

# **Plymouth City Council**

## **Local Development Framework Devonport Area Action Plan**

### **The Environmental Assessment of Plans and Programmes Regulations 2004**

## **Environmental Statement**

### **Introduction**

Plymouth City Council adopted the Devonport Area Action Plan on 6th August 2007. As part of the adoption procedures under the Environmental Assessment of Plans and Programmes Regulations 2004, Regulation 16 (3) and (4) requires a Statement to be produced on the adoption of any plan or programme to which the regulations apply. This statement explains how environmental considerations have been integrated into the plan or programme; how the environmental report has been taken into account; how public consultation responses have been taken into account; and how the significant environmental effects of implementing the plan or programme will be monitored. Through this statement it will be demonstrated that the plan adopted is the most sustainable, rather than other options considered.

### **Key Environmental Bodies**

Throughout the process of carrying out a Sustainability Appraisal of the Devonport Area Action Plan, three key bodies are required to be consulted – the Environment Agency, English Heritage and Natural England (formerly English Nature and the Countryside Agency). During the Sustainability Appraisal, comments from these bodies in particular have shaped the Appraisal and have been fed into the initial SEA/SA Scoping Report, the assessment of Issues and Options, Preferred Options, and the formulation of the Devonport Area Action Plan up to and including submission.

### **Integrating Environmental Considerations into the Devonport Area Action Plan**

In the course of its preparation, the Devonport Area Action Plan has been subject to a four-stage Sustainability Appraisal. The first three stages were completed independently by Land Use Consultants. The final stage was completed in-house by Plymouth City Council. The appraisal began with a Scoping Report in November 2004 (revised March 2005) following new statutory requirements, including the Planning and Compulsory Purchase Act 2004. Preliminary Sustainability Appraisal was then undertaken of the Devonport Area Action Plan Issues and Options, followed by Appraisal of the Preferred Options in July 2005, and finally the Submission Draft in September

2006. At all times the Sustainability Appraisal was carried out in accordance with the requirements of Strategic Environmental Assessment and Appraisal set out in European and UK legislation.

## **Taking the Environmental Report into Account**

### *Issues and Options*

At the Issues and Options stage, many options were considered in addressing the future spatial planning of Devonport. The key Issues and options were outlined in the consultation documents, and these were subject to Sustainability Appraisal. The Sustainability Appraisal concluded that the options were appropriate alternatives in the context of Devonport. The Sustainability Appraisal also confirmed that none of the other alternatives offered significant benefits over the Preferred Options.

### *Preferred Options*

Comprehensive consideration by the Council of the Issues and Options, including responses from stakeholders and the wider community consultation, led to the formulation and publication of Preferred Options. The Sustainability Appraisal concluded that the Devonport Area Action Plan generally strives to meet the range of sustainability objectives. Some tensions remained, however these concerns could be overcome. Adjustments to the Plan in light of comments made in the Preferred Options Appraisal are included in the Submission Draft Appraisal.

### *Submission Draft*

The Sustainability Appraisal of the Submission Draft summed up the comments that have been made throughout the SEA/SA process on the sustainability and potential social, environmental and economic impacts that could result from the strategies, plans, objectives, policies, targets and proposals contained in the Submission Draft of the Devonport Area Action Plan. The Appraisal concluded that substantial revisions had been made to the Devonport AAP Submission Version (September 2006) including a number of improvements designed specifically to mitigate potential adverse effects noted by the SEA/SA of the Preferred Options AAP and the SEA/SA of the Core Strategy Submission Version. The results of the SEA/SA indicate that the AAP has largely addressed the recommendations of the previous SEA/SA and therefore broadly conforms to the Sustainability Objectives.

## **Devonport Area Action Plan Public Examination**

The Council's Sustainability Appraisal was subject to Soundness Test 3 by a Planning Inspector who undertook a public examination of the Devonport Area Action Plan including the Sustainability Appraisal. The Inspector concluded that each stage of the Plan had been subject to a Sustainability Appraisal, and the submitted Plan had been subject to a satisfactory Strategic Environmental Assessment. The Inspector also noted that the Council had completed a

Habitats Regulations Assessment to determine whether policies and proposals in the Devonport Area Action Plan will have significant adverse impacts on nearby Natura 2000 sites. It concluded that some policies and proposals would have an adverse effect unless mitigation measures were included. The Inspector was satisfied that the policies and proposals, subject to minor changes detailed in the Inspector's Report, would allow for mitigation of any significant adverse impacts, and that no further changes are needed to make the Devonport Area Action Plan sound in this regard. The Inspector therefore concluded that the Plan and its policies had been properly subjected to Sustainability Appraisal and Soundness Test 3 on Sustainability Appraisal had been met.

## **Public Consultation**

The consultations for the plan itself and the Sustainability Appraisal were conducted in parallel. The process completed was as follows. The Devonport Area Action Plan has been prepared in accordance with the Town and Country Planning (Local Development) (England) Regulations 2004, which require that a Development Plan Document is accompanied by a Statement of Community Involvement (SCI). Plymouth's SCI was adopted in July 2006 and the Devonport Area Action Plan meets all of its requirements. The Plan has been through two major stages of consultation – Issues and Options in March/April 2005, and Preferred Options in July 2005. A full statement of the Council's pre-submission consultation on the Devonport Area Action Plan (Regulation 28 Statement) is available from the Council. Consultation took a variety of forms including: an LDF launch event in February 2004; public reports and associated questionnaires; public exhibitions; presentations to Area Committee meetings; a DVD 'An Invitation to Aspire'; advertisements in the 'Evening Herald' local newspaper; consultation events; focus groups; articles in community newsletters. Documents were available in paper form at the main Council offices, local libraries and Council housing offices. They were also available on the Council website.

The Council has considered all the representations received. The Preferred Options and Submission stage representations were summarised individually and responded to in Schedules of Representations.

## **Monitoring**

The Local Development Framework for Plymouth is to be kept under continuous review. In order for this to happen, an Annual Monitoring Report is required to be submitted to Government Office. The Annual Monitoring Report makes provision for monitoring the sustainability of the Devonport Area Action Plan as it is implemented during the period of the Local Development Framework up to 2021. In addition to an extensive monitoring framework included in the AAP itself, the Sustainability Appraisal includes a framework for monitoring a number of key effects of the Local Development Framework. These include development in flood risk areas, and over-pricing of property in district centres and desirable locations like the waterside which could price out

existing local residents (see Section 3 of the Submission Draft SEA/SA Report).

### **Links to Devonport Area Action Plan Documents** (as at 09/08/07)

Issues and Options:

[http://www.plymouth.gov.uk/i\\_o\\_08\\_devonport\\_vr\\_ammended\\_web.pdf](http://www.plymouth.gov.uk/i_o_08_devonport_vr_ammended_web.pdf)

Sustainability Appraisal of Issues and Options:

[http://www.plymouth.gov.uk/sa\\_i\\_o\\_08\\_devonport\\_aap.pdf](http://www.plymouth.gov.uk/sa_i_o_08_devonport_aap.pdf)

Issues and Options consultation responses:

[http://www.plymouth.gov.uk/08\\_responses\\_to\\_devonport\\_area\\_action\\_plan.pdf](http://www.plymouth.gov.uk/08_responses_to_devonport_area_action_plan.pdf)

Preferred Options:

[http://www.plymouth.gov.uk/po\\_devonport\\_web\\_version.pdf](http://www.plymouth.gov.uk/po_devonport_web_version.pdf)

Sustainability Appraisal of Preferred Options:

[http://www.plymouth.gov.uk/devonport\\_preferred\\_options\\_sea\\_report\\_read\\_only.pdf](http://www.plymouth.gov.uk/devonport_preferred_options_sea_report_read_only.pdf)

Preferred Options Consultation Response Schedule:

[http://www.plymouth.gov.uk/dv01\\_po\\_response\\_schedule.pdf](http://www.plymouth.gov.uk/dv01_po_response_schedule.pdf)

Submitted:

[http://www.plymouth.gov.uk/devonport\\_aap\\_-2.pdf](http://www.plymouth.gov.uk/devonport_aap_-2.pdf)

Submission Response Schedule: Please contact the Council.

Sustainability Appraisal of Submission Draft:

[http://www.plymouth.gov.uk/sustainability\\_assessment\\_for\\_the\\_devonport\\_area\\_action\\_plan.pdf](http://www.plymouth.gov.uk/sustainability_assessment_for_the_devonport_area_action_plan.pdf)

Regulation 28 Statement: Please contact the Council.

Scoping Report:

[http://www.plymouth.gov.uk/sea-sa\\_scoping\\_report\\_read\\_only.pdf](http://www.plymouth.gov.uk/sea-sa_scoping_report_read_only.pdf)