

# **Plymouth City Council**

## **Local Development Framework Central Park Area Action Plan 2006-2021**

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

## **Environmental Statement**

### **Introduction**

Plymouth City Council adopted the Central Park Area Action Plan on 22<sup>nd</sup> September 2008. 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 the Strategic Environmental Assessment / Sustainability Appraisal (SEA/SA) of the central Park Area Action Plan Document, 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 SEA/SA, 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 Central Park Area Action Plan up to and including submission.

### **Integrating Environmental Considerations into the Central Park Area Action Plan**

In the course of its preparation, the Central Park Area Action Plan has been subject to a four-stage SEA/SA. Land Use Consultants completed the first three stages independently and Plymouth City Council completed the final stage in-house. 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 SEA/SA was then undertaken of the Central Park Area Action Plan Issues and Options, followed by Appraisal of the Preferred Options in November and December of 2006, and finally the Submission Draft in January 2008. At all times the SEA/SA was carried out in accordance with the requirements of Strategic

Environmental Assessment and Appraisal set out in European and UK legislation.

### **Sustainability Appraisal Process**

Planning Authorities are required to produce a Sustainability Appraisal (SA), alongside plans that form part of a Local Development Framework (LDF). The Central Park Area Action Plan (AAP) is such a plan.

Sustainability Appraisal uses a range of sustainability objectives and indicators to test whether the plans, policies and proposals are the best possible ones for delivering sustainable development. SA can be viewed as a yardstick against which the social, environmental and economic effects of the plan can be tested.

There were 3 key stages to the preparation of the Central Park AAP, and these comply with Government guidance contained within Planning Policy Statement 12:

Issues and Options (published March 2005)

Preferred Options (published November 2006)

Submission (due to be published January 2008)

Each of these stages has been subject to a Sustainability Appraisal. All of these appraisals have been undertaken using an appraisal framework developed and set out in the SEA/SA Context and Baseline report, which was developed during 2005 and published in July of that year. The appraisals were undertaken prior to publication at each stage, to enable any recommendations to be incorporated in the published versions. This non-technical Summary outlines the key sustainability findings associated with each of these stages and demonstrates how the Appraisal contributed to the development of the plan.

### **Central Park - The Context**

Central Park is a strategically important park within Plymouth and is an outstanding and enviable environmental asset. It covers 94 hectares (232 acres) of dramatic landscape from high hilltop to deep valley offering rare panoramic views of the city and Plymouth Sound.

As the name suggests, Central Park sits centrally within Plymouth and is surrounded by many residential neighbourhoods, these include Beacon Park and Pennycross, Peverell, Mutley and Stoke. For many local residents the park is on their doorstep and it has a particular importance in their lives. The park also has a citywide profile as the venue for the city's sporting activities. It is home to Plymouth Argyle Football Club and is a host for the many amateur competitions held on the outdoor sports pitches and facilities. It is also a place for informal recreation and children's play and is a landscape rich in wildlife.

The park has six distinct elements:

Centrally and to the west lies the built core of the park incorporating the city's football club, (Plymouth Argyle), a large swimming pool (Central Park Pools),

recreation centre (the Mayflower Centre), an events field, Milehouse Park and Ride car park, a skatepark and a large equipped children's playground. Centrally and to the south is a large open hill top sports park. To the north, the formal gardens and parkland associated with Pounds House To the east is a deeply wooded valley Centrally to the east is a patchwork of informal sloping meadows To the south and west is an extensive series of allotment gardens.

### **Objectives of the Area Action Plan**

The vision for the Central Park AAP is:

***To create an outstanding venue of regional and national significance for active recreation, health, art, education, culture and the environment, which will provide state of the art facilities for the people of Plymouth and the sub-region of Devon and Cornwall.***

Central Park will continue to be a unique environmental asset for the city and will be a destination that has successfully enhanced its landscape and wildlife qualities to create a quality and distinctive parkland for the people of Plymouth and their future generations to enjoy.

The proposals to deliver this vision are based on the following objectives:

**Objective 1.** To create a landmark regional Life Centre complex of high quality design and innovative technology.

**Objective 2.** To create a park with desirable, high quality, vibrant spaces that can be used by the whole Plymouth community whilst also safeguarding its value as an important wildlife corridor.

**Objective 3.** To create a safe and well-connected park with its surrounding neighbourhoods and the City Centre.

**Objective 4.** To provide high quality public and sustainable transport facilities serving the park and new facilities.

**Objective 5.** To improve and strengthen the relationship between the park and surrounding city in a sustainable manner.

**Objective 6.** To improve the range and quality of public facilities available to park users.

The plan contains proposals that provide for the following quantum of development:

**Housing** - in the region of 123 units

**Lifetime Homes** - in the region of 27 units

**Employment** - in the region of 5,380 sq m.

**Retail** - in the region of 700 sq m.

### **Summary of Sustainability Appraisal at Issues and Options**

A preliminary SA was undertaken for the Issues and Options document. This concluded that the proposals appeared broadly sustainable, although inevitably some conflict of interest may arise.

The Issues and Options paper '*suggests a move away from the incremental planning of fragmented spaces and uses towards a bold and exciting vision of "Destination Central Park" that re-interprets the historic Mawson Plan for the Park in a contemporary way*'. The SEA/SA appraisal strongly supports the suggestion of an integrated approach to design but notes that there could be significant tensions between the concept of a regional centre of sporting and leisure excellence and the Park's role as a much needed local resource.

**Concerns are raised, in particular, by:**

The potential for substantial growth in car borne visitors and increased demand for parking (contrary to aims for the promotion of public transport) arising from the Life Centre concept with its plans for a stadium, swimming pool, ice rink, multi-sports hall and hotel/conference/exhibition facilities  
Uncertainty over the level of support likely to be forthcoming for the development of really effective public transport links from the rest of the city  
Issues of public safety arising from increased levels of use (although the corollary also applies in that increased levels of activity can sometimes reduce crime levels)

Prospects for securing the required level of investment in the basic infrastructure improvements to the park, as listed under the options, since large scale projects like the Life Centre often absorb most of the available funds, leaving essential repairs and maintenance unattended

The proposals to safeguard and enhance allotments are strongly in line with the overall commitment to sustainable development and should be given high priority. However, this should not be seen as compensation for 'any losses resulting from other park enhancement measures' but as a legitimate goal in its own right

The concepts outlined in this leaflet are at too general a level to allow a full appraisal to take place and it is strongly recommended that the sketch design for the new vision of the park should be completed and published before the detailed consultation planned in September/October 2005.

**Summary of Sustainability Appraisal at Preferred Options**

The results of the SA indicated that whilst the AAP was generally positive there were some general issues and recommendations. These were as follows:

Like other Area Action Plans, Central Park will be reliant on future investment. Care needs to be taken to ensure adequate facilities and services are available to meet the needs of an increasing number of households, and that retail units, appropriate employment provision and a mix of housing tenures are always considered

When considering reducing car parking, the proposal is reliant on encouraging people to make a modal shift. Development proposals are reliant on the success of the new (or improved) public transport system and services must be frequent enough and widely available to encourage a modal shift. This may not occur, at least immediately, and if not measures need to be in place to respond to rising levels of traffic and congestion. It is imperative in encouraging a modal switch that car-parking provision is minimised but also that dual use is explored, with some provision made for residents

Potential negative issues, which are highlighted, relate to the impact of the options wildlife and nature, hence biodiversity, with potential adverse effects on the sites role as a wildlife corridor. It is important to ensure that with an increase in population and visitor numbers, impacts are investigated and minimised or mitigated

Development proposals that will result in a significant increase in impermeable surface area need to take account of any potential increase in flood risk either on site, or on surrounding sites

The structure of existing communities and potential changes need to be carefully considered.

The proposals raise a number of basic questions:

- Will new residential development result in migration?
- Will targets for affordable housing be achieved?
- Will people living in the new development areas actually work there, or will there be
- working elsewhere in the City?

It is not clear whether design of houses and construction of buildings seek to reduce energy consumption, water consumption, and also source materials locally and use where possible secondary materials

An increasing number of households, and increased levels of activity and provision of catering on and around the Park site, will inevitable result in an increase in waste production.

This will need to be considered in plans and addressed

The Preferred Options for Central Park appear to be in line with the sustainability criteria and consideration of the minor points above would ensure proposals are further still in line with sustainability objectives.

### **Summary of Sustainability Appraisal at Submission**

There were a number of changes to the Central Park AAP between the publication of the Preferred Options document and the Submission Version. The report found that these changes do not significantly alter the sustainability of the plan as a whole, and where there are alterations, these generate positive outcomes against the sustainability objectives. The main focus of the sustainability appraisal commentary was on the maximisation of beneficial effects arising from the proposals.

The report made a number of key recommendations in relation to how the plan should respond to the following areas:

**The need for local exemplars in sustainable construction** - The prominence of the Life Centre & Home Park proposals in the physical, social & cultural infrastructure of the City means that it is a prime opportunity to create a local exemplar not only for sustainable lifestyles, but also sustainable construction. There is a sub regional shortage of examples successful of renewable energy and sustainable construction, and this can act as a barrier to encouraging uptake on other sites in the locality. The SA therefore recommends that these elements of the proposal are reinforced through specific reference to sustainable construction benchmarks such as BREEAM Excellent. Using these bench marks within the proposal would address the current uncertainty as to how the Life Centre will respond to the sustainability

objectives for waste and pollution, and will improve its performance in relation to objectives for climate change, energy and resources. The Council's Adopted LDF Core Strategy and draft Design SPD provide some security that these issues will now be addressed as part of all major applications, but the need for local and iconic exemplars of how high standards of sustainable construction can be delivered justifies specific inclusion on these proposals.

**Local economic benefit** - The AAP sets out a framework for significant investment and regeneration of leisure facilities around the Life Centre and Home Park. This report recommends the inclusion of measures such as Local Employment Agreements to ensure that this inward investment addresses local employment needs and has the maximum potential effect on local economic multipliers.

**Comprehensive measures to encourage a modal shift** - The inclusion of new public transport infrastructure is recognised as positive in relation to the sustainability objectives for pollution, climate change and transport, but the report recommends that proposal include demand management measures to ensure that the required modal shift is delivered.

**Biodiversity enhancement** - To ensure that proposals for managing the parkland respond to local /regional /national Biodiversity Action Plan targets the plan could be improved for the quantity and quality of habitats to be restored as part of the management of the wider parkland, i.e. recreate 4 ha of Flower Rich Meadow, restore 500m of Species Rich Hedgerow.

To reflect Central Park as a beacon of local sustainability, and to reflect the Greenfield setting the report encourages the inclusion of requirements for green or brown roofs on the parks proposed facilities.

## Conclusions

Over the course of the preparation of the Central Park AAP, the Sustainability Appraisal process has helped to identify:

- Any potential negative impacts of development in Central Park
- The value of considering renewable energy options, such as Combined Heat & Power, as an integrated part of the Life Centre and Home Park developments
- Biodiversity issues that need to be appropriately integrated, for example through reference to Biodiversity Action Plan targets for delivery of habitat enhancements.
- The need for Central Park / Life Centre to act as a local exemplar of sustainable development
- The need for a more rounded consideration of the measures required to generate the modal shift required to deliver sustainable transport objectives.
- The need for measures within proposals that will help ensure that the inward investment has the maximum potential effect on local economic multipliers.

### **Central Park Area Action Plan Public Examination**

This was held on Wednesday 4<sup>th</sup> and Thursday 5<sup>th</sup> June 2008 and the Inspectors report published on 4<sup>th</sup> July 2008 within which the Inspector accepted in full the Councils Policies and Proposals contained within the Area Action Plan requiring no changes other than those proposed by the Council itself to improve the clarity of the plan and to correct grammatical errors. The Inspector was satisfied that the SEA/SA and the assessment undertaken under the Habitats Directive were sufficient to comply with the relevant tests of soundness.

### **Public Consultation**

The consultations for the plan itself and the SEA/SA were conducted in parallel. The process completed was as follows. The Central Park 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 The Central Park 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 November and December 2006. A full statement of the Council's pre-submission consultation on the The Central Park Area Action Plan (Regulation 28 Statement) is available from the Council.

The Council has considered all the representations received. The Preferred Options and Submission stage representations were summarised individually and responses are included within the Schedules of Representations. None of them related substantially to the SEA/SA process.

### **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 Central Park 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 Development Plan Document itself, the SEA/SA includes a framework for monitoring a number of key effects of the Local Development Framework.