

1.0 Introduction

- 1.1 My name is Neal Jillings and I am a planning consultant with Foot Anstey Planning in Exeter. I have a Bachelors degree in Rural Estate Management from the University of Plymouth and a Masters degree in Town and Country Planning from the University of the West of England In Bristol. I am a member of the Royal Town Planning Institute.
- 1.2 Prior to joining Foot Anstey Planning in the summer of 2006, I worked for North Somerset Council, the Planning Inspectorate and Scott Wilson. I have sat on the Policy Council of the Town and Country Planning Association and am an elected member of the South West Branch of the RTPI's Regional Affairs Committee.
- 1.3 This statement has been prepared to assist the Inspector in running session F of the North Plymstock Area Action Plan (AAP) examination to be held on 28 March 2007.
- 1.4 The issue to be examined on in session F is "*Whether the AAP should contain more detail on the options for the location, timing and delivery of housing*". This is clearly a broadly defined issue. The original representations focus on one site at Haye Road and are reproduced in Appendix 2. In accordance with the requirement for representations to relate to the 'soundness' of the document, the original representations related to test 7, as set out in Planning Policy Statement 12. This test requires that a development plan document's "*strategies/policies/allocations represent the most appropriate in all the circumstances, having considered the relevant alternatives, and they are founded on a robust and credible evidence base*".
- 1.5 The original representations highlighted two interrelated issues; the greenscape designation under policy CS18 of the Core Strategy and the site's suitability for allocation as a housing site in the AAP. This statement expands upon the limited amount of information originally provided. The landowner's engagement with the Local Development Framework preparation process is part of wider long running and

ongoing negotiations. Given the importance of the LDF, the site is proposed as an allocation in the AAP.

- 1.6 The landowner does not consider that the site should be considered as performing any function relating to the Greenscape designation and should, instead, be allocated for housing. The site is available, deliverable and can contribute towards meeting the housing requirement as set out in Regional Spatial Strategy. Concerns expressed in previous refusals and appeal dismissals no longer apply, primarily because of the nearby Sherford development.

2.0 The site

2.1 The triangular site of approximately 0.5ha is located on Haye Road in North Plymstock. Haye Road joins the A379 in Plymstock to the south and runs north towards Plympton past Saltram House. The site is bounded by Haye Road to the east, No. 35 Haye Road and a former railway embankment to the south and south west and No. 43 Haye Road to the north. The extent of the former garden centre is shown in figure 1 outlined in red. The land outlined in blue, No. 43 Haye Road is also within the same land ownership. The site is located opposite the entrance to King George V playing fields.

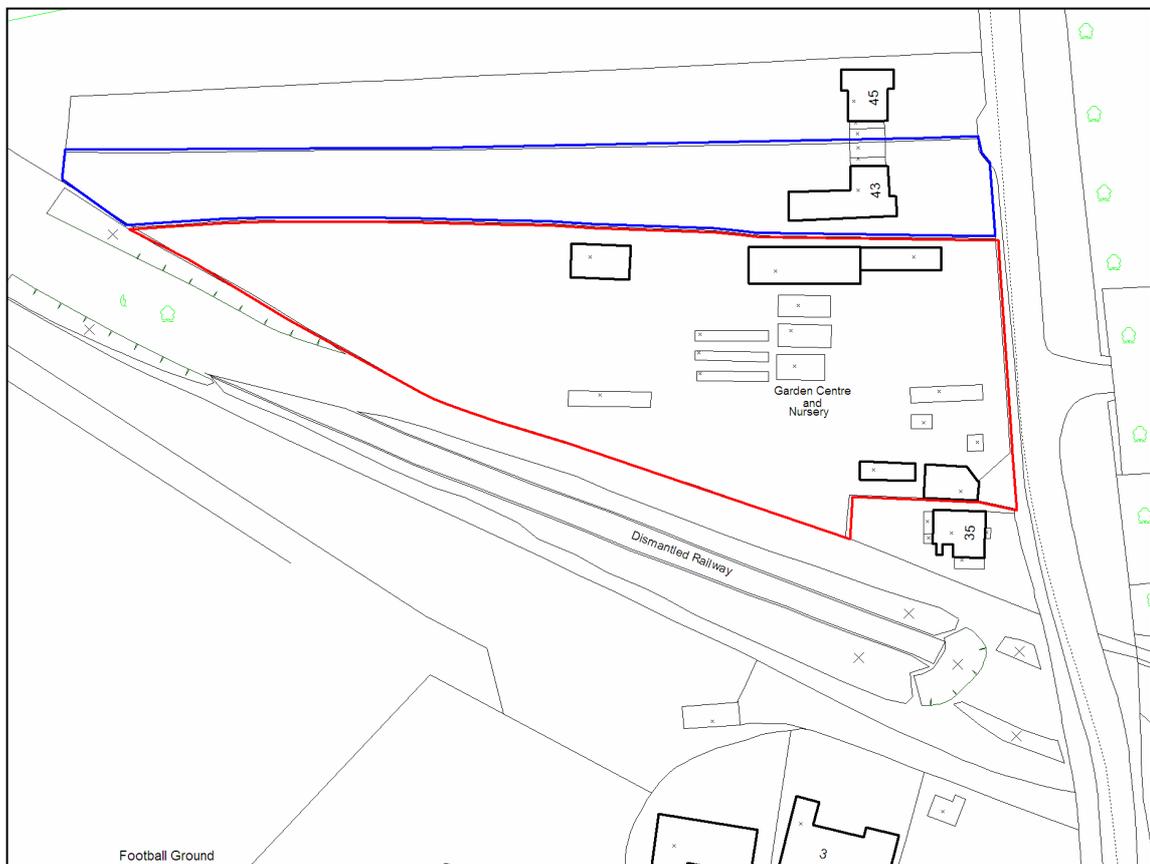


Fig. 1 - Site plan

2.2 Appendix 1 of this statement includes a number of photos taken of the site and its surroundings. This appendix also includes a plan showing the approximate location from where each photograph was taken.

2.3 As can be seen from the photos and from inspection, the site has the appearance of a previously developed site (regardless of how the previous use precisely relates to

the definition found in PPS3). The majority of the site is laid with concrete pathways and derelict structures.

2.4 Whilst the Sherford development does not form part of the site's context at present, it clearly will during the time period covered by the AAP. Of prime importance to the site's suitability for development will be the alignment of the HQPT. The AAP shows the road from Sherford coming across the middle of the playing fields and carrying on through the bungalow adjoining the Garden Centre site. The eventual application for Sherford has realigned the link road to Sherford, which is now routed along the northern edge of the playing fields. Rather than carrying straight over Haye Road in a westerly direction there would appear to be some flexibility over the precise alignment of the HQPT before it joins the disused railway. This will be dependant on negotiations between the two landowners (the quarry operators (Aggregate Industries) and Langage Construction) and the City Council. Regardless of the precise alignment the context in which the site sits will have changed significantly with the eventual construction of the HQPT. It may be the case that the aspiration with regard to construction of the HQPT can be assisted by the release of part of the site as part of a planning application process. The plan shown on page 44 of the submitted AAP shows the site in the context set by the Council's previous understanding of the HQPT route and in relation to the Sherford proposal.

3.0 Issues

- 3.1 It is not considered necessary to repeat endless passages from national, regional and local planning policy. Certain extracts are repeated where it is considered of particular relevance.
- 3.2 As noted in the introduction, there are two issues; the site's designation as Greenspace and the site's availability and suitability as a housing allocation.
- 3.3 The first policy hurdle to overcome is that of the designation as Greenspace under Policy CS18 of the Core Strategy. This policy is a remnant of Policy 69 from the unadopted First Deposit Local Plan published in 2001. The 1996 adopted Local Plan did not designate the site as Greenspace.
- 3.4 The City Council commissioned Land Use Consultants to undertake a Greenspace Assessment in 1999 and again in 2003 to update and review the original study. This update was published in June 2004.
- 3.5 Policy CS18 refers to the Greenspace designation performing functions "*including, biodiversity, visual amenity, sports and recreation*". Policy 69 from the unadopted 2001 Local Plan provides a more comprehensive description of the functions expected of land designated as Greenspace.
- 3.6 Taking each of the functions in turn, it is our contention that the site does not function in any of the roles expected of it. This is expanded on below in relation to the particular roles identified as being relevant to this site in the Greenspace Strategy Update.
- 3.7 Turning to the Greenspace Strategy Update, Appendix 4 contains the survey sheets for individual sites. The site owned by Langage Construction forms part of a larger site identified as E5 – Playing fields and land west of Haye Road. The survey sheet

acknowledges that there is no public access to the site and that the “*survey is based on aerial photography and views from the roadside*”. The survey sheet notes that the western half of the site is deciduous woodland and makes reference to construction work on the far eastern part of the site (adjacent to Haye Road). Part of the western half of the site is deciduous woodland, but not the site within the ownership of Langage Construction. We are uncertain what construction works were being undertaken on part of the site adjacent to Haye Road. If views were gained from the road side, the surveyor would have noticed the former garden centre. This has not been noted in the document.

- 3.8 The survey sheet notes that the site is important in terms of sports/other organised activities, natural habitats/biodiversity, visual amenity and as a separation/buffer. The first function is irrelevant in connection with this site. The final function identified is no longer relevant. A previous appeal decision, attached as Appendix 4, for development of the site clearly saw this function of separating Plymstock and Plympton as extremely important and formed a major part of the reasoning behind dismissing the appeal. As noted above, our contention is that the context has changed significantly with the proposed construction of the High Quality Public Transport (HQPT) route from the new community at Sherford into Plymouth. The AAP shows the HQPT route cutting through the site before joining up with the disused railway line. The inspector saw the line of the railway embankment marking the transition from urban to rural. This was clearly the case at that time, but the routing of the HQPT to the north represents changed circumstances. The Inspector also considered that the site had a greater affinity with the open land to the north. We contend that the character of this area will have changed so much that the route of the HQPT more appropriately marks the transition from urban to rural. This is clearly the implication of proposal NP06. In addition, the routing of the HQPT is such that the site is better related to the urban form to the south than it is to the open area to the north. The Inspector also saw that allowing the appeal could prejudice

the LDF's intentions for the site. We now find ourselves at this stage and put forward the site for consideration.

3.9 Turning to the issue of natural habitats/biodiversity, a judgement was made in the survey, from the roadside looking in, that the site functioned as a resource in terms of biodiversity. A wildlife survey was recently undertaken on the site and this is included in appendix 5. This clearly shows that there is limited biodiversity interest on the site. Evidence of badgers was not found on the site, though evidence was found in the area of woodland to the south of the site. Within the site, piles of rubble indicated a potential for some interest in terms of reptiles. The report suggests that further survey work is undertaken in this regard.

3.10 Turning to visual amenity, the Greenscape Strategy Update refers to the definition found as an annex to PPG17. PPG17 states that "*even without public access, people enjoy having open space near to them to provide an outlook, variety in the urban scene, or as a positive element in the landscape*". Taking the contribution this particular site makes to visual amenity, the site clearly does not provide a positive element to the landscape. It is unkempt, derelict and detracts from any visual amenity that may exist. Any visual amenity inferred from the site forming part of a larger whole of open space will be negated by the routing of the HQPT, effectively cutting it off from the surrounding areas of open space. In allowing the site to remain derelict, a high quality modern public transport route will pass a low quality derelict site with little in the way of visual amenity just as it enters the main built form of the city of Plymouth.

3.11 In conclusion, it is our contention that the site no longer performs any of the functions expected of it as an area of Greenscape. Because of significant change in the immediate vicinity of the site, the site should not, in our view, be seen as making any contribution to the wider Greenscape designation.

3.12 We now turn to the site’s suitability as a housing allocation. The site of the garden centre could, assuming 50 dwelling per hectare as it is on the HQPT route, accommodate 25 dwellings. Dependant on the route of the HQPT to the north of the site, further land may be released. In addition, the southern boundary of any eventual allocation could be moved further to the south to encompass additional land.

3.13 The garden centre site is available for development and should be allocated. The City Council has stated that the site is too small to be allocated. We do not accept this and consider the certainty provided with an allocation will be of benefit to both the City Council and the landowner. If allocated, much needed residential development will be delivered within the plan period. Because of the adjoining working quarry, an environmental noise assessment has been undertaken and may be found in appendix 6. This concluded that the site falls within Noise exposure Category A where noise need not be the determining factor in determining an application. Mitigation measures are, nevertheless, proposed.

3.14 The status of the site in relation to the definition of previously developed land found in PPG3 and PPS3 does not form a major plank of our case, but a letter from the City Council, reproduced in Appendix 3, refers to the site as a “former garden centre”. It may be that a case will have to be made at a later date in this regard, where evidence relating to the level of imported goods sold on the site will have to be presented.

3.15 In terms of housing provision, Policy CS16 in the submitted Core Strategy states that approximately 2,500 new dwellings should be provided by 2021. The proposals in the AAP propose the following dwellings numbers.

Proposal	No. of dwellings
NP01 – Plymstock Quarry	1,500
NP02 – Pomphlett Industrial Estate	75

NP03 – Wakehams Quarry	250-350
NP05 – Sherford	320
NP06 – North of Elburton	300
Total	2,445-2,545

3.16 Proposal NP06 is put forward as a “*potential long term development option*” for development post 2016. The proposal text also wavers on the site’s suitability by stating that another option could be that the site is retained as a green buffer. There is some uncertainty on at least 300 of the dwellings relied on for delivery of the 2,500 required in the North Plymstock area. Taking into account a non implementation allowance further highlights the disparity between this target in the Core Strategy and what the AAP attempts to deliver. Windfalls will be limited in the extreme as the AAP area covers limited urban areas. Whilst the former garden centre site is small, it could provide 25 or more dwellings. If the HQPT is aligned further north than expected, a fact made more likely by the realignment of the HQPT to the north across the playing fields, more land may be available for development, meaning greater numbers of units could be provided.

3.17 As highlighted in the Core Strategy and the Annual Monitoring Report (AMR), the RSS requires a step change in delivery over the plan period. From a level of completions of 738 dwellings during 2005/6, the City Council has forecast a massive leap to 1,215 completions in 2006/7 and 1,394 in 2007/8. We have not undertaken sufficient research to either dispute or accept this figure, but we contend that the City Council will require sites such as the one before the examination to help deliver the increased requirement during the plan period.

3.18 In terms of other policies within the Core Strategy, the site will contribute towards achieving Strategic Objective 10 – Delivering adequate housing supply. The site will also be required to provide an element of affordable housing under Policy CS15 and

will fall under Policy CS16, which highlights priority locations for new dwellings within the city.

- 3.19 In terms of transport policy, the HQPT is clearly a high profile aspiration of the City Council. Various targets relating to transport and communications are set out on page 141 of the submitted Core Strategy. The last two are of relevance to our case. The site is extremely well placed to integrate with the provision of the HQPT, both before the link across to the disused railway line is constructed and after. In addition, the landowner is well placed to assist in delivery of this key link of the HQPT through the planning application process. Along with delivering affordable housing, a key community benefit of facilitating construction of the HQPT across his land can be delivered. Having said this, any realignment of the HQPT from Haye Road towards the disused railway line may not require any of the site under the ownership of Langage Construction Ltd for its construction. As such, a larger allocation to include reference to the requirement for the safeguarding of the HQPT route and dwellings may be considered appropriate.
- 3.20 Policy CS28 states that higher densities “*will be expected to be provided near...the High Quality Public Transport network*”. As such it may be appropriate to exceed 50 dwellings per hectare on this site. The policy text also refers to the need for safeguarding land for the HQPT. Such a policy aspiration may be built into the text relating to what the eventual allocation should be capable of delivering.
- 3.21 Adjoining the HQPT will be improved pedestrian and cycling routes, eventually along the disused railway line. Given the excellent accessibility of the site afforded by these important links, initiatives such as smaller units with no car parking provided, but increased cycle parking, for example, may further increase the number of dwellings on the site. In short, the site can contribute to the delivery of the HQPT and also other accessibility aspirations due to its location next to the HQPT and cycle and pedestrian links.

3.22 As noted above, the landowner has been in long running and ongoing negotiations with Plymouth City Council. We have not included extensive evidence of this, but have included a copy of email correspondence between Foot Anstey and the City council in Appendix 7. This correspondence clearly indicates that the City Council sees the site as being suitable for residential development. The email correspondence included an attachment, also in Appendix 7, indicating a draft layout on the site, prepared by the City Council.

4.0 Conclusion

- 4.1 As has been demonstrated, the site does not perform any of the functions expected under the designation of Greenscape. The site can provide certainty in delivering a number of residential units, both affordable and open market. In addition, it can facilitate delivery of the HQPT and is extremely accessible.

- 4.2 The AAP should acknowledge that the Sherford development and HQPT changes both the site's suitability to be identified as Greenscape and its suitability as a site able to contribute to meeting the housing requirement.