SEA/SA

of
Preferred Options for

DEVONPORT
Area Action Plan

Volume 2

Prepared for
Plymouth City Council

by

Land Use Consultants
and TRL

July 2005
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I. STATUS OF THE REPORT

Introduction

1.1. This report (Volume 2) forms the second part of the sustainability appraisal (SA) and strategic environmental assessment (SEA) of the Preferred Options for the Devonport Area Action Plan contained in Plymouth City Councils' local development framework. (The first part of the report is contained in the SEA/SA Context Report - Volume 1).

1.2. In addition to the review of preferred options for the Area Action Plan this report contains a reference to future monitoring requirements.

1.3. A Non-Technical Summary accompanies this report and Appendices are included in Volume 3.

Previous Appraisals and Assessments

1.4. Stage B of the SEA/SA involved the identification and appraisal of issues and options for achieving the objectives of the LDF. It was conducted in the spring, 2005 and resulted in an analysis of the sustainability strengths and weaknesses of each of the Area Action Plans. Those findings have been carried forward where relevant into the existing appraisal. In addition, more has been written about the emerging policies for the Cities' AAPs in the Preferred Options for the Core Strategy, which is reviewed in a separate document (Volume 2). This has been followed by a review of the policies and proposals contained within the Core Strategy which sets the context to each Area Action Plan. SEA/SA comments on the Core Strategy references to Devonport AAP are repeated below for ease of reference.
SEA/SA Commentary on Devonport AAP in the Core Strategy

Proposals for the Devonport Area Action Plan appear broadly sustainable although, inevitably, some conflict of interest may arise

- Developing a new district centre is positive in terms of providing employment opportunities and revitalising the area, however doubts must exist as to whether or not the jobs created will meet local needs or whether it will encourage further commuting from people living outside the area.

- The release of Mount Wise and associated proposals for open access, recreation, education and sports facilities are positive in that it should serve the local needs of the community.

- The conversion of the market hall for a range of opportunities, and proposals to redevelop and refurbish housing stock will have a positive effect on encouraging a diversity of economic opportunities and skills. However the restoration/refurbishment must be sensitive to the surrounding built environment and reflect/retain locally distinctive features?

- Strong emphasis needs to be given to design principles and construction standards to ensure that the conversion of land and building for a range of different uses including residential results in the reduction of energy consumption and creation of waste.

- Whilst proposals for re-routing heavy traffic will have a positive impact on amenity and address some issues associated with safety the new alignments may simply transfer negative impacts associated with air quality, noise and concerns over safety to large open spaces which are intended to be enhanced for amenity and recreation. In addition, the quality of life for local communities living adjacent to the proposed route could suffer.

- Questions remain over whether or not the measures for reducing crime and prostitution and increasing public safety through sensitive design and the increase of pedestrian and cycling activity will be sufficient to upgrade the area or whether additional/alternative solutions should be explored?

- Whilst proposals to diversify the local economy and explore ways in which to revitalise the area are positive given the loss of jobs in the defence sector and the rise in unemployment it would be wrong to underestimate the amount of work that will be needed to provide the necessary skills and retraining for local people and the need to target this investment at those most in need of advice?
2. APPRAISAL OF THE PREFERRED OPTIONS FOR DEVONPORT AREA ACTION PLAN

Introduction

2.1. This chapter outlines the main findings of the appraisal of the preferred options of Devonport Area Action Plan. In reaching our conclusions, we have drawn on our analysis of the baseline situation, the characteristics of Plymouth and the sustainability issues it faces. In all instances, an explanation for our assessment has been provided, in the matrices set out in Table 2.

Appraisal of the Preferred Options for the AAP

2.2. The appraisal of the Preferred Options for the AAP has been split into two sections; firstly a review has been undertaken of the SA Objectives against the principles of the Area Action Plan and, secondly, a more detailed appraisal of the individual preferred options has been made.

Reviewing the SA Objectives against the Preferred Option Principles

2.3. The SEA/SA of the Preferred Options for Devonport Area Action Plan takes it starting point with a review of the vision and principles see Table 1 below. Overall the vision and principles adhere to the sustainability objectives; however from a brief review there are a number of issues which may potentially generate negative impacts. These include the following points:

- It is important to ensure that in new development proposals an adequate amount/type of open space is retained
- Further details need to be provided in relation to public transport and car parking provision. Will the AAP be seeking to reduce parking provision in residential areas?
- The design and construction of buildings should seek not only to reduce energy consumption but also reduce water consumption, ensure that materials are sourced locally and use secondary materials where possible.
- Proposals should ensure that existing communities are not adversely affected by compulsory purchase orders and that they are not “out priced” of the housing market; this means a range of housing stock and type needs to be made available.
- Proposals should seek to support local employment opportunities during construction and implementation.
| Table 1 Devonport AAP SA Objectives and Principles |
|---------------------------------|---------------------------------|
| **SA Objectives** | **Devonport Principles** |
| BIODIVERSITY – Biodiversity and landscape are properly valued, conserved and enhanced | A population able to sustain local services – making the best use of precious brownfield land, by building to a density sufficient to sustain mixed use development which bring basic amenities within walking distance and supports public transport |
| POLLUTION – Pollution is limited to levels which do not damage natural systems | A highly accessible movement framework – based around an urban structure of interconnected streets, footpaths and cycleways and a high quality public transport network |
| CLIMATE CHANGE – Emissions contributing to climate change are reduced and adaptation measures are in place | Distinctive urban design and architecture – that reflects Devonport’s distinctive character and identity |
| RESOURCES – Demands on natural resources are managed so that they are used as efficiently as possible | A mix of well integrated uses – located within a structure of perimeter blocks that creates a vital and vibrant area and brings amenities, living and working areas closer together |
| ENERGY – Efficient use of energy | A range of high quality homes – which encompasses both a range of tenures, residential and commercial, closely knitted to encourage social and economic cohesion and opportunity, and housing types to suit differing needs provided to a high quality that creates far higher living standards and diversified the socio economic profile of the area |
| WASTE – Waste is minimised and, wherever possible, eliminated | Maximising energy efficiency – optimising the use of energy efficiency and renewable energy applications, water conservation and reuse. New buildings will be encouraged to embrace the principles of sustainable development, in terms of energy efficiency and the use of recycled materials and materials from renewable energy resources |
| ECONOMY – A diverse and thriving economy | A healthy and safe environment providing high quality healthcare and an urban area that is secure by design that has a range of attractive sports, recreational and cultural attractions and which makes the most of Devonport’s waterfront setting and rich heritage |
| WORK AND INCOMES – Everyone has access to satisfying and fairly paid work and unpaid work is valued | Improving education for all – providing a range of high quality facilities offering the potential for lifelong learning |
| LOCAL NEEDS – Wherever possible, local needs are met locally so support local economies | Developing employment opportunities – containing a diversity of jobs, linked to training and skills development |
| HEALTH & WELL-BEING – Promoting everyone’s physical and mental wellbeing | |
| LEARNING – Everyone has access to lifelong learning, training opportunities, skills and knowledge | |
| SAFETY – Everyone is able to live without fear of crime or persecution | |
| DISTINCTIVENESS AND CULTURAL HERITAGE – Diversity and local distinctiveness and cultural heritage are valued, protected and celebrated | |
| LEISURE – Opportunities for culture, leisure and recreation are provided widely | |
| TRANSPORT AND ACCESS – Offering inclusive access to all service, including access for those without a car | |
| BASIC NEEDS, EQUALITY AND DIVERSITY – Ensuring community cohesion, tolerance, understanding and equality of opportunity | |
| DEMOCRACY – All sections of the community are empowered to participate in decision making | |

4
2.4. In order to predict and assess the significance of the preferred options, the probability, duration, frequency and reversibility of the effect were determined. In making the assessment, the following issues were considered:

**Timescale:** Are the potential effects short, medium or long term and are they temporary or permanent?

**Magnitude, scale and likelihood of occurrence:** What is the scale of the effect, minor, moderate or major considering the geographical area and size of population likely to be affected and where it will occur?

**Significance:** Will the effect of the preferred option have a positive, negative, uncertain or neutral effect?

**Cumulative/secondary and synergistic effects:** Are there potential cumulative, secondary and synergistic effects that could arise through implementing development following the policies in the plan?

**Mitigation:** Having assessed the likely range and scale of effects, measures have been defined where possible to suggest how the effect can be avoided through introduction of planning conditions or changes in the way in which each policy is implemented. Measures consider alternatives, the refinement of the policy, additional policies or policy criteria to reduce the impact and/or supplementary planning guidance. Where firm development proposals exist mitigation measures can be more specific than where only a policy direction is defined.
<table>
<thead>
<tr>
<th>Preferred Option</th>
<th>Sustainability Objectives</th>
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<tbody>
<tr>
<td></td>
<td>Biodiversity</td>
</tr>
<tr>
<td>1: South Yard Enclave</td>
<td>1 ? 0</td>
</tr>
<tr>
<td>2: MoD Mount Wise</td>
<td>1 ? 0</td>
</tr>
<tr>
<td>3: The South Yard Heritage Area</td>
<td>1 0 0</td>
</tr>
<tr>
<td>4: Marlborough Street</td>
<td>0 ? 0</td>
</tr>
<tr>
<td>5: Devonport Conservation Area</td>
<td>1 0 0</td>
</tr>
<tr>
<td>6: The &quot;Green&quot; Arc</td>
<td>2 0 0</td>
</tr>
<tr>
<td>7: North of Granby Green</td>
<td>? ? 0</td>
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<tr>
<td>8: The Bull Ring, at Duke St, Monument St, Kerr St and 1001-200 Ker St</td>
<td>? ? 0</td>
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<tr>
<td>9: Devonport Guildhall</td>
<td>2 0 0</td>
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<tr>
<td>11: Transport</td>
<td>1 1/1</td>
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<tr>
<td>12: Redevelopment at Mount St and Ker St</td>
<td>? ? 0</td>
</tr>
<tr>
<td>14: Mount Wise primary school</td>
<td>? ? 0</td>
</tr>
<tr>
<td>15: Marlborough St primary school</td>
<td>? ? 0</td>
</tr>
<tr>
<td>16: Demolition and redevelopment</td>
<td>? ? 0</td>
</tr>
</tbody>
</table>

**Key**

2: Strongly sustainable  
1: Sustainable  
0: No impact  
-1: Unsustainable  
-2: Strongly unsustainable  
? : Uncertain
**Key Findings**

2.5. Below is a brief review of each preferred option (see Table 2 above for a summary of findings).

**Option 1 – South Yard Enclave**

2.6. **Strengths:** The development proposal for this site is a positive opportunity to link communities and provide a focus for the local community in terms of services and facilities respecting local characteristics. The mixed use development offers a diverse range of services and facilities which will turn have a positive effect on local employment opportunities, local needs and enhance communities’ quality of life, overcoming issues associated with high levels of unemployment and health deprivation. It should encourage a more vibrant and varied socio economic profile. The proposal should have a positive impact on reconnecting communities currently severed through improved footpath/cycle routes.

2.7. **Weaknesses:** It is uncertain from the proposal whether the proportion of open space to built development is sufficient and meets Government guidelines. Short term impacts from noise and air pollution will be generated during the construction phase. In addition it is uncertain whether there is contaminated land on site. Apart from considering a reduction in energy consumption it is important that the proposal reflects the overarching principles relating to the conservation water, reuse materials and source materials locally. It is unclear from the proposal what level of parking provision will be made available and the relationship of the development to key public transport routes.

2.8. **Timescale:** Medium to long term (over the next 10-20 years) due to the time taken for development briefs to be prepared, proposals to come forward and construction to occur.

2.9. **Likelihood:** High

2.10. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** A clearly defined development brief needs to reflect the principles referred in the AAP. A detailed assessment will need to be undertaken to determine whether any of the MoD land is contaminated. A full assessment needs to be undertaken of the public transport network.

2.11. Opportunities should be explored to employ the local labour force by incorporating skills/training programmes to improve the skills base and overcome long term unemployment levels,

**Option 2 – MoD Mount Wise**

2.12. **Strength:** MoD Mount Wise has a number of proposals that strongly support sustainability objectives and seeks to protect significant archaeological interest on the site, generate strong visual links to the waterfront and retain formal sports facilities. The proposal seeks to provide a percentage of affordable housing and reduce energy consumption for some housing stock.
2.13. **Weaknesses:** Negative effects are associated with short term impacts on air quality, noise and neighbouring communities' quality of life during construction. Issues which need to be addressed include achieving a high quality of design which whilst enabling public access overcomes concerns over crime levels and anti-social behaviour. In addition the development needs to provide a range of housing stock and types. Opportunities should be explored to encourage a reduction in waste going to landfill through the provision of recycling facilities and water conservation. Where possible materials should be sourced locally, including from on site.

2.14. **Timescale:** Medium to long term (over the next 15-20 years) due to the time taken for a comprehensive development brief to be prepared.

2.15. **Likelihood:** Medium to high.

2.16. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** A clear development brief should be prepared incorporating high quality design and the design and use of sustainable design and construction techniques. It should seek to:

- Encourage the reuse of construction and demolition of waste materials in new development,
- A reduction in water consumption,
- Waste minimisation through recycling.

Opportunities should be explored to employ the local labour force incorporating skills/training programmes to improve the skills base and overcome long term unemployment levels,

**Option 3 – The South Yard Heritage Area**

2.17. **Strengths:** This proposal should have a positive effect on retaining key historical features in a sensitive manner, broadening the accessibility to historic spaces and buildings and maximising the usability of the infrastructure. In addition it should provide local job opportunities and enhance skills through the provision of small workshops and training facilities.

2.18. **Weaknesses:** A sensitive balance needs to be achieved between creating a visitor attraction and maintaining the active use of the dockyard for the navy without compromising the safety of either interest group. The proposal states that benefits will be accrued to the community through commerce. Further work needs to be undertaken to explore how this can be achieved; will it be through the establishment of small cafes and shops or will there be some form of visitor payback mechanism in place to invest in the surrounding infrastructure? Consideration also needs to be given to the capacity for visitor parking within the area, alternative modes of access for visitors to the Heritage Quarter and potential impacts on communities’ quality of life.
2.19. **Timescale:** Medium to long term (over the next 15-20 years) due to the preparation of a development brief, the availability of the site and restoration works.

2.20. **Likelihood:** Medium to high.

2.21. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** The project development team be required to submit a detailed travel plan, covering how visitors will access the site and their mode of transport. Any concerns over conflicts of use relating to visitors and the military should be avoided through use of sensitive design and interpretation.

**Option 4 – Marlborough Street**

2.22. **Strengths:** The proposal to generate a mixed use street will have a positive impact in terms of improving access to services and facilities, making efficient use of existing buildings and infrastructure and generating a greater diversity of employment opportunities covering retail and office use.

2.23. **Weaknesses:** The proposals need to ensure that where appropriate locally distinct features are reflected in any new building/restoration work, improvements are made to existing stock to be suitable for 21st century living and negative impacts associated with noise and air pollution are mitigated during construction. All new development should seek to reduce energy and water consumption and minimise waste generated to landfill. Where possible, construction materials should be sourced locally and include the recycling of materials on site. A potential negative effect could be uncertainty over the viability of specialist retail uses. In addition, it is unclear from the proposal whether car parking will be provided for residential areas, whether this will be on street or elsewhere and whether this will have an impact on traffic movements.

2.24. **Timescale:** Short to medium term (over the next 5-10 years) due to the time taken for negotiations to be completed with landowners and relocations to take place.

2.25. **Likelihood:** Medium.

2.26. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** The impact of changes on specialist uses should be closely monitored to ensure that as a consequence of the changes their economic vitality is maintained.

**Option 5 – Devonport Conservation Area**

2.27. **Strengths:** This proposal will support the archaeological, heritage and landscape integrity of the area.

2.28. **Weaknesses:** None identified

2.29. **Timescale:** Short to medium term (over the next 5-15 years)

2.30. **Likelihood:** Medium to high.
2.31. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** None identified

**Option 6 – The “Green Arc”**

2.32. **Strengths:** Measures to improve and integrate green spaces will have a positive effect on the landscape, enhance people’s sense of well being and promote healthier lifestyles. In addition proposals to improve surveillance, provide cycle links and undertake associated highway safety works will reduce fear of crime and enhance human safety.

2.33. **Weaknesses:** None identified.

2.34. **Timescale:** Medium to long term (over the next 15-20 years).

2.35. **Likelihood:** Medium to high.

2.36. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** None identified

**Option 7 – North of Granby Green**

2.37. **Strengths:** Proposals to demolish and redevelop the area will result in improvements to the quality of housing stock, generate a mix of housing for all, ensure some provision is made for affordable housing, including some that meet lifetime housing standards and supporting the reuse of previously developed land. The proposal should improve connectivity within the housing estate and link to adjacent communities as well as enhancing the public realm and improving people’s quality of life and well being.

2.38. **Weaknesses:** Potential negative impacts could result from the development’s proximity to the A374 with the possible need for noise attenuation, and mitigation against noise and air pollution during construction. In addition, it is uncertain whether the proposal will meet Government guidelines on proximity to greenspace, adequately reduce car parking provision and create the necessary drive for the reuse of construction materials on site. The lower density in housing will result in the displacement of some communities and it is uncertain what provision has been made to accommodate people elsewhere as a temporary measure or to encourage permanent relocation to other parts of the City?

2.39. **Timescale:** Short to medium term (over the next 5-15 years) due to the time taken for negotiations to be completed and relocations to take place.

2.40. **Likelihood:** High

2.41. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** Clear development principles are required, incorporating high quality design and use of sustainable design and construction techniques to accompany development briefs for this area of the city, including:
  - seeking to reduce energy consumption
- design out crime
- encourage the reuse of construction and demolition of waste materials in new development
- the sourcing of local materials
- reduce water consumption
- minimise waste through the provision of recycling facilities
- reduce car parking provision

Option 8 – The Bull Ring, at Duke Street, Monument Street, Kerr Street and 1001-20 Kerr Street

2.42. **Strengths:** Proposals to demolish and redevelop the area will result in improved quality of housing stock, generate a mix of housing for all, ensure provision is made for affordable housing, provide for some dwellings meet lifetime housing standards and support the reuse of previously developed land. The proposal should result in improvements to the public realm, people’s quality of life and well being.

2.43. **Weaknesses:** Potential negative impacts could result from noise and air pollution during construction. In addition it is uncertain whether the proposal will meet Government guidelines on proximity to greenspace, seek to reduce car parking provision and create the necessary drive for the reuse of construction materials on site. The lower density in housing will result in the displacement of some communities and it is uncertain what provision has been made to accommodate people elsewhere as a temporary measure or to encourage permanent relocation to other parts of the City? The proposals should also seek to ensure that existing rights of way are not severed through the proposed development.

2.44. **Timescale:** Short to medium term (over the next 5-15 years) due to the time taken for negotiations to be completed and relocations to take place.

2.45. **Likelihood:** High

2.46. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** Clear development principles are required, incorporating high quality design and use of sustainable design and construction techniques to accompany development briefs for this area of the city, including:

- seeking to reduce energy consumption
- design out crime
- encourage the reuse of construction and demolition of waste materials in new development
- the sourcing of local materials
- reduce water consumption
- minimise waste through the provision of recycling facilities
- reduce car parking provision
- ensure existing rights of way are not severed through development
Option 9 – Devonport Guild Hall

2.47. **Strengths:** This proposal will support local needs, encourage community participation and cohesion, improve access to cultural facilities, enhance the quality of infrastructure and public realm and support opportunities to access learning facilities for all levels.

2.48. **Weaknesses:** It is uncertain from this proposal whether restoration work can seek to reduce energy and water consumption and minimise waste generation.

2.49. **Timescale:** Short to medium term (over the next 5-15 years) due to the time taken for negotiations to be completed with landowners and relocations to take place.

2.50. **Likelihood:** High.

2.51. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** Restoration work on the building should explore opportunities to reduce energy and water consumption.

Option 10 – Richmond Walk

2.52. **Strengths:** Proposals to encourage mixed use development should generate a mix of housing for all, ensure provision is made for affordable housing, provide for some dwellings to meet lifetime housing standards and support the reuse of previously developed land where available. The proposal should result in improvements to the public realm, people’s quality of life and well being.

2.53. **Weaknesses:** Potential negative impacts could result from noise and air pollution during construction. In addition it is uncertain whether the proposal will meet Government guidelines on proximity to greenspace, seek to reduce car parking provision and seek to reuse construction materials on site. Proposals should be sensitive to existing employment land and ensure that any conflict of use is avoided e.g. noise, delivery times etc impacting on residents quality of life. Proposals should seek to ensure that existing rights of way are not severed through the proposed development. There is some level of uncertainty whether new high quality waterfront development will encourage the purchase of dwellings as second homes and drive up house prices in this area. In addition, care needs to be taken to ensure that any development proposals are sensitive to potential risks of flooding resulting from rising sea levels.

2.54. **Timescale:** Short to medium term (over the next 5-15 years) due to the time taken for negotiations to be completed.

2.55. **Likelihood:** High.

2.56. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** Clear development principles are required, incorporating high quality design and use of sustainable design and construction techniques to accompany development briefs for this area of the city, including:

- seeking to reduce energy consumption
- design out crime
- encourage the reuse of construction and demolition of waste materials in new development
- the sourcing of local materials
- reduce water consumption
- minimise waste through the provision of recycling facilities
- reduce car parking provision

**Option 11 - Transport**

2.57. **Strengths:** The proposal is generally compatible with the sustainability objectives in seeking to avoid severance of existing communities by the creation of improved linkages and minimising potential impacts to communities’ health though improvements in air quality to a reduction in the amount of through traffic.

2.58. **Weaknesses:** None identified. It is uncertain whether proposals will be sensitive to achieving a high quality environment and result in improvements to the public realm.

2.59. **Timescale:** Medium to long term (over the next 10-20 years) due to the time take for development briefs to be prepared, proposals to come forward and construction to occur

2.60. **Likelihood:** Medium to high

2.61. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** Future improvements and traffic management measures should seek to improve the quality of the public realm through high quality design.

**Option 12 – Redevelopment of Mount Street and Kerr Street**

2.62. **Strengths:** Proposals to demolish and redevelop the area will result in higher quality housing stock, generate a mix of housing for all, ensure some provision is made for affordable housing, some meeting lifetime housing standards and supporting the reuse of previously developed land. The proposal should result in improvements to the public realm, people’s quality of life and well being.

2.63. **Weaknesses:** Potential negative impacts could result from noise and air pollution during construction. In addition it is uncertain whether the proposal will meet Government guidelines on proximity to greenspace, seek to reduce car parking provision and drive for the reuse of construction materials on site. The lower density in housing will result in the displacement of some communities and it is uncertain what provision has been made to accommodate people elsewhere as a temporary measure or to encourage permanent relocation to other parts of the City? Proposals should seek to ensure that existing rights of way are not severed through the proposed development and new connections to existing communities are created.

2.64. **Timescale:** Short to medium term (over the next 5-15 years) depending on relocations to take place.
2.65. **Likelihood:** High

2.66. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** Clear development principles are required, incorporating high quality design and use of sustainable design and construction techniques to accompany development briefs for this area of the city, including:
- seeking to reduce energy consumption
- design out crime
- encourage the reuse of construction and demolition of waste materials in new development
- the sourcing of local materials
- reduce water consumption
- minimise waste through the provision of recycling facilities
- reduce car parking provision

**Option 13 – Curtis / Duke Street**

2.67. **Strengths:** Proposals to demolish and redevelop the area will result in improvements to the quality of housing stock, generate a mix of housing for all, ensure some provision is made for affordable housing, some meeting lifetime housing standards and supporting the reuse of previously developed land. The proposal should result in improvements to the public realm, people’s quality of life and well being.

2.68. **Weaknesses:** Potential negative impacts could result from noise and air pollution during construction. In addition it is uncertain whether the proposal will meet Government guidelines on proximity to greenspace, seek to reduce car parking provision and drive for the reuse of construction materials on site. The lower density in housing will result in the displacement of some communities and it is uncertain what provision has been made to accommodate people elsewhere as a temporary measure or to encourage permanent relocation to other parts of the City? Proposals should seek to ensure that existing rights of way are not severed through the proposed development and new connections to existing communities are created.

2.69. **Timescale:** Short to medium term (over the next 5-15 years) depending on relocations to take place.

2.70. **Likelihood:** High

2.71. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** Clear development principles are required, incorporating high quality design and use of sustainable design and construction techniques to accompany development briefs for this area of the city, including:
- seeking to reduce energy consumption
- design out crime
- encourage the reuse of construction and demolition of waste materials in new development
• the sourcing of local materials
• reduce water consumption
• minimise waste through the provision of recycling facilities
• reduce car parking provision

**Option 14 – Mount Wise Primary School**

2.72. **Strengths:** Proposals to demolish Mount Wise primary school and redevelop the area will result in improvements to the quality of housing stock, generate a mix of housing for all, ensure some provision is made for affordable housing, some meeting lifetime housing standards and supporting the reuse of previously developed land.

2.73. **Weaknesses:** Potential negative impacts are associated with noise and air pollution during construction. In addition it is uncertain whether the proposal will meet Government guidelines on proximity to greenspace, seek to reduce car parking provision and drive for the reuse of construction materials on site. In addition, it is uncertain whether alternative school provision will be available.

2.74. **Timescale:** Short to medium term (over the next 5-15 years) due to the time taken for negotiations to be completed with landowners and relocations to take place.

2.75. **Likelihood:** High

2.76. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** Clear development principles are required, incorporating high quality design and use of sustainable design and construction techniques to accompany development briefs for this area of the city, including:
• seeking to reduce energy consumption
• design out crime
• encourage the reuse of construction and demolition of waste materials in new development
• the sourcing of local materials
• reduce water consumption
• minimise waste through the provision of recycling facilities
• reduce car parking provision

**Option 15 – Marlborough Primary School**

2.77. **Strengths:** Proposals to demolish Marlborough primary school and redevelop the area will result in improvements to the quality of housing stock, generate a mix of housing for all, ensure that there is some provision made for affordable housing, and some meeting lifetime housing standards as well as supporting the reuse of previously developed land.

2.78. **Weaknesses:** Potential negative impacts are associated with noise and air pollution during construction. In addition it is uncertain whether the proposal will meet Government guidelines on proximity to greenspace, seek to reduce car parking provision and drive for the reuse of construction materials on site. In addition, it is uncertain whether alternative school provision will be available.
2.79. **Timescale:** Short to medium term (over the next 5-15 years) due to the time taken for negotiations to be completed with landowners and relocations to take place.

2.80. **Likelihood:** High

2.81. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** Clear development principles are required, incorporating high quality design and use of sustainable design and construction techniques to accompany development briefs for this area of the city, including:
   - seeking to reduce energy consumption
   - design out crime
   - encourage the reuse of construction and demolition of waste materials in new development
   - the sourcing of local materials
   - reduce water consumption
   - minimise waste through the provision of recycling facilities
   - reduce car parking provision

**Option 16 – Redevelopment between Marlborough Primary School, Morice Street and Albay Street**

2.82. **Strengths:** Proposals to demolish and redevelop the area will result in improvements to the quality of housing stock, generate a mix of housing for all, ensure some provision is made for affordable housing, some meeting lifetime housing standards and supporting the reuse of previously developed land. The proposal should result in improvements to the public realm, people’s quality of life and well being.

2.83. **Weaknesses:** Potential negative impacts could result from noise and air pollution during construction. In addition it is uncertain whether the proposal will meet Government guidelines on proximity to greenspace, seek to reduce car parking provision and drive for the reuse of construction materials on site. The lower density in housing will result in the displacement of some communities and it is uncertain what provision has been made to accommodate people elsewhere as a temporary measure or to encourage permanent relocation to other parts of the City? Proposals should seek to ensure that existing rights of way are not severed through the proposed development and new connections are created to link to adjacent communities.

2.84. **Timescale:** Short to medium term (over the next 5-15 years) due to the time taken for negotiations to be completed with landowners and relocations to take place.

2.85. **Likelihood:** High

2.86. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** Clear development principles are required, incorporating high quality design and use of sustainable design and construction techniques to accompany development briefs for this area of the city, including:
   - seeking to reduce energy consumption
• design out crime
• encourage the reuse of construction and demolition of waste materials in new development
• the sourcing of local materials
• reduce water consumption
• minimise waste through the provision of recycling facilities
• reduce car parking provision

Conclusions and Recommendations

2.87. 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).

2.88. Like other Area Action Plans, Devonport will be reliant on future investment, land negotiations and compulsory purchase orders. Care needs to be taken to ensure that throughout the phasing of development adequate facilities and services are available to meet the needs of the new community and conflicts with adjacent land uses are minimised. Examples of where potential conflicts may occur include; South Yard Heritage Centre (which it is hoped will be a major draw for visitors) and the site’s continuing use by the MoD (Option 3); issues relating to safety, health and security will be paramount.

2.89. Development proposals are heavily reliant on the success of the new public transport system and it is critical that the infrastructure is in place and functioning. It is uncertain from proposals whether major development proposals will lie in close proximity to public transport routes and whether car parking provision for residential and employment land will be reduced. Particular care needs to be taken to ensure that visitor facilities for South Yard Heritage Area (Option 3) are adequate, link into the public transport network and do not infringe on adjacent communities.

2.90. Although residential development proposals refer to the need to reduce energy consumption, proposals could do more to adhere to sustainable design and construction principles. In addition, consideration should be given to creating and enhancing connections between new development and existing communities.

2.91. In considering new development proposals relating the loss of existing primary schools for residential use, care needs to be taken to ensure that adequate educational facilities are provided and residential properties lie within an easy walk to school.

2.92. Potential negative issues which are highlighted throughout the review relate to the impact of developments on existing sites of nature conservation, landscape, heritage or archaeological importance. It is important to ensure that with an increase or change in population and density, impacts are mitigated. New proposals must ensure that adequate measures are taken to meet minimum standards for open space provision and sports facilities in accordance with Government guidelines. Will Green Arc (Option 6) meet the needs of the local community and how will the future
provision of green space be monitored to ensure that not all development merely makes a contribution to off site provision. The AAP must also consider the visual impact of development proposals, particularly in relation to the waterfront.

2.93. Care needs to be taken in redeveloping MoD land to ensure that adequate remediation measures are taken if land is to be developed for housing. The siting of development proposals adjacent to the River Tamar needs to respond to risks of flooding.

2.94. The structure of existing communities and potential changes to surrounding communities needs to be careful considered. The proposals raise a number of basic questions:

- Will new residential development result in migration?
- Will a significant number of houses be purchased as second homes (especially along waterfront locations)?
- Will targets for affordable housing be achieved and should targets be more ambitious?
- What will be the future demographic make up of the new residential areas be like? Will it result in a predominately middle aged or retired population?
- Many of the proposals seek to reduce housing density; where will existing communities be relocated to and will they be forced to move out of the area?

2.95. The issue of demographics naturally leads on to considering how local employment opportunities will be supported. Issues worth considering at this stage are:

- Will people living in the new development areas actually work there, or will there be a significant level of in-migration on a daily basis from elsewhere in the City?
- Will the development result an increase in in-migration from outside the City?
- Will the creation of an attractive high quality environment result in the displacement of existing businesses from elsewhere and what is the consequential effect on local employees?

2.96. Focusing on the tourism potential for the area, opportunities should be explored to reap the benefits accrued from the South Yard Heritage Area for the local community, exploring opportunities for visitor payback and community participation.

2.97. We recognise that the LDF will find it difficult to address many of the issues raised due to their uncertain nature. However, what the LDF can do is be instrumental in asking some of these questions and challenging developers. In an ideal world the LDF should push for proposals to be more ambitious in meeting sustainability objectives. This could be an exciting opportunity to put sustainable development into practice, remembering that no proposal can be considered in isolation.

**Recommendations:**

2.98. The following recommendations are suggested ways of improving the AAP and its relationship with the Core Strategy:
• Each development proposals and Area Action Plan should not be considered in isolation.

• The LDF needs to recognise that depending on the timing of proposals, implementation and funding streams impacts may occur on adjacent land uses which need to be mitigated.

• Throughout the phasing of development, it is important to ensure that the community functions sustainability with adequate services, facilities and infrastructure to meet all needs.

• Alongside the open space audit, consideration should be given to the loss of open space and the availability of open space carefully monitored to ensure that provision accords with Government guidelines in PPG17.

• The Area Action Plan would benefit from more text describing the context of the proposals.

• In line with PPG25, flood risk will need to be assessed when deciding on specific locations for development, and Plymouth City Council should work with the Environment Agency to undertake a Strategic Flood Risk Assessment for the City, which could be drawn upon when assessing development proposals.

• Public transport infrastructure needs to be in place well in advance of new development occurring. It is important not only to influence this modal shift through residential development (i.e. minimising car parking provision) but also through major employers. All new large scale businesses should be required to submit green travel plans and commit some level of contribution /investment where development is not adjacent to the bus network to improve footpath and cycle route links.

• A strong link needs to be made between the Core Strategy Preferred Options and Area Action Plans particular in relation to design principles.

• A Design Guide should be produced for all development on the re-use of construction and demolition materials on site, e.g. through planning conditions requiring developers to provide a demolition plan and cover efficient water and energy use, reuse and sourcing of local materials. Design proposals should consider opportunities to support renewable energy and sustainable urban drainage schemes. This commitment should include both residential dwellings and large businesses through environmental management policies.

• A detailed risks assessment needs to accompany any redevelopment proposals relating to MoD land and other land likely to have resulted in land contamination. Where potential conflicts could occur from adjacent land uses, care needs to be taken to ensure that issues relating to health, safety and security can be addressed.
3. **MONITORING FRAMEWORK**

3.1. The SEA Directive requires that the significant environmental effects of implementing a plan or programme should be monitored in order to, inter alia, identify at an early stage any unforeseen adverse effects, and to be able to undertake appropriate remedial action. SA monitoring will cover the significant sustainability effects as well as the environmental effects.

3.2. Only a limited number of significant effects have been identified or predicted through the appraisal of the Core Strategy and Area Action Plans although there are a number of significant risks to be considered. These include:

- Development in flood risk areas,
- Over-pricing of property in district centres and desirable locations like the waterside which could price out existing local residents.

3.3. It is recommended that Plymouth City Council follow the comprehensive guidance set out in Annex 11 of the ODPM SA guidance, which suggests how local planning authorities should develop an SA monitoring framework, building on existing monitoring systems such as the Annual Monitoring Reports for the LDF. The SA guidance also notes that SA monitoring could be “authority-wide”, i.e. the same information collected through the monitoring system could be used to monitor the effects of several plans within the authority.

3.4. SA monitoring should involve measuring indicators which enable a causal link to be established between implementation of the LDF and the likely significant effect being monitored. Potential indicators have been proposed in the Scoping Report for each of the SA/SEA sub-objectives, drawing from existing sources of indicators in order to ensure recording of data for the indicator is already established (at the District, Regional or National level). These indicators should be used as a basis for developing the SA monitoring framework.

3.5. As stated in the SA guidance, information used in monitoring will in many cases be provided by outside bodies. This has already been evidenced by the additional baseline information provided by the statutory environmental consultees during consultation on the Scoping Report for this SA/SEA. It is therefore recommended that Plymouth City Council should continue the dialogue with statutory environmental consultees and other stakeholders commenced as part of the SA/SEA process, and work with them to establish the relevant sustainability effects to be monitored and to obtain information that is appropriate, up to date and reliable.

3.6. The dialogue and monitoring process could best be achieved through the establishment of an SA/SEA steering group either within the District, at the County level, or perhaps by making use of the existing steering group created for the Strategic Sustainability Assessment of the South West Regional Spatial Strategy, which meets regularly and includes representatives of the statutory environmental bodies,
the Regional Development Agency, the Regional Assembly, local authorities and other social and environmental organisations.

<table>
<thead>
<tr>
<th>Suggested monitoring regime for the Plymouth SEAs</th>
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<tr>
<td>• Determination of the scope of monitoring;</td>
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<tr>
<td>• Identification of the necessary information;</td>
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<td>• Identification of existing sources of information;</td>
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<tr>
<td>o Data at project level;</td>
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<tr>
<td>o General environmental monitoring;</td>
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<tr>
<td>o Other data;</td>
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<tr>
<td>• Filling the gaps;</td>
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<tr>
<td>• Procedural integration of monitoring into the planning system;</td>
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<tr>
<td>• Taking remedial action.</td>
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*European Commission (2003)*

3.7. Ideally, the monitoring arrangements required for ensuring the delivery of sustainability objectives will be built into routine annual monitoring programmes for ensuring that all other aspects of the plan are on course.