

Plymouth City Council

Local Development Framework City Centre and University Area Action Plan

The Environmental Assessment of Plans and Programmes Regulations 2004

Environmental Statement

Introduction

Plymouth City Council adopted the City Centre and University Area Action Plan on 26th April 2010. 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 City Centre and University Area Action Plan, three key bodies are required to be consulted – the Environment Agency, English Heritage and Natural England (formerly English Nature and the Countryside Agency). During the 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, Issues and Preferred Options, and the formulation of the City Centre and University Area Action Plan up to and including Pre-Submission and submission.

Integrating Environmental Considerations into the City Centre and University Area Action Plan

In the course of its preparation, the City Centre and University Area Action Plan has been subject to a four-stage SEA/SA. The appraisal began with a Scoping Report in November 2004 (revised March 2008). The preliminary SEA/SA was then undertaken of the City Centre and University Area Action Plan Issues and Options, followed by Appraisal of the Issues and Preferred Options in October 2008, Pre-Submission in August 2009 and finally the Submission Draft in October 2009. 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. A Habitat Regulation Assessment was completed in October 2009.

Taking the Environmental Report into Account

The following section summarises the conclusions of each of the appraisal / assessment documents.

Issues & Options

A preliminary SEA/SA was undertaken for the Issues and Options document. This concluded that the proposals for the City Centre Area Action Plan appear broadly sustainable although, inevitably, some conflict of interest may arise and these issues are raised through the following questions:

- Whilst proposals for rationalising pedestrian routes throughout the city centre and to neighbouring communities will have a positive impact on amenity and address some issues associated with safety. Will alterations to the transport infrastructure generate negative effects elsewhere create “rat runs” and increase traffic congestion?
- Achieving sustainable urban communities is a positive approach to future planning. However in recreating and restoring residential areas it is important that housing stock and types meets the needs of the local community, are affordable and that the design of buildings is sensitive to the surrounding built environment and reflects/retains locally distinctive features.
- Will the proposals to introduce sensitive design and increase pedestrian and cyclist usage reduce crime, prostitution and improve safety or should additional/alternative solutions be explored?
- Proposals to ease pedestrian movements may encourage more people to travel on foot or by cycle around the city centre and could have a positive effect on economic growth, but it is questionable as to how far proposals will go in encouraging people to switch to alternative modes of transport.
- There is uncertainty associated with the utilisation of existing buildings, whether the development of a cultural quarter will reuse and restore existing buildings or whether existing green space will be utilised.
- Will proposals to intensify development through increasing density/height have a negative impact on townscape character in particular parts of the city centre? Consideration should be given to wind tunnelling, overshadowing, the proximity to historic buildings and green space.
- Proposals to extend activities outside shopping hours need to be carefully balanced against proposals to increase residential accommodation. Late opening hours and a possible increase in noise and rowdy behaviour may have a negative impact on local communities’ quality of life.
- It is important when considering the nature of development proposals to ensure that materials for construction are sourced locally and through sustainable design, energy and waste consumption is reduced.

Issues and Preferred Options

An Issues and Preferred Options Consultation Document was produced in October 2008 and consulted upon for 6 weeks. This was not a draft of the AAP, but instead set out a discussion of all the issues which had been identified as important, and set out a number of considerations which would be used to formulate a preferred strategy. The Sustainability Assessment of this document recognised that the City Centre & University Area Action Plan has a significant role to play in the sustainable development of the City Centre, and the wider Plymouth sub region. It explored the pros & cons of a number of the strategic options for the future development of the Area Action Plan. This analysis results in a number of recommendations which are summarised below:

- The approach to ensuring sustainable communities is the cross cutting theme throughout the strategy and should be strengthened and widened to include the principle of environmental limits. For the City Centre this is likely to mean a strategy that gives more emphasis to policy and proposals that promote low carbon approaches, and address the growing air quality issues. Improvements to essential drainage infrastructure may be required for development proposals around junction of Union St and Western Approach to ensure regeneration is future proofed against flood hazards caused by tide locking.
- Priority heritage assets need to be conserved on a clear understanding of their merit, and their conservation debated in the light of a wider understanding of the commercial pressures that will be key in providing local services for Plymouth's sustainable growth.
- The AAP must be informed by a vision and strategy for sustainable transport that provides a clear statement as to what those options are, and that matches the timescale and ambitions being expressed for regeneration and redevelopment. This work must be progressed as a priority.
- Low Carbon options should be given significantly more consideration within the strategic direction of the AAP. Reduction of carbon emissions in line with Plymouth's Local Area Agreement target should be included as an objective for the plan. The AAP can then maximise its potential as a vehicle for delivering against this target by focusing on interventions around the proposed transport strategy for city centre, and an integrated approach to low carbon energy solutions.

The Sustainability Assessment considered each of the Key Ingredients identified in Part 5 of the City Centre & University AAP Issues & Preferred Options Consultation Document, and made the following recommendations:

- Detail of delivery of quarters plan needs to hold strong to the sustainable communities golden thread and the importance of maintaining a mix of uses within the quarters to avoid impacts of land use zoning. Need to ensure sufficient emphasis placed in relevant zones for unit sizes that further the enterprise culture within the city and support business start up.

- Evolution of policies and proposals around large retail led redevelopment need to include strong commitments to Local Labour Agreements; the integration of low carbon energy solutions, and the consideration of the broad mix of uses needed for proposed new residential community
- The development of a policy approach that requires the retrofit of energy efficiency and renewable or low carbon energy solutions as part of renovation/refurbishment of key heritage assets.
- Sustainable movement principles need to be rebalanced in terms of a stronger vision and objectives for pedestrian, cycle and public transport movements.
- There is a need to integrate sustainable construction benchmarks as a key criteria for assessing delivery of quality design within the City Centre.

Pre- Submission and Submission

The Pre-submission draft of the City Centre and University Area Action Plan was published in August 2009 and consulted on for 6 weeks. This was the first time that a full draft of the AAP was produced. The AAP was then formally submitted to the Secretary of State in October 2009. The submission AAP was unchanged from the Pre-Submission draft AAP. The Pre-Submission SEA/SA was also therefore rolled forward as the Submission SEA/SA. The Pre-Submission stage SEA/SA concluded that since the City Centre and University AAP Issues & Preferred Options Consultation (November 2008) the plans for the City Centre had improved in the following areas:

- Specific proposals that positively respond to the climate change agenda by enabling the delivery of a Low Carbon Energy network.
- Specific recognition of measures needed to address flood risk around Western Approach and Colin Campbell Court.
- Proposals around North Cross now include measures aimed to reduce potential adverse impacts of development upon air quality.
- Significant support to improve pedestrian & cycle movement around the City Centre.
- Encouragement for local enterprise and markets for goods and service through policy support for the West End's role as a seedbed for small business, and as a focus for independent retailers.

The appraisal identifies that implementing the plan is likely to generate the following potentially significant adverse impacts, and recommends measures for monitoring these:

- Significant increases in the number of car-based trips to the City Centre
- Subsequent increases in the levels of carbon emissions
- Significant reductions in air quality around the Strategic Road Network.

The appraisal recommends that in taking forward the delivery of the plan, the

following areas of further work are required to ensure that the AAP's beneficial effects are maximised:

- A City wide Surface Water Management Plan
- Establishing an Energy Service Company to support delivery of low carbon energy network
- The proposed Public Realm Strategy should include measures for management & recycling of waste, and integration of cycling back into the City Centre precinct
- Future revisions of Plymouth City Council's Planning Obligations Supplementary Planning Document should consider greater support for local labour initiatives.

Habitat Regulations Assessment

A Habitat Regulations Assessment was completed for the Submitted City Centre and University AAP. This HRA considered the impact of the AAP on the biodiversity found within sites of European importance for nature conservation. The HRA identifies The potentially significant adverse impacts of the City Centre & University AAP as coming from water quality impacts at Plymouth Sound & Estuaries SAC and water quality impacts at Tamar Estuaries Complex SPA. The root cause of the potential water quality impacts is the capacity of existing surface water drainage systems to protect the SAC & SPA from the increase in contaminants within road run caused by the growth in traffic and rising intensity of storm events. The HRA also identified the need for the required drainage system improvements to be also driven by a need to protect water quality. A number of amendments were therefore made to the AAP, to tie these two issues together, and to ensure that the City Centre and University AAP avoids a significant adverse impact on the integrity of Plymouth Sound & Estuaries SAC, & Tamar Estuaries Complex SPA.

Conclusions

In summary, over the course of preparation of the City Centre and University Area Action Plan, the SEA/SA has helped to:

- Include proposals to deliver a Low Carbon Energy network.
- Specifically recognise the need to address flood risk and surface water drainage issues around Colin Campbell Court and Western Approach.
- Support measures to encourage more cyclist and pedestrian movements around the City Centre.
- Encourage local enterprise and markets for goods and services through policy support for the West End's role as a seedbed for small business, and as a focus for independent retailers
- Emphasise the role the City Centre's heritage can play in the future regeneration of Plymouth.

City Centre and University Area Action Plan Public Examination

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.

The Inspector made two key changes to the AAP. These were:

- A change to the way in which the AAP's approach to affordable housing in the City Centre is implemented. This change does not affect the AAP's overall approach to affordable housing in the City Centre and therefore does not affect the conclusions of the final SEA/SA.
- A change to Policy CC05 from a requirement for development to contribute to an encouragement. Although this change affects the way in which a Low Carbon Energy network will be delivered in the City Centre, it does not change the AAP's commitment to enabling such a network to be created. This change does not therefore affect the conclusions of the final SEA/SA.

Public Consultation

The consultations for the plan itself and the SEA/SA were conducted in parallel. The process completed was as follows. The City Centre and University Area Action Plan has been prepared in accordance with the Town and Country Planning (Local Development) (England) Regulations 2004 as amended in 2008, 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 reviewed in April 2009. The City Centre and University Area Action Plan exceeded its requirements – as noted by the Inspector. The Plan has been through three major stages of consultation – Issues and Options in March/April 2005, Issues and Preferred Options in November 2008 and Pre-Submission in August 2009. A full statement of the Council's pre-submission consultation on the City Centre and University Area Action Plan (Regulation 30 Statement) is available from the Council.

The Council has considered all the representations received. 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 City Centre and University Area Action Plan as it is implemented during the period of the Local Development Framework up to 2021. In addition to a monitoring framework included in the City Centre and University Area Action Plan itself, the SEA/SA includes a framework for monitoring a number of key effects of the Local Development Framework.