



Appeal Decision

Hearing Held on 8 March 2022

Site visit made on 8 March 2022

by David Wyborn BSc(Hons) MPhil MRTPI

an Inspector appointed by the Secretary of State

Decision date: 06 April 2022

Appeal Ref: APP/N1160/W/19/3228647

Land off Colesdown Hill, Plymouth, Devon

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Ms Lacey Keating against the decision of Plymouth City Council.
 - The application Ref 18/00649/FUL, dated 8 April 2018, was refused by notice dated 14 November 2018.
 - The development proposed is the change of use of the land to a private gypsy and traveller caravan site consisting of 2 no. mobile homes, car parking and associated development.
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Decision

1. The appeal is dismissed.

Application for costs

2. An application for costs was made by Plymouth City Council against Ms Lacey Keating. This application is the subject of a separate Decision.

Preliminary Matters

3. The application was refused for two reasons. At the appeal stage further information was submitted to seek to address the second reason for refusal. The Council is satisfied that the information on the potential contamination of the land would, with an appropriately worded planning condition in any approval, address that element of the second reason for refusal. Based on the evidence before me, I have found no reason to disagree.
4. However, the Council still raise objection regarding the potential ecological impacts of the development. This element of the second reason for refusal is still a matter of disagreement between the main parties and this forms a main issue in this appeal.
5. Since the refusal of the application, the Council has adopted, in March 2019, the Plymouth and South West Devon Joint Local Plan 2014-2034 (JLP). This forms the development plan for the area and the main parties have been able to make comments on the implications of the JLP for the appeal proposal.
6. The evidence indicates that the appellant and the other proposed occupiers of the site are Romany Gypsies and have a nomadic way of life, travelling for work. I am satisfied that they meet the definition of a Gypsy and Traveller as set out in Annex 1 of the Planning Policy for Traveller Sites (the PPTS).

Main Issues

7. In the light of the above, the main issues are:

- whether or not the proposal would result in development that would unacceptably conflict with the functions or characteristic of the site as part of a Strategic Green Space, with particular regard to the occupation of the site for residential purposes and any resulting activity,
- the effect of the proposal on the biodiversity of the site, and
- whether, if the proposal would not accord with the development plan when considered as a whole, material considerations indicate a decision should be made otherwise.

Reasons

Whether or not the proposal would result in development that would unacceptably conflict with the functions or characteristic of the site as part of a Strategic Green Space

8. To the east of the estuary, the JLP includes proposals for substantial housing development in the form of the new communities of Sherford and Saltram Meadow/Plymstock. As part of this strategy, and to assist with providing recreational and open areas for the growing population, is the continuation of the designation of a large area of green space known as the Saltram Countryside Park Strategic Green Space. This Strategic Green Space covers an extensive area centred around the Saltram House, Gardens and Parkland. The wider designated area is predominantly open countryside and woodland, including land to the north of the A38. Within this overall area there are also connecting roads and some residential and commercial properties, including the Gypsy and Traveller sites at The Ride and off Ridge Road. The Countryside Park is therefore predominantly open and undeveloped but there is a fairly wide range of sporadic development that forms part of its character and range of activities.
9. Policy DEV27 of the JLP sets out the approach to the protection and support for green and play spaces and this includes the policy test that development that would result in an unacceptable conflict with the function(s) or characteristic of Strategic Green Spaces will be resisted. This criterion goes on to explain that in these Strategic Green Spaces development will normally only be permitted where it enhances the value of the green space and gives the examples of sports, allotment and play provision, lighting, cafes, educational uses and sustainable transport routes.
10. Particular objectives and associated projects for the Saltram Countryside Park Strategic Green Space are detailed in Policy PLY54 of the JLP. This policy explains that the Saltram Countryside Park will provide a regionally significant recreational resource on the eastern edge of Plymouth in a manner that is sensitive to, and enhances, the area's exceptional biodiversity, landscape, historic assets and productive farmland. The policy reflects the details established in the Saltram Countryside Park – Masterplan Report – May 2011 (the Masterplan).
11. Policy PLY54 of the JLP therefore complements and provides the context in which proposals within the Saltram Countryside Park Strategic Green Space should be assessed when applying Policy DEV27.

12. The appeal site is part of a fairly modest sized and irregular shaped field within the designated Saltram Countryside Park Strategic Green Space. The site lies adjoining Colesdown Hill and is generally surrounded by established hedges and/or treed boundaries. There are partial views into parts of the field through the access gates and through parts of the boundary vegetation from the road.
13. The quarry to the broadly south is well screened from the site by a belt of trees. To the very broadly north of the site, on both sides of the road, the land consists of grazing fields bounded by hedges and trees. However, to the broadly south west of the red lined site, on the other side of the road, is a gas distribution centre, which contains hardstanding and some buildings behind its reasonably well landscaped boundaries.
14. Further down the road, is a grouping of commercial buildings of which some are reasonably tall and prominent when viewed from parts of Colesdown Hill. This commercial site can only be accessed from the north east as there is a barrier preventing vehicles from linking with the south west section of Colesdown Hill. While only a snap shot in time, when I visited the site there did appear to be a reasonably regular flow of individual vehicles, often vans, which were travelling to and from the commercial buildings. Representations from some local residents highlight that the road is busy. I also saw the vehicles parked along the road side in the vicinity of the commercial site which I assumed were mainly the vehicles of workers on the commercial site and I have no reason to believe that this parking was not typical of other occasions. As a consequence, the appeal site, while in a rural area, is also influenced by the commercial surroundings and the traffic on the road.
15. The appeal development, which includes two mobile homes, access drive, hardstanding and parking for vehicles, would be located in a mainly north eastern section of the field. A comprehensive landscaping scheme is proposed which would strengthen the boundary planting, including with a belt of landscaping within part of the site parallel with the road and within the broadly northern section of the site. The metal gates would be replaced by timber gates set back into the site. A scheme for any external lighting of the site could be the subject of a planning condition in any approval to ensure that the lighting was sympathetic to the site and area. As a result, the proposed development, once the landscaping had matured, would in all likelihood, only be able to be glimpsed through the boundary screening from the road and in wider views. Consequently, the development would not be especially noticeable.
16. Furthermore, even those glimpsed views of the residential presence on the site that may be possible would be experienced in the general context of the gas distribution centre and the nearby commercial site with the associated vehicle parking. With these general surroundings associated with this site and the modest scale of the proposal and comprehensive landscaping scheme, the proposed development would not cause any material visual harm to the character and appearance of the area. Also, given the level of existing traffic movements along this section of Colesdown Hill, the comings and goings associated with a two pitch Gypsy site would not be especially impactful and would also not cause harm to the character and appearance of the area. Furthermore, I consider that there would be no material harm from the proposed use and the related activity to the sustainable transport routes proposed for the Countryside Park.

17. Notwithstanding that no undue visual harm to the area would be caused, the Masterplan Report seeks to conserve and enhance the attractive pattern of fields, hedgerows and woodlands in the wider farmed area and that new interventions should complement and enhance the diverse landscape character of the area.
18. I appreciate that the wording of DEV27 of the JLP indicates that development will *normally* (my emphasis) only be permitted where it enhances the value of the green space. This wording could allow some discretion in the consideration of proposals. However, the appeal site is a green field that is similar to others in the locality and there are not such particular circumstances that would merit anything other than an application of the normal policy approach for an alternative land use within a Strategic Green Space. In these circumstances, the introduction of the residential use on land which is typical of the field pattern within the landscape would result in the loss of a section of grass land and not enhance its value as a green space. In this way the scheme would conflict with the function and characteristic of this part of the Strategic Green Space. In the circumstances I consider that this conflict, because of the typical nature of the appeal site, would be unacceptable. Policy DEV27 of the JLP indicates that in these circumstances the proposal should be resisted.
19. I have identified a conflict with the policy approach to development in this Strategic Green Space. However, I am also conscious that the designation covers an extensive area and the examples of other planning decisions in Green Spaces, including appeal decisions, that the Council has drawn to my attention lead to the impression that it has consistently refused types of development other than those strictly within the categories mentioned as examples in Policy DEV27 of the JLP. Such an approach would effectively prevent the provision of Gypsy and Traveller sites across much of this area, with limited regard to the particular circumstances and where there are already local Gypsy families residing.
20. Given this situation, and having particular regard to the large size of the Strategic Green Space and the limited size of the proposal on this private land which has no public access, together that the proposal would have no material impact on the recreational function of the area and an acceptable visual effect, I consider that the harm to the policy requirements for the Strategic Green Space would be modest in its effect. Nevertheless, even though there would be a modest adverse effect there would still be a policy conflict and therefore I conclude that the scheme would not comply with Policies DEV27 and PLY54 of the JLP which set the approach to development within Strategic Green Spaces.
21. For the avoidance of doubt I do not consider that criteria 2, 3 and 4 of Policy DEV27 of the JLP would apply to the appeal proposal within this Strategic Green Space. These criteria are not directly relevant to the appeal proposal including because they apply requirements to play space as well as open space and, in part, refer to the accessibility of the space which would not appear to apply to this private land. I have come to this view after hearing the evidence and taking into account the guidance in the Plymouth and South West Devon Joint Local Plan 2014-2034 Supplementary Planning Document (adopted June 2020 by Plymouth City Council).

Biodiversity

22. The Masterplan explains that the Countryside Park includes a variety of nationally and regionally important habitats including, parkland, ancient species-rich hedgerows and ancient woodland. It is also explained that there is a presence of European protected species such as bats, including a nationally important brown long-eared maternity roost¹. Policy PLY54 of the JLP refers to the area's exceptional biodiversity.
23. The appeal site falls within the Countryside Park and, while it does not have a formal ecological designation itself², the site is surrounded and links with a wider field system with connecting tree and hedgerow boundaries. There is, in principle, a reasonable likelihood that the site is important for biodiversity and that this could be affected by the proposed development.
24. The application was not accompanied by a detailed ecological report and this led to the associated reason for refusal. At the appeal stage an Ecological Appraisal was submitted, and this included an analysis following a walkover survey of the site which took place in November 2018. The Appraisal identifies that a number of bat species have been documented across the wider area. No protected species surveys in respect of bats were undertaken as part of this Appraisal and the Council raise concerns with some of the approach and details of the Appraisal. In any case, as the Appraisal is more than three years old I consider that its findings and the recommendations can now only be attributed limited weight.
25. The appellant has commissioned a more recent Report³ and I accept that because of the timings it could not include protected species surveys in respect of bat activity because they could not be undertaken at an appropriate time of the year. The report includes an assessment of the likely commuting and foraging use of the site by bats. The ecologist also identified a cavity, within a tree along the northern boundary, that had the potential to be a roost feature suitable for bats.
26. The appellant has explained in detail how the evidence provided by the two ecological reports and the recommended planning conditions should allow reassurance that the use of the site by bats could be successfully accommodated without any undue harm or disturbance. I understand that the size of the site could allow adjustments to the layout with the ability to provide generous areas of landscaping, dark areas and buffer zones together with a detailed lighting scheme. However, I am also conscious that at this stage, without the necessary bat surveys, it is not conclusive as to whether there is a roost on the site and/or how bats commute and forage in this area.
27. The layout of the site, and indeed the red lined site area within the wider field, have not been identified and designed based on the knowledge from surveys of how bats use the site. It would seem to me that by considering the approach to allow the detailed survey work after the grant of planning permission, and then seeking the potential to alter the layout and adjust the landscaping scheme according to the then information, that effectively the scheme would be retrofitted to try to accommodate any bat activity and presence. While this

¹ Page 14 of The Masterplan

² The Council explain that the site is to form part of a future JLP core biodiversity Network feature.

³ Colesdown Hill, Plymouth – Ecological Impact Assessment – March 2022 – Pro Vision

could be possible, given that bats are a protected species, I am not satisfied that I have enough clear and detailed evidence to assess any potential negative effects on this protected species. Consequently, I am not sufficiently reassured that the scheme could be amended within the red lined area in all the potential circumstances to avoid any identified harm.

28. I am conscious of the advice in Circular 06/2005⁴ that it is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision. The policy advice is that the need to ensure ecological surveys are carried out should therefore only be left to coverage under planning conditions in exceptional circumstances. Similar advice is contained within the document Protected Species and Development: Advice for Local Planning Authorities⁵.
29. To conclude, I consider that there is a reasonable likelihood of bats using the appeal site and that potentially a roost for bats may be present and, therefore, that bats could be affected by the development. I am not satisfied that there are exceptional circumstances that would warrant the necessary ecological surveys being undertaken after the grant of planning permission. Without such surveys, and the clear reassurance that the existing or potential rearranged layout could accommodate bats without undue harm, I am not satisfied that the scheme would acceptably address the likely presence of a protected species. Accordingly, the scheme would be unacceptable in this respect.
30. I have noted the other biodiversity concerns of the Council, including the loss of the grass land and that the scheme does not provide sufficient biodiversity net gain. The loss of an area of grass land is a consequence of the proposal. However, in terms of the potential net gain from the scheme which may also compensate for the loss of the grass land, the site would provide generous areas for landscaping and I am satisfied that this detail could be worked up further to meet the policy requirements in this respect.
31. Drawing all these matters together, I conclude that the evidence does not satisfactorily demonstrate that the scheme would have an acceptable effect on the biodiversity of the site, in particular in respect of bats. Accordingly, the proposed development would not accord with Policy DEV26 of the JLP and the National Planning Policy Framework (the Framework) which seek, amongst other things, that development should support the protection, conservation, enhancement and restoration of biodiversity across the JLP area.

Other Matters

32. Representations have been submitted including both objecting to and in support of the proposal. In respect of the supporting comments, I have taken into account the argued benefits of a private Gypsy and Traveller site in this location which it is said would have no adverse impact and help deliver some of the required pitches.
33. On the other hand, there are quite a large number of objections which I have also taken into account. In terms of a main objection, in particular, I have

⁴ Biodiversity And Geological Conservation – Statutory Obligations And Their Impact Within The Planning System ODPM – 16 August 2005

⁵ Published by Natural England and DEFRA

noted the concerns raised regarding highway safety issues. However, these objections have not been supported by the Highway Authority, they do not form a reason for refusal and I have found no reason to disagree with the conclusions of the Council on this matter.

34. I have also noted the concerns raised in respect of an unauthorised Gypsy encampment which took place in the past on land nearby. However that is not the same situation as with the present site which is intended as a private site for two pitches and where no unauthorised development has taken place.
35. Furthermore, I am satisfied that the occupation of the site for a two pitch Gypsy and Traveller site, because of its position and the scale of the use and activities, would not cause a material or adverse effect on the amenities or operation of any nearby residential or commercial property or site.
36. To the west of the appeal site is Wixenford Farmhouse, a Grade II Listed Building and to the north is Saltram House Grade II* Registered Park and Garden. Because of the scale and impact of the proposal, and the separation of the site from these designated heritage assets, there would be no adverse effect on their setting or significance.

Other Material Considerations

37. Planning law requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise. A number of other material planning issues have been raised and which require consideration within the overall planning balance.
38. Policy DEV13 of the JLP sets out the approach to the consideration of Gypsy and Traveller sites across the plan area. It is a criteria based policy and it is common ground between the main parties that the appeal proposal would accord with the policy approach. Accordingly, it can be concluded that the scheme would contribute to the creation of a sustainable linked neighbourhood or sustainable rural community. Furthermore, the proposal would meet the policy criterion that the site would be located near to existing settlements and with a scale of development that would not dominate the nearest settled community and would avoid placing undue pressure on the local infrastructure. The site would provide good on-site facilities for parking, storage, play and residential amenity. The comprehensive landscaping scheme would be sensitive to the location without enclosing the site with hard landscaping and would help to promote healthy lifestyles for future occupants.
39. These would all be positive aspects of the scheme and the accommodation would also accord with the policy requirements of the PPTS to promote more private sites. I attribute these benefits, because of the scale of the scheme, moderate weight in support of approval.
40. In terms of pitch delivery and supply, historically the evidence indicates that the then emerging Regional Spatial Strategy set a requirement of 40 pitches for the period 2006-2011 for the Plymouth area and the Plymouth Core Strategy established a need for 50 additional pitches between 2006 to 2021. However, these plan documents have been revoked or superseded. Subsequently, the revised PPTS was published in 2015 and this altered the definition of a Gypsy and Traveller for planning purposes. To inform the emerging Joint Local Plan, the Plymouth, South Hams and West Devon Gypsy,

Traveller and Travelling Showpeople Accommodation Assessment (December 2016) (the Accommodation Assessment) was commissioned and this document is the latest available needs assessment. The Accommodation Assessment concludes that there is a need for one Gypsy and Traveller pitch in the period up to 2031 and that this pitch is needed in the period 2026-2031.

41. The evidence indicates that only four pitches have been permitted since about 2010 and these were all approved at about that time, notwithstanding the higher number of pitches that the earlier plans sought. There is, therefore, in my view an apparent disconnect between the earlier plan requirements for Gypsy and Traveller pitches and the Accommodation Assessment numbers. I do not consider that this can all be accounted for by the change in the definition of a Gypsy and Traveller and the figures in past documents help to provide the historical context for pitch requirements. Furthermore, the appellant makes criticisms of the Accommodation Assessment including the way that it appears to exclude those attending horse fairs from the figures, when it has been accepted that this would usually be considered to be travel for an economic purpose.
42. I am also conscious that when the application was first submitted there were 13 households on the waiting list for the Council pitches at The Ride. The latest information is that there is now 8 households on the waiting list. Additionally, the appeal proposal shows that there are two couples in need of pitches and they can be considered concealed households on existing sites (with one person in bricks and mortar housing). This information on need does not appear to be reflected in the assessment figures. However, I do acknowledge there was assessment at the Local Plan Inquiry where the criteria based policy approach of Policy DEV13 of the JLP, with no pitch requirements identified in the policy, was found to be sound.
43. The Council make the case that, other than the appeal proposal, it has not received any other application in recent years for a Gypsy and Traveller pitch, which would now be considered against the criteria based policy of DEV13 of the JLP. On the other hand, the Accommodation Assessment is now more than five years old and the Council do not have a more up-to-date assessment of need. On the balance of all the information, there appears to be a general unmet need for further pitches in the Plymouth area and, in any case, there is certainly an unmet need for two pitches as evidenced by the intended occupiers of the appeal site. The Council accept the need for the pitches for the proposed occupants in this case. Taking all these matters together, I consider that the unmet need for Gypsy and Traveller pitches, particularly including for the proposed occupants, should afford significant weight.
44. The appellant argues that there has been a failure of policy to deliver the necessary Gypsy and Traveller pitches. I have already commented on an apparent disconnect between earlier pitch requirement figures and the JLP approach. However, the JLP is an up-to-date plan that has been the subject of detailed consideration at the Local Plan Inquiry. Policy DEV13 of the JLP was found sound and this does not require the delivery of any pitches in the present five year period. The Council argue that there is therefore an up-to-date five year supply of sites because the supply requirements are zero (and the criteria based approach can allow consideration of any pitches that are promoted). While this may be considered a narrow interpretation of the situation, based on the implementation of the adopted policy approach, I am unable to conclude

that there is now a failure of this adopted policy. As a consequence, the arguments that there has been a failure of policy attracts limited weight.

45. There is no clear evidence of any available and existing pitch, there is a waiting list at The Ride and the family pitches at Ridge Road are limited in size and the number of mobile homes that they are allowed to accommodate. There appears therefore no suitable, affordable and acceptable alternative sites available for the intended occupants of the appeal site within the Plymouth Council area. While Policy DEV13 of the JLP would allow sites to come forward for planning permission, none have done so recently within the Plymouth Council area, with the exception of the appeal site. The Council, it appears because of the conclusions of the Accommodation Assessment, is not actively seeking to deliver or identify land for pitches. There is, therefore, limited options for Gypsies and Travellers in need of housing on pitches and who wish to have a base for travel from within their local Plymouth community. In these circumstances, the lack of alternative pitches to meet the needs of local Gypsies and Travellers should afford substantial weight in favour of the scheme.
46. The appeal decisions in June 2010 for two Gypsy and Traveller sites at Ridge Road raises some similar issues as the present proposal. The 2010 appeal sites were both within the Saltram Countryside Park Strategic Green Space. Those two sites were for two families and two of the offspring of those families are now seeking to live on the appeal site. Accordingly, the proposed occupants are from Plymouth families living in the local area. The two couples are both seeking, after some years, to acquire culturally appropriate housing in the form of a mobile home on a pitch. At the present time, the proposed occupants are in overcrowded accommodation and the lack of appropriate accommodation is restricting the ability of both couples to occupy housing on suitable pitches. This is hindering the ability of both couples to engage in a family life, although there are no children who would be presently directly affected by this appeal decision. The personal circumstances of the proposed occupants of the site, who are local Romany Gypsies and meet with the definition in the PPTS, accrues substantial weight in support of the scheme.

Planning Balance and Conclusion

47. Drawing all these matters together, the scheme would conflict with the policies for the Saltram Countryside Park Strategic Green Space (in particular Policies DEV27 and PLY54 of the JLP) and Policy DEV26 of the JLP concerning biodiversity. Notwithstanding the compliance with Policy DEV13, concerning Gypsy and Traveller accommodation, I consider that the scheme would conflict with the development plan when considered as a whole.
48. In terms of other considerations, I attach moderate weight to the compliance with Policy DEV13 of the JLP and the PPTS. I attach substantial weight to the unmet need for Gypsy and Traveller pitches which would assist in meeting the needs of the proposed occupants. Furthermore, the lack of availability of suitable, affordable and acceptable alternative sites should be afforded substantial weight and also the personal circumstances of the proposed occupants of the site should accrue substantial weight. The combined weight in support of the scheme is therefore substantial.
49. The harm to, and policy conflict with, the Strategic Green Space and the functions and characteristics of the Saltram Countryside Park would be fairly

modest for the reasons I have explained. This is a matter that I attribute moderate weight. However, the potential disruption and harm to the habitat of bats is a matter of great significance. This weighs to a very large extent against the proposal.

50. The scheme is not without merit, however, the importance of ensuring that a protected species is not unduly harmed tips the balance of all the considerations such that the combined harm would not be outweighed by the cumulative benefits of the proposal. There is no planning conditions that could address this matter or wider public interest that would outweigh the balance of harm that I have identified. It follows that the scheme would not accord with the development plan when considered as a whole and material considerations do not indicate a decision should be made otherwise.
51. I have also considered whether a personal or temporary planning permission would be warranted. However, a personal permission would not limit or reduce the potential harm to bats that could result from the proposed residential development. A temporary permission would limit the length of time that the potential harm could take place, but given the importance of the protected species this would not be acceptable even for a short period. Furthermore, there is no clear reason, such as the anticipated future delivery of pitches or an emerging change in policy, that would help to justify a temporary permission in this case. Accordingly, I conclude that a personal and/or temporary planning permission would not be warranted in the circumstances of this proposal.
52. The proposed occupiers of the site are ethnic Romany Gypsies and have protected characteristics of race in terms of the Public Sector Equality Duty (PSED) contained in section 149 of the Equality Act 2010. I have also considered the rights of the appellants under the Human Rights Act 1998. In particular, Article 8 affords the right to respect for private and family life, including the traditions and culture associated with the gypsy way of life. This is a qualified right, and interference may be justified where in the public interest. The concept of proportionality is crucial. I have taken into account the personal circumstances of the appellants in my considerations and do so again specifically in this conclusion having due regard to the requirements of the PSED and in terms of human rights.
53. The refusal of planning permission is likely to lead to the appellants continuing in accommodation which is not suitable or appropriate for their needs. Dismissing the appeal would interfere with the proposed occupier's rights. However, the interference of these rights would be justified in this case, in the public interest and in a proportionate way. In particular it would be in relation to the legitimate aim of protecting the interests of a protected species and the Strategic Green Space. A temporary and/or personal permission would not be acceptable or proportionate for the reasons explained and planning conditions could not address the identified harm. The protection of the public interest, in relation to the protection of biodiversity and the function and characteristics of the Strategic Green Space, cannot be achieved by a means that are less interfering with the proposed occupiers rights. In these circumstances, dismissal of the appeal is proportionate and the appropriate course of action.

54. In the light of the above analysis, I conclude that the appeal should be dismissed.

David Wyborn

INSPECTOR

APPEARANCES

FOR THE APPELLANT:

Dr Angus Murdoch	Murdoch Planning Limited
Rhodri Crandon	TDA Landscape Consultancy
Lacey Keating	Appellant
Ben Bowden	Appellant's fiancé
Peter Bowden	Landowner

FOR THE LOCAL PLANNING AUTHORITY:

Paul Webber	Plymouth City Council
Sarah Foqué	Plymouth City Council