



## **JLP Councils note to Inspectors re. Eastern Kings LGS**

**16 March 2018**

### **Context**

At the Examination the MOD raised their objection to the LGS designation proposed at Eastern Kings. It was stated by the MOD that the functions of QHM, which is based on the site, was under review and until that was completed the future use of the site could not be fully identified. It was proposed by the Council's at the Hearing that the boundary of the LGS could be reviewed to give more space around the building in case the QHM function required an extension to the current building.

It was agreed that this matter would be reviewed further and reported back to the Inspectors.

The MOD have since submitted a further representation stating their continued objection to any LGS proposal on their land and would not be responsive to a change in the boundary. The reason stated is that 'future operational development within the proposed LGS boundary – for the QHM and also, until the remainder of the site is vacated, for other MOD purposes - would be contrary to the Plan or that the boundaries of the LGS'.

### **LGS Identification and Justification**

The LGS at Eastern Kings was proposed by a member of the public in the first round of consultations asking the public to nominate spaces they viewed were demonstrably special and required protection. The detail of the LGS assessment and designation process and how it aligns with the requirements of the NPPF can be viewed in EN31. This particular site when assessed met the 6 criteria that the Council's had identified for assessing these sites.

The importance of this site to the green network in Plymouth is also justified through other documents that form the evidence for the JLP.

- EN 34/34A Appendix 2 Site ID 181 - states that the coastal site (which includes the LGS site) importance includes its contribution to the setting of the City, informal recreation, long views out to the Sound.

- SUB 6 Biodiversity - The site forms part of the Citywide biodiversity network and is directly adjacent to the Plymouth Sound and Estuaries Special Area of Conservation. It also contains some prominent trees.
- EN 22/22A Plymouth and Plymouth Urban Fringe Landscape and Seascape Assessment – Shows this site has a high level of intervisibility (fig 2.4) and is directly adjacent to Character Area 29 Inner Plymouth Sound.

Therefore the LGS as proposed meets all the requirements of the NPPF and the detailed assessment process the Council's established to judge nominated sites. The site has been determined (by nomination) to be viewed as demonstrably special to local people and its value is also evidenced through documents submitted in support of the JLP.

### **MOD Objection**

The MOD retained objection to the LGS is set out in EXD47 to the LGS is centred around the potential future use of the site and they have proposed that the site be incorporated into PLY32. PLY32 does not have a provision to protect this area of greenspace as it is demonstrably special to the local community, which is the purpose of the LGS designation.

No further evidence has been provided as to how the LGS designation would affect the operation of the site in the near future or why it would not be compatible with future redevelopment of the site. The current operational needs of the site are known so any impact from the designation should be quantifiable. With regards future redevelopment they state they had envisaged a coastal park in this location which would be fully compatible with the LGS designation and would certainly enable the designation to endure beyond the end of the plan.

### **Council's Conclusion**

The LGS designation is fully compliant with the requirements of the NPPF 76 and 77 and therefore the Council's view is that the site should be incorporated within the Plan to protect this important greenspace. Although the Councils would have been happy to review the boundary of the LGS in light of MODs objection, it does not agree that the entire site should be removed as an LGS.

It should be noted that through the LGS designation process originally four MOD owned sites were consulted on as potential LGS sites. Through the consultation and assessment process three of those sites were then removed from the final list as a result of the objection and evidence provided by the MOD. Only this remaining MOD site is now proposed for designation.