Note for the Inspectors re.
LOCAL GREEN SPACE
designations in the PPA produced by West Devon Borough Council, South
MARCH 2018 Hams District Council and Plymouth City Council
Local Greenspace Designations in the PPA

1. Context

1.1. This paper has been prepared in response to the Hearing session discussing Matter 9 that took place on the morning of Tuesday the 20th March 2018. At this session, the Inspectors sought more information to justify the specific Local Greenspace (LGS) designations made in the Joint Local Plan (JLP), based on a sample of sites, to help them determine whether there was sufficient justification for making LGS designations. In the event that the Inspectors find that there is sufficient justification in principle for making LGS designations, our understanding is that the Inspectors may then wish to review whether all of the 169 are justified and the nature of the policy that should be included in the JLP relating to LGSs. The suggestion was made that it would need to be a distinct policy separate from the rest of DEV28.

1.2. Our paper seeks to address the specific concerns raised by the Inspectors. However, given that this is such an important matter to the Councils and local communities, we feel it important also to restate and clarify why we believe our overall approach to be both sound and robust, complying with all published national policy and guidance on LGS, part of a positively prepared planning strategy, justified by proportionate evidence, and effective.

1.3. We hope our further explanations and responses will assist the Inspectors, and that our overall approach as well as the designations will be considered sound.

2. Councils’ LGS Strategy

2.1. Through all stages of developing the JLP the Councils have put great weight on the need to achieve sustainable development in line with the fundamental principle of the National Planning Policy Framework (NPPF). The Councils have embraced the opportunities that growth provides in terms of providing good quality housing, jobs but also in protecting and enhancing the natural environment, which itself provides vital services for communities. It was also very important to the Councils that local communities had a significant role in shaping the Plan and therefore the future of their neighbourhoods. This is something that is strongly encouraged by the government in national planning policy (paras 69, 150 & 155 and specifically in relation to local green space paras 76, 77).

2.2. National policy on Local Green Space designations originated from the Natural Environment White Paper. When referring to the new designation it stated that ‘We propose that green spaces should be identified in neighbourhood plans and local plans which complement and do not undermine investment in homes, jobs and other essential services. Given the importance of green spaces to the health and happiness of local communities the Government considers the new designation should offer suitably
strong protection to localised areas that are demonstrably special and will consult on that basis.’ (Natural Environment White Paper para 4.23 – our emphasis). The intentions set out in the White Paper were delivered into national planning policy through paragraphs 75-78 of the NPPF. Para 76 particularly carries through the requirement for community participation, stating ‘Local Communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them (NPPF Para 76 – our emphasis).’

2.3. Clearly the designation of LGS confers a high level of protection to these sites, which in many ways is similar to Green Belt protection. It is also noted that NPPF paragraph 76 states:

“Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period.”

The Councils therefore are aware that there could be a risk that the identification of LGS sites could mean that land is removed from any future consideration of sites for housing, for example at future reviews of the JLP. In making the LGS designations in the JLP, however, the Councils are confident that this will not be the case:

- As explained below, we would contend that our approach complements and does not undermine investment in homes, jobs and other essential services (para 76, 3rd sentence); and that we are able to demonstrate compliance with the provisions of national policy which explain that the context for ‘demonstrably special’ is ‘demonstrably special to the local community’ (para 77, 2nd bullet point).

- As is set out in the JLP and explained in the Housing Topic Paper (TP3(rev)) and Employment Topic Paper (TP4) the plan sets out a supply of sites for housing and employment which meets identified needs in full up to the end of the plan period in 2034. Indeed in respect of employment land the plan sets out a significant over supply of sites which will ensure that needs are met. The identification of LGS sites has clearly not affected the Councils’ ability to reach this position.

- As set out in the Housing Topic Paper (TP3(rev)) and discussed at the hearing sessions into Matter 12e hearings, the PPA can demonstrate a rolling 5 year supply of housing land throughout the plan period, with a 20% buffer applied, without needing to bring forward sites proposed as LGS.

- The PPA also has an oversupply of land available for housing development to meet identified needs. This oversupply equates to a supply of housing sites which provides a buffer of 9% of identified housing need, giving the Councils
comfort that needs can be met without needing to bring forward sites identified as LGS.

- As explained during the Hearing Sessions on Matter 3 (Housing) and Matter 7 (Plymouth Policy Area), the Councils have taken a cautious approach to calculating housing land supply in the PPA. This approach has included assuming cautious delivery rates on sites, only allocating sites where evidence shows a reasonable prospect of delivery in the plan period, and making no allowance for additional dwellings to come forward on larger windfall sites. It may be, therefore, that additional supply will come forward in the PPA during the plan period, and that these additional sites will not be on LGS sites.

- As set out in the Councils’ Matter 7 Hearing Statement it should also be noted that the JLP contains ‘opportunity sites’ in the PPA. These sites are not counted as part of the supply of housing or employment land because at the time of drafting the plan the Councils had no evidence to suggest that there was a reasonable prospect of the sites being delivered during the plan period. Nevertheless, these sites do represent potential future sources of supply, which may be brought forwards as part of future reviews of the JLP, again meaning that potential sources of future supply can be brought forwards without needing to bring forward sites identified as LGS.

- It should also be noted that the Councils have consistently attempted to maximise the use of brownfield land for housing development in the PPA. Over the plan period, the housing land supply in the PPA has 63% of supply being built on brownfield sites. Historically, if the delivery of housing since 2001 is added to this calculation, a total of 71% of new homes in the PPA have been built on brownfield land. The JLP clearly aims to continue this approach, and therefore the identification of LGS sites is consistent with the Councils approach of bringing forward previously developed land for new housing.

- The above point is emphasised when it is considered that of the housing land supply set out in the JLP for the PPA, only 13 sites (equating to around 7% of dwellings) had previously been identified with a green space designation in previous plans. Again, this point reinforces that there are a wide range of sources of housing land in the PPA, meaning that the Councils have been able to balance green designations with development land in the past, and in the JLP.

- Although the JLP proposes what may seem to be a very significant number of LGS sites in the PPA, it should be noted that this equates to just 5% of land within the PPA area. Additionally it should be noted that there is within the boundary of the PPA itself many more greenspaces which do not carry this ‘special protection’. This includes 458 Neighbourhood Greenspaces, large
areas of greenspace in the urban fringe and areas of green land that have not been identified. This represents a very significant potential supply of land—albeit land that would need to be assessed through the SHLAA and site selection process of a future JLP review for suitability for housing development.

- Finally, it should be noted that of the 156 sites rejected for allocation in the Plymouth Policy Area (see Tables 3, 5 and 7 of EXC3D), only 8 have been proposed as LGSs within the JLP (see APPENDIX 2).

2.4. The above points demonstrate that both historically, and in the JLP, the Councils have found no difficulties in identifying sufficient sites to accommodate housing needs without needing to rely on significant amounts of designated greenspace land, and that the LGS allocations present no discernible risk to a sufficient supply continuing into the future. In fact the majority of sources of housing land supply in the PPA clearly bring forward new homes on previously developed land.

2.5. As has been demonstrated through other evidence submitted to the Public Examination, and supported by evidence of the City Council’s positive and proactive approach to delivery in EXDS3, the Councils have taken a very positive approach to driving the delivery of housing and employment sites across the Plan area. This has been complemented by a proactive approach to ensuring growth has a positive impact on community infrastructure, including greenspace. Encouraged to do so by the provisions of para 76 of the NPPF, the Councils recognised the importance of communities being encouraged to actively participate in identifying green space sites they felt were of such high value to their health, well-being and happiness that they required special protection.

2.6. The Councils wish to emphasise that a key element of the development of the JLP, and in fact the Plymouth Plan before that, was to work with local communities to identify special sites to them that could meet the requirements to be designated as LGS. This strategy was a response by the Councils to the Localism Act, and the encouragement given by that Act to involve communities in plan making, and to demonstrate to them the advantages of identifying sites for development. Clearly, communities having the ability to identify sites for development, as well as identifying sites to be protected for development represents a more inclusive way to involve people in the planning process, and the opportunity to do this was embraced by the Councils. This is a balanced strategy, planning for the needs of the city and its communities into the future, and is in accordance with para 8 of the NPPF. Para 8 states that in order to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system.

2.7. The JLP only includes the designation of Local Green Spaces within the Plymouth Policy Area (PPA) boundary. The designation of LGSs within the Thriving Towns and
Villages (TTV) will be through the Neighbourhood Planning process. Both approaches are supported by para 76 of the NPPF.

2.8. We think the above analysis clearly demonstrates that the LGS designations will not prevent the Plan having sufficient flexibility to adapt to rapid change in line with NPPF para 14 and therefore meets the provision in para 76 for the designations to be consistent with the planning of sustainable development.

3. Local Greenspace Designation Process – NPPF Compliance

3.1. When developing the process for identifying and justifying the designation of LGSs the Councils identified all available published guidance for establishing a robust evidence base and assessment process. The national available guidance consists of:

- The provisions of NPPF para 76-78
- The National Planning Policy Guidance – particularly para 013 (ref 37-013-20140306) ‘What types of green area can be identified as LGS’ – This states the green area must met the criteria set out in para 77 of the NPPF. It also states that whether to designate land is a matter of local discretion. The NPPG also provided guidance on size, distance from communities etc. All of this guidance was utilised in shaping the process undertaken by the Councils to identify, evidence and justify the LGS sites within the PPA.
- The NPPG does not provide guidance on some provisions of para 77, in particular how to judge if a site meets the test of being ‘demonstrably special to a local community and holds particular significance’. It also does not provide guidance on the level of evidence required to justify the designation of an LGS.

3.2. The Councils reviewed the processes other Local and Neighbourhood Plans were undertaking and established a robust process for the identification and assessment of sites for inclusion within the JLP. The process and timeline for identifying and nominating LGS can be found within EN31 commencing on page 5.

3.3. When collating the evidence and determining the sites suitability for designation, six criteria were assessed which fully align with the NPPF and NPPG requirements for justifying a designation. The criteria, and the Councils approach to meeting them, are as follows:

**The 6 Assessment Criteria:**

1. **Does the green space have existing planning permission?**

   Officers filtered out any green spaces that had planning permission. A case can be made for any special circumstances where designating part of the space would be
compatible with the proposed development. (Compliant with NPPG para 008 Ref 37-008-20140306)

2. Is it already designated?
Officers utilised existing evidence and information to determine whether spaces were already legally designated. Existing designations include:

- Registered Park and Garden
- Registered Common Land
- Town/Village Greens
- Special Protection Area (SPA)
- Special Area of Conservation (SAC)
- Site of Special Scientific Interest (SSSI)

If one of the above designations already existed on a site a special case demonstrating the further additional benefit that Local Green Space would convey would need to be made. (Compliant with NPPG para 011 ref 37-011-20140306)

3. Size limit – Is the green area a vast tract of land?
The NPPF states that LGS should be ‘local in character and is not an extensive tract of land’. Judgement was utilised when assessing size in line with the NPPG. It was determined that sites needed to be largely self-contained and local. No blanket designation of open countryside was being proposed (Compliant with NPPF para 77 and NPPG para 37-015-20140306).

4. Is it demonstrably of local significance?
The assessment reviewed the site characteristics, consultation submissions and evidence related to the site to determine whether the sites special features accorded to the criteria set out in the NPPF: beauty, historic significance, recreational value, tranquillity and/or richness of wildlife. (Compliant with NPPF para 77)

5. Is it local in character and close to the local population?
Plymouth’s local access standard of 400m was used as the maximum distance that a LGS could be from the nearest dwelling house. (Compliant with NPPF para 77 and NPPG para 014 ref 37-014-20140306)

6. The LGS must be capable of enduring beyond the Joint Local Plan or Neighbourhood Plan period.
The assessment reviewed evidence as to whether the special features of the site for which it is proposed for designation would be retained into the future. This included retention of public access, management plans, wildlife value etc. (Compliant with NPPF para 77).
3.4. In designating LGS the Councils have been mindful of the NPPG which states “There are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgment will inevitably be needed. However, paragraph 77 of the National Planning Policy Framework is clear that Local Green Space designation should only be used where the green area concerned is not an extensive tract of land. Consequently blanket designation of open countryside adjacent to settlements will not be appropriate (NPPG para 015 Ref 37-015-20140306 – our emphasis). The Councils have definitely not used the LGS designation as a blanket designation of open countryside, the sites that have come forward are contained sites with defined boundaries that are specific to the special features of the site.

3.5. The LGS sites vary in size due to the different nature of the sites and there special features but also as a result of the different nature of the City in different locations. For example the LGS in the south west of the City are generally smaller due the dense urban form in that location whereas in the north west of the City the LGS are generally larger as the sites often include steep wooded valleys that provide separation between neighbourhoods. The diversity of LGS sizes is in keeping with the NPPG as the Councils have responded to the different natures of the place and aligns with the NPPF as the sites are those that are demonstrably special to the communities they serve.

3.6. The majority of sites are small in nature, table 1 below gives some further detail on the sizes of the sites. The size of individual LGS sites are however fully justified by the special qualities of the site and what makes them important to local communities. The evidence base and the judgement of officers, in line with the NPPG, has been used to justify whether the size of a LGS is justified.

Table 1 – LGS size details

<table>
<thead>
<tr>
<th>LGS size category</th>
<th>Number of Sites</th>
<th>Area of land covered.</th>
<th>% of LGS designated land</th>
<th>Commentary</th>
</tr>
</thead>
<tbody>
<tr>
<td>Over 10ha</td>
<td>21</td>
<td>468ha</td>
<td>62%</td>
<td>This sites in this category are larger due to the special characteristics for which they were identified as demonstrably special for example LGS in this category include existing LNRs, CWS, Plymouth Hoe.</td>
</tr>
<tr>
<td>5-9.99ha</td>
<td>20</td>
<td>133ha</td>
<td>18%</td>
<td>The sizes of the site in this category are also intrinsically linked to the special characteristics for which they were identified as demonstrably special for example ancient woodland, Victorian Parks. Recreation grounds</td>
</tr>
<tr>
<td>&gt;5ha</td>
<td>128</td>
<td>157ha</td>
<td>20%</td>
<td>The majority of sites fall in this size category. This incorporates a large</td>
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<tr>
<td>Total</td>
<td>169</td>
<td>758ha</td>
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4. **Evidence to support the designation of LGS sites**

4.1. There is no national guidance on the amount or type of evidence required to justify the inclusion of an LGS designation in a Local Plan. The Councils therefore utilised the criteria detailed above, that is fully compliant with the NPPF and NPPG, as the basis for a robust method for establishing an evidence based assessment process that is proportionate and fully aligned to the requirements in the NPPF. We are unaware of any approach that is more appropriate and robust than the one we have taken.

4.2. The NPPF provides some guidance on the use of proportionate evidence in relation to the environment. The Councils therefore ensured the LGS process was aligned to these requirements; particularly the requirements as set out in para 165 to utilise ‘up to date information about the natural environment and other characteristics…’.

4.3. In reviewing potential LGSs, the Councils’ own assessments drew from evidence submitted in representations from the community, documents that are now form part of the evidence base for the submitted plan and any other relevant evidence specific to the site. Evidence used to support the justification of the sites designation included:

- Information provided by the community leaders, elected members and community members on what made the site of local significance and local in character to them. This information was submitted as part of the nomination process, as consultation responses to the plan at each stage and collected during the events to develop the neighbourhood toolkits. Further information is provided in section 5 below.
- Site-specific information – this included where available/applicable ecological surveys, cultural/historic information, biological records, TPO etc.
- The sites inclusion within and the evidence underpinning the Biodiversity Network (EN30 and SUB6),
- Evidence held within green space assessments (EN4, EN20/20A, EN26, EN34/34A, EN36);
- Evidence held within landscape assessments (EN22/22A).

4.4. The Councils are therefore confident that the LGS designations are based upon a robust and proportionate evidence base. Each site assessment utilised multiple sources of up to date information and was tested against NPPF/NPPG compliant criteria. The sites proposed therefore all meet the requirements of NPPF paras 76-78. The resulting designations are complimentary to the rest of the Plan and will support the delivery of sustainable development. We have difficulty in identifying what
more could be needed to satisfy the test of basing our strategy on ‘proportionate’ evidence, but clearly accept that we need to be able to explain how we have translated this evidence into decisions to actually identifying specific sites as LGSs. We hope the rest of this paper, and in particular Appendix 1, will give comfort on this point.

4.5. As requested, examples are provided in Appendix 1 of sites that are included for designation as LGS. These examples give more detail as to how individual sites were assessed and evidenced in justifying the LGS designation. Seven site examples are included, the three sites raised at the Hearing, a further three designated sites and one example of a site rejected as part of the process.

5. Community Engagement with the LGS Process

5.1. Since 2015 communities have been working with the Councils to identify local greenspaces that are demonstrably important to them for designation as LGS. The Council takes a positive approach to community involvement in the plan making process, in line with paragraph 169 of the NPPF. As such, the community have been engaged since the early stages of the process. They have had numerous opportunities to identify and promote sites for designation as a local green space, as such elected members, community leaders and individuals have taken the opportunity to put forward spaces that are important to them. The submissions received demonstrates the community support for the inclusion of the designation for the sites most special to them. They welcomed the provisions of the NPPF paras 76-78 that allowed them to participate in identifying the sites that would receive the designation.

5.2. The LGS designations within the Plan have been positively received by communities. Of the sites proposed only a few have remaining objections. These are from prospective developers whose sites were not deemed by the Councils as sustainable development and were not needed to meet the housing need. A summary of the reasons for the rejection of their sites as housing allocations in the Plymouth Policy Area can be found in EXC3D Table 3.

6. The number of LGS designations

6.1. It has been suggested that the fact that there are 169 LGSs proposed could be evidence of unsoundness, given that such designations carry a special level of protection (para 76 of NPPF, first sentence) and that para 77 states that LGS designation will not be appropriate for most green areas or open space.

6.2. In our view, there is no conflict with these provisions, which need to be considered in proper context. Only 5% of land within the PPA boundary would be designated as LGS, this constitutes only 0.5% of the land area within the JLP boundary. Within the
boundary of the PPA itself there are many more greenspaces which do not carry this ‘special protection’; including 458 Neighbourhood Greenspaces, large areas of greenspace in the urban fringe and areas of green land that have not been identified formally. This demonstrates that the Councils have only designated a small amount of land as LGS and therefore complies with para 77 requirement that the designation will not be appropriate for most green spaces.

6.3. Furthermore, we would contend that the most important issue is the robustness of the approach that we have undertaken in identifying the LGSs.

7. Demonstrably special to the local community

7.1. The Councils have ensured all the sites that have been designated have met the criteria within the three bullets within para 77 and meets the test that the sites are demonstrably special to the local community, a fundamental component of the NPPF paras relating to LGS. So although there are 169 LGS sites each of these has been individually assessed, checked against evidence and designated because they met the criteria.

8. Soundness of LGS Designations

8.1. In conclusion, the LGS designations within the submitted JLP are compliant with the provisions of NPPF para 182 in so much that they are:

- **Positively Prepared** – The designation of the LGS sites are consistent with the planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. The designation of the sites will not limit the flexibility of the plan to respond to change but will ensure sustainable development by ensuring growth protects the most special sites.

- **Justified** – The LGS designations are justified based on proportionate evidence and are integral to the JLP strategy for sustainable growth.

- **Effective** – The LGS designations within the PPA and those that come forward through neighbourhood plans, that will utilise the same robust process, will enable the delivery of sustainable development over the plan period.

- **Consistent with National Policy** – As detailed above the process of identification, assessment and justification of LGS sites is robust and compliant with the provisions of the NPPF and the guidance provided in the NPPG.

8.2. Having regard to the provisions of the NPPF and advice in the NPPG the Councils have included the designation of LGS sites as an essential part of the growth strategy of the area and a key component of the areas sustainable growth.
8.3. Furthermore, it is the Councils view the deletion of the policy and removal of the designated sites may make the JLP fail to be consistent with national policy – in particular:

- NPPF para 8, in that it would not deliver the balanced approach to sustainable development advocated.
- NPPF paras 150 and 155 – which says that local plans should reflect the vision and aspirations of local communities, and the ability of communities to influence the plan through protecting sites of special importance to them in line with paras 76-78 would have been undermined.

8.4. Indeed, it can be anticipated that significant representations from local communities will be made to any main modifications that remove the LGS designations they have sought to promote through the JLP process.

8.5. In the event that the evidence that we have submitted in this paper has not persuaded the inspectors, either fully or in part, we would seek guidance as to how we are able to correct any soundness deficiency in the plan. However, we are hopeful that the paper does provide sufficient comfort to the inspectors that our approach is sound, and that any modifications that may be needed will be matters of detail and not undermine the whole basis of the LGS approach.
Site name: Budshead Creek
Site number: 18

Description of the site

This site is bordered in the north by the European Marine Site and leads from Truro Drive along Tamerton Lake all the way round to Riverside Walk in Tamerton Foliot. The site provides a direct connection to Cann Woods Local Nature Reserve to the south. A footpath allows access at sea level through the site whilst fields and woodlands rise steeply eastwards in places. The site consists of a mix of pasture land, mature hedgerows, deciduous woodland and open space. There are long, confined views of Tamerton Lake.

Ownership: PCC (shown with purple outline in map below)/Private

Community the site serves: Whitleigh Neighbourhood

Site plan (Site extent shown in green):
Size, scale and local nature of the site (NPPF para 77 bullet 1&2)

Site size: 12.28 ha

Is the site a vast tract of land? No, the site has clearly defined boundaries. To the north the site is bounded by the Tamerton Lake and to the south by Tamerton Foliot Village. The site does not directly link to further areas of countryside.

Is the site ‘local in character’? Yes, the site makes an important contribution to the character of the area. The Plymouth and Plymouth Urban Fringe Landscape Seascape Assessment (EN22) identifies Budshead Creek as part of landscape character area CA21: Tamerton Lake and Wooded Fringes. The assessment describes this area as the naturalistic edge to the nearby settlements including Ernesettle and the historic core of Tamerton Foliot.

How does it connect to the surrounding communities? The site is connected physically to the local community through the footpath that runs alongside the edge of the lake. The site also connects to the community visually as it provides the naturalistic edge to the nearby settlements and is visually prominent from the surrounding settlements of Ernesettle and Whiteligh to the south and from Cornwall across the River Tamar; as stated within the Landscape character assessment (EN22).

Planning history

Does the site have planning permission? No

Is it proposed for allocation in the JLP for housing/employment? No

Evidence that the green area is ‘demonstrably special’ to the local community (NPPF para 77 bullet 2)

Support from Local Councillors: Yes

Evidence of support from Local Councillors, local community: The Council consultation at Reg. 19 stage proposed two alternatives for part of the site, LGS designation or housing allocation. Tremendous support for the LGS designation was received with over 150 representations requesting it remaining as green space and only a single response from the developer supporting housing. The planning application (16/02295/OUT) that was determined on this site also received a large number of representations objecting to the scheme due to the sites’ wildlife value (see appendix 1 for more detail).

JLP evidence base relevant to sites special qualities that justify designation:

Beauty - The site abuts the Tamar Valley AONB and has a visual relationship with this area.

FIGURE 2.4 - Strategically important skylines and landmarks of The Plymouth and Plymouth Urban Fringe Landscape Seascape Assessment (EN22), as shown above, highlights the intervisibility between Budshead Creek and the Tamar Valley AONB. Following the aforementioned it should be considered that Budshead helps to shape the setting of the Tamar Valley AONB, which is valued at a national level for its scenic qualities and important wildlife resource.
The landscape Assessment defines the tree planting on the elevated slopes as creating a wooded skyline, which is particularly prominent from the water’s edge and the adjacent settlements of Ernesettle, Whitleigh and Tamerton Foliot. Budshead Creek as stated above provides a naturalistic edge to the surrounding settlements. Another feature, which shapes the experience of this area, is the sights, sounds and smells of the estuary – its overall character changing frequently with the tides.

The 2017 Open Space Assessment further identifies that the site functions as a separating element between urban/ rural edge and helps to shape the setting of the local area and the wider urban context.

**Historic significance** - The most eastern part of the site is located within the Tamerton Foliot conservation area and assists in creating the setting for this conservation area.

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Recreational value – The site has a well-used footpath, the Plymouth Cross City Link, which runs along Tamerton Lake. There is some further restricted access. The site is used for informal recreation including walking, dog walking, children playing, young people socialising, and sitting/relaxing. The site includes various desire lines (EN34).

**Tranquillity** - The Plymouth and Plymouth Urban Fringe Landscape Seascape Assessment defines the Budshead Creek (as part of CA21) as being tranquil and mostly undeveloped and forming a naturalistic edge to nearby settlements including Ernesettle and the historic core of Tamerton Foliot. This strong sense of tranquillity and rurality is associated with a dynamic landscape/seascape.

**Richness of wildlife** - Budshead Creek is important for wildlife because it is next to a SAC (Plymouth Sound and Estuaries) and the Tamar-Tavy Estuary SSSI. There is a TPO (TPO 24: Holly Park’) over a large section of the site. The site also directly connects to the Cann Woods LNR and forms an important link in the biodiversity network that crosses the site.

The site consists of a riverine woodland edge of high importance, and amenity grassland. The open space assessment 2017 (EN34) highlights the following vegetation types that would be an important resource for wildlife: Low growing herbs, woodland, veteran trees/significant individual trees, deadwood, scrub and hedge.

The site is also part of the Biodiversity Network – site name ‘Tamerton Fields’. It has a key habitat of semi-improved grassland and key species of Bluebell (WCA 8 S), Grass Snake (WCA 5 KIS, Bern III, UKBAP), Box (NR) and Song Thrush (UKBAP; Red), 1 DN2, 2 DN3. The rationale for the site is that it buffers the statutory site (Tamar/Tavy Estuary SSSI/SAC). The site also has the confirmed presence of at least 8 species of bats including three Annex II species as well as other protected species.
The 2000 and 2004 Open Space Assessment listed part of the site as being of city value for natural habitats/biodiversity.

**Need for Local Greenspace Designation (NPPF para 76 special circumstance test)**

**What is the justified need for this LGS:** Budshad Creek is a valued greenspace due to its diversity and richness of wildlife. The Creek is a cherished and important part of the biodiversity network with a range of key species. Moreover the site buffers a SSSI and SAC reaffirming the necessity to protect its assets and its location next to protected sites; acting as a barrier between the local urban settings and the neighbouring designations.

The snippet (map from Plymouth Open Space Assessment 2017) indicates that the site delivers a high number of green space functions and therefore multiple benefits for local communities.

The snippet shows the site to be located within an area of medium-high deprivation and in these areas green space can provide even more important functions as part of the community infrastructure.
**Recommended designation:** This site is multi-functional and delivers many services for the communities it supports. However, the role it plays in the city-wide biodiversity network as well as joining and buffering protected sites is particularly important. The importance of the site for local communities due to its wildlife value is demonstrated by the tremendous support for the LGS designation it received. The planning application (16/02295/OUT) that was determined on this site also received a large number of representations objecting to the scheme due to the sites’ wildlife value (see appendix 1 for more detail). The site meets all the criteria of the LGS assessment process and it is therefore recommended that this site is designated as a Local Green Space for Richness of Wildlife.

**Further sources and links**

The Plymouth and Plymouth Urban Fringe Landscape Seascape Assessment (EN22):
- [https://www.plymouth.gov.uk/sites/default/files/PlymouthAndPlymouthUrbanFringeLandscapeAndSeascapeAssessmentChapters1to3.pdf](https://www.plymouth.gov.uk/sites/default/files/PlymouthAndPlymouthUrbanFringeLandscapeAndSeascapeAssessmentChapters1to3.pdf)
- [https://www.plymouth.gov.uk/sites/default/files/PlymouthAndPlymouthUrbanFringeLandscapeAndSeascapeAssessmentChapter4Onwards.pdf](https://www.plymouth.gov.uk/sites/default/files/PlymouthAndPlymouthUrbanFringeLandscapeAndSeascapeAssessmentChapter4Onwards.pdf)

Plymouth Open Space Assessment (EN34):
- [http://web.plymouth.gov.uk/ppaopenspacereport.pdf](http://web.plymouth.gov.uk/ppaopenspacereport.pdf)
- [http://web.plymouth.gov.uk/ppaopenspaceappendix2.pdf](http://web.plymouth.gov.uk/ppaopenspaceappendix2.pdf)

Planning Application 16/02295/OUT
- [https://planning.plymouth.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=ZZZR3MMXE796](https://planning.plymouth.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=ZZZR3MMXE796)
Appendix 1

Examples of representations made demonstrating the sites importance to the community for its Richness of Wildlife:

**Representation 1**

I am writing to register my strong objections to the above proposed development in the Lakeview Close area of Tamerton Foliot. The idea of a housing development in this area shows a distinct lack of environmental accountability and understanding for what is an area of beauty. The area in question represents part of an ever-shrinking natural habitat for a number of species including but not exclusive to, various species of butterfly and moth, Barn owls, Tawny owls, foxes, deer and various species of bat. Disruption of bat species in particular, especially during sensitive times of year (e.g. during hibernation in winter or when baby bats are born and raised in the summer), are likely to have hugely detrimental impacts on local bat populations.

I would also like to point out the folly of the movement and use of heavy plant machinery and building apparatus in the immediate vicinity of Cann Wood (Andy Stevens’s Nature Reserve) which represents 24 hectares of protected land. A number of the species within this reserve and its surrounds, including the area of the proposed development, are already in decline and therefore need to be protected. Notable amongst these declining species are; the Song thrush, Bullfinch, Goldfinch, Green woodpecker and the Swallow. All of these species have been shown to have made some recovery, but their recovery should not be taken for granted and protection (under the United Kingdom Biodiversity Action Plan) offered wherever possible.

This development also poses significantly increased risk of flooding to the residents of Riverside Walk and Manorside Cottage and indeed areas adjacent to the river channel itself (Lakeside Drive and Salt’s Cottage). Current peak discharge for the specific area of proposed building is approximately 13.82m³/day (based on rainfall figures for 2016). The impermeable surfaces associated with building residential areas will radically reduce the absorption of rainfall in the area. Using the same 2016 rainfall total, the impermeability of the development (when completed), raises the peak discharge to 62.64m³/day. This represents a 77% increase in the peak discharge of rain water into the river channel as a result of this development alone. This in itself raises issues, most likely in the form of unprecedented levels of erosion on the footpath that runs alongside the estuary, Station Road and indeed on the tidal mudflats which provide yet another habitat for a wide variety of estuarine life.

Overall, I would say that this development would have profoundly negative impacts upon the area, both for the existing residents, and the various flora and fauna which use the area as their home.

**Representation 2**

I am writing to declare my strong objections to the above proposed development in the Lakeview Close area of Tamerton Foliot. I know the area in question well and I believe that these plans will be detrimental to the natural habitats and indeed current housing in the sites surrounds. The National Planning Policy Framework (2012) states that the planning system should contribute to and enhance the natural and local environment by:

"...minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government’s commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures..."

This development stands to do the opposite by destroying the ecosystem of the immediate area. It is also likely to have negative impacts on the Andy Stevens Nature Reserve (Cann Woods), which stands adjacent to the area in question, both visually and with significant levels of noise pollution.

... It must also be said that the loss of this natural resource represents the loss of an opportunity for local children to enjoy natural play in the area.

In summary, I would say that it would be negligent to allow this development to go ahead when weighed against the negative impacts associated with it.

**Representation 3**

I write regarding the above reference, regarding the development of all land designated green space around Holly Park, Lake View Drive, Lake View Close.

We agree that the fields between Lake View Close and Riverside Walk should remain as local green space, and no development should be allowed to take place. This would preserve this land...
for purposes of recreation for the wider community, as well as protecting wildlife and fauna, some of which is already protected and rare.

<table>
<thead>
<tr>
<th>Representation 4</th>
<th>I fully support the JLP designation of all areas within Tamerton Foliot as either Local Neighbourhood Green Space or Local Green Space to protect the natural environment of the area and to recognise the detrimental effect such a development would have.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Representation 5</td>
<td>We write to support the Joint Local Plan that has designated all areas within the Tamerton Foliot area as either local neighbourhood green space or local green space. In particular we would urge that any request for development on the fields between Lakeview Close and Riverside Walk, which we understand has been identified as Local Green Space, be refused. We have only recently moved to this area and the reason we picked our particular house is because of the openness in front of our property and the open green space when walking along the footpath beside Tamerton Lake toward Tamerton Foliot. There is certainly a wide variety of wildlife in this area, including woodpeckers, squirrels, owls, and a fox to name a few, and obviously this green space has the necessary food to sustain these and many more species. We have also very recently had a newt in our garden and sadly all this would be lost if a development was given the go ahead. I believe with all the housing that is already in this area this green space is needed as a run off for the rainfall. There is also the issue of access to any new development as the only road that I believe would be used is already busy and can get very congested. We would urge that any request for development of this land is refused.</td>
</tr>
</tbody>
</table>
Description of the site

A privately-owned, wooded, north-facing valley side with a large area recently clear-felled. The site is directly adjacent to Southway Woods Local Nature Reserve (LNR). The clear-felling was due to the presence of *Phytophthora ramorum* in the Japanese Larch plantation, and followed the issuing of a Statutory Plant Health Notice (SPHN) by the Forestry Commission. One part of the site to the eastern edge is not Larch but mixed deciduous woodland. To the west there is an area of Douglas Fir and Ash. Within the clear-felled area there are a couple of veteran Oaks on an historic boundary bank. In addition there are mature Oaks, Ash and Sycamore on the northern boundary near the stream. A woodland TPO (No. 328) was placed on the area in 1997 and a narrow finger of the TPO extends to the east beyond the Local Greenspace boundary.

The part of the site that has been clear-felled has been left fallow, when natural regeneration of species other than Japanese Larch (Japanese Larch regeneration will need to be removed under the SPHN) occurs then this regeneration is automatically covered by the TPO. No restocking by the owner has been carried out to date and the owner, despite advice to the contrary, did not make an application under the TPO to remove the diseased trees or issue a 5-day notice to fell dead/dangerous trees. The FC has stated that the SPHN does not legally require re-stocking, but the land use cannot be changed, unless there is a planning consent approved by the LPA, i.e. Plymouth City Council. They have informed the owner that without re-stocking, it will turn into a ‘brake’. If the owner does not intend to replant then effectively the land use has changed (deforested) and the FC then has to undertake an EIA to decide whether or not to require replanting (see further information section below). This site has high public amenity and landscape value, and in addition the presence of the LNR and TPO is also likely to add weight for the requirement to replant. Works still continue on site to burn the brash and roots of the Larch, when this activity has ceased natural regeneration should readily occur. This site when regenerated/replanted will have a greater biodiversity value than well it formed a Larch plantation.

Ownership: Private

Community the site serves: Derriford and Southway
Site Plan:

Size, scale and local nature of the site (NPPF para 77 bullet 1 and 2)

Site size: 6.72HA

Is the site a vast tract of land? No, the site is bounded by residential development to the south and by other green spaces to the east, the north and the west. The site forms part of a larger north-facing, partly wooded, valley side slope that is totally enclosed by residential communities.

Is the site ‘local in character’? Yes, the Landscape character area CA09: Southway Wooded Valley, which includes the site defines the area as providing a pocket of naturalistic woodland amongst dense urban development, which is valued by the local population for informal recreation. Views in and out of the area are limited, however the treed skyline forms a distinctive backdrop to nearby settlement. (EN22)

How does it connect to the surrounding communities? The site is immediately adjacent to large residential areas of Southway and Derriford and Southway LNR. There is informal access through the site to the LNR and the residential area beyond. Further as raised above, the treed skyline forms a distinctive backdrop to nearby settlement (EN22).

Planning history

Does the site have planning permission? No

Is it proposed for allocation in the JLP for Housing/Employment? No
Evidence that the green area is ‘demonstrably special’ to the local community (NPPF para 77 bullet 2)

Support from Local Councillors: Yes

Evidence of support from Local Councillors, local community: Yes we received community representations relating to this site and adjacent greenspaces.

JLP evidence base relevant to sites special qualities that justify designation:

Beauty – The site has been altered since designated due to the removal of the monoculture of Japanese Larch but several veteran Oaks, Douglas Fir and Ash remain with patches of grass, ground flora and bramble where the land is not currently being disturbed.

Further FIGURE 2.4 - Strategically important skylines and landmarks of The Plymouth and Plymouth Urban Fringe Landscape Seascape Assessment (EN22) shows the site (number 17) to be important to the skyline of Plymouth as it provides a wooded skyline feature (see snippet below, site shown in red dashed line):

Dunraven Drive Woods forms part of an area which provides an undeveloped and naturalistic oasis amongst dense residential development and which forms a treed skyline creating a distinctive backdrop to nearby settlement. The dense woodland (where it is still present on-site and when it will be re-instated) and the landform create a sense of enclosure with limited views out. The site offers visual amenity to the surrounding dwellings as it is overlooked by houses on all sides. Further it provides a key green wedge separating the settlements of Southway and Derriford. (EN22)

Historic significance – The site contains veteran oak trees on an old bank.

Recreational value – The site has desire lines crossing it which shows it is informally accessed by public, to the east of the site it is used to gain access to the Southway LNR.

The wider area, in which Dunraven Drive Woods sits, is managed for informal recreation and includes a network of permissive paths and provides access to the valley on foot. The landscape character area as a whole is valued as an area of green space for informal recreation by the residents in the surrounding area – including as dog walking area. (EN22)

Tranquillity – The site is not disturbed by the presence of any main roads, and is mainly abutted by residential roads. There is a sense of enclosure due to the sloping landform and the wooded nature (although parts of the site have been felled). (EN22)

Richness of Wildlife – Parts of the site still contains areas of deciduous trees and Douglas Fir and mature Oaks on the northern boundary near the stream. The centre has recently been clear felled of a plantation of Japanese Larch due to disease and works still continue on site to burn the brash and roots. Once the activity on site has ceased natural regeneration will readily occur due to the proximity of the adjacent deciduous woodland, which has prolific
regeneration of Ash and Beech. The removal of effectively a monoculture will allow natural regeneration to occur which will enhance the biological diversity of the species in this area; there is already evidence of Bluebells and Foxglove being present in the felled area. In the centre of this area is an old wall/bank boundary with veteran Oaks present. There are also reports of Badgers in the area.

The landscape character Assessment defines the character area in which Dunraven Drive Woods, is located as ‘an undeveloped and naturalistic oasis amongst dense residential development’.

The site is directly adjacent next to Southway Woods LNR and although landownership and public access is difference, the sites must be viewed as a single functional site for biodiversity. The LNR provides a biodiversity resource for the area containing a number of habitats including, woodland, hedgerows, grassland and a stream. Several ancient woodland flowers including the common spotted orchid, bluebell, primrose, yellow pimpernel, wild garlic and pignut can be found here. These will readily recolonise the site now the Larch has been removed.

The site itself is part of a Biodiversity Network Feature (Number 41) which has a key habitat type of poor semi-improved grassland, semi-natural mixed & plantation coniferous woodland. It has key species of Bluebell (WCA 8 S), Badger (WCA 6, BA, Bern III), Common Frog (WCA 5 S, EC Va; Bern III). Box (NR), Twiggy Mullein (NS), Song Thrush (UKBAP; Red), and Cinnabar (UKBAP) 1 DBAP, 2 Red, 2 Amber, 2 DN1, 1 DN2, 1 DN3. The rational for the site is that it buffers a statutory site (Southway Valley LNR).

Although the site has had the Larch removed this must not been seen as a reason to change the land use of the site, the Forestry Commission are very clear on this point in their guidance. This was a required action due to a specific disease and it is the expectation that this site will return to a woodland site, and that will actually be of a greater wildlife value than when the site was covered with Larch. The picture below shows the site in its current form:
Need for Local Greenspace Designation (NPPF para 76 special circumstance test)

What is the justified need for this LGS:

The site is mainly designated for its richness of wildlife. The site was originally wooded with a monoculture of larch, which had to be removed due to a disease; however the required regeneration will result in an enhancement of the biological diversity of the species in this area. The current clear felled area includes Bluebells and Foxgloves. In the centre of this area is an old wall/bank boundary with veteran Oaks present. The site abuts Southway woods LNR and forms a buffer for this LNR against any impacts from the neighbouring residential development. Further the landscape character Assessment (EN22) defines Dunraven Drive Woods and its wider landscape context as a key green wedge separating the settlements of Southway and Derriford and as naturalistic oasis amongst dense residential development.

Further the 2017 Open Space Assessment (EN34) provides the following (site shown in red dashed line):

A note on interpretation: Accessibility buffers of 400m have been applied to all of the publicly accessible sites in this typology. These buffers have been coloured up by the value and quality rating for each site. Buffers have been drawn sequentially in the order shown in the legend to ensure that any ++ ratings are shown on top.

The map snippet shows that the site is located within an area where there is a green space deficiency.

The snippet indicates that the site delivers a medium number of open space functions.
The snippet shows the site to be located near an area of high-medium deprivation.

Due to the above the loss of this multi-functional local green space would result in a green space deficiency next to an area of medium-high deprivation.

**Recommendation:** This is a slightly complicated site due to the removal of the Larch due to disease. However in the expectation that the site will return to woodland and the Forestry Commissions guidance that detail that these sites should still be deemed as woodland and that the site still retains an important role as part of the wider site for biodiversity. The site does meet the criteria of the LGS designation process and it is deemed that the wildlife value of the site, which is important to the local community, is retained and will be enhanced as the site recolonises. It is therefore recommended that it is designated as a Local Greenspace Designation for the Richness of Wildlife.

**Further sources and links**

Statutory Plant Health Notices do not place a legal obligation to replant trees. However, this does not mean that there is an automatic right to change land use.

**Environmental Impact Assessment (EIA) Regulations**

Deforestation for the purposes of conversion to another type of land use is subject to the EIA regulations. We will regard any attempt to actively change land-use following felling as a potentially relevant project under these regulations – this would include for example introduction of grazing that prevents the natural regeneration of trees, or de-stumping and conversion to agricultural land. To confirm whether consent is required for these activities you should complete and return to us a determination enquiry form. Further information and a determination form are available at:

https://www.forestry.gov.uk/england-eia
https://forestry.gov.uk/pdf/ON024SitesfelledduePhytophthoraV2.2issued011211.pdf/$FILE/ON024SitesfelledduePhytophthoraV2.2issued011211.pdf

The Plymouth and Plymouth Urban Fringe Landscape Seascape Assessment (EN22):

- https://www.plymouth.gov.uk/sites/default/files/PlymouthAndPlymouthUrbanFringeLandscapeAndSeascapeAssessmentChapters1to3.pdf
- https://www.plymouth.gov.uk/sites/default/files/PlymouthAndPlymouthUrbanFringeLandscapeAndSeascapeAssessmentChapter4Onwards.pdf

Plymouth Open Space Assessment (EN34):

**Site Name:** Dunstone Open Space, Dunstone Woods & Dunstone Allotments  
**Number:** 41

**Description of the site:**

The site is a smoothly rolling landform of medium in size consisting of a mix of deciduous woodland, amenity grassland, allotments and pastureland. Part of the site has a very prominent position and it is one of only a few greenspaces that serve these communities.

**Ownership:** PCC

**Community the site serves:** Plymstock Dunstone Ward

**Site Plan:**
Size, scale and local nature of the site (NPPF Para 77 criteria 1&3)

Site size: 3.89 Ha

Is the site a vast tract of land? No. The site is clearly bounded by residential development on all sides. The size of the site relates to its special characteristics and the functions it performs.

Is the site ‘local in character’? Yes. The site is an important greenspace located within an area of post war residential housing (predominately detached or semi-detached) which is typical of the community. There are long distance views of Staddon Heights and the site itself, particularly the woodland element, is prominent from key points across the City.

How does it connect to the surrounding communities? The site is physical and visual connected to the surrounding communities. There are minor footpaths and five points of access into the site.

Planning history

Does the site have planning permission? No

Is it proposed for allocation in the JLP for Housing/Employment? No

Evidence that the green area is ‘demonstrably special’ to the local community (NPPF para 77 bullet 2)

Support from Local Councillors? Yes

Evidence of support from Local Councillors, local community: There were numerous representation from the community for this site who provided evidence as to why the site was special. Examples of representations received for this site can be found in Appendix 1

JLP Evidence base relevant to sites special qualities that justify designation:

Beauty -

FIGURE 2.4 - Strategically important skylines and landmarks of The Plymouth and Plymouth Urban Fringe Landscape Seascape Assessment (EN22) shows the site to be located within a locally prominent location and defines it as wooded skyline feature (see snippet below):

The 2017 Open Space Assessment (EN34) assessed the site as being visible from the adjoining roads and as providing views of Plymouth City and the wider landscape, including the local area.
**Historic Value**

**Recreational Value**

The 2017 Open Space Assessment (EN34) identifies that the site functions as an area for walking and dog walking. Desire lines are visible on site and the area is visited by a regular flow of people. The site includes seating and has educational interest.

The 2000/2004 Greenscape Assessment defines the site as being of Neighbourhood Value for informal recreation and Access corridors/links and of District value for Agricultural/food growing. This study also lists the following features of recreational value:

- Small seating area
- Allotments

Part of the site currently still functions as allotments.

**Tranquillity**

**Richness of Wildlife**

The site forms part of the biodiversity network that crosses the City. This site is particularly important in the network as in this community there are very few greenspace that deliver a wildlife benefit. The stepping stone role is therefore strategically important. The woods and hedgerows within the site are of particular nature conservation value.

The site comprises three Biodiversity Network Sites:

**Number 261** - which has a key habitat type of Cultivated/disturbed land - allotments/amenity grassland and a rationale of Stepping Stone between two network sites.

**Number 262** - “Dunstone Woods” which has a key habitat type of semi-natural broadleaved woodland, with key species of Bluebell (WCA 8 S) and a rationale of Stepping Stone between two network sites.

**Number 263** - which has a key habitat type of poor semi-improved grassland; key species of Summer Snowflake (NS) Welsh Poppy (NS) Song Thrush (UKBAP, Red) 1 Red, 1 DBAP and a rationale of Stepping Stone between two network sites.

The local community have submitted numerous representation on the wildlife value of the site that is justified through the Biodiversity Network designation.

Snippet from Figure 5.2 from the 2017 Open Space Assessment
Need for local greenspace designation (NPPF para 76 special circumstance test)

What is the justified need for this LGS: The site is important for its wildlife value and the key role it plays in the ecological network of the City and within its specific community.

The site's topography forms an important visual landmark within Plymstock, the A38 to the north and agricultural land outside Plymouth City Council's boundary. Incremental development of part of the site would erode its overall character and undermine its visual prominence from afar.

Further the 2017 Open Space Assessment (EN34) provides the following (site shown in red dashed line):

The map snippet shows that the site delivers a vital greenspace function within an area with a green space deficiency.

The snippet indicates that the site delivers a high number of green space functions.

Recommendation: This site meets the 6 criteria of the LGS designation process, and it is therefore recommended that this site is designated for its richness of wildlife and supporting the cross city network in an area that has a deficiency in greenspace. It could however be designated for its recreational value due to the role it plays in the local community.
FURTHER SOURCES AND LINKS

The Plymouth and Plymouth Urban Fringe Landscape Seascape Assessment (EN22):
  - https://www.plymouth.gov.uk/sites/default/files/PlymouthAndPlymouthUrbanFringeLandscapeAndSeascapeAssessmentChapters1to3.pdf
  - https://www.plymouth.gov.uk/sites/default/files/PlymouthAndPlymouthUrbanFringeLandscapeAndSeascapeAssessmentChapter4Onwards.pdf

Plymouth Open Space Assessment 2017 (EN34):
### Appendix 1

Example of nominations submitted by the public:

<table>
<thead>
<tr>
<th>Nomination</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Nomination 1</td>
<td>The site is most significantly designated 'Local Greenspace' by Plymouth City Council Green Space Strategy 2008-2023, specifically because of the paucity of recreational space in this part of Plymstock/Dunstone/Elburton. It is therefore of recreational significance to these communities, well used by families, adventure groups (guides, scouts), dog-walkers (obviously) and also commuters given this valuable route between Plymstock and Elburton for commerce, trade and education. The greenspace is a site of beauty in that it affords a commanding view for all its users stretching from Plymouth Sound to Dartmoor which adds value to it as a place for the public to use for as variety of purposes as well as offering a atmosphere of serenity. This is a place where users can connect to the maritime heritage of this City, observing the frequent passing of Ships, Ferries and Pleasure Craft all year round. Undoubtedly there is a rich biodiversity in this area given the proximity of the wood. Owls, Birds of Prey and hedgehogs are in abundance - the green space providing a valuable hunting ground for their sustinment. Development in areas adjoining the region (Pony Fielded site) identified slow worms which required the developer’s protection. This was sensitively managed through an ecotone being established along Dunstone Wood. Encroachment onto the Woodway local green space would jeopardise this effort, as well as the viability of the habitat to support the species observed.</td>
</tr>
<tr>
<td>Nomination 2</td>
<td>I believe that the piece of land specified by me should be preserved as an area of recreation and tranquillity in an already overpopulated area. It is used daily by many people of all ages for a number of activities. I understand the need for more houses but to cram them in without thought of collateral damage not only to the immediate surrounding area but to the infrastructure of the parish is bordering on criminality. We have only 100 yards away from this space a new build of some 80 or so houses. We as a parish are already experiencing problems with school placings and doctors’ appointments. This is the last open space remaining in the area for people to use as a quiet spot, and a play area for the children. Please keep it safe from development.</td>
</tr>
<tr>
<td>Nomination 3</td>
<td>This is a local beautiful open space overlooking Plymouth which is used daily by a wide variety of dog walkers. It abuts the Dunstone Woods of historical importance and acts as an important green lung for this area giving haven to woodpeckers and other woodland birds.</td>
</tr>
</tbody>
</table>
| Nomination 4 | The land at Dunstone Woods, is at one of the highest points in Plymstock (higher than Burrow Hill) and affords views to Jennycliff, Burrow Hill, the Sound, the Citadel, Dartmoor and even as far away as Princetown. It is bounded by the back of Dunstone Road, Woodway, Great Churchway, and the allotments of Dunstone Road. As such there is no passing traffic because of the cul-de-sacs and it is a fantastic spot to walk, sit and play with far-reaching views of both the city-scape and the open countryside and sea beyond. The land is crossed by a public footpath which leads right up from St Mary’s Church and can be followed through all the way to Elburton and beyond. The footpath, bounded by old hedges in most places and through the woods at one point, is obviously an old thoroughfare. The land is used daily from early in the morning (residents leaving at dawn report dog walkers on the field enjoying the sunrise) until dusk when the bats come out. During the summer, many people travel to the field to watch the Fireworks, aerial displays, concerts on the Hoe. There is real community feel: neighbours bring camping chairs and blankets up onto the field. It is used by local children to play and local schools and brownie/cub/scout groups use the wood and the field for recreation. Local running groups and school running groups bring runners up Woodway and onto the field to train. Dog walkers use the field all day and one of the great features of this space is that, because of the cul-de-sacs at Woodway and Great Churchway, those who are less mobile can drive up (cars and mobility scooters) and walk, enjoy the view, bring their dogs and family. There are a lot of elderly people in the area whose access to some of the other spaces is restricted. Whatever the weather, people are on the field or walking/running around it and in holidays and in the evenings/weekends there are lots of children on the field. The hedgerows around the field, despite being the boundaries of the houses, seem to have retained some of the old plantings: so come late spring
there were people out collecting elderflowers and come late summer, the berries and blackberries. The butterflies (no idea what kind!) were all about in the summer.

**Nomination 5**

Beauty - Plymstock only has 2 green spaces: Dean Cross and Radford Park. Dunstone Park and Woods provides not only a panorama of the entire city but also hilltop focal point for most south-facing homes in the city. As one of the highest points of the city, it is an essential component of the city’s visual landscape. Historic significance - The park belonged to the estate of the Duke of Bedford. The estate inserted clauses in the titled deeds of the surrounding properties that the land should continue to be used as farmland, with the owners of the surrounding properties to ‘provide stockproof fencing’ to ensure the land could permanently continue to be farmed. The park formed a key part of the air defence of the city during WW2. Recreational value - Given the lack of green spaces in the area, the park and woods are used constantly by walkers, joggers and local families in the Plymstock area as a safe and accessible leisure space. Whether it is children flying kites or owners walking their dogs, the park is constantly used and a large part of why people chose to live in the area. The allotments continue to be in demand - against a background of disappearing allotments versus increasing interest in growing food. Tranquility - The sense of space and place provided by the woods and park are special and essential when considering the nearest similar sized open space is the Broadway car park. Richness of wildlife - Dunstone Woods, Park and the larger trees in surrounding gardens provide the habitat for a diverse population of rare and endangered bats.

**Nomination 6**

The Plymouth Plan states that everyone will have access to high quality natural space within 400m of where they live. The map shown on page 9 of the Plymstock Toolkit clearly shows the significance of this open space in respect of this policy. The site is also designated ‘Local Greenspace’ by Plymouth City Council Green Space Strategy 2008-2023. With commanding views across the city and beyond Dunstone Green, is a beautiful, well-used public space. It is one of the only green spaces in Elburton and is situated next to Dunstone Woods, which is an ancient woodland. It provides recreational facilities for many different users including dog walkers, families and youth groups (Cubs, Guides, Brownies etc.). The space is also used by local schools for field trips in support of the national curriculum. The space can be easily accessed from many residential areas without needing to cross a main road enabling children to enjoy independent outside play. The land is crossed by a Public Footpath enabling access from Plymstock to Elburton avoiding most roads. There is a rich biodiversity in this area given the proximity of the woods. Owls, birds of prey, woodpeckers. Slow worms and significantly hedgehogs are in abundance. This is of particular importance of the UK’s first hedgehog reserve in Warwickshire. Perhaps Plymouth should follow their lead in protecting this endangered animal.

**Nomination 7**

Beauty The view of the Plymouth Sound from the field is spectacular and is extremely revitalizing! Historic Significance There is a monk’s way passing through the field and extends into Dunstone Woods. Recreational value I walk my dog every day up on the field and the benefit I get from the relaxation is beyond words, tranquillity. It is a wonderful place to escape from the noise of the main road we live on richness of wildlife. I have seen woodpeckers, hedgehogs, badgers and many other forms of wildlife.

**Nomination 8**

This field and woods are a haven for wildlife. We live next to the field and there are bat nests, dormice, foxes, insects and birds. The local community use this field to walk dogs, socialise, and take their children to play. The views are spectacular looking right across Plymouth Sound. A very necessary greenspace for the local community.
Site Name: Paradise Field (Albermarle Villas, Devonport Playing Fields)
Site Number: 109

Description of the site:

This is a medium sized, simple shaped site in Devonport, southwest Plymouth. It is a southern sloping area of mown grass, surrounded by walls and a hedgerow to the north. The site is overlooked by detached Victorian housing to the east and by a college to the south, it is also overlooked by the old college building (grade two listed) to the west which is now being converted into luxury apartments. There are long views from the site to the south and south east, of the River Tamar, Brickfields recreation ground and the areas of Stonehouse, the city centre and Mount Wise.

Ownership: PCC

Community the site serves: Ernesettle Neighbourhood

Site Plan:
Is the site a vast tract of land? No, it is a small site that has clear boundaries defined by hedgerows and strengthened by roads, which encircle the site.

Is the site ‘local in character’? The site is overlooked by detached Victorian housing to the east and by a college to the south, it is also overlooked by the old college building (grade two listed) to the west, which is now being converted into luxury apartments. There are long views from the site to the south and south east, of the River Tamar, Brickfields recreation ground and the areas of Stonehouse, the city centre and Mount Wise.

How does it connect to the surrounding communities? The site is surrounded by roads, beyond these roads there is open space and flats to the north, detached housing to the east, the college of further education to the south and the old college building under conversion to the west. It also acts as a separation buffer to break up the surrounding dense urban form and allows views southwards across the city. It also acts as a local recreational space.

Planning history

Does the site have planning permission? No

Is it proposed for allocation in the JLP for Housing/Employment? No

Evidence that the green area is ‘demonstrably special’ to the local community (NPPF para 77 bullet 2)

Support from Local Councillors: Yes

Evidence of support from Local Councillors, local community: Paradise Field received numerous nominations from the local community, clearly demonstrating the importance of the site to the residents of Plymouth. Residents have said the site is “The jewel in the crown of Stoke Damerel with far reaching views to the Sound between listed Albemarle Villas” and “a most pleasurable experience”. Further examples of the representation received can be found in Appendix 1.

JLP Evidence base relevant to sites special qualities that justify designation:

Beauty –

The 2017 Open Space Assessment (EN34) assessed the site as being visible from the adjoining roads and as providing views of Plymouth City and the wider landscape, including the local area.

Figure 2.4 Strategically important skylines and landmarks of The Plymouth and Plymouth Urban Fringe Landscape Seascape Assessment (EN22) shows the site located within area of relative high intervisibility with the rest of the city and surrounding land including the Tamar Valley AONB (see snippet below, site indicated in red dashed line):
Historic Significance –

The site forms part of a conservation area (EN34).

The Greenscape Assessment of 2004 lists the following historic interests for the site and its context:
Whilst there is no significant known interest, the Site and Monuments Record includes the following entries:
- ARP post on the southern edge of the site
- Albemarle Villas to the east all of which are Grade II listed
- College of Further Education to the west which is Grade II listed.

Recreational Value –

The 2017 Open Space Assessment identifies the site as an area for informal recreation, especially dog walking. The site is accessed through gaps in the boundary hedge and there are various desire lines visible across the site. The site seems to accommodate a regular flow of people.

The site is identified within the 2004 Greenspace assessment as of Neighbourhood value for Informal recreation and Sports/other organised activities. This site is important for informal and formal recreation purposes; it also acts as a separation buffer to break up the surrounding dense urban form. The greenspace also allows views southwards across the city. The site has also been used as a Playing Field for two pitches. The site can be accessed by foot from its western edge; there is also a gap in the hedge to the north of the site allowing access. Vehicles can park on the surrounding roads.

Richness of Wildlife –

The site is a feature of the biodiversity network that acts as a stepping stone between sites. It contains amenity grassland and has records of Bluebells, Song Thrush and Twiggy Mullein.

Need for local greenspace designation (NPPF para 76 special circumstance test)

What is the justified need for this LGS: The site is extensively used by people for informal recreation, mainly dog walking. There is clear support from the community to designate this area as a Local Green Space. Further the site assist in shaping the setting and appearance of Plymouth and makes a positive contribution to direct surrounding streetscene.

Further the Open Space Assessment 2017 (EN34) provides the following (site indicated in red dashed line):
A note on interpretation: Accessibility buffers of 400m have been applied to all of the publicly accessible sites in this typology. These buffers have been coloured up by the value and quality rating for each site. Buffers have been drawn sequentially in the order shown in the legend to ensure that any ++ ratings are shown on top.

The snippet shows that the site provides green space in an area where there is a lack in provision.

The snippet indicates that the site delivers a relatively high number of green space functions.

The snippet shows the site to be located within an area of high deprivation.
The information shown above demonstrates the importance of the local green space in this location as it delivers services to a community that has high levels of deprivation.

**Recommendation:** This site meets the 6 criteria of the LGS designation process and is demonstrably special to local communities. It is therefore recommended that this site is designated for its Recreational Value.

**Further sources and links**

The Plymouth and Plymouth Urban Fringe Landscape Seascape Assessment (EN22):
- [https://www.plymouth.gov.uk/sites/default/files/PlymouthAndPlymouthUrbanFringeLandscapeAndSeascapeAssessmentChapters1to3.pdf](https://www.plymouth.gov.uk/sites/default/files/PlymouthAndPlymouthUrbanFringeLandscapeAndSeascapeAssessmentChapters1to3.pdf)
- [https://www.plymouth.gov.uk/sites/default/files/PlymouthAndPlymouthUrbanFringeLandscapeAndSeascapeAssessmentChapter4Onwards.pdf](https://www.plymouth.gov.uk/sites/default/files/PlymouthAndPlymouthUrbanFringeLandscapeAndSeascapeAssessmentChapter4Onwards.pdf)

Plymouth Open Space Assessment 2017 (EN34):
- [http://web.plymouth.gov.uk/PPAOpenspacereport.pdf](http://web.plymouth.gov.uk/PPAOpenspacereport.pdf)
- [http://web.plymouth.gov.uk/PPAOpenspaceappendix2.pdf](http://web.plymouth.gov.uk/PPAOpenspaceappendix2.pdf)
Appendix 1

Some examples of nominations made demonstrating the sites importance to the community:

<table>
<thead>
<tr>
<th>Nomination 1</th>
<th>The land satisfies all the criteria.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1. Beauty - the green space contributes to the unique identity of Stoke with its historic stone walls and open views. It is a prominent site framed by a row of grade II listed buildings on one side Albemarle Villas a sweep of mature trees with glimpses of another Foulston gem St Michael's lodge - to the north and the distinguished Art and Technical College on the west. The view to the south has been partially marred by the tall building in the City College grounds but there are still inspiring views to Plymouth Sound and across the River Tamar to Mount Edgcumbe. Its beauty attracted the famous architect and artist Thomas Allom in 1837 who depicted Albemarle Villas as a pastoral scene with a shepherd in the field. (picture attached) The land is a natural extension of Devonport Park a Victorian Park opened in 1858 and registered by English Heritage as a Park and Garden of Special Historic Interest. The green space provides local people with a vital connection to nature and the seasons. It looks particularly attractive when covered in wildflowers.</td>
</tr>
<tr>
<td></td>
<td>2. Historic Significance - the land is within the Stoke Conservation Area. It has been at the heart of the community for hundreds of years it was glebe land belonging to the parish of Stoke Damerel Church. In 1898 it was sold by the vicar to the borough of Devonport and was probably used by local people to graze animals. It is an integral part of a collection of architecturally significant buildings Albemarle Villas and St Michael's Lodge were designed by John Foulston and praised by historian Nicholas Pevsner for displaying the neo classical spirit and the Art and Technical College is significant for its Netherland Renaissance style. In recent years the land has been used as an informal playing field and many local people have fond memories having sports days on it. It has also been used by the City College for surveying andaby local people for informal recreation. It is currently the subject of a Town and Village Green application.</td>
</tr>
<tr>
<td></td>
<td>3. Recreational Value - The land is precious to the community for informal play ball games, picnics, making daisy chains, kite flying, dog walking, quiet contemplation in a less formal setting than the nearby park. It complements the more manicured parkland. It makes a significant contribution to the health and wellbeing of the local community. When it was proposed for development the council received 199 objections.</td>
</tr>
<tr>
<td></td>
<td>4. Tranquillity - although bordered by roads on two sides and quieter lanes on the remaining sides, the land is big enough and sufficiently enclosed to provide a sense of peace and closeness to nature. This is increasingly recognised as crucial for a sense of wellbeing and good mental health. The open aspect of the site with its inspiring views across the River Tamar into Cornwall and across Plymouth Sound together with its framing by mature trees on three sides, create a sense of freedom and connection with the natural world sometimes difficult to find in a city. Its un-cultivated appearance is conducive to mindfulness and contemplation and contributes to the quality of life of local people.</td>
</tr>
<tr>
<td></td>
<td>5. Wildlife - We believe the site has never been ploughed therefore may have a species rich grassland. The site is bordered by several hundred meters of mixed hedging and scruffy margins that provide a valuable habitat for birds and small mammals in particular the endangered hedgehogs. Wildflowers grow on the main grass area but also on the margins, providing valuable food for bees and butterflies. Buzzards are regularly seen overhead and owls are seen locally too all reliant on the food source supported by this and other green spaces in Stoke. The site is a valuable link in the wildlife corridor and biodiversity network stretching from Devonport Park through the field and hedges of the land at Paradise Road to the scrub, woodland and grass round City College and the land bordering the edges of King’s Road.</td>
</tr>
</tbody>
</table>

| Nomination 2 | I am raising this site as an area to be recognised as a Designated Green Space. I have received feedback on this site from 3 other people as well as myself. This area of field has been open and unbuilt on for a good number of years. It is neatly hedged off from the surrounding traffic and as such has developed a meadow-like quality which is remarkable in the city and managed to retain its sense of protected green space. It is the meadow-like quality that all the feedback I have received points to and which all parties wanted preserved whether this be as Designated Green Space or as even a Site of Scientific Interest or a Local Nature Reserve. A case |
might be made that because of its proximity to Devonport Park then the city could afford to lose
this land under building. This should be resisted. The nature of the site is quite different from the
managed environment of the Park. One person was adamant that this was like wild land and it
needed to remain so. It also forms a natural back drop to the beauty of what is the old Devonport
Technical College which is its own little architectural gem in the area. The two sites form a pair
in a way.

Nomination 3

Beauty - This field is a plain pasture field in the city centre nestled between listed buildings of
great architectural significance and provides uninterrupted views to the water, Plymouth
breakwater and Mt Edgcumbe. This is a beautiful, almost unspoilt vista showcasing green space
and beautiful buildings, one of the finest in Plymouth and has been like this for centuries. To have
such beauty within an urban environment is a rarity that should be preserved. The field has stone
walls and Exmouth St is cobbled. City College, a PCC development, is an unfortunate blot, but
one can still appreciate great beauty from the field. The wildflowers in summer and sunsets
viewed from the field are spectacular.

Historic Significance: The buildings surrounding the field are listed and this makes the land of
great historic significance. Foulston designed the properties in Albemarle Villas, St Michael's Lodge
and St Michael's Terrace around the field. The Old Technical College, a Victorian addition to the
area, is also listed. The field is the central feature of these important properties in Plymouth's
history. It would appear that the field has not been cultivated for centuries, rightly so, given it's
historic significance. This does not mean the land is not used though. To my knowledge it has
been used for school sport, pasture, past-times such as kite flying, dog walking, playing sport
recreationally and as a fairly tranquil place to sit and picnic or walk around.

Recreational Value - The land is used widely for recreation since I have lived in the area for the
last 2 1/4 years. I know that it has been used in this way for more than 20 years as shown by the
sworn affidavits for the recent village green status application. Please refer to this application and
the almost 200 objections to the proposed sale of the field by PCC- comments sent to PCC by
December 2014, as part of my statement. People in the local area value this green space as shown
by these objections to the development of the land. My family uses and has used the land for
walking, running, kite flying, football, picnicking and photography. I have seen others use the land
for dog walking, camping, exercising, socialising and picnicking. I note that PCC have submitted
the only objection to the land being granted Village Green status.

Tranquillity - The fact that people use the field and have objected to PCC plans to sell the land
as above please refer to these objections as part of my statement, means that the local people
and visitors to the site value the land as an open space and find it valuable to their wellbeing.
Green space provides a tranquil haven and to lose such a space would be detrimental to the
tranquility of the local area and the lives of those living in it. Whilst there is Devonport Park
nearby, Devonport Park does not have the views provided by the field at Paradise Road and
beautiful views add to the tranquility of a space as it feels more open and bigger than it actually
is. This is the advantage of the field over Devonport Park, well known to those that use the field.

Richness of Wildlife - I do not have sufficient knowledge of wildlife to comment in detail on this.
Stoke Damerel Conservation Society have surveyed the land for flora and found at least 120
species of plants in the field. Birds certainly flock to the field at certain times, probably to feed
on insects. I have heard that hedgehogs use the field and I have seen them in my garden, which is
relatively close to the field. It is important that hedgehog routes are not interrupted to preserve
them. The hedges on 2 sides of the field provide a habitat for birds and insects. It would be a
wonderful opportunity to use Urban Buzz funding for the field as it prime land for planting
appropriate plants for bees and butterflies.

Nomination 4

The beauty of this field is undeniable set as it is between the busy traffic on two sides and the
historically important buildings of Albemarle Villas and the old Victorian technical college on the
other two sides. Of itself it is a beautiful place to be, to walk or to rest and provides
magnificent views to the buildings on each side and out to Plymouth Sound. The field is used
daily for dog walking, walking, flying kites to name but a few of the uses it is put to, and hence
has huge recreational value. It offers a rare opportunity in such a city to relax in an informal
green space, providing a calming tranquil environment in which to compose oneself. Wildlife is
very well represented as you would expect in a field of this nature. Hedgehogs and their quarry,
small mammals, multitudes of small birds, bees and buzzards ( a very impressive site) all frequent
the field, it also hosts a variety of hedgerows and wild flowers.
Nomination 5

Beauty - The site provides a rare spot of natural 'green' close to the city centre. It provides for views (predominantly from Devonport Park) across Plymouth's vista, to The Sound and across to Cornwall.

Historic Significance - Over the last 200 years this field has been used by numerous local residents for sport and recreation. It is also known as a local historical landmark.

Recreational value - Used by many people for exercise, sport, meeting and many forms of varied recreation. It is rare that there is not someone on the field.

Tranquillity - A rare spot of quiet approx. 1 mile from the centre of a busy and vibrant city.

Richness of wildlife - Many birds, hedgehogs, bees and butterflies on the site. A pleasure in a city.
Description of the site:

Pinewood Close is a large field that is located behind the community of Woolwell. The greenspace contains a strong hedgerow and border to the north, and is directly adjacent to the ancient woodland of the Plym Valley.

Ownership: Private

Community the site serves: Woolwell Neighbourhood
Size, scale and local nature of the site (NPPF Para 77 bullet 1&2)

Site size: 3.16 Ha

Is the site a vast tract of land? No, the site is clearly defined by the ancient woodland that bounds it on three sides and the hedgerow and the road beyond to the north-west.

Is the site ‘local in character’? Yes, the site forms part of the landscape character area (CA10), which creates a natural edge to the city (in the north-east) and provides a boundary to the Woolwell community.

How does it connect to the surrounding communities? The site forms a buffer between the residential area and the Ancient woodland of Hatshill/Holt Wood. It forms part of a wider landscape character area, which provides a secluded and naturalistic valley corridor connecting Plymouth to Dartmoor and which includes a network of sunken rural routes and forest tracks. The site itself abuts some minor residential cul-de-sacs from which the site can be viewed from the public realm. From the wider surroundings, the site helps to shape the wooded backdrop to the north east of the city of Plymouth as it is located on the higher reaches of the valley slopes.

Planning history

Does the site have planning permission? No

Is it proposed for allocation in the JLP for Housing/Employment? No

Evidence that the green area is ‘demonstrably special’ to the local community (NPPF para 77 bullet 2)

Support from Local Councillors: Yes

Evidence of support from Local Councillors, local community: The site was nominated by a member of Bickleigh Parish Council and strong representations were made to the planning application that was refused on this site due to the wildlife value that is demonstrably special to the local community.

Further details can be found in Appendix 1.

JLP Evidence base relevant to sites special qualities that justify designation:

Beauty – The site forms part of a secluded and naturalistic valley corridor. The site, due to its location higher up the valley slopes, assists in shaping the wooded backdrop to the north east of the city of Plymouth, and forms part of the rural transition into South Hams (EN22).

Figure 2.4 of the Plymouth and Plymouth Urban fringe Landscape and Seascape Assessment (EN22) shows the site located on higher ground within the valley. Due to its location on higher ground it offers a higher level of intervisibility with the wider landscape context then the lower valley parts of CA10:

![Diagram showing Plymbridge Woods, Cann Wood and the wooded Bickleigh Vale create a naturalistic edge and wooded skyline above the city. The woodland creates a sense of containment and naturalistic edge to the city.](image-url)
Recreational Value – The site forms part of the wider Plymbridge Wooded Valley landscape character area, which is particularly valued as an accessible greenspace to many Plymouth residents (EN22) but there is no formal public access through the site itself.

Tranquillity – The site forms part of a landscape defined as peaceful and tranquil, where despite its close proximity to the urban area birdsong and the sounds of the river flowing can be heard. The wider valley forms a secluded and naturalistic corridor.

Richness of Wildlife – The site comprises improved grassland and species poor semi-improved grassland. The site is surrounded by hedgebanks, where the original hedgerow shrubs had been allowed to develop into mature and semi-mature trees. The detailed survey information submitted with the Planning Application in the site has provided documented evidence of a range of protected and notable species on the site. This includes breeding birds, reptiles and commuting/foraging bats. Bats found included common pipistrelle, but also low numbers of Annex II species including Western Barbastelle; Greater Horseshoe and Lesser Horseshoe. Nine trees were identified as having features that could potentially be used by roosting bats.

Low numbers of slow worms were found on the site. The semi-improved grassland was considered likely to support a range of invertebrates including pollinators and butterflies.

This site also buffers the Ancient woodland of Hatshill/Holt Wood. This is an important role as this is irreplaceable habitat that needs to receive a high level of protection.

The wider connecting landscape context has been noted to contain valued semi-natural habitats including those designed as part of the Plym Valley Woods County Wildlife Site, as well as large tracts of ancient woodland. As raised above the site abuts the Ancient woodland of Hatshill/Holt Wood.

Need for local greenspace designation (NPPF para 76 special circumstance test)

What is the justified need for this LGS: A local nomination listed the site as fulfilling the following functions:

- buffer between the residential area and the Ancient woodland of Hatshill/Holt Wood
- the presence of rare and endangered species,
- the area is constantly used by very large numbers of Deer
- In addition badgers are moving further afield in the area

The nomination statement can be justified through site-specific surveys and the value of this site as a buffer to the ancient woodland is key.

Recommendation: The site meets the 6 assessment criteria for LGS sites and has evidenced justification of its wildlife value. It is therefore recommended that the site is designated as a Local Green Space for its Richness of Wildlife.

Further sources and links

“7 Acre Field, Roborough, Plymouth. Ecological Appraisal” Green Ecology October 2016 – used to inform application 2169/16/OPA.

The Plymouth and Plymouth Urban Fringe Landscape Seascape Assessment (EN22):

- https://www.plymouth.gov.uk/sites/default/files/PlymouthAndPlymouthUrbanFringeLandscapeAndSeascapeAssessmentChapters1to3.pdf
- https://www.plymouth.gov.uk/sites/default/files/PlymouthAndPlymouthUrbanFringeLandscapeAndSeascapeAssessmentChapter4Onwards.pdf
Overview of the wildlife and amenity related objections raised within local resident representations made in response to the refused planning application 2169/16/OPA. In total 114 letters in objection were received:

### Overview of the wildlife related objections from officer report

- Woodland surrounding site has bats and wildlife which can be adversely impacted, including deer – impacts will be during construction and following occupation
- Adverse landscape impact
- Loss of scarce green space
- Loss of dog walking/children’s play area
- Noise pollution
- Contrary to Bickleigh Neighbourhood Plan
- Contrary to Policy DP3 of South Hams LDF – adverse impact on residential amenity
- Adverse impact on historically important Tramway
- Should have 30m buffer zone around woodland
- No public open space in revised scheme
- Adverse impact on setting of Dartmoor National Park

### Details of Nomination

#### Nomination 1

The proposed Green spaces as shown in the November 2016 Consultation for Woolwell should be viewed as Essential. Areas surrounding Pinewood Drive should also be maintained owing to the proximity to ancient woodland, the presence of rare and endangered species, plus the fact that the area is constantly used by very large numbers of Deer as a ‘Deer run’. In addition badgers are moving further afield in the area and this also needs to be considered.
Site Name: Radford Quarry  
Site Number: 122

Description of the site:

The site is a lakeside and disused quarry. The space is overlooked by a mix of post war housing and industry. Within the main core of the site is predominantly scrub, woodland and rough grass. The exposed rock faces of the disused limestone quarry are prominent features along the skyline. The rock faces of the quarry, limestone grasslands and waters edge consisting of semi natural scrub and woodland are considered of high nature conservation value particularly in respect of their invertebrates and calcareous flora. The site has records of the globally critically endangered species *Nothophantes horridus.*

Ownership: Private

Community the site serves: Plymstock & Turnchapel

Site plan:
Size, scale and local nature of the site (NPPF Para 77 bullet 1&2)

Site size: 5.20 Ha

Is the site a vast tract of land? No, the site is bounded to the north by residential and industrial development, to the south by Radford Park and to the west by Kingfisher Way and Hooe Lake beyond. It is a self-contained site.

Is the site ‘local in character’? Yes, the site forms part of a wider valley landscape, which cuts through a dense area of settlement, with Hooe to the west and Plymstock to the east. The site is overlooked by a mix of post war housing and industry.

How does it connect to the surrounding communities? Radford Quarry has a visual connection with the local community. Houses border two sides of the site, and the well-used public greenspace, Radford Park, borders on the alternate edge.

Planning history

Does the site have planning permission? No

Is it proposed for allocation in the JLP for Housing/Employment? No

Evidence that the green area is ‘demonstrably special’ to the local community (NPPF para 77 bullet 2)

Support from Local Councillors: Yes

Evidence of support from Local Councillors, local community: We received numerous nominations from the local community about the wildlife value of this site, see appendix 1 for details.

JLP Evidence base relevant to sites special qualities that justify designation:

Beauty – The area provides views of Hooe Lake, and into CA 27 Cattewater. The site is overlooked by the settlements of Oreston, Hooe, Plymstock and Turnchapel. Turnchapel includes prominent cliff-top houses overlooking Hooe Lake, the site and the wider Character Area. The site forms part of an area which helps to shape the background of the wider seascape setting to Cattewater (CA 27) and the adjacent residential developments at Torpoint and Plymstock.

Figure 2.4 of the Plymouth and Plymouth Urban fringe Landscape and Seascape Assessment (EN22) shows the site to form a pronounced dip in the landscape with the surrounding development raised above the old quarry level offering it great views across the quarry:

The landform of the site consists exposed rock faces of the disused limestone quarry, which are a prominent feature along the skyline.
Other sensory experiences associated with site include smells of seawater and views to the masts of the many boats moored within Cattewater providing a strong land-sea connection.

**Historic Significance** – The site was historically used as a quarry. The wider landscape context, including the site has been noted as having a strong historic sense of place (EN22).

**Recreational Value** – The site is not officially publically accessible; however desire lines can be seen crossing the quarry floor. Much of the wider landscape context is used for recreation, and includes the Erme-Plym trail, South West Coast Path, Plym Valley Trail and a network of other footpaths (EN22) and views of the quarry can be gained from these routes.

**Tranquillity** – The wider landscape character area, in which the site sits, is defined as tranquil and naturalistic, especially when compared to the surrounding residential development. The site and its wider surroundings have been noted to be a peaceful and tranquil haven within the city (EN22).

**Richness of Wildlife** – The site is a County Wildlife Site, described as Lowland calcareous grassland situated in a disused limestone quarry.

It is also a Biodiversity Network Site. Its key habitats are: Unimproved calcareous grassland, SI grassland, maritime fringe and brackish wetland.

Its key species are: Palmate Newt (WCA 5 S, Bern III) Scaup (WCA 1, UKBAP), Slow-worm (WCA 5 KIS, Bern III, UKBAP), Small Blue (WCA 5 S, UKBAP), Ivy Broomrape (NS), Song Thrush, Linnet, House Sparrow, Bullfinch (UKBAP, Red) Lapwing, Curlew (UKBAP), Dingy Skipper (UKBAP, DeclineD) 2 Amber, 2 DN1, 5 DN2, 1 DN3

Radford Quarry is also home to the Horrid ground-weaver spider (*Nothophantes horridus*). A globally critically endangered species, the Horrid ground-weaver has only ever been recorded at sites in the Plymouth area, including Radford Quarry. The significance of the site for one of the world’s rarest spiders means that protecting Radford Quarry is of global importance for biodiversity. [https://www.buglife.org.uk/blog/matt-shardlow-ceo/horrid-ground-weaver-saved-thanks-mainly-to-buglife-plymouth-city-council](https://www.buglife.org.uk/blog/matt-shardlow-ceo/horrid-ground-weaver-saved-thanks-mainly-to-buglife-plymouth-city-council)

Other Individual species recorded at the site and listed on GGP include:

Dingy Skipper *Erynnis tages* 2004, 2006 (Butterfly Conservation)

Scaup *Aythya marila* 85-87 (CWS Survey)

Eurasian Badger *Meles meles* 2004 Incidental Species Records

Further the wider landscape context, including the site, has been noted to represent a range of habitats forming a complete wildlife corridor stretching from land to sea (EN22).
The site was subject to a planning application and subsequent appeal. This provided surveys that demonstrate the site is utilised by bats and other protected species. The appeal (APP/N1160/A/14/2219907) was dismissed due to the developments impact on biodiversity, character and trees.

**Need for local greenspace designation (NPPF para 76 special circumstance test)**

**What is the justified need for this LGS:**
Due to the sites richness of wildlife, particularly the presence of the Horrid ground-weaver spider, protecting Radford Quarry is of global importance for biodiversity. The Horrid ground-weaver spider is a globally critically endangered species which has only been found in a few sites, including Radford Quarry, all of which are in the Plymouth area.

The 2017 Open Space Assessment sets out the following (site indicated in dashed red line):

![Map snippet showing accessibility buffers and green space functions](image)

A note on interpretation: Accessibility buffers of 400m have been applied to all of the publicly accessible sites in this typology. These buffers have been coloured up by the value and quality rating for each site. Buffers have been drawn sequentially in the order shown in the legend to ensure that any ++ ratings are shown on top.

The map snippet shows that the site is located within an area of green space deficit in value/quality.

![Map snippet showing multi-functionality of green spaces](image)

The snippet indicates that the site delivers a medium number of green space functions.

![Map snippet showing deprivation levels](image)

The snippet shows the site to be located within an area of medium deprivation.
Due to the above the site should be considered to have potential to deliver a green space which could address a local green space deficiency in an area of medium deprivation.

**Recommendation:** The site meets the 6 assessment criteria for the LGS designation and the presence of the critically endangered spider justifies Local Green Space designation due to its demonstrable wildlife value. It is therefore recommended that the site is designated as an LGS for its Richness of Wildlife.

### Further sources and links

**The Plymouth and Plymouth Urban Fringe Landscape Seascape Assessment (EN22):**
- [https://www.plymouth.gov.uk/sites/default/files/PlymouthAndPlymouthUrbanFringeLandscapeAndSeascapeAssessmentChapters1to3.pdf](https://www.plymouth.gov.uk/sites/default/files/PlymouthAndPlymouthUrbanFringeLandscapeAndSeascapeAssessmentChapters1to3.pdf)
- [https://www.plymouth.gov.uk/sites/default/files/PlymouthAndPlymouthUrbanFringeLandscapeAndSeascapeAssessmentChapter4Onwards.pdf](https://www.plymouth.gov.uk/sites/default/files/PlymouthAndPlymouthUrbanFringeLandscapeAndSeascapeAssessmentChapter4Onwards.pdf)

**Plymouth Open Space Assessment 2017 (EN34):**
- [http://web.plymouth.gov.uk/ppaopenspacereport.pdf](http://web.plymouth.gov.uk/ppaopenspacereport.pdf)
- [http://web.plymouth.gov.uk/ppaopenspaceappendix2.pdf](http://web.plymouth.gov.uk/ppaopenspaceappendix2.pdf)
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<td>A tranquil area full of richness in wildlife. It is an area of beauty adjacent to Radford Lake and park by Hooe Lake and therefore near to places of historic significance and now of unique importance to Plymouth.</td>
</tr>
<tr>
<td><strong>Nomination 2</strong></td>
<td>Designated County Wildlife Site, Radford Quarry is adjacent to other wildlife areas all with their own unique biodiversity. Hooe Lake, Radford Park and Woods also Ashery Woods and Radford Lake. The quarry has great significance and importance as it is limestone and supports a wide variety of flora and fauna, as well as the history of limestone quarrying. It is part of the South West Coastal Footpath and therefore should be preserved for all to enjoy.</td>
</tr>
<tr>
<td><strong>Nomination 3</strong></td>
<td>In spring, summer and autumn the quarry is beautiful as it is full of wild flowers and insects. Even in winter it is wild and dramatic. Throughout the year it is a haven of tranquillity - you cannot hear the noise of the city, and in summer the bees and butterflies are stunning. It has great potential for recreational value both for children and bikes, and dog walkers, and also educational value because of the rich and varied wildlife - school children should visit. The whole area around Hooe and Radford Lakes is of considerable historic significance - links to Raleigh and Drake. It is already a designated County Wildlife Site and with the adjoining lakes, park and woods, makes a fantastic green network for wildlife, including bats, badgers, bees, butterflies, invertebrates (including the horrid ground weaver), rare flowers not to mention kingfishers, cormorants, heron, egrets etc. that thrive in this wonderful pocket of our city.</td>
</tr>
<tr>
<td><strong>Nomination 4</strong></td>
<td>Plymouth Plan Toolkit, Greenspace Designation, Plymstock “Radford Park. Radford Woods, Radford Quarry, must all be designated green spaces.”</td>
</tr>
<tr>
<td><strong>Nomination 5</strong></td>
<td>Richness of wild life and historic significance.</td>
</tr>
</tbody>
</table>
Description of the site:

The site is an area of countryside on the edge of Tamerton Foliot. The site consists of a number of fields on a gentle hilly landform sloping towards Tamerton Lake. The space consists of a mix of pasture and arable fields divided by native mix hedges. There are long views across the city and to the rural hinterland.

Ownership: Private

Community the site serves: Tamerton Foliot
Size, Scale And Local Nature Of The Site (NPPF para 77 bullet 1&2)

Site size: 14.13 Ha

Is the site a vast tract of land? Yes. Although the site is not overly large in size the site boundary is not easily defined as the site links out into the wider countryside and cannot easily be identified as different in character or function to other areas of countryside that surrounds it.

Is the site ‘local in character’? Yes, the site could be defined as local in character to the countryside surrounding Tamerton, but there is a lot of countryside in the vicinity that would meet the definition and this includes a vast tract of countryside.

How does it connect to the surrounding communities? Visually links to surrounding communities.

Planning History

Does the site have planning permission? No

Is it proposed for allocation in the JLP for Housing/Employment? No

Evidence that the green area is ‘demonstrably special’ to the local community (NPPF para 77 bullet 2)

Support from Local Councillors:

Evidence of support from Local Councillors, local community: Yes. There were a number of representations for the site.

JLP Evidence base relevant to sites special qualities that justify designation:

Beauty - The site abuts the Tamar Valley AONB and has a visual relationship with this area. Figure 2.4 - Strategically important skylines and landmarks of The Plymouth and Plymouth Urban Fringe Landscape Seascape Assessment (EN22) highlights intervisibility with the Tamar Valley AONB (see snippet below, site shown in dashed red line):

![Image of landscape assessment]

The Plymouth and Plymouth Urban Fringe Landscape and Seascape Assessment (EN22) defines Land North West of Tamerton Foliot as part of CA08: Tamerton Foliot Farmland. This assessment identifies that views on the farmland to the west of Tamerton Foliot, where the site is situated, are more open towards Warleigh Wood. Further the site fabuts the Tamar Valley AONB.

Historic Significance – The site helps to shape the setting of Tamerton Foliot Conservation Area (EN22).

Recreational Value - There is no public access to the site. However the site abuts Tamar Valley Discovery Trail.

Tranquillity - The Landscape Assessment (EN22) defines the area in which the site sits as having a traditional rural feel despite its proximity to urban development. It identifies the site as helping to create a rural and tranquil edge to the settlements of Southway and Tamerton Foliot. Overall the area is described relatively tranquil.
Richness of Wildlife - The site is predominantly agricultural land and therefore of low nature conservation value. There are however some good hedgerows and banks of high nature conservation value.

The site is part of Biodiversity Network Feature (Number 13). It has a key habitat of poor semi-improved grassland/arable & plantation coniferous woodland. Key species are Bluebell (WCA 8 S); Twiggy Mullein (NS) 1 DBAP, 1 Amber, 2 DN3. The rationale for this site is that it is buffering a statutory site (Tamar/Tavy Estuary SSSI)

### Need for local greenspace designation (NPPF para 76 special circumstance test)

**What is the justified need for this LGS:** The site does not meet all of the criteria within the LGS designation process and therefore does not comply with para 77 of the NPPF.

**Recommendation:** The site fails to meet all the 6 LGS designation criteria as it is deemed to be a vast tract of land, not due to its size but as it is very similar in nature to the surrounding farm land. The site does not therefore meet the NPPF tests, it is recommended that this site is not designated as an LGS.

### Further sources and links

The Plymouth and Plymouth Urban Fringe Landscape Seascpe Assessment (EN22):
- [https://www.plymouth.gov.uk/sites/default/files/PlymouthAndPlymouthUrbanFringeLandscapeAndSeascapeAssessmentChapters1to3.pdf](https://www.plymouth.gov.uk/sites/default/files/PlymouthAndPlymouthUrbanFringeLandscapeAndSeascapeAssessmentChapters1to3.pdf)
- [https://www.plymouth.gov.uk/sites/default/files/PlymouthAndPlymouthUrbanFringeLandscapeAndSeascapeAssessmentChapter4Onwards.pdf](https://www.plymouth.gov.uk/sites/default/files/PlymouthAndPlymouthUrbanFringeLandscapeAndSeascapeAssessmentChapter4Onwards.pdf)

Plymouth Open Space Assessment 2017 (EN34):
- [http://web.plymouth.gov.uk/ppaopenspacereport.pdf](http://web.plymouth.gov.uk/ppaopenspacereport.pdf)
- [http://web.plymouth.gov.uk/ppaopenspaceappendix2.pdf](http://web.plymouth.gov.uk/ppaopenspaceappendix2.pdf)
<table>
<thead>
<tr>
<th>Site ref</th>
<th>Site</th>
<th>Use under consideration</th>
<th>Summary reason for site not being c/f to Reg 19 plan</th>
<th>Identified as LGS? site (yes / no)</th>
</tr>
</thead>
<tbody>
<tr>
<td>0020</td>
<td>TAVR Centre, Prospect Place, West Hoe</td>
<td>Housing</td>
<td>No land owner support; no delivery strategy</td>
<td>No</td>
</tr>
<tr>
<td>0024</td>
<td>Commercial, Elphinstone &amp; Phoenix Wharfs</td>
<td>Mixed use opportunities to support the enhanced use of the site for water sports, maritime events and leisure and tourism, including complementary enabling commercial uses.</td>
<td>Deliverability concerns - but identify as opportunity site</td>
<td>No</td>
</tr>
<tr>
<td>0024b</td>
<td>Lambhay Hill car park</td>
<td>Housing</td>
<td>Lack of evidence of deliverability; historic environment concerns</td>
<td>No</td>
</tr>
<tr>
<td>0025</td>
<td>North Quay House II</td>
<td>As in Sutton Harbour AAP and/or Sutton Harbour vision document</td>
<td>Site area below threshold for allocation</td>
<td>No</td>
</tr>
<tr>
<td>0026</td>
<td>Exeter Street</td>
<td>Mixed use - commercial / housing</td>
<td>Lack of evidence of deliverability. However development would be strongly supported given regeneration benefits. Therefore identify as Opportunity Site</td>
<td>No</td>
</tr>
<tr>
<td>0071b</td>
<td>Land at St. Levan Gate (including gap sites on St Levans Road)</td>
<td>Car parking for dockyard and infill; housing</td>
<td>Not supported by landowner &amp; MoD given strategic requirements for Naval Base; no strategy for delivery</td>
<td>No</td>
</tr>
<tr>
<td>0078</td>
<td>Princess Yachts, South Yard</td>
<td>Marine employment</td>
<td>Commitment site (most of consent implemented)</td>
<td>No</td>
</tr>
<tr>
<td>0089</td>
<td>R/O Acterna Way Burrington Way</td>
<td>Employment (B1b,c, B2, B8 use classes)</td>
<td>Expansion site which can be covered by general policy</td>
<td>No</td>
</tr>
<tr>
<td>0116</td>
<td>Embankment Boatyard, Embankment Road</td>
<td>Mixed use - Housing and marine related uses</td>
<td>Flood risk; site not justified for bringing forward in absence of delivery strategy</td>
<td>No</td>
</tr>
<tr>
<td>0118</td>
<td>Mount Gould Hospital</td>
<td>Mixed use - health / housing</td>
<td>Too much uncertainty about delivery</td>
<td>No</td>
</tr>
<tr>
<td>0140</td>
<td>Plymouth Boat Yard</td>
<td>Mixed use - commercial and housing</td>
<td>Loss of marine employment focus; unsuitable housing site</td>
<td>No</td>
</tr>
<tr>
<td>0146</td>
<td>Land East Stenlake Terrace</td>
<td>Housing</td>
<td>Not considered deliverable; highway constraints; unsuitable site</td>
<td>No</td>
</tr>
<tr>
<td>0173</td>
<td>Land at Pennycomequick</td>
<td>Housing</td>
<td>Not available; deliverability contraints</td>
<td>No</td>
</tr>
<tr>
<td>0187</td>
<td>Looseleigh Lane</td>
<td>Housing</td>
<td>Historic environment constraints - test through DM process if to come forward</td>
<td>No</td>
</tr>
<tr>
<td>0188</td>
<td>Land at Cradon Close</td>
<td>Housing</td>
<td>Site area below threshold for allocation</td>
<td>No</td>
</tr>
<tr>
<td>0191</td>
<td>Christian Mill Business Park</td>
<td>Employment</td>
<td>Site area below threshold for allocation</td>
<td>No</td>
</tr>
<tr>
<td>0206</td>
<td>The White Cottage and Holtwood, Plymbridge Road, Glenholt</td>
<td>Housing</td>
<td>Commitment site</td>
<td>No</td>
</tr>
<tr>
<td>0258</td>
<td>Land off Darklake View</td>
<td>Employment (B1b,c, B2, B8 use classes)</td>
<td>Not supported by landowner who has previously identified the site for housing, which is considered an inappropriate use of a site at end of industrial estate; no plans to CPO; site not needed to meet employment floorspace requirement</td>
<td>No</td>
</tr>
<tr>
<td>0276</td>
<td>Crownhill Fort</td>
<td>Heritage &amp; visitor use</td>
<td>No specific proposals; use and enhancement can be dealt with through general policy provisions for historic environment</td>
<td>No</td>
</tr>
<tr>
<td>0287</td>
<td>Motor Transport Section, North Yard</td>
<td>Housing</td>
<td>No land owner support; no delivery strategy</td>
<td>No</td>
</tr>
<tr>
<td>0303b</td>
<td>North Prospect redevelopment phase 3</td>
<td>Housing</td>
<td>Commitment site</td>
<td>No</td>
</tr>
<tr>
<td>0311</td>
<td>Scout Hut, Delamere Road</td>
<td>Housing</td>
<td>Site below threshold once community asset transfer land taken into account</td>
<td>No</td>
</tr>
<tr>
<td>0342</td>
<td>Radford Quarry</td>
<td>Housing</td>
<td>Unacceptable natural infrastructure impacts; inadequate access (recent planning refusal upheld at appeal)</td>
<td>Yes</td>
</tr>
<tr>
<td>0349</td>
<td>Land to South of Cann House, Tamerton Foliot Road</td>
<td>Housing</td>
<td>Greenspace constraints</td>
<td>No</td>
</tr>
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<tr>
<td>0362</td>
<td>Land to west of Belliver Industrial Estate</td>
<td>Employment (B1b,c, B2, B8 use classes)</td>
<td>Sufficient suitable employment land for B Use Classes identified without need to allocate this greenfield site. Solar panel consent in place for site.</td>
<td>No</td>
</tr>
<tr>
<td>0393</td>
<td>Parkway Sports &amp; Social Club, Ernesettle</td>
<td>Sports improvements</td>
<td>Covered by general policy protection for sports</td>
<td>No</td>
</tr>
<tr>
<td>0398</td>
<td>Eaton Business Park, Estover</td>
<td>Housing</td>
<td>Loss of employment land; impact on opportunity for re-establishing aviation use at airport site</td>
<td>No</td>
</tr>
<tr>
<td>0399</td>
<td>Airport Business Centre</td>
<td>Housing</td>
<td>Loss of employment land; impact on opportunity for re-establishing aviation use at airport site</td>
<td>No</td>
</tr>
<tr>
<td>0401</td>
<td>Land at Thornbury Road</td>
<td>Industrial uses or alternatively residential C3 providing it can be demonstrated that such development would not compromise future operation of Plymouth Airport.</td>
<td>Loss of employment land; impact on opportunity for re-establishing aviation use at airport site</td>
<td>No</td>
</tr>
<tr>
<td>0403</td>
<td>Cann Lodge, Tamerton Foliot</td>
<td>Housing</td>
<td>Greenspace constraints</td>
<td>No</td>
</tr>
<tr>
<td>0404</td>
<td>Land south of Coombe Lane</td>
<td>Housing</td>
<td>Unsustainable location for development; unacceptable natural infrastructure impacts</td>
<td>No</td>
</tr>
<tr>
<td>0405</td>
<td>Land at West Trehills, Allern Lane, Tamerton Foliot</td>
<td>Housing</td>
<td>Unsustainable location for development; unacceptable natural infrastructure impacts</td>
<td>Yes</td>
</tr>
<tr>
<td>0409</td>
<td>Land South of Pinewood Drive, Woolwell</td>
<td>Housing</td>
<td>Site not needed; greenspace constraints. An integrated approach to the delivery of urban extension at Woolwell is essential to ensure that the overall development is managed in a way that is supported by existing and planned infrastructure. Other more suitable sites are available to achieve this outcome.</td>
<td>Yes</td>
</tr>
<tr>
<td>0411</td>
<td>Valley Field East of Broadley Ind. Pk, Roborough</td>
<td>Employment (B1b,c, B2, B8)</td>
<td>Sufficient suitable employment land for B Use Classes identified without need to allocate this greenfield site.</td>
<td>No</td>
</tr>
<tr>
<td>0412</td>
<td>Field East of Roborough Farm</td>
<td>Employment</td>
<td>Sufficient suitable employment land for B Use Classes identified without need to allocate this greenfield site. Site is adjacent to the Tamar Valley AONB boundary. The site is relatively isolated and any development could have an impact on landscape character.</td>
<td>No</td>
</tr>
<tr>
<td>0412</td>
<td>Field East of Roborough Farm</td>
<td>Housing</td>
<td>Site not well related to public transport or residential communities. Site is adjacent to the Tamar Valley AONB boundary. The site is relatively isolated and any development could have an impact on landscape character. (This site was granted planning permission by S Hams District Council for 8 commercial units and 3 dwellings on 21 July 2017).</td>
<td>No</td>
</tr>
<tr>
<td>0413</td>
<td>Field East of Haxter Lodge</td>
<td>Employment</td>
<td>Sufficient suitable employment land for B Use Classes identified without need to allocate this greenfield site. Site is adjacent to the Tamar Valley AONB boundary. The site is relatively isolated and any development could have an impact on landscape character.</td>
<td>No</td>
</tr>
<tr>
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</tr>
<tr>
<td>0414 (SH_04_18_16)</td>
<td>Field North of Roborough Farm</td>
<td>Employment</td>
<td>Sufficient suitable employment land for B Use Classes identified without need to allocate this greenfield site. Site is adjacent to the Tamar Valley AONB boundary. The site is relatively isolated and any development could have an impact on landscape character.</td>
<td>No</td>
</tr>
<tr>
<td>0416 (SH_04_11_08/13)</td>
<td>Land off Allern Lane, Tamerton Foliot</td>
<td>Housing</td>
<td>Unsustainable location for development; unacceptable natural infrastructure impacts. Unacceptable impact on landscape, including Tamar Valley AONB. Impact is considered to be demonstrably and significantly adverse, particularly in the context of views to the site from residential areas to the south east which are currently of an overwhelmingly rural area.</td>
<td>No</td>
</tr>
<tr>
<td>0419 (SH_49_06_08/13)</td>
<td>Old Newnham Farm, Plympton</td>
<td>Housing</td>
<td>Significant constraints relating to: landscape - development being visually intrusive to the existing character of the area, notwithstanding the presence of the new link road on eastern boundary of the site which improved the road network and access to Hermonden Mine - retaining the visually important parts of the site for open space uses would reduce the developable area; not well related to services and facilities; proximity of collection of Grade 1 and 2 listed buildings at Old Newnham Farm is likely to limit the developable area of the site to the more prominent visually intrusive areas; and flooding where extensive area of Flood Zones 2 And 3 associated with the Smallhanger Brook bisects the site, separating the smaller southern part of the site adjoining West Park Hill from the larger, northern part of the site that adjoins the new link road.</td>
<td>No</td>
</tr>
<tr>
<td>0442</td>
<td>Land north of Hazeldene Quarry</td>
<td>Housing</td>
<td>Not deliverable in plan period</td>
<td>No</td>
</tr>
<tr>
<td>0587a</td>
<td>Plymouth Airport</td>
<td>Housing led mixed use</td>
<td>Site safeguarded for aviation uses</td>
<td>No</td>
</tr>
<tr>
<td>0588</td>
<td>Former Environ Factory, Ernesettle</td>
<td>Employment</td>
<td>Site occupied</td>
<td>No</td>
</tr>
<tr>
<td>0730a</td>
<td>Land off Plymbridge Road</td>
<td>Housing</td>
<td>Unsustainable location for development; unacceptable natural infrastructure impacts</td>
<td>No</td>
</tr>
<tr>
<td>0740c</td>
<td>Plymstock Quarry centre</td>
<td>Housing</td>
<td>Needs to be tested in context of updated masterplan to fully understand the implications for the wider development. This site is covered in wider allocation</td>
<td>No</td>
</tr>
<tr>
<td>0740d</td>
<td>Plymstock Quarry east</td>
<td>Housing</td>
<td>Unsuitable location for housing. Loss of greenspace. Within Saltram Country Park</td>
<td>No</td>
</tr>
<tr>
<td>0742</td>
<td>Land at Riga Terrace</td>
<td>Housing</td>
<td>Highly constrained site; deliverability issues</td>
<td>No</td>
</tr>
<tr>
<td>0759</td>
<td>Ashery Drive Garages, Hooe</td>
<td>Housing</td>
<td>Site too constrained - but can test in more detail through application process</td>
<td>No</td>
</tr>
<tr>
<td>0766</td>
<td>Jeffery Close</td>
<td>Housing</td>
<td>Site area below threshold for allocation</td>
<td>No</td>
</tr>
<tr>
<td>0793a</td>
<td>Seaton Neighbourhood west</td>
<td>Housing</td>
<td>Needs to be tested in context of updated masterplan to fully understand the implications for the wider development. This site is covered in wider allocation</td>
<td>No</td>
</tr>
<tr>
<td>0793b</td>
<td>Seaton Neighbourhood east</td>
<td>Housing</td>
<td>Needs to be tested in context of updated masterplan to fully understand the implications for the wider development. This site is covered in wider allocation</td>
<td>No</td>
</tr>
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</tr>
<tr>
<td>0799</td>
<td>Plymouth International Medical and Technology Park</td>
<td>Employment (predominantly B1 use classes)</td>
<td>Much of the site developed already - the available sites are however to be allocated</td>
<td>No</td>
</tr>
<tr>
<td>0840 b</td>
<td>Land at Staddiscombe Road/Goosewell Road</td>
<td>Housing / housing led mixed use (small convenience store)</td>
<td>Local greenspace constraints; not available</td>
<td>No</td>
</tr>
<tr>
<td>0844</td>
<td>Devonport, land at Paradise Road</td>
<td>Housing or open space</td>
<td>Local greenspace designation</td>
<td>Yes</td>
</tr>
<tr>
<td>0845</td>
<td>Fort Austin Depot</td>
<td>Community use</td>
<td>No specific proposals; use and enhancement can be dealt with through general policy provisions for historic environment</td>
<td>No</td>
</tr>
<tr>
<td>0846</td>
<td>Woodland Fort</td>
<td>Community use</td>
<td>No specific proposals; use and enhancement can be dealt with through general policy provisions for historic environment</td>
<td>No</td>
</tr>
<tr>
<td>0852</td>
<td>Underhill Engineering, Plymbridge Road</td>
<td>Employment</td>
<td>Part of curtilage of existing business</td>
<td>No</td>
</tr>
<tr>
<td>0854</td>
<td>Open space adjacent to Drake Circus</td>
<td>Pavilion building - leisure / food and drink uses</td>
<td>Site area below threshold for allocation</td>
<td>No</td>
</tr>
<tr>
<td>0879</td>
<td>Land at Sherford Road</td>
<td>Housing</td>
<td>Policy constrained - greenspace value, wildlife corridor</td>
<td>No</td>
</tr>
<tr>
<td>0897</td>
<td>Elburton East Edge</td>
<td>Housing</td>
<td>Greenspace impacts; unnecessary eastward extension of city</td>
<td>No</td>
</tr>
<tr>
<td>0906</td>
<td>South Yard</td>
<td>Marine employment</td>
<td>Not supported by landowner &amp; MoD given strategic requirements for Naval Base; no strategy for delivery</td>
<td>No</td>
</tr>
<tr>
<td>0909</td>
<td>Richmond Walk</td>
<td>Mixed use</td>
<td>General employment policies sufficient; no specific proposal being put forward for site</td>
<td>No</td>
</tr>
<tr>
<td>0912</td>
<td>Land at Northolt Avenue, Ernsettle</td>
<td>Employment (B1b,c, B2, B8 use classes)</td>
<td>Commitment site</td>
<td>No</td>
</tr>
<tr>
<td>0916</td>
<td>Stonehouse Creek Car Park</td>
<td>Car parking for Royal William Yard</td>
<td>Not a sustainable site for housing development; existing use of car park does not require allocation in plan; flood zone 2.</td>
<td>No</td>
</tr>
<tr>
<td>0917</td>
<td>Land North of Lake View Close</td>
<td>Housing</td>
<td>Unacceptable natural infrastructure impacts.</td>
<td>Yes</td>
</tr>
<tr>
<td>0935</td>
<td>Paddock site, Estover Industrial Estate</td>
<td>Employment (B1b,c, B2, B8 use classes)</td>
<td>Potential future employment supply but not currently required</td>
<td>No</td>
</tr>
<tr>
<td>0947</td>
<td>Milehouse Bus Depot</td>
<td>Mixed use - employment / transport</td>
<td>Too much uncertainty over deliverability; lack of support of transport operator.</td>
<td>No</td>
</tr>
<tr>
<td>0948</td>
<td>Land South of Stoggy Lane</td>
<td>Housing</td>
<td>Important buffer area - greenspace.</td>
<td>Yes</td>
</tr>
<tr>
<td>0950</td>
<td>Vets and finance services office, Central Park</td>
<td>Sports related development</td>
<td>No clear proposition or deliverability identified</td>
<td>No</td>
</tr>
<tr>
<td>0953</td>
<td>West of Ernesettle Lane</td>
<td>Employment</td>
<td>Alternative sports use proposed (SA relates to the sports use)</td>
<td>No</td>
</tr>
<tr>
<td>0956</td>
<td>Land at Plympton House (northern part of site)</td>
<td>Housing</td>
<td>The site is not considered suitable given the historic and greenspace context (including part registered park and garden)</td>
<td>Yes</td>
</tr>
<tr>
<td>0958</td>
<td>Site off Weston Mill Lane</td>
<td>Gypsy &amp; traveller site</td>
<td>Site area below threshold for allocation</td>
<td>No</td>
</tr>
<tr>
<td>0959</td>
<td>PML site, Leigham Street</td>
<td>Housing or housing led mixed use</td>
<td>No land owner support; no delivery strategy for relocation of existing use.</td>
<td>No</td>
</tr>
<tr>
<td>0961</td>
<td>Mayflower Street West Armada Centre</td>
<td>Mixed use - commercial / housing / office</td>
<td>Deliverability concerns - but identify as opportunity site</td>
<td>No</td>
</tr>
<tr>
<td>0967 b</td>
<td>Sutton Road East</td>
<td>Mixed use - housing / employment</td>
<td>Too much uncertainty about delivery, but identify as opportunity site</td>
<td>No</td>
</tr>
<tr>
<td>0972</td>
<td>Social club site, Milehouse Bus Depot</td>
<td>Housing</td>
<td>Objections from landowner to residential use, site not available</td>
<td>No</td>
</tr>
<tr>
<td>0981</td>
<td>Elburton (land at Candish Drive)</td>
<td>Housing</td>
<td>Buffer site between Sherford and Elburton, impact on landscape</td>
<td>No</td>
</tr>
<tr>
<td>Site ref</td>
<td>Site</td>
<td>Use under consideration</td>
<td>Summary reason for site not being c/f to Reg 19 plan</td>
<td>Identified as LGS? site (yes / no)</td>
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</tr>
<tr>
<td>0985</td>
<td>Land West of Broadley Park Road</td>
<td>Employment</td>
<td>Commitment site</td>
<td>No</td>
</tr>
<tr>
<td>0986</td>
<td>Land North of Belliver Way Industrial Estate</td>
<td>Employment (B1b,c, B2, B8 use classes)</td>
<td>Solar panel farm consent; site not needed for supply; site forms part of strategic landscape setting of city</td>
<td>No</td>
</tr>
<tr>
<td>0990</td>
<td>Land at Keyham Road</td>
<td>Mixed use - housing, food retail and car parking for dockyard</td>
<td>Not supported by landowner &amp; MoD given strategic requirements for Naval Base; no strategy for delivery</td>
<td>No</td>
</tr>
<tr>
<td>0992</td>
<td>Land at Mowhay Road / Coombe Farm</td>
<td>Greenspace improvements incorporating gypsy &amp; traveller site</td>
<td>Not needed to meet requirement for gypsies and travellers</td>
<td>No</td>
</tr>
<tr>
<td>0992</td>
<td>Land at Mowhay Road / Coombe Farm</td>
<td>Housing, with open space improvements</td>
<td>Greenspace constraints; deliverability concerns.</td>
<td>No</td>
</tr>
<tr>
<td>0996</td>
<td>Land at Outland Road Depot</td>
<td>Sports and leisure</td>
<td>No clear proposition or deliverability yet identified</td>
<td>No</td>
</tr>
<tr>
<td>0996</td>
<td>Land at Outland Road Depot</td>
<td>Garden centre</td>
<td>No clear proposition or deliverability yet identified</td>
<td>No</td>
</tr>
<tr>
<td>0997</td>
<td>Agaton Fort</td>
<td>Opportunity for community use</td>
<td>No specific proposals; use and enhancement can be dealt with through general policy provisions for historic environment</td>
<td>No</td>
</tr>
<tr>
<td>0999</td>
<td>Chittleburn Hill</td>
<td>Park and Ride</td>
<td>Insufficient business case at present for park and ride. Site is detached from built up area of Plymouth. Adjacent to light industrial uses, the site is prominent on rising land. Not suitable for housing. Sufficient suitable employment land for B Use Classes identified without need to allocate this greenfield site. No evidence that a Park and Ride facility on this site is deliverable.</td>
<td>No</td>
</tr>
<tr>
<td>1001</td>
<td>St Budeaux Methodist Church &amp; Victoria Snooker Centre</td>
<td>Mixed use - housing / community / worship space</td>
<td>These are 2 separate sites; both are below threshold</td>
<td>No</td>
</tr>
<tr>
<td>1004</td>
<td>Police &amp; Fire Station, Glen Road, Plympton</td>
<td>Unspecified</td>
<td>No specific proposal advocated; deliverability concerns and flood risk issues</td>
<td>No</td>
</tr>
<tr>
<td>1005</td>
<td>Land at Wallaton Grove, Crownhill</td>
<td>Housing</td>
<td>Important community greenspace; site not available</td>
<td>No</td>
</tr>
<tr>
<td>1006</td>
<td>Land at Shakespeare Road, Crownhill</td>
<td>Housing</td>
<td>Important community greenspace; site not available</td>
<td>No</td>
</tr>
<tr>
<td>1007</td>
<td>Land at Trevithick Road, Kings Tamerton</td>
<td>Housing</td>
<td>Important community greenspace; site not available</td>
<td>No</td>
</tr>
<tr>
<td>1008</td>
<td>Land at Bladder Meadow, Crownhill</td>
<td>Housing</td>
<td>Important community greenspace; site not available</td>
<td>No</td>
</tr>
<tr>
<td>1009</td>
<td>Land at corner of Pattinson Close, Plymbridge</td>
<td>Housing</td>
<td>Important community greenspace; site not available</td>
<td>No</td>
</tr>
<tr>
<td>1011</td>
<td>Tesco Roborough</td>
<td>Commerical/Housing</td>
<td>Site area below threshold for allocation</td>
<td>No</td>
</tr>
<tr>
<td>1012</td>
<td>Tesco Transit Way</td>
<td>Commerical/Housing</td>
<td>Insufficient information provided and parking requirements associated with the retail development,</td>
<td>No</td>
</tr>
<tr>
<td>1013</td>
<td>Money Centre</td>
<td>Mixed use development to deliver new high quality offices, with enabling student accommodation and/or hotel</td>
<td>Site area below threshold for allocation</td>
<td>No</td>
</tr>
<tr>
<td>Site ref</td>
<td>Site</td>
<td>Use under consideration</td>
<td>Summary reason for site not being c/f to Reg 19 plan</td>
<td>Identified as LGS? site (yes / no)</td>
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</tr>
<tr>
<td>1014a</td>
<td>Southway Valley, Dunraven Drive</td>
<td>Housing</td>
<td>Community and natural infrastructure impacts</td>
<td>Yes</td>
</tr>
<tr>
<td>1016</td>
<td>Land at Boringdon Park</td>
<td>Housing</td>
<td>Unsustainable location for development unless connected to proposed neighbouring site at Coypool; unacceptable natural infrastructure impacts, especially on exposed parts of site</td>
<td>No</td>
</tr>
<tr>
<td>1017</td>
<td>Land off Horsham Lane, Tamerton Foliot</td>
<td>Housing</td>
<td>Unsustainable location for development; unacceptable natural infrastructure impacts; adverse impact on conservation area including its setting</td>
<td>No</td>
</tr>
<tr>
<td>1018</td>
<td>Land at Jennycliff</td>
<td>Housing</td>
<td>Unsustainable location for development; unacceptable natural infrastructure impacts</td>
<td>No</td>
</tr>
<tr>
<td>1019</td>
<td>Cheriton Close</td>
<td>Residential</td>
<td>Site area below threshold for allocation</td>
<td>No</td>
</tr>
<tr>
<td>1021</td>
<td>Land north of Coombe Lane</td>
<td>Housing</td>
<td>Unsustainable location for development; unacceptable natural infrastructure impacts; adverse impact on conservation area incl its setting</td>
<td>No</td>
</tr>
<tr>
<td>1022</td>
<td>Quay Point</td>
<td>As in Sutton Harbour AAP and/or Sutton Harbour vision document</td>
<td>Site area below threshold for allocation</td>
<td>No</td>
</tr>
<tr>
<td>1023</td>
<td>Quay Square/Quay Road</td>
<td>As in Sutton Harbour AAP and/or Sutton Harbour vision document</td>
<td>Site area below threshold for allocation</td>
<td>No</td>
</tr>
<tr>
<td>1024</td>
<td>White House Pier</td>
<td>As in Sutton Harbour AAP and/or Sutton Harbour vision document</td>
<td>Site area below threshold for allocation</td>
<td>No</td>
</tr>
<tr>
<td>1025</td>
<td>Vauxhall Quay</td>
<td>As in Sutton Harbour AAP and/or Sutton Harbour vision document</td>
<td>Site area below threshold for allocation</td>
<td>No</td>
</tr>
<tr>
<td>1026</td>
<td>Sutton Wharf</td>
<td>As in Sutton Harbour AAP and/or Sutton Harbour vision document</td>
<td>Site area below threshold for allocation</td>
<td>No</td>
</tr>
<tr>
<td>1027</td>
<td>North Quay</td>
<td>As in Sutton Harbour AAP and/or Sutton Harbour vision document</td>
<td>Site area below threshold for allocation</td>
<td>No</td>
</tr>
<tr>
<td>1028</td>
<td>Brunswick Place</td>
<td>As in Sutton Harbour AAP and/or Sutton Harbour vision document</td>
<td>Part of wider allocation</td>
<td>No</td>
</tr>
<tr>
<td>1029</td>
<td>Horsewash</td>
<td>As in Sutton Harbour AAP and/or Sutton Harbour vision document</td>
<td>Part of wider allocation</td>
<td>No</td>
</tr>
<tr>
<td>1031</td>
<td>China Quay</td>
<td>As in Sutton Harbour AAP and/or Sutton Harbour vision document</td>
<td>Site area below threshold for allocation</td>
<td>No</td>
</tr>
<tr>
<td>1032</td>
<td>Eastern Gateway</td>
<td>As in Sutton Harbour AAP and/or Sutton Harbour vision document</td>
<td>Not a distinct development site; contrary to objective of safeguarding fishing market infrastructure</td>
<td>No</td>
</tr>
<tr>
<td>1033</td>
<td>Land adj to 54 Blunts Lane</td>
<td>Housing</td>
<td>Poor access; unacceptable natural infrastructure impacts</td>
<td>No</td>
</tr>
<tr>
<td>1034</td>
<td>Land at Boringdon Hill</td>
<td>Housing</td>
<td>Unsustainable location for development; unacceptable natural infrastructure impacts</td>
<td>No</td>
</tr>
<tr>
<td>1035</td>
<td>Whiston Farm, Whitson Cross Lane, Tamerton Foliot</td>
<td>Housing</td>
<td>Unsustainable location for development; unacceptable natural infrastructure impacts. Site is extremely steep, and detached from any recognised sustainable settlement.</td>
<td>No</td>
</tr>
<tr>
<td>Site ref</td>
<td>Site</td>
<td>Use under consideration</td>
<td>Summary reason for site not being c/f to Reg 19 plan</td>
<td>Identified as LGS? site (yes / no)</td>
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</tr>
<tr>
<td>1037</td>
<td>Plymstock Clinic</td>
<td>Surgery and housing</td>
<td>Site area below threshold for allocation</td>
<td>No</td>
</tr>
<tr>
<td>1038 / 1059 (SH_07_14_16 PUF)</td>
<td>Land at Dodovens Farm, Brixton</td>
<td>Housing</td>
<td>Unsustainable location for development; unacceptable natural infrastructure impacts; unacceptable impact on delivery of wider growth strategy for Plymouth. Site is detached from the built up area of Elburton at Plymouth, separated by extensive area of strategic green space including Sherford Community Park. Site is also to the south of rejected Site 1059 which abuts the southern boundary of the Community Park. Site 1038 does not adjoin Sherford Urban Extension. Sherford has planning permission as an urban extension and its development is in progress. Relative proximity of Site 1038 to Sherford in this eastern corridor poses significant risk to delivering the new community at Sherford, by diverting demand and by potentially slowing down delivery rates at Sherford. Development of the site, separately or in combination with site 1059, would significantly reduce the gap separating the settlements of Plymouth and Brixton, with potential adverse impact on their identities. Site forms a small valley feature, the head of which rises up to the eastern part of the site which is high-lying and prominent in the landscape and open to distant views from the south, west and north.</td>
<td>No</td>
</tr>
<tr>
<td>1040</td>
<td>Old railway line north of Milne Place, Devonport</td>
<td>Housing</td>
<td>Site not suitable</td>
<td>No</td>
</tr>
<tr>
<td>1042</td>
<td>land adj Tuxton Farm SE of Deep Lane</td>
<td>Housing</td>
<td>No evidence that site is available and achievable, so not considered to be deliverable for the purposes of allocation in the JLP. Site is outside the proposed Plymouth Policy Area; however, it is clearly put forward as a potential solution for the PPA. The land lies to the south east of Deep Lane, to the east and not abutting the eastern-most extent of the Sherford Urban Extension (PLY48). Sherford has planning permission as an urban extension and its development is in progress. Relative proximity of Site 1042 to Sherford in this eastern corridor poses significant risk to delivering the new community at Sherford, by diverting demand and by potentially slowing down delivery rates at Sherford. Site is in the countryside. Site has not been promoted by landowner/developer</td>
<td>No</td>
</tr>
<tr>
<td>1051</td>
<td>Land at Haye Road</td>
<td>Housing</td>
<td>Unsuitable location for housing; greenspace constraints</td>
<td>No</td>
</tr>
<tr>
<td>1052</td>
<td>Chittleburn Business Park, Brixton</td>
<td>Employment</td>
<td>Unsustainable location; not needed to meet employment land needs</td>
<td>No</td>
</tr>
<tr>
<td>1056</td>
<td>Land West of Forder Valley Road</td>
<td>Housing</td>
<td>Unacceptable natural infrastructure impacts</td>
<td>No</td>
</tr>
<tr>
<td>Site ref</td>
<td>Site</td>
<td>Use under consideration</td>
<td>Summary reason for site not being c/f to Reg 19 plan</td>
<td>Identified as LGS? site (yes / no)</td>
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</tr>
<tr>
<td>1057</td>
<td>Drake Memorial Park</td>
<td>Cemetery / burial use</td>
<td>Area of search rather than a specific site for potential cemetery / crematorium</td>
<td>No</td>
</tr>
<tr>
<td>1058</td>
<td>Elliot Road, Cattedown</td>
<td>Not specified</td>
<td>Insufficient information provided as to the type of development being promoted</td>
<td>No</td>
</tr>
<tr>
<td>SH_07_07_08/13</td>
<td>Land between Brixton and Elburton</td>
<td>Housing</td>
<td>Site is detached from the built up area of Elburton at Plymouth, separated by extensive area of strategic green space including Sherford Community Park. Site abuts the southern boundary of Community Park but does not adjoin Sherford Urban Extension. Sherford has planning permission as an urban extension and its development is in progress. Relative proximity of Site Plym ref 1059 to Sherford in this eastern corridor poses significant risk to delivering the new community at Sherford, by diverting demand and by potentially slowing down delivery rates at Sherford. Development of the site, separately or in combination with site Plym ref 1038, would significantly reduce the gap separating the settlements of Plymouth and Brixton, with potential adverse impact on their identities.</td>
<td>No</td>
</tr>
<tr>
<td>Site ref</td>
<td>Site</td>
<td>Reason for rejecting the site for residential</td>
<td>Identified as LGS? site (yes / no)</td>
<td></td>
</tr>
<tr>
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<td></td>
</tr>
<tr>
<td>0150</td>
<td>1 Woodland Terrace, Greenbank Road</td>
<td>Site size below SHELAA threshold (0.25Ha)</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>0216</td>
<td>Hilltop Garage, Austin Crescent</td>
<td>Site size below SHELAA threshold (0.25Ha)</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>0314</td>
<td>Car Park North Hill</td>
<td>Site size below SHELAA threshold (0.25Ha)</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>0837</td>
<td>Weston Mill Civic Amenity Site</td>
<td>Site size below SHELAA threshold (0.25Ha)</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>0841</td>
<td>Exchange Street Car Park</td>
<td>Site size below SHELAA threshold (0.25Ha)</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>0843</td>
<td>Corner of Weston Park Road/Outland Road</td>
<td>Site size below SHELAA threshold (0.25Ha)</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>0849</td>
<td>Land at Amados Hill, Merafield</td>
<td>Too environmentally sensitive - part of Saltram Countryside park</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>0891</td>
<td>Land Off Belliver Way</td>
<td>Current employment site.</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>0892</td>
<td>Stamford Lane, Jennycliffe</td>
<td>Highly constrained site with unacceptable natural infrastructure impacts; part of site in AONB.</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>0893</td>
<td>Sites at Jennycliff (land south of Lalebrick Road)</td>
<td>Highly constrained site with unacceptable natural infrastructure impacts.</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>0894</td>
<td>Sites at Jennycliff (land east of Jennycliff Lane and South of Lalebrick)</td>
<td>Highly constrained site with unacceptable natural infrastructure impacts.</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>0895</td>
<td>Sites at Jennycliff (land east of Jennycliff Lane)</td>
<td>Highly constrained site with unacceptable natural infrastructure impacts. Sports pitch on site.</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>1000</td>
<td>Martin's Gate Car Park</td>
<td>Site size below SHELAA threshold (0.25Ha)</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>SH_04_15_16</td>
<td>Leigh Farm, Roborough</td>
<td>Policy constrained - Strategic green infrastructure asset, ancient woodland</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>SH_04_09_08/13</td>
<td>Land north east of Haxter Lodge, Roborough</td>
<td>Policy constrained - part of the site within AONH has been rejected</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>SH_49_05_08/13</td>
<td>8 Larch Grove, Plympton</td>
<td>Policy constrained - sustainable linked communities, landscape, not well related to services and facilities, mineral consultation zone</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Rep ID</td>
<td>Site ref</td>
<td>Comment Summary (extract from Response report)</td>
<td>Detailed Response (extract from Response report)</td>
<td>Identified as LGS? site (yes / no)</td>
</tr>
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</tr>
<tr>
<td>70</td>
<td>No site ref</td>
<td>Seeks allocation of land between Shackelton Court and Pepys Place Manadon, Plymouth, for housing-led mixed use and community park, with any emphasis on community park - the site does not perform a worthy function in terms of Neighbourhood Green Space</td>
<td>The site is heavily wooded and forms an important greenspace in this neighbourhood. Site not submitted at Reg 18 stage.</td>
<td>No</td>
</tr>
<tr>
<td>469</td>
<td>No site ref</td>
<td>Land to rear of 123-195 Fort Austin Avenue should be allocated for residential and not part of Derriford Community park</td>
<td>Disagree that the land in question is suitable for residential development. It forms part of the green infrastructure of the area and is part of the network that joins the valleys within Derriford Community Park. Site not submitted at Reg 18 stage.</td>
<td>No</td>
</tr>
<tr>
<td>479</td>
<td>No site ref</td>
<td>Seeks the inclusion of the BQW site in PLY58(9) allocation</td>
<td>This site has not previously been made available prior to the Reg 19 consultation and as such the suitability and deliverability of the proposal has not been assessed. However, this would not preclude the promoters of the site pursuing the development through a planning application, either individually or as part of the development of the former gas works site should there be willingness from the adjacent landowner(s).</td>
<td>No</td>
</tr>
<tr>
<td>756</td>
<td>No site ref</td>
<td>Seeks a new policy on the port of Millbay</td>
<td>The JLP already includes policies for safeguarding ports and so this change is considered unnecessary</td>
<td>No</td>
</tr>
<tr>
<td>926</td>
<td>No site ref</td>
<td>Seeks bespoke policy for National Marine Aquarium site</td>
<td>A site specific allocation of this site has not been put forward through the plan making process. The plan is clearly supportive of investment in visitor and tourism infrastructure and therefore also of the National Marine Aquarium. It is unclear why a specific policy is needed for this facility, although the LPAs have no objection to amendments to the narrative of the plan drawing out the facilities significance. This can be picked up in any amendments relating to the Sutton Harbour area as a whole (see responses to representations of Sutton Harbour Holdings)</td>
<td>No</td>
</tr>
<tr>
<td>1007</td>
<td>No site ref</td>
<td>There are a number of bomb sites on Adelaide Street and Arundel Crescent over 0.25ha that should be considered</td>
<td>Specific sites have not been identified and no suitable, available and deliverable proposals have been put forward during the plan making process.</td>
<td>No</td>
</tr>
<tr>
<td>1248</td>
<td>No site ref</td>
<td>Royal Citadel site should have an allocation and not be considered as an opportunity site</td>
<td>At the time of the Reg 19 plan there was insufficient evidence to make the site an allocation, but it is anticipated that it will be picked up in 5 year review of the plan</td>
<td>No</td>
</tr>
<tr>
<td>1514</td>
<td>No site ref</td>
<td>Cattedown Wharf should be allocated and safeguarded as minerals wharf</td>
<td>The site is safeguarded by virtue of Policy PLY5.3. However, for clarity the site could be identified specifically in the supporting text for the policy</td>
<td>No</td>
</tr>
<tr>
<td>1514</td>
<td>No site ref</td>
<td>Pomphlett Wharf should be allocated and safeguarded as minerals wharf</td>
<td>The site is safeguarded by virtue of Policy PLY5.3. However, for clarity the site could be identified specifically in the supporting text for the policy</td>
<td>No</td>
</tr>
<tr>
<td>1514</td>
<td>No site ref</td>
<td>Corporation Wharf should be allocated and safeguarded as minerals wharf</td>
<td>The site is safeguarded by virtue of Policy PLY5.3. However, for clarity the site could be identified specifically in the supporting text for the policy</td>
<td>No</td>
</tr>
<tr>
<td>1514</td>
<td>No site ref</td>
<td>Victoria Wharf should be allocated and safeguarded as minerals wharf</td>
<td>The site is safeguarded by virtue of Policy PLY5.3. However, for clarity the site could be identified specifically in the supporting text for the policy</td>
<td>No</td>
</tr>
<tr>
<td>1636</td>
<td>No site ref</td>
<td>Royal Citadel site should have an allocation and not be considered as an opportunity site</td>
<td>At the time of the Reg 19 plan there was insufficient evidence to make the site an allocation, but it is anticipated that it will be picked up in 5 year review of the plan</td>
<td>No</td>
</tr>
<tr>
<td>Rep ID</td>
<td>Site ref</td>
<td>Comment Summary (extract from Response report)</td>
<td>Detailed Response (extract from Response report)</td>
<td>Identified as LGS? site (yes / no)</td>
</tr>
<tr>
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<tr>
<td>1922</td>
<td>No site ref</td>
<td>Royal Citadel site should have an allocation and not be considered as an opportunity site</td>
<td>At the time of the Reg 19 plan there was insufficient evidence to make the site an allocation, but it is anticipated that it will be picked up in 5 year review of the plan. Given the heritage significance of the site it is considered that any policy must be based on a thorough understanding of the site and buildings which has not be possible to undertake at present.</td>
<td>No</td>
</tr>
<tr>
<td>2106</td>
<td>0271</td>
<td>Seeks allocation of greenspace site for housing (land off Forder Valley road)</td>
<td>Site unsuitable given unacceptable natural infrastructure impacts</td>
<td>No</td>
</tr>
<tr>
<td>2145</td>
<td>No site ref</td>
<td>Within the City Centre there is one area that does not receive any attention at all and that is west from Armada Way to the eastern flank of the City Market building covering the south and north facing elevations of New George Street and Cornwall Street.</td>
<td>Site allocations relate to sites where there is evidence to support their availability, suitability and deliverability. This does not mean that other sites could not come forward for development through the development management process. The City Centre masterplan has guided what sites are allocated within the city centre itself. The city centre policy of the JLP and the masterplan together provide the broader holistic vision which relates to all sites, allocated or not.</td>
<td>No</td>
</tr>
</tbody>
</table>