

Central Park AAP - Sustainability Appraisal -  
Submission Stage

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## 1 Introduction

- 1.1** 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.
- 1.2** 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. Sustainability Appraisal is a tool that is used to ensure the full range of environmental, social and economic effects of the LDF are considered during a plans formulation. It seeks to ask the following questions about these effects:
- Could these effects be of special significance?
  - Are there ways of reducing or mitigating adverse effects?
  - Can any beneficial effects be further enhanced by positive planning?
- 1.3** The SA plays an important role in improving the quality of the councils LDF by ensuring that it seeks to deliver national & local objectives for sustainable development.
- 1.4** There have been 3 key stages in the preparation of the Central Park AAP:
- Issues and Options (published March 2005)
  - Preferred Options (published November 2006)
  - Submission ( in preparation October 2007)
- 1.5** 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 published in July (2005). The appraisals were undertaken prior to publication at each stage, to enable any recommendations to be incorporated in the published versions. This report outlines the findings of the appraisal of the Submission version of Plymouth City Council's Central Park Area Action Plan
- 1.6** Sustainability Appraisal is a mandatory requirement of the Planning & Compulsory Purchase Act 2004 for the production of all DPD's & SPD's. This SA will also fulfil the requirement for the AAP to assessed in line with the Strategic Environmental Assessment (SEA) Directive (2001/42/EC).

### Previous Appraisals and Assessments

- 1.7** The ideas expressed within the Central Park AAP have been subject to Sustainability Appraisal at two previous stages. The results of these appraisals are summarised below to provide contextual background for the appraisal of the Submission version of the plan.

- 1.8 The conclusions reached in reviewing the initial Issues and Options for Central Park in March 2005 are set out below:

### **SEA/SA Comments on the Issues & Options Report for Central Park**

The proposals for the Central Park Area Action Plan appear 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 infrastructural 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.

- 1.9 The conclusions reached in reviewing the Preferred Options Report for the Central Park AAP in October 2006 are set below:

**SEA/SA comments on the Preferred Options Report for the Central Park Area Action Plan:**

The results of the SA indicate that whilst the AAP is generally positive there are a number of general issues which need to be addressed (specific issues are covered in the preceding paragraphs).

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.

## 1 Introduction

The preferred option 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 inline with sustainability objectives.

## 2 Appraisal of the Central Park Area Action Plan

### Methodology

- 2.1** This report documents the appraisal of the submission version of the Central Park AAP, focusing on the changes that have occurred since publication of the Preferred Options document.
- 2.2** The appraisal process has run concurrently with plan making, and Plymouth City Council have carefully considered the observations and recommendations of the Sustainability Appraisal team in revising successive drafts of the AAP. This appraisal was conducted in October / November 2007 to allow the suggested refinements to the plan to be included prior to submission in January 2008.
- 2.3** Following the completion of this report it is likely that the format layout and presentation of the plan will change. To avoid future confusion between the SA and the final submission document this report is presented in relation to the broad subject matter of the different proposals and avoids specific reference to detailed proposal numbers.
- 2.4** A summary of the assessment has been provided, in the matrices set out as Table 1. This is followed by a more detailed discussion of the sustainability issues arising from each proposal.
- 2.5** The previous SA's for the Central Park AAP have been completed by Land Use Consultants. This reappraisal has been completed in-house by Plymouth City Council Planning and Regeneration officers. The approach adopted at this stage of the SA has been to:
- Review the previous findings of the SEA/SA relating to the Preferred Options (October, 2006), and consider whether the recommendations have been incorporated into the submission version
  - Examine the changes made since Preferred Options in the preparation of the submission version Central Park AAP, and assess the nature of their likely environmental, social and economic impacts
  - Review the appraisal in the light of new evidence base documents
  - Review the appraisal in the light of relevant changes to wider policy framework relating to sustainable development
  - Make recommendations on actions that may be appropriate to achieve further improvements in sustainability.

### Key Changes Since Preferred Options

- 2.6** The key changes to the Central Park AAP since the publication of the Preferred Options are:
- **The Life Centre.** The development zone for the Life Centre has been tightened.
  - **An improved parkland.** The submission document provides additional detail on proposals for a new social centre for the park, an events field, and improvements to the management of the park's landscape and biodiversity.

- **A well connected park.** The option of a bridge link between the city centre and the southern end of the park is not being taken forward as a specific proposal but the concept remains supported. The footpath link to Peverell Park Road has also been changed to the alternative option suggested in the Preferred Options document in response to concerns about loss of allotments.
- **A Transport Interchange.** This option has been altered to include the retention of the Milehouse Park & Ride.
- **The City Bus Site and Milehouse Road Junction.** This option is not being taken forward as transport modelling has suggested that reconfiguration of the road layout would be unworkable.
- **Pennycomequick.** Significant reduction in the scale of housing development proposed in this area. The former allotment site is to be retained as parkland and managed for wildlife conservation.

2.7 The key changes in the AAP's evidence base which influence this SEA/SA include:

- Extended Phase 1 Habitat Survey of Central Park (June 2007)
- Valuation Report Central Park - Site Option 7 Pennycomequick (September 2007)
- Valuation Report Central Park Site Option 6 Peverell Park Road/Outland Road
- Sport England Active People Survey (December 2006)
- Habitat Regulations Assessment of Plymouths LDF Core Strategy (January 2007).

2.8 The key changes in the wider policy framework that have a significant influence on this SA are:

- Plymouth's Adopted LDF Core Strategy (April 2007)
- Supplement to PPS1: Planning & Climate Change (Dec 2006)
- PPS25 Development & Flood Risk (Dec 2006)
- Code for Sustainable Homes: A step-change in sustainable building practice (December 2006)
- The Energy White Paper ( May 2007)
- Building a Greener Future: policy statement (July 2007)
- Plymouths draft Design Supplementary Planning Document - Sustainable Design In Plymouth (October 2007).

2.9 This SA report will not cover the appraisal of the AAP objectives as these have not altered since Preferred Options.

## Appraisal of each Policy or Proposal - The Sustainability Appraisal Matrix

**2.10** Table 1 overleaf presents a summary of the appraisal of each proposal and compares it against the appraisal results for the equivalent preferred option. The following section of the document discusses in detail the revised appraisal results for each proposal. Sustainability scores used in Table 1 are based on the following ranking:

Key			
✓ ✓	Strongly sustainable	0	No impact
✓	Weakly sustainable	?	Uncertain
✘	Unsustainable		Improvement from preferred option
✘ ✘	Strongly unsustainable		Less sustainable than preferred option

## 2 Appraisal of the Central Park Area Action Plan

SA Criteria (in columns across)	Sustainability Objectives																
	Biodiversity	Pollution	Climate Change	Resources	Energy	Waste	Economy	Work and Incomes	Local Needs	Health and wellbeing	Learning	Safety	Distinctiveness and Cultural Heritage	Leisure	Transport and Access	Basic Needs and Equality	Democracy
Preferred Option 1: The Life Centre	✗ ?	?	✗ ?	?	?	?	✓	✓	✓	✓	✓	✓	✓?	✓	✓	✓	0
Proposal: The Life Centre	0	?	✓	✓	✓	?	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	0
Proposal: Plymouth Argyle's Home Park Development	0	?	✓	✓	✓	?	✓	✓	0	✓	0	✓	✓	✓	✓	0	0
Preferred Option 4: A Transport Interchange	✗ ?	✓	?	✓	✓	✗ ?	✓	✓	✓	✓	0	✓?	✓?	✓	✓	✓?	0
Proposal: A Transport Interchange	0	✓	✓	✓	✓	✗ ?	✓	✓	✓	✓	0	✓	✓	✓	✓	✓?	0
Preferred Option 2: An improved parkland	✓	✓	✓	0	✓	0	✓	0	✓ ?	✓	0	✓	✓?	✓	✓	0	0
Proposal: A New Social Centre	0	0	✓	✓	0	0	0	0	0	0	0	✓	✓	0	✓	✓	0
Proposal: An Events Field	0	0	0	0	0	0	0	0	0	0	0	✓	✓	✓	✓	0	0
Proposal: Improvements to the Natural Environment	✓	0	✓	0	0	0	0	0	0	✓	✓	0	✓	✓	0	0	0
Preferred Option 3: A well connected park	? ✗	✓	✓	0	✓	0	✓	0	✓	✓	0	✓	✓?	✓	✓	✓?	0
Proposal: New and Existing Routes	0	✓	✓	0	✓	0	✓	0	✓	✓	0	✓	✓?	✓	✓	✓?	0
Policy: A Link Between Park and City	0	?	✓	0	✓	0	0	0	0	✓	0	0	✓	✓	✓	✓	0

SA Criteria (in columns across)	Sustainability Objectives																
	Biodiversity	Pollution	Climate Change	Resources	Energy	Waste	Economy	Work and Incomes	Local Needs	Health and wellbeing	Learning	Safety	Distinctiveness and Cultural Heritage	Leisure	Transport and Access	Basic Needs and Equality	Democracy
Preferred Options and Submission (below)																	
Preferred Option 8: A park with improved facilities	?	0	✓	✓	? ✓	?	? ✓	0	✓	✓ ✓	✓	? ✓	✓	✓ ✓	✓	? ✓	0
Proposal: A Park with Improved Facilities	?	0	0	✓	? ✓	?	? ✓	0	✓	✓ ✓	✓	?	✓	✓ ✓	✓	? ✓	0
Preferred Option 6: Peverell Park Road, Outland Road Corner	?	?	?	?	?	?	✓	✓	✓ ?	✓	✓	✓ ?	✓ ?	?	✓ ?	?	0
Proposal: Peverell Park Road, Outland Road Corner	?	?	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	?	0
Preferred Option 7: Pennycomequick	✗ ?	?	?	✓	?	?	✓	✓	✓ ?	✓	?	✓ ?	✓	?	✓ ?	?	0
Proposal: Pennycomequick	0	?	✓	✓	✓	✓	✓	✓	✓ ?	✓	?	✓ ✓	✓	?	✓	✓	0

Table 1 Sustainability Appraisal Matrix for Central Park AAP Submission Draft

## Appraisal of each Policy or Proposal - Analysis of Key Findings

### Overarching Issues

- 2.11** The appraisal matrix clearly highlights that in broad terms the submission version of the AAP delivers positive outcomes against the majority of the SA objectives, and that work since preferred options has improved the sustainability of the plan. This is particularly apparent where the proposals for the Life Centre, the transport interchange, Peverell Park Road / Outland Rd Corner and Pennycomequick are compared against the way these developments were expressed at preferred options.
- 2.12** Proposals such as the new Social Centre, the Events Field, and Improvements to the Natural Environment (those based around An Improved Parkland) are a subdivision of a single preferred option and it is not possible to make a direct comparison of the potential impacts or effects. In these cases the visual impression from the colours on the matrix undersells their contribution to the sustainability of the plan. These proposals provide a positive framework for future investment in the city's premier park that will help to secure significant improvements in the areas biodiversity, its landscape amenity, and its recreational value, which in turn will support efforts to improve health & well being, safety and the delivery of basic needs.

### Concerns raised at Preferred Options

- 2.13** Issues regarding flood risk as a result of development increasing the impermeable surface area are now covered by the adopted Core Strategy (Policy CS21) and concerns re the delivery of appropriate levels of Affordable Housing should be addressed through Core Strategy Policy CS15 and the upcoming Planning Obligations and Affordable Housing SPD.
- 2.14** Measures to reduce energy and water consumption through building design, and the sourcing local materials etc are now covered by the adopted Core Strategy (Policy CS20) and supported by the section on Climate Change within the consultation draft of the Design Supplementary Planning Document (SPD). Waste management is also covered by the adopted Core Strategy (Policy CS26), and the Design SPD. The wider policy framework covering these issues is therefore significantly more robust than when the SA of the Preferred Options was undertaken.

## The Life Centre

### Changes from the Preferred Options

- 2.15** The physical footprint of the Life Centre has been tightened since the Preferred Options, and the proposal now includes an Environment Centre which will have retailing of horticultural and garden products, as well as interpretation of the biodiversity and landscape features of the park. There is also now a requirement for sustainable and energy efficient solutions including Combined Heat and Power shared with the Home Park development. The proposal also now performs well against the resources criteria, with specific mention of efficient use of water and grey water recycling technologies.

### Revised SEA/SA Assessment

- 2.16** The proposal performs significantly better against the sustainability objectives than the Preferred Option. Key positive changes and/ or additions are :
- The recognition that a Combined Heat and Power system needs to be considered as part of an integrated solution with adjoining development site is very positive addition in respect to SA objectives for climate change, energy & resource use
  - The specific reference to facilities to house an environment centre and health education clinics are positive responses to the SA objectives for learning health
  - The reduction in footprint is positive in terms of resource use and limiting impact on the existing parkland.
- 2.17** There is still uncertainty within the proposal about how far such a prestigious new facility for the city will go towards supporting local economic growth. It will clearly provide support for the leisure sector but the comprehensive redevelopment of such a key facility for the city's infrastructure needs to ensure it also take full advantage of potential for local economic multipliers and local employment needs.
- 2.18** The proposal would also benefit from recognising that there is a desperate shortage of Plymouth based examples in terms of renewable energy and sustainable construction, and this can act as a barrier to encouraging uptake on other sites in the locality. If Plymouth City Council are to promote the uptake of higher standards in the private sector, the Life Centre needs to provide a local exemplar of what can be done to deliver on this agenda. In this respect it would be beneficial if the proposal was more explicit in relation to specific sustainable construction benchmarks, and about the need to seek innovative integration of biodiversity into the built form (for example the use of green/brown roofs). Using these benchmarks within the proposal would address the current uncertainty as to how the Life Centre will respond to the sustainability objectives for waste and pollution. These issues should now be considered as part of all major developments through the Council's requirement for Climate Change & Sustainability Statement (see draft Design SPD), but due to the potential for this site to act as local example of best practice, the specific reference to these benchmarks would provide for a clearer statement of the aspirations for the site.
- 2.19** Whilst the general thrust of the proposal as a whole would indicate that this is going to be a public facility (rather than a private health club), this is implicit rather than explicit. To give certainty that the proposal does deliver against the objectives for local needs it would be beneficial if the proposal was more specific about the requirement for affordable leisure facilities.
- 2.20** The SA at preferred options recognised the importance of encouraging a modal shift towards more sustainable means of transport. The proposal goes some way to recognising this issue but only focuses on the need for contributions towards provision of new infrastructure. To gain certainty that the required modal shift will be delivered the Life Centre will need a range of demand management measures to accompany this new infrastructure and the proposal would be improved if it reflected this.

## Recommendations

**2.21** The impacts of the proposal could be minimised and the beneficial effects maximised, through the following measures:

- State that development should seek to achieve the BREEAM excellent standard
- Specific reference should be made to integration of biodiversity as a key design consideration
- The proposal should make specific reference to the use of local labour, materials and the sale of local products
- Include a requirement for (or contributions towards) demand management with regards to transport and the use of the car park and Park & Ride
- The proposal should make clear that the facilities will be affordable for all. A suggested rewording would be in the opening sentence: "...integrated state of the art *affordable* leisure facilities .."
- The management structure of the Life Centre should include the surrounding local community and users of the centre
- Proposal should recognise the potential for the Life Centre to become a local exemplar of sustainability.

## Plymouth Argyle's Home Park Development

### Changes from the Preferred Options

**2.22** This proposal was previously expressed as part of Preferred Option 1: The Life Centre.

### Revised SEA/SA Assessment

**2.23** The proposal performs better against the sustainability objectives than the preferred option. Key positive changes and/ or additions are :

- The recognition that a Combined Heat and Power system needs to be considered as part of an integrated solution with adjoining development site is a very positive addition in respect to SA objectives for climate change, energy & resource use

**2.24** The proposal will also have an obvious positive impact on leisure, and also distinctiveness and cultural heritage with the high quality composition of buildings and distinctive design solutions. The commercial elements should help boost the local economy within the leisure sector, but in similar vein to comments made regarding the proposal for the Life Centre the assessment

has raised concerns about whether there is enough security within the AAP or its supporting policy framework ie (LDF Core Strategy) to ensure that a key facility for the city's infrastructure delivers the full potential for local economic multipliers and local employment needs.

- 2.25** The proposal would also benefit from recognising that there is a shortage of Plymouth based examples in terms of renewable energy and sustainable construction, and this is acting as a barrier to encouraging uptake on other sites in the locality. Home Park is an iconic location for the communities of Plymouth and provides an ideal focus for an exemplar of this form. In this respect it would be beneficial if the proposal was more explicit in relation to specific sustainable construction benchmarks, and about the need to seek innovative integration of biodiversity into the built form (for example the use of green/brown roofs). Using these benchmarks within the proposal would address the current uncertainty as to how the Life Centre responds to the sustainability objectives for waste and pollution.
- 2.26** These issues should now be considered as part of all major developments through the Council's requirement for Climate Change & Sustainability Statement (see draft Design SPD), but due to the potential for Central Park to act as local example of best practice, the specific reference to these benchmarks would provide for a clearer statement of the aspirations for the site.
- 2.27** The SA at preferred options recognised the importance of encouraging a modal shift towards more sustainable means of transport. The proposal goes some way to recognising this issue but only focuses on the need for contributions towards provision of new transport infrastructure. To gain certainty that the required modal shift will be delivered, Home Park will need a range of demand management measures to accompany this new infrastructure and the proposal would be improved if it reflected this.

### Recommendations

- 2.28** The impacts of the proposal could be minimised and the beneficial effects maximised, through the following measures:
- State that development should seek to achieve the BREEAM excellent standard and recognise the potential for Home Park to become a local exemplar of sustainability
  - Specific reference should be made to integration of biodiversity as a key design consideration
  - The proposal should make specific reference to the use of local labour, materials and the sale of local products
  - Include a requirement for (or contributions towards) demand management with regards to transport and the use of the car park and Park & Ride.

## A Transport Interchange

### Changes from the Preferred Options

**2.29** There have been no significant changes since the Preferred Options.

### Revised SEA/SA Assessment

**2.30** Whilst there have been no significant changes since the publication of Preferred Options the revised appraisal conclude that the contribution of this proposal towards the SA Objectives for Climate Change, Safety and Local Distinctiveness had been undersold. The proposal sets out to improve legibility, the quality, and sense of arrival, associated with the public realm at an important entrance to the park, which will contribute positively to the latter two objectives. In terms of climate change, the need to encourage a modal shift away from car based transportation is central to efforts to mitigate global warming and high quality public transport facilities are necessary requirement to deliver this. The specific reference to the requirement for healthy eating retailing and renewable / energy efficient design solutions is very welcome and will support the delivery of *destination Central Park* as a local exemplar of sustainability.

**2.31** Evidence from the Extended Phase 1 Habitat Survey indicates that previous concerns regarding a negative impact on biodiversity are unfounded. Concerns regarding the large areas of hard surfacing, and potential problems with surface water drainage will be addressed through Plymouth's Adopted LDF Core Strategy policy on Flood Risk.

### Recommendations

**2.32** No recommendations are made.

## A New Social Centre

### Changes from the Preferred Options

**2.33** This proposal was included as part of Preferred Option 2: An improved parkland.

### Revised SEA/SA Assessment

**2.34** The proposal performs positively in terms of climate change and resources with specific reference to SUDS and reusing surface water. The proposal will also improve the safety of the area, as it will improve surveillance and help towards 'designing out crime' by increasing activity day and night in an area which is currently perceived as being unsafe after dark.

**2.35** The proposal will also help to maintain and strengthen the city's character and identity by providing a unique identity for Central Park. Basic needs will also be supported with a facility that is open to all.

## Recommendations

**2.36** No recommendations are made.

## An Events Field

### Changes from the Preferred Options

**2.37** This proposal was part of Preferred Option 2: An improved parkland.

### Revised SEA/SA Assessment

**2.38** The proposal will improve the safety of the area, bringing life day and night to an area which currently suffers from poor surveillance. It will also provide a distinctive meeting space and improve access to a leisure facility.

## Recommendations

**2.39** No recommendations are made.

## Improvements to the Natural Environment

### Changes from the Preferred Options

**2.40** This proposal was part of Preferred Option: An improved parkland. The proposal includes additional detail on measures to improve and enhance the parks landscape & biodiversity assets, enlarging the existing Barn Park pond to form a lake and ecological wetland, and forming an irrigation lake to serve the allotments alongside Peverell Park Road to form an ecological wetland.

### Revised SEA/SA

**2.41** This proposal performs positively against SA objectives for biodiversity, learning (interpretation of local history, wildlife and views), health (increased access to healthy lifestyles and contact with nature), climate change (enhances a key part of the city's biodiversity network) & cultural heritage. The biodiversity element of the element could be improved through the inclusion of targets for the quantity and quality of different habitats to be conserved / restored.

## Recommendations

**2.42** The proposal could be improved by including specific targets for delivery of habitat enhancements that contribute towards Devon Biodiversity Action Plan Targets for Species Rich Hedgerows and Flower Rich Meadows and Pastures eg restore or recreate 4ha of Flower Rich Meadow.

## New and Existing Routes

### Changes from the Preferred Options

**2.43** This proposal was part of Preferred Option 3: A well connected park. The footpath providing a link from the park to Peverell Park Road has been changed to the Alternative Option suggested in the Preferred Options report. The Preferred Options SEA/SA supported the Preferred Option route, however the route now put forward was suggested by the allotment holders and supported by many of the representations. This proposal avoids fragmenting the existing community of allotments.

### Revised SEA/SA Assessment

**2.44** The proposal as a whole scores positively against the majority of sustainability objectives. Concerns about the proposals impact on biodiversity have been alleviated by evidence from Phase 1 Habitat Survey and by amendments to alignment of proposed routes .

### Recommendations

**2.45** No recommendations are made.

## A Link Between Park and City

### Changes from the Preferred Options

**2.46** This policy was part of Preferred Option 3: A well connected park. It has been changed from a proposal to policy due to concerns regarding deliver ability, however it remains as a long term aspiration.

### Revised SEA/SA Assessment

**2.47** The policy scores positively for climate change and energy through it's requirement for a sustainable design solution and energy efficiency. The link would clearly need to be distinctive and would provide a landmark for this area of Plymouth. Health, transport and leisure also score positively with provision of a pedestrian and cycle route, the consideration of public transport, and the improvement in access to this large recreational facility.

### Recommendations

**2.48** No recommendations are made.

## A Park with Improved Facilities

### Changes from the Preferred Options

**2.49** There are no significant changes to the Preferred Options. The proposal does include an extra criterion on improving the allotment boundaries to improve security and planting.

### Revised SEA/SA Assessment

**2.50** To ensure that new or restored facilities blend into their green space surroundings, and maximise the potential for biodiversity enhancement the opportunities for green or brown roofs should be considered as part of design solutions.

### Recommendations

**2.51** The proposal could be improved by include a requirement for green and brown roofs in development of improved facilities.

## Peverell Park Road, Outland Road Corner

### Changes from the Preferred Options

**2.52** There has been a slight change to the quantum of housing proposed on the site.

### Revised SEA/SA Assessment

**2.53** The proposal scores more favourably than the preferred option against the objectives for Climate change, resources, energy and waste due to the stronger policy framework provided by the adopted LDF Core Strategy and draft Design SPD. The work to reinforce the neighbourhoods local centre supports the objective for local needs, and the improvements to the Park entrance in this location proactively address historical problems with safety and crime.

### Recommendations

**2.54** There are no additional recommendations.

## Pennycomequick

### Changes from the Preferred Options

**2.55** The proposal no longer includes the new residential development on the vacant and disused allotment site, except for a small encroachment along the western boundary.

### Revised SEA/SA Assessment

**2.56** The Extended Phase 1 Habitat Survey identified the disused allotment site as being one of the more ecologically diverse areas within park, and its retention is therefore a positive contribution to the biodiversity objective. The proposal proactively addresses the need to provide passive surveillance and improve safety in this part of the park. Improvements will also be made to access with better linkages between the park and the City Centre. Basic needs will be met by the provision of affordable housing.

### Recommendations

**2.57** There are no additional recommendations.

### Monitoring

**2.58** The SEA Directive requires that the significant environmental effects of implementing a plan or programmes should be monitored. SA monitoring needs to cover the effects on the wider socio-economic components of the plan, as well as the environmental effects.

**2.59** This appraisal of Central Park AAP has identified the following issues that are considered to present a risk of generating a 'significant effect':

- Transport- the proposals for the Life Centre and Home Park are reliant on the success of the improved public transport system and must encourage a modal shift.
- Delivery of renewable and energy efficient design solutions.
- Delivery of high standards of sustainable construction.

**2.60** Plymouth City Council will develop a SA monitoring framework that considers these significant risks / effects as a part of its Annual Monitoring Reports for the LDF.

## 3 Conclusions

- 3.1** There have been a number of changes to the Central Park AAP between the publication of the Preferred Options document and the submission version. This report finds 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 is on the maximisation of beneficial effects arising from the proposals.
- 3.2** The report makes 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 recommends that proposals include demand management measures to ensure that the required model 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, ie 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.



## **4 Appendices: An assessment of health impacts, Equalities Impact Assessment and Habitat Regulations Assessment**



## Central Park AAP

### Assessment of Health Impacts

*Healthy Plymouth 2008-2020*, the city's health, social care and well being strategy (currently out for consultation) identifies the key health issues in Plymouth and the priority actions for tackling them.

The strategy's vision is:

That Plymouth is a city where effective partnership working enables services to be designed around the unique needs of individuals and communities to improve their well-being both now and in the future

The 3 over-riding aims are:

1. to improve health and overall wellbeing
2. to decrease health inequalities
3. to increase the quality of life and independence of people living with illness or disability

The strategy identifies the key determinants of health. Of the individual lifestyle factors it identifies the challenge of dealing with the increase in overweight and obese people as one of the biggest in public health, having potential consequences in all service areas. It also states that levels of physical activity are amongst the lowest in the south west. Stress is also on the increase, leading to mental health problems and a deterioration in physical health.

In relation to social and community factors, the strategy cites community cohesion, community safety, accessibility and leisure and cultural activities as being some of the key determinants in the city, and ones that spatial planning can impact upon. Deprivation also has an effect on health and wellbeing. Whilst there are pockets of deprivation in every neighbourhood, certain neighbourhoods such as those in the centre and east of the city are particularly deprived.

The strategy identifies 5 key priorities:

1. to tackle health inequalities
2. health prevention and promotion
3. mental health promotion
4. access and design of specific services
5. promotion of integrated services to promote independence

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 was originally created in the 1920s, with the specific objective of promoting active recreation and sport, enabled by the Ministry of Health. The

AAP presents an exciting opportunity to re-visit the original park designs and objectives. 2021 will see a Life Centre, a high quality sports and leisure complex with a strong focus on health; a new high quality transport interchange giving access to the park from all parts of the city; and an improved network of paths and gateways linking the park with surrounding neighbourhoods.

Amongst the key health benefits of the AAP are:

- The Life Centre – state of the art leisure facilities, indoor sports, swimming, and health facilities, dance, music and ice skating facilities, and a café with healthy eating outlets
- Development of Plymouth Argyle's Home Park – private sporting facility, healthy eating outlets
- Public transport interchange – cycle storage, healthy eating outlets
- New and existing footpath and cycleway routes
- New link between the park and the city – including pedestrian and cycleway routes
- Improved park facilities – new and improved sports pitches and improved childrens play facilities

It is clear that every effort has been made to ensure that the Central Park AAP proposals maximise the opportunities for achieving health benefits. The improved Park and associated developments will:

- Increase opportunities for improving health and wellbeing by providing new and improved sports facilities,
- Encourage people to participate in informal physical exercise by improving the general environment, free public facilities and the appeal of the park etc
- Increase opportunities for improving health and wellbeing by providing affordable healthy eating outlets
- Tackle health inequalities by significantly improving public transport and pedestrian/bicycle access to the park from some of the more disadvantaged neighbourhoods
- Tackle health inequalities and promote health by improving facilities such as public toilets, footpaths, increased childrens play areas etc
- Increase opportunities for improving health and wellbeing by providing easy access healthcare facilities which are accessible and attractive to users of the park and local residents
- Maximise the health benefits of existing and new allotments on the park both through spatial planning (eg spatial provision and design) and partnership working with allotment holders, voluntary groups, health agencies etc
- Increase quality of life and independence of people with a disability or illness by ensuring that the improvements are designed with access for these groups in mind

December 2007

# **Equality Impact Assessment of Central Park Area Action Plan Submission Document – December 2007**

The purpose of this report is to set out the vision, objectives and proposals of the Central Park Area Action Plan and to assess these for the likely impact they will have on the six equality groups. Data collected from public consultations is used to inform this analysis and to identify the planning issues of most importance to equality groups. This report concludes that the Central Park Area Action Plan submission document will not have any negative impacts on any of the equalities groups and will have many positive impacts, in particular in relation to health and wellbeing. Where appropriate, changes to proposals in the Central Park Area Action Plan submission document are highlighted.

## **1. Background**

### **1.1. Context**

This document represents the final stage in preparing Plymouth City Council's Central Park Area Action Plan. It has been produced for submission, and builds on an earlier preferred options document.

This Area Action Plan submission document forms part of a portfolio of documents called the Local Development Framework (LDF). The central document in the LDF is the Core Strategy which provides a strategic planning framework for the city, guiding development to 2021 and beyond. The Core Strategy sets out Plymouth's spatial vision – to turn Plymouth into 'one of Europe's finest, most vibrant waterfront cities where an outstanding quality of life is enjoyed by everyone'. Area Action Plans provide more specific detail on development opportunities within key areas of the city. This Central Park Area Action Plan submission document does not repeat the policies contained within the Core Strategy but the two plans should be read together to aid decision-making.

The LDF Core Strategy has been prepared in line with national planning policy and is in general conformity with regional planning guidance (RPG10) and the Devon Structure Plan 2001 – 2016. The Core Strategy adopts the overall vision and aims of the City Strategy and of the Corporate Plan, and will support their implementation. The Central Park Area Action Plan is in conformity with the Core Strategy and thus with the City Strategy and Corporate Plan.

### **1.2. Aims and objectives**

This document adopts a vision for Central Park to:

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.

The following objectives have been set:

1. To create a landmark regional Life Centre complex of high quality design and innovative technology.
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.
3. To create a safe and well-connected park with its surrounding neighbourhoods and the City Centre.
4. To provide high quality public and sustainable transport facilities serving the park and new facilities.
5. To improve and strengthen the relationship between the park and surrounding city in a sustainable manner.
6. To improve the range and quality of public facilities available to park users.

## **2. Data relating to equalities issues**

Three specific consultations have been undertaken to identify the views of equality groups:

### **Core Strategy Preferred Options Consultation**

Consultation on the Preferred Options of the Core Strategy and the Area Action Plan preferred options document for Central Park included a consultation with hard to reach groups (in conjunction with the consultation for the Local Transport Plan) in addition to the general public consultation. This was carried out in August/September 2005.

Presentations and workshops were held for:

- members of Black and ethnic minorities (contacted through FATA HE) – 4 attended
- disabled (contacted through the Guild of Voluntary Services) – 6 attended
- young people (contacted through the Plymouth Youth Parliament) – 4 attended
- elderly (contacted through old people's organisations) – 9 attended.

Plymouth Pride were contacted but declined the offer of a workshop. They requested copies of the reports instead.

The hard to reach consultation for the Core Strategy preferred options has been written up as a report.

### **Gender Audit**

A Gender Audit of the Local Plan Review was carried out in 2001. The aim was to 'gender proof' the plan in order to ensure that all strategies, policies and proposals openly and actively take into account their effects on the respective situations of women and men, and where necessary use specific policies to promote equality. Preparation of the audit involved focus group discussions with women and men and consultations with planning staff.

The gender audit helped to identify gender issues arising from policies and was used to inform production of the First Deposit Local Plan Dec

2001. It also suggested how the plan could be monitored to ensure that it was addressing gender issues in its implementation.

### **Community Planning Studies**

Community Planning Studies were undertaken in 1998 as part of the Local Plan review consultation programme to inform the development of a new planning strategy and policies. These studies involved holding stalls at fetes and fun days; a schools consultation exercise and community planning workshops. They covered the whole city to include over 6,500 residents. Hard to reach groups were contacted as follows:

- Race – contacted through the annual RESPECT Festival and by letter.
- Travellers – group contacted by letter.
- Faith groups – places of worship informed of events; Muslim and Jewish groups contacted by letter.
- Age – old people through the Senior Citizens Forum (presentation and workshop). Young people (at primary and secondary level) through the schools consultation exercise.
- Disability – workshop together with the Plymouth Guild of Voluntary Service.
- Gender – women’s groups contacted by letter.
- Sexual orientation – groups were contacted by letter.

The data collected from this exercise were written up as 21 Community Planning Studies (published in 2000), one for each ward in the city and one general study covering city-wide issues. Separate reports were produced for Drake and Trelawny communities. The issues raised were used to inform the development of the First Deposit Local Plan (published December 2001).

In addition to these consultations, a number of studies have been conducted looking at future options for Central Park, as detailed in the Central Park Area Action Plan submission document.

#### **2.1. Gaps/inadequacies in the data**

The Community Studies and the preferred options hard to reach consultations showed that contact by letter is not necessarily sufficient to engage with equalities groups, especially those that traditionally have had little engagement with the planning process. As a result, no specific consultation was carried out with faith or sexual orientation groups, and many of the hard to reach workshops were poorly attended. Other means of communication will be needed in future in order to build all groups’ capacity to engage. Future consultations will be guided by the Statement of Community Involvement.

#### **2.2. Issues raised by the consultations**

The following general issues of concern to equalities groups throughout the city have been identified:

- Lack of affordable and special needs housing.
- Difficulty in travelling to work and accessing services.
- Lack of accessible streets and buildings.

- Need for socially inclusive neighbourhoods with a range of facilities and amenities.
- Safety concerns – fear of crime but also road safety and personal safety.
- Need for opportunities to learn and to work.

The Community Planning Studies for Drake and Trelawny identified the following issues of concern for equalities groups in relation to Central Park:

- Concerns over safety hazards to children while playing in Central Park (broken glass etc).
- The need for an adventure park.
- General safety concerns and the desire to have more park wardens.

In addition, wider concerns about the need for affordable housing – especially for families – and road safety were raised.

Issues addressed in this Area Action Plan submission document include:

- The need to integrate the proposals for the Life Centre within the existing parkland landscape.
- The poor relationship of existing buildings and facilities with the park.
- Degraded sense of place within the park.
- The poor quality of private and public transport facilities.
- The difficulty people have in accessing the park from surrounding neighbourhoods and the City Centre because of busy highways.
- Poor relationship between the park and surrounding neighbourhoods.
- Lack of public facilities within the park.

The public consultation of the Central Park Area Action Plan preferred options raised the following concerns –

- Support for improvements to the park and to sports facilities but concern over any loss of green space from development – both the Life Centre and residential.
- Concern over any proposed loss of allotments.
- Support for improvement to footpaths and for improved park facilities.
- Concern over the proposed closure of the park and ride and any loss of parking at Peverell Park Road.
- Concern over traffic congestion that might arise as a result of the redevelopment of Milehouse Junction and the bus depot.

A special consultation was carried out with young people who expressed support for improved play and sports facilities and expressed concern over safety and the need for park wardens or other security.

### **3. Key findings**

In order to assess whether the Area Action Plan submission document addresses these issues, the objectives and the proposals have been mapped against the issues of most concern to equalities groups, and the results are shown in Tables 1 and 2.

Table 1 – Objectives against equality issues

Objective	Housing needs	Travel	Accessibility	Inclusivity	Safety	Economy
1		✓	✓	✓	✓	✓
2			✓	✓	✓	
3		✓	✓	✓	✓	
4		✓	✓	✓	✓	
5	✓	✓	✓	✓	✓	✓
6			✓	✓	✓	

Table 2 – Proposals against equality issues

Preferred Option	Housing needs	Travel	Accessibility	Inclusivity	Safety	Economy
CP1 (Life Centre)		✓	✓	✓	✓	✓
CP2 (Home Park)		✓	✓		✓	✓
CP3 (A Transport Interchange)		✓	✓	✓	✓	
CP4 (Park enhancements)		✓	✓	✓	✓	
CP5 (Peverell Park Rd, Outland Rd Corner)	✓	✓	✓	✓	✓	✓
CP6 (Pennycomequick)	✓	✓	✓		✓	
CP7 (Improved facilities)			✓	✓	✓	✓

These tables show that the Central Park Area Action Plan submission document addresses all of the equality issues. The issues are addressed in the submission document in the following ways:

- Housing needs are addressed by the proposals for new housing development at Peverell Park Road/Outland Road Corner and Pennycomequick. The proposals include a requirement for Lifetime Homes but not for affordable housing. This reflects the special character of this Central Park Area Action Plan and the priority to enhance the park.
- Travel concerns are addressed by proposals that will both reduce the need to travel by car by focusing facilities within the Life Centre and improving access to the park for pedestrians, cyclists and public transport users. The submission document responds to public concerns by proposing to retain the park and ride service.
- Accessibility concerns are addressed by proposals to improve access to the park and the condition of paths and facilities which will enable

people with physical disabilities and carers with young children to visit the park.

- Inclusivity concerns are addressed with the proposed Life Centre facilities as well as proposed improvements to local facilities at Peverell which will provide improved facilities and services to the local population and to visitors to the park.
- Safety concerns are addressed by proposed improvements to the condition of paths and lighting in the park, the greater vibrancy that will be created by the proposals in this Area Action Plan submission document and improved natural surveillance through better design of buildings and spaces.
- Economy concerns are addressed by proposals for new employment in the Life Centre and other park facilities.

In order that the full benefits are realised, it is important that new developments are well designed to maximise natural surveillance and accessibility benefits, as required by the LDF Core Strategy.

The impacts have also been assessed by equality group:

### **3.1. Race**

It is considered that the Central Park Area Action Plan submission document will have a positive impact by promoting equality of opportunity. The Central Park Area Action Plan, in conformity with the Core Strategy, will promote a better quality of life for all users of the park – including better social inclusion, accessibility and safety. It will also promote health and wellbeing, reduce the need to travel by car and improve the range and quality of facilities, services and amenities. New employment opportunities will be provided.

It is considered that this Area Action Plan submission document will have no adverse impacts on promoting good race relations or eliminating unlawful discrimination.

### **3.2. Faith and belief**

It is considered that this Area Action Plan submission document will have no adverse impacts on faith/belief groups.

### **3.3. Disability**

It is considered that this Area Action Plan submission document will have a positive impact on the quality of life of all people with a disability. Research has shown that high quality green space brings many health and wellbeing benefits to users, including physical, mental and social benefits. The Central Park Area Action Plan, in conformity with the Core Strategy, will promote a better quality of life for all users of the park – including better social inclusion, accessibility and safety. It will also promote health and wellbeing, reduce the need to travel by car and improve the range and quality of facilities, services and amenities. New employment opportunities will be provided. The new housing will include Lifetime Homes.

### **3.4. Gender**

It is considered that this Area Action Plan submission document will have positive impacts on the quality of life of both men and women, particularly for men and women who care for dependent children or elderly/disabled people. In particular, this plan, in conformity with the Core Strategy, will promote a better quality of life for all users of the park – including better social inclusion, accessibility and safety. It will also promote health and wellbeing, reduce the need to travel by car and improve the range and quality of facilities, services and amenities. New employment opportunities will also be provided.

### **3.5. Sexual orientation**

It is considered that this Area Action Plan submission document will have no adverse impacts on any of the sexual orientation groups.

### **3.6. Age**

#### **Young people**

It is considered that this Area Action Plan submission document will have a positive impact on young people's quality of life. The Central Park Area Action Plan, in conformity with the Core Strategy, will promote a better quality of life for all users of the park – including better social inclusion, accessibility and safety. It will also promote health and wellbeing, reduce the need to travel by car and improve the range and quality of facilities, services and amenities.

#### **Older People**

It is considered that this Area Action Plan submission document will have a positive impact on older people's quality of life. The Central Park Area Action Plan, in conformity with the Core Strategy, will promote a better quality of life for all users of the park – including better social inclusion, accessibility and safety. It will also promote health and wellbeing, reduce the need to travel by car and improve the range and quality of facilities, services and amenities. The new housing will include Lifetime Homes.

## **4. Recommendations**

This Equality Impact Assessment has identified that this Area Action Plan submission document for Central Park will have positive impacts on the quality of life of race groups, people with a disability, men and women, young people and older people. It is considered that there will be no adverse impacts on any of the equalities groups.

**Habitat Regulations Assessment of the Plymouth City Council  
Central Park Area Action Plan**

**Screening Report**

**November 2007**

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# 1. Introduction

This document has been produced to determine whether policies and proposals of Plymouth City Council's (PCC) Local Development Framework (LDF) Area Action Plan (AAP) for Central Park will have a significant adverse impact on nearby Natura 2000 sites.

## 1.1 Background

The Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Flora and Fauna – the 'Habitats Directive' provides legal protection for habitats and species of European importance. Article 2 of the Directive requires the maintenance or restoration of habitats and species of interest to the EU in a favourable condition. This is implemented through a network of protected areas referred to as Natura 2000 sites.

Articles 6(3) and 6(4) of the Habitats Directive requires Appropriate Assessment of plans and projects likely to have a significant effect on a European site. This means that the effects of such plans/projects on Natura 2000 sites need to be assessed to ensure that the integrity of these sites is maintained. The Central Park Area Action Plan is such a plan.

The Natura 2000 sites are of two types – Special Area of Conservation (SAC) and Special Protection Areas (SPA). SAC's stem from the Habitats Directive, and are mainly habitat features, whereas SPA's are features comprising populations of bird species. Each Natura 2000 site has a number of qualifying features, for which conservation objectives have been developed.

The purpose of a Habitat Regulations Assessment (HRA) is to assess the impacts of a land-use plan against the conservation objectives of the Natura 2000 Site. The assessment must determine whether the plan would adversely affect the integrity of the site in terms of its nature conservation objectives. Where negative effects are identified other options should be examined to avoid any potential damaging effects.

The Habitats Directive applies the precautionary principle to SPA's and SAC's. Plans can only be permitted having ascertained that there will be no adverse effect on the integrity of the site(s) in question. Plans may still be permitted if there are no alternatives to them and there are imperative reasons of overriding public interest as to why they should go ahead. Previous rulings show that these cases are rare. In such cases, compensation will be necessary to ensure the overall integrity of the site network.

It is intended that this HRA will be used to consider the potential effects on Natura 2000 sites arising from the plan, and identify any necessary changes to policy / proposals, and/or identify alternatives or mitigation that could improve the AAP prior to its submission.

The HRA for Plymouth's LDF Core Strategy was completed in February 2007. This identified a number of necessary avoidance measures required to manage impacts associated with the Core Strategy and identified a number of suggested changes to the document that were incorporated before its adoption. A summary of the conclusions from Core Strategy Habitat Regulation Assessment is included in Appendix 1. Consideration of the potential for the Central Park AAP to have a significant effect will be made in the light of this existing work.

## **1.2 Methodology used for this Habitat Regulations Assessment**

DCLG (2006) guidance on Planning for the Protection of European Sites: Appropriate Assessment (consultation document) recommends a 3 stage process:

1. Screening. Determining whether the plan 'either alone or in combination with other plans or projects' is likely to have a significant effect on a European site
2. Appropriate Assessment. Determining whether, in view of the site's conservation objectives, the plan 'either alone or in combination with other plans or projects' would have an adverse effect (or risk of this) on the integrity of the site. If not, the plan can proceed.
3. Mitigation & Alternatives. Where the plan is assessed as having an adverse effect (or risk of this) on the integrity of a site, there should be an examination of mitigation measures and alternative solutions. If it is not possible to identify mitigation and alternatives it will be necessary to establish the '*imperative reasons of overriding public interest*' (IROPI). This is not considered a standard part of the process and will only be carried out in exceptional circumstances.

All 3 stages of the process are referred cumulatively as Habitat Regulations Assessment, to clearly distinguish the whole process from the step within it referred to as the Appropriate Assessment.

## **1.3 Consultation with Natural England**

Natural England (NE) has been positively engaged in PCC's work on Habitat Regulations Assessment since its inception in November 2006. An open & constructive dialogue has been maintained throughout the process, and NE has endorsed the conclusions of Plymouth's previous HRA work. NE have been consulted on this screening report and agree with methodology and the reports conclusions.

## 2. Screening

The principle aim of this chapter is to 'screen' the potential of Central Park AAP for its likely impact on the Natura 2000 sites within 15 kilometres of the city boundary.

In undertaking the screening stage of Plymouth's LDF Core Strategy HRA a highly precautionary approach was adopted. At that stage no assumptions or allowances were made for existing regulatory mechanisms (eg EA's regulatory role), management structures (eg. Tamar Estuaries Consultative Forum), or the LDF's policies or proposals that seek to conserve, or enhance the natural environment. The role these tools have to play in ensuring that the Plymouth's LDF does not adversely affect the integrity of the Natura 2000 sites where examined in detail as part of Core Strategy Appropriate Assessment.

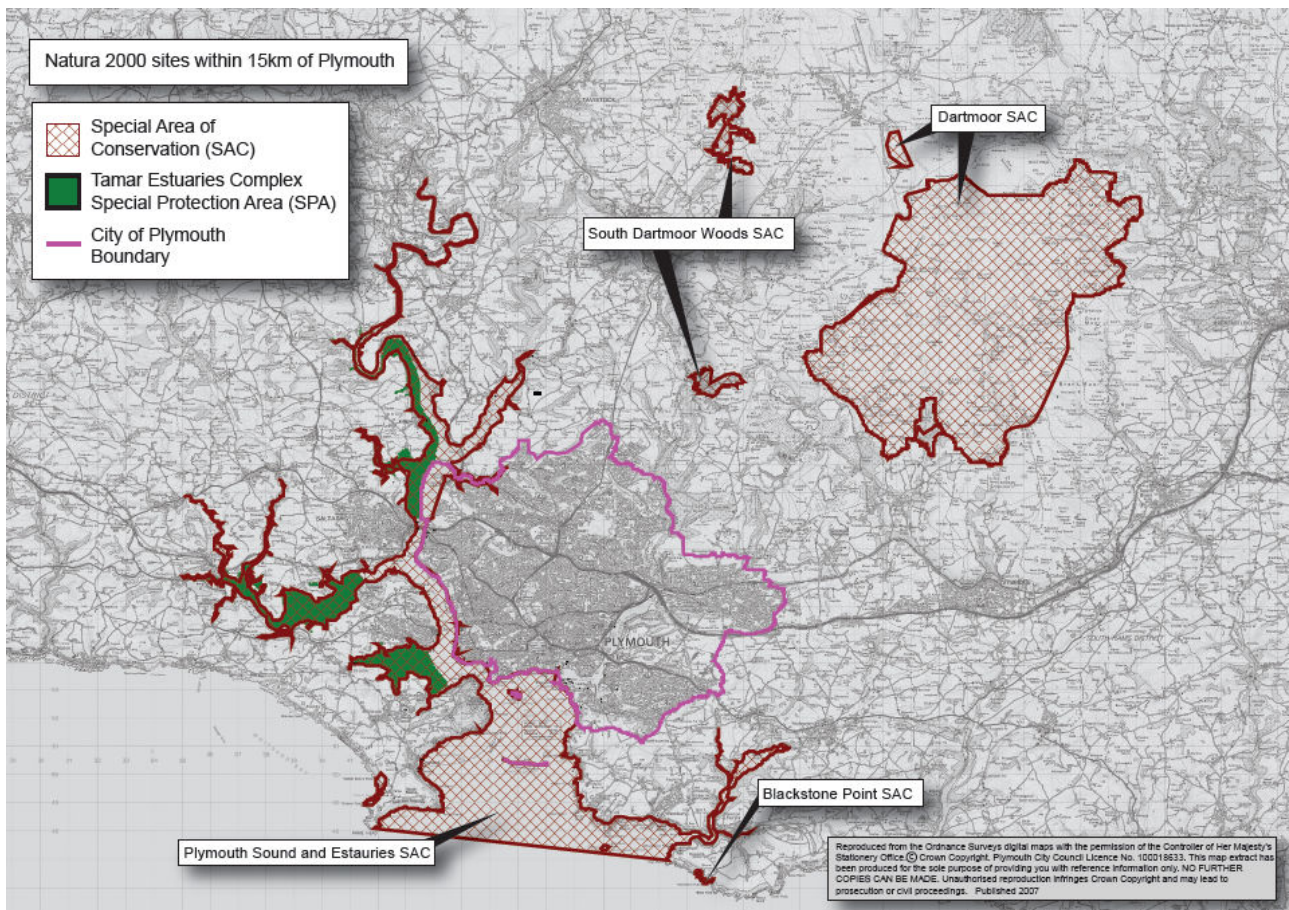
The policies and proposals contained with the Central Park AAP are built upon the foundations expressed with the Core Strategy. Therefore in determining whether there is a risk of significant effect this assessment will 'screen out' those impacts already identified and addressed through the Core Strategy HRA. The screening stage of this HRA will also take a precautionary approach but will only seek to identify the impacts that are at risk of becoming significant as a result of the specific detail identified in the AAP.

### 2.1 European Sites

Table 1 lists the European sites that are within 15 km of the boundary of Central Park AAP

Name of Site	Reasons for Designation
Plymouth Sound & Estuaries SAC	Sandbanks which are slightly covered by sea water all the time. Estuaries. Mudflats and sandflats not covered by seawater at low tide. Large shallow inlets and bays. Atlantic Salt Meadows Reefs. Shore dock. Allis shad
Tamar Estuaries Complex SPA	Internationally important populations of Avocet & Little Egret
Dartmoor SAC	Northern Atlantic wet heath with <i>Erica tetralix</i> . European dry heath. Blanket bog. Old sessile oak woodlands <i>Ilex</i> and <i>Blechnum</i> in the British Isles. Southern damselfly, <i>Coenagrion mercuriale</i> Otter <i>Lutra lutra</i> Atlantic salmon <i>Salmo salar</i>
South Dartmoor Woods SAC	Old sessile oak woodlands <i>Ilex</i> and <i>Blechnum</i> in the British Isles European dry heath
Blackstone Point SAC	Shore dock

**Table 1: European sites within 15km of Plymouth City Boundary**



**Map 1 Distribution of Nature 2000 sites within 15km of Plymouth city boundary**

## 2.2 Broad content of the Central Park AAP

Central Park is strategically important park covering a 92 hectares. Maps 1 & 2 below show the areas location and layout. The park includes the city's football club, a large swimming pool & recreation centre, the Milehouse Park and Ride car park, sports fields, formal gardens, a skate park, play equipment, allotments, woodland and meadows.

The AAP sets out the following vision for the park's future:

*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.*

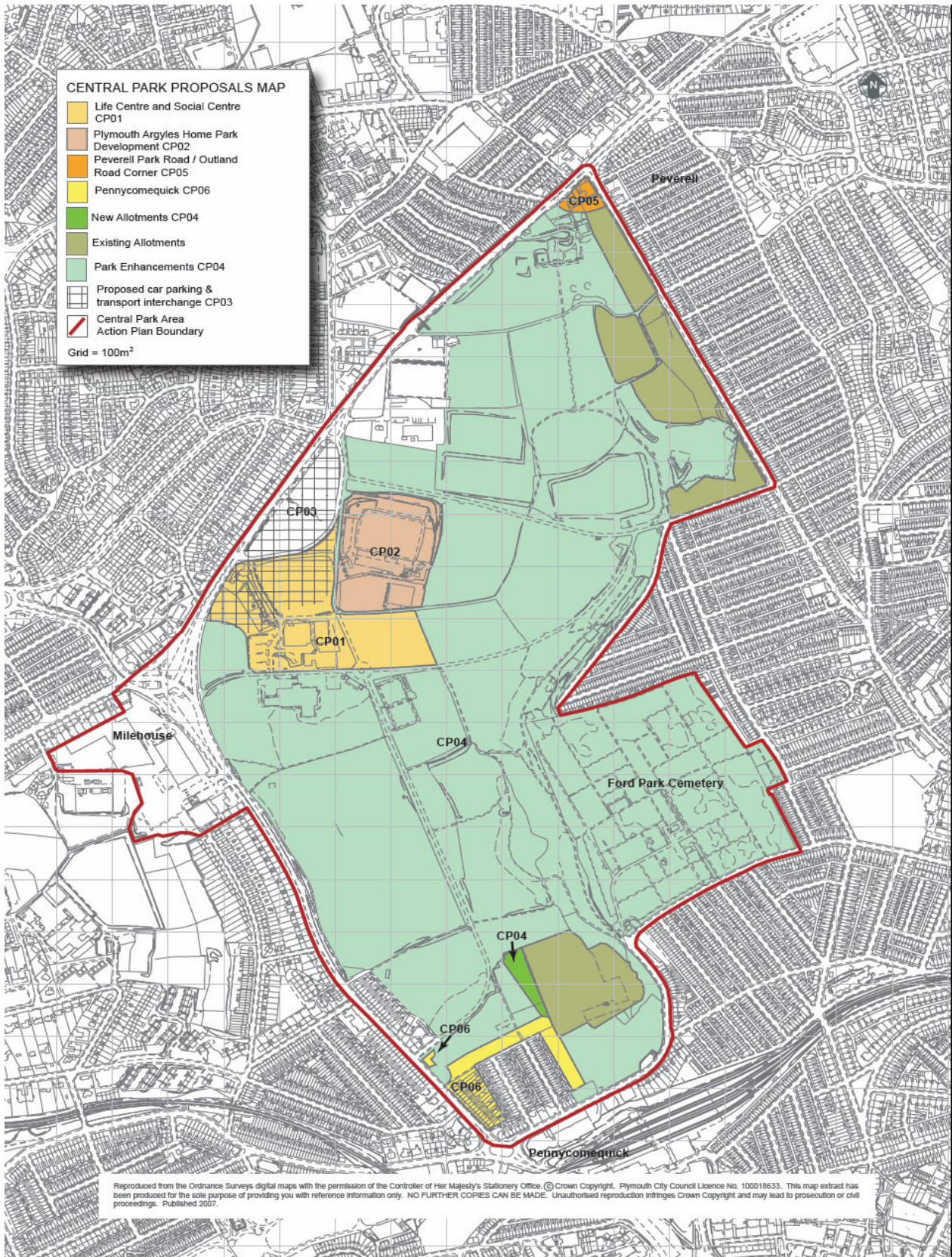
*The Council's objectives to deliver this vision are:*

- *To create a landmark regional Life Centre complex of high quality design and innovative technology*
- *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*
- *To create a safe and well-connected park with its surrounding neighbourhoods and the City Centre*
- *To provide high quality public and sustainable transport facilities serving the park and new facilities*
- *To improve and strengthen the relationship between the park and surrounding city in a sustainable manner*
- *To improve the range and quality of public facilities available to park users.*

The AAP as whole provides for a total of 110 new dwellings, 700m<sup>2</sup> of retail floor space and 5380m<sup>2</sup> of employment land.



**Map 2: City wide location for Central Park AAP**



**Map 3: Central Park AAP Proposals Map**

## 2.3 Existing Trends and Possible Future Development

The South West Regional Spatial Strategy (RSS) Sustainability Appraisal report identifies a range of 'likely negative effects' of the draft RSS. In particular:

- Increased carbon dioxide emissions due to increases in air travel within the region
- Reduction in air quality due to increased car travel within the region
- A gradual increase in light & noise pollution

These should be considered as having the potential to act in combination with Plymouth's Central Park AAP.

Table 2 below summarise developments in other areas of Plymouth, or nearby districts that could also lead to 'in combination' impacts with the AAP

Area	Development Plans or Proposals
Plymouth	Plymouth's LDF Core Strategy sets out a visions to deliver 24,500 dwellings between 2006 – 2026, 130ha of employment land between 2006 – 2026, and to achieving the city's potential as ' <i>economic hub of the far South-West</i> '. Impacts identified for Central Park DPD may work in combination with other impacts generated through the Core Strategy or other submitted Local Development Documents. e.g. Millbay & Stonehouse AAP, Devonport AAP Affordable Housing & Planning Obligations SPD
Caradon DC	1000 Residential dwellings (Draft RSS for South West 2006 - 2026)
South Hams DC	Sherford Area Action Plan - 4,000 dwellings by 2016 with potential expansion to 5500 dwellings Plymouth Urban Fringe AAP 500 dwellings, Existing permission for Langage Power Station

**Table 2: Plans or projects with potential 'In combination' impacts**

Plymouth City Council's recently published draft Affordable Housing & Planning Obligations SPD includes detail on how the authority will seek contributions for managing the impact of Plymouth's growth upon the Plymouth Sound & Estuaries SAC and the Tamar Estuaries Complex SPA. This was a requirement arising from the Core Strategy HRA (see Appendix 1) and provides a mechanism for all residential development within the City to contribute towards the costs of avoiding the impacts that more residents will bring to these Natura 2000 sites. The residential development within Central Park AAP will need to make contributions in this manner.

## 2.4 Screening – Site qualifying features and potential impacts

Table 3 documents the screening process for the SPA's/SAC's potentially affected by the Central Park DPD, and considers the significance of a range of possible impacts in relation to the individual sites qualifying features. A significant effect is considered to be one that is not trivial or inconsequential, but an effect that is potentially relevant to the sites conservation objectives.

**Table 3: Significant effects matrix for Plymouth City Council Central Park Area Action Plan**

Site	Qualifying Features	Possible impacts arising from the Central Park Area Action Plan	Is there a risk of significant effect?	Possible impacts from other trends, plans etc	Is there a significant risk of In combination effects?
Plymouth Sound & Estuaries SAC	Sandbanks which are slightly covered by sea water all the time. Estuaries. Mudflats and sandflats not covered by seawater at low tide. Large shallow inlets and bays. Reefs. Shore dock. Allis shad.	None	No	N/a	No
Tamar Estuaries Complex SPA	Little Egret 9% passage population in the UK & 8.4% wintering population; Avocet 15.8% of the wintering population in the UK.	None	No	N/a	No
Dartmoor SAC	Northern Atlantic wet heath with <i>Erica tetralix</i> . European dry heath. Blanket bog. Old sessile oak woodlands <i>Ilex</i> and <i>Blechnum</i> in the British Isles. Southern damselfly, <i>Coenagrion mercuriale</i> Otter <i>Lutra lutra</i> Atlantic salmon <i>Salmo salar</i>	None	No	N/a	No
South Dartmoor Woods SAC	Old sessile oak woodlands <i>Ilex</i> and <i>Blechnum</i> in the British Isles European dry heath	None	No	N/a	No
Blackstone Point SAC	Shore dock	None	No	None	No

## 2.5 Screening - Policy Review

Previous HRA's completed for Plymouth's LDF have been refined through a detailed review of individual policy & proposals within the AAP. This step has been used to identify which specific policies and or proposals are driving the potential significant impacts identified in section 2.4. This is considered to be an unnecessary step for Central Park AAP as Table 3 has identified that there is no risk of significant effect upon any of the identified Natura 2000 sites.

## 2.6 Conclusions – Habitat Regulations Assessment - Screening Stage

PCC's Central Park AAP sets out the council's policy in relation to future investment in the City's premier park. Its focus is the provision of new health and leisure facilities and the improvements to the Park. This assessment has considered the broad scope of the AAP and the impacts that it may generate in relation to Natura 2000 sites qualifying features. This process has led to the conclusion that **there will be no significant adverse impact on the integrity of the Natura 2000 sites as a result of Plymouth's Central Park Area Action Plan.**

## Appendix 1: Summary of conclusions from Core Strategy Habitat Regulation Assessment

The results of Plymouth LDF Core Strategy Habitat Regulation Assessment are summarised as :

Screening the potential impacts of Plymouth's LDF Core Strategy against the local Natura 2000 sites qualifying features identified the following potentially significant adverse impacts:

- Water quality impacts at Plymouth Sound & Estuaries SAC, Tamar Estuaries Complex SPA & Dartmoor SAC
- Recreational disturbance impacts at South Dartmoor Woods SAC, Dartmoor SAC, Plymouth Sound & Estuaries & Tamar Estuaries Complex SPA
- Biological Disturbance impacts from shore crab fishery & bait digging at Tamar Estuaries Complex SPA
- Impacts linked to water abstraction at Plymouth Sound & Estuaries SAC, Tamar Estuaries Complex SPA, Dartmoor SAC & South Dartmoor Woods SAC,
- Impacts linked to air quality changes at South Dartmoor Woods SAC & Dartmoor SAC
- Cumulative impacts of habitat loss associated with numerous small scale land claim events within Plymouth Sound & Estuaries SAC & Tamar Estuaries Complex SPA

Screening the LDF Core Strategy's objectives & policies against the above sites and potential impacts ( identified the following statements that may cause *'Possible adverse effect on the Natura 2000 sites'*:

- SO1 Delivering Plymouth's Strategic Role
- AV2 Millbay & Stonehouse
- CS12 Culture & Leisure Considerations
- CS25 Provision for Waste Management
- SO14 Delivering Sustainable Transport
- CS27 Supporting Strategic Infrastructure Proposals

All of the above will now include within the policy, or the explanatory text, wording that makes it clear any development directed or encouraged by this policy, which is determined to have an adverse affect on the Natura 2000 sites, would not be in accordance with the LDF.

The Core Strategy HRA policy review matrix also identified the following objectives & policies of Plymouth's LDF Core Strategy that are *'Likely to have a significant adverse effect on Natura 2000'*

- SO10 Delivering Adequate Housing
- CS16 Spatial Distribution of Housing Sites
- SO6 Delivering the Economic Strategy
- CS04 Employment Provision

An Appropriate Assessment (AA) scrutinised the role of these policies in driving the full range of impacts noted above. **The AA concluded that subject to the avoidance measures identified below the Plymouths LDF Core Strategy will not cause an adverse impact on the integrity of any Natura 2000 sites.** In addition to the avoidance measures each of these policies also should be accompanied by explanatory text that makes it clear any development directed or encouraged by this policy, which is determined to have an adverse affect on the Natura 2000 sites, would not be in accordance with the LDF.

**To avoid a significant adverse impact on the integrity of Plymouth Sound & Estuaries SAC, & Tamar Estuaries Complex SPA, arising from future recreational pressure Plymouth City Council will commit to the following:**

- 1. Partnership funding & support for the Tamar Estuaries Consultative Forum.*
- 2. Project funding & support: Provide funding and relevant officer time to support recreation linked actions / projects as identified in Tamar Estuaries Management Plan Chapter 1 and 10. This should include a review and update of Port of Plymouth Area Recreation Study as a priority.*
- 3. Preparation of a Planning Obligations SPD - Plymouth's forthcoming Planning Obligations SPD will include appropriate provisions for negotiating individual contributions towards managing recreational impact within Plymouth Sound & Estuaries European Marine site.*
- 4. Coastal Planning SPD - Inclusion of relevant guidance in relation to shore side development in respect to managing recreational use of surrounding waters.*

**To avoid significant adverse impact on the integrity of Plymouth Sound & Estuaries SAC, arising from numerous small land claim events Plymouth City Council will commit to the following:**

- 1. Additional explanatory text associated with Policy CS19 that makes clear that the policy relates to the development in inter tidal or sub tidal areas, as well as terrestrial habitats*
- 2. Preparation of a Coastal Planning SPD - Inclusion of relevant guidance in relation to inter tidal & sub tidal development*

The Appropriate Assessment process identified a number of impacts that are not significant but that should be addressed as part of raft of measures to improve sustainability of future DPDs, SPDs and site master plans. These are:

- 1. The importance of promoting water efficient design to minimise demand and moderate the requirement for waste water treatment. This could be pursued through requiring all new and refurbished buildings achieve the requirements of BREEAM and Eco Homes very good standard, or at least level 3 above minimum building standards in the emerging Code for Sustainable Homes. More detailed guidance in relation to requirements for water efficient design should be included in Plymouth's proposed Design SPD.*
- 2. The importance of ensuring that policies such as Plymouth's Core Strategy LDF CS19, CS 20 Resource Use, South West Regional Spatial Strategy Policy G Sustainable Construction, & Policy RE 1 are robustly applied.*
- 3. The need to continue the work identified in 'Charter for Countryside & Seas in and around Plymouth' (2005) to work with Natural England/ neighbouring authorities to plan / manage sustainable recreation at key sites within SE Dartmoor.*