The Hoe Neighbourhood Forum

Feedback Received from Regulation 14 Consultation

30 January 2025

update following 27/1/25 meeting



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Revisions for 29 January version:

- Code added to each comment for tracking purposes
- Some comments re-categorised from organisations to individuals
- One missing email respondent added
- Statistics and charts adjusted for updated counts
- Chart legends made more consistent

Introduction

This report compiles the responses received during the Regulation 14 consultation on the Hoe Neighbourhood Plan (HNP) into a single document for use by the Hoe Neighbourhood Forum and the HNP working groups. The formal public consultation on the Plan ran for an eight-week period from 18 November 2024 to 13 January 2025. The responses came to us through:

- The online commenting system set up for the consultation on the Forum's website (www.hoeforum.org.uk)
- Paper forms that were available at the various public sessions that the Forum ran during the Reg 14 Consultation period
- Emails from individuals who chose to comment that way instead of through the online system
- Emails from organisations that were invited to review the plan and make comments (over 60 organisations were contacted, 14 replied)

This report is intended to help the Forum and the HNP working groups review all the comments received and determine whether and how to change the draft Hoe Neighbourhood Plan before submission to Plymouth City Council for inspection.

Overview of Consultation Responses

This overview provides a summary of the feedback received from organisations and individuals. This is a high-level view; details of the comments received are presented in the next part of this report against the section or policy they relate to. Comments have not been edited – except to remove extra line breaks and spaces – the misspellings, wrong words, typos, etc., are as they were entered into the online system or sent by email (though the ones typed from the paper forms may have typos).

Comments from Organisations

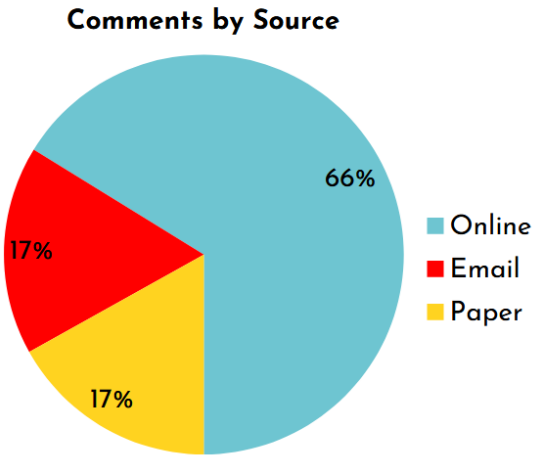
- Over 60 organisations were invited to comment (see list in Appendix 12 of the Consultation Statement)
- 14 organisations responded (see below)
- Many statutory consultees had no comments
- Only one was substantially negative… Plymouth City Council

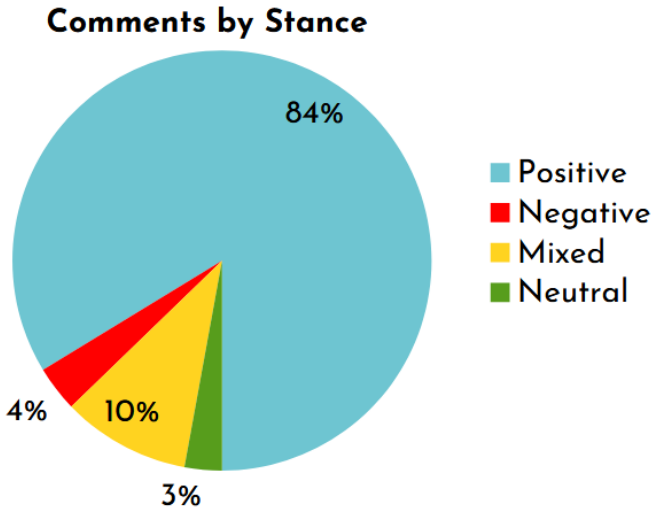
Climate Action Plymouth	**Positive**
Commonwealth War Graves Commission	**Neutral**
Defence Infrastructure Organisation	**Neutral**
Environment Agency SPDC	**Mixed**
Environment Plymouth	**Mixed**
Historic England	**Positive**
National Grid	**Neutral**
National Highways	**Neutral**
Natural England	**Neutral**
Old Plymouth Society	**Neutral**
Plymouth Architectural Trust	**Positive**
Plymouth City Council	**Negative**
Plymouth Civic Society	**Mixed**
Plymouth Waterfront Partnership	**Positive**

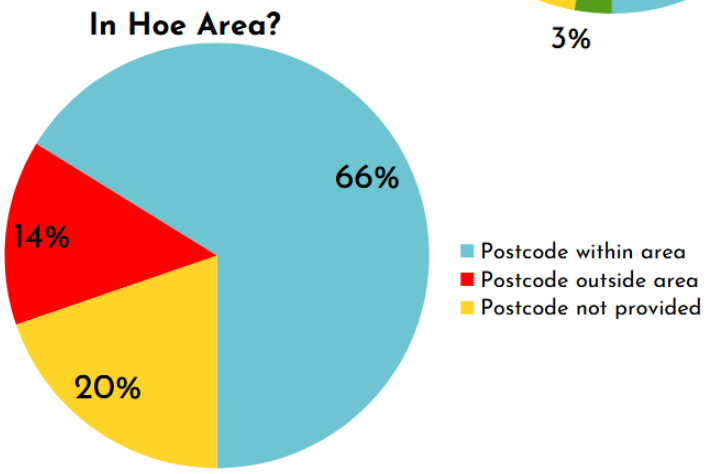
Comments from the Public

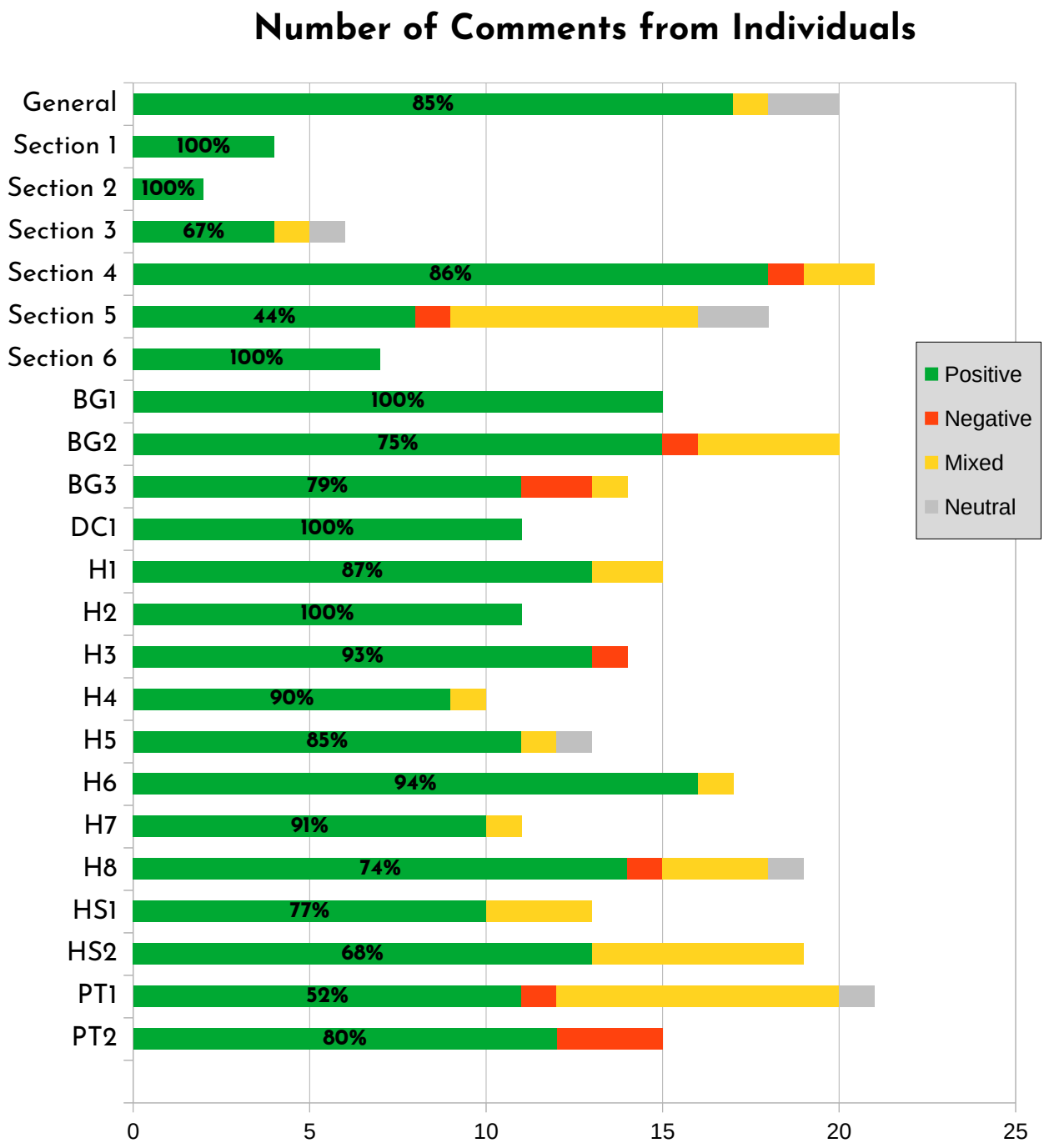
The table below summarises the number of comments received from individuals during the Hoe Neighbourhood Plan Reg 14 consultation.

313	Number of comments
71	Number of individuals who commented
4.4	Average comments per individual
37	55% commented on only one part or on the plan as a whole
13	18% commented on 2-5 parts
12	18% commented on 6-10 parts
9	10% commented on 11 or more parts









The balance of this report provides the details of the responses received.

Feedback on Overall Plan

Comments from Organisations

Number of responses: 14

Code	Organisation	Stance	Comments
G-CAP	Climate Action Plymouth (David Bricknell)	Positive	Thanks for a copy of the Hoe Neighbourhood Plan. A very well put together and comprehensive document and you and the authors are to be commended. *See also comments relevant to policies H6 and PT1*
G-CWGC	Commonwealth War Graves Commission (Steve Stewart, South West Regional Manager)	Neutral	Our Estates Team Head of Property has looked over your consultation document and has made the following comments. He cannot see anything that would have a direct or negative impact on the memorial, and if the neighbourhood plan is enacted as you hope then it should ensure that all areas within close proximity to the memorial are afforded even more local protection. *See also comments relevant to policies H3 and H4*
G-DIO	Defence Infrastructure Organisation (Matthew Ellis, Senior Town Planner)	Neutral	*See comments relevant to policy H4*
G-EA	Environment Agency SPDC (Harriet Fuller, Sustainable Places Planning Advisor)	Positive	Thank you for your consultation of 18th November 2024 providing us with the opportunity to comment on the pre-submission version of the Hoe Neighbourhood Plan. We support the plan's overarching vision and objectives, particularly, the recognition of the potential impacts of the Climate and Nature Emergencies. *See also comments relevant to Section 5 and policies BG1, HS1 and HS2*
G-EP	Environment Plymouth (Jackie Young, Coordinator)	Mixed	*See comments relevant to specific policies*
G-HE	Historic England (Alan Thompson, Historic Places Adviser)	Positive	*See comments relevant to Section 5 and policies H3, H4, H5, HS1 and HS2*

G-NG	National Grid (Ben Thomas)	None	NGED has no comments to make in relation to the plan.
G-NH	National Highways (Sally Parish, Highways Development Management, South West Operations)	Neutral	Thank you for consulting National Highways on the pre-submission version of the Hoe Neighbourhood Plan. National Highways is responsible for operating, maintaining and improving the strategic road network (SRN), which in this case comprises the A38 trunk road running approximately 3km to the north of the Plan area. Following our review of the pre-submission draft we are satisfied that the proposed policies within the Plan are unlikely to result in development which will adversely impact the SRN and we therefore have no specific comments to make on the document. This does not however prejudice any future responses National Highways may make on site specific applications as they come forward through the planning process, and which will be considered by us on their merits under the prevailing policy at the time. *See also comments relevant to policy PT1*
G-NE	Natural England (Sally Wintle, Officer)	Neutral	Natural England does not have any specific comments on this draft neighbourhood plan. *See attached letter for NE's general advice for neighbourhood plans*
G-OPS	Old Plymouth Society	Neutral	No Comment
G-PAT	Plymouth Architectural Trust (Win Scutt, Chair)	Positive	*See comments relevant to policy HS2*

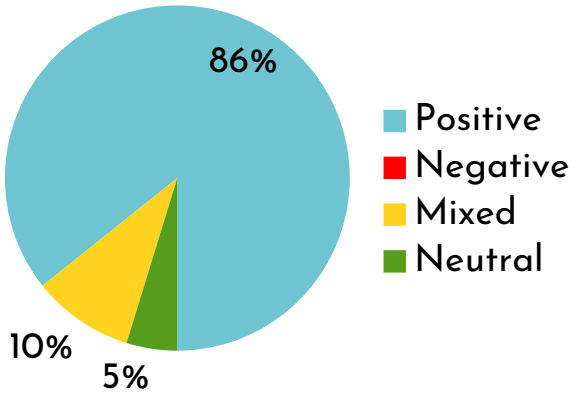
G-PCC	Plymouth City Council Planning Department (Paul Barnard)	Negative	It is our opinion that the Draft Hoe Neighbourhood Plan as currently written fails to meet these basic conditions and contains policy wording which at present are not drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. Therefore it is not in general conformity with the strategic polices of the adopted Plymouth and South West Devon Joint Local Plan. Given these fundamental concerns we recommend that the suggested changes to the document are made before the Hoe Neighbourhood Forum formally submit the Neighbourhood Plan to the City Council. *See also comments relevant to other sections and policies*
G-PCS	Plymouth Civic Society (Garry Gerrish, Richard Sroka)	Positive	Following my review of the 141 Page Hoe Neighbourhood Plan at the Library and Richard's review of the eversion we conclude that the document is a sound and comprehensive document which PCS supports. *See also comments relevant to Section 5 and policies H4 and PT1*

G-PWP	Plymouth Waterfront Partnership (Jon Walton, PCC)	Positive	On behalf of the board and advisory panel: We think this is a wonderful, detailed and ambitious plan that will provide a truly collaborative vision and implementation for this beautiful area. The main pillars of conservation, community and sustainability resonate with our own business plan which aims to deliver a prosperous Hoe and waterfront for businesses and residents alike. We particularly like the design code which will help businesses in our area really deliver quality in such an iconic location. The focus on heritage to influence this is again something we truly believe in. All places across the UK have a unique heritage which is something that makes them unique, something online cannot offer. Together with this we want to make Plymouth, and the Hoe a place people want to come to and not have to-ie to simply transact. Our event program is of course designed to attract footfall but it is nothing without a pleasant environment where many stakeholders come together to deliver excellence and passion for their city. We truly believe that this plan is a step-change for the Hoe and we are 100% supportive. The Hoe is truly unique with the best vista in the UK, this will protect it for future generations to enjoy. *See also comments relevant to policies H1, H2 and H3*

Comments from the Public

Number of comments: 21

Note:
The online comment system should have had a "General" or "Overall Plan" option. I think many people would have preferred to comment on the plan as a whole rather than on individual policies. Most of the comments below came through on the paper forms or email rather than through the online system.



Code	Stance	Comment
G-1	Positive	I very much support the consultation document, especially the strong focus on providing a sustainable and balanced mix of housing that serves all sections of the community. The Hoe must be reflective of the community and the city it sits within and provide a real sense of purpose, place and therefore pride for its residents and visitors alike I believe the consultation provides a strong framework for that to be taken forward and would commend all related parties to note the strong evidence base and work that the Hoe forum has provided and this wider consultation with local residents and businesses as indicative of a strong community voice on these matters Many thanks to all those who have worked tirelessly on this consultation and the policies/ recommendations.
G-2	Positive	I've been through it all, but of a slog (lol) but worth it, especially all the good work you have put in. So yes, I agree and happy with all of it. Especially with the Registry Office part been kept in. So a big thumbs up with the plan from me.
G-3	Positive	Thanks to you all for your efforts and the time and energy you have put into developing this document. As residents of Athenaeum Street we can see how your proposals will add to both the protection and sympathetic development of the Hoe. We have read it carefully and are happy to support it going forward. Can we ask what else we can do? We are also curious about what might be done to further develop unused, undeveloped spaces within the area. Especially the corner of Citadel Road and Elliot Street.
G-4	Positive	I think that is a thoroughly detailed strategic plan that will be of huge benefit to the Hoe and the wider city. I fully support it,

G-5	Positive	I thank you, and all members of the forum team, for all of your work in the development of this plan. I have read the policies and I agree with the vision and detail of them all. I particularly appreciate that you have considered the current situation with the former registry office site in detail. I support the development policies. I have a high level of confidence that the historic character and quality environment will be preserved and enhanced through the use of this plan. I am happy for my comments to be added to the public consultation comments, I just didn't find the right place to add a single general response!
G-6	Positive	Thanks for still keeping these plans in the public domain. There are some topics which engage me more than others, and I'm afraid I know a little rather than a lot about them but I wanted to say, firstly, how easy they are to read: 'contribute positively, preservation, respect and continuation.'
G-7	Positive	Just wanted to confirm my support for the plan as outlined Thank you for all your hard work in bringing it to this stage.
G-8	Positive	We have looked at the plan and would like to offer our full support to its proposals.
G-9	Positive	I have reviewed the plan documentation would would wish to record my endorsement. I fully support the aspirations and and the detailed proposals set out in the Plan to secure, protect and ensure that future developments are appropriate to this area, recognised and valued, as it is, locally, nationally and internationally for its historic significance, iconic situation and beautiful aspects.
G-10	Positive	We have read the neighbourhood plan and agree with its policies and aspirations.
G-11	Positive	I have reviewed and support the plan and thank the teams for pulling together such a comprehensive and constructive document. In my view, the plan provides sufficient detail to monitor and manage The Hoe neighbourhood (village) so that this special place is protected for future generations. I support the idea of regular reviews and I would hope that any proposed changes in the area are in accordance with the plan, that the plan is not diluted in time and that governance is effective, transparent and equitable.

G-12	Positive	I discovered too late in the consultation process that it was still open although with very little time left. I've entered comments in two sections but wanted to add a general comment here. (I don't live or work in the area concerned, but visit the Hoe area very regularly, at least once a week, if not more often, and love coming here). Having read the article about the existence and plans of the Hoe Neighbourhood Forum in the Plymouth Chronicle, I was enormously impressed by the depth and the scope of this plan, and the seriousness which residents have brought to it. There is real truth in the idea of 'the wisdom of the crowd'; and if you want to find real vision and aspiration, as well as expertise, for a project like this, the ideal way is to ask the residents themselves, the local experts. I was also deeply impressed that, if this plan goes through all the hurdles, it will be legally binding for the local council to adopt it. This is massively important and intelligent. It speaks of a real understanding that you cannot ask people to trust you at all, let alone put in so much time and energy into a project of this kind, if you do not then commit to the recommendations. We all understand that faith in government bodies, national or local, is at an all-time low - and many people believe that the only way to regain any trust at all is to make democracy real. Extend it so that the input of citizens working together is adopted, and adhered to, and we feel that we are no longer powerless and disgruntled but can play a real part in the life of our city. There's so much knowledge, expertise and creativity here, and PCC needs to tap into that for the good of us all.
G-13	Positive	Well done on producing such a comprehensive and informative Plan for the Hoe. Can't begin to imagine how much time and effort has gone into this, it's a fantastic piece of work. Once again well done, on the whole totally agree with views on lines of sight, building heights, planting, environment, and just generally having a 'plan' that everyone should buy into!
G-14	Neutral	Please can I become a member. I will review the policies online.
G-15	Mixed	I support all autonomous, grass-roots self-help organisations that are transparent and democratic. So, I look forward to supporting campaigns of the Hoe Neighbourhood Plan and beyond.
G-16	Positive	This is a comprehensive and well considered plan which I fully support.
G-17	Positive	As resident adjacent (Southside St) I support the provisions of this plan as being locally sourced & close to the voices of residents.
G-18	Positive	(no comments)
G-19	Positive	Agree with consultations suggestions

G-20	Mixed	If a Neighbour hood plan is intended to be a COMMUNITY document reflecting the views of the people who live in the area (as well as other interested parties) there must be constant two way interaction between those who evolve the “plan” and those whose views it purports to represent. Having lived in West Hoe since June 2021 the flyer that it was put through the letterbox at the end of November 2024 was the first that I had heard of The Hoe Neighbourhood Forum. I still have no understanding of how the “Forum” came into being and its ‘membership’ achieved - Election? Appointment ? Nomination? Having read the ‘Plan’ I understand that came into being as a result of The Localism Act of 2011 and is validated by Plymouth City Council and is in consultation with local Councillors yet it claims to be “Politically Neutral” - how can this be the case? The word ‘Political’ is defined in the Oxford Dictionary as ‘relating to the government or public affairs’. I cannot discover (with the exception of Ms Penny Tarrant the Forum Chair) who the members of “The Forum” are and who or what they represent. Equally there is no mention as to who’s business, or Plymouth Councillors interests, are concerned. I cannot discover how or by whom the “Forum” is funded and how its funding is managed. If it has the capacity to engage ‘consultants’ I would have thought that there should also be funds available to produce and make available printed copies of the “Plan”. It would also be helpful to provide a printed simplified version of the “Plan” distributed locally within the community whose views it claims to represent. Why does the “Plan” have to be couched in what I call ‘planning committee speak’?It would be helpful to all parties to have a ‘plain English’ version even If the original document has, for some reason, to be couched in convoluted terminology. All the above having been said I found reading the document (on line) informative and in the main coinciding with my own views about the neighbour hood and its development in which I live. I am however unclear when all is said and done how this document, useful and informative as it is, will have any real ‘clout’ in the future of the Hoe Neighbourhood. It is also unclear how the ‘Referendum” on The Plan will be informed and conducted. It is equally unclear how the ongoing changes, aspirations and decisions will be implemented, funded and monitored.
G-21	Positive	A well thought out and comprehensive consultation document. I look forward to hearing the outcome.

Section 1: Introduction to the Hoe Neighbourhood Development Plan

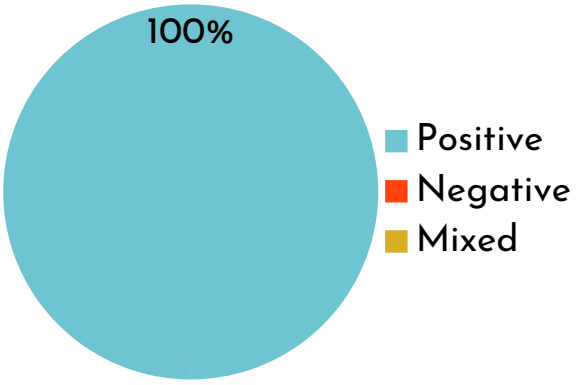
Comments from Organisations

Number of responses: 1 (from Plymouth City Council's Planning Department)

Code	Para-graph	Comment
S1-PCC1	1.7	We have significant concerns about how a number of policies are currently not in general conformity with the strategic policies of the JLP or aligned with NPPF guidance and therefore do not agree that at present the NP has taken 'account of evidence about needs, existing policies in the Plymouth and South West Devon Joint Local Plan, the National Planning Policy Framework (which provides the framework for how Government sees the planning system in England working in practice with primary and secondary legislation) and National Planning Practice Guidance (which provides detailed policy guidance)'. We have made further detailed comments on these concerns under each separate policy and on the Basic Conditions Statement.
S1-PCC2	1.10	*Regarding the Basic Conditions Statement:* There is no attempt in the Basic Conditions Statement currently to explain the draft plan's differing approach to the adopted JLP, the specific circumstances (and associated evidence) that supports this approach or how these policies still meet the test of 'general conformity.' *Regarding the Consultation Statement:* We would recommend that the Consultation Statement is much clearer in setting out the timeline of consultation, who was consulted, how and when with evidence showing this. In addition it would benefit from a summary of each consultation setting out what were the key issues raised and how you have addressed those issues. The examiner will use the consultation statement to judge the effectiveness of the process for engaging the whole community in the preparation of the Neighbourhood Development Plan. *See also the detailed comments under the Basic Conditions Statement and Consultation Statement sections.*

Comments from the Public on Section 1

Number of comments: 4



Code	Paragraph	Comment
S1-1	Positive	Agreed
S1-2	Positive	A well researched and detailed piece of work that should be commended to the Council
S1-3	Positive	Quite technical, but a thorough, overall view of the purpose of the Hoe Plan
S1-4	Positive	Sets out the context well. The consultation has been well-planned, very inclusive and has been advertised well. As a HNF member I appreciate all the hard work that has gone into this.

Section 2: The Planning Policy Context

Comments from Organisations

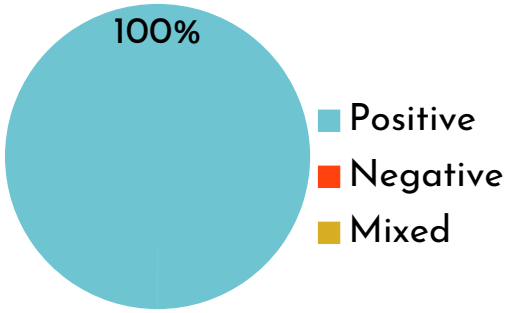
Number of responses: 1 (from Plymouth City Council's Planning Department)

Code	Paragraph	Comment
S2-PCC1	2.1.1	This paragraph states the Plan has been prepared in accordance with NPPF paragraphs 29 and 30 and quotes these paragraphs. Despite these paragraphs clearly stating that 'Neighbourhood plans should not promote less development than set out in the strategic policies for the area or undermine those strategic policies (Neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area)' does not acknowledge or explain why there are policies in the plan that do just this. The Forum will need to update the Plan considering the NPPF published December 2024.
S2-PCC2	2.2.1	We disagree that the NP 'has been developed to be in conformity with the Plymouth and South West Devon Joint Local Plan' as it currently contains policies which 'promote less development than set out in the strategic policies' and that 'constrain the delivery of a strategic site allocated for development in the local plan' contrary to guidance in both NPPF 2024 and Planning Practice Guidance.
S2-PCC3	2.2.3	This paragraph sets out that the 'Plan takes the Plymouth and South West Devon Joint Local Plan strategic priorities, builds on and refines them for specific use in the context of the Hoe area'. The paragraph should set out that NP policy H2 is not in conformity with the strategic priority of JLP PLY27 since it both 'promotes less development than set out in the strategic policies' and that 'constrains the delivery of a strategic site allocated for development in the local plan' contrary to guidance in both NPPF 2024 and Planning Practice Guidance.
S2-PCC4	2.2.4	We disagree that the NP meets the basic conditions and have set out a detailed response to the Basic Conditions Statement in our reply to paragraph 1.10. The NP currently contains policies which 'promote less development than set out in the strategic policies' and that 'constrain the delivery of a strategic site allocated for development in the local plan' contrary to guidance in both NPPF 2024 and Planning Practice Guidance and therefore is not in conformity with the aims, objectives, and policies of the Plymouth and South West Devon Joint Local Plan.

S2-PCC5	2.4.4	We have set out a detailed response to the Consultation Statement in our reply to paragraph 1.10. The Forum has undertaken some consultation and engagement; however it is not clear how this has shaped and provided evidence to support the development of some of the policies contained within the Plan. Given that 6-7 years have elapsed since the first consultation was undertaken, we would recommend that the Consultation Statement is much clearer in setting out the timeline of consultation, who was consulted, how and when with evidence showing this. In addition it would benefit from a summary of each consultation setting out what were the main issues raised and how you have addressed those issues. The examiner will use the consultation statement to judge the effectiveness of the process for engaging the whole community in the preparation of the Neighbourhood Development Plan.
S2-PCC6	2.4.5	This paragraph states that PCC have been consulted throughout the plan making to ensure emerging policies are aligned with JLP. It does not highlight the fact the Council has raised serious concerns over aspects of the Plan throughout its production. We would also highlight that we whilst we have been consulted briefly at varying stages over the lengthy production of the plan, we would not consider that we were actively engaged and working with the Forum in the preparation and drafting of the plan. Following the Draft document consultation on SEA/SA in September 2023 the Council sent a detailed assessment of the policies highlighting those that were considered to not be in conformity with the JLP and should be deleted. In other cases we made recommended revised policy wording to improve clarity, avoid repetition and to ensure applicants would be considered in a consistent manner. While we received confirmation that the Forum had received this advice the Forum made no contact to further discuss the recommendations.
S2-PCC7	Table 1	There are two references to comments from PCC during Policy testing in 2021 and policy rewriting between 2021-2023 however the commentary has not set out or made clear that certain policies were considered at both stages to be not in conformity with the adopted Joint Local Plan and have remained within the Neighbourhood Plan. The Council has been consistent with this advice throughout discussions with the Forum and once we had been supplied with a draft Plan for SEA and HRA Screening in July 2023 and the consultation with the statutory consultees had been completed we supplied a detailed response (September 2023) on all the policies setting out where they might be rewritten to improve clarity for both the public and the decision maker and public. In many cases this didn’t change the emphasis for the policy but simplified the policy and removed repetition.

Comments from the Public on Section 2

Number of comments: 2



Code	Paragraph	Comment
S2-1	Positive	I can only applaud the hard work that has been put in by all the people who worked on the plan.
S2-2	Positive	Again, the context is well set out - and alignment with local and national planning policies has been well considered. The sub-group focus subjects represent important aspects of the plan and this approach seems highly beneficial. The provision of information on the Plan, using a variety of methods, and the creation of opportunities to input, has made participation in the Plan's development inclusive and accessible.

Section 3: About the Hoe Neighbourhood Area

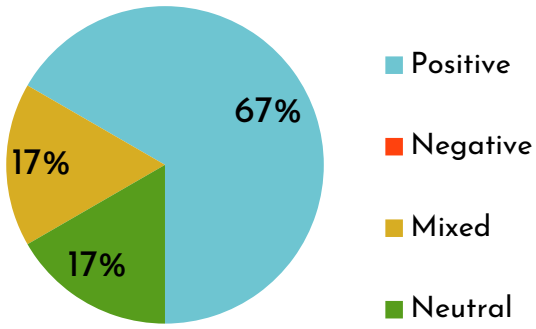
Comments from Organisations

Number of responses: 1 (from Plymouth City Council's Planning Department)

Code	Para-graph	Comment
S3-PCC1	3.4.3	Figure 3 shows the designations and allocations in the Hoe Neighbourhood Area including area boundaries, green spaces, heritage assets, and other features but this shows a different boundary for Local Green Spaces as set out later in the document in Figure 11. We suggest checking the route shown for the South West Coast Path around Millbay Marina Village to ensure this is correct.
S3-PCC2	3.6.29	There needs to be further justification on what this paragraph is trying to say about air pollution in the area and how this is affected by vehicle movements. As a local authority, we are required to review and assess air quality in our area against National Air Quality Objectives. If pollutant levels are above or likely to be above national targets, we need to declare an area as an Air Quality Management Area (AQMA). Plymouth has had a single city wide AQMA due to Nitrogen Dioxide (NO2) exceeding national objectives since 2014. However, from results of monitoring in 2023, Plymouth have met all national Air Quality Objectives for Nitrogen Dioxide (NO2) and Particulate Matter (PM), therefore following confirmation from DEFRA, with affect from 31 October 2024, the AQMA has now been revoked. The published 2024 Air Quality Annual Status Report (ASR) can be viewed by visiting: https://www.plymouth.gov.uk/sites/default/files/2024-09/Annual-status-report-for-air-quality-2024.pdf
S3-PCC3	3.7	Figure 5 states that the area is covered by a Woodland Improvement Area. It is not clear what the status of this is as it is not explained anywhere.

Comments from the Public on Section 3

Number of comments: 6



Code	Paragraph	Comment
S3-1	Positive	Section 3: About the Hoe Neighbourhood Area In general statistics for the wuo area are compared with Plymouth as a whole and England, I think it would be beneficial to compare it to similar areas Exeter and Bristol 3.5.4: Does this density take in the open space in the hoe? If so it seems very dense. Please explain/clarify 3.6.3: I assume that these figures are derives from the output areas as defined in 3.5.1 Please explain/clarify 3.6.17: Are these figures right - any explanation of why such a drop and how does it compare with Plymouth as a whole? 3.6.25: Citadel Road, which 'bisects' the area from east to west - I think it 'runs' from east to west (not bisects)
S3-2	Positive	I am a relative newcomer to the Hoe, but could not love the area more and am fascinated by all of the history, culture and economic statistics that been been presented. I will undoubtedly refer to them simply out of interest in the future. Again, well done for such a brilliant study!
S3-3	Positive	Very well researched and informative. Covers a wide range of topics and issues relevant to the Hoe Neighbourhood area. Interesting and useful comparisons with the wider Plymouth area and also national statistics, which are valuable for informing the Plan policies.
S3-4	Positive	As a member of the Forum since it's inception I know that inclusivity of all who live or work in the area has been the focus throughout. I thank those who have worked so hard to compile this document. As a local resident I have opportunity to meet and talk to visitors and tourists, and understand how much the amenities, the history, and superb views are apprciated.

S3-5	Neutral	Para 3.1.2 I think, and I'm sure the Council hopes, that Plymouth is known nationally, if not internationally, as 'Britain's Ocean City; not just locally. Para 3.2.1 The first sentence is almost certainly repeating a myth – ask Chris Robinson. The bowls lawn in Tudor times was probably where Longroom is now. Crispin Gill used to say the same. Para 3.2.2 A 'monument' is something above ground. I've looked at several dictionary definitions and all seem to confirm this. I don't think anyone would ever call the White Horses of Uffington or the Long Man of Wilmington a monument. They seem to be called chalk figures – obviously Gogmagog was not in chalk, but I think the point still stands. It's difficult to know what they should be called – perhaps 'carved figures', but certainly not 'monuments'. Para 3.2.3/4 The initial fort on the Hoe – Drake's Fort - was proposed in 1590. Construction started in 1592 & was completed by 1596. The present Royal Citadel was constructed, as you say, between 1665 & 1671. The Hoe remained undeveloped until given up by the military in 1871 solely because a clear Hoe provided a clear firing area so that the French invaders could be seen clearly. The use as a 'municipal park' from 1871 arose from the Royal Commission of 1860 that declared the Citadel to be of limited military importance, but it remained a clear firing zone until 1888 when the outworks and ditches on the landward side were sold to PCC & Madeira Road was constructed. See "The Historic Defences of Plymouth" by Andrew Pye & Freddy Woodward of the Fortress Study Group South West (July 1996). I have asked Chris Robinson to comment on all of Section 3.2
S3-6	Neutral	3.1.2 Britain's Ocean City internationally, not just a local thing 3.1.4 Mount Edgecumbe (too many e's) 3.2.5 Park laid out in the 1880s – Norrington's Fountain 1881, Smeaton's Tower foundation 1882, Drake Statue 1884, Pier 1884, Lodge (Cafe) 1887. 3.2.7 The Plan for Plymouth was produced by James Paton Watson and Patrick Abercrombie, Paton Watson's name appears first on the title page and Paton Watson was almost certainly the one who advocated the line of what became Armada Way as he first proposed a boulevard from St Andrew's Cross to the Hoe in 1938 as part of the Hoe improvements at that time, including improvements to Tinside Lido and the Belvedere Incidentally where you mention Beatlebums ... it's not Plymouthians there's no 'u' it's Plymothians

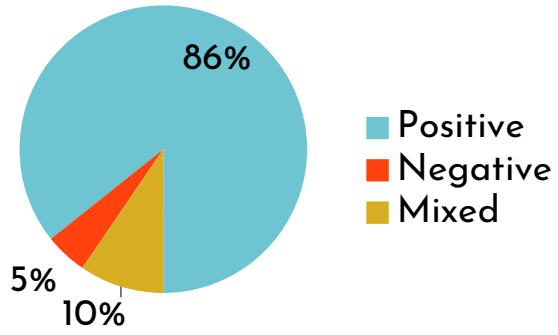
Section 4: A Vision for the Hoe Neighbourhood Area

Comments from Organisations

Number of responses: None

Comments from the Public on Section 4

Number of comments: 21



Code	Paragraph	Comment
S4-1	Positive	The chart is an excellent way to present the hierarchy
S4-2	Positive	Looks like a sensible well thought out vision to me .
S4-3	Positive	This is a positive and forward looking vision for The Hoe area. A way for residents and businesses to have input into development and future use of this historic area.
S4-4	Positive	It will be a real balancing act but wonderful if done competently.
S4-5	Positive	I'm generally very positive about all of this and appreciate all the hard work that has gone into it. I would like to see more consideration given to two things: 1) encouraging the development of waterside facilities which would enable greater access to the waters, with the focus being on leisure and sports. Teens continue to tombstone putting their lives at risk, would diving platforms reduce this? Could better facilities help combat obesity and, along with the development of clubs and groups, provide activities for children and young adults, thus connecting many in our city who don't engage with the natural resources available to them, to the waterfront. 2. Further to this, there is plenty of space within the neighbourhood forum that could be permanently or temporarily allocated to providing activities for children or young adults. Not only would this provide activities for a demographic which has been hit hard over the last 15 years, seeing funding cuts reduce their recreational options. Could this have a positive impact on crime and anti social behaviour? It may also provide greater incentive for graduates from our fantastic universities to stay here after graduation, attracting skilled workers and employers to settle or invest in Plymouth. None of these suggestions are backed by any evidence…apologies for that! Having a young family myself, I am very conscious of the amazing potential the spaces in our neighbourhood have. Are there youth groups as organisations we could engage with to find out what suggestions they may have.

		Apologies if you have already consisted all this. I'm writing this on my phone whilst sorting the kids' dinner out. Finally, thanks again for the hard work you all do in protecting and enriching our neighbourhood.
S4-6	Positive	Love this plan. Makes me feel PCC will start listening to what the public want. I agree with every aspect. I was so glad to see that the registry office was in the plan. I will comment on that separately.
S4-7	Positive	i endorse the expressed need for the protection of heritage sites and policies which will address Blue and Green issues: climate, marine activity, green spaces, trees. Affordable housing needs to be considered and kept in balance with holiday accommodation.
S4-8	Positive	I think the proposed plan is a very timely and necessary project to help preserve and protect the unique community that is Plymouth Hoe. I support the general policies as outlined and believe this is a really important and considered initiative
S4-9	Positive	I strongly endorse the need to protect this very special heritage site by carefully considering what development is appropriate to the area.
S4-10	Mixed	I endorse this vision but feel the importance of The Hoe for the residents of Plymouth and its surrounds has not been included. The Hoe is a much loved area for Plymouth residents and their commitment to the future of the Hoe is just as important as residents and local businesses. Without their support the Hoe would be a poorer facility for everyone
S4-11	Positive	Much work here. Good understanding of Hoe and its needs, and of its community. Excellent objectives with sensible actions.
S4-12	Positive	I'll admit this is the first section I've read, and I'm not going to go back and read the whole document, because it is excellent. I would love to hear how the Hoe Neighbourhood Area will interact with: the Plymouth Sound Marine Park; the City Council; local industries including tourism, music/events and transport; the central Heritage Action Zone which seems to have ignored the heritage of the Hoe; the University sector; the Navy heritage and displays; coastal development regions such as Millbay and Sutton Harbour; and others. I'll be interested to hear more about transport links as the Hoe has specific issues that I don't feel are being addressed by the city's transport strategy. Are residents on the Hoe sufficiently supported by the local economy for good and services and employment? And who will lead on this vision, and monitor progress? I'm very impressed, and want to hear more.
S4-13	Positive	I would support all these objectives.
S4-14	Positive	I'm very pleased that the vision and objectives for this neighbourhood plan give so much weight to protecting what is special about the Hoe, especially its heritage and environmental assets. It's also important to recognise the climate emergency and the measures that will need to be taken to reduce our impact and adapt to the changes that are already happening.

S4-15	Positive	This vision has been drawn up by the people who know this area the best: local residents. Their vision shows genuine care for many aspects of the loal environment. I support all they propose. I support these proposals. These proposals balance the needs of the local community, with protecting the best of the built and natural environment. I therefore support these proposals. The best use should be made of exsiting built and natural environment, while planning for the future. I support what has been proposed. The best use should be made of exsiting built and natural environment, while planning for the future. I support what has been proposed. I agree with much of the proposals. I support much of what is proposed.
S4-16	Mixed	I am concerned that the Vision for the Hoe Neighbourhood Area Plan blindly accepts that parallel Climate and Nature Emergencies are ever-present in community consciousness and I do not accept this as a matter of fact. In section 4.1.5, the "changes that we will all need to make to address global warming and biodiversity loss" are based upon at best a guess of the future and even this statement is based upon the assumption that global warming and biodiversity loss actually is occurring. From when is global warming measured? Certainly, climate change is happening and there is little that man can do to affect this. It has happened throughout the ages and often at an even faster pace than today. Additionally, the doomed attempts by the current UK government to set a net zero target for the UK which even if achieved will have a miniscule affect on global temperature change are farcical and will only succeed in driving the UK economy into the ground. Furthermore, biodiversity loss, I would rather describe as biodiversity change. From when is global warming measured? The theme of a woke agenda is threaded throughout the "Vision" and its subsequent ideas & policies.
S4-17	Positive	I fully support the vision statement.
S4-18	Positive	We must protect our heritage and culture for future generations, honouring the achievements of the past. This unique area affords opportunity to do this with sensitivety to the environment. Most importantly initiatives within the Marine National Park are directed at raising awareness amongst young people of the ocean and green spaces that we want to preserve and enhance.
S4-19	Positive	Agree with the Vision for The Hoe ..... a suggestion for the wording , rather than 'a strong sense of identity', which seems more an individual concept for members of a group. I would prefer, 'a strong Sense of Place', as it is important that the community is linked/identified to the location rather than identifying as a group of people.
S4-20	Positive	I am very heartened to see the emphasis given to protecting nature and heritage in the Hoe area, and for balancing needs of tourists with the needs of residents. You note correctly that outside investor interest and property development has pushed up house prices significantly and changed the demographic of the area. It seems to me that diversity is key to a healthy and creative local economy and making some housing affordable to ‘ordinary’ people including families, is highly desirable. Thank you for emphasising this.

S4-21	Negative	4.1.5 Needs to refer to 'climate change' not 'global warming' - global warming is an old-fashioned term which happens as result of climate change and is therefore encompassed under the climate change umbrella.

Section 5: Hoe Neighbourhood Development Plan Policies

Comments from Organisations

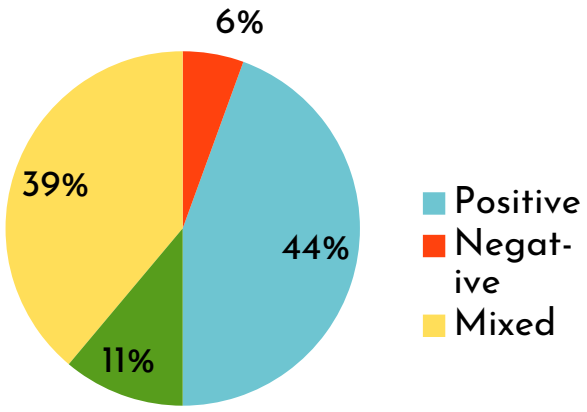
Number of responses: 3

Code	Organisation	Stance	Comment
S5-EA	Environment Agency SPDC	Mixed	We note the three main policies relating to the environment set out in the plan (BG1, 2 and 3). However, there is no mention within the plan of the opportunities of the (Local Nature Recovery Strategy). It would be prudent to incorporate an intention to align the plan with the LNRS. There is a mention of the Critical Drainage Area within the plan, and you may seek to incorporate specific requirements on the management of surface water on the allocated site (HS2 / PLY27). This would link into the intention of the plan to adapt to climate change. On the matter of water quality, the plan doesn't specifically mention the presence of bathing water designations. You may want to highlight and note the importance to avoid adversely impacting the designations through any marine or terrestrial development.
S5-HE	Historic England	Positive	Thank you for inviting us to comment on the Regulation 14 consultation for the Hoe Neighbourhood Forum Neighbourhood Plan. Our role as a national statutory consultee for Neighbourhood Planning focuses mainly on ensuring there is no risk of undue harm to heritage assets. The most common way that risk of harm emerges in Neighbourhood Plans is when new, site-specific allocations for development are being made. Where a neighbourhood plan recommends a site to be allocated for development, there is a risk that heritage assets may be harmed as a result of that development. We note that the draft Neighbourhood Plan does recognise two specific site allocations for housing-led, mixed-use development. However, we also note these allocations have already been made within the Local Plan itself; therefore, such allocations have already been rigorously considered with respect to their impact on heritage assets. So, we assume that there would be little need to revisit the environmental impacts in the context of the emerging Neighbourhood Plan. We welcome the chapter on Heritage, but particularly applaud the sections: Policy H3: Protection of Iconic Views Policy H4: Heritage Assets Policy H5: Buildings of Negative Quality We hope that

			this helps. We have no other comments to make at this time, however we look forward to being consulted again at the Regulation 16 stage.
S5-PCS	Plymouth Civic Society	Negative	We do not agree with the suggestion that AirBnB's have had a 'regrettably impact on the character of the area' in terms of appearance as significant investment has been spent to improve properties used for AirBnB. As I noted I believe that a number of long standing B&Bs look neglected. In terms of AirBnB's taking away properties from the general rented sector the same argument could, but is not, applied to B&Bs. We do not agree to limiting AirBnB's use to 90 days in a year. - There is a policy to support the conversion of buildings divided into flats back into single houses but we are not sure how affordable such houses would be to residents from Plymouth - We note that the Plan at times has a parochial feel e.g. the Hoe is the 'authentic locally-hosted place to stay in Plymouth. I'm not sure what 'authentic' implies about other parts of the City.

Comments from the Public on Section 5

Number of comments: 18



Code	Stance	Comments
S5-1	Positive	Just what I would have wanted for a plan. I Support every aspect.
S5-2	Positive	These proposals and policies seem to have covered everything - loving the emphasis on sustainability. Maybe the tourist hosts - whether they be individuals renting out a room or apartment or hotel owners could be encouraged to join a green tourism network? As is acknowledge the Hoe is a worldwide famous part of our city, but it is also home to many who need to be included in plans going forward. It is a fine balance to juggle, but these peoposals are managing that well.
S5-3	Positive	I am in favour of every aspect of this section. Particularly the protection of any of the heritage sites and prevention of any building or development that would be contrary to the fantastic historical buildings and green spaces that are here now. I'm particularly concerned with what will happen at the Registry Office. As someone who uses all of the Hoe seafront and parks on a daily basis, I want to protect it and improve on other aspects. The renovated and improved Tinside is very exciting and as a swimmer, I would dearly love to see the old swimming pools brought back.
S5-4	Positive	It is important that existing local amentities be kept for the use of the residents and potential visitors, while showing best care for the natural environment. It is important to encourage recycling and litter reduction. I agree with what is proposed, and support it. I agree with these comments.
S5-5	Mixed	ISSUES OF CURRENT CONCERN that I have perceived since moving to the area three years ago - (not in priority order) - 1. NOISE and inappropriate driving by some motorcyclists and car drivers along Hoe Road, Pier Street and west Hoe Road. 2. SPEED at which some motorcyclists and car drivers drive along the above mentioned roads. The Speed reduction 'bumps' sometimes seem to exacerbate the problem as some riders and drivers seem to treat them as a challenge rather than a device limiting speed.SEE Page 54 paragraph c. 3. TREES….pruning particularly in residential streets …specifically in Pier Street.SEE Policies

		BG2 and BG3 pages 49 and 50 SEE ALSO Plymouth City Council Tree Management Principles 2019-2024 The Trees in Pier Street have not been pruned during the time I have lived here (and according to local knowledge for at least two years prior to that) According to a letter from PCC dated 27.9.24 from Harry Watson of the 'Trees Team' they are not scheduled to be pruned until between September 2025 and February 2026. I do not think this acceptable given the present size of the trees and the fact that the branches are now touching the houses. Much is made of the 'iconic' view from the Hoe to the railway station, envisaged in the Abercrombie plan which should be splendid but currently obscured because of lack or appropriate pruning and tree management. NB the management of trees in 'The Mill Bay Marina Village' and in many continental streets and squares. 4. West Hoe Park and the maintenance of beds across the Hoe Neighbourhood. NB Pages 44 - 48 BG1 Some GREAT aspirations BUT unless the will and finance for the ongoing maintenance is in place and heeded they will continue to look untidy and uncared for as at present. The current sorry state of the beds only attracts further misuse and vandalism. 5. Abandoned buildings and derelict sites - their present management and sites NB the corner of West Hoe Road and Radford Road - The former Register office site - The former Quality Inn Hotel Site - The Mill Bay Cove abandoned site (CF Page 58) These and several other smaller sites need constant and vigilant monitoring (with Appropriate funding in place) if they are NOT to continue as general dumping and fly tipping places. They are an eyesore and make Plymouth look as if the bomb sites of 1945 have never been cleared. 6. Ice Cream Vans that are parked in densely peopled tourist areas with their engines running all day are a health hazard. NB Page 52 "noise and air pollution" and the concept of a 'healthy city'. 7. Large commercial refuse bins…on Hoe Road and along the Waterfront in particular and in other prominent positions on and around the Hoe area…are a disgrace. Even If properly managed and securely closed to prevent spillage from wind and gulls, they are a smelly unsightly eye sore. Alternative provision MUST be made not just for Refuse bins in future new build projects, as the "Plan" rightly insists, but in the Immediate future. 8. Poor quality murals in prominent positions should be removed as should ill advise Signage on commercial premises. NB as here so with all the points above Fig.6 on Page 26 is of the essence but aspirations and good intentions need to be Implemented with out delay.
S5-6	Positive	I think that in order to maintain the integrity of the Hoe as a nationally important Conservation Area and a unique open space , only redevelopment on existing built sites should be permitted. Redevelopment proposals should be of a similar mass to the development being replaced and clearly demonstrate how they will contribute positively to the built environment. Perhaps the idea of protecting the existing balance between building and open space could be emphasised?

S5-7	Positive	Positive response to Clause 1 of the Culture, Tourism, and Economy Community Aspirations. I am a regular litter picker of West Hoe harbour and find approximately 50% of all litter pulled from the low-tide beach is food/drink waste. A significant amount of this waste is plastic/single use. I support the use for local businesses on the hoe to switch to use recyclable material/biodegradable material. One of the main unique selling points for these businesses is that they are so close to the ocean, and for this charge a premium for their products. It is therefore within their best interest to ensure this habitat/marine landscape is protected/looking its best. I believe in the aspiration to encourage people to set up initiatives on the Hoe. I have attended several community-led events on the hoe such as tight rope walking, volleyball, skating, wassailing, litter picking and sea swimming. From a student's perspective, the Hoe is an oasis of friend-making as it is a great place to socialise and meet up. The amazing backdrop makes all events feel very special, and is unlike anywhere else in the UK. We should be encouraging these events and letting people experience the Hoe as a place to visit/stay, particularly for people who want to bring groups/events. All cities offer reasons for educated people to stay after university, and I believe the Hoe is one of them for Plymouth. We should be utilising the area for young people so that we retain young professionals in Plymouth bringing innovation, collaboration and investment in the city.
S5-8	Mixed	Blue and Green Environmental Community Aspirations. i. 1.c. I am surprised at the inclusion of ‘diving boards’ here as PCC’s action have made it clear that they consider them to be an unacceptable safety risk. ii. 8. Surely the King’s Harbour Master should be included here. He is responsible for most of the buoyage in the Sound &, certainly, for the jet ski speed limits etc. Has he been consulted? P.71 – The Waterfront and Foreshore. I think you are missing a valuable opportunity to make the case – on environmental grounds & for children’s health – that ice cream pitches and vans must be electrified as soon as possible. We have all seen little children queuing up in a miasma of diesel fumes at their head height

S5-9	Mixed	As a body dedicated to the protection and enhancement of Plymouth Hoe, I wanted to bring to your attention the government's ongoing consultation on proposed reforms to the Bathing Water Regulations 2013. This consultation reflects the government's commitment to improving water quality and addressing the needs of a broader range of water users, including those participating in activities such as kayaking, paddleboarding, and snorkelling. Details of the consultation and its objectives are outlined in the government's announcement, which you can access here: https://www.gov.uk/government/news/bathing-water-reforms-to-consider-water-sports-and-water-quality The consultation document itself, available at the link below, invites views on topics including the flexibility of bathing seasons, expanded monitoring approaches, and strengthened protections for both recreational users and the environment: https://consult.defra.gov.uk/water/bathing-water-reforms-consultation (closes 23 December 2024) Given Plymouth Hoe's excellent bathing water classification and its significance as a key recreational area, the Forum may wish to contribute its perspective to this important process, if it hasn't already done so. I hope this information is helpful, and I appreciate the Forum's ongoing efforts to preserve and celebrate Plymouth Hoe as a destination of exceptional quality and environmental stewardship. Kind regards, Kay
S5-10	Mixed	Just a quick piece of feedback to say: I couldn't see anything on this subject in the policies in The Plan (only in the justification to Policy PT2 - Parking), but as someone who works on the nearby Stonehouse Peninsula and cycles along the hoe most days, I would like to voice my support for any subsequent proposals to pedestrianise The Hoe. This would be subject to the usual exclusions (access for deliveries, Blue Badge holders, buses and, hopefully, bicycle lanes). Supplemented with the parking that seems to happen anyway on the top of The Hoe, this would mean we could enjoy the seafront without the noise and fumes of cars. It would also mean the pavements would be less congested, which is particularly a problem in the summer on Madeira Road. Given that there seems to be so much support for this, I wonder why there is not a Policy laying out a plan for pedestrianisation. Perhaps it is not within the scope of The Plan?

S5-11	Negative	My comments relate to 'Community Aspirations' section related to policies BG2 and BG3, but are not criticism of the policies. f) Made me chuckle - there's a giant scorched patch where the annual Bonfire Night bonfire is lit every year for 3+ months, so reducing BBQ damage to grassed areas is negligible in comparison and something that resources should be wasted on. The grass dies back across the top of the Hoe in high summer anyway due to lack of rain but then comes back when we do get rain. If the grass didn't have to be cut so frequently, there wouldn't be an issue, although I don't reject to the grass cutting as this area is used for public amenity and not a nature reserve. Agree that green flag and blue flag awards should be applied for - surprised the Hoe hasn't got one already. . Compost heap seems irrelevant now PCC will need to implement composting city-wide and would look unsightly and would need a lot of management to prevent rats (we have this issue in our own tiny compost heap, they live under the Crowne Plaza). 4. Water quality - maybe in both designated swimming spots i.e. tinside and firestone. This is currently done locally via Facebook groups and Surfers Against Sewage sewage discharge map. 7. What would be the reason for surveying habitats on private land? What would be the aim of this? Habitats could be broadly categorised using aerial imagery (as is starting to be done for ecological assessments in the private sector).
S5-12	Positive	Agree with the Green policies. Re-plant the Hoe with trees. Create a wildlife area for children.
S5-13	Neutral	The lack of (nonexistence) a Community Hall for the Hoe residents when the Devonport side of the constituency has two such locations is unforgivable especially in light of the recent sale of the Registry Office which, although small, would have been suitable.
S5-14	Mixed	End SWW pollution – water quality warnings etc. good I support HNP provisions. Yes – summer bandstands
S5-15	Neutral	Please extend timetable of 25 bus especially during dark winter evenings

S5-16	Mixed	Parking: the ability for people to be able to get around Plymouth by car & Bus is becoming very difficult. No 25 Bus route doesn't start until 9.30 and ends 6.30 leaving people who live in Barbican/West Hoe little options other than to drive or walk if they are able too. Councils emphasis on cycling with no consideration for Parking on new builds or around Plymouth lives little options for residents and their families. A large proportion of Plymouthians need transport for shopping – taking children to school / Doctors, unable to cycle Plymouth is fast becoming a concrete box jungle with little thought to visual. The entrance to the Ferry Port is disgusting & has been for many years. Buildings being erected are not good quality on the whole and are not maintained, roads, roundabouts and pavements are failing terribly
S5-17	Positive	Seafront stones (West Hoe) need cleaning – currently covered in seaweed. I would like to see the diving board back – this could prevent kids tombstoning. Far side of tinside pool needs some cleaning and maintenance
S5-18	Mixed	Unless I've missed it not enough on the commercial cosmetic touches/signage/furniture that despoil the likes of Duttons, the Corinthian and the Liner Lookout amongst many other waterfront properties. Lion's Den??
S5-19	Neutral	I live on West Hoe Park (tennis courts). I get saddened that in the 15 years I have lived there the park i.e. trees, flower beds & grass edges are increasingly neglected. I have written 2 letters in recent years about the huge overgrown Elder tree which badly needs attention. No reply of course. I am approaching 80 & can't do very much physically anymore having gardened all my life. I understand that money is a huge problem but even once every two years would make a big difference.

Policy H1: Integration with Character of the Area

Comments from Organisations

Number of responses: 3

Code	Organisation	Stance	Comments
H1-EP	Environment Plymouth	Positive	I can understand why, in certain circumstances, the Council is 'objecting' to some of the content. Whilst the overall purpose of these policies appears very sound and protective, I am not sure to what extent the HNP can dictate any change or preferred treatment over the Council's adopted policies on the integration of design concepts. To an extent the wording suggests that the approach currently adopted by the Council doesn't honour the intent here....which may be seen as a little arrogant. The Local Plan, for example, may contain the same intent but it may be expressed in a different way. I would suggest looking at the response received from PCC and adapting the wording as suggested if needed. It is very possible to ensure that the wording of a policy can receive greater definition within the amended wording...the use of 'should' rather than 'must' for example. Otherwise the inclusion of this policy is welcomed to protect and future proof the character of the Hoe area.
H1-PWP	Plymouth Waterfront Partnership	Positive	Agree with all of the above. Future developments must be considerate to the surroundings, and materials used, particularly render needs to be resilient to the elements, and/or any discolouration needs to be actioned quickly. Many new residential builds (Cargo in Millbay as an example), have exteriors that now look tatty and the area is swamped with scaffolding.
H1-PCC	Plymouth City Council Planning Department	Negative	The justification text states ‘The Hoe Neighbourhood Area has four distinct character areas as shown in Figure 7’ this should be changed to ‘the Conservation Area has four distinct character areas’ as there is no analysis of the character of the whole NP area. The justification text also sets out that development proposals must refer to the Plymouth Hoe Design Guide however to have planning weight this should form part of this document as we cannot refer to something as a material consideration which has not been consulted on through the Regulations. As previously advised in September 2023 we consider this to be an overly long policy which repeats itself in

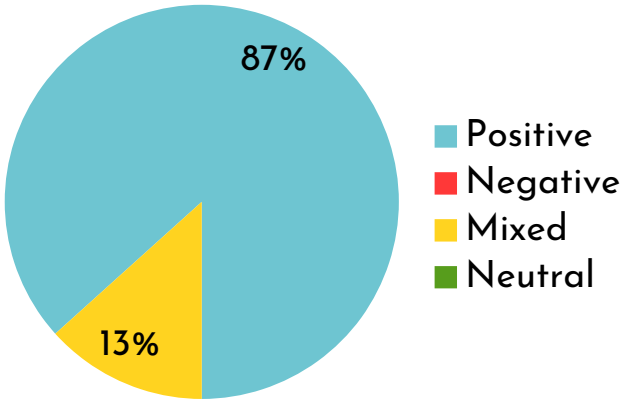
			places (i &v)and is in our view overly demanding in terms of what is required from applicants (iv & x). The NP should not prescribe what documents support a planning application, these requirements are set out through national legislation and the Local Validation List. Wording should not be negative and there is no need to repeat wording from other policies in the plan (viii). We object to the prescribing of specific building heights and consider the definition of 3-5 storeys as ambiguous. This was debated at the JLP inquiry and the inspectors did not uphold the request to set specific building heights. This requirement is both unreasonable and unjustified. As we have advised the Forum through the development of the Plan there are allocated JLP sites in the area where heights of over 5 storeys would be justified and this wording is not in broad conformity with the Plan and therefore would compromise their delivery. We could agree that building heights should respect the Hoe's special character and the scale of the buildings, streets and spaces that make a positive contribution to its townscape, but cannot support setting prescriptive storey heights. Building floor-to-ceiling heights vary of course, including in relation to different use types and mixes of uses and it is important that the policy allows flexibility. Part viii is negatively worded and states that development must not impact views. Most developments will have an impact on views, Planning Officers already consider whether this creates a positive or negative impact, and the extent of its impact in the decision making process and therefore this element should be removed. Part x. set out that a Design and Access Statement should be submitted and accompanying drawings for all development must provide sufficient detail for proposals to be properly understood and include Drawings showing street elevations, sections across the street and for larger developments three dimensional drawings from two viewpoints which is again unreasonable in many cases. We reiterate our suggested policy wording that we sent to you in September 2023: The design of new buildings is expected to contribute positively to and reflect the richness of character and form of the historic area in which it sits. Development proposals which have sympathetic regard

			to the scale, siting, roof lines, materials, fenestration, and colour palette of neighbouring buildings will be supported. Proposals that are considered to have an impact on views of the local cityscape, skyline or landscape, due to their height, scale or location should take account of the character of the area and where appropriate be accompanied by accurate visualisations from surrounding key vantage points. Where appropriate a formal landscape and visual impact assessment should be submitted.

Comments from the Public on Policy H1

Number of comments: 15

Dot Count: 12
(from policy boards at public sessions)



Code	Stance	Comments
H1-1	Positive	How about adding something that covers renovation, replacement and additions to existing buildings In the character areas. This would require the shape and design of architectural features need to reflect the styles used in the surrounding historic buildings.
H1-2	Positive	Yes, in scale & character area (No massive high rise) But energy efficiency & green adaptations
H1-3	Positive	H1.9 should also reflect the symmetry of the line created by Elliot Terrace, The Grand and Azure apartments. This should be extended to development on the former Quality Hotel site bordering the Forum area.
H1-4	Positive	Absolutely. A beautiful and iconic city space which needs to be cherished and protected. There are already examples of development which threaten it.
H1-5	Positive	100% in favour of all of this…. So important to integrate any new development with the wonderful building already here. Any excessively high buildings would have such a negative impact on the area and so important to be careful with architectural features that could jar with existing buildings. All of the wonderful views on the Hoe must be protected.
H1-6	Positive	Policy supported
H1-7	Positive	I support this policy and its objective of ensuring that new development in the Hoe area is complimentary in scale and design with the neighbourhood, as opposed to jarring, low-quality structures or huge complexes that dwarf nearby buildings and stand out like a sore thumb.
H1-8	Positive	Agree with the 10 Ideas under this Policy
H1-9	Positive	This is one of the most important policies as some previous developments have been built with no respect for the heritage of The Hoe's existing housing and is incongruous and damaging to the setting of the many listed buildings.

H1-10	Positive	Important not to lessen historical character of the neighbourhoods. Resident of over 20 years.
H1-11	Positive	Agree with all of the above. Future developments must be considerate to the surroundings, and materials used, particularly render needs to be resilient to the elements, and/or any discolouration needs to be actioned quickly. Many new residential builds (Cargo in Millbay as an example), have exteriors that now look tatty and the area is swamped with scaffolding.
H1-12	Positive	Support this policy, and would add that if permission is granted for a building within the Hoe and Babican Conservation Areas, then if during the redevelopment any modification to the height is proposed this should be considered a signicant and substantial change to the planning consent and require an alternative solution to be required or a new Planning Application to be made.
H1-13	Positive	I think this policy H1 is spot on, many thanks.
H1-14	Mixed	It is fundamental that new buildings are integrated into the character of the area (unlike certain buildings which do not fit with the setting e.g. Crowne Plaza), however there will likely be pushback from developers for street view/3D drawing requirement and whether this will be able to be enforced by the LPA, due to the time and money that goes into producing this work. These are only usually done for large scale or significant developments rather than small-scale which some works in the Hoe development area would be. Therefore I think this point in the policy needs more proportionality. I have never heard about a 'Tall Building Report', so clarity should be given on what is expected in this report if the hoe development plan wishes developers to do one correctly.
H1-15	Mixed	In ii: 'the design of new buildings is expected to contribute positively and reflect the richness of character and form of the historic in which its sits.' Do we have the opportunity to consult at the initial planning stage? I maybe wrong but I believe this was one of the things you asked for previously which was followed by little or no consultation?

Policy H2: High-Quality Design

Comments from Organisations

Number of responses: 3

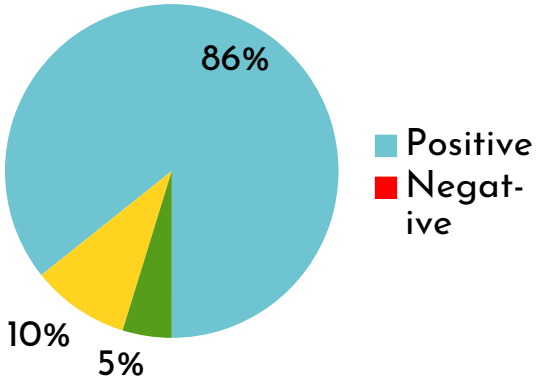
Code	Organisation	Stance	Comments
H2-EP	Environment Plymouth	Positive	Given the high profile of the area one would expect developments of any kind to offer high quality design but, unfortunately, the definition of 'high quality' often varies considerably. Subject to the legal status of the Hoe Design Guide, we would welcome the suggested references for the sake of continuity if nothing else. The HNP may need to consider how to respond to those making decisions (developers and the Council) if the Design Guide isn't formally recognised in some way. I am not sure how this might be achieved but to what extent is it a legal document that 'must' be considered ? However, we welcome the aspirations set out in this policy in terms of protecting standards.
H2-PWP	Plymouth Waterfront Partnership	Positive	We particularly like the design code which will help businesses in our area really deliver quality in such an iconic location.

H2-PCC	Plymouth City Council Planning Department	Negative	Justification text sets out that the 'Hoe Neighbourhood Area has four distinct character areas as shown in Figure 7' however this does not cover the whole of the NP designated area and as previously stated is taken from the Conservation area Appraisal. As previously advised in September 2023 we recommend that you delete this policy. We support the delivery of high quality design proposals but cannot support the requirement for development to have regard to the Hoe Design Guide (AECOM, 2018) and we do not agree with the document being included as an appendix because we do not agree with everything in the document. It is a very detailed evidence base document however we cannot support any design principles/proposals/objectives in the Hoe Design Guide which conflict with or compromise the strategic JLP Policies and/or allocated sites. By inclusion of reference to the Hoe Design Guide, it is giving statutory status to it which is not appropriate as the Design Guide has not been the subject of consultation. Additionally both National and Local policy seek for new development to be of high quality design.

Comments from the Public on Policy H2

Number of comments: 11

Dot Count: 4
(from policy boards at public sessions)



Code	Stance	Comments
H2-1	Positive	Agreed
H2-2	Positive	This should be extended to include remediation works due to defective cladding on high rise buildings in the Forum area
H2-3	Positive	Admirable design guide and insistence on it being followed
H2-4	Positive	Same thoughts as on previous section.
H2-5	Positive	I strongly support the design principles laid out in the Plymouth Hoe Design Guide. This Guide gives specific and practical guidelines for making new development fit comfortably into the historic environment of the Hoe.
H2-6	Positive	I believe now is the time for change, that a very modern design should be able to sit by an extention to an older building or sit by itself as a new building.
H2-7	Positive	I support this policy as an essential requirement.
H2-8	Positive	Agree with Policy H2
H2-9	Positive	Agree, every effort needs to be taken by developers to adhere to the principles. Enforcement maybe an area for improvement though if this is to be consistent. Problems, I would suspect come from when there are existing commercial and residential dwellings not adhering to the "code".
H2-10	Positive	It is important that any development in the 4 distinct areas of the reflects the existing developments. Any new development should enhance the area and should not be approved unless this is the case.
H2-11	Positive	Support this policy

Policy H3: Protection of Iconic Views

Comments from Organisations

Number of responses: 6

Code	Organisation	Stance	Comments
H3-CWGC	Commonwealth War Graves Commission	Positive	The immediate Hoe area the Armada Way view seems to be the greatest benefit to the differing aspects of our memorial.
H3-EP	Environment Plymouth	Positive	We strongly support the inclusion of this protection but recognise that some change over time will, or may, be necessary ...if only to ensure the economic viability of new development. The views out over the Sound and those looking back from the Sound across the Hoe are some of the most loved and well known world wide and should be protected. Again the concept of future proofing may determine how this policy is applied but, in its own right, future proofing may require some flexibility. Again, notice should be taken of the response from the Council and possible changes to the wording considered. However, in the circumstances, it may be that the HNP is the strongest and most appropriate way of setting out what is (a) wanted and (b) needed to protect the listed vistas. We would support a strengthened determination to apply this protection.
H3-HE	Historic England	Positive	We welcome the chapter on Heritage, but particularly applaud the sections: Policy H3: Protection of Iconic Views
H3-PWP	Plymouth Waterfront Partnership	Positive	The Hoe is truly unique with the best vista in the UK, this will protect it for future generations to enjoy.
H3-PCC	Plymouth City Council Planning Department	Negative	We support the principle of safeguarding important views, but as previously advised we cannot support parts of this policy as drafted because it conflicts with JLP Policies PLY27 and PLY28, which will inevitably affect Views 5 and 22, and therefore Policy H3 may compromise the development potential of those sites. Paragraph 044 of Government Guidance on Neighbourhood Planning states: The resulting draft neighbourhood plan must meet the basic conditions if it is to proceed. National planning policy states that it should support the strategic development needs set out in strategic policies for the area, plan positively to support local development and should not promote less development than set out in the

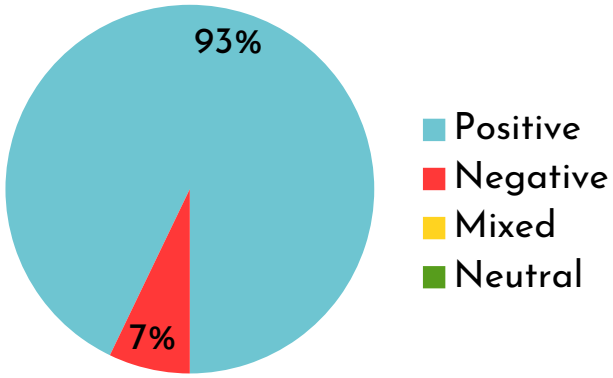
			strategic policies (see paragraph 13 and paragraph 30 of the National Planning Policy Framework). Nor should it be used to constrain the delivery of a strategic site allocated for development in the local plan or spatial development strategy. Link: https://www.gov.uk/guidance/neighbourhood-planning--2#contents Given you have chosen to retain these views we are of the view that as worded it's not in broad conformity with the JLP and therefore we object to this policy. In addition we note that justification for these selected views are based on the Conservation Area Appraisal which highlights the panoramic vista from Hoe Park and Waterfront across Plymouth Sound and northward views along Armada Way as important. It is not clear how other views namely 7, 8, 13, 16, 17, 22, 25 and 27 which tend to be inward looking have been selected and justified. In addition views 9 and 10 whilst taken at slightly different locations appear to be the same view. View 11 is listed as looking 'east' in the policy but 'west' in the Appendix. We note some change to the introduction have been made as suggested to make sure it is more positively worded. However we are of the opinion the introduction of the wording we suggested in September 2023 with the removal of 'distinct buildings' (as it is not clearly defined what these are) and addition of 'where possible' wording as this allows the LA to take a balanced view on proposals. Suggested introduction wording: Development proposals should ensure that key views of heritage assets, areas of landscape, coast and green spaces can continue to be enjoyed where possible. Proposals that may affect these areas or assets should submit a visual impact assessment appropriate to the size and scale of the proposal showing how their development will impact on relevant views. In addition this policy could benefit from simplification of the number of views selected or if they remain would need significant justification for their inclusion. We iterate again the following two sites are not in conformity with the JLP. 5. West from the Hoe towards Cornwall across Millbay

			and Devonport, currently open due to the undeveloped former Quality Hotel site 22. Across West Hoe Park, open vista towards Azure and vacant Quality Inn site

Comments from the Public on Policy H3

Number of comments: 14

Dot Count: 17
(from policy boards at public sessions)



Code	Stance	Comments
H3-1	Positive	Agreed
H3-2	Positive	Iconic Views – Please protect. NO high rise buildings
H3-3	Positive	Temporary structures supporting events on the Hoe should also have regard for the enjoyment of residents and visitors
H3-4	Positive	I note that English Heritage particularly praise this item. It is really important and well illustrated by the photographs elsewhere in the document.
H3-5	Positive	The importance of maintaining these views cannot be overestimated: see what is said about the unfortunate Saltwater Place development
H3-6	Positive	There should be no developments which impact upon the exquisite and unique views as described above.
H3-7	Positive	Views are a big part of what makes the Hoe special. People from all over come to the Hoe to look out over Plymouth Sound and back over the city, admire the grand buildings and the Citadel walls, see across to the beautiful headlands, and get glimpses of Dartmoor beyond the urban fringes. Protecting these views is crucial to the Hoe's appeal to both locals and tourists, and I support this policy.
H3-8	Positive	People come to The Hoe as it is one of the most beautiful water views in the world and must be protected at all cost if Plymouth is to be improved as a destination for tourists. The views shown in the map should be designated as untouchable and protected against developments.
H3-9	Positive	I think the introduction of tree and foliage should be considered when Protection of Iconic views. I also think it is important to look at the hight of existing trees and foliage has already starting to block these views.
H3-10	Negative	Crucial to avoid any over devopment of a potential world heritage city status, with the Hoe being the principal attraction worldwide. Remember the mistakes made by liverpool council. Never risk or take for granted, ones great heritage.

H3-11	Positive	Agree with Policy H3
H3-12	Positive	I was really pleased to see the prominence given to the protection of views from the Hoe and its neighbourhood. It's very easy to forget how crucial they are - until you find a block has sprung up, the view has gone, and - if it's close to where you live - your daylight has diminished. One of the joys of the Hoe is the sense of space and open horizons. It's enormously restorative to well-being just being up there, with so much space around. Very tall tower blocks of flats have been appearing around Sutton Harbour over the last decade, and even taller ones are planned. It's significant that these decisions have been made without any wider consultation about what sort of skyline we want our city to have. Are we a high-rise or a low-rise city? Do we have to ape the skylines of, say, San Francisco or even Barcelona? What about Plymouth's own character? It seems as though nobody has thought it worth thinking and talking about, let alone having a public consultation about. Thank you for making a real case for protecting these views that bring so many people to the Hoe and the Sound.
H3-13	Positive	Support this policy. I would add that the iconic views which are unique to Plymouth. The current cityscape is the result of geological, geomorphologic processes and historic developments that distinctly create a Sense of Place for all who visit the Hoe and Plymouth. To obscure or compromise the views maybe seen as destroying a major asset to the city.

Policy H4: Heritage Assets

Comments from Organisations

Number of responses: 7

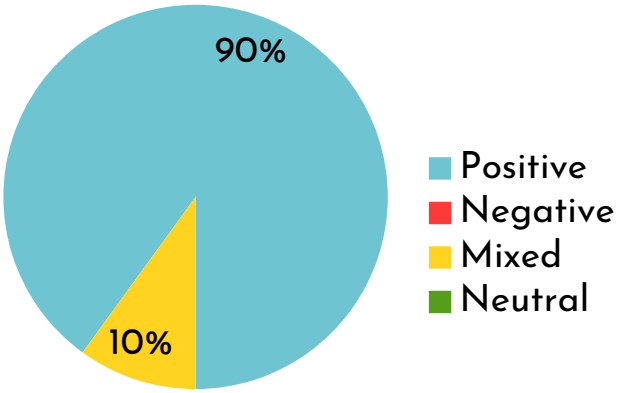
Code	Organisation	Stance	Comments
H4-CWGC	Commonwealth War Graves Commission	Neutral	….if the neighbourhood plan is enacted as you hope then it should ensure that all areas within close proximity to the memorial are afforded even more local protection.
H4-DIO	Defence Infrastructure Organisation	Neutral	I write in relation to the above mentioned consultation and thank you for the opportunity to comment on the pre–submission version of the neighbourhood plan by 6th January 2025. The military history of the Hoe and the significance of The Royal Citadel within it is very much recognised by MoD and the narrative within the neighbourhood plan is welcomed. The Neighbourhood Plan Forum will no doubt be aware The Royal Citadel is due for closure and disposal from 2035 when the current users move to more modern and sustainable facilities. However, until this time The Royal Citadel will remain an MoD site in operational military use. The content of section 2.2 of the draft Neighbourhood Plan is noted in relation to its intention to work alongside and build on the strategic priorities of the Plymouth and South West Devon Joint Local Plan. It would appear that the timescale for the closure and disposal of The Royal Citadel and the end date of the period covered by the Local Plan of 2034 are likely to coincide. As such it would appear that there will be opportunities to consider the future of The Royal Citadel in future iterations of both the Local Plan and Neighbourhood Plan and MoD would welcome further engagement with the Neighbourhood Plan Forum at an appropriate point in the future. Finally, it is noted that a number of the plans within the Draft Neighbourhood Plan include a letter ‘P’ to the South Eastern corner of the Royal Citadel which implies that this area is a public car park. I would point out that whilst the area in question is self-evidently used for parking it is ‘behind the wire’ within the military site and is part and parcel of the military use of the site. It is suggested that the ‘P’ is removed from this location to avoid any confusion going forward. Should you have any queries regarding the above please do not hesitate to contact me.
H4-EP	Environment Plymouth	Positive	If anything we would suggest that this policy is strengthened if possible but we are aware that there are already many applicable conditions both in local and national development planning. It may be worth adding that a 'reference' from an appropriate heritage body might be

			required in certain circumstances. I suspect this may be of some controversy given the proposals to close and, perhaps, develop, th Citadel site...another RWY mix ? So, is there any support for the way in which the HNP would identify what is considered as a heritage asset (with or without existing permissions) and the extent to which the HNP can 'determine' how they are reviewed ? PCC will no doubt apply the standard methods of consultation for example, but is there anything that focuses the HNP on potential 'trigger points'? Has, for example, a scale of importance been considered for sites and building that should not be damaged from a HNP point of view and would this complement the existing lists of protection ? We would support the inclusion of this policy but are aware that the Council may consider there to be sufficient protection so the wording will need to be assertive and difficult to misinterpret or disregard.
H4-HE	Historic England	Positive	We welcome the chapter on Heritage, but particularly applaud the sections: Policy H4: Heritage Assets
H4-PCS1	Plymouth Civic Society	Neutral	We suggest that more needs to be said about the future of the Citadel, although as we all agreed there remains uncertainty around this site. It would be good to know what the Hoe Neighbourhood's preferred option is e.g. for the MoD to remain but if they do vacate the site to be used, for example. as a centre for arts and culture. - As per Richard's earlier correspondence with you, would you ensure that the Belvedere Memorial Garden on Plymouth Hoe is included in the list of heritage assets.
H4-PCS2	Plymouth Civic Society (2)	Neutral	I have done a word search on the Hoe Neighbourhood Plan pdf but could find no mention of the Belvedere. Please take a look at the correspondence I had with the Council back in 2021, which was never acted upon by them. The Belvedere is an important site for war memorials as well as being a listed structure. The military refers to the site as the Polish War Memorial, photograph below. In addition, I have photos of all the memorials in the Memorial Garden commemorating various wars since WWII.
H4-PCC	Plymouth City Council Planning Department	Negative	We are of the view that this policy does nothing to add a local dimension to existing national and local policy already, and as such suggest that this policy is not needed and should therefore be deleted.

Comments from the Public on Policy H4

Number of comments: 10

Dot Count: 7
(from policy boards at public sessions)



Code	Stance	Comments
H4-1	Positive	agreed
H4-2	Positive	I am distressed at the state of the Hoe seafront. Hopefully this policy will ensure that the tailings and steps get maintained. Wild swimming is now highly popular and there is no where at present to acres the sea to swim at low tide. In the winter. It's dangerous at Tinside beach to cross the stones. The Victorians ensured swimming was possible in a pool at low tide or in rough seas. Without a sea pool this is now a huge problem. Brilliant that this policy might ensure positive change.
H4-3	Positive	Yes indeed. Good to spell it out although it should be obvious.
H4-4	Mixed	While understanding the principles behind the policy it is also important to ensure that historic buildings are able to adapt to changing weather conditions and do what is necessary to upgrade resilience and to make better use of modern materials.
H4-5	Positive	I knew that the Hoe had many listed buildings and other structures, but I was surprised to learn how many of the interesting features in my neighbourhood were not already protected by special designations. I strongly support the local list project and its objective to identify and protect the buildings, structures, signs, spaces, and other features that make the Hoe such an interesting place to live and to visit.
H4-6	Positive	The Hoe has a large congregation of listed buildings not often seen. These buildings and their environment must not be impacted by inappropriate sited, designed or overbearing height of new developments.
H4-7	Positive	Agree
H4-8	Positive	Agree with Policy H4
H4-9	Positive	I agree. I didn't realise Plymouth had so many historic assets.
H4-10	Positive	Agree with this policy and think that development which has a positive impact to the Heritage Asset of the Hoe Neighbourhood Area in terms of scale and quality of build would be welcome.

Policy H5: Buildings of Negative Quality

Comments from Organisations

Number of responses: 4

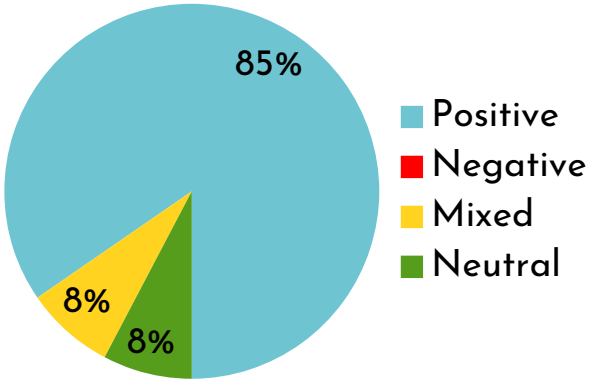
Code	Organisation	Stance	Comments
H5-EP	Environment Plymouth	Mixed	The strength of this policy relies heavily on opinion - who decides which buildings are of negative quality and how is this determined - so the wording needs to take account of how much 'clout' the HNP will have once adopted. It is a brave approach and one that may be difficult to apply but, in terms of the principles of high quality expectation, it is welcomed especially where sites are to be redeveloped entirely.
H5-HE	Historic England	Positive	We welcome the chapter on Heritage, but particularly applaud the sections: Policy H5: Buildings of Negative Quality
H5-PCC	Plymouth City Council Planning Department	Negative	We continue to question the appropriateness of identifying buildings in this way in this document, and we question the evidence and justification for this. Some of those identified are quite recently completed and some have attracted awards, indicating some consensus around their quality. In addition there appears to be an inconsistency between work in the Hoe Neighbourhood Forums Design Guide (September 2018) and the proposed Neighbourhood Plan. Building Quality (Figure 12) of the HNF Design Guide identifies approximately five buildings in total that are of negative quality, whilst also identifying buildings that make a positive contribution or have a neutral quality. A number of those shown making a positive contribution alongside several of neutral quality in the Design Guide are now identified in Figure 10 of the Neighbourhood Plan as being of negative quality. Therefore it unclear why the Forum has identified and included these additional buildings in the NP. The Plan also references the Conservation Area Appraisal and Management Plan (2008) as part of the justification for this policy. It is noted that was undertaken 10 years before the Design Guide and Figure 5 shows a Plan showing the ‘Quality of the Built Environment’ which shows approximately 14 buildings that are considered to be of ‘negative quality’.

			Having considered the position of the Conservation Appraisal goes on to state on page 37 that ‘ It is not immediately obvious that there are significant negative factors that affect the Hoe Conservation Area’ and this is supported on page 38 by photos showing negative factors which only identifies four buildings of negative quality of which three have significantly changed since the report was written. Pierson House is now redeveloped; Durley House has been refurbished with new external finishings and the Quality Inn has been demolished and is allocated in the JLP Policy PLY27 for hotel led mixed use regeneration. This policy is superfluous because other policies proposed would require new development to be of a high quality when redevelopment opportunities present themselves while development in Conservation Areas is already covered by National Legislation on the built heritage, the NPPF and JLP Policy DEV21 therefore we recommend the policy is deleted. The policy also does not have regard to the energy and carbon issues around complete removal of existing buildings. Climate emergency principles highlight that redevelopment of existing buildings is better in terms of carbon emissions. The Climate Emergency Planning Statement seeks refurbishments and improvements ahead of demolition. We would also highlight that this is a circular reference policy, referencing within the policy other policies of the plan. This is not helpful for decision makers.

Comments from the Public on Policy H5

Number of comments: 13

Dot Count: 8
(from policy boards at public sessions)



Code	Stance	Comments
H5-1	Positive	Good
H5-2	Positive	Absolutely agree!
H5-3	Positive	Ambitious aim, but important to state and insist on.
H5-4	Positive	How did they ever get passed? Could they be knocked down?
H5-5	Positive	Support
H5-6	Neutral	Appendix 4 not sure consolidated is the right work, located perhaps
H5-7	Positive	As I walk round my lovely, old Hoe neighbourhood, I see so many beautiful buildings and details that make this place special. Then there are the carbuncles -- buildings that scream out that they don't fit in here. In my immediate neighbourhood they are in-fill for parts of Georgian terraces that were bombed in WWII or grim-looking blocks of flats. These obviously served a need for housing after the war and through to the 1970s but boy are they ugly! The more recent developments, such as the huge student housing blocks on Notte Street or the Peirson House apartments, were built in a time when people should have known better. I'm glad the plan identifies the buildings that shouldn't be here, even if it's a bit of a naming and shaming exercise.
H5-8	Positive	Whilst no one would suggest that the buildings identified should be automatically listed for demolition, they do demonstrate how many inappropriate developments, old and new, have been allowed to deface this conservation area. It should be noted that not all new developments are listed and that some show how sympathetic developments can be built.
H5-9	Mixed	The list of buildings of negative quality that has been established by Hoe Neighbourhood Forum in Appendix 4, I don't agree with them all.

H5-10	Positive	Whole heartedly agree with Policy H5. New buildings should not under achieve within their setting. Example Registry Office. Always has been a cheap looking 1980's pavilion more akin to a Sainsbury's style extension than key setting to the greatest day of your life. There are other examples.
H5-11		
H5-12	Positive	This is very important policy. In the past, mainly post war buildings were constructed in bombed sites and they did not respect the character and architecture of the surrounding buildings. So the replacement of any of these buildings should be with ones which blend in and are of a similar design and character to those surrounding them.
H5-13	Positive	Fully support this policy. It should be reinforced that the citing of buildings identified in the Conservation Appraisal and Management Plans for The Hoe and The Babican as being of Neutral or Negative Quality should not be used as a precedent for new development.

Policy H6: Heritage and Energy Efficiency Retrofit

Comments from Organisations

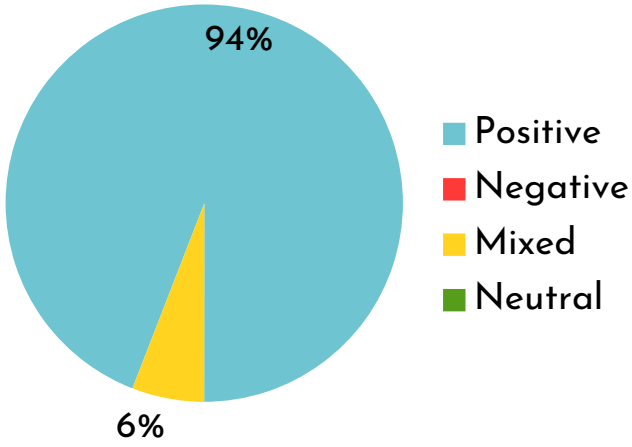
Number of responses: 3

Code	Organisation	Stance	Comments
H6-CAP	Climate Action Plymouth	Positive	I applaud your efforts to introduce energy saving and renewables technologies to the Hoe housing stock. Done sympathetically, this is a win-win. Air source Heat Pumps can be an issue in historic setting and I wonder whether ground-source heat pumps and networks have been studied in enough detail? Kensa are a West Country company making serious inroads into sustainable ground-source heating for period properties. For transport, I would like to highlight that whilst active travel includes walking and cycling, it's normally all to do with cycling with pedestrians being an afterthought. I have also spoken about just this issue with the council about Plymouth generally.
H6-EP	Environment Plymouth	Positive	This policy is welcomed as it will assist in adapting the area in terms of both the low carbon economy and its adaptation to climate change. Unfortunately, some of the possible options (solar panels and heat pumps for example) may prove to be difficult to install in already developed or heritage buildings so support for alternative low carbon options would be welcomed. We would support this policy and perhaps suggest an addition to link this with social sustainability, warm homes and improved health.
H6-PCC	Plymouth City Council Planning Department	Mixed	Reference to Policy DEV22 should be removed from the justification text and key evidence list, this relates to the Cornwall and West Devon Mining Landscape World Heritage Site which is not within the Neighbourhood Plan Area. In addition it should be clear in the justification around the Hoe Design Guide that this is not part of this document and therefore does not carry weight in planning terms. We are pleased that the minor changes suggested in September 2023 have been incorporated into the Draft policy and we support this wording.

Comments from the Public on Policy H6

Number of comments: 17

Dot Count: 3
(from policy boards at public sessions)



Code	Stance	Comments
H6-1	Positive	Very Good
H6-2	Positive	There is no reason the historic character of buildings cannot be preserved while bringing the buildings' environmental and energy management up to current standards. Many unpleasant changes made to properties prior to them being listed are now being preserved unnecessarily.
H6-3	Positive	Yes, retrofits need to happen, climate change
H6-4	Positive	This is great, but I think we should have a policy like the city of Bath that people can access and guide them.
H6-5	Mixed	I endorse this policy but would like to see the policy include double glazing for listed buildings. This would need to be executed to be virtually invisible but would make listed building energy efficient which endorses the council's aim of being a green city
H6-6	Positive	Necessary - but the word 'sensitive' is important and could be subjective.
H6-7	Positive	I don't know much about many of these things technically, but if they can be used in a sensitive way to the historically attractive buildings, I would love to peruse them
H6-8	Positive	This is very important - and may require a change to Historic England guidelines. Historic England in this area are particularly reluctant to agree to changes which would improve energy efficiency/resilience and this needs to change.
H6-9	Positive	These proposals are encouraging, and hopefully Plymouth City Council will work with local residents and organisations like Historic England to bring them to fruition.

H6-10	Positive	Hurrah for policy H6! As the owner of a listed Georgian house, I applaud this encouragement for making heritage buildings more energy efficient as long as it is done carefully to preserve the features and character that makes them worthy of listing.
H6-11	Positive	I live on The Hoe in a grade 2 listed building and it is very concerning that encouragement of the right type of improvements is not encouraged but often is discouraged. This appears to be due to a lack of recognising improvements that other cities, e.g. Bath and Edinburgh, have moved forward on and proposed and encouraged appropriate improvements that Plymouth still do not. It is essential that this changes so that listed buildings are not to become so unaffordable as to be left to fall into disrepair.
H6-12	Positive	May be the place to find out more about Grade 1, 2 *,and 2 listed buildings and what glazing is allowed and what should change to be incorporated into energy efficiency.
H6-13	Positive	Wholeheartedly agree with Policy H6
H6-14	Positive	I agree, but I know from experience how costly this can be, and some very old buildings have challenges structurally with introducing changes, even though there is the desire to welcome them.
H6-15	Positive	Supported
H6-16	Positive	It is more and more important that people who live in energy poor homes should be allowed to increase the level of insulation by the numerous methods available. If this is done within the English Heritage guidelines it will be a positive. Everyone should be able to live in a warm well insulated dwelling.
H6-17	Positive	Support this Policy

Policy H7: Balconies and Roof Gardens

Comments from Organisations

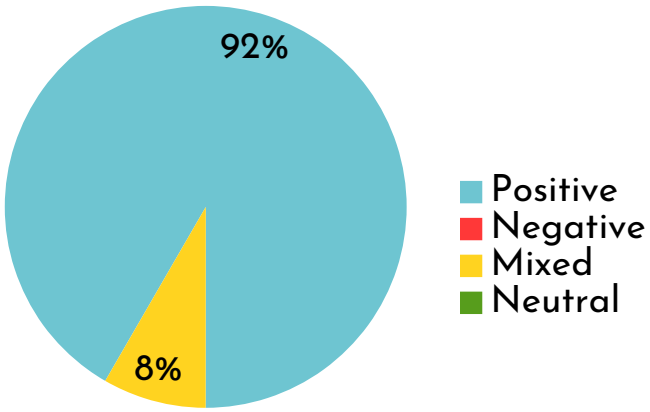
Number of responses: 2

Code	Organisation	Stance	Comments
H7-EP	Environment Plymouth	Positive	This will not apply to many of the existing buildings but, in terms of new developments or refurbishments, there is great potential for future proofing and the opportunity to provide, at least, a small area for food growing and personal green space. This, in turn, has an impact on mental wellbeing. The policy is welcomed.
H7-PCC	Plymouth City Council Planning Department	Negative	There is currently repetition with other policies within the HNP as impact on character and amenity covered elsewhere in this plan and JLP so we would suggest slight wording change and removal of heritage clause as this is covered in HNP policy H4. We would also suggest removing reference to SPD in policy as this could change in the future and as it stands applications would be considered against the relevant SPD. The addition of balconies or roof gardens will always have an impact, the key in planning terms is whether the application would result in an unacceptable impact and this should be reflected in the wording. As with previous advice given in September 2023, we continue to suggest the following wording which would make the policy acceptable: i. Development proposals which include balconies and roof gardens / terrace areas that require planning permission will only be supported if they: - do not have an unacceptable impact on the roofscape of the immediate or surrounding area; - do not have an unacceptable impact on the amenity of neighbouring residents by virtue of overlooking.

Comments from the Public on Policy H7

Number of comments: 12

Dot Count: 2
(from policy boards at public sessions)



Code	Stance	Comments
H7-1	Positive	Agreed
H7-2	Positive	Balconies, no overlooking, OK
H7-3	Positive	I think these should be encouraged where possible, garage roofs are large areas that can become natural habitats for wildlife. In our stressful lives these can also provide extra space for those with simply a courtyard, or small gardens. Some may worry about them over looking but with appropriate green screening this can be mitigated.
H7-4	Positive	Yes. Nice things to have but could impact negatively on neighbours.
H7-5	Positive	Again, important to maintain the integrity of the Hoe and to protect the residents who live here.
H7-6	Positive	It would be good if these principles were already applied - can they be applied retrospectively?
H7-7	Positive	I wholly agree with these requirements for any proposals that might come forward without banning them completely in an appropriate location.
H7-8	Positive	It is key that these should not cause any inconsiderate impact on neighbours. Planning permission should be obtained in it usual way. Agree with the INTENT:
H7-9	Positive	Agree with Policy H7
H7-10	Positive	Agree. Aside from the importance of privacy though, if balconies (particularly in blocks of flats), were smaller this might negate residents using this space for storage for bikes/ladders/kids toys/broken garden furniture and the like - which can look unsightly, especially in areas in view of visitors.
H7-11	Positive	Agree with this policy that it should be demonstrated that it will have a positive rather than a neutral impact to the area.

H7-12	Mixed	We believe that this section should be more balanced. Firstly, it should reflect that, in a densely populated part of town, such as ours, some overlooking is inevitable and secondly, in the context of 'overlooking', it should cover over-large roof extensions, which are an equally, if not more obtrusive, form of overlooking due to their year-round regular usage. This diagram is from PCC's Planning Guidance Appendix 1: Residential Extensions and Alterations. Clearly, "large, ill-proportioned "box type" roof extensions should be resisted. We know of one, prize winning local guest house, that lost significant business because the rear rooms were less popular after a large roof extension was built opposite.  *Figure 10: Dormer windows*

Policy H8: Retail and Commercial Frontages

Comments from Organisations

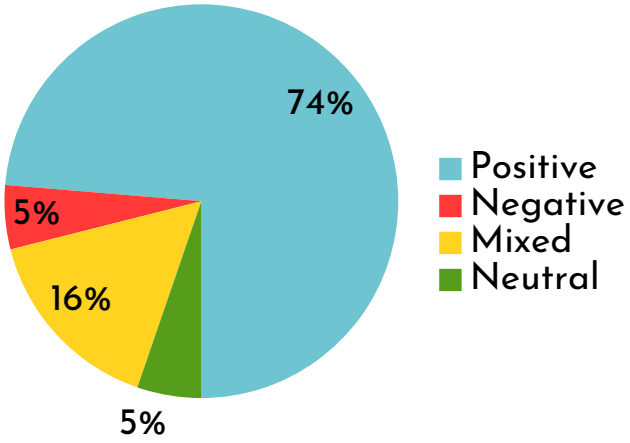
Number of responses: 2

Code	Organisation	Stance	Comments
H8-EP	Environment Plymouth	Positive	The inclusion of these policies are welcomed to ensure that new installations are in-keeping with the area. It may be worth asking for an archive of potential installations to be instigated as many of these developments take place individually and it is not always possible to pre-assess what a new addition to a street front might look like. This, in turn, may determine what the shop signs look like. Just a quick note on the night time economy.....it may be worth adding in something on how this signage is lit as this can have a significant impact on the night sky and any homes in the area.
H8-PCC	Plymouth City Council Planning Department	Positive	Justification text 'Given the high levels of part-time employment and the high levels of unemployment in the Hoe Neighbourhood Area, many local people are likely to be employed locally' needs clarification as it's unclear how high unemployment links to local employment. We are pleased that the minor changes suggested in September 2023 have been incorporated into the Draft policy wording.

Comments from the Public on Policy H8

Number of comments: 19

Dot Count: 7
(from policy boards at public sessions)



Code	Stance	Comments
H8-1	Positive	Is there any way we can audit existing signage/features that have a negative quality and get changes made?
H8-2	Mixed	The shops on West Hoe are an important part of the overall Hoe experience and it is important that the frontage and appearance of these are kept in line with the overall Hoe experience including the pedestrian footways and parking. The footways and pedestrian ways on West Hoe by the shops are somewhat unkept and not of the quality of the pedestrian ways on the opposite side of the road and are not attractive to visitors. The pavement is old tarmac and narrow in places. However the pedestrian ways on the opposite side of the road (where the new houses are) and indeed on the other parts of the Hoe are vastly superior in quality. The wooded flower tubs are also unkept. I feel that this pavement area should be looked at and developed further to give a better experience walking down from the start of West Hoe.
H8-3	Neutral	Commerical & other signage – minimum!
H8-4	Mixed	Good design is an excellent objective but The Hoe Forum needs to demonstrate its support to local businesses. They are intrinsic to the facilities and job opportunities offered to local and Plymouth wide residents. We do not want local businesses to view The Hoe Forum as being unsupportive and critical of their operation. I think this policy should demonstrate The Hoe Forum wants businesses to succeed and would like to be a partner with them in these aims.
H8-5	Positive	It is not just signage. I particularly welcome the last bullet point about protecting public access. We already have examples of commercial activity on the waterfront discouraging and sometimes preventing public access to what has always been public space.
H8-6	Positive	Important to protect the integrity of what we have here on the Hoe. We've all seen ugly developments that spoil an area, and the Hoe is far too precious to risk that.
H8-7	Positive	Agree

H8-8	Positive	I support the need for higher standards for business premises in the Hoe area to avoid the Hoe looking like just another tatty seaside area. Some of the signs and pavement furniture in particular make the area look unkempt.
H8-9	Positive	A set of sensible requirements.
H8-10	Positive	Important not to allow posters for advertising stuck up in windows.
H8-11	Positive	I absolute support this. In areas where this isn't controlled an area can look run-down very quickly. Look at the yard with all signage being consistent, it creates a beautiful, cohesive visitor and residential experience and ensures integrity of the area is maintained.
H8-12	Negative	Why no pictures in the negative impact section? Negative impact: Don't agree with the Walrus as think it is a reasonable example of post war architecture although it could present itself better, likewise the Register Office, be careful what you wish for as a replacement is likely to be far less in keeping.
H8-13	Positive	40 years in retail, Plymouth as a whole needs to buck up to attract a higher level shopping experience. Wholeheartedly agree with Policy H8
H8-14	Positive	Supported
H8-15	Positive	The introduction of modern retail signs and changes to frontages should not be allowed. The owners need to respect the architecture of their property and ensure that any changes made do not detract from the historic appearance.
H8-16	Positive	Fully support this policy.
H8-17	Positive	I agree with this policy, the facade of a building can make all the difference to how a place is perceived e.g. Royal William Yard (high-quality design) vs Plymouth City Centre (low-quality design). They set a tone for the area and Plymouth Hoe should follow in the footsteps of Royal William Yard.
H8-18	Mixed	Policy H8: '.....altered or extended or commercial premises....' While I appreciate that this might benefit to traders and shoppers alike, it would be a pity if they descended to selling sea-side paraphernalia.

Policy BG1: Local Green Space Designation / Development on Green Spaces

Comments from Organisations

Number of responses: 3

Code	Organisation	Stance	Comments
BG1-EA	Environment Agency SPDC	Neutral	We note the three main policies relating to the environment set out in the plan (BG1, 2 and 3). However, there is no mention within the plan of the opportunities of the (Local Nature Recovery Strategy). It would be prudent to incorporate an intention to align the plan with the LNRS.
BG!-EP	Environment Plymouth	Positive	We suspect this is likely to be the most controversial of the policies given the Council's recent interaction elsewhere. The inclusion of policies that enhance the protection of blue/green space is welcomed as, when combined with existing PCC policies, it should protect and define the use of clearly acknowledged areas. It will be important to be able to provide the evidence for the protection (this should already be available - there are some nationally recognised species present on sites on the Hoe). Again, the HNP needs to ensure that it complements and boosts the powers of the PCC and national policies. Is there any option for the inclusion of protective policies for the surrounding blue areas ? - perhaps in terms of litter disposal, plastics, pollution control and water quality ? Again, there is the potential here to support and strengthen existing citywide policies and plans.
BG1-PCC	Plymouth City Council Planning Department	Negative	We note that this policy supported by the Local Green Space Audit (June 2021) however we have significant concerns that the NP seeks to use this designation to cover large parts of designated area when the majority of the sites included already benefit from significant protection. Policy DEV27 of the JLP already provides significant protection for the majority of the areas highlighted and sets out that: ‘Existing open spaces, which also includes designated City Green Spaces and Neighbourhood Green Spaces, should not be built on unless it is demonstrated that the open space is surplus to requirements; or the loss will be replaced by equivalent or better provision in a suitable location; or the development is for alternative sports and recreation provision, the needs for which clearly outweigh the loss. In making this judgement regard will be had to evidence of the identified value of the green space’s attributes as set out in relevant open space assessments and account will be taken of the plan’s green space and

			play accessibility standards. Development will be resisted on sites where the functions and characteristics of the greenspace will be lost and mitigation is not possible'. The justification text references 'Plymouth's Green Space Strategy' and its Background Report' however this is out of date and information should be taken from the JLP evidence base in particular the open space assessment and refences to these documents removed from the NP. Whilst we are broadly supportive of the use of this type of policy as we were in the adopted Plympton St Mary NP its use needs to be consistent with NPPF in that it is consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. The NPPF is also clear that the designation should not include large tracts of land, the audit has concluded that none of the sites identified meet this test however when combined (6 of the 8 area boundaries joined on the map) they total 23.43ha which covers approximately 39% of the designated area. We do acknowledge that the inclusion of City and Neighbourhood Green Spaces were included in the Plympton St Mary NP policy on Local Green Spaces. It is unclear whether the Hoe Foreshore has been removed as suggested as it does not appear in Figure 11 however it remains shown in Figure 3 and remains within the list as set out in the policy wording. It also concerning to see that the designation on Figure 11 now covers PLY27; Millbay Park site has expanded to include the football pitch and a developed area between the football pitch and Walker Terrace currently occupied by the armed forces and stretches further east from Hoe Road covering a developed part of Lambhay Hill. None of these sites of previously developed land were assessed in the 'Local Green Space Audit for The Hoe Neighbourhood Plan – December 2022' which is used by the Forum to support sites inclusion and therefore **given the lack of supporting evidence should be deleted** from the map shown in Figure 11. Guidance on Local Green Space is clear in stating that this designation should be used only on green space not on previously developed land and as currently set out. The apparent inclusion of PLY27 alongside these additional sites leads us to believe the policy is being used to prevent development rather than to protect green areas and as worded it is not in broad conformity with the JLP. On this basis, we strongly object to the designation of these sites as local green space.

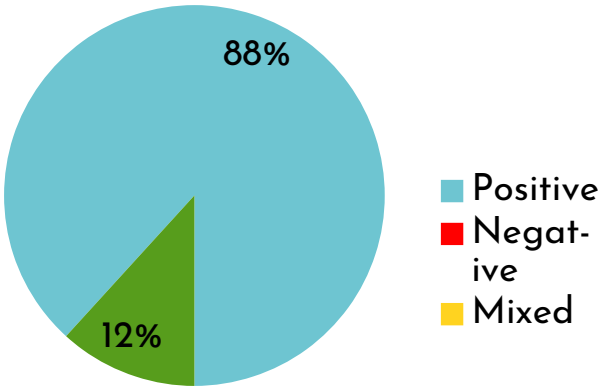
			Paragraph 044 of Government Guidance on Neighbourhood Planning states: The resulting draft neighbourhood plan must meet the basic conditions if it is to proceed. National planning policy states that **it should support the strategic development needs set out in strategic policies for the area**, plan positively to support local development and should not promote less development than set out in the strategic policies (see paragraph 13 and paragraph 30 of the National Planning Policy Framework). **Nor should it be used to constrain the delivery of a strategic site allocated for development in the local plan** or spatial development strategy. Link: https://www.gov.uk/guidance/neighbourhood-planning--2#contents We also advised that it would be helpful if the policy wording was simplified as parts ii and iii repeat policy protection in JLP or elsewhere in the HNP. The JLP policy DEV29 allows some flexibility with development to ensure that a balance can be struck between positive development and protection of green space based on local needs. Currently BG1 is too definitive in relation to green spaces. The strict interpretation of this policy would restrict positive development. Therefore we recommend that the policy wording should be simplified as parts ii and iii repeat policy protection in JLP or elsewhere in the HNP. In addition to be in conformity with in strategic policies for the area particularly Policy 'PLY20 Managing and enhancing Plymouth's waterfront' you should remove the reference to minor development and add an additional clause to ensure that development and public realm measures are used proactively to repair damaged environments, re-use historic buildings and enhance the overall enjoyment of the area by visitors and residents. In conclusion: Maps showing this designation should be clear and consistent. New sites which have been added which have not been assessed and do not fit the criteria for the designation should be removed. Parts ii and iii should be removed from the policy to avoid repetition with other policy in the NP. Policy should follow our suggested wording to align with strategic policy 'PLY20 Managing and enhancing

			Plymouth's waterfront' of the JLP. Suggested wording: i. The following areas and as shown on the Proposals Map (Figure 11) are designated as Local Green Spaces: a) The Hoe (Inc. Armada Way green area by Crowne Plaza) b) Hoe Foreshore c) Land off Madeira Road (Citadel slopes) d) West Hoe Park e) Millbay Park f) Land off Hoe Road (slopes opposite Citadel Rd B&Bs) g) Radford Road (West Hoe Tennis Courts) h) The Mound (Hoe) (Area opposite Citadel gates) ii. Designated Local Green Spaces will be protected and development will only 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) established public footpaths and rights of way will be protected, including access to the water via steps, paths and slipways; f) current primary function of the green space, such as for sports or recreation, would not be lost; g) it would be in keeping with the visual character of the area and/or h) development and public realm measures are used proactively to repair damaged environments, re-use historic buildings and enhance the overall enjoyment of the area by visitors and residents.

Comments from the Public on Policy BG1

Number of comments: 17

Dot Count: 12
(from policy boards at public sessions)



Code	Stance	Comments
BG1-1	Positive	The foreshore does not appear to be shown in green on the map
BG1-2	Neutral	Green space should be left alone! And accessible as far as safe
BG1-3	Positive	Really well thought out and defined. This should protect the valuable green spaces on the Hoe enjoyed by the whole population of Plymouth. Well done.
BG1-4	Positive	I use all of these spaces every day so wholeheartedly support protection of them!
BG1-5	Positive	Agree
BG1-6	Positive	If this plan can provide more protection for our neighbourhood by designating local green spaces, then I'm all for it. I would add a space to the list: the plot of land on the SE corner of Citadel Road and Elliot Street. It would be perfect for a pocket park, perhaps with a tree!
BG1-7	Positive	I wholly support this policy. These green spaces are essential not only because they are an intrinsic part of the Hoe's character, but also because they provide valuable open areas for the wider Plymouth population and visitors to the city to enjoy recreation in a magnificent setting. Green spaces should be protected from inappropriate development.
BG1-8	Positive	I wholly support this policy as these green spaces are an essential part of the Hoe's character. They provide valuable entertainment and relaxation spaces for the whole of Plymouth and visitors alike. These Green spaces should be protected from any development that threatens that character.
BG1-9	Positive	Important to get a good mix on what these areas are used for, an example is once trees and foliage are planted on areas they will never be able to used again for sport recreation, sitting around, walking around.
BG1-10	Positive	Fully support this, those green spaces are important to all who visit and live in the Hoe.

BG1-11	Positive	I support this policy. The policy aligns well with relevant NPPF Policies, in particular Paragraphs 104 & 106 and 108. The policy aligns also with relevant Joint Local Plan Policy, i.e. DEV 27. It might be beneficial to state what is meant by the "provision of essential utility infrastructure" although the following part, i.e. "where the benefit outweighs any harm or loss and it can be demonstrated there are no reasonable alternative sites available" should be adequate to protect against inappropriate utility infrastructure that is not of wider public benefit. Re. Para. 3. ("Where permission for development can be demonstrated to be required, developers will be expected to demonstrate how the existing flora and fauna and any relevant historic feature will be protected or be subject to mitigation measures".) It might be prudent to include a requirement for developments to demonstrate a minimum 10% Biodiversity Net Gain (BNG), to ensure alignment with local and national policy, especially now small developments are now subject to BNG requirements.
BG1-12	Positive	Agree with Policy BG1
BG1-13	Positive	Agree
BG1-14	Positive	Agree with this policy but think that if a green space is to be developed for a valid reason than an an area of equal size and quality should be identified, prior to the development, that can be returned to public 'green space' in order order to retain the existing balance.
BG1-15	Positive	I am pleased to see that this policy sits neatly alongside DEV 27 in the Local Plan, and that it also fits with national planning policy which recognises the importance of green space. I am particularly concerned that all rights of access to the water are retained and enhanced and that the quality of our local green spaces is retained (and enhanced where appropriate).
BG1-16	Positive	I agree with everything mentioned in this policy, it reiterates what national and local policy already setts out but in a succinct and easy to understand way to ensure this is not overlooked on a local level.
BG1-17	Neutral	We are also curious about what might be done to further develop unused, undeveloped spaces within the area. Especially the corner of Citadel Road and Elliot Street.
BG1-18	Positive	….We are also curious about what might be done to further develop unused, undeveloped spaces within the area. Especially the corner of Citadel Road and Elliot Street.

Policy BG2: Protection of Trees, Hedges and Biodiversity

Comments from Organisations

Number of responses: 3

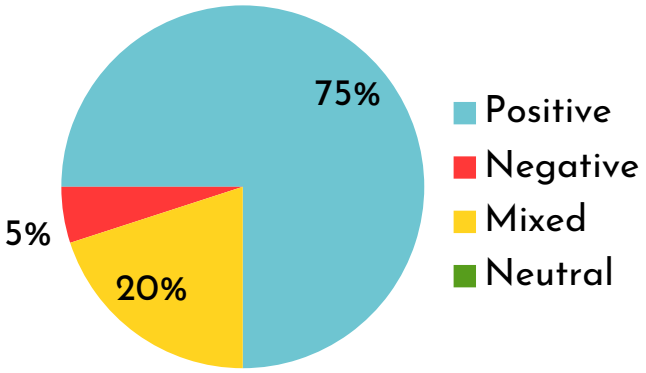
Code	Organisation	Stance	Comments
BG2-EA	Environment Agency SPDC	Neutral	We note the three main policies relating to the environment set out in the plan (BG1, 2 and 3). However, there is no mention within the plan of the opportunities of the (Local Nature Recovery Strategy). It would be prudent to incorporate an intention to align the plan with the LNRS.
BG2-EP	Environment Plymouth	Positive	This is perhaps where the policy can be more of a demand and less of a request in terms of wording as net biodiversity gain should always be considered. a. Does this extend to the blue space ? b. Is there anything in the HNP to deal with animal control? The Hoe used to have a noted rat population but we were never sure which policy controlled the use of poisons in the residential environment. The HNP could include a short policy on removal action that provides the best option in terms of public protection and animal welfare. This policy is welcomed and will need to be referenced back to the PCC Local Nature Plan which is under review.
BG2-PCC	Plymouth City Council Planning Department	Negative	As previously advised in September 2023 we continue to suggest policy is simplified for clarity including the removal of references to JLP policies DEV26 and DEV28 as this can be covered in the supporting text. Currently 10% net gain cannot be achieved for all new development due to the exemptions, so the policy as worded conflicts with national legislation. The HNP cannot require that any Biodiversity Net Gain to be located in HNP area and therefore we recommend that point e is deleted. The legal framework means that developers will have a choice about where to invest in biodiversity credits, which are not even necessarily in the city. The Council will be developing local options with the aim of seeking retention of these investments in the city, but this is not something that the HNP itself can control. We continue to suggest the following wording which would make the policy acceptable:

			i. Development affecting trees, hedges, or habitats will be supported where it demonstrates: 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) new tree-planting or hedge or habitat creation that adheres to the principle of ‘right tree right place’. d) improvement in habitat biodiversity including mammals, birds, and invertebrates.

Comments from the Public on Policy BG2

Number of comments: 20

Dot Count: 12
(from policy boards at public sessions)



Code	Stance	Comments
BG2-1	Positive	areed
BG2-2	Positive	Great that protection for biodiversity will be included. That if trees or hedges are in danger of being removed it cut back This policy will be able to hold sone sway.
BG2-3	Positive	Trees should receive protection – no felling (except safety). More planting good
BG2-4	Positive	Yes.
BG2-5	Positive	All great. I'm interested in how the Hoe Neighbourhood Forum might encourage all stakeholders to take part in your green policies, not just developers, and ideas on how to improve biodiversity in coastal urban and tourist areas. You've already mentioned that the air quality on the Hoe is not good because of cars. I can also imagine sewage isn't helping prospects for coastal rewilding. I'd love to see the forum and residents offer some suggestions for how we can all tackle these issues, and visit the Hoe sustainably.
BG2-6	Negative	Seriously? Plymouth town centre has serious issues to address to arrest it decline and the problem isn't a lack of trees. How about enforcing a ban on cyclists in the city's biggest PEDESTRIAN area.
BG2-7	Positive	Súper important…. What are they thinking by taking down the tress over by Lamphay Street???…. Far better to work around them as they form such a lovely canopy.
BG2-8	Positive	Policies BG2 and BG3 provide additional protection for the Hoe's existing trees, shrubs, and hedges, so I'm for it. I hate to see trees being removed, such as the ones on Notte Street, leaving a more barren and echoing cityscape. If they were not the right kind of trees, why were they not replaced with some that are right for that place? I believe that additional street trees for the Crescent were part of the deal when the student accommodation was built on Notte Street, but no action has been taken there either. We need more trees and shrubs in our neighbourhood!

BG2-9	Positive	I wholly support this policy. Development often seems to regard treatment of trees and biodiversity as an afterthought. This policy demands a more planned approach, which I believe is essential to maintain and improve the natural habitat of the Hoe.
BG2-10	Positive	I support this policy. Treatment of trees and biodiversity is often an afterthought to tick boxes rather than part of the planning decisions.
BG2-11	Mixed	Don't agree with wanting to nearly double the tree canopy . This will make even more dark areas around the hoe, which will then mean we will have to have more artificial lighting to make them safe environments. Leaf fall is a problem already, not cleared and causes paths to be inaccessible . Looking up to the blue sky is just as important .
BG2-12	Positive	All vital for resident and migratory species.
BG2-13	Positive	I fully support this policy, with some minor comments. The policy aligns well with, and is not in any conflict with Joint Local Plan policies DEV 26 and DEV 28. It also aligns well with relevant NPPF policies, i.e. Paragraphs 187 (b) (d); 192 (b)l 193 (a). Perhaps the term 'biodiversity offset' should be changed to 'biodiversity net gain' or 'biodiversity enhancements', which would align better with national policy and legislation (e.g. Environment Act 2021) which is now more ambitious with regard to nature recovery. I particularly support this policy because the Hoe Neighbourhood area/ St Peter and the Waterfront Ward has a very low percentage tree canopy cover (i.e. 5.82%), and is well below the 20% recommended (Rogers & Handley 2017. Plymouth Policy Area - Tree Canopy Cover Assessment). I believe the Woodland Trust recommends 30%. This ward has some of the lowest canopy cover of the whole Plymouth Policy Area. It is therefore important to have strong local policies that require retention of existing healthy trees wherever possible, and replacement of end-of-life trees. The sentence: "Support for improvement in habitat biodiversity, including mammals, birds, and invertebrates" could be improved and perhaps made less ambiguous by the insertion of '..habitat enhancements for..'. i.e.: "Support for improvement in habitat biodiversity, including habitat enhancements for (or 'to benefit') mammals, birds, and invertebrates".
BG2-14	Positive	Agree with Policy BG2
BG2-15	Positive	Agree
BG2-16	Positive	it is important that the whole neighbourhood area ensures any development, property changes or recreational changes respect the bio-diversity and habitats of any animals. Any new planting of bushes, trees or plants should seek to increase bio-diversity. There must be compelling reason if habitat areas are removed and if it is absolutely necessary, then new areas should be planted to offset the loss.

BG2-17	Mixed	Fully support this Policy and would add that areas of 'waste ground', undeveloped (derelect) or fill -in sites identified in the area could be used to increase planting, food cultivation and/or biodiversity this could be on a temporary or permanent basis. There are many examples of this being under taken in other cities.
BG2-18	Mixed	The Plymouth Hoe has rare plants suited for a coastal limestone environment (list below). The slopes leading down from the top of the hoe to the sea has several patches of unmanaged habitat that are well suited for rare plants due to the limited disturbance. Although these areas would form part of the "Hoe Foreshore", there is still a risk that these areas could be developed without notice. Policy BG1 and BG2 could support these areas by including them in future habitat management plans, as well as ensuring events/developments avoid these areas. Rare Hoe plants species list Ivy Broomrape, Plymouth Thistle, Slender Thistle, Bladder Campion, Sea Spleenwort, Brookweed, Plymouth Campion.
BG2-19	Mixed	I agree that all proposals will need to meet national and local Plymouth policy in terms of protection of trees, hedges and biodiversity. Replacement of end-of-life or diseased trees is an important point to add into the plan and something which is overlooked in current legislation and policy and is particularly relevant in an urban setting where landscape planting is more likely to fail/ have a finite lifespan and should be replaced under new proposals. Whilst point 5 biodiversity offsetting is now national legislation (if you mean legally through biodiversity net gain), biodiversity offsetting for developments which can't provide 10% BNG on site is unlikely to be achievable in the majority of cases within the Neighbourhood Plan Area due to the lack of land to do so/ ownership of existing land to be used being difficult to know/ not able to commit to 30+ years management etc. It will be very difficult to get developers to liaise with the LPA regarding management of local green spaces, unless those local green spaces are included in PCC habitat banking vehicle (https://www.oceancitynature.co.uk/), which none of the Hoe ones currently are. I would be concerned that the requirement to do this would be unachievable and stifle development on the Hoe. This point should be reworded to include reference to on-site BNG i.e. within the development area, which is easier to achieve and enforce. National BNG policy does promote doing stuff on site/locally though.
BG2-20	Positive	I am pleased to see that this policy meets the requirements of, and sits alongside DEV 26 and DEV 28 which I feel are strong and important policies within the Local Plan. Any required enhancements or offsetting should be implemented within the Hoe Neighbourhood Plan area to avoid any detrimental biodiversity or landscape impacts to the Conservation Area.

Policy BG3: Protection of Street Trees

Comments from Organisations

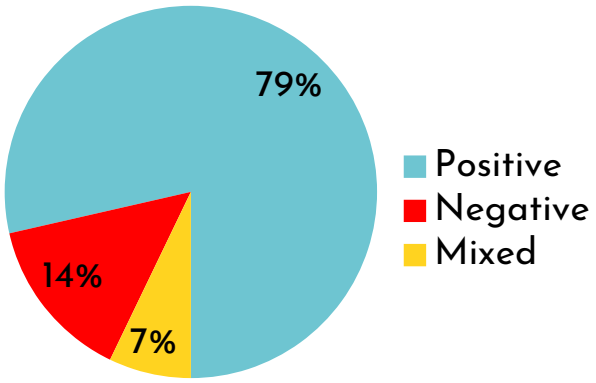
Number of responses: 3

Code	Organisation	Stance	Comments
BG3-EA	Environment Agency SPDC	Neutral	We note the three main policies relating to the environment set out in the plan (BG1, 2 and 3). However, there is no mention within the plan of the opportunities of the (Local Nature Recovery Strategy). It would be prudent to incorporate an intention to align the plan with the LNRS.
BG3-EP	Environment Plymouth	Positive	This policy is welcomed but could be strengthened. a. Would the replacement, introduction and management of street trees be covered by the Council's management strategy ? This would ensure appropriate watering, the maintenance of good tree health and the management of root invasion in built up areas. b. Is there any potential to define which tree species would be most acceptable to avoid the introduction of potentially inappropriate species ? c. Do you dare add anything in to support what might happen if trees require removal ? This policy is welcomed by Environment Plymouth.
BG3-PCC	Plymouth City Council Planning Department	Negative	The Environment Act 2023 introduced a statutory duty that all local authorities need to consult with local residents on the felling of street trees, so it is not entirely clear what this policy is adding that is not already what is covered in legislation. If the policy was to remain, we recommend an amendment to ensure it is consistent and refers to most up to date management principles and therefore reference to 'Plymouth City Council's Tree Management Principles 2019-2024' in part ii. is removed. Suggested wording: i. Where street trees may be adversely affected by the proposed development, the applicant is required to submit a tree survey in accordance with BS 5837. ii. All development that could affect street trees must provide evidence that the tree/s have been assessed in accordance with the most up to date Tree Management Principles. iii. Any potential impacts on street trees should be minimised and mitigated in accordance with these Management Principles.

Comments from the Public on Policy BG3

Number of comments: 14

Dot Count: 10
(from policy boards at public sessions)



Code	Stance	Comments
BG3-1	Positive	agreed
BG3-2	Positive	Yes
BG3-3	Negative	This is crazy. If there is a compelling reason simply replace the trees elsewhere. Don't prevent/hinder essential development. Tail wagging dog is dumb.
BG3-4	Positive	Remove only if absolutely necessary.
BG3-5	Positive	I wholly support this policy. My comment regarding Policy BG2 stands for this policy too – “Development often seems to regard treatment of trees and biodiversity as an afterthought. This is policy demands a more planned approach”
BG3-6	Positive	Similar to BG2 - planners need to start with a thought to trees and biodiversity and then then proposal and not the other way around.
BG3-7	Negative	Taken from the most resent PCC Tree management Principles. 2.2.2. Trees within or adjacent to the public highways PCC as the highways authority under the Highways Act 1980 has to ensure that trees do not interfere with pedestrians or road users. As Highways Authority for the Plymouth, PCC has a duty to maintain the highways infrastructure in a safe and useable condition by removing danger and managing use, as well as minimising disruption caused to traffic by works on the highway. This is not always carried out as quickly as required. I am also concerned now that we have more vehicles on street parking that they are getting damaged by the sap falling from the trees. More chemical cleaning materials are being used to clean the sap off, which could be adversely causing damage to the environment. I am also concerned that the canopy from street trees is increasing and making dark areas for walking safely and again leaf dropping is dangerous to walk on ie slippery .

BG3-8	Positive	Please see my comments for BG2, which are also relevant to this policy - specifically with regard to canopy cover. I fully support this policy. I feel it is reasonable and balanced and aligns with what is expected more widely for development proposals.
BG3-9	Positive	Wholeheartedly agree with Policy BG3
BG3-10	Positive	Agree
BG3-11	Positive	Fully agree with this policy and think that additional planting of street trees should be under taken in the areas identified as being suitable such as service lanes, paths or waste ground, inorder to enhance the environment.
BG3-12	Mixed	Policy BG3, clause 1 relates to trees that are adversely affected by proposed development. This statement could be misconstrued as trees being removed/felled. Tree roots are an important for tree health and developments that require excavation within close proximity of a tree could impact the tree health. I suggest this statement is refined to include developments that require excavation within 10m of a tree require a arboricultural survey to determine a Tree root protection area.
BG3-13	Positive	It is important to minimise any impacts to street trees, which add distinctiveness and character to the Hoe Neighbourhood Area and benefit the health of residents and visitors alike.
BG3-14	Positive	I agree with this policy, especially if trees are already established adjacent to land to be developed. It could be easy to miss the potential for shading these out/excessive trimming of crown for new development as this would not be within the planning red line boundary and therefore not taken account of during the planning process.

Policy PT1: Promoting Sustainable Mobility

Comments from Organisations

Number of responses: 5

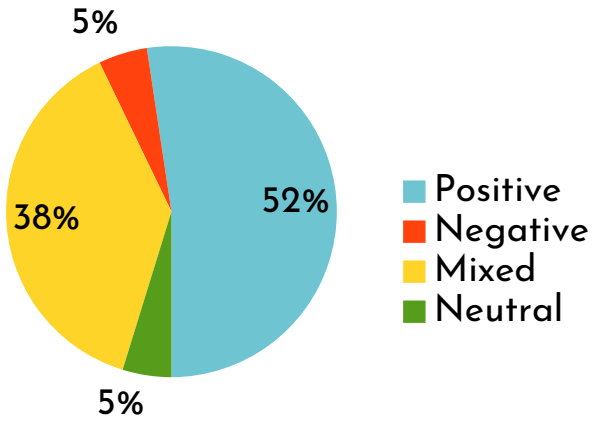
Code	Organisation	Stance	Comments
PT1-CAP	Climate Action Plymouth	Mixed	I would have like to have seen more about pedestrian areas, as well as some areas which are not shared between walkers and cyclists, particularly with the speed and weight of modern assisted cycling. Walking through the Hoe district should be a pleasurable experience and not one constrained by parked cars or by traffic generally. On-road charging of electric vehicles needs particular attention. Roadside public chargers offer one solution but cross-pavement home powered solutions are always preferable to the EV Driver. Many different cross-pavement solutions are now being accepted by many Local Authorities throughout the country. Any public transport entering the historic centre should be a priority for the introduction of battery electric buses. For the businesses that help make the historic centre an attractive destination to visit, care need to be taken with outdoor area canopies, blocking off public access to walking routes and to the foreshore, and to controlling pavement signage/sandwich-boards.
PT1-EP	Environment Plymouth	Positive	This policy would be welcomed.
PT1-NH	National Highways	Neutral	We are interested in the traffic impact of any future development proposal and specifically the impact of growth on the continued safe and efficient operation of the SRN. In respect of traffic and transport, Plan polices should ensure development mitigates its traffic impact on the surrounding network which includes reducing the reliance on the private car by requiring development to both safeguard and improve local facilities, services, and sustainable transport options.
PT1-PCS	Plymouth Civic Society	Negative	Given the central location of the Hoe we do not agree that new developments should include potential provision for parking.
PT1-PCC	Plymouth City Council Planning Department	Negative	We note that the Policy has been moved renumbered and moved ahead of parking policy and that the Travel plan reference has moved to parking policy in this latest version. We are pleased that the minor changes suggested in

			September 2023 have broadly been incorporated into the Draft policy wording however we would still wish to include reference to reducing the use of car and support for zero emission vehicles. Suggested wording: i. New development should be designed to reduce travel by car and support a more sustainable local transport network. Proposals will be supported where they: a) Prioritise walking, cycling, and public transport as the most favoured modes of transport; b) Reduce the use of cars, support zero emission electric vehicles, and / or shared mobility schemes. ii. 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.

Comments from the Public on Policy PT1

Number of comments: 21

Dot Count: 1
(from policy boards at public sessions)



Code	Stance	Comments
PT1-1	Positive	agreed
PT1-2	Mixed	A great plan however I would have loved it if you had advocated and implemented a pedestrianised Hoe front
PT1-3	Mixed	Not covered here - damage to road (potholes, cracking etc) caused by heavy vehicles (e.g. delivery lorries, and fairground vehicles travelling up Athenaeum Street for various events (National Fireworks display, Armed Forces day etc.). Would like to see a policy of charging such vehicles to use the road and immediately diverting the funds back into the road repair/renovation. Although the labour council and government may feel that this is difficult to do for the delivery companies, it could at least be done through adding to the charge for licenses given to companies (fairground etc) for occupying a spot on the Hoe.
PT1-4	Positive	Prioritise walking, cycling, public transport. Car-free streets, OK. Electric charging points, yes.
PT1-5	Positive	I fully support this strategy. However, I wonder if there is something in this document that recognises that wWe need to reduce our dependency on one or more car(s) per household.
PT1-6	Mixed	Whilst supporting this policy in principle, the current public transport schedules fall short of meeting public need. Buses run from 9am with the last bus leaving the city centre at 6pm. On Sundays the service is only hourly. This is not adequte for residents going to work, or for people working in the Forum area.
PT1-7	Positive	OK. I'd have liked to see something about car sharing schemes etc.

PT1-8	Mixed	Just a quick piece of feedback to say: I couldn't see anything on this subject in the policies in The Plan (only in the justification to Policy PT2 - Parking), but as someone who works on the nearby Stonehouse Peninsula and cycles along the hoe most days, I would like to voice my support for any subsequent proposals to pedestrianise The Hoe. This would be subject to the usual exclusions (access for deliveries, Blue Badge holders, buses and, hopefully, bicycle lanes). Supplemented with the parking that seems to happen anyway on the top of The Hoe, this would mean we could enjoy the seafront without the noise and fumes of cars. It would also mean the pavements would be less congested, which is particularly a problem in the summer on Madeira Road. Given that there seems to be so much support for this, I wonder why there is not a Policy laying out a plan for pedestrianisation. Perhaps it is not within the scope of The Plan?
PT1-9	Negative	In Devon cars are essential to getting around (unlike say London). In Plymouth pedestrians should be protected from cyclists who agressively put themselves first, as anyone who has ever spoken to cyclists will know. Cyclists are a tiny but vocal minority who wrongly believe they must have special treatment. Being a pedestrian in Plymouth becomes ever more dangerous with speeding cyclists who have little if any regard for pedestrians. I have lost count of the number of times as a pedestrian I have had near misses with cyclists who rarely cycle on the roads and do not slow down or warn pedestrians. As a driver I see expense cycle lanes invariably empty. Stop wasting the majority's money on anti social cyclists.
PT1-10	Positive	Important, I suppose, but doesn’t affect me. There is sufficient lighting on the Hoe, so I feel safe when walking at all hours.
PT1-11	Positive	I support the plan to promote walking and cycling in the Hoe area, espacially as so many residents and visitors do take walks through our residential neighbourhoods and down on the seafront. A big part of making a place pedestrian and cyclist friendly is making people feel safe from vehicle traffic. While it's not a development issue, per se, I would like to see a 20mph speed limit everywhere in the Hoe Neighbourhood Area, except for Notte Street. There are also several junctions within the area that a dangerous because it is not clear where and when pedestrians have priority, including Hoe Approach at the Citadel Road junction, Lockyer Street at the Citadel Road junction, and Lockyer Street at the Notte Street junction. Given that there are so many pedestrians in our area, more protected crossings (e.g. zebra crossings) in other places would make walking feel safer too. If this cannot be a policy, perhaps it can go on the list of aspirations.
PT1-12	Neutral	Major development proposals should be supported with a traffic plan AND SUITABLE, ADEQUATE PROVISION OF PARKING (which is already difficult)

PT1-13	Positive	I wholly support this policy. The policy recognises that new development needs to acknowledge that the future for mobility needs to be more sustainable. I respect the fact that the policy is pragmatic in recognising that cars will still exist, albeit most likely in electric form.
PT1-14	Positive	In the recent past planners have allowed, even encouraged, new housing or conversions without sufficient parking needs of the occupants. This policy needs to recognising that, whilst public transport and walking cycling are to be encouraged to reduce car movements around The Hoe, residents will still want to own a car by replacing their existing car with an electric one.
PT1-15	Mixed	I strongly believe that the Hoe would be an ideal place for a blanket 20mph speed limit. The main argument against this will be the low number of accidents recorded in the Hoe area (I checked the accident stats). It's many years since I worked in Traffic Management and in those days decisions were based on cost benefit. Every accident had an associated cost weather it was a death or a minor injury and this was weighed up against the cost of implementing the scheme. Due to the road layout of the Hoe it is reasonable to assume that there is little through traffic and that most traffic originates or terminates in the Hoe area. The extra time of travel by a 20mph limit would be minimal and measures in seconds rather than minutes. I would hope that in this enlightened age there would be a way to factor the gain of overall community amenity from slower traffic flow and that a 20mph speed could be factored into the plan.
PT1-16	Mixed	More homes, less parking conundrum Ice cream vans noisy and polluting Perhaps Look II would be a good place to site a board listing all the famous comings and goings in and out of Plymouth Sound
PT1-17	Positive	Would like to see a trial of on August Sundays the closing to traffic along Madeira Road along the section beneath the Citadel which would enliven both footfall and therefore commercial opportunities within framework of the Neighbourhood Plan. Therefore wholeheartedly agree with Policy PT1
PT1-18	Mixed	Mixed views on this, but leaning more on the Positive side as sustainable transport is vital. It also needs to be affordable. My mixed view comes from witnessing the misuse of electric bikes being ridden often recklessly along the Barbican. Particularly those delivering food (Deliveroo as an example). Cyclists ignoring the Highway Code. And also seeing Beryl Bikes on numerous occasions and locations abandoned. Better/clearer signage needs to be considered instructing cyclists to dismount where appropriate, and adhere to one way road signs. More electric charging points are welcomed.

PT1-19	Positive	It is important that we move towards more electric vehicles but the siting of charging points needs to be carefully planned. There are a large number of apartments in the area and thus individuals cannot have a charging point on their driveway, therefore they need to be on the street/pavements. There were numerous charging points fitted a few years go which were on the pavement but were stored underground. Access to the charger brought them to the surface but when the battery was charged the machinery disappeared underground again. This was an ideal design but I understand there were technical issues and they were removed. Perhaps the council could look into a similar scheme. At present there are very few on street chargers. A couple outside Ballard House and one now installed on Cliff Road but this is never going to be sufficient.
PT1-20	Positive	This is a very important policy which I hope will remain in the Plan - word for word. It will be hugely beneficial to our area, where it is perhaps easier for residents not to use cars than it might be in some other parts of the city. Mobility hubs and charging points will address pollution and noise issues. It makes sense for walking and cycling to be a priority, with the city centre, bus station, rail station and waterfront all within walking distance/ easy cycling distance.
PT1-21	Mixed	Transport : I hope they won't reduce the service or the 25 bus as it is invaluable and will become more so as time goes on. How great to see so many green Beryl bikes!

Policy PT2: Parking

Comments from Organisations

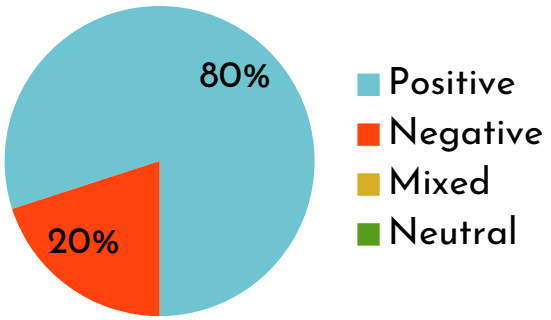
Number of responses: 2

Code	Organisation	Stance	Comments
PT2-EP	Environment Plymouth	Positive	Given the possible lack of space for future parking need, this policies needs to ensure that future plans provide for all options including access to charging points (not always available in pre-developed areas) and proxiity to viable bus routes and accessible facilities. Is it possible for the HNP to identify these needs in its policies and to support the low carbon transport demands identified elsewhere ? Environment Plymouth feels that this policy could be extended and strengthened to support sustainable transport plans. It is acknowledged that some cross referencing with existing PCC policies and plans may be needed but if both parties are committed to this issue they will need their policies to reflect similar aspirations. Has the HNP considered what it might suggest for existing parking sites (both for residents and visitors) where sites are likely to be lost to development ?
PT2-PCC	Plymouth City Council Planning Department	Negative	We note that the Policy number changed to reflect position in document and that the Travel Plan clause is now in this policy rather than in the one covering sustainable mobility. We are pleased that some of the minor changes suggested in September 2023 have been incorporated into the Draft policy wording however we still think it is important to reference car free development in this sustainable location. Suggested wording: i. Where appropriate development proposals for new dwellings should provide sufficient parking to meet and manage demand in order to protect residential amenity and ensure safety of the highway network. ii. Where appropriate development proposals should be supported with a travel plan. iii. iii. Car-free development can be acceptable as a way of supporting the transition towards a low carbon/emissions transport future. Proposals which creatively respond to the complex challenge of managing parking demand and addressing climate change will be supported.

Comments from the Public on Policy PT2

Number of comments: 15

Dot Count: 8
(from policy boards at public sessions)



Code	Stance	Comments
PT2-1	Positive	I think this needs more work/ideas - it's quite a problem and I'm not sure these policies address the issue - having said that I can't think of anything specific.
PT2-2	Positive	The nature of residential development in the Forum area has encouraged people in an older demographic, who may have or may expect to develop, mobility problems. Policies which seek to discourage use of vehicles by lack of adequate parking provision are in effect discriminatory.
PT2-3	Positive	Ah, I see. The shared mobility scheme is brought in here. This could help enormously with parking but also with community cohesion.
PT2-4	Positive	Could I suggest with 1. - "new dwellings" - you might want to include businesses and organisations moving into the area? Do you have problems with AIRBNB parking? will your transport policy coordinate with issues around the rest of the city, in particular the Barbican area where cars accessing parking are coming through the Hoe. Are developments in nearby regions affecting parking in the Hoe area? Is there any way of improving transport links for events on the Hoe so we can reduce the number of cars?
PT2-5	Negative	Making life difficult for motorists ie the majority will have zero effect on the climate. It will make Plymouth less attractive for businesses, residents and visitors. Stop spending residents money on virtue signalling.
PT2-6	Positive	Agreed. I rarely use my car, but sufficient parking is important.
PT2-7	Negative	Last year I reported Lockyer Street with speeding vehicles, I feel nothing was looked into. We still have young mothers walking their children to school, and elderly people trying to cross this road, not long and someone maybe injured or killed. Speed ramps would work.
PT2-8	Positive	I wholly support this policy. The policy recognises that developers and planners cannot simply assume that city dwellers are always going to be car free. Failure to acknowledge this in the past has resulted in an ever-increasing pressure on existing parking. This policy addresses the issue well.

PT2-9	Positive	As I stated in my response to PT1, residents will still own cars and will simply be swapping petrol/diesel for electric and this needs to be factored into development plans. As much off street parking, with charging points, should be provided to meet a new developments needs. This will allow on-street parking/charging for existing residents that do not have access to off street parking.
PT2-10	Positive	Important not to loose Parking bays.
PT2-11	Positive	Agree with Policy PT2
PT2-12	Positive	I agree that new developments need to factor in adequate parking for those residing in said dwellings.
PT2-13	Positive	I am particularly happy to see that this policy includes innovative solutions (to both climate change, parking issues and car ownership affordability), i.e. shared mobility schemes. I have recently joined the Co Wheels scheme and would very much value having a Co Wheels car close to where I live. I currently have to walk 20 minutes.
PT2-14	Negative	Fourth para, last line. I do not think that ‘Forum Members’, by definition more actively interested than the majority of local residents, can be equated with ‘the local community’.

PT2-15	Positive	Hi everyone, We're [redacted] and we feel very honoured to have had the opportunity to support our community of ice cream lovers- from our PCC rented site on Hoe road location (next to pier one restaurant) over the past 6 years. As 'the Ice Cream Van on The Hoe' we're thrilled to see a proposal that aligns so beautifully with our own long standing ambitions with creating a greener, cleaner, and safer environment for our community. As part of your well thought out and vital future plans, we would absolutely love the opportunity to access an electric hook-up for our ice cream van. This would enable us to operate with our engine off, significantly reducing noise and fumes. Imagine enjoying your ice cream with just the sound of waves and laughter—bliss! We were so close to making this a reality this year with PCC's support and funding.... we even had the road dug up and a power box cited for us…but alas the project fell apart at the eleventh hour- we were so upset!…particularly considering our £3000 investment in an electric motor drive to operate our whippy machine so the engine can be turned off. We would love any opportunity to discuss and support how this infrastructure change can be supported for all the ice cream sites along the Hoe- so not only would this make The Hoe a more peaceful and enjoyable space for everyone, but it also reflects a shared commitment to sustainability and protecting our environment for future generations. So we see it as a win-win for both local businesses and the planet. We're eager to be part of this positive change and would greatly appreciate the group's support to help us make this transition. Thank you for considering us in this proposal—we're excited to be part of the journey toward a greener future for the Hoe Warm regards, [redacted] (The Ice Cream Van on The Hoe)

Policy HS1: Housing Mix, Accessibility and Environmental Standard

Comments from Organisations

Number of responses: 3

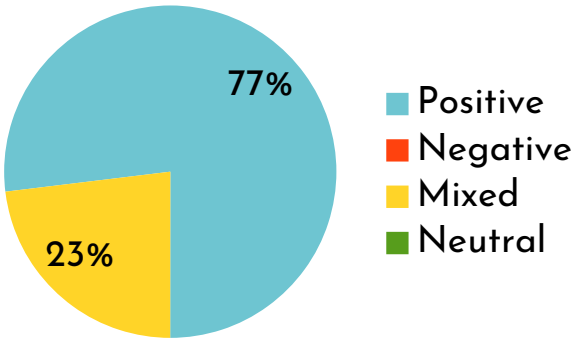
Code	Organisation	Stance	Comments
HS1-EP	Environment Plymouth	Mixed	The key aspiration of this policy needs to be the ability of the HNP to reflect what is included in the Local Plan as, technically, that's what developers will be held to. It could be that this policy replicates much of this. Otherwise it is difficult for EP to comment on this. In terms of environmental standards it would be useful for this policy to link back to those referring to energy efficiency and low carbon ratings as described in previous sections. Environment Plymouth would welcome guidance on the environmental standards expected but it may be difficult to be too demanding. The solution would be to ensure that the HNP reflects and enhances what is already included in other PCC policies in terms of energy efficiency, building products and design.
HS1-HE	Historic England	Neutral	The most common way that risk of harm emerges in Neighbourhood Plans is when new, site-specific allocations for development are being made. Where a neighbourhood plan recommends a site to be allocated for development, there is a risk that heritage assets may be harmed as a result of that development. We note that the draft Neighbourhood Plan does recognise two specific site allocations for housing-led, mixed-use development. However, we also note these allocations have already been made within the Local Plan itself; therefore, such allocations have already been rigorously considered with respect to their impact on heritage assets. So, we assume that there would be little need to revisit the environmental impacts in the context of the emerging Neighbourhood Plan.
HS1-PCC	Plymouth City Council Planning Department	Negative	We are pleased to note that our recommendation to remove reference to Future Homes Standard has been done. The policy text also sets out that development proposals must refer to the tenure needs of the Hoe Housing Needs Assessment and whilst this adds a level of detail to the area as already stated in the justification for the policy that ‘ the Hoe Neighbourhood Area is a neighbourhood within a city. Housing issues in the Hoe Neighbourhood Area are therefore inextricably linked to

			factors in Plymouth's wider housing and hospitality markets'. Given the links with the wider Plymouth housing needs reference to the Hoe HNA should be removed from the policy. However as per advice given in September 2023, we highlighted that to be in line with Planning Practice Guidance that policy wording should be concise, precise and supported by appropriate evidence we recommend that the policy should be rewritten to avoid repetition and to increase clarity. As written part iii. does not consider viability issues, while iv and v referring to the needs of both older and younger families can be combined into part ii. Suggested Wording: Policy HS1 – Housing mix and accessibility i. Proposals for more than five dwellings should demonstrate how the applicant has sought to meet locally assessed tenure needs ii. Proposals for a mix of housing sizes and which seeks to provide suitably designed homes for families and older people will be supported. iii. Proposals for the conversion of flats back to family homes will be supported. iv. Proposals that exceed the "Accessible and Adaptable Dwellings" in the Building Regulations Part M4(2), in order to meet the lifetime needs of residents will be supported. Also: p.63 The statement that the Plymouth City Council document 'Plan for Homes' allocates sites is incorrect. This document does not set planning policy and does not identify any sites.

Comments from the Public on Policy HS1

Number of comments: 13

Dot Count: 3
(from policy boards at public sessions)



Code	Stance	Comments
HS1-1	Positive	4. To address the needs of younger families… what are examples of 'housing specifically designed to address their needs'?
HS1-2	Mixed	No new housing in this area – only social – family housing
HS1-3	Positive	Additionally I recommend that criteria for planning permission for houses of multiple occupation are reviewed for the Forum area. The basis is calculated as a percentage of exisiting dwellings, but because of the high proportion of flats, such applications are virtually guaranteed acceptance, and so circumvent the intention to protect residential areas.
HS1-4	Positive	Great that the Forum has its own commissioned Housing Survey. Good work and some precise and sensible points made here.
HS1-5	Positive	I don't understand why 'five'? Why not all proposals? Have you a policy on AirBnB? Also converting old BnBs into houses?
HS1-6	Positive	Agree with all of this. Important to have diversity here, although the nature of the current buildings on the Hoe does limit this as only quite large houses and flats.
HS1-7	Positive	Proposals should include designated infrastructure to support the changing demographics and health: education/ social/ welfare needs
HS1-8	Positive	I wholly support this policy. Without referencing the housing needs of the area, there is a danger that development will make the housing mix unbalanced.
HS1-9	Positive	Wholeheartedly agree to Policy HS1
HS1-10	Positive	Agree. Consideration needs to be given for the provision for more family homes, to restore and develop a better community. A good mix will foster a more vibrant feel to the areas and feed the businesses in the area, so they aren't relying on trade from visitors so much. The Lido and National Marine Park will benefit from more families living in that area.

HS1-11	Positive	It is important to address housing needs of young families within the area and also to provide sheltered housing for the elderly. I like the ambition of this policy in its consideration of the various needs of all residents and would-be residents.
HS1-12	Mixed	Policy HS1, third para down p.58. “In terms of existing housing stock…” . I regret that I had to read this paragraph several times before I was sure in understood what it was trying to say! I think that this para would benefit from a re-write.
HS1-13	Mixed	As well as addressing the needs of younger families, older people, and the provision of sheltered accommodation, have we included accommodation for singles?

Policy HS2: Housing Site, former Register Office

Comments from Organisations

Number of responses: 5

Code	Organisation	Stance	Comments
HS2-EA	Environment Agency SPDC	Mixed	There is a mention of the Critical Drainage Area within the plan, and you may seek to incorporate specific requirements on the management of surface water on the allocated site (HS2 / PLY27). This would link into the intention of the plan to adapt to climate change. On the matter of water quality, the plan doesn't specifically mention the presence of bathing water designations. You may want to highlight and note the importance to avoid adversely impacting the designations through any marine or terrestrial development.
HS2-EP	Environment Plymouth	Mixed	I am not sure to what extent the HNP will influence the proposals of the developer who has purchased this site and it is clearly already a controversial issue. Much will depend on the extent to which the developer works with the community. In general we support the proposals laid out in the policy but, at this stage, it is difficult to say how this will be applied. Given that there are other potential development sites in the area it may seem odd that one site in particular is given so much space in the HNP ....was this the intention ? If not, it might be worth reviewing what is proposed by this policy and to ensure that it does not conflict completely with the Council's plans for the site. In the circumstances we suspect some compromise may be needed.
HS2-HE	Historic England	Neutral	The most common way that risk of harm emerges in Neighbourhood Plans is when new, site-specific allocations for development are being made. Where a neighbourhood plan recommends a site to be allocated for development, there is a risk that heritage assets may be harmed as a result of that development. We note that the draft Neighbourhood Plan does recognise two specific site allocations for housing-led, mixed-use development. However, we also note these allocations have already been made within the Local Plan itself; therefore, such allocations have already been rigorously considered with respect to their impact on heritage assets. So, we assume that there would be little need to revisit the environmental impacts in the context of the emerging Neighbourhood Plan.

HS2-PAT	Plymouth Architectural Trust	Positive	The Plymouth Architectural Trust strongly supports this policy.
HS2-PCC	Plymouth City Council Planning Department	Negative	As previously advised in September 2023 we recommend that you delete this policy. The Planning Practice Guidance – Neighbourhood planning (Paragraph: 044 Reference ID: 41-044-20190509) states that: 'The resulting draft neighbourhood plan must meet the basic conditions if it is to proceed. National planning policy states that it should support the strategic development needs set out in strategic policies for the area, plan positively to support local development and should not promote less development than set out in the strategic policies (see paragraph 13 and paragraph 29 of the National Planning Policy Framework). Nor should it be used to constrain the delivery of a strategic site allocated for development in the local plan or spatial development strategy.' Whilst the Neighbourhood Forum have included elements of the adopted JLP strategic Policy PLY27 such as active frontages and the relationship with area the removal of a quality hotel, reduction of homes, and the inclusion of a community space, possible retention of registry office role and a restriction of height means this policy is fundamentally not in 'broad conformity with the JLP' and as such we object to this policy. It conflicts with the PLY27 policy provision to maximise the site's redevelopment potential and the site's role as a strategic gateway to Armada Way. This is major opportunity site in a key position and Policy HS2 would prevent the site from reaching its potential. Policy HS2 seeks to reduce the number of homes from in the order of 52 as set out in PLY27 to in the order of 38, but we do not consider this desirable or justifiable. The evidence reports in support of the viability and mix of development were carried out carried out more than 2.5 years ago and it is widely understood that construction costs have increased rapidly since that time (over and above the increase in sales values). This casts doubt on the conclusions in the summary- that various development scenarios including a 50% affordable housing option would be viable without public subsidy. Evidence from across the city suggests that there have been no policy compliant (at least 30% AH) major planning applications in the city for many years without

			public subsidy, and we have no reason to believe that this site would be any different. All viability scenarios rely on the release of the land for £1. Given that the site has recently been sold to a private owner for almost £900k, the local planning authority cannot envisage how it would be possible to acquire the site on that basis. In our opinion this casts further doubt on the conclusions of the viability reports which are now outdated and seriously over optimistic in terms of development viability in current market conditions. Our Economic Development team have confirmed that there is still evidence of need for new hotel space in the city and therefore this would possibly preclude any change in policy within the JLP review. We object to the policy prescribing specific building heights. The Forum argued for a restriction on the building height at the at the JLP inquiry however the JLP inspectors having heard all the evidence did not uphold this request. The wording in this Neighbourhood Plan Policy would compromise optimum redevelopment potential of this important opportunity site. The justification text lists a number of documents and states 'Collectively, these documents indicate the site has always been, and still is, outside designated zones of opportunity for tall buildings' however there is currently no designated zone for tall buildings in the JLP. We agree that building heights should respect the Hoe's special character and the scale of the buildings, streets and spaces that make a positive contribution to its townscape, but cannot support setting prescriptive storey heights. Building floor-to-ceiling heights vary of course, including in relation to different use types and mixes of uses and it is important that the policy allows flexibility. Policy HS2 requires specific building materials and we question the prescriptiveness and appropriateness of this – in particular, we would question the suggestion that render would be appropriate – it is characteristic of the area, but many recently completed local developments have suffered from severe render staining, prompting much public interest and complaint. JLP Policy PLY27 requires improved east/west public access along the site's north boundary, but Policy HS2 only requires retention of the existing footpath here. This would be a major missed opportunity.

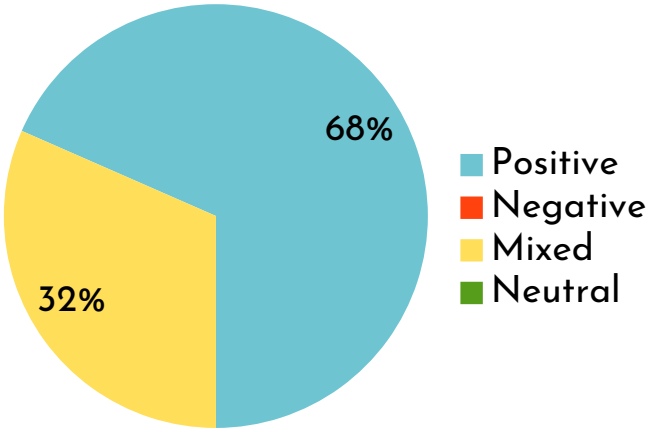
			We note that no Hoe Neighbourhood Plan policy is proposed for Policy PLY28 (Land north of Cliff Road, The Hoe) and we would therefore question whether a policy is required for this site. Our recommendation is that the Policy HS2 is deleted. PLY27 already requires the design of development to be informed by a detailed heritage character assessment and to conserve and where appropriate enhance the character or appearance of the Hoe Conservation Area and Registered Park and Garden. PLY27 as drafted has sufficient flexibility to allow for community uses as part of its active ground floor frontage provision. It is also telling that an AECOM an independent advisor to the Forum reviewed the emerging draft policies in May 2021 and concluded that the policy wording which at that stage did not set out a reduction in the number of dwellings was 'not in conformity with the basic conditions because elements restate Local Plan policy and not all of the requirements are appropriate in terms of conformity with the local plan'. They also recommended at this stage that reference to the register office be deleted because PCC has already relocated the Register Office. The report concluded that 'It is valuable to have a Neighbourhood Plan policy specific to this site, but it should not restate some Local Plan requirements and conflict with others- as worded, the policy would fail the Basic Conditions and be deleted'. The revised NPPF (December 2024) proposes a new standard method for assessing housing needs which would significantly increase the requirement for new homes within the city and would require each existing site and new sites to maximise their housing potential rather than reducing it as this policy wording does. Paragraph 044 of Government Guidance on Neighbourhood Planning states: The resulting draft neighbourhood plan must meet the basic conditions if it is to proceed. National planning policy states that it should support the strategic development needs set out in strategic policies for the area, plan positively to support local development and should not promote less development than set out in the strategic policies (see paragraph 13 and paragraph 30 of the National Planning Policy Framework). Nor should it be used to constrain the delivery of a strategic site

			allocated for development in the local plan or spatial development strategy. Link: https://www.gov.uk/guidance/neighbourhood-planning--2#contents Ongoing advice from both your independent advisor and us has been that this policy clearly in not in conformity with the adopted JLP Policy PLY27 in addition there has been no evidence supplied which would demonstrate that there have been significant changes since the Local Plan examination that would warrant a change in approach. Only a neighbourhood plan that meets the 'basic conditions' can be put to a referendum, therefore we reiterate that our ongoing advice that this policy be deleted.

Comments from the Public on Policy HS2

Number of comments: 19

Dot Count: 4
(from policy boards at public sessions)



Code	Stance	Comments
HS2-1	Positive	Can these aspirations be applied to any future development of the site as it has now been purchased?
HS2-2	Positive	I consider the whole plan for the register office to be outrageous. Including selling it. So it's brilliant to see that there is a whole ping in place in this plan. To help secure a plan that is the best for the building.
HS2-3	Mixed	I welcome the redevelopment of this current eyesore, and the effort to limit size and height of any new building. However, I feel 6 stories above ground and 38 units would be too much for local infrastructure, health services and parking. I think this policy is a very good compromise that looks at all issues with redevelopment of the site.
HS2-4	Positive	This is such a sad loss to plymouth as it was amazing that people could get married with those beautiful surroundings. It would be horrid to see something horrid, ugly and commercial in its place. Brilliant it's included in the hoe forum plan and I agree it needs to be the best possible building for the people.
HS2-5	Positive	This location is on the main pedestrian access route to Plymouth Hoe park. The need for careful consideration of any planning application cannot be stressed too highly. Developement of Plymouth's tourist industry is a vital part of the economic mix for the City, and visitors from both the UK and overseas are focussing on this heritage site.
HS2-6	Positive	I know the Forum has done a lot of work on this and it shows in the detail and confidence of this policy. I have been involved in some of this and know how professional and consultative the planning has been (see appendices). This is absolutely right for the site and needs to be agreed within this plan and used to shape any development that the new owner of the site has in mind. It will be a huge benefit to that developer to have had so much groundwork covered and to have the support of the local community.
HS2-7	Positive	I am very concerned about the redevelopment of this area and hope the planning officers are extremely careful with what they permit!

HS2-8	Mixed	While the objectives are all entirely reasonable, from a complete laymans point of view it doesn't seem possible to achieve them all within this site..
HS2-9	Positive	I know the register office site has been sold now, but I hope it is not too late to have a say in what goes there next. Policy HS2 puts some sensible guidance in place about what should be built there. I would support the development of low-density, affordable housing on the site, and I loved the design proposed in the feasibility study. We need more space for families on the Hoe, and some three-bedroomed houses or apartments would be welcome here.
HS2-10	Positive	The Hoe area needs to have a balance of housing to avoid it becoming too specific to one type of resident. At present profit takes too much of a priority against a balance of housing leading to ever smaller dwellings with houses that could be converted into two large dwellings being converted into six or more small dwellings. This Development site is in a prime location and requires that the priority is for the right size and design appropriate to the central site and not another in appropriate tall box of small flats.
HS2-11	Positive	I wholly support this policy. This is a landmark site in a prime location on the Hoe. Development of the site requires a very sensitive approach which respects the historic nature of its housing and park surroundings. Due to its prominent central location, overdevelopment of the site with a tall building would have a detrimental impact in this sensitive area. This policy acknowledges the aforementioned items.
HS2-12	Mixed	Further debate required on this particular site. Many sites are falsely labelled as a Landmarks Site but this one truly is and needs to be right for all of its users. Residents businesses and visitors alike on this major visual landmark. Last chance saloon. Will listen to wiser minds than mine but this one needs to be right. Properly right.
HS2-13	Mixed	I was disappointed to see the closure of the Registry Office. It did support the hotels and venues in the city, and allowed many couples to have pictures taken of their special days on the Hoe. The need for affordable housing though is paramount, so I would rather see this site given to that development and the Quality Hotel site given to development of a hotel to boost our tourism, and support our conference, meetings and events business.
HS2-14	Positive	Agree with this policy but suggest that as the site is at the higher up the natural slope the height of the redevelopment should be limited to that of the adjacent Lockeyer Street villas so that a visual congruity can be maintained.

HS2-15	Mixed	Whilst I agree that development on the former Register Office should aim for excellence and something that benefits the community, finding a developer that is willing to do all the above (or has the money to do so) will be difficult and something I am skeptical the LPA will accept or enforce. To leave the site derelict (and a hotspot of antisocial behaviour) because it does not meet all the requirements above will also not benefit the community. Therefore the Neighbourhood Plan should aim to take a more pragmatic view to any proposed development, or alternatively keep what is already included in the policy but be aware that no developer will aim to do all the things listed above and to therefore accept a development which is not exactly what is set out above.
HS2-16	Positive	This policy is very well thought through. I would like to live in this development! I think this policy strikes a harmonious balance between commercial viability; innovation (e.g. versatile and flexible community space); sustainability (e.g. features such as green roofs, cycle storage; retention of trees as much as possible); and provision of much-needed affordable homes - fitting in sensitively within its setting within the Conservation Area.
HS2-17	Positive	I fully support this important policy. This is a special site, and this policy recognises this and proposes the most appropriate outcomes for the site. 38 new homes seems a lot for this site, but if they are developed sensitively, as this policy guides towards, it would be of huge benefit to the area and local community to have affordable homes here. The scale, including the maximum proposed height seems appropriate. Anything in excess of this would compromise the immediate setting and the wider Conservation Area. Because this site is adjacent to the main access point to the Hoe from the city centre, it is of utmost importance to ensure any development here is sensitive to its surroundings and the heritage and amenity value of the Hoe. An insensitive development here could set a precedent which could eventually lead to the loss of the Hoe's distinctive character. Retaining the mature trees on Lockyer Street will be of benefit to both any new development and existing neighbouring residences and businesses (which would be negatively impacted by their loss). Retention of existing mature trees on site where possible, would align with Joint Local Plan policy DEV 28 and adhere to TDAG best practice guidance principles 'Trees in the Townscape' (TDAG 2012).
HS2-18	Positive	...yes, I agree and happy with all of it (the plan). Especially with the Registry Office part been kept in. So a big thumbs up with the plan from me.
HS2-19	Mixed	HS2 Housing Site at the Former Register Office. Again, I have no knowledge or experience in this field but 38 new homes means 38 parking spaces (probably underground) which will add to congestion at certain times. This is probably not relevant but are we ever informed when the Defence Infrastructure Organisation, part of the MoD, sells off its buildings in order to free up cash? Although it does not fall within the jurisdiction of The Hoe, I see that the Stonehouse Barracks were due to close in 2027 and then redeveloped. The 29 Commandos will leave The Citadel in 2035 which it leases from the Crown.

Policy DC1: Developer Contributions

Comments from Organisations

Number of responses: 2

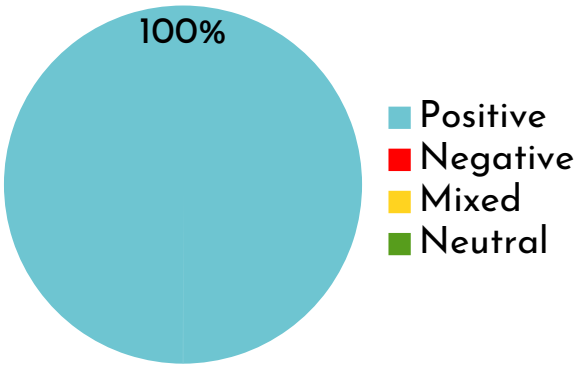
Code	Organisation	Stance	Comments
DC1-EP	Environment Plymouth	Mixed	Whilst welcomed we suggest the wording of this policy is separated as it seems to cover two issues (a) what is done with developer contributions (which is welcomed) and (b) the sort of benefits expected. We would suggest strengthening the wording in terms of the transparency and use of the S106 monies as PCC have not always been forthcoming with this. The HNP is in a good position to set out what it expected in terms of community based spending as a result of develop contributions and this is especially important where the funds are clearly intended for specific use. Then, the wording about access etc can be included in a section about what the preferred community uses would be bearing in mind that this may be very different according to the site and the developers. Ensure that you have reviewed the Council's existing approach (and wording) on S106 spend (they may not welcome this) and ensure that the HNP wording strengthens it...making it very difficult for PCC to use it for any other purpose.
DC1-PCC	Plymouth City Council Planning Department	Negative	A Neighbourhood Plan has no jurisdiction over how the City Council manages infrastructure contributions secured through the Community Infrastructure Levy, nor can it require a development to make a CIL payment. This is governed by the Community Infrastructure Levy Regulations 2010 (as amended). The inclusion in the policy of references to the CIL in this way is both confusing and misleading. However, a Neighbourhood Plan can play a useful role in highlighting specific infrastructure deficiencies that the community would wish to see addressed through Section 106 negotiations. As a result our recommendations are that the policy should be deleted for the reasons set out below DC1 (i) should be deleted. DC1 (ii) should be: deleted, or; amended to provide local context, without being prescriptive, to the negotiation of planning obligations (removing all reference to CIL). DC1 (ii) a) should be deleted as policy but could be

			included in a list of infrastructure priorities relevant to negotiation of planning obligations. DC1 (ii) b) should be: deleted, or; put into a separate planning policy related to the applications that include the creation of movement routes. DC1 (ii) c) should be deleted as policy but could be included in a list of infrastructure priorities relevant to negotiation of planning obligations. Should you wish to retain reference priorities for infrastructure projects, we advise that this is done as a Neighbourhood aspiration rather than a policy.

Comments from the Public on Policy DC1

Number of comments: 11

Dot Count: 3
(from policy boards at public sessions)



Code	Stance	Comments
DC1-1	Positive	Very important
DC1-2	Positive	Maximum social awareness; financial contributions must be part of all development
DC1-3	Positive	Clear and sensible.
DC1-4	Positive	Well thought out, but I am personally happy with what is here now.
DC1-5	Positive	I support policy DC1. Development can bring many benefits to an area, particularly to retail businesses. However, it also puts more pressure on the area's infrastructure and affects the people who already live and work there. Whether it's crowded parks, not enough play equipment, more traffic, less parking, fewer available medical appointments, or a longer queue at the post office, development has an impact. Therefore the money paid by developers to mitigate the effects of their development should go to the place they are affecting.
DC1-6	Positive	I wholly support this policy. It is wholly right that CIL in respect of mitigation against the impact of development should benefit the Hoe in the specific areas identified.
DC1-7	Positive	I fully support this policy which aligns with policy and guidance already in place in the Plymouth area, for example the Recreation Mitigation and Management Scheme for the Plymouth Sound and Estuaries European Marine Site. The policy demonstrates inclusivity, and aligns well with NPPF policies to promote healthy and safe communities (NPPF Chapter 8, Dec. 2024). It aligns well with Plymouth City Council's ambitions to "develop a network of cycle routes so that cyclists can travel safely across the city" and aspirations within the Joint Local Plan. It aligns well with relevant NPPF Policy - i,e, 109 {e}; 111 {d}.
DC1-8	Positive	Agree with Policy DC1

DC1-9	Positive	It is vital that CIL money be used to enhance amenities within the general area of impact, and not be directed elsewhere. Funding for projects within the neighbourhood cannot always be of high priority in the council's budget, yet this area is important to the leisure and tourist economy. Existing footpaths must be protected, and opportunity sought to integrate connectivity in any new developement.
DC1-10	Positive	Fully support this Policy and see this as prefectly fitting the purpose of Section 106 Agreement and the Community Infrastructure Levy (CIL) . It is fair and right that the local community who may be impacted by a development should benefit from improvements in the ifrafastructure in the area. The Hoe Neighbourhood Forum have been given a mandate by the Hoe community to play a pivotal role in these decisions.
DC1-11	Positive	It would be beneficial, given the distinctiveness of, and the overall importance to the city of the Hoe Neighbourhood Plan area, to allocate developer contributions to projects and opportunities within the area itself.

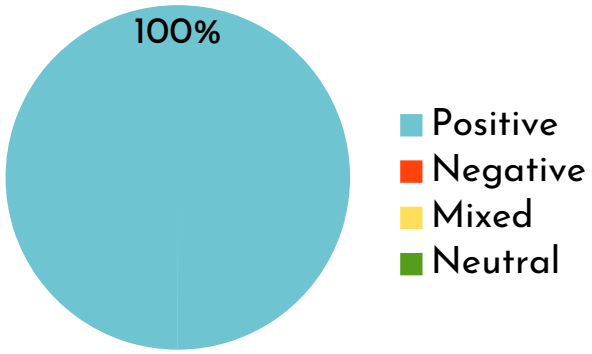
Section 6: Implementation and Monitoring

Comments from Organisations

Number of responses: None

Comments from the Public on Section 6

Number of comments: 7



Code	Stance	Comments
S6-1	Positive	Agreed
S6-2	Positive	Fair outline of monitoring. I think the Community Aspirations are important and need to be put in a format where they can be actioned by the community. No doubt this will follow.
S6-3	Positive	All good… important to monitor and review
S6-4	Positive	This is the time to thank all concerned that have put this all together and thank all who have contributed.
S6-5	Positive	Fully support this policy, the whole process of assessment and review should be transparent and widely available to ALL parties without exception.
S6-6	Positive	A general comment about the Hoe Neighborhood Plan as a whole, I am concerned that developers will not know of it's existence or the existence of other relevant documents i.e. Design Guidelines for Plymouth Hoe as these are not easy to find on google (I tried), not signposted towards by the LPA nor referred to by the HNF during planning responses. These documents could have a wider reach if they are published on the LPAs website/ planning validation guidance etc. which are regularly referred to by various design teams when putting together a planning application to avoid being overlooked. There is a wealth of information here which has been well researched and put together, just no developer ever reads it.
S6-7	Positive	I have reviewed and support the plan and thank the teams for pulling together such a comprehensive and constructive document. In my view, the plan provides sufficient detail to monitor and manage The Hoe neighbourhood (village) so that this special place is protected for future generations. I support the idea of regular reviews and I would hope that any proposed changes in the area are in accordance with the plan, that the plan is not diluted in time and that governance is effective, transparent and equitable.

Basic Conditions Statement

Plymouth City Council's Comments:

The basic conditions statement must set out the neighbourhood plan meets the requirements of each basic condition and other legal tests.

There are five basic conditions that are relevant to a neighbourhood plan. These are:

1 having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan
2 the 'making' of the neighbourhood plan contributes to the achievement of sustainable development
3 the 'making' of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area)
4 the 'making' of the neighbourhood plan does not breach, and is otherwise compatible with EU obligations
5 prescribed conditions are met in relation to the neighbourhood plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan

In addition further advice is set out in The Planning Practice Guidance – Neighbourhood planning (Paragraph: 044 Reference ID: 41-044-20190509) which states that:

'The resulting draft neighbourhood plan must meet the basic conditions if it is to proceed. National planning policy states that it should support the strategic development needs set out in strategic policies for the area, plan positively to support local development and should not promote less development than set out in the strategic policies (see paragraph 13 and paragraph 29 of the National Planning Policy Framework). Nor should it be used to constrain the delivery of a strategic site allocated for development in the local plan or spatial development strategy.'

If any of your policies take a different approach to the strategic polices in the adopted development plan then your basic conditions statement will need to explain:

- the differing approach,
- the specific circumstances (and associated evidence) that supports the approach taken
- how the policy still meets the test of 'general conformity.'

We still have concerns about how a number of policies are worded and have set out suggested revisions to make them acceptable there are a number of policies which currently are not in general conformity with the strategic policies of the JLP.

We wrote to you in September 2023 confirming that we consider the strategic policies pertaining to the Plymouth Policy Area to be Policies SPT1-14 and PLY1-62 of the adopted Plymouth and South West Devon Joint Local Plan.

We have set out a full response to all the draft policies in the Plan during this response but have summarised the policies that currently fail the test:

H3 – Protection of iconic views

We support the principle of safeguarding important views, but as previously advised we cannot support parts of this policy as drafted because it conflicts with JLP Policies PLY27 and PLY28, which will inevitably affect Views 5 and 22, and therefore Policy H3 may compromise the development potential of those sites and therefore we are of the view that as worded it is not in broad conformity with the JLP.

BG1 – Local Green space designation / Development on green spaces

The designation on Figure 11 now covers PLY27, Millbay Park site has expanded to include football pitch and a developed area between the football pitch and Walker Terrace currently occupied by the armed forces and stretches further east from Hoe Road covering a developed part of Lambhay Hill. None of the sites of previously developed land were assessed in the 'Local Green Space Audit for The Hoe Neighbourhood Plan – December 2022' which is used by the Forum to support sites inclusion.

The criteria is clear in stating that this designation should be used only on green space not on previously developed land and as currently set out. The apparent inclusion of PLY27 alongside these additional sites leads us to believe the policy is being used to prevent development rather than to protect green areas and as worded it is not in broad conformity with the JLP.

HS2 – Housing site PLY27

Whilst the Neighbourhood Forum have included elements of the adopted JLP strategic Policy PLY27 such as active frontages and the relationship with area the removal of a quality hotel, reduction of homes, and the inclusion of a community space, possible retention of registry office role and a restriction of height means this policy is fundamentally not in 'broad conformity with the JLP'.

It conflicts with the PLY27 policy provision to maximise the site's redevelopment potential and the site's role as a strategic gateway to Armada Way. This is major opportunity site in a key position and Policy HS2 would prevent the site from reaching its potential.

Policy HS2 seeks to reduce the number of homes from in the order of 52 as set out in PLY27 to in the order of 38, but we do not consider this desirable or justifiable.

Our Economic Development team have confirmed that there is still evidence of need for new hotel space in the city and therefore this would possibly preclude any change in policy within the next iteration of the local plan.

We object to the policy prescribing specific building heights. We had this debate at the JLP inquiry and the JLP inspectors did not uphold the request to set specific building heights. This wording would compromise optimum redevelopment potential of this important opportunity site.

It is also telling that AECOM, an independent advisor to the Forum, reviewed the emerging draft policies in May 2021 and concluded that the policy wording which at that stage did not set out a reduction in the number of dwellings was '*not in conformity with the basic conditions because elements restate Local Plan policy and not all of the requirements are appropriate in terms of conformity with the local plan*'.

AECOM also recommended at this stage that reference to the register office be deleted because PCC has already relocated the
Register Office.

The report concluded that '*It is valuable to have a Neighbourhood Plan policy specific to this site, but it should not restate some Local Plan requirements and conflict with others- as worded, the policy would fail the Basic Conditions and be deleted.*'

The revised NPPF (December 2024) proposes a new standard method for assessing housing needs which would significantly increase the requirement for new homes within the city and would require each existing site and new sites to maximise their housing potential rather than reducing it as this policy wording does.

Ongoing advice from both your independent advisor and us has been that this policy clearly in not in conformity with the adopted JLP Policy PLY27. In addition there has been no evidence supplied which would demonstrate that there have been significant changes since the Local Plan examination that would warrant a change in approach.

Government Guidance is clear that only a neighbourhood plan that meets the 'basic conditions' can be put to a referendum, therefore we reiterate that our ongoing advice that this policy be deleted.

Conclusion:

The Statement sets out (Para 3.3) that the Neighbourhood Plan has been developed having regard to the NPPF 2019 and Planning Practice Guidance however it currently contains policies which 'promote less development than set out in the strategic policies' and that 'constrain the delivery of a strategic site allocated for development in the local plan' contrary to guidance in both.

In addition given the reasons set out in the summary of specific policies above we do not agree with paragraph 3.10 of the Basic Conditions Statement which states 'The Hoe Neighbourhood

Development Plan has been developed to be in general conformity with the strategic (and other) policies contained in the adopted Plymouth and South West Devon Joint Local Plan'.

The Statement then sets out tables to demonstrate how national and local policy links with the Neighbourhood Plan.

The link to the NPPF merely lists the Neighbourhood Plan objectives and the relevant area in the NPPF but doesn't explain how each policy affects goals in national policy and provides no explanation or evidence as to why the Plan does not support the strategic development needs set out in strategic policies for the area or why it promotes less development than set out in the strategic policies (see paragraph 13 and paragraph 30 of the National Planning Policy Framework). Nor does it seek to justify why policies are being used to constrain the delivery of a strategic site allocated for development in the local plan. In any case, this should be updated to reflect the recently published revised NPPF.

This approach continues in the table setting out how the Neighbourhood Plan support the JLP, the analysis supporting 'Policy SPT13 Provision of New Homes' has no reference to any of the policies we have highlighted that would affect the delivery of new homes.

While the analysis of 'Policy PLY27 Register Office, Lockyer Street, The Hoe' merely states 'Hoe Neighbourhood Development Plan seeks to build on and refine the proposals set out in PLY27 given the sites location'.

There is no attempt in the Basic Conditions Statement currently to explain the draft plan's differing approach to the adopted JLP, the specific circumstances (and associated evidence) that supports this approach or how these policies still meet the test of 'general conformity.'

Consultation Statement

Plymouth City Council's Comments:

The Statement sets out that early engagement was undertaken in 2017-18 and Community Engagement Report was published in April 2018.

Whilst this engagement appears to be wide ranging it was undertaken during the same time as the examination into the JLP was underway but predates the consideration and testing of issues such as Policy DEV27 by the inspector and adoption of the JLP in March 2019.

The Forum made representations on the JLP and were involved at the Examination on Policy PLY27 where their views on building heights and alternative wording were considered by an Independent Planning Inspector.

The Forum therefore needs to be clear about what engagement and consultation has been undertaken following the examination which would support a different approach to this site than set out in the Adopted JLP.

The statement sets out in paragraph 3.12 that 'Over the following years (2019 to 2024) plan-making proceeded through visioning followed by a cycle of five steps (research, policy drafting, policy testing, policy review, engagement and consultation).'

Research Testing:

The Forum set up sub groups to look at four different topic areas (Heritage & Guiding Development, Culture, Tourism & Economy, Blue and Green, Pedestrians and Transport) but it is not clear how many people sat on each group or how these guided the approach to policy drafting.

The Consultation Statement also sets out that targeted surveys were undertaken during this stage but this has not been expanded on further or any details supplied on who was consulted, when and the results.

Details on who was consulted, when and the results should be included in a revised Consultation Statement.

Policy Drafting:

The statement sets out that sub-group members met every six weeks (April 2019 to September 2020) to 'draft policies informed by the existing evidence base, research findings, and views from engagement and consultation'.

Again it is not clear what engagement and consultation had taken place with the community since the examination into the JLP had concluded and therefore it is not clear how this helped to shape the policy development.

Details on who were consulted, when and the results of additional engagement and consultation should be included in a revised Consultation Statement.

Policy Testing:

This work was undertaken in 2021 which included consultation with Plymouth City Council, AECOM and the wider public.

Plymouth City Council and AECOM provided commentary on the policies some were since not taken forward and some such as Developer Contributions and Protection of Iconic Views not included at this stage.

At this stage the statement states that 'the wider public via surveys published on the Forum's website and social media channels and at Hoe Neighbourhood Forum meetings'.

When providing a response to the draft plan received for SEA/HRA testing in June 2023 the Council noted that at that time the Neighbourhood Forum had a webpage https://www.hoeforum.org.uk/ which states that it is making a Neighbourhood Plan for the area but did not include any other information so it is not clear whether these surveys were available on this site at the time.

It is not clear what social media channels the Forum used but we note that there is evidence that the Forum invited and promoted participation in the plan through its open Facebook page on the topic areas between May 6, 2021 – June 2, 2021.

The survey responses now available show that the questions were quite generic but does ask about affordability and mix of housing, travel patterns, low carbon transport, quality of pedestrian routes, heritage and materials, protection of viewpoints, design codes, tourism provision and access to foreshore.

The latest entry on the open Facebook page which mentions any Forum meetings was on the June 24, 2018, which sets out that there is Forum General meeting on Wednesday 27th June at Hoe Bowling Club and that all the information, including the agenda, is posted in the Hoe Neighbourhood Forum members' group. This states that you need to ask to join the group if you would like full details.

The consultation statement needs to clear with evidence showing what open consultation has taken place, when and how this has informed the policy development.

Policy Review:

Whilst elsewhere on the updated webpage contains the responses received from Plymouth City Council and AECOM the statement should give a summary of these responses and set out what has changed or the reasoning why elements have not changed rather than just stating that comments 'were assimilated into a
first round of policy revisions between September 2021 and again in June 2023'.

The Council made a detailed response stating that certain policies should be deleted and asked that others be changed by providing text that would provide clarity, avoid repetition, or simplify policy wording.

It is also noted that ongoing advice from AECOM had mirrored the Council's advice that Registry Office site policy is not in conformity with PLY27 of the adopted JLP and fails the Basic Conditions test.

Additional Consultation and Engagement:

The Statement also highlights that a site specific consultation on the registry office site was undertaken in August- September 2020 and a business survey sent to every business in February 2021.

Registry Office Consultation

We note that the Flyer used in 2020 to publicise HNF's public consultation regarding the former Plymouth Register Office and a summary of results is now available to view on the evidence page of the website.

This sets out that 1,700 were distributed to local homes with responses invited by post, email, and through social media and that there were responses from 45 residents.

The summary is useful in setting out some of the responses but needs to be consistent in approach for example it states that '58% of respondents felt that on-site parking should meet the needs of the development' so this is clear and unambiguous that 26 out of the 45 respondents had this as a concern.

However elsewhere it states that 98% of respondents who commented on trees wanted to retain or increase tree and shrub cover' and '100% of respondents who commented on heights wanted the development to respect the height of surrounding buildings'. This needs to be clear especially when the word 'height' is not clearly identifiable on the narrative feedback word cloud. It would be helpful to have the total number of respondents as well as a percentage to allow for a full analysis and understanding of the level of feeling from previous consultation and engagement activities.

Business Survey

The Forum have provided an example of the questionnaire and that emails and hard copies were delivered on 25 February 2021 and the consultation period was 2 weeks.

It is noted there were no responses and neither of these consultations appear to be advertised on the Forum's Facebook page.

Conclusion:

We are pleased to see that as part of this Regulation 14 consultation the Forum has taken on board our advice from September 2023 by updating the Neighbourhood Forum webpage https://www.hoeforum.org.uk/ which at that time only stated that you were making a Neighbourhood Plan for the area with no further information.

It now allows the public open access to the Plan including the draft Plan, Consultation Statement, Basic Conditions Statement and evidence base.

We would still recommend that minutes of meetings/working groups are available as well.

It is clear that the Forum has undertaken some consultation and engagement; however it is not clear how this has shaped and provided evidence to support the development of some of the policies contained within the Plan.

We would recommend that the Consultation Statement is much clearer in setting out the timeline of consultation, who was consulted, how and when with evidence showing this.

In addition it would benefit from a summary of each consultation setting out what were the key issues raised and how you have addressed those issues.

The examiner will use the consultation statement to judge the effectiveness of the process for engaging the whole community in the preparation of the Neighbourhood Development Plan.

Given the evidence submitted by the forum, and taking into account the observations made above, the LPA is not convinced that sufficiently inclusive consultation has been undertaken to support the drafting of the plan.

In addition we have major concerns over the text used in your letter to statutory consultees on the 18th November in which the Forum states 'If you choose not to respond, then we shall assume that you have no issues with the draft Plan' and consider that this statement would not meet the appropriate tests set out in the Gunning Principles t for consultation.

Appendix A: Method

This report wasn't as easy to put together as hoped. There were four separate sources of feedback: the online comment system, the paper forms that people filled out at the consultation sessions, the "dots" placed on the policy boards at those sessions, and emails from individuals and organisations. Reconciliation was required to make the data comparable for statistical purposes. Here's a summary of the process:

1. We downloaded all comments received though the website's online comment system into a spreadsheet.
2. I added the comments received by email to the spreadsheet. These responses were more free-form than the online responses, so they required some work:
    - Responses from organisations and individuals were separated
    - Comments were assigned to one or more policies/sections or "general" as appropriate
    - Comments were assessed as positive/negative/mixed or "neutral" (which is subjective, of course)
3. I added the comments received on paper to the spreadsheet. All were from individuals, most of whom categorised their own comments Those who did not were assessed as positive/negative/mixed/neutral and assigned to "general" or to a specific section or policy.
4. The data in the spreadsheet was "scrubbed":
    - Organisational responses in the online system were moved to the separate organisation sheet
    - Duplicate entries were removed (some people entered the same thing more than once)
5. The data for individuals was sorted for analysis of respondents
    - Postcodes were checked to see whether they were in or out of the HNP area
    - Number of responses per individual were counted (couples who answered as one were counted as one, not two)
6. All individual comments were sorted by section or policy for analysis separately.
    - Comments received by email or on paper were not automatically assigned to a specific policy or section, and some applied to more than one or to the plan overall. This means the numbers don't add up across the sections and policies when compared to the single list of responses received. Sorry!
7. After the working group meeting on 27 January, I made changes to correct some miscategorised respondents and missing data.