof promoting walking and cyclingin TheHoeareawouldrequireall development proposals to include atravel plan except inexceptionalcases.However, it maybe worth discussingwithPCC whetherthey would consider this proportionate. Whilethesupporting textreferstothe climate emergencyandclimatechange, itwouldbeadvisable for thepolicytomakeadirectlinkbetween theneed for sustainablemobilityandreducingcarbonemissions. Thisrelatesthe policytoscientificevidenceandalso tiesitbetter tonationaland localpriorities, showing how the Neighbourhood Planseeksto supportthem.	P&T group toreview additional evidenceflagged byAecom and updatepolicy/ supporting text to reflect climateemergencyand carbon reduction aims, and toemphasiseevidencethat supports theHoeas asitefor development with reduced car use. SeeAecom link toCentrefor SustainableEnergy. P&T group torequest dialoguewith PCC SustainableTransport Officers towork on policy collaboratively. Techincal support maybeneeded tofacilitate closer collaboration between HoeNP and PCC Officers todesign mutuallybeneficial policy-wording.	Refer toHoeas avisitor destination in supporting text. Clearly wesupport thenotion of reducing theneed totravel bycar but don't think its entirelyrealistic in this context of avisitor destination. There's acareful balancetobestruck. Refer tocoaches, cyclepaths, walking trails in suporting text. Referenceand evidence needed for reference to exploration of Madeira/HoeRoad trial traffic closures, and impact on accessibilitytobeconsidered. This is oneof thepolicies which would causeofficers quitea lot of issues and confusion. If thereis atransport policyit should beamplifying and building off policies SPT9. SPT10 and DEV29 - not promoting thesamethings but in adifferent form of words. Understand JLP policythen add specific detail. Under theprovision of theNPPF wecan onlyrefuse development if it leads toasevereimpact in terms of highway capacityor safetyissues. Somedevelopments might not meet thethreshold in respect of requiring aTravel Plan but yet would still result in an increasein traffic movements. Is thecyclepaths sentencereferring todeveloper led schemes or all infrastructureschemes? If thelatter, therearedesign standards which must bemet soroutes arewell-designed and safeand hencethis statement isn't needed.	Updatesupporting text. Updatesupporting text. Contact CityBus toinform public transport section. Referenceis given in text. P&T group torequest Jess's help tocollaboratewith PCC on revised policywording. Querywith Jess: howdoweaddress this?
PT2	Pedestrians & Transport	PT2 Parking	To manage demand for parking spaces on the Hoe area.	Development proposals should provide sufficient parking to meet and manage demand, whilst supporting the transition towards a lowcarbon/emissions transport futurein accordancewith policy PT1.	Evidencepresented in supporting text: •Communityconsultation responses Further evidenceis availableat the Citylevel, including: •SPD pages 153 to163; •JLP policyDEV29; and •Plymouth HoeDesign Guide (AECOM).	Further evidenceis availableat the Citylevel, including: •SPD pages 153 to163; •JLP policyDEV29; and •Plymouth HoeDesign Guide (AECOM). It maybevaluabletohave apolicyconsidering thedesign of parking in new developments in the Neighbourhood Plan. ThePlymouth HoeDesign Guide(seepage68) makes several design recommendations about car parking	Thispolicydoesnot currentlyaddvalue to theNeighbourhoodPlan asitisquitegeneral, isnot locallyspecificanddoesnot reference theexistingevidencebaseoncar parking.Itisalsonot clear if the policyisconsistent withother NeighbourhoodPlanpoliciesasthey arecurrentlywritten. Supportingatransitiontowardsalow carbon and low emissionsfuture mayrequireare-estimationof the needfor parking overtheplanperiod. PolicyPT1arguablyencourages developmentproposalsto minimisethe useofcarsandthispolicy maythusworkat cross-purposes. TheSPD setsout specificparking provisionstandardsfor residential developments;however,therecan beexceptions. TheSPD also encouragescar-freedevelopment incertain areasof thePlanArea and thatthiswouldbeconsideredonacase-by-casebasis. This policycurrentlyimpliesthat alldevelopmentsshouldprovidesome level of parking when car-free development is allowed byPolicy DEV29andthesupportingSPD provisions(seepage155of the SPD). TheHoewouldlikelybe oneof themost suitableplacesin Plymouthfor car-freedevelopment givenitshostof amenitiesand proximitytotheCityCentre. Aparkingpolicycouldandshould therefore reflectthebenefitsof car-freedevelopment inencouraging sustainabletransportand meetingtherequirementsof NeighbourhoodPlanPolicyPT1. TheSPD alsorequires developmentstoprovidecycle parkingandelectricvehiclecharging pointsandthismaybe worthsignposting. There isproportionateevidencetosupport aNeighbourhood Plan parking policy. However,in ordertomeet theBasicConditions,the policyshould not reiterate therequirementsof LocalPlanPolicy DEV29. Thispolicydoesnot currentlyaddvalue to theNeighbourhoodPlan asitisquitegeneral, isnot locallyspecificanddoesnot reference theexistingevidencebaseoncar parking. It isrecommended thatit bedeletedandreplacedwith analternativeparkingpolicy.	Notreflectingtherecommendationsofthe DesignGuideon parkingdesignappearsagap inthispolicy.Toensure consistencywithPT1,itwould beworthexploring how a parking policycanhelp achievesustainablemobility. Car parking canhaveaconsiderablenegativeimpacton the qualityofthepublicrealm and land availablefor greenspaces, hedgesandtreesinaconfined urbanareasuchasTheHoe. Cross-referencingheritagepoliciesmayalsobejustified,as car parking canhaveahighvisual impactonthestreetscenes ofhistoricareasand alsoproveanobtrusiveaspectofnew developmentwhereporlydesigned. Therefore,PT2should better supportand cross-referencetoother Neighbourhood Planpolicies.	P&T group toconsider alternativepolicythat is morecloselyaligned with PT1, and cross-referenced toHeritagepolicies (heritageimpacts of unsightlyparking). P&T group toask PCC if parking need audit has been prepared for purposes of planning permits or visitor parking. This evidencemaysupport alternativepolicywording.	How is this policydifferent toDEV29.3 other than an alternativewayof wording it? Parking should beprovided in accordancewith thestandards as outlined in theadopted SPD. Car-Freedevelopment can be acceptablein this areaand this should bereflected in the Neighbourhood Plan. Thereis thepotential for developments tobeapproved with noparking given permit parking zones. This statement conflicts with PT1 and developmentreducing thelikelihood of travelling bycar. In fact believePT1 and PT2 arein conflict and would beconfusing for adeveloper and officer toassess an application.	P&T group torequest Jess's help tocollaboratewith PCC on revised policywording informed byPCC parking evidence/ pipeline. Techincal support maybeneeded tofacilitatecloser collaboration between HoeNP and PCC Parking todesign mutuallybeneficial policy-wording.
				Proposals that improve the accessibility of The Hoe area for all sectors of society including the elderly and disabled will be supported. Wherepossible, newdevelopment should contribute towards improving the condition, lighting, and accessibility of adjacent paths and pavements, and to improving road safety.	Evidencepresented in supporting text: •Communityconsultation responses.	Further evidenceis availableat the Citylevel, including: •TheHoeHousing Needs Assessment (HNA), AECOM;	Theevidenceisproportionatetothepolicy, althoughthepolicy should refer totheevidencesothat it isclearer whyaccessibility, particularlyforthedisabled andtheelderly,issoimportantfor The Hoe area. Thepolicyiseffectiveandwell-worded, therequirementsare reasonableandreflectthenedsidentifiedbyTheHoe DesignGuide and PlymouthWaterfront StrategicMasterplan. Thepolicyshould howeversignpostttheseevidencebasedocumentsbecausetheymay wellenhancethedeliveryof suchaccessibilitypolicy.	Thepolicydoesnot referenceevidencecurrently. However,thereappearstoberobustevidencefrom boththeHNA, DesignGuide, PCC documenton housingneedsof thephysicallydisabled, theSHMA and PlymouthWaterfront Strategic Masterplan. Add thetext 'Needs of themost vulnerabletobe considered first' tothesupporting text.	P&T group toupdatepolicytoreflect evidence identified byAecom.	Thinkthe"wherepossible"lineprobably makesthisOKbut weare concernedabout aspirationsandmanaging expectations.Forexample wouldthismeet thetestsof reasonablenesstoexpectnewdevelopmentto improvetheconditionof pathsandpavementsandlighting?Wouldlikely needtobedirectly relatedtoproposeddevelopment. Encourageengagement with PADAN regarding inclusive accessibility?	P&T group toupdatepolicytoreflect evidenceidentified by Aecom. P&T group tocontact PADAN

PT3	PT3 Accessibility					•Plymouth HoeDesign Guide (AECOM); •TheHousing Needs of Physically Disabled Peoplein Plymouth, PCC71; •Plymouth and South West Devon SHMA Part 272; •JLP SPD pages 87 to97. •Plymouth Waterfront Strategic Masterplan73; and					

						(AECOM);	minimiseanyperceptionofbiasorsubjectivityasthiscanbean emotivetopicarea. Thepolicyisproportionatesubjectto thequalityoftheevidence. Additionalevidence,possiblyincludingamap, willneedtobeclearly referencedinthepolicysothat itisabsolutelyclearwhichbuildings thepolicyrefersto. Thepolicyshouldstate'iftheyareredeveloped'(not 'when')asthereis noguaranteeverysuch assessedbuilding willcomeforwardfor	refersto, otherwisethereisariskthat it couldbeapplied tothebuildingsit isnot designedtocoverand miss thoseit is.		linkedtothepolicy, andwhythis is not identifiedas beingof negative quality. However, with rewording, and if a crediblelist of 'opportunities for improvement' or suchlikecan bemutuallyagreed upon with the LPA, the policycould, in principle, bebeneficial. Also, manyof the buildings maynot be redeveloped, so again need to manage expectations.	
H5	Heritage	H5 Heritage &energy efficiency retrofit	To support energy efficiencies measures in heritage buildings	Thesensitiveretrofitting of energyefficiencymeasures such as thermallyefficient glazing, insulation, solar panels, heat pumps or other technologies in historic buildings will besupported, provided that thehistoric characteristics of heritageassets aresafeguarded.	Further evidence is available at the Citylevel, including: •Barbican Conservation Area Appraisal; •JLP HeritageImpact Assessment; and •Plymouth Waterfront Strategic Masterplan.	Evidence presented in supporting text comprises: •The Hoe Conservation Area Appraisal; •Local List (TBC); •JLP Policies DEV10, DEV20 and DEV21; and •Plymouth HoeDesign Guide (AECOM);	It isensibletoencourageenergyefficiencymeasureswhilst ensuring that retrofittingofhistoricbuildingsisdonesensitively. TheHoe Design Guidesetsoutthat theredevelopment orrestorationof buildingsofarchitecturalmeritshould ensuretheyretaintheirstrong senseofplace. Thepolicyisproportionatetotheevidencefromthe Design Guideand addsdetailtotheLocalPlanheritageandenergyretrofit policies. GivenTheHoe'snotablearrayofheritageassets, andtheincreasing likelihoodofenergyefficiencyretrofitsover theplanperiod,it is justifiabletohaveapolicyonthisissueforthegeographicalarea. Thepolicyisclearlyandeffectivelyworded-nochangesare recommended. It conformswithrelevant nationalandlocalplanning guidance	n/a		Theintention is good, but planning is complicatedin this area, especiallyas planning permission is not requiredfor lots of these interventions in domestic, unlistedbuildings (NDHAs), but obviouslyin aListedBuildingit can bequitecomplicated. The words "historic characteristics" would needto bechangedto makeit clear that it is not just about the visual appearance.	Ask Jess to advise how to adjust policy. Heritage group to seek guidance from Historic England - has their position changed in the ligth of Climate Emergency?
H6	Heritage	H6 Balconies and roof gardens	overlooking.	Development proposals which includebalconies and roof gardens / terraceareas will ~~only~~ besupported if they: - donot haveadetrimental impact on theroofscape of theimmediateor surrounding area; - donot havea negativeimpact on theamenity of neighbouring residents byvirtueof overlooking; and - donot causeunacceptableharm toheritageassets or their setting.	Further evidence is available at the Citylevel, including: •Barbican Conservation Area Appraisal; •JLP HeritageImpact Assessment; and	Evidence presented in supporting text comprises: •The Hoe Conservation Area Appraisal; •Local List (TBC); •JLP Policies DEV10, DEV20 and DEV21; and •Plymouth HoeDesign Guide	Thepolicylargelyreflectstheguidanceset out in theJLP SPD on page240.TheHoeislikelytoexperiencemoreapplicationsfor balconies,roofgardensandotherdecking, terracesand patiosthan otherpartsofPlymouthItisthereforevaluabletousethisSPD guidanceintheNeighbourhood Plan, asit willtaketried andtested text fromLocal Planlevelthat doesnot yet havepolicystatusand convertit intoapolicy. However,it isworth notingthat someofthistypeofdevelopment may fallunderpermitteddevelopment rights. Thiscouldeasilyberemedied simplybyaddingthewords'that requireplanningpermission' afterthe words'roofgardens/terraceareas'. Thepolicyisinconformitywith localpolicyand nationalpolicy	n/a	Update policywording to add the words 'that require planning permission' after the words 'roof gardens/terrace areas'	If therealreadyis overlookingandthe balcony does not significantly add tothis, then it's hardto resist. Becauseof this the wording maybe too strict and it shouldberewordedsoit is more positive. Wedon't think this point is necessaryas it's alreadycoveredbythe NPPF and DEV21.	Ask Jess to propose alternative wording. Strikethrough only
H7	Heritage	H7 Retail and commercial frontages	To preserve the heritage features of West Hoe shopping parade.	Development proposals for new shopfronts, signage and/or lighting tocommercial premises should demonstratehigh qualitydesign and preserveor enhancethecharacter of theshopping frontageand, whererelevant, theConservation Areawithin which they arelocated. In TheHoeareagood shop front design means: materials, with theuseof plastic signagebeing strongly resisted. Cross ref. toSPD and ads guidance. And whereappropriate, its restoration. Definewhat wemean c) Theretention of existing or provision of new pilasters and cornicing whererelevant/appropriate. d) If external lighting of ashopfront or commercial premises is proposed, this should involvelights complying with thehighest standards in thelatest relevant British Standard for energyefficiency. Lighting should seek tohighlight thecharacter of theproperty and enhancethelocal setting. e) Theclear displayof thepropertyaddress number in keeping with thecharacter of thestreet toaid the emergencyservices, deliverydrivers and others visiting properties. f) Thesensitiveincorporation of securitymeasures other than external shutters. Check SPD g) Level access toshop entrances. Where achievable. h) Thereshould benosignageor other decorativeor promotional features placed on thepublic pavement. Check SPD for A-boards maybecovered bylicensing			Policynot reviewedbyAecom	Policynot reviewedbyAecom		This policyrequires review toconsider what can becontrolledthrough the planning system and what measures are alreadyin place to require someof the outcomes sought – e.g. through the DDA, Building Regulations etc. For example, we don't believe points d, e, f or h are planningconsiderations and soshould not be within the policy. Level access (point g) is also not always achievable and point c wouldn't be appropriate on a modern shop front. A-boards on the pavement etc is often covered bystreet services.	Ask Jess to advise how to adjust policy.