



Hoe Neighbourhood Plan

Regulation 14 Comments Tracker

Contents

Section 1: Introduction to the Hoe Neighbourhood Development Plan.....	3
Section 2: The Planning Policy Context	5
Section 3: About the Hoe Neighbourhood Area	8
Section 4: A Vision for the Hoe Neighbourhood Area.....	11
Section 5: Hoe Neighbourhood Development Plan Policies	15
Section 6: Implementation and Monitoring	22
Policy H1: Integration with Character of the Area	23
Policy H2: High-Quality Design.....	27
Policy H3: Protection of Iconic Views.....	29
Policy H4: Heritage Assets	33
Policy H5: Buildings of Negative Impact	36
Policy H6: Heritage and Energy Efficiency Retrofit	39
Policy H7: Balconies and Roof Gardens.....	41
Policy H8: Retail and Commercial Frontages	43
Policy BG1: Local Green Space Designation/Development on Green Spaces	45
Policy BG2: Protection of Trees, Hedges and Biodiversity	50
Policy BG3: Protection of Street Trees	54
Policy PT1: Promoting Sustainable Mobility	57
Policy PT2: Parking	62
Policy HS1: Housing Mix, Accessibility and Environmental Standard	65
Policy HS2: Housing Site, Former Register Office (Policy HS2 has been deleted from the plan).....	69
Policy DC1: Developer Contributions.....	75

Section 1: Introduction to the Hoe Neighbourhood Development Plan

Dates Reviewed:	30/04/25	19/11/2025
Reviewers:	PT, JB, BS, MS, CW, MW	PT, JB, MS, HK

Organisation or Individual	Code	Section/ Paragraph	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Plymouth City Council Planning Department	S1-PCC1	1.7	<p>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)'.</p> <p>We have made further detailed comments on these concerns under each separate policy and on the Basic Conditions Statement.</p>	<p>Change this paragraph to read: The process of producing the Hoe Neighbourhood Development Plan has sought to involve the local community as widely as possible, and the different topic areas reflect matters that are of considerable importance to local people. The Plan therefore takes heed of local people's views, as expressed through various means of consultation and engagement detailed in the accompanying Consultation Statement. The Hoe Neighbourhood Forum also examined existing policies in the <i>Plymouth and South West Devon Joint Local Plan, the National Planning Policy Framework (update link to 2024 NPPF)</i> (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).</p>	Yes
Plymouth City Council Planning Department	S1-PCC2	1.10	<p><i>Regarding the Basic Conditions Statement:</i> 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.'</p> <p><i>Regarding the Consultation Statement:</i> 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.</p> <p>See also the detailed comments under the Basic Conditions Statement and Consultation Statement sections.</p>	<p>These comments apply to the documents referenced in this paragraph, but don't require any changes here.</p>	No
		Figure 1	Clearer map needed	Replace boundary map with clearer version	Yes

Section 1: Introduction to the Hoe Neighbourhood Development Plan (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Individual	S1-1	Positive	Agreed	Endorsement. No action required.	No
Individual	S1-2	Positive	A well researched and detailed piece of work that should be commended to the Council	Endorsement. No action required.	No
Individual	S1-3	Positive	Quite technical, but a thorough, overall view of the purpose of the Hoe Plan	Endorsement. No action required.	No
Individual	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.	Endorsement. No action required.	No

Section 2: The Planning Policy Context

				Dates Reviewed:	30/04/25	19/11/2025
				Reviewers:	PT, JB, BS, MS, CW, MW	PT, JB, MS, HK
Organisation or Individual	Code	Section/ Paragraph	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)	
Plymouth City Council Planning Department	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.	Updates for the latest NPPF have been made. The removal of our policy HS2 and changes to other policies in this draft have brought the Hoe Neighbourhood Development Plan into line with the NPPF.	Yes	
Plymouth City Council Planning Department	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.	The removal of our policy HS2 and changes to other policies in this draft have brought the Hoe Neighbourhood Development Plan into line with the JLP.	Yes	
Plymouth City Council Planning Department	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.	Before the completion of our Regulation 14 Consultation Plymouth City Council disposed of PLY27 to Hoe Park Heights Ltd, who have sought to engage constructively with the Hoe Neighbourhood Forum. They have pursued pre-application advice and opinion from Plymouth City Council with regards to redevelopment of the Former Register Office site. The plans presented by Hoe Park Heights Ltd for pre-application advice and opinion accord and reflect the analysis of the site and proposes a scale and massing, mix of uses, and key design considerations (including building heights) similar to those proposed through the feasibility work carried out by Hoe Neighbourhood Forum.	Yes	
Plymouth City Council Planning Department	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.	See above.	Yes	

Section 2: The Planning Policy Context (Continued)

Organisation or Individual	Code	Section/ Paragraph	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Plymouth City Council Planning Department	S2-PCC5	2.4.4	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	The Consultation Statement will be modified to link to the background documents that provide evidence of both our early consultations and the formal Regulation 14 consultation.	Yes
Plymouth City Council Planning Department	S2-PCC6	2.4.5	<p>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 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.</p> <p>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.</p> <p>While we received confirmation that the Forum had received this advice the Forum made no contact to further discuss the recommendations.</p>	We have detailed when and how PCC planners were involved in our neighbourhood plan process in the Consultation Statement and summarized it in Section 2.4.5	Yes
Plymouth City Council Planning Department	S2-PCC7	Table 1	<p>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.</p> <p>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.</p> <p>In many cases this didn't change the emphasis for the policy but simplified the policy and removed repetition.</p>	Table 1 should be updated to show how and when PCC was involved in plan development and review.	Yes

Section 2: The Planning Policy Context (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Individual	S2-1	Positive	I can only applaud the hard work that has been put in by all the people who worked on the plan.	Endorsement. No action required.	No
Individual	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.	Endorsement. No action required.	No

Section 3: About the Hoe Neighbourhood Area

Dates Reviewed:	30/04/25	19/11/2025
Reviewers:	PT, JB, BS, MS, CW, MW	PT, JB, MS, HK

Organisation or Individual	Code	Section/ Paragraph	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Plymouth City Council Planning Department	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.	We are producing clearer maps for the plan, but these will need review and checking before we use them. We will update Figure 3 to correct the boundary and coast path errors and include a better legend.	Yes
Plymouth City Council Planning Department	S3-PCC2	3.6.28	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 effect 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	The Indices of Deprivation report's data for air pollution is from 2016. PCC is saying that improvements have been made and Plymouth's overall air quality now exceeds government objectives. PCC also asks for the evidence that the Hoe area's higher levels of pollution "result from the large volume of vehicular movements". Suggest the following changes: The Indices of Deprivation Air Quality Measures (2019) indicated that the Hoe Neighbourhood Area has higher levels of air pollution than Plymouth overall, but its data was based on 2016 figures. High levels of nitrogen dioxide (NO2) meant that Plymouth had to declare an Air Quality Management Area (AQMA) in 2014 and undertake monitoring and remedial action. Local air quality has improved since then, and PCC's latest Air Quality Annual Status Report (June 2024) shows that Plymouth now exceeds national targets in all areas. The government lifted the AQMA in October 2024 after four consecutive years of compliance with air quality standards.	Yes
Plymouth City Council Planning Department	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.	We could not find the original source so we have deleted the reference: "A woodland improvement area within the Hoe Park of high spatial priority"	Yes

Section 3: About the Hoe Neighbourhood Area (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Individual	S3-1	Positive	<p>Section 3: About the Hoe Neighbourhood Area In general statistics for the Hoe 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</p> <p>3.5.4: Does this density take in the open space in the hoe? If so it seems very dense. Please explain/clarify</p> <p>3.6.3: I assume that these figures are derives from the output areas as defined in 3.5.1 Please explain/clarify</p> <p>3.6.17: Are these figures right - any explanation of why such a drop and how does it compare with Plymouth as a whole?</p> <p>3.6.25: Citadel Road, which 'bisects' the area from east to west - I think it 'runs' from east to west (not bisects)</p>	<p>We did not feel there was a need to do a comparison with other cities.</p> <p>3.5.4 The area calculations were not accurate, but they have now been checked and corrected here and elsewhere.</p> <p>We think it's obvious that it is</p> <p>3.6.25 Change: Citadel Road, which runs east-west through the middle of the area, is also well-used and can become congested during school-run times.</p>	<p>No</p> <p>Yes</p> <p>No</p> <p>Yes</p>
Individual	S3-2	Positive	<p>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 presented. I will undoubtedly refer to them simply out of interest in the future. Again, well done for such a brilliant study!</p>	<p>Endorsement. No action required.</p>	<p>No</p>
Individual	S3-3	Positive	<p>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.</p>	<p>Endorsement. No action required.</p>	<p>No</p>
Individual	S3-4	Positive	<p>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 appreciated.</p>	<p>Endorsement. No action required.</p>	<p>No</p>

Section 3: About the Hoe Neighbourhood Area (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Individual	S3-5	Neutral	<p>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.</p> <p>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.</p> <p>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'.</p> <p>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</p>	<p>3.1.2 Delete "locally"</p> <p>3.2.1 We think that the myth is a good thing to invoke here.</p> <p>3.2.2 Change "a monument" to "chalk figures"</p> <p>3.2.3 Change last sentence Map evidence makes it clear, however, that the greater part of the Hoe westwards of the Citadel was effectively undeveloped before the late 19th century because the Hoe provided a clear firing zone from which seaborne invaders could be spotted</p> <p>3.2.4 Change date for Hoe Park from 1817 to 1871 and from 1887 to "the 1880s" as per Chris Robinson's comment</p>	<p>Yes</p> <p>No</p> <p>Yes</p> <p>Yes</p> <p>Yes</p>
Individual	S3-6	Neutral	<p>3.1.2 Britain's Ocean City internationally, not just a local thing</p> <p>3.1.4 Mount Edgcombe (too many e's)</p> <p>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.</p> <p>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</p> <p>Incidentally where you mention Beatlebums ... it's not Plymouthians there's no 'u' it's Plymothians</p>	<p>3.1.2 – Delete "locally" (as above)</p> <p>3.1.4 – Correct "Edgcombe"</p> <p>3.2.5 – Change to "laid out in the 1880s" but don't add extra detail</p> <p>3.2.7 – Add James Paton Watson's name to the plan!</p> <p>Appendix 2: Correct the spelling of "Plymothians" in the Beatlebums citation.</p>	<p>Yes</p> <p>Yes</p> <p>Yes</p> <p>Yes</p> <p>Yes</p>

Section 4: A Vision for the Hoe Neighbourhood Area

				Date Reviewed:	30/04/25	19/11/2025
				Reviewers:	PT, JB, BS, MS, CW, MW	PT, JB, MS, HK
Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)	
Individual	S4-1	Positive	The chart is an excellent way to present the hierarchy	Endorsement. No action required.	No	
Individual	S4-2	Positive	Looks like a sensible well thought out vision to me .	Endorsement. No action required.	No	
Individual	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.	Endorsement. No action required.	No	
Individual	S4-4	Positive	It will be a real balancing act but wonderful if done competently.	Endorsement. No action required.	No	
Individual	S4-5	Positive	<p>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:</p> <ol style="list-style-type: none"> 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. <p>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.</p> <p>Apologies if you have already consisted all this. I'm writing this on my phone whilst sorting the kids' dinner out.</p> <ol style="list-style-type: none"> 1) Finally, thanks again for the hard work you all do in protecting and enriching our neighbourhood 	<p>This respondent would like to see more said in the plan about:</p> <ol style="list-style-type: none"> a) waterfront facilities that encourage people, particularly children and young people, to engage in activities here b) other local facilities/activities for children and young adults – both of these to make the Hoe area more family-friendly <p>Additional detail has been added in the Blue-Green Policies section.</p>	Yes	

Section 4: A Vision for the Hoe Neighbourhood Area (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Individual	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.	Endorsement. No action required.	No
Individual	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.	Endorsement. No action required.	No
Individual	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	Endorsement. No action required.	No
Individual	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.	Endorsement. No action required.	No
Individual	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	Suggested change to section 4.1.3: The Hoe is a focal point for all of Plymouth's residents, as well as visitors from farther away. As such, its public spaces, parks, and roads are used by visitors as much as by Hoe residents, at times giving rise to tensions. Balancing the need to foster a thriving tourist economy, a public amenity for all Plymothians, and the peaceful enjoyment of residents' homes and neighbourhood is an important community priority and a key objective of the Hoe Neighbourhood Development Plan.	Yes
Individual	S4-11	Positive	Much work here. Good understanding of Hoe and its needs, and of its community. Excellent objectives with sensible actions.	Endorsement. No action required.	No
Individual	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.	This respondent admits that this overall vision section is the only thing s/he's read so far, so it's not clear whether the other sections addressed the concerns mentioned. I can't see any specific change required to this section from this comment.	No

Section 4: A Vision for the Hoe Neighbourhood Area (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Individual	S4-13	Positive	I would support all these objectives.	Endorsement. No action required.	No
Individual	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.	Endorsement. No action required.	No
Individual	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 local 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 existing built and natural environment, while planning for the future. I support what has been proposed. The best use should be made of existing 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.	Endorsement. No action required.	No
Individual	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.	This respondent believes our plan is infused with a "woke agenda". The bulk of other comments support our green policies and, if anything, encourage us to make them stronger. This commenter's opinion is an outlier.	No
Individual	S4-17	Positive	I fully support the vision statement.	Endorsement. No action required.	No
Individual	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 sensitivity 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.	This respondent is keen on the National Marine Park, which isn't mentioned specifically in this section, but it is dealt with in the Culture, Tourism and Economy topic in Section 5.	No

Section 4: A Vision for the Hoe Neighbourhood Area (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Individual	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.	We disagree on the need for changing the wording	No
Individual	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.	Endorsement. No action required.	No
Individual	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.	4.1.5 Yes, change it from "global warming" to "climate change"	Yes

Section 5: Hoe Neighbourhood Development Plan Policies

				Dates Reviewed:	30/04/25	19/11/2025
				Reviewers:	PT, JB, BS, MS, CW, MW	PT, JB, MS, HK
Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)	
Environment Agency SPDC	S5-EA	Mixed	<p>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.</p> <p>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.</p>	The LNRS will not be finalised before our submission of the plan. However, we have made changes based on Plymouth's latest Plan for Nature and People.	Yes	
Historic England	S5-HE	Positive	<p>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.</p>	We have now deleted the HS2 policy concerning PLY27.	Yes	

Section 5: Hoe Neighbourhood Development Plan Policies (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Plymouth Civic Society	S5-PCS	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.	We do believe that short-term lets (like AirBnB) can have a negative impact on the neighbourhood.	No
Individual	S5-1	Positive	Just what I would have wanted for a plan. I Support every aspect.	Endorsement. No action required.	No
Individual	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 proposals are managing that well.	Endorsement. No action required.	No
Individual	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.	Endorsement. No action required.	No

Section 5: Hoe Neighbourhood Development Plan Policies (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Individual	S5-4	Positive	It is important that existing local amenities 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.	Endorsement. No action required.	No
Individual	S5-5	Mixed	<p>ISSUES OF CURRENT CONCERN that I have perceived since moving to the area three years ago - (not in priority order) -</p> <ol style="list-style-type: none"> 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. 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 of 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 <ul style="list-style-type: none"> - 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. 	The issues raised may be valid but they are not planning issues that can be addressed in a neighbourhood plan.	No

Section 5: Hoe Neighbourhood Development Plan Policies (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Individual	S5-5	Mixed	<p>NB Page 52 “noise and air pollution” and the concept of a ‘healthy city’.</p> <p>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.</p> <p>8. Poor quality murals in prominent positions should be removed as should ill advise Signage on commercial premises.</p> <p>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.</p>	The issues raised may be valid but they are not planning issues that can be addressed in a neighbourhood plan.	No
Individual	S5-6	Positive		No specific comments	No
Individual	S5-7	Positive	<p>Positive response to Clause 1 of the Culture, Tourism, and Economy Community Aspirations.</p> <p>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.</p> <p>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.</p>	The issues raised may be valid but they are not planning issues that can be addressed in a neighbourhood plan.	No
Individual	S5-8	Mixed	<p>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</p>	<p>We believe that diving boards in safe places would be beneficial.</p> <p>We have added the Harbour Master.</p> <p>PCC has now provided electrical hookups for ice cream vans along the Hoe waterfront and the vans are converting over. It is an improvement!</p>	<p>No</p> <p>Yes</p> <p>No</p>

Section 5: Hoe Neighbourhood Development Plan Policies (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Individual	S5-9	Mixed	<p>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 snorkeling. 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</p> <p>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)</p> <p>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.</p>	The Hoe Neighbourhood Forum may comment on this separately, but no change needed to the plan.	No
Individual	S5-10	Mixed	<p>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?</p>	A proposal to pedestrianise Madeira Road was explored in our early consultations, and there is considerable community support for this idea. However, this is not strictly a planning issue that can be dealt with in a neighbourhood plan. The Hoe Forum would be supportive of such a measure.	No

Section 5: Hoe Neighbourhood Development Plan Policies (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Individual	S5-11	Negative	<p>My comments relate to 'Community Aspirations' section related to policies BG2 and BG3, but are not criticism of the policies.</p> <p>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.</p> <p>. 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).</p> <p>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 discharge map.</p> <p>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).</p>	<p>We do hope to reduce the damage caused by barbecues in Hoe Park, so we will retain this aspiration.</p> <p>The Hoe Park has a Green Flag award but other areas do not.</p> <p>We have removed community composting from our aspiration because PCC is improving its green bin and food waste collections.</p> <p>Water quality is important but not a planning issue.</p> <p>We have changed it to specify using aerial imagery to categorise private green spaces so we have a better idea about the overall amount of green area in our neighbourhood.</p>	<p>No</p> <p>No</p> <p>Yes</p> <p>No</p> <p>Yes</p>
Individual	S5-12	Positive	<p>Agree with the Green policies. Re-plant the Hoe with trees.</p> <p>Create a wildlife area for children.</p>	<p>Endorsement. No action required.</p>	<p>No</p>
Individual	S5-13	Neutral	<p>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.</p>	<p>Since the sale of the Register Office, we have decided to add the need for a congregational space to our community aspirations.</p>	<p>Yes</p>
Individual	S5-14	Mixed	<p>End SWW pollution – water quality warnings etc. good I support HNP provisions. Yes – summer bandstands</p>	<p>We agree that SWW should take their responsibility to clean water seriously, but it is not a neighbourhood plan issue.</p>	<p>No</p>
Individual	S5-15	Neutral	<p>Please extend timetable of 25 bus especially during dark winter evenings</p>	<p>The Forum has been raising this issue whenever possible, and the No 25 bus schedule has been extended into the evening hours. (But this is not a planning issue.)</p>	<p>No</p>

Section 5: Hoe Neighbourhood Development Plan Policies (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Individual	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 Plymothians 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	Fortunately, the No 25 bus schedule has been extended into the evening hours. The council's policy on parking for new builds is in line with national policy. The ferry port is outside the Hoe Neighbourhood Area boundary.	No
Individual	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	Seaweed is a natural thing on a shore and cleaning them would destroy habitats. The diving boards are in our list of aspirations, as is better maintenance of everything in the Hoe area.	No
Individual	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??	We have strengthened our policies and aspirations for signage and street furniture in the latest draft.	Yes
Individual	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.	Better maintenance is high on the Hoe Forum's list, and we raise issues with our councilors on this subject on a regular basis, but it is not a planning issue.	No

Section 6: Implementation and Monitoring

				Date Reviewed:	02/03/25	19/11/2025
				Reviewers:	JB	PT, JB, MS, HK
Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)	
Individual	S6-1	Positive	Agreed	Endorsement. No action required.	No	
Individual	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.	This is covered in section 6.3.	No	
Individual	S6-3	Positive	All good... important to monitor and review	Endorsement. No action required.	No	
Individual	S6-4	Positive	This is the time to thank all concerned that have put this all together and thank all who have contributed.	Endorsement. No action required.	No	
Individual	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.	Endorsement. No action required.	No	
Individual	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.	Once our plan is made, it is PCC's responsibility to ensure that developers know of it and follow its guidelines. The point about the design guide being hard to find is relevant, but we have brought the relevant parts of the design guide into the plan itself in policies H1, H2, and others.	No Yes	
Individual	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.	Endorsement. No action required.	No	

Policy H1: Integration with Character of the Area

Dates Reviewed:	02/04/25	13/11/2025
Reviewers:	PT, HK, CW, KS	HK, JB, KS, CW

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Environment Plymouth	H1-EP	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.	Endorse policy, but they recommend review of PCC suggested wording in feedback as below.	No
Plymouth City Council Planning Department	H1-PCC	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.	We have reworded this section to eliminate the confusion between the four character areas defined for the Hoe Conservation Area and the two defined for the Hoe Neighbourhood Area. We have incorporated the relevant sections of the Design Guide into the HNP in this policy, Policy H2, and elsewhere. Agree with recommendation to merge some policy subsections and simplify the policy. Locality suggests the following wording on heights: Building heights above prevailing patterns need to be explained and justified in the Design & Access Statement and accompanied by a Tall Building Statement, so this issue is still covered but not in a freestanding document.	Yes

Policy H1: Integration with Character of the Area (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Plymouth City Council Planning Department	H1-PCC	Negative	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>Having considered all ten principles, and callibrating with PCC suggested wording, we propose a revised Policy H1 which incorporates the original principles and satisfies PCC recommendations. It has been a useful exercise to re-examine the wording, as we did identify some duplication.</p>	
Plymouth City Council Planning Department	H1-PCC	Negative	<p>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.</p> <p>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.</p>	<p>Change to the following wording:</p> <p>Policy H1: Integration with Character of the Area 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.</p> <ol style="list-style-type: none"> 1.Development proposals should have sympathetic regard to the scale, siting, roof lines, materials, fenestration, and colour palette of neighbouring buildings. 2.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. 3.New developments must properly demonstrate how the proposed proportions will not dominate their setting or negatively impact on adjacent properties 4.Where appropriate, a formal landscape and visual impact assessment should be submitted. 	

Policy H1: Integration with Character of the Area (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Individual	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.	Endorses Policy. This is now covered by Principle 1 of Policy H1	No
Individual	H1-2	Positive	Yes, in scale & character area (No massive high rise) But energy efficiency & green adaptations	Endorses Policy. Green adaptations are covered in Policy H6	No
Individual	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.	Endorses Policy and makes specific reference to PLY28. This is covered by Principle 1 of Policy H1	No
Individual	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.	Endorsement. No action required.	No
Individual	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.	Endorsement. No action required.	No
Individual	H1-6	Positive	Policy supported	Endorsement. No action required.	No
Individual	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.	Endorsement. No action required.	No
Individual	H1-8	Positive	Agree with the 10 Ideas under this Policy	Endorsement. No action required.	No
Individual	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.	Endorsement. No action required.	No
Individual	H1-10	Positive	Important not to lessen historical character of the neighbourhoods. Resident of over 20 years.	Endorsement. No action required.	No
Individual	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.	Endorsement. No action required.	No

Policy H1: Integration with Character of the Area (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Individual	H1-12	Positive	Support this policy, and would add that if permission is granted for a building within the Hoe and Barbican Conservation Areas, then if during the redevelopment any modification to the height is proposed this should be considered a significant and substantial change to the planning consent and require an alternative solution to be required or a new Planning Application to be made.	Endorses Policy and emphasises concerns over heights of buildings	No
Individual	H1-13	Positive	I think this policy H1 is spot on, many thanks.	Endorsement. No action required.	No
Individual	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.	Endorses Policy. Comment re Tall Building Report - this is covered by PCC's own policies and incorporated within Principle 4 of H1 Wording re Tall Building Report added following Locality's wording recommendations.	Yes
Individual	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?	Neutral - asks a question re. consultation. HNF now receives pre planning applications and will be a statutory consultee when the plan is adopted. Commenter could be advised of pre-apps by participating in forum meetings or via PCC website.	No

Policy H2: High-Quality Design

				Dates Reviewed:	02/04/25	13/11/2025
				Reviewers:	PT, HK, CW, KS	HK, JB, KS, CW
Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)	
Environment Plymouth	H2-EP	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.	Endorses Policy. PCC have advised to incorporate the Design Guide into the Plan, which would give it more status as a planning requirement, and we have agreed to do so.	Yes	
Plymouth City Council Planning Department	H2-PCC	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.	PCC response is ambiguous as previously they advised including the Design Guide in the plan, whereas here they recommend deletion. We concur with the initial comment for inclusion re H1 feedback. The Design Guide was part of the Reg 14 consultation and some key consultees have positively supported it. We have incorporated the relevant sections of the Design Guide into our policies.	Yes	
Individual	H2-1	Positive	Agreed	Endorsement. No action required.	No	
Individual	H2-2	Positive	This should be extended to include remediation works due to defective cladding on high rise buildings in the Forum area	Endorses Policy. Defective work on cladding is not within the remit of HNF - government/council responsibility	No	
Individual	H2-3	Positive	Admirable design guide and insistence on it being followed	Endorsement. No action required.	No	
Individual	H2-4	Positive	Same thoughts as on previous section.	Endorsement. No action required.	No	
Individual	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.	Endorsement. No action required.	No	
Individual	H2-6	Positive	I believe now is the time for change, that a very modern design should be able to sit by an extension to an older building or sit by itself as a new building.	We do not object to "very modern design" but it needs to satisfy HNF Policies.	No	
Individual	H2-7	Positive	I support this policy as an essential requirement.	Endorsement. No action required.	No	
Individual	H2-8	Positive	Agree with Policy H2	Endorsement. No action required.	No	

Policy H2: High-Quality Design (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Individual	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".	Endorsement. No action required.	No
Individual	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.	Endorsement. No action required.	No
Individual	H2-11	Positive	Support this policy	Endorsement. No action required.	No
Individual	H2-12	Positive	We particularly like the design code which will help businesses in our area really deliver quality in such an iconic location.	Endorsement. No action required.	No

Policy H3: Protection of Iconic Views

			Dates Reviewed:	02/04/25	18/11/25
			Reviewers:	PT, HK, CW, KS	PT, JB, MS, KS, CW
Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Commonwealth War Graves Commission	H3-CWGC	Positive	The immediate Hoe area - the Armada Way view - seems to be the greatest benefit to the differing aspects of our memorial.	Endorsement. No action required.	No
Environment Plymouth	H3-EP	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.	Endorses policy strongly. Advises consideration of PCC feedback, which we have done and made the changes shown below in the PCC section. Emphasises that HNP could be most effective way of achieving goals.	Yes
Historic England	H3-HE	Positive	We welcome the chapter on Heritage, but particularly applaud the sections: Policy H3: Protection of Iconic Views	Strong endorsement. No action required.	No
Plymouth City Council Planning Department	H3-PCC	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	We have added the following text to Policy H3's intent to clarify our position: The Hoe Neighbourhood Forum is aware that Plymouth's PLY 27 and PLY28 sites have been allocated for hotels/apartment blocks, and development on these sites will inevitably affect views from the Hoe promenade. If development on these sites adheres to our other heritage and design policies, however, the adverse impact on the Hoe's iconic views would be minimised.	Yes

Policy H3: Protection of Iconic Views (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Plymouth City Council Planning Department	H3-PCC	Negative	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.	Based on PCC's advice and comments from others, we have simplified and renumbered our list of views. Some views that were similar have been combined into a single broad vista: - 2, 6, 9 & 10 combined into new view #1 - 7 & 8 combined into new view #7 - 14-16 combined into new view #4 Some view descriptions have been corrected as advised by PCC and others.	Yes
Plymouth City Council Planning Department	H3-PCC	Negative	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	Agree to suggested wording, except for "where possible": Development proposals should ensure that key views of heritage assets, areas of landscape, coast and green spaces can continue to be enjoyed. 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. Add to Appendix 1 some explanation of the choices, eg. to protect views from the sea for those on boats/cruise ships/ferry or to protect long vista towards Dartmoor.	Yes
Individual	H3-1	Positive	Agreed	Endorsement. No action required.	No
Individual	H3-2	Positive	Iconic Views – Please protect. NO high rise buildings	Endorses Policy Raises concern re high rise buildings	No
Individual	H3-3	Positive	Temporary structures supporting events on the Hoe should also have regard for the enjoyment of residents and visitors	Temporary structures do not fall within planning issues.	No
Individual	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.	Endorsement. No action required.	No

Policy H3: Protection of Iconic Views (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Individual	H3-5	Positive	The importance of maintaining these views cannot be overestimated: see what is said about the unfortunate Saltwater Place development	Endorses Policy Raises concern re high rise buildings	No
Individual	H3-6	Positive	There should be no developments which impact upon the exquisite and unique views as described above.	Endorsement. No action required.	No
Individual	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, though I think the important views are the huge vistas rather than narrow sections.	Endorsement. Use broad vistas rather than individual views.	Yes
Individual	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.	Endorsement. No action required.	No
Individual	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 height of existing trees and foliage has already starting to block these views.	We agree this can be an issue, but tree management lies outside the scope of planning policy. Added to Community Aspirations to work with PCC and other landowners to encourage appropriate tree management to preserve views.	Yes
Individual	H3-10	Negative	Crucial to avoid any over development 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.	Endorsement. No action required.	No
Individual	H3-11	Positive	Agree with Policy H3	Endorsement. No action required.	No

Policy H3: Protection of Iconic Views (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Individual	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.	Endorses Policy Raises concern about high-rise buildings	No
Individual	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.	Endorsement. No action required.	No
Individual	H3-14	Positive	The Hoe is truly unique with the best vista in the UK, this will protect it for future generations to enjoy.	Endorsement. No action required.	No

Policy H4: Heritage Assets

			Dates Reviewed:	02/04/25	18/11/25
			Reviewers:	PT, HK, CW, KS	PT, JB, MS, KS, CW
Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Commonwealth War Graves Commission	H4-CWGC	Neutralif 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.	Endorsement. No action required.	No
Defence Infrastructure Organisation	H4-DIO	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.	As an English Heritage representative has intimated, the ramparts to the Citadel are regarded as having equal status to Stonehenge. This is our number one Heritage Asset. Additional protection as in H4 can only be advantageous. Maps are imported from the Ordnance Survey but we have taken the P out.	No Yes
Environment Plymouth	H4-EP	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, the 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.	Strongly endorses policy and suggests HNP should take a more proactive role in protecting assets. Singles out the Citadel - see comment for H3-DIO above. Author suggests HNP determine criteria for defining a heritage asset, but our view is that this could be too restrictive, for example, could exclude incorporation of contemporary memorabilia and assets (see Appendix 2)	No

Policy H4: Heritage Assets (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Historic England	H4-HE	Positive	We welcome the chapter on Heritage, but particularly applaud the sections: Policy H4: Heritage Assets	Strongly endorses policy	No
Plymouth Civic Society	H4-PCS1	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.	More was added to the justification section for the Citadel. The Belvedere is already Grade II listed.	Yes
Plymouth Civic Society (2)	H4-PCS2	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.	Add the official name Belvedere to the "wedding cake" references.	Yes
Plymouth City Council Planning Department	H4-PCC	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.	We strongly disagree - would wish to retain this policy, not only for additional protection of existing non-listed heritage assets, but also to protect future heritage assets. Neighbourhood Forums have the right to include a Local List, which allows us to go into a more granular level of detail about the assets of value in our area. There is strong support from the community for this. Locality recommends looking at: https://historicengland.org.uk/listing/what-is-designation/protecting-heritage-beyond-list/#:~:text=What%20can%20be%20added%20to,Maritime%20heritage%20and%20shipwrecks and https://www.westnorthants.gov.uk/neighbourhood-planning/heritage-and-neighbourhood-plans	No

Policy H4: Heritage Assets (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Individual	H4-1	Positive	agreed	Endorsement. No action required.	No
Individual	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 access 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.	This is an issue to be taken up through the Forum meetings and with Councillors rather than put into planning policy.	No
Individual	H4-3	Positive	Yes indeed. Good to spell it out although it should be obvious.	Endorsement. No action required.	No
Individual	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.	Covered by H6 -- no action here.	No
Individual	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.	Endorses policy and strongly supports our reasoning for keeping policy	No
Individual	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.	Endorsement. No action required.	No
Individual	H4-7	Positive	Agree	Endorsement. No action required.	No
Individual	H4-8	Positive	Agree with Policy H4	Endorsement. No action required.	No
Individual	H4-9	Positive	I agree. I didn't realise Plymouth had so many historic assets.	Endorses Policy and strongly supports our reasoning for keeping policy	No
Individual	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.	Endorsement. No action required.	No

Policy H5: Buildings of Negative Impact

				Dates Reviewed:	16/04/2025	18/11/25
				Reviewers:	PT, HK, ET, BS, MW, MS, JB	PT, JB, MS, KS, CW
Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)	
Environment Plymouth	H5-EP	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.	Endorses policy with reservations Note that buildings of negative impact are not targeted for demolition, but if they are redeveloped, this policy requires that they be replaced with something that fits in better and is of high-quality design. See commentary re H5-PCC below.	No	
Historic England	H5-HE	Positive	We welcome the chapter on Heritage, but particularly applaud the sections: Policy H5: Buildings of Negative Quality	Endorsement. No action required.	No	

Policy H5: Buildings of Negative Impact (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Plymouth City Council Planning Department	H5-PCC	Negative	<p>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.</p> <p>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.</p> <p>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.</p> <p>The Climate Emergency Planning Statement seeks refurbishments and improvements ahead of demolition.</p> <p>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.</p>	<p>PCC recommend withdrawing Policy H5 despite Historic England endorsing the policy and considerable public support. The committee considered dropping the policy, but given the level of public support this was not felt to be a good reflection of the overall consultation response.</p> <p>Most of negative impact buildings on the list were identified in the Hoe Conservation Area Management Plan and the AECOM appraisal. The heritage sub-group produced a list of negative buildings from each of these sources, but they also included some additional buildings based on criteria from JPL policy DEV20. We have added a table to the justification section to show the criteria for inclusion on the negative impact list.</p>	Yes

Policy H5: Buildings of Negative Impact (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Individual	H5-1	Positive	Good	Endorsement. No action required.	No
Individual	H5-2	Positive	Absolutely agree!	Endorsement. No action required.	No
Individual	H5-3	Positive	Ambitious aim, but important to state and insist on.	Endorsement. No action required.	No
Individual	H5-4	Positive	How did they ever get passed? Could they be knocked down?	Endorsement. No action required.	No
Individual	H5-5	Positive	Support	Endorsement. No action required.	No
Individual	H5-6	Neutral	Appendix 4 not sure consolidated is the right word, located perhaps	Endorsement. No action required.	No
Individual	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.	Endorses Policy and expresses concern over recent developments which the council have claimed are positive additions....	No
Individual	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.	Endorsement. No action required.	No
Individual	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.	Comment noted, but no specific details given here to act upon.	No
Individual	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.	Endorsement. No action required.	No
Individual	H5-11	Positive	Agree.	Endorsement. No action required.	No
Individual	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.	Endorsement. No action required.	No
Individual	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 Barbican as being of Neutral or Negative Quality should not be used as a precedent for new development.	Endorsement. No action required.	No

Policy H6: Heritage and Energy Efficiency Retrofit

Dates Reviewed:	16/04/2025	13/11/2025
Reviewers:	PT, HK, ET, BS, MW, MS, JB	HK, JB, KS, CW

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Climate Action Plymouth	H6-CAP	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.	Strongly endorses H6 Pedestrians and cycling covered in PT policies.	No
Environment Plymouth	H6-EP	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.	Endorsement. No action required.	No
Plymouth City Council Planning Department	H6-PCC	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.	Endorsement. No action required. References to policy DEV22 have been deleted. It was probably a typo for DEV32.	Yes
Individual	H6-1	Positive	Very Good	Endorsement. No action required.	No
Individual	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.	Endorsement. No action required.	No
Individual	H6-3	Positive	Yes, retrofits need to happen, climate change	Endorsement. No action required.	No
Individual	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.	Endorsement. No action required.	No

Policy H6: Heritage and Energy Efficiency Retrofit (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Individual	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	Policy already includes "thermally efficient glazing", so no change needed.	No
Individual	H6-6	Positive	Necessary - but the word 'sensitive' is important and could be subjective.	Steering group agreed to adjust wording to 'preserve the character and features' rather than 'sensitive'.	No
Individual	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.	Endorsement. No action required.	No
Individual	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.	Endorses Policy. We understand Historic England have published new positive guidance on this.	No
Individual	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.	Endorsement. No action required.	No
Individual	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.	Endorsement. No action required.	No
Individual	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.	Endorsement. No action required.	No
Individual	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.	Endorsement. No action required.	No
Individual	H6-13	Positive	Wholeheartedly agree with Policy H6	Endorsement. No action required.	No
Individual	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.	Endorsement. No action required.	No
Individual	H6-15	Positive	Supported	Endorsement. No action required.	No
Individual	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.	Endorsement. No action required.	No
Individual	H6-17	Positive	Support this Policy	Endorsement. No action required.	No

Policy H7: Balconies and Roof Gardens

				Dates Reviewed:	16/04/2025	13/11/2025
				Reviewers:	PT, HK, ET, BS, MW, MS, JB	HK, JB, KS, CW
Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)	
Environment Plymouth	H7-EP	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.	Endorses Policy.	No	
Plymouth City Council Planning Department	H7-PCC	Negative	<p>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.</p> <p>As with previous advice given in September 2023, we continue to suggest the following wording which would make the policy acceptable:</p> <p>i. Development proposals which include balconies and roof gardens / terrace areas that require planning permission will only be supported if they:</p> <ul style="list-style-type: none"> -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. 	<p>Steering group agreed to accept suggested wording. Delete "Heritage Assets" clause Revised wording:</p> <p>i. Development proposals which include balconies and roof gardens / terrace areas that require planning permission will only be supported if they:</p> <ul style="list-style-type: none"> -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. 	Yes	
Individual	H7-1	Positive	Agreed	Endorsement. No action required.	No	
Individual	H7-2	Positive	Balconies, no overlooking, OK	Endorsement. No action required.	No	
Individual	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 overlooking but with appropriate green screening this can be mitigated.	Endorsement. No action required.	No	
Individual	H7-4	Positive	Yes. Nice things to have but could impact negatively on neighbours.	Endorsement. No action required.	No	
Individual	H7-5	Positive	Again, important to maintain the integrity of the Hoe and to protect the residents who live here.	Endorsement. No action required.	No	

Policy H7: Balconies and Roof Gardens (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Individual	H7-6	Positive	It would be good if these principles were already applied – can they be applied retrospectively?	Endorses Policy - but rules cannot apply retrospectively	No
Individual	H7-7	Positive	I wholly agree with these requirements for any proposals that might come forward without banning them completely in an appropriate location.	Endorsement. No action required.	No
Individual	H7-8	Positive	It is key that these should not cause any inconsiderate impact on neighbours. Planning permission should be obtained in its usual way. Agree with the INTENT:	Endorsement. No action required. Not to have ANY impact would be too restrictive because in a dense city centre few additions would fail to have some less than positive affects	No
Individual	H7-9	Positive	Agree with Policy H7	Endorsement. No action required.	No
Individual	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.	Endorsement. We think that this is satisfied by the new wording suggested in the PCC comments area.	No
Individual	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.	Endorsement. Steering group discussed this suggestion but are guided by PCC's proposal to reword the policy as stated above.	No
Individual	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.	Steering group felt that the wording change proposed by PCC addresses the first point made here. Steering group discussed adding internal roof extensions to the policy, but felt that this should already be covered by existing policy. Extensions come under separate PCC planning policies.	No

Policy H8: Retail and Commercial Frontages

Dates Reviewed: 16/04/2025
 Reviewers: PT, HK, ET, BS, MW, MS, JB

13/11/2025
 HK, JB, KS, CW

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Environment Plymouth	H8-EP	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.	Endorses Policy. Steering group agreed to additional lighting clause as suggested: "Consideration of potential light pollution on neighbouring residential properties"	Yes
Plymouth City Council Planning Department	H8-PCC	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.	Steering group agreed to remove the specific employment argument from the justification text. It's now just a general one: "contribute to the success of local businesses as well as increasing the employment opportunities for residents".	Yes
Individual	H8-1	Positive	Is there any way we can audit existing signage/features that have a negative quality and get changes made?	Unfortunately rules cannot be applied retrospectively. Specific concerns about existing signage can be raised with Ward Councilors or via Forum meetings.	No
Individual	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.	Steering group agreed that maintenance of paving and flower tubs is important, but outside the scope of planning policy. We added a maintenance items to the list of community aspirations.	Yes
Individual	H8-3	Neutral	Commercial & other signage – minimum!	Endorsement. No action required.	No
Individual	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.	We believe that good planning policy produces a favourable environment for business customers, which in turn benefits the business owners (as per justification statement). HNF are committed to working with local businesses. The justification section has been adjusted to say this. NB. the original plan had a large section about support for the local economy, but sadly this area could not be covered by planning policy.	Yes

Policy H8: Retail and Commercial Frontages (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Individual	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.	Endorsement. No action required.	No
Individual	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.	Endorsement. No action required.	No
Individual	H8-7	Positive	Agree	Endorsement. No action required.	No
Individual	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.	Endorsement. No action required.	No
Individual	H8-9	Positive	A set of sensible requirements.	Endorsement. No action required.	No
Individual	H8-10	Positive	Important not to allow posters for advertising stuck up in windows.	Point taken, but posters in windows are not a planning policy issue.	No
Individual	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.	Endorsement. No action required.	No
Individual	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.	This is covered in Policy H5 (Buildings of Negative Quality)	No
Individual	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	Endorsement. No action required.	No
Individual	H8-14	Positive	Supported	Endorsement. No action required.	No
Individual	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.	Endorsement. No action required.	No
Individual	H8-16	Positive	Fully support this policy.	Endorsement. No action required.	No
Individual	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.	Endorsement. No action required.	No
Individual	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.	Endorsement. No action required.	No

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

				Dates Reviewed:	19/03/25	19/11/2025
				Reviewers:	PT, HK, CW, MW, MS, JB, BS, HJ	PT, BS, JB, MS
Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)	
Environment Agency SPDC	BG1-EA	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.	The LNRS will not be completed in time for this draft of our plan. However, the recent Plymouth Plan for Nature and People will be referenced for the BG policies.	Yes	
Environment Plymouth	BG1-EP	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.	The Forum plans to work more closely with Environment Plymouth to seek to better protect the green and blue areas from pollution and especially plastic pollution. This is covered by our BG community aspirations 1b, 2, 3, and 4.	No	
Plymouth City Council Planning Department	BG1-PCC	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 references 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.	<p>Because there was considerable local support for it, the steering committee agreed to go ahead with the Local Green Space designations in this policy.</p> <p>We will update the Plan's green space map to show each green space individually. The map key in the plan needs to explain that the references are taken from PCC's green space review.</p> <p>Our green space audit describes each of the green spaces and provides photos.</p> <p>References to 'Plymouth's Green Space Strategy' and its Background Report' have been revised. Added the latest JLP to evidence sources.</p>	<p>No</p> <p>Yes</p> <p>Yes</p> <p>Yes</p>	

Policy BG1: Local Green Space Designation / Development on Green Spaces (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Plymouth City Council Planning Department	BG1-PCC	Negative	<p>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.</p> <p>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.</p> <p>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.</p>	<p>The foreshore is one of the open spaces most valued by local people, and we believe it should be included on our list.</p> <p>The inclusion of the football pitch and the military facilities in the last draft was an error and has now been corrected on the map.</p>	<p>No</p> <p>Yes</p>
Plymouth City Council Planning Department	BG1-PCC	Negative	<p>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.</p> <p>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.</p> <p>Link: https://www.gov.uk/guidance/neighbourhood-planning--2#contents</p>	<p>PLY27 should not have been shown as a green space and has been corrected on the map.</p>	<p>Yes</p>
Plymouth City Council Planning Department	BG1-PCC	Negative	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>The policy wording has been amended as advised.</p>	<p>Yes</p>

Policy BG1: Local Green Space Designation / Development on Green Spaces (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Plymouth City Council Planning Department	BG1-PCC	Negative	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.	The policy wording has been amended as advised.	Yes
Plymouth City Council Planning Department	BG1-PCC	Negative	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.	The policy wording has been amended as advised.	Yes
Individual	BG1-1	Positive	The foreshore does not appear to be shown in green on the map	Map amended	Yes
Individual	BG1-2	Neutral	Green space should be left alone! And accessible as far as safe	Endorsement. No action required.	No
Individual	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.	Endorsement. No action required.	No
Individual	BG1-4	Positive	I use all of these spaces every day so wholeheartedly support protection of them!	Endorsement. No action required.	No

Policy BG1: Local Green Space Designation / Development on Green Spaces (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Individual	BG1-5	Positive	Agree	Endorsement. No action required.	No
Individual	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!	This site is privately owned and previously developed so outside the scope of the policy.	No
Individual	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.	Endorsement. No action required.	No
Individual	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.	Endorsement. No action required.	No
Individual	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.	Steering group agreed no action needed on policy in response to this comment. The intent section for this policy makes clear that all types of recreational amenity will be protected by the designation, not just the 'green' functions.	No
Individual	BG1-10	Positive	Fully support this, those green spaces are important to all who visit and live in the Hoe.	Endorsement. No action required.	No
Individual	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.	The policy paragraph describing the "provision of essential utility infrastructure" has been removed on PCC's advice. The reference to 10% BNG is in policy BG2.	Yes

Policy BG1: Local Green Space Designation / Development on Green Spaces (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Individual	BG1-12	Positive	Agree with Policy BG1	Endorsement. No action required.	No
Individual	BG1-13	Positive	Agree	Endorsement. No action required.	No
Individual	BG1-14	Positive	Agree with this policy but think that if a green space is to be developed for a valid reason than an area of equal size and quality should be identified, prior to the development, that can be returned to public 'green space' in order to retain the existing balance.	We are interpreting this as referencing 10% BNG	No
Individual	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).	This is a BG community aspiration (1a). By protecting the foreshore as a green space, we felt it would protect the public's access to the water.	No
Individual	BG1-16	Positive	I agree with everything mentioned in this policy, it reiterates what national and local policy already sets out but in a succinct and easy to understand way to ensure this is not overlooked on a local level.	Endorsement. No action required.	No
Individual	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.	Steering group agreed to do a review of potential housing windfall / allocation sites, including Elliot St/Citadel Rd, the Citadel itself, Grand Parade, etc.	No
Individual	BG1-18	PositiveWe 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.	This site is privately owned and previously developed, so outside the scope of the policy.	No

Policy BG2: Protection of Trees, Hedges and Biodiversity

				Dates Reviewed:	19/03/25	19/11/2025
				Reviewers:	PT, HK, CW, MW, MS, JB, BS, HJ	PT, BS, JB, MS
Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)	
Environment Agency SPDC	BG2-EA	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.	PT has discussed this with Chris Avent at PCC, who is leading on this work, and this plan now references the recent <i>Plymouth Plan for Nature and People</i> , which covers the LNRS.	Yes	
Environment Plymouth	BG2-EP	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.	PT has discussed with Jackie Young of EP and decided to include extensive references to the Plymouth Plan for Nature and People and biodiversity net gain.	Yes	
Plymouth City Council Planning Department	BG2-PCC	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.	Locality advises the following wording: In accordance with Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021) where possible developers should seek to provide 10% biodiversity net gains on sites developed within the Hoe Neighbourhood Area. Where on-site BNG cannot be achieved, developers should where possible provide the BNG on other appropriately registered sites in the Hoe Neighbourhood Area.	Yes	
Individual	BG2-1	Positive	agreed	Endorsement. No action required.	No	
Individual	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 some sway.	Endorsement. No action required.	No	

Policy BG2: Protection of Trees, Hedges and Biodiversity (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Individual	BG2-3	Positive	Trees should receive protection – no felling (except safety). More planting good	Added reviewing TPOs to the community aspirations	Yes
Individual	BG2-4	Positive	Yes.	Endorsement. No action required.	No
Individual	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.	This respondent is looking for more proactivity from HNF. Should join the group to contribute good ideas.	No
Individual	BG2-6	Negative	Seriously? Plymouth town centre has serious issues to address to arrest its decline and the problem isn't a lack of trees. How about enforcing a ban on cyclists in the city's biggest PEDESTRIAN area.	We've added a community aspiration in the PT section to work with authorities to reduce illegal, speeding e-Bikes, etc. Cross ref with PT1.	Yes
Individual	BG2-7	Positive	Super important.... What are they thinking by taking down the trees over by Lamphay Street???.... Far better to work around them as they form such a lovely canopy.	Endorsement. No action required.	No
Individual	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!	Added a community aspiration to audit all street trees in the HNA and review planning conditions to ensure planting took place and any dead trees replaced. PT to liaise with PTP on audit of street trees with volunteers.	Yes
Individual	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.	Endorsement. No action required.	No
Individual	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.	Endorsement. No action required.	No

Policy BG2: Protection of Trees, Hedges and Biodiversity (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Individual	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 .	We are aligned with city policy on increasing canopy cover. However, there is a need to ensure 'right tree, right place' so that people feel safe and benefits of trees can be demonstrated to be greater than negative aspects. Steering group reviewed and agreed we are aligned with local plan. Strategic ambition is 9% up to 15% (not double).	No
Individual	BG2-12	Positive	All vital for resident and migratory species.	Endorsement. No action required.	No
Individual	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) 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".	Steering group agreed to amend policy wording in line with suggestion.	Yes
Individual	BG2-14	Positive	Agree with Policy BG2	Endorsement. No action required.	No
Individual	BG2-15	Positive	Agree	Endorsement. No action required.	No

Policy BG2: Protection of Trees, Hedges and Biodiversity (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Individual	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.	Endorsement. No action required.	No
Individual	BG2-17	Mixed	Fully support this Policy and would add that areas of 'waste ground', undeveloped (derelict) 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.	Steering group agreed to review open spaces available and assess whether they are suitable for potential biodiversity pockets. Add new CA to utilise waste ground for supporting biodiversity.	Yes
Individual	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.	Suggested list of rare plants has been added in the background text for BG policies. Ww could work with this individual to get their support.	Yes
Individual	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.	Replacement of diseased and end-of-life trees is covered in Policy BG2 (2). The policy justification has been amended based on this and other comments about BNG requirements.	Yes
Individual	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.	Endorsement. No action required.	No

Policy BG3: Protection of Street Trees

				Dates Reviewed:	19/03/25	19/11/2025
				Reviewers:	PT, HK, CW, MW, MS, JB, BS, HJ	PT, BS, JB, MS
Organisation or Individual	Code	Stance	Comments	Steering group comments	Adjust Plan? (yes/no)	
Environment Agency SPDC	BG3-EA	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.	PT has discussed this with Chris Avent at PCC, who is leading on this work, and this plan now references the recent <i>Plymouth Plan for Nature and People</i> , which covers the LNRS. (same as BG2-EA)	Yes	
Environment Plymouth	BG3-EP	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.	There is an aspiration to work more closely with Environment Plymouth to protect and enhance the area's trees. PT has discussed with Jackie Young of EP and decided to include extensive references to the <i>Plymouth Plan for Nature and People</i> and its recommendations about trees.	Yes	
Plymouth City Council Planning Department	BG3-PCC	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.	Steering group agreed that consultation and local resident feedback broadly supports a local tree protection policy. Policy has been amended with suggested wording.	Yes	
Individual	BG3-1	Positive	agreed	Endorsement. No action required.	No	
Individual	BG3-2	Positive	Yes	Endorsement. No action required.	No	

Policy BG3: Protection of Street Trees (Continued)

Organisation or Individual	Code	Stance	Comments	Steering group comments	Adjust Plan? (yes/no)
Individual	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.	This comment goes against the stated aim to increase canopy cover across the city and particularly in areas like HNA, where it is particularly low.	No
Individual	BG3-4	Positive	Remove only if absolutely necessary.	Endorsement. No action required.	No
Individual	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”	Endorsement. No action required.	No
Individual	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.	Endorsement. No action required.	No
Individual	BG3-7	Negative	Taken from the most recent 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 .	Our wording is commensurate with 'Right Tree, Right Place'. Street tree planting currently calls for trees that do not produce sap and are suited to a street environment. This policy supports increasing canopy cover for all the benefits it provides to support safer highways, eg. cleaner air, absorbing surface water run-off. When balanced against leaf nuisance, these benefits outweigh and policy conforms to local plan. Wording reviewed with PTP. Issues with leaves etc can be address by street cleaning, not removal of trees.	No
Individual	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.	Endorsement. No action required.	No
Individual	BG3-9	Positive	Wholeheartedly agree with Policy BG3	Endorsement. No action required.	No
Individual	BG3-10	Positive	Agree	Endorsement. No action required.	No

Policy BG3: Protection of Street Trees (Continued)

Organisation or Individual	Code	Stance	Comments	Steering group comments	Adjust Plan? (yes/no)
Individual	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, in order to enhance the environment.	Endorsement. No action required.	No
Individual	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.	Wording of BG2 updated to include tree root protection zones. BG3 refers to BS 5837 (Trees in relation to construction).	Yes
Individual	BG3-13	Positive	It is important to minimise any impacts to street trees, which add distinctiveness and character to the Home Neighbourhood Area and benefit the health of residents and visitors alike.	Endorsement. No action required.	No
Individual	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.	Endorsement. No action required.	No

Policy PT1: Promoting Sustainable Mobility

				Dates Reviewed:	19/03/2025	15/11/2025
				Reviewers:	PT, HK, CW, MW, MS, JB, BS, HJ	PT, JB, MW, MS, ET
Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)	
Climate Action Plymouth	PT1-CAP	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.	Steering group discussed and agreed that: - existing policy wording covers cross-pavement chargers provided they meet the policy requirements; buses not within scope of neighbourhood planning powers; There was a related discussion about whether new EV infrastructure should be allowed to reduce the number of existing parking spaces. Decided to add to policy PT1 wording 'and provided new infrastructure doesn't involve unnecessary removal of existing parking spaces'. Steering group agreed HNF should query with PCC why the new EV spaces outside The Grand have taken over 3 spaces.	Yes	
Environment Plymouth	PT1-EP	Positive	This policy would be welcomed.	Supportive comment - No action required.	No	
National Highways	PT1-NH	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.	SRN = Strategic Road Network Comment seems to want the policy wording to say 'reduce the use of private cars'. Steering group felt that our existing wording was carefully chosen to reflect the balance of local opinion, especially known sensitivities around car ownership.	No	
Plymouth Civic Society	PT1-PCS	Negative	Given the central location of the Hoe we do not agree that new developments should include potential provision for parking.	This applies more to PT2 than PT1. Steering group felt that wording of PT2 has some flexibility for low parking provision provided the issue is addressed creatively through, for example, shared mobility schemes. No action required.	No	

Policy PT1: Promoting Sustainable Mobility (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Plymouth City Council Planning Department	PT1-PCC	Negative	<p>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.</p> <p>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:</p> <p>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:</p> <p>a) Prioritise walking, cycling, and public transport as the most favoured modes of transport;</p> <p>b) Reduce the use of cars, support zero emission electric vehicles, and / or shared mobility schemes.</p> <p>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.</p>	<p>Steering group debated the alternative policy wording and agreed to the following adjustment:</p> <p>"New development should be designed to reduce the reliance on cars and support a more sustainable local transport network."</p> <p>The suggested PCC wording was felt to be potentially inflammatory to known local concerns regarding parking pressures.</p>	Yes
Individual	PT1-1	Positive	agreed	Endorsement. No action required.	No
Individual	PT1-2	Mixed	A great plan however I would have loved it if you had advocated and implemented a pedestrianised Hoe front	HNF agree with the suggestion and have in the past put forward a proposal to trial a pedestrian take-over of Madeira Road. This suggestion, even as a one-off trial, was rejected by PCC and some local residents so has not been included in the neighbourhood plan. HNF to suggest to PWP to test the water for wider support.	No
Individual	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.	Outside the scope of Neighbourhood Plan but HNF will feed this back to the Hoe Events Team to see whether this suggestion can be incorporated into Hoe hire agreements/bonds. Issue to be raised at HNF meeting	No
Individual	PT1-4	Positive	Prioritise walking, cycling, public transport. Car-free streets, OK. Electric charging points, yes.	Steering group discussed. Seems to be a broadly supportive comment - No action required.	No

Policy PT1: Promoting Sustainable Mobility (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Individual	PT1-5	Positive	I fully support this strategy. However, I wonder if there is something in this document that recognises that we need to reduce our dependency on one or more car(s) per household.	Steering group discussed. Community Aspiration includes a proposal to 'review management of parking permits and parking areas and costing mechanisms to ensure fair distribution'. Added words to include option to disincentivise multi-car households.	Yes
Individual	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 adequate for residents going to work, or for people working in the Forum area.	Steering group reviewed and agreed with the sentiment, but buses outside the scope of plan policy. Community aspiration is included to liaise with bus provider for improved service.	No
Individual	PT1-7	Positive	OK. I'd have liked to see something about car sharing schemes etc.	Steering group reviewed and felt that this is covered in PT2 - support for shared mobility schemes.	No
Individual	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?	HNF agree with the suggestion and have in the past put forward a proposal to trial a pedestrian take-over of Madeira Road. This suggestion, even as a one-off trial, was rejected by PCC and some local residents so has not been included in the neighbourhood plan. HNF to suggest to PWP to test the water for wider support.	No
Individual	PT1-9	Negative	In Devon cars are essential to getting around (unlike say London). In Plymouth pedestrians should be protected from cyclists who aggressively 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 expensive cycle lanes invariably empty. Stop wasting the majority's money on anti social cyclists.	Whilst there are anti-social, and illegally ridden cycles, policing and education are required. Steering group reviewed and acknowledge the issue of irresponsible cyclists. HNF have raised speeding cyclists repeatedly at Forum meetings with Ward Councillors and will continue to do so. New Community Aspiration to be added to 'Work with PCC to look for ways to enhance the safety of pedestrians and cyclists, introducing measures where practical to achieve their separation.'	Yes
Individual	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.	Noted. No action required.	No

Policy PT1: Promoting Sustainable Mobility (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Individual	PT1-11	Positive	I support the plan to promote walking and cycling in the Hoe area, especially 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 are 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.	Steering group reviewed and acknowledged the need for more safe crossing points. Add to Community Aspiration no. 1 'Work with Local Authority to improve pedestrian safety and support for more safe crossing points'.	Yes
Individual	PT1-12	Neutral	Major development proposals should be supported with a traffic plan AND SUITABLE, ADEQUATE PROVISION OF PARKING (which is already difficult)	Steering group agreed and believe this is covered by policy PT2.	No
Individual	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.	Endorsement. No action required.	No
Individual	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 recognise 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.	Steering group agreed and believe this is covered by policy PT2.	No
Individual	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 whether 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.	Steering group agreed a new Community Aspiration to monitor the performance of 20mph zones elsewhere in the city to see whether their benefits could be brought to the Hoe.	Yes
Individual	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	HNF understand that a proposal for EV points for ice cream vans is in progress. HNF are supporting this initiative. Suggestion for signage and historical info is supported - this is reflected in Community Aspirations	No

Policy PT1: Promoting Sustainable Mobility (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Individual	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	HNF agree with the suggestion and have in the past put forward a proposal to trial a pedestrian take-over of Madeira Road. This suggestion, even as a one-off trial, was rejected by PCC and some local residents so has not been included in the neighbourhood plan. HNF to suggest to PWP to test the water for wider support.	No
Individual	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.	As with PT1-9, Steering group reviewed and acknowledge the issue of irresponsible cyclists. HNF have raised speeding cyclists repeatedly at Forum meetings with Ward Councillors and will continue to do so. New Community Aspiration to be added to 'Work with PCC to look for ways to enhance the safety of pedestrians and cyclists, introducing measures where practical to achieve their separation.'	No
Individual	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.	As with PT1-CAP, there was a discussion about whether new EV infrastructure should be allowed to reduce the number of existing parking spaces.	No
Individual	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.	Noted. No action required.	No
Individual	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!	Noted. HNF have lobbied for better bus services and this is reflected in Community Aspirations.	No

Policy PT2: Parking

			Dates Reviewed:	19/03/2025	15/11/2025
			Reviewers:	PT, HK, CW, MW, MS, JB, BS, HJ	PT, JB, MW, MS, ET
Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Environment Plymouth	PT2-EP	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 proximity 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 ?	PT discussed with Environment Plymouth to check that our proposed adjustments addressed their concerns.	No
Plymouth City Council Planning Department	PT2-PCC	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. 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.	Steering group debated the alternative policy wording and agreed to adopt PCC wording for point i. and ii. but not iii. - as with PT1, the suggested PCC reference to 'car free development' was felt to go against known local concerns regarding parking pressures.	Yes
Individual	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.	Noted.	No
Individual	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.	Steering group agreed to add to including meeting the needs of people with mobility issues' to the second line of PT2.	Yes
Individual	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.	Noted. No action required.	No

Policy PT2: Parking (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Individual	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?	Steering group agreed to delete 'new dwellings' from the policy wording. PT sub-group did propose improving transport links for events, however, this could not be covered by policy and is now reflected in Community Aspirations. Most major events now include promotion of Park & Ride. Bring up at a HNF meeting the possibility of special short-term parking spaces for business areas	Yes
Individual	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 signaling.	We acknowledge the consultee's concerns, but believe the policies as written achieve a balance between a wide range of local views.	No
Individual	PT2-6	Positive	Agreed. I rarely use my car, but sufficient parking is important.	Noted. No action required.	No
Individual	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.	Steering group agreed to change the words on Community Aspiration 2f to add Lockyer Street	Yes
Individual	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.	Noted. No action required.	No
Individual	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.	Noted. No action required.	No
Individual	PT2-10	Positive	Important not to loose Parking bays.	Noted. No action required.	No
Individual	PT2-11	Positive	Agree with Policy PT2	Noted. No action required.	No
Individual	PT2-12	Positive	I agree that new developments need to factor in adequate parking for those residing in said dwellings.	Noted. No action required.	No

Policy PT2: Parking (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Individual	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.	Noted. No action. We believe there may now be a Co Wheels bay at Ballard House.	No
Individual	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'.	Steering group reviewed the sentence referred to by the consultee and agreed to make it clearer, though this line has been moved to the PT1 justification.	Yes
Individual	PT2-15	Positive	Hi everyone, We're XXX & YYY 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.	Noted. PCC plans to install electric hookups and may be in the process of doing this (April 2025)	No

Policy HS1: Housing Mix, Accessibility and Environmental Standard

Dates Reviewed:	16/04/2025	18/11/2025
Reviewers:	PT, MW, CW, KS, JB, MS, HJ	PT, JB, HK, MW, MS

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Environment Plymouth	HS1-EP	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.	We cannot be in conflict with the JLP, but we are able to be more detailed. We acknowledge the reference and accept that a policy should refer to housing assessment/ built environment / spatial environment. We considered adding that "conversions should meet energy performance certificate (EPC) rating of band 'C' or better, where possible" but... Locality says: EPC are not directly a planning issue. Would need to amend the policy to require development to meet low-carbon targets and best practice building regulations energy performance requirements. Added "best practice" to policy wording	Yes
Historic England	HS1-HE	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.	The steering committee believes that our policy does add value and should remain.	No

Policy HS1: Housing Mix, Accessibility and Environmental Standard (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Plymouth City Council Planning Department	HS1-PCC	Negative	<p>We are pleased to note that our recommendation to remove reference to Future Homes Standard has been done.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Suggested Wording: Policy HS1 – Housing mix and accessibility</p> <p>i. Proposals for more than five dwellings should demonstrate how the applicant has sought to meet locally assessed tenure needs</p> <p>ii. Proposals for a mix of housing sizes and which seeks to provide suitably designed homes for families and older people will be supported.</p> <p>iii. Proposals for the conversion of flats back to family homes will be supported.</p> <p>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.</p> <p>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.</p>	<p>We should keep reference to Hoe HNA which gives added detail for our own neighbourhood. This is the whole point of writing a neighbourhood plan.</p> <p>Having debated this, we agreed that we would keep our paragraph 1 and its reference to Housing Needs Assessment as an introductory paragraph. We would then adopt PCC’s paragraphs 2,3,4. Change wording (NB: also changed by other comments) to read:</p> <p>Proposals for more than five dwellings should demonstrate how the applicant has sought to meet locally assessed needs as identified in The Hoe Housing Needs Assessment. Specifically, the Hoe Neighbourhood Forum will support proposals for:</p> <ol style="list-style-type: none"> 1. A mix of housing sizes (including one-, two-, three- and four-bedroom units) and tenures (including affordable rent and intermediate home ownership) that seek to provide suitably designed homes for singles, various types of families, and older people 2. The conversion of flats back to family homes . 3. Developments that exceed the “accessible and adaptable dwellings” requirements in the Building Regulations Part M4(2) to meet the lifetime needs of residents 4. New developments and conversions that meet or exceed low carbon targets and best practice energy performance requirements 	Yes

Policy HS1: Housing Mix, Accessibility and Environmental Standard (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Individual	HS1-1	Positive	4. To address the needs of younger families... what are examples of 'housing specifically designed to address their needs'?	Agree that what is the description of younger family needs to be changed to "various types of families"	Yes
Individual	HS1-2	Mixed	No new housing in this area – only social – family housing	Noted, but this would be too restrictive and does not accord with our HNA.	No
Individual	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 existing dwellings, but because of the high proportion of flats, such applications are virtually guaranteed acceptance, and so circumvent the intention to protect residential areas.	Added more detail about HMOs in justification. There is a community aspiration to work with PCC to see if a more suitable approach to HMO can be found.	Yes
Individual	HS1-4	Positive	Great that the Forum has its own commissioned Housing Survey. Good work and some precise and sensible points made here.	Endorsement. No action required.	No
Individual	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?	Good question, not sure where five came from. We took out that qualification. Air B&B is a national issue and is not something we can influence under planning policy. Covered under Community Aspirations	Yes
Individual	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.	Endorsement. No action required.	No
Individual	HS1-7	Positive	Proposals should include designated infrastructure to support the changing demographics and health: education/ social/ welfare needs	This is a PCC city-wide issue and is outside our remit. This is not something that we can influence via our plan.	No
Individual	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.	Endorsement. No action required.	No
Individual	HS1-9	Positive	Wholeheartedly agree to Policy HS1	Endorsement. No action required.	No
Individual	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.	Endorsement. No action required.	No
Individual	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.	Endorsement. No action required.	No

Policy HS1: Housing Mix, Accessibility and Environmental Standard (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Individual	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.	Re write as: The Housing Needs Assessment data shows that the Hoe Neighbourhood Area's existing housing stock has more than double the percentage of flats than Plymouth or England as a whole. Many of the large terraced houses in the Hoe Neighbourhood Area have been converted into flats, and 88% of all dwellings in the area have just one or two bedrooms. There is a marked need for more three- or four-bedroom dwellings that would meet the needs of families and other multi-generational households.	Yes
Individual	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?	We believe that there are already too many one- or two-bed flats, suitable for single people -- 87.7% of all dwellings. The Plan does consider the needs of single people, including older people.	No

Policy HS2: Housing Site, Former Register Office (Policy HS2 has been deleted from the plan)

			Dates Reviewed:		16/04/2025	28/11/2025
			Reviewers:		PT, MW, CW, KS, JB, MS, HJ	PT, JB, MW, HK, DC
Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)	
Environment Agency SPDC	HS2-EA	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.	Noted	No	
Environment Plymouth	HS2-EP	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.	Noted	No	
Historic England	HS2-HE	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.	The committee disagrees with the assumption that heritage assets near the Register Office already have adequate protection by virtue of being allocated in the JLP. We do not propose any change to the wording of the HNP.	No	
Plymouth Architectural Trust	HS2-PAT	Positive	The Plymouth Architectural Trust strongly supports this policy.	Endorsement. No action required.	No	

Policy HS2: Housing Site, Former Register Office (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Plymouth City Council Planning Department	HS2-PCC	Negative	<p>As previously advised in September 2023 we recommend that you delete this policy.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>We have accepted PCC's advice and deleted this policy. PLY27 has been sold since the previous draft of this plan. We believe that Hoe Park Heights Ltd, the developer, will duly take account of pre-application advice and opinion prior to submitting an application for planning consent. Given the similarities with the feasibility work completed by Hoe Neighbourhood Forum and given that the Hoe Neighbourhood Development Plan cannot take a position that is not in conformity with strategic policies of the Plymouth and South West Devon Joint Local Plan, policy HS2 has been deleted from the Hoe Neighbourhood Development Plan submitted to Plymouth City Council for Regulation 15 review.</p>	Yes

Policy HS2: Housing Site, Former Register Office (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Plymouth City Council Planning Department	HS2-PCC	Negative	<p>We object to the policy prescribing specific building heights.</p> <p>The Forum argued for a restriction on the building height at the 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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>PLY27 as drafted has sufficient flexibility to allow for community uses as part of its active ground floor frontage provision.</p> <p>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’.</p> <p>They also recommended at this stage that reference to the register office be deleted because PCC has already relocated the Register Office.</p> <p>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’.</p>	See above	Yes

Policy HS2: Housing Site, Former Register Office (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Plymouth City Council Planning Department	HS2-PCC	Negative	<p>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:</p> <p>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.</p> <p>Link: https://www.gov.uk/guidance/neighbourhood-planning--2#contents</p> <p>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.</p> <p>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.</p>	See above	Yes
Individual	HS2-1	Positive	Can these aspirations be applied to any future development of the site as it has now been purchased?	Yes, they can.	No
Individual	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.	Endorsement. No action required.	No
Individual	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.	The number of units in this development are key to making the site's development financially feasible, and we cannot justify reducing it further.	No
Individual	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.	Endorsement. No action required.	No
Individual	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. Development 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 focusing on this heritage site.	Noted	No

Policy HS2: Housing Site, Former Register Office (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Individual	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.	Endorsement. No action required.	No
Individual	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!	Noted	No
Individual	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..	Noted	No
Individual	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.	Endorsement. No action required.	No
Individual	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.	Endorsement. No action required.	No
Individual	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.	Endorsement. No action required.	No
Individual	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.	Noted	No
Individual	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.	Endorsement. No action required.	No

Policy HS2: Housing Site, Former Register Office (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Individual	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 Lockyer Street villas so that a visual congruity can be maintained.	Endorsement. No action required.	No
Individual	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.	Noted	No
Individual	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.	Endorsement. No action required.	No
Individual	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).	Endorsement. No action required.	No
Individual	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.	Endorsement. No action required.	No
Individual	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.	Noted	No

Policy DC1: Developer Contributions

Dates Reviewed:	16/04/25	18/11/25
Reviewers:	PT, CW, MW, HK, MS, JS, BS	PT, JB, HK, MW, MS

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Environment Plymouth	DC1-EP	Mixed	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>Steering group reviewed collectively. All agreed that, given the level of support from all except PCC, we should continue to stand by policy DC1.</p> <p>Locality recommends the following: In areas where there is a Neighbourhood Development Plan in place that has been through a successful referendum and has been agreed as part of planning policy or 'made' by the local authority 25% of the CIL collected from development within the Neighbourhood area is available and elsewhere it is 15%. In areas that have parish/town councils these funds are paid directly to Parishes. In areas without parish or town councils, the Neighbourhood Portion is retained by the local authority and should be spent locally, following consultation with the community. So setting out a policy which makes it clear where the Hoe Forum would wish to see CIL spent is entirely appropriate, have a look at the Made NDP for Fortune Green - https://www.camden.gov.uk/fortune-green-and-west-hampstead-neighbourhood-forum</p> <p>See policy 19.</p>	Yes
Plymouth City Council Planning Department	DC1-PCC	Negative	<p>As a result our recommendations are that the policy should be deleted for the reasons set out below</p> <p>DC1 (i) should be deleted.</p> <p>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).</p> <p>DC1 (ii) a) should be deleted as policy but could be included in a list of infrastructure priorities relevant to negotiation of planning obligations.</p> <p>DC1 (ii) b) should be: deleted, or; put into a separate planning policy related to the applications that include the creation of movement routes.</p> <p>DC1 (ii) c) should be deleted as policy but could be included in a list of infrastructure priorities relevant to negotiation of planning obligations.</p> <p>Should you wish to retain reference priorities for infrastructure projects, we advise that this is done as a Neighbourhood aspiration rather than a policy.</p>	As above	

Policy DC1: Developer Contributions (Continued)

Organisation or Individual	Code	Stance	Comments	Review Comments/Recommendations	Adjust Plan? (yes/no)
Individual	DC1-1	Positive	Very important	Endorsement. No action required.	No
Individual	DC1-2	Positive	Maximum social awareness; financial contributions must be part of all development	Endorsement. No action required.	No
Individual	DC1-3	Positive	Clear and sensible.	Endorsement. No action required.	No
Individual	DC1-4	Positive	Well thought out, but I am personally happy with what is here now.	Endorsement. No action required.	No
Individual	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.	Endorsement. No action required.	No
Individual	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.	Endorsement. No action required.	No
Individual	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}.	Endorsement. No action required.	No
Individual	DC1-8	Positive	Agree with Policy DC1	Endorsement. No action required.	No
Individual	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 development.	Endorsement. No action required.	No
Individual	DC1-10	Positive	Fully support this Policy and see this as perfectly 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 infrastructure in the area. The Hoe Neighbourhood Forum have been given a mandate by the Hoe community to play a pivotal role in these decisions.	Endorsement. No action required.	No
Individual	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.	Endorsement. No action required.	No