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Emerging strategy for Plymouth Airport

COMMUNITY HEALTH, SAFETY, WELL BEING & SOCIAL INCLUSION

Evolution of the Core Strategy:

PLANNING OBLIGATIONS

Section 106 Obligations: Revisions to the SEA/SA

Monitoring Framework
1. STATUS OF THE REPORT

1.1. This report (Volume 2 revised July 2006) concludes Stage C of the Plymouth LDF sustainability appraisal (SA) and strategic environmental assessment (SEA). It constitutes the Draft SEA Environmental Report and SA of the Submission Draft of the Core Strategy of Plymouth City Council’s Local Development Framework. The original version of Volume 2 and Volume 1 comprising the SEA/SA Context Report were published in July 2005, with revisions to cover amendments to the Core Strategy Preferred Options being published in April 2006.

1.2. In addition to the review of revised preferred options for the core strategy this report contains a reference to future monitoring requirements.

1.3. A Non Technical Summary is provided with this report.

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, firstly into the Preferred Options (July 2005), then into the Key Revisions (April 2006) and finally into this appraisal. They are reproduced in Volume 3, Appendix 2 for ease of reference.

The Current Report

1.5. This document sums up the comments that have been made throughout the SEA/SA process on the sustainability and potential social, environmental and economic impacts that could result from the strategies, plans, objectives, policies, targets and proposals contained in the Submission Draft of the Core Strategy. The SEA/SA process has run concurrently with plan-making and the authors of the local development framework have carefully considered the observations and recommendations of the SEA team in revising successive drafts of the Core Strategy. The current report has itself been through a two stage process, involving commentary on a preliminary officers’ draft and then revisions to take account of the final wording approved by Plymouth City Council in the July 24, 2006 document.

1.6. As a result of this close collaboration, the overall sustainability of the planning proposals has been enhanced. However, tensions inevitably remain between some competing objectives of the strategy and so this Draft SEA/SA report still contains a number of cautionary remarks and recommendations. It is also important to recognise that plan-making is only part of the story, and the most crucial stage in delivering the vision for Plymouth is only just beginning – that of implementation.

The Next Steps

1.7. The SEA/SA and Submission Draft of the Core Strategy will be delivered to the Government Office for the South West and to the Planning Inspectorate and will be
published. Any objections from the public and stakeholders that are raised on the grounds of soundness may be considered at a public examination conducted by an independent planning inspector. The inspector will then prepare a report of findings which are binding on Plymouth City Council. The Council will subsequently adopt the Core Strategy with any revisions or amendments specified by the Inspector.

**Method of Approach in updating the SEA/SA**

1.8. The approach which has been adopted in this part of the SEA/SA has been to:

1) Consider the previous findings of the SEA/SA relating to the Preferred Options (July 2005) and Revisions to Preferred Options (April 2006),

2) Note the response of Plymouth City Council and other bodies and individuals to those SEA/SA findings /recommendations,

3) Examine the changes made in the Draft Submission, and,

4) Assess the nature of those changes and their likely environmental, social and economic impacts.

5) Make recommendations on actions that may be appropriate to achieve further improvements in sustainability.

6) Provide a final commentary about the extent to which the revisions have enhanced or prejudiced the sustainability of the overall Core Strategy.

**Presentation of Revised Information**

1.9. This report concentrates on the sustainability and the potential environmental impacts of policies, plans and proposals as they are set out in the Submission Draft. Where this assessment differs from comments that were made in earlier SEA/SA reports (covering the June 2005 Preferred Options, and April 2006 Key Revisions to the Preferred Options) the changes are highlighted by quoting original SEA/SA text. In order to clarify which version of the SEA/SA is being quoted, text from the June 2005 SEA/SA is shown in a box in italics while text from the April and July 2006 SEA/SAs are shown in a shaded box with standard text.

1.10. The order of presentation of some of the material in the Core Strategy has altered in successive drafts of the documents so for the purposes of this report all references to earlier reports have been assigned to the most relevant section of the current Submission Draft.
2. APPRAISAL OF THE CORE STRATEGY

Introduction

2.1. This volume outlines the background to the Core Strategy and the main findings of the appraisal within it undertaken by the SEA/SA assessment team at Land Use Consultants. Our appraisal is inevitably based on a number of subjective judgements (which are summarised below). In reaching our conclusions, we have drawn on our analysis of the baseline situation, the characteristics of Plymouth and the sustainability issues it faces. Detailed findings are included in Volume 3, Appendix 3.

Assumptions and factors taken into account during the SA/SEA

2.2. As noted above, the SA/SEA inevitably relies on an element of subjective judgement and predictions about how people’s patterns of behaviour will change as a result of development, and how the development itself will be implemented. The following general assumptions and factors have been taken into account when appraising the various components of the Plymouth Core Strategy:

- Whilst development focused on previously developed land will place pressure on habitats and landscape near those areas, it could offer opportunities for investing in environmental improvements such as the creation of high quality and wildlife-rich open spaces.

- The effects on travel patterns are difficult to determine, since this depends on a wide range of factors many of which are outside the remit of the planning system. Of these factors, perhaps the most significant influence is the cost of fuel, although the ease of driving from ‘A’ to ‘B’ is another.

Risks/Health Warnings

2.3. There are a number of risks associated with the above assumptions. For instance in order to achieve all of the development that will be required in the LDF, some of the high quality, sustainable design or environmental protection criteria may not be realised. Alternatively, if priority is placed on meeting the environmental protection and design criteria the LDF may not be able to implement the development the City Council has identified as being necessary to meet their social and economic objectives.

2.4. Opportunities to offset these impacts with positive actions elsewhere in the City or in neighbouring authorities have been recognised by the City Council as a mechanism to balance environmental, social and economic impacts and an obvious example is Sherford new development, in South Hams. Sherford is expected to take 4,500 dwellings and 80 ha of employment land of growth required to meet the anticipated needs of Plymouth to 2016.
2.5. Plymouth and South Ham’s action concurs with the Strategic Sustainability Assessment (SSA) Scoping Report for the South West RSS\(^1\) which discusses the role of 'strategic substitution' of benefits as a valuable way to reconcile potentially conflicting objectives in a plan. The report gives examples of how many negative impacts of development could be offset by positive actions if they provide the same benefits (e.g. loss of access to recreational open space could in principle be substituted by opening up another area for recreational use provided it was equally accessible to the people who lost out, and was at least as suitable for their recreational uses).

**Appropriate Assessment**

2.6. This SA/SEA has considered the requirements of the 'Habitats' Directive, 92/43/EEC on the Conservation of Natural Habitats and Wild Flora and Fauna in terms of the possible need for appropriate assessment of the potential effects of the Plymouth Local Development Framework on the Plymouth Sound and Estuaries Marine Site.

Article 6(3) of the Habitats Directive states:

> Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site’s conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject of the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.

Article 6(4) states:

> If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of social or economic nature, the Member State shall take all compensatory measures necessary to ensure that the overall coherence of Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted.

2.7. The Department for Environment, Food and Rural Affairs has published draft amendments to the Conservation (Natural Habitats, &c) Regulations 1994) in May 2006, and these are due to be ratified as part of English Law in September 2006. In the meantime local authorities are advised by the Department for Communities and Local Government (DCLG) to start applying appropriate assessment for relevant plans with immediate effect.

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\(^1\) *Strategic Sustainability Assessment of the South West Regional Spatial Strategy. Stage 1 Scoping Revised Report for Consultation.* Prepared for South West Regional Assembly by Land Use Consultants, Collingwood Environmental Planning and Levett-Therivel Sustainability Consultants. 25 August 2004.
2.8. As part of this SA/SEA, a preliminary review of key environmental issues raised in connection with the Local Development Framework has been undertaken to anticipate whether any of these could have significant adverse impacts on the marine environment. Areas of potential concern are shown by a ✓ in the final column of Table 1.

Table 1 Operations that may impact on sensitive sites

<table>
<thead>
<tr>
<th>Type of Impact</th>
<th>Mechanism</th>
<th>Example of operations</th>
<th>Potential effects from LDF</th>
</tr>
</thead>
<tbody>
<tr>
<td>Physical loss</td>
<td>Removal</td>
<td>Land claim</td>
<td>✓</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Coastal development</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Smothering</td>
<td>Artificial structures, disposal of dredgings, marine littering</td>
<td></td>
</tr>
<tr>
<td>Physical damage</td>
<td>Siltation</td>
<td>River run-off, Outfalls, Channel dredging</td>
<td>✓</td>
</tr>
<tr>
<td></td>
<td>Abrasion</td>
<td>Boating, anchoring trampling</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Selective Removal</td>
<td>Aggregate dredging fishing bait collection</td>
<td></td>
</tr>
<tr>
<td>Non-physical disturbance</td>
<td>Noise</td>
<td>Power boating</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Visual presence</td>
<td>Recreational activities</td>
<td>✓</td>
</tr>
<tr>
<td>Toxic contamination</td>
<td>Introduction of synthetic compounds (e.g. pesticides, TBT, PBCs, endocrine disruptors)</td>
<td>Agricultural runoff, Sewage outfalls, Industrial outfalls</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Introduction of non-synthetic compounds (e.g. heavy metals, hydrocarbons)</td>
<td>Shipping operations/ accidents, Offshore oil and gas, Industrial outfalls</td>
<td>✓</td>
</tr>
<tr>
<td></td>
<td>Introduction of radionuclides</td>
<td>Nuclear power generation</td>
<td></td>
</tr>
<tr>
<td>Non-toxic contamination</td>
<td>Nutrient enrichment</td>
<td>Agricultural runoff, sewage outfalls, industrial outfalls</td>
<td>✓</td>
</tr>
<tr>
<td></td>
<td>Organic enrichment</td>
<td>Mariculture outfalls</td>
<td>✓</td>
</tr>
</tbody>
</table>


2.9. At the overall level of the spatial decisions being taken in the Core Strategy it is thought unlikely that significant environmental effects would occur on the Natura 2000 sites, but individual components of work on infrastructure, including flood
protection, drainage and waste management could have the potential to impact adversely on parts of the Plymouth Sound and Estuaries European Marine Site. This suggests that closer examination, including use of environmental impact assessment (EIA) where appropriate at the design stage, will be necessary for those Area Action Plans where major infrastructure work is planned abutting (or draining directly to) the Natura 2000 site.
3. **APPRaisal OF THE SUBMISSION DRAFT**

**INTRODUCTION**

3.1. The following paragraphs provide a summary of the findings of the SA/SEA. The overall conclusions and recommendations are set out at the end of this section. It should be noted that due to the holistic nature of some of the preferred options and the tight timescale in which they have been produced only a limited analysis could be undertaken.

**A PLAN FOR PLYMOUTH**

**Evolution of the Core Strategy**

3.2. Further work has been undertaken by the City Council on growth levels over the plan period of 2006 to 2026 and comparisons are made between the Plymouth Housing Market Area and surrounding districts. This has resulted in the merging of some of the preferred options under this section and elaboration of some points of detail.

3.3. The view was taken in the early stages of the SEA/SA (June 2005) that a fail safe option should be considered, see quotation 1).

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**SEA/SA June 2005 – Quotation 1**

Whilst all three Preferred Options relating to the planning policy context are supportive of sustainable development principles, it is uncertain how realistic higher rates of growth are and whether they are too ambitious. The SEA/SA review questions whether there needs to be some “fail safe” option in case targets are not achieved responding to an unexpected slow down or, conversely, an option for dealing with the additional pressures that would arise if the increase in growth is above that which has been anticipated in any given timescale.

ProposalS need to ensure that the LDF is flexible enough to respond to changes in levels of growth, progress is monitored and necessary action is taken.

---

3.4. The Submission Draft Core Strategy expands on some of the preferred options in the June 2005 document and sets the planning policy context for the City. It provides further detail on the level of provision to be made in Plymouth between 2006 and 2021 with estimates for low and high growth ranges in 2011, 2012 and 2016. It includes:

- the level of economic activity achievable in the area,
- the number of jobs created,
- total population and population change, and
- housing levels required to support the appropriate level of economic activity.

3.5. The Submission Draft of the Core Strategy incorporates elements of Preferred Option 1, 2, 3 and 7 from the June 2005 report under Strategic Objective 1.
Strategic Objective 1 sets the context of Government’s aspirations for delivering “Urban Renaissance” and “Sustainable Communities,” and details the need in Plymouth to accelerate and accommodate levels of growth between 2001 and 2026. It also discusses potential population size and recognises the need to promote an overall planned pattern of development and constraint.

SA/SEA Findings

3.6. The SA/SEA, June 2005 stated that although the Core Strategy generally strives to meet the range of sustainability objectives identified during the SA/SEA, there are tensions between the SA/SEA objectives when trying to provide sufficient land and infrastructure for necessary future development within the tight confines of the City.

3.7. Although the Submission Draft responds to concerns over tensions and the need to recognise different levels of growth over the timeframe of the plan some uncertainty remains over two clauses under this Objective, in relation to employment land. Whilst Clause 3 seeks to “accommodate the Devon Structure Plan 2001-16 level of growth”, Clause 4 states that the strategy will “make provision for the period 2006-21, by allowing for the longer term higher growth levels of the emerging Regional Spatial Strategy, in a way that supports the City’s urban renaissance programme.” The identified allocation for employment land differs between the Devon Structure Plan and the RSS. The Devon Structure Plan anticipates providing over the period 2001 to 2016 160 hectares of employment land, whereas the RSS seeks to allocate 150 hectares of employment land over the period 2006-2026.

3.8. It is clear from the economic case set out in the submission draft of the Core Strategy that a lower level of employment land provision is justified since Plymouth will rely in future much more on knowledge-based industries that have lower land requirements than traditional engineering and manufacturing uses, but it would be helpful if this were clarified in the policy objectives.

THE CITY VISION

Evolution of the Core Strategy

3.9. The Submission Draft of the Core Strategy expands on the June 2005 document and merges Preferred Option 4 and 5 under Strategic Objective 2. It states that the key objectives of the Vision are to:

- Improve health and well being
- Develop a prosperous economy
- Promote community safety
- Raise educational achievement
- Develop an effective transport system
- Promote inclusive communities
- Maintain a clean and sustainable environment
- Stimulate culture and leisure activities

3.10. To support these objectives, the vision builds on the MBM vision for Plymouth. By 2021 it seeks to
• retain and enhance Plymouth’s sense of place and repair the urban fabric;
• focus growth towards six growth sectors and ensure that there is an appropriate range, mix and quality of employment sites;
• capitalise on higher education, research and development supporting the University and further/higher education sector;
• create a regional; shopping and entertainment centre in the City Centre with a new and complimentary centre at Derriford;
• support all district and local shopping centres and meet deficiencies;
• achieve a high quality public transport network linking the new community of Sherford with the City Centre, Langage employment area and northern Plymouth;
• extend the reach and quality of supporting transport networks including integrated bus services, enhanced strategic cycle routes and improved pedestrian links;
• consolidate entertainment, culture and leisure roles through, for example, the Life Centre in Central Park, new parks and a new creative quarter; and

3.11. The document stresses that in order to deliver the vision, the application of the “plan, monitor and manage approach” is essential especially if the city is to grow to a population of over 300,000.

SA/SEA Findings

3.12. The City Vision and Preferred Spatial Vision is designed to create a thriving city, with a buoyant economy, a diverse range of employment opportunities, sufficient housing provision and services and facilities to meet the needs of all sectors of the community. This may be easier to achieve in growth zones like the City Centre and Derriford than in some of the more deprived areas of the City. Given the high growth targets it is apparent that some development will occur within flood risks areas (which poses some long-term challenges, although the plan contains proposals for handling these within the plan period). It may also be difficult to achieve equality throughout the city, to avoid impacts on nature conservation, landscape, archaeology and heritage and to avoid placing pressure on existing utilities and associated infrastructure.

3.13. This conclusion emphasises the need for the planning and development process to be kept under constant review by the City Council and for appropriate mitigation measures to be introduced to minimise disruption and maintain quality of life standards especially in the older areas of the city which are most in need of renewal.

3.14. The Submission Draft of the Core Strategy encourages the development of tall buildings where appropriate in accordance with the Draft Tall Buildings Strategy (2005) in Strategic Objective 4; Policies CS02 and CS29; and Area Visions 2, 3 and 5. Chapter 4, delivering the quality city, states that development should deliver good urban design and high quality architecture. However, consideration should be given to the potential social and micro-climatic implications of such development through individual assessments.

3.15. The Submission Draft of the Core Strategy takes a pragmatic view of growth opportunities, presenting two different growth options under a Plan for Plymouth. It
responds to the SEA/SA concerns, highlighted above, by emphasising the need to monitor and manage planning responding amongst other influences to fluctuations in the economy.

**Plymouth Council’s Comments on the SEA/SA**

The council seeks to deal with the issue of flooding through Strategic Objectives 11 and 8, and Policy CS21 which address the issue of managing flood risk in a sequential way, in accordance with the Flood Risk Assessment.

NB: While the Response to the SEA Comments shows that Plymouth have taken flood risk into consideration, the SEA suggests that the measures indicated above will not significantly change the risk of flooding mentioned above associated with high growth targets within the city. While sequential development in accordance with the Strategic Flood Risk Assessment is likely to prevent flooding over the life of the Plan, (SO8) there are still longer term implications of development associated with climate change. In addition, Policy CS21 relates to the development of waterfront areas, which could be at high risk of flooding, rather than managing flood risk in general.

**BUILDING SUSTAINABLE LINKED NEIGHBOURHOODS**

**Evolution of the Core Strategy**

3.16. The Submission Draft of the Core Strategy expands on the Preferred Options concepts for sustainable communities and provides a reasoned justification for the need to improve some neighbourhoods based on a number of studies recently commissioned by the City Council which review the role of local centres. These studies will assess the City’s 43 neighbourhoods, planning issues and options; in effect providing an initial health check which alongside other sites will inform planning decisions. The Submission Draft of the Core Strategy has transferred the key LDF objectives and Preferred Option 25 in the June 2005 document under the heading of Strategic Objective 3 and Policy CS01 respectively.

3.17. The SEA/SA (June 2005) highlighted that there were a number of uncertainties associated with the relationship of new development to existing communities. The findings from the review and subsequent assessment in April 2006 are outlined in the box below.

**SA/SEA Findings**

3.18. **Building Sustainable Linked Neighbourhoods:** The proposal is supportive of sustainability objectives; creating sustainable districts and local neighbourhoods where people can both live and work, instilling investor confidence, reducing the need to travel elsewhere for services and facilities and improving the quality of the infrastructure. Whilst there are no negative effects, there are a number of uncertainties associated with how new residential development will link in with existing communities, whether the demographic profile will alter and how future increases in population over and above figures identified in the LDF will be achieved.
3.19. In reviewing development proposals, the cumulative impacts need to be monitored and carrying capacity of specific areas determined to ensure quality of life in existing local communities is unaffected and the demographic makeup is not altered unfavourably. A specific issue that has been identified in the Submission Draft is the emerging shortage of accommodation to meet affordable housing needs. This is likely to make the task of neighbourhood renewal more difficult.

3.20. Although no subsequent changes have been made in the Submission Draft of the Core Strategy to address the SEA/SA findings, it is assumed that such issues relating to the impact of development on the make up of existing communities and cumulative effects will be monitored and managed over the timescale of the plan period.

**Building Sustainable Linked Neighbourhoods:**

**Revisions to the SEA/SA April 2006**

a) *Plymouth City Council Comment:*

Uncertainties associated with altering the demographic profile and how future increases in profile will be achieved are addressed in Strategic Objective 3 and Policy CS01 - Development of Sustainable Linked Communities:

“Where existing communities are altered it will be to improve them in order to create more sustainable communities. In terms of growth estimates, a high and low range is provided in Chapter 1 Table 2, with an assumption that the outcome is likely to be somewhere in between (para.1.27)”.

Development proposals will be managed through a Plan, Monitor, and Manage approach in accordance with Strategic Objective 3 and Policy CS07 Plymouth Retail Hierarchy.

b) *Nature of Revisions*

The supporting text to the Section has added “social exclusion” to the list of elements that the council considers essential to sustainable linked communities.

New Target

“All residential parts of the city to have easy access to local shopping and community facilities by 2026 (to be measured through sustainable neighbourhood assessments)”.

c) *Revised SEA/SA Assessment*

The promotion of inclusiveness and accessibility within community planning are essential elements in building sustainable communities; therefore revisions to the Core Strategy are likely to have a positive impact in this regard.
DELIVERING THE QUALITY CITY

Evolution of the Core Strategy

3.21. This section has been revised substantially since the June 2005 document to include Strategic Objective 4 which reiterates the key objectives for the LDF outlined in June 2005 document plus two specific policies. The first, Policy CS02 relates to the strategic design objectives, whilst the second, Policy CS03 specifically seeks to safeguard and enhance the historic environment.

3.22. The Submission Draft of the Core Strategy sets the context for achieving high quality in design referring to guidance by CABE and English Heritage, the City’s historic evolution and recent design initiatives. The latter has sought to inform the delivery of a quality city through the establishment of urban visioning conferences and a vision for Plymouth, the establishment of a Plymouth Design Panel to provide design advice and a refocused aware scheme which recognises quality new design and historic regeneration. This section also now includes targets based on anecdotal evidence. These include:

- The completion of characterisation studies for the following areas as part of the evidence base for the following Area Action Plans: Devonport, Millbay/Stonehouse, Hoe, City Centre / University, Sutton Harbour and East End.
- The removal of 5 per cent of buildings (approximately 21 properties per annum based on current number of buildings on the list) from the 2006 Buildings At Risk Register per annum by virtue of their future being secured.
- The completion of at least 4 Plymouth Design Panel meetings every year to consider major proposals and strategic design related strategies.

SA/SEA Findings

3.23. Delivering Quality: Achieving a high quality environment for the City is vital in order to attract inward investment and encourage people to both live and work within the City. Positive effects generated from this proposal relate to improvements in the public realm, building and infrastructure, improvements in health, well being and quality of life and crime reduction. In addition, the creation of a high quality environment will instil confidence in businesses to invest and could encourage the retention of workers.

3.24. Whilst these proposals are not assessed as having any significant negative effects there are uncertainties associated with what effect proposals will have in conserving and enhancing nature conservation interest, the siting of development in areas vulnerable to flooding and ensuring that good design adheres to sustainable principles.

3.25. Given the high level of predicted growth, proposals in the LDF need to take radical steps to reduce the consumption of primary resources, through:

- Waste minimisation,
- Reduction in energy and water consumption,
• The reuse of construction and demolition waste materials in new development/infrastructure works and thus the use of primary minerals and aggregates,
• Sourcing of local materials to reduce vehicle trips,
• Encouraging the use of renewable energy sources and sustainable urban drainage.

**Plymouth City Council Response:**

The council aims to address flooding issues in Strategic Objectives 11 and 4, and through implementing the recommendations of the Strategic Flood Risk Assessment.

The council aims to reduce the consumption of natural resources through Strategic Objective 11, Policy CS20 Resource Use and Strategic Objective 12 - Delivering Future Mineral Resources.

3.26. The Submission Draft of the Core Strategy states clearly that detailed guidance on achieving a quality city will be set out in a separate Design Strategy SPD. It is therefore assumed that the concerns raised from the SA/SEA of June 2005 will be addressed through this document and the establishment of the Plymouth Design Panel referred to above. The expansion of Policy CS02 and CS03, from June 2005 version of preferred options 8 and 9 both support the creation of a high quality environment.

**AREA VISIONS AND STRATEGIES**

**Evolution of the Core Strategy**

3.27. A set of Area Visions and Strategies are presented for nine priority areas within the City. Each of these areas will be developed into individual Area Action Plans.

• Devonport
• Millbay and Stonehouse
• The City Centre and University
• The Hoe
• Sutton Harbour
• East End
• Central Park
• North Plymstock
• Derriford & Seaton

3.28. A brief summary of where changes have been made to each of the area visions and strategies is summarised below:

3.29. **Devonport:** Further work has been undertaken to expand on this section, setting the context, identifying the key issues, objectives for the area vision and describing where the emphasis of development should lie. Devonport in particular suffers from poor housing conditions, poor environment, poor health, a lack of choice in housing, high unemployment and crime rates stemming from recent substantial job losses in
the defence sector and a predominance of social housing replacing private housing following heavy bombing during World War 2.

3.30. The Submission Draft Area Vision has been improved since the June 2005 edition, (preferred option 26) by including objectives relating to improvements to the:

- range, quality and choice of housing;
- local employment opportunities;
- range of local services and facilities;
- connectivity through the community;
- protection of natural and historic assets;
- high quality development which is safe and appropriate in the context of Devonport’s heritage.

3.31. **Millbay and Stonehouse:** This section has been developed since the June 2005 document extending the context and describing some of the key issues which need to be addressed in the LDF informed by recent studies relating to the Stonehouse and West Hoe Study and the Millbay Action Plan as well as Stonehouse Area Plan, Millbay Regeneration Plan and Community Planning Studies. It also includes a set of principles which have fed onto the Area Vision Statement in the Submission Draft Area Vision. This has been expanded since the June 2005 edition, preferred option 27 to:

- create vibrant, well connected unique neighbours;
- create a quality and vibrant Union Street;
- promote positive mixed use regeneration of disused and under-used sites, including tall buildings
- create a stunning and high quality waterfront;
- create an attractive, vibrant and convenient link;
- positive connections that are safe and convenient and well served by public transport;
- capitalise on the historic assets;
- provide a mix of uses in the area;
- provide a new office quarter; and
- encourage new Marine based employment that capitalise on its location.

The revised section also emphasises where the focus of implementation will lie.

3.32. The supporting text to Vision 2 also points to the area’s vulnerability to long-term tidal flooding identified in the Strategic Flood Risk Assessment.

3.33. **The City Centre and University:** This section has been expanded in the Submission Draft of the Core Strategy informed by studies such as the Plymouth Shopping Study 2006 which suggests the City Centre is healthy in terms of retail. A number of issues are highlighted including the relationship of adjacent sectors or infrastructure to the Centre such as the railway station, University and Plymouth College of Art, as well as the poor quality of some buildings and the public realm and narrow mix of uses. The City Council outlines a number of key objectives which are transposed into the Area Vision and expand on preferred option 28. Some of the key objectives are to:
• diversify the functions of the City Centre, including the introduction of tall buildings;
• create a real downtown by intensifying development;
• provide some quieter areas;
• attract specialised shops, pubs, entertainment and culture;
• develop strong, direct and meaningful connections;
• integrate and reinforce the role of the University and Cultural Quarter;
• create a more urban environment in the University area;
• enrich the quality of the environment;
• create better pedestrian permeability north and south; and
• consider the heritage value; and
• selectively introduce traffic back into parts of the city centre

3.34. **The Hoe:** As in the case of the other Area Visions and Strategies, the Submission Draft of the Core Strategy expands on the context of planning for the Hoe and highlights a number of key issues facing the area. It emphasises the marked disparities in wealth, educational attainment and relative advantage of different sections of the community. Other issues mentioned relate to movement and legibility as well as tensions between tourism and visitor pressures and residents. The Submission Draft defines a set of opportunities for change and these are reflected in the Vision and outlined below. These opportunities expand on preferred option 29. In addition this section identifies a set of mechanisms for implementation. Opportunities for change include the need to:
• maintain a unique, high quality, well resourced and engaging tourist and leisure destination;
• enhance the built environment and address regeneration;
• improve the range and quality of public facilities and information;
• provide a memorable link between the Hoe and the City;
• improve pedestrian movement; and
• provide high quality public, water and sustainable transport facilities.

3.35. **Sutton Harbour:** The Submission Draft of the Core Strategy expands on the context for Sutton Harbour and sets out some of the initiatives which are driving the regeneration of the area. These include an Action Plan and partnership working. Although the area has benefited from investment; significant issues and regeneration opportunities remain to be addressed and these include traffic noise and pollution, limited green space and a shortage in the number and quality of local facilities, shops and amenities. Based on these issues, the City Council seeks to guide development to deliver a “high quality, vibrant city quarter – balancing the need for economic investment and tourism with meeting local community needs, whilst conserving the special historic character of the Barbican, Bretonside and Coxside for future generations.” The Submission Draft Area Vision identifies a number of objectives and expands on preferred option 30 which seek to:

• conserve and enhanced the special historic character;
• promote positive mixed use regeneration of disused and under-used sites, including tall buildings
• create a safe, high quality environment with a linked network of attractive public space;
• provide enhanced neighbourhood centres;
• create a high quality integrated mixed use urban village;
• capitalise on the excellent waterfront; and
• ensure the area is easy to walk and cycle to and through.

3.36. **East End:** The area vision for the East End has been expanded in the Submission Draft and outlines a number of key issues including a shortage in the number and quality of local facilities, shops and amenities, parks and green spaces, limited access, fragmented neighbourhoods, traffic noise and air pollution, large vehicles accessing the area and the volume of through traffic. The Council’s approach to this area is to achieve a balanced, sustainable and mixed use linked community with a full range of high quality housing, facilities, services and open spaces. Based on the City’s approach, the Submission Draft Area Vision includes a number of objectives, expanding on preferred option 31. It seeks to:

• deliver strategic transport solutions;
• promote high quality mixed use sustainable regeneration;
• improve the quality and viability of residential environments;
• promote public access to and enjoyment of the waterfront;
• maintain and enhance the commercial port and marine related employment;
• improve the quality of the existing housing stock to address issues of affordability; and
• conserve and enhance the area’s natural and built historic environment assets.

3.37. **Central Park:** The Submission Draft of the Core Strategy expands on the June 2005 document, providing further information on the Park’s key elements and highlighting a number of priority issues for regeneration. These include the degraded sense of place, remoteness and poor quality private and public transport facilities, unsafe nature of existing footpath links and the poor relationship between the edge of the City and the Park in some locations. The City Council identifies a number of opportunities to enhance the Park including the development of a Life Centre and a new public transport interchange as well as utilising sites within and adjacent to the Park more efficiently. The Submission Draft Area Vision includes a number of objectives, expanding on preferred option 32. It seeks to:

• create a landmark and memorable Life centre;
• create a park with desirable high quality, vibrant spaces, while safeguarding its value as a wildlife centre;
• with safe and well connected routes;
• high quality public and sustainable transport facilities;
• improve and strengthen the relationship of the park and surrounding city; and
• improve the range and quality of public facilities.

3.38. **North Plymstock:** Compared to the June 2005 document, the Submission Draft of the Core Strategy expands on the key issues of the area. It states that given the area will be subject to significant change over future years a number of key issues will need to be resolved. These relate to the need to deliver new development, integrate
development within the remainder of the city, improve transport links and promote sustainable modes of transport, protect environmental assets, reinforce the area’s identify, consider an after use of Chelson Meadows and safeguard current and future mineral reserves. The Submission Draft Area Vision seeks to achieve a coordinated approach to the planning and delivery of options working with South Hams District Council. Key objectives, which expand on preferred option 33 in June 2005 are to create:

- a high quality sustainable new neighbourhood;
- a neighbourhood at Sherford which integrates with the rest of Plymouth;
- an integrated sustainable transport network;
- deliver a new Countryside Park;
- provide a new high quality eastern gateway;
- safeguard future waste management activities;
- safeguard potential post 2016 development options; and

3.39. **Derriford and Seaton:** This area vision and strategy has been altered substantially during the preparation of the Core Strategy. Although the June 2005 edition preferred options 34 highlighted the need to create a new centre as a focus for northern Plymouth, the detail relating to its future role has been expanded on in the April 2006 and now June 2006 Submission Draft of the Core Strategy. The Submission Draft identifies the need to optimise the area’s assets for the benefit of the area and the city, improve the relationship of development and greenspace, and improve access to the wider countryside as well as build on the area’s existing regional and sub regional facilities. The vision for the area expands on the April 2006 version with additional clauses relating to the need to:

- facilitate public transport, cyclist, pedestrian and vehicular access in a sustainable way;
- create a strong urban form utilising distinctive high quality architecture and spaces;
- create a high quality, safe and accessible environment; and
- create key linkages with surrounding areas.

The area vision and strategy like the remaining eight areas also emphasises key areas of implementation.

**SA/SEA Findings**

3.40. Whilst all of the area visions/strategies broadly coincide with sustainability objectives a number of issues are raised from the SA/SEA review.

3.41. **Area Vision 2 – Millbay and Stonehouse:** The supporting text to this Vision acknowledges that the Strategic Flood risk Assessment identifies certain areas within Millbay and Stonehouse as vulnerable to long-term tidal flooding. While flooding is addressed in policies elsewhere in the Core Strategy document, it is uncertain as to the implications of this for development at this site, and no specific restrictions or mitigations are proposed. Developments at risk from long-term flooding in this area should be subject to specific flood risk assessment and incorporate the necessary specification for mitigation at the design stage.
3.42. Area Vision 3 – Plymouth City Centre: This Vision states that the council aims to “selectively introduce traffic back into parts of the city centre”. However, the role, function and way in which traffic will be reintroduced is not discussed. While it would be desirable to increase accessibility to certain areas of central Plymouth, there could be negative consequences if this were to mean the introduction of significant numbers of private cars. Redevelopment of the City Centre in a way which merges the Abercrombie and latest visions should be seen as an opportunity to help create car-free zones and innovative people-mover systems with the main emphasis on public transport and green travel infrastructure.

3.43. The SEA raises a number of general questions in relation to the Visions/Strategies as a whole. These questions have been summarised in Table 1 alongside Plymouth City Council’s responses to them as reported in July 2006.

<table>
<thead>
<tr>
<th>Questions raised by SEA</th>
<th>Plymouth City Council Response:</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>What measures can be introduced to ensure that new employment opportunities are available to local employees/unemployed rather than encouraging in-migration?</td>
<td>Strategic Objective 6 point 4. Policy CS04 point 9.</td>
<td></td>
</tr>
<tr>
<td>Will future proposals upset the existing demographic profile in the area in question and will this have a positive or negative effect?</td>
<td>Addressed through Strategic Objective 3 and the ‘sustainable community assessments’ approach</td>
<td>Objective 3 seeks to deliver the Government’s policy for building sustainable mixed communities.</td>
</tr>
<tr>
<td>Will achieving a high quality environment prejudice existing local communities by driving up costs of housing and increasing costs of convenience purchases?</td>
<td>Strategic Objective 10 point 3 and Policy CS15 Overall Housing Provision. Strategic Objective 7 point 1.</td>
<td></td>
</tr>
<tr>
<td>Have the impacts on communities’ quality of life from adjacent land uses (relating to night/evening economies, waste, minerals and industrial activities) been fully considered?</td>
<td>Policy CS13 Evening/Night-time Economy Uses. Policy CS24 Mineral Development. Policy CS04 point 10. Policy CS34 point 4.</td>
<td>Detailed impacts of suitability of adjacent uses and potential use of mitigation measures would be addressed at the detailed AAP or Site Allocations plan level.</td>
</tr>
<tr>
<td>Have the impacts on adjacent land uses from new development proposals been considered and will the viability of such uses suffer?</td>
<td>Policy CS01 Development of Sustainable Linked Communities and CS34 Planning Application Considerations.</td>
<td>Considering neighbouring land uses is a statutory requirement of land use planning. Policy framework will ensure that issues arising from new development proposals will be properly addressed.</td>
</tr>
<tr>
<td>Will there be impacts on aquatic habitats from waterside</td>
<td>Strategic Objective 11 points 1, 3. Policy CS19 Wildlife.</td>
<td></td>
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<tr>
<td>Questions raised by SEA</td>
<td>Plymouth City Council Response:</td>
<td>Comment</td>
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<td>developments and, in particular, marine related industries?</td>
<td></td>
<td></td>
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<tr>
<td>Have issues relating to overshadowing, wind funnelling and visual impacts been considered in the siting of development within high density locations?</td>
<td>Policy CS34 points 4, 6. Policy CS20 point 4.</td>
<td></td>
</tr>
<tr>
<td>In areas where there will be an increase in visitor activity has consideration been given to the provision of a public transport service both day and night?</td>
<td>Strategic Objective 14. Policy CS27 Supporting Strategic Infrastructure Proposals and CS28 Local Transport Considerations.</td>
<td>See LTP2.</td>
</tr>
<tr>
<td>Has the carrying capacity/threshold for visitors been determined in prime tourist areas within the City and how will this be monitored?</td>
<td>City Marketing Company will be developing a tourism strategy. Impacts can be managed through a Plan, Monitor, Manage approach</td>
<td></td>
</tr>
<tr>
<td>What measures have been taken to minimise car parking provision?</td>
<td>Policy CS28 points 4, 5, 6.</td>
<td></td>
</tr>
<tr>
<td>Is there an opportunity for dual use of facilities especially in higher density locations?</td>
<td>Policy CS14 point 2. Policy CS34 point 2.</td>
<td>Dual use will be explored where it is possible e.g. North Plymstock AAP. However this will be judged on an area-by-area basis, as not all sites are suitable.</td>
</tr>
<tr>
<td>How will the development integrate visually with other features/developments on the skyline?</td>
<td>Policy CS34 point 4. Strategic Objective 4. Policy CS02 Design and CS03 Historic Environment.</td>
<td></td>
</tr>
<tr>
<td>What will be the impact on displaced land uses including bad neighbourhood land uses and the implications of travel for local employees?</td>
<td>Policy CS04.19 provides for the re-location of bad neighbour uses.</td>
<td>Policy aims to locate businesses in most suitable locations. Improved public transport network will minimise problems for local employees.</td>
</tr>
<tr>
<td>Will short term impacts associated with construction and relating largely to air, noise and water pollution be mitigated?</td>
<td>Policy CS22 Pollution.</td>
<td>Development Control working with Environment Agency and Environmental Health will manage using codes of construction for major applications.</td>
</tr>
<tr>
<td>During the operation/implementation phase of a development, how will issues relating to vibration,</td>
<td>Policy CS22 Pollution.</td>
<td>Development Control process will provide for mitigation measures and use codes for construction to manage</td>
</tr>
</tbody>
</table>
3.44. The SEA/SA recognises that the LDF will not be able to address some of the following issues immediately, but would wish these questions to be considered when future proposals are brought forward.

3.45. All area visions and strategies need to reflect clear design principles which seek to achieve high quality design and the use of sustainable design and construction techniques.

Plymouth City Council Comment:
The council seeks to achieve high quality, sustainable design and construction through Strategic Objective 4, Policies CS02, CS03, and CS34 - Planning Application Considerations, as well as the Design Strategy SPD.

3.46. Proposals must ensure that the issues shown in Table 2, are dealt with (some of which are covered elsewhere in the LDF). The council’s responses to the SEA findings are also shown alongside these issues in Table 2.

Table 2

<table>
<thead>
<tr>
<th>Issues</th>
<th>Plymouth Council’s response to the SEA findings</th>
</tr>
</thead>
<tbody>
<tr>
<td>Promote the sourcing of local materials to reduce vehicular trips,</td>
<td>Strategic Objective 12- safeguarding the continued extraction of local mineral resources for building. Developed through further objectives on encouraging the reuse and recycling of materials throughout strategy.</td>
</tr>
</tbody>
</table>
Issues | Plymouth Council’s response to the SEA findings
--- | ---
Reduce energy and water consumption, | Policy CS20 Resource Use.
Minimise waste generation, | Strategic Objective 13. Policy CS26 Sustainable Waste Management.
Ensure that there is adequate provision of green space for formal and informal recreation, | Policy CS18 Plymouth’s Green Space. Policy CS30 Sport, Recreation and Children’s Play Facilities.
Ensure that development reflects local distinctiveness, | Policy CS02 Design.
Minimise car parking provision. | Policy CS28 points 4, 5, 6

3.47. It should be noted that for many of the Area Action Plans it is only possible to make limited judgements about the sustainability of the individual visions/strategies, in the absence of a clear understanding about the proportion of housing and employment land allocations, the relationship of areas to proposed improvements in the public transport network and car parking standards.

**ECONOMY & EMPLOYMENT**

*Evolution of the Core Strategy*

3.48. A substantial amount of new work was carried out by the City Council and its consultants on the economic strategy, employment demand and employment land availability between June, 2005 and March 2006. This resulted in some key revisions to the economic and employment sections of the April report which were considered in the SEA/SA. The Draft Submission of the Core Strategy incorporates the earlier findings of the planning studies and provides further detail on planned growth sectors but does not alter the basic direction and focus of the economic strategy.

3.49. The view was taken in the early stages of the SEA/SA (June 2005) that projections of economic growth could be over-optimistic (see quotation 2).

**SEA/SA June – Quotation 2**

In reviewing the Preferred Options it is considered that the LDF’s proposals may be over-ambitious. This comment is made against findings from the “Sustainability Growth Distribution Study, 2005\(^2\) which states that Plymouth has one of the lowest levels of economic activity in the region; at 76.6% and the stock of VAT registered business has fallen by more than 10% over the period 1996-2002. As the report states “these are signs not of economic prosperity but of a local economy under economic stress and fragility”.

3.50. Subsequent reviews of employment potential (EDAW Consultants, 2006) show strong growth in Plymouth of 16,749 jobs between 1998 and 2003, equating to 3,350

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new jobs per year. Lower growth rates are built into the latest assessments and the Core Strategy now seeks to build on growth sectors that are seen to offer specific opportunities in the Plymouth travel to work area.

3.51. The Submission Draft of the Core Strategy provides a description of Plymouth’s economic role in a national and regional context and quotes its status within RPG 10 and the emerging Regional Spatial Strategy. It continues the City Council’s policy of taking an interventionist approach towards employment provision (as reflected in the Revised Preferred Options Document). This targets specific employment sectors and reflects a more sophisticated approach towards calculating employment land demand.

3.52. Five themes have been developed under the emerging economic strategy. These aim to diversify the business base, promote skills and learning, improve infrastructure and access, promote economic inclusion and encourage leadership and governance. In addition, the strategy proposes a targeted approach to boosting long term performance, including interventions on six priority growth areas comprising:

- Advanced engineering,
- Business services,
- Creative Industries,
- Marine Industries,
- Medical and Healthcare, and
- Tourism & Leisure

3.53. In addition, Plymouth’s draft Economic Strategy proposes that special priority is given to financial and business services, creative industries and tourism.

3.54. Analysis of future demand for employment and employment land suggests a requirement for 1 million sq. m. (97 hectares) of floorspace / land in the period to 2026, with the bulk (62ha) being located on business parks, 16 ha in the City Centre and Waterfront and 12 ha at A38 locations.

3.55. Goals and Strategic Objectives are set for delivery of the economic vision within the spatial planning framework as follows:

1) Support economy through protecting and enhancing city’s unique assets,
2) Create balanced, diverse and knowledge intensive business base,
3) Build sustainable communities by providing employment within neighbourhoods, improving accessibility and childcare provision,
4) Develop skills base and training,
5) Promote bi-polar economy in City Centre and Derriford
6) Ensuring development within the city is consistent with the Draft Economic Strategy

3.56. The authority has set specific targets to help deliver the goal within the period (2001-2016) which are:

- Delivery of at least 4 ha of new employment land per annum to 2016 and 4.5 ha beyond,
- Delivery of 13,000 sq.m new office development within the city per annum,
• Net increase of 1,800 employees per annum

**SEA Findings**

3.57. The drive towards promoting economic growth and attracting investment, and in turn stability, is critical to the LDF achieving its goals. However, provision of the required employment land will give rise to some adverse effects on the environment and communities which will need to be mitigated as far as possible.

3.58. The key negative impacts include the erosion of landscape character, biodiversity and heritage/archaeology, impact on communities' quality of life, viability of adjacent land uses and displacement of existing businesses and the generation of cumulative effects from incremental development. As with all development, the scale, duration and significance of such impacts will depend on the timing and location of development.

3.59. Large employment sites should be located close to sustainable modes of transport and opportunities should be explored to encourage developers to submit Green Travel Plans and adhere to environmental friendly management practices.

3.60. The City Council's decision to adopt an interventionist strategy will create more opportunity to address each of the sustainability criteria as development proceeds than would be the case with a reactive policy, simply seeking to manage the effects of change. For example, with an interventionist approach, sustainable transport issues can be addressed. Community health can also improved by ensuring that development near housing areas is of appropriate quality.

3.61. An approach which focuses on growth sectors, indigenous potential and entrepreneurship, should have a positive impact on economic growth, making use of local skills. This approach also has scope for strengthening the role of district centres, with the possibility of smaller business (requiring less land take) able to locate themselves closer to the city centre.

3.62. The proposals recommended in Policy CS04 are relatively supportive of the sustainability objectives, however there are still likely to be a significant number of uncertain effects. Any new developments should be sensitively sited, so as to avoid detrimental effects on nature, environment (e.g. sensitive intertidal zones etc) and biodiversity.

3.63. When determining individual sites for future employment the City Council should pay particular attention to sustainability criteria relating to optimising land use and achieving sustainable resource use.

3.64. Any new developments, particularly those with a large land take could have negative impacts in terms of exacerbating flood risk, through an increase in impermeable surface area, reducing infiltration and increasing surface runoff.

3.65. There are direct links between employment policies and the demand of housing in particular areas and these should be reviewed in an integrated manner.

3.66. Focusing development in the city centre, waterfront regeneration and university area, should have strong economic benefits in strengthening the role of the City and District Centres; in encouraging use of existing buildings and infrastructure, and in
reducing the need to travel, although the extent of these benefits will be partially dependent on the related policies on housing (its availability and location/distance) and public transport provision.

3.67. The relocation of “bad neighbour uses” should increase safety and wellbeing, with a positive impact on community health.

3.68. A range of supporting measures to increase workforce skills has the potential to encourage economic growth, through a positive impact on employment and education. This could lead to a positive effect in terms of community health.

3.69. Changes to the range of employment opportunities and shopping hierarchy in support of building sustainable linked communities, should have a positive effect on sustainable transport if people are able to make use of public transport, and travel shorter distances to work and shop. Conversely there could be a negative effect if congestion occurs as a result of inappropriate transport infrastructure which is unable to handle increased traffic volumes. With proper management, there could be potential positive impacts in terms of strategic communication links.

3.70. Further questions have been raised by the SEA/SA process that will need to be kept under constant review as the plan evolves. These are:

- Will the creation of new employment sites merely result in the relocation of some businesses to more attractive, new locations having negative consequences on those areas that are vacated?
- What measures will be in place to compensate displaced businesses?
- Are the six priority economic sectors for growth appropriate, given that the above study indicates that advanced engineering and marine technologies /industries are “forecast to decline over the period to 2026”

3.71. One other issue that will need careful attention is the emphasis on developing large sites adjacent to the A38. While this is clearly beneficial in easing traffic pressure within Plymouth itself, the growth of city-edge employment sites may exacerbate long-distance commuting which is highly unsustainable.

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**Plymouth City Council’s response to the Draft Submission Core Strategy SEA Findings**

The Council will address the issue of mitigation through general policies regarding the environmental impacts of development.

The Council is promoting accessibility of development through its “sustainable community” policies in the Core Strategy.

The Council will promote Green travel plans in the transport section of the Core Strategy.

The council aims to address the key negative social and environmental impacts associated with rapid economic growth and investment through Strategic Objective 4 and Policy CS34 - Planning Application Considerations.

In relation to sustainable transport, Plymouth has in practice already a record in obtaining Green Travel Plans from larger employers. However monitoring of the plans effectiveness needs to be addressed through the plan, monitor mange.
approach in association with Policy CS04 point 1 and Policy CS28 point 2.

The council aims to locate new development in a manner that is sensitive to the natural environment and biodiversity in accordance with Strategic Objective 11 and Policy CS19 - Wildlife.

The council aims to optimise land use and use resources sustainably through Strategic Objective 3 and Policies CS01 and Policy CS20 - Resource Use. Individual sites will be assessed against sustainability criteria at planning application stage.

In relation to negative impacts of new development in terms of flood risk Strategic. All new development will be considered in the light of the Strategic Flood Risk Assessment completed June 2006

Local employment opportunities can be spread across the city to spread housing demand. However strategic employment sites can only be located where suitable sites are available, in which case sustainable public transport networks will be used. See Strategic Objective 3 and Policy CS07 - Plymouth Retail Hierarchy.

Policy is focused on sites suitable for modern employment and sites which are no longer suitable for modern employment will be assessed for suitability for other uses. The Employment Land Review provides the evidence base for this in alongside Strategic Objective 6, Policy CS04 - Future Employment Provision and CS05 -Development of Existing Sites.

The council aims to minimise negative impacts of relocation to Businesses through the implementation of Policies focused on finding most suitable locations for businesses.

The findings of the study showing that the advanced engineering and marine technologies /industries are “forecast to decline over the period to 2026” are rejected because the Sustainable Growth Distribution Study (2005) and Employment Land Review (2006) show that it is necessary to look at the wider Plymouth area to get full picture for the six priority economic sectors for growth

The problem of long-distance commuting in relation to developing large sites adjacent to the A38 Policy CS28 Local Transport Considerations. Strategic Objective 6 and Policy CS04 provide for an appropriate balance in terms of making provision for future employment needs.

SHOPPING

3.72. The underlying approach to shopping in Plymouth is described as:

“Ensuring that everyone has access to the range of shops which meets their needs, in a sustainable way in order to deliver Plymouth’s sustainable communities agenda. A healthy and vibrant City Centre is also essential to Plymouth’s economic well-being.”

The initial response of the SEA/SA (June 2005) noted:
These proposals are generally supported against the sustainability objectives. They seek to redress the imbalance in retail provision and concentrate development in local and district centres which are accessible by sustainable transport modes and will help to develop sustainable communities. Proposals should encourage a diversity of employment opportunities and support the vitality and viability of commercial centres.

Care needs to be taken when considering development that sites of landscape, nature conservation, heritage and archaeological interest are not eroded and that the local distinctiveness of the area is enhanced.

The City Council should monitor land uses to ensure an area has a broad range of uses.

3.73. Extensive revision and development of shopping policies has taken place in preparing the Core Strategy submission draft, based on commissioned research (Cushman & Wakefield, July 2006). The analysis takes into account policy requirements of national guidance, RPG 10 and the emerging Regional Spatial Strategy, Safeguarding and enhancing the City Centre as a major regional centre is seen as a priority, followed by preserving and developing a network of local centres. Derriford has a key role as a district centre for the north of the city and has potential to grow in the long term.

3.74. In terms of Comparison goods it is estimated that about £1.245 billion of total annual spend is available within the Plymouth catchment area. Of this the combined turnover was estimated to be £917.87m or 73.7%. Of this the City Centre accounts for around half the expenditure.

Strategic Objective 7 aims to:
1) To meet demonstrated shopping need,
2) To maintain and enhance the City Centre’s role as a regional shopping destination
3) To protect the primary retailing role of the City Centre
4) To remedy identified food shopping deficiencies in western Plymouth
5) To promote a district centre at Derriford
6) To promote the sustainability of new major developments in Plymouth, particularly at Millbay and Plymstock Quarry,
7) To strengthen district and local centres by encouraging a range of facilities and uses, consistent with the scale and function of the centre,
8) To facilitate implementation of the Eastern Corridor transport proposals and regeneration in the East End.
9) To reappraise on at least a 5 yearly basis the need and potential for shopping development in Plymouth.

Targets

3.75. Progress towards achieving this objective, will be measured against the following targets:-
1) To achieve an increase in retail capacity for comparison goods of between 57,000 and 92,000 sq m net by 2016.
2) To achieve an increase in retail capacity for comparison goods of between 106,000 and 172,000 sq m net by 2021.

3) To deliver a new district centre at Derriford to serve northern Plymouth by 2016, and to monitor its potential to grow in the future in a way that is complementary to the City Centre through the Plan Monitor Manage process.

4) To deliver a new local centre at Weston Mill by 2016.

5) To deliver new local centres at Devonport, Millbay and Plymstock Quarry by 2016.

6) To deliver a consolidated retail warehouse location on Laira Embankment by 2016, which will also assists with the delivery of strategic transport proposals for Plymouth’s eastern corridor.

7) To complete a revised Shopping Study for Plymouth by 2011.

**SEA Findings**

3.76. The SEA/SA of Preferred Options (June 2005), the Key Revisions to the Preferred Options (April 2006) and the Submission Draft are all broadly supportive of the retail strategy although concerns remain that development of district centres should not detract, or draw resources away, from the City Centre retail redevelopment. These concerns are emphasised by the results of the Plymouth Shopping Study which indicates that demand for new floorspace is relatively weak at present. However, the Draft Submission document recognises that the city must attract outside investment in order to expand retail in order to avoid detracting from existing retail centres.

3.77. The Submission Draft also provides substantially more detail on the differences between the retail facilities to be provided in district centres and the City Centre which goes a long way towards allaying these fears. Policy CS07 is introduced, alongside Policies CS06, CS08, CS09 and CS10 which also provide clarity and the necessary assurances that the types of retail provision will be carefully regulated in the interests of protecting the vitality and viability of the City Centre and delivering sustainable neighbourhoods. These Policies are considered to be broadly sustainable in the light of these revisions.

**CULTURAL USES AND THE EVENING/ NIGHT-TIME ECONOMY**

*Culture and evening/night economy:*

3.78. The LDF proposals take a positive approach to redressing the conflict between promotion of evening/night uses and communities while at the same time protecting communities’ quality of life, encouraging diversity and new employment opportunities. However as the SEA/SA review highlighted in June 2005, it may be difficult to encourage alternative new development in areas where there are existing problems with drinking establishments/night clubs. In addition, in tourist and leisure locations care needs to be taken to ensure that proposals do not impact on communities’ quality of life during the day and night.
3.79. Incentives may have to be offered for new businesses to locate in areas suffering problems with excessive noise, litter, crime and antisocial behaviour through, for example, low business rentals. Concentration of land uses associated with evening use must be closely monitored to ensure it does not exceed capacity, and for tourist/leisure areas of the City, a detailed assessment should be undertaken into the carrying capacity of the area for tourists.

3.80. The City Council has established the Creative Plymouth Initiative to develop appropriate proposals and is also preparing a Cultural Strategy and a Sports Facilities Strategy.

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<thead>
<tr>
<th>Plymouth City Council Response:</th>
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<tbody>
<tr>
<td>Policy CS13 - Evening/Night-time Economy Uses, states that in areas where there are existing unacceptable problems of disorder in relation to A4 uses (bars ad pubs) there will be a presumption against further large scale facilities</td>
</tr>
<tr>
<td>Policy CS13 states that new use should support the creation of a balanced provision of evening / night time uses in order to avoid negative impacts on community quality of life.</td>
</tr>
<tr>
<td>In relation to incentives for new businesses to relocate from problem areas, the overall approach of the LDF seeks to encourage the regeneration of problem areas.</td>
</tr>
<tr>
<td>It is the opinion of the council that the carrying capacity of tourists is a tourism rather than evening/ night time economy issue. The City Marketing Company will be developing a tourism strategy that should address this issue.</td>
</tr>
<tr>
<td>Strategic Objective 8 seeks to promote local culture and leisure venues in other parts of the city to enhance local provision.</td>
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<thead>
<tr>
<th>Revised SEA/SA Assessment</th>
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<tbody>
<tr>
<td>The revised policies on employment, shopping and transport should help to stimulate culture and the evening/night economy within key locations of the city and improve the sustainability of these uses. It will be important to ensure that other less accessible areas of the city do not lose out from concentration of key resources in the city and district centres.</td>
</tr>
</tbody>
</table>

**EDUCATION**

*Education/Skills:*

3.81. At local government reorganisation in 1998, Plymouth City Council took over a significant amount of surplus school capacity. The council has now developed a plan for rationalisation which will involve some amalgamation and new building.
3.82. Proposals to invest in educational facilities and infrastructure, reuse existing infrastructure, safeguard key sites for education, and widen the community use of school facilities are a very positive opportunity to improve access to learning, skills and training for all ages and improve community integration. In addition, the provision of affordable childcare facilities in marginal areas is welcomed by the SEA and should provide social and economic positive benefits. Potential negative effects or uncertainties are associated with the erosion on landscape, biodiversity, archaeology and heritage through new school development. In addition, falling birth rates and smaller school roles could result in the need to widen school catchment areas which may, in turn, create a pressure on the existing public transport network. There is also the potential for redundant school buildings to be reused for non-educational uses without considering the status and future use of associated playing fields and open space.

3.83. All proposals need to be considered against the opportunity to link into the public transport network and improved cycle paths and footpaths.

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**Education and Skills: Revisions to the SEA/SA**

a) Plymouth City Council Response:

The selection of sites criteria includes assessment of sustainability including landscape and biodiversity etc. and the School Implementation Plan 2005-15 includes most efficient and sustainable locations for schools taking account of transport implications.

Policy CS14 states that education facilities should be well designed and related to neighbourhood and services and amenities, and easily accessible by sustainable transport modes.

In relation to the reuse of redundant school buildings for non-educational uses without considering the status and future use of associated playing fields and open space, the council points to Policy CS14 - New Education Facilities, which states that the redevelopment of such sites should support the creation of sustainable linked communities, including open spaces and playing pitches.

The School Implementation Plan 2005-15 includes linking to public transport and encouraging walking and cycling in accordance with Strategic Objective 14 and Policy CS28.

b) Nature of Revisions to the Preferred Option

No major changes have been made to the education and skills section of the Preferred Options, but there are significant additional areas of emphasis in the employment section on this topic.

c) Revised SEA/SA Assessment

There is increased emphasis on skills training and higher education which will help to ensure delivery of the relevant sustainability objectives.
The supporting text to the Council’s Policy Framework states that “the rationalisation of four primary schools in Southway is under consideration”. It is assumed that this may mean the closure or relocation of these schools. The policy framework should ensure that the outcome of this process will not disadvantage existing or future pupils and will not force pupils to undertake longer journeys to school.

**HOUSING**

**Housing:**

3.84. Housing objectives and policies are based on extensive evidence from urban capacity studies and housing needs assessments and on the policies of RPG10 and the emerging Regional Spatial Strategy. The latter strategy suggests that Plymouth will need to build some 17,250 dwellings over the period 2006-2021 (1,150 dwellings per annum). At April 2006 there were existing commitments for 3,893 dwellings with an additional 2,000 to come forward through conversions. Offset against the requirement for 17,250 dwellings the remaining requirement to provide new dwellings through LDF stands at 11,400. Table 3 shows the estimated distribution of the housing provision across the Plan area.

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<tbody>
<tr>
<td>Waterfront Regeneration Areas</td>
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<td>Eastern Corridor</td>
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<td>Northern Corridor</td>
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<tr>
<td>Rest of the city</td>
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<tr>
<td>New sites to be brought forward 2006-21</td>
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3.85. Historically Plymouth was exposed to low wage levels although this was offset by low house prices. While both wages and house prices have grown in recent years there is now a widening gap between cost and affordability.

3.86. In order to deliver the Plymouth Vision and achieve the overall housing objectives, a statement of goals and strategic objectives supported by three policies has been prepared. The strategic objectives aim to:

- Prioritise locations for development to support mixed-use and balanced communities,
- Prioritise the use of previously developed land, vacant or underused buildings and promote the highest reasonable densities,
- Provide an appropriate mix type and tenure of housing in a range of locations,
- Ensure at least five years supply of housing land,
- Use plan, monitor and manage approaches to ensure housing supply.

3.87. Policies CS15 and CS16 generally focus on overall housing provision and the spatial distribution of sites. Housing density is addressed in the supporting text and Policy
CS17 takes into account considerations relating to the provision of land, services and facilities for Gypsies and Travellers.

3.88. Proposals should seek to ensure that new development adheres to sustainability principles of construction and design (as discussed earlier under the heading of delivering quality), seeks to minimise the number of car parking spaces and encourages connectivity and accessibility through the development itself as well as linking to existing communities.

3.89. Measures need to be taken to prevent incremental development beyond the agreed limits of new settlement boundaries and encourage the utilisation of existing buildings. As with all development the scale, duration and significant of such impacts will depend on the timing and location of development.

3.90. Taking a step back from Plymouth’s current proposals, we have to recognise that the factors which influence how people live, work and play are extremely complex. Their decisions are not merely dependent on the proximity to work/home but also on quality of life, proximity to their friends and access to the countryside. We must also question whether such development will succeed in meeting the needs of those currently disadvantaged in local communities (rather than those with substantial incomes) and whether a target of 25% affordable housing is achievable. By advocating high quality design and the restoration of prime sites (many of significant historical interest) such as waterfront dwellings, local communities may be priced out of the market by “incomers” able to pay higher prices and meet developers’ costs.

**SEA Findings**

3.91. Growth in population is a cornerstone of the Vision for Plymouth in achieving critical mass for economic activity and the provision of services and facilities. These housing proposals are a logical and necessary extension of that vision. Through the evolution of the Core Strategy the current targeted approach towards employment generation, an interventionist policy on types of employment and its location, and similar revisions to shopping and transport should help to release more land for housing and support decisions on areas of housing need and improvement.

3.92. The Submission Draft outlines the emergence of affordable housing as a local issue and this raises a substantial challenge to the achievement of Plymouth’s housing vision. Much of the housing stock in poorer parts of the city will need to be upgraded or replaced during the plan period but the imbalance between wages and house prices will limit the scope for many residents to buy renovated or new properties, while investors may be reluctant to finance low cost homes. The SEA/SA concludes that the issue of affordable housing will need to be explored further in order to avoid it acting as a constraint on overall delivery of the Plymouth Vision.

**Plymouth City Council Response:**

The target for affordable Housing has been raised to 30% and the threshold reduced to 15 dwellings in Policy CS15 because 25% affordable housing has been achieved already.

Higher proportions of affordable housing would make development unfeasible in
some waterfront locations and sufficient levels of affordable housing will be available in other areas to meet needs in accordance with Strategic Objective 3, and Policies CS01 and CS15 - Overall Housing Provision.

NATURAL ENVIRONMENT

3.93. The locational advantages of Plymouth as a coastal city are clearly stated in the Vision and are undoubtedly amongst its key assets but its position on the waterfront also raises some of the most serious questions in terms of long term sustainability and the risks of rising sea level. This topic is discussed at the end of this section.

3.94. The SEA/SA of Preferred Options made a number of observations that remain valid to the text of the Core Strategy and are set out in the box below.

**Original Version of Environment and Greenscape:**

Strong tensions exist between the protection of the environment and greenspace, and major development proposals relating to housing and employment land, infrastructure improvements, waste management and minerals extraction. The Council recognises these tensions and has drafted a very supportive proposal which seeks to minimise the effects on landscape, nature conservation, archaeology and heritage, reduce the consumption of non-renewable, increase renewable energy targets, minimise pollution and respond to flood risk. However, it has to be accepted that 20% of development will not take place on previously developed land and that some previously developed land is a valued resource which will be lost.

What is lacking from the proposal is how the City will respond to further sporadic/incremental development over and above the determined settlement/or employment allocated boundaries, how wildlife corridors and the visual integrity of large swathes of woodland running through valley corridors will be maintained. In addition it is unclear what sustainable development criteria will apply to proposals which may be promoted in flood risk areas.

Careful consideration also needs to be given to the visual integrity of Plymouth as a whole. Further development beyond that identified in the plan must be carefully monitored to ensure that there is no further erosion of the greenspace.

**Revised SEA/SA Assessment (April, 2006)**

The SA supports the Council’s approach and anticipates that these measures will have a positive impact on open space, biodiversity, pollution and the erosion of greenspace. However the amendments do not address these issues in relation to brownfield development.

**Comments on the SEA/SA**

The council aims to address issues of open space and creating an enhanced natural environment through Strategic Objective 11 and Policies CS01, CS18 Plymouth’s - Green Space and CS19 - Wildlife.
Strategic Flood Risk Assessment has been carried out. Areas with specific risk will be dealt with through AAPs and a Plan, Monitor, Manage approach in accordance with Policy CS21 - Flood risk.

MINERALS

Evolution of the Core Strategy

3.95. The underlying approach of the City Council’s to minerals is to:

“consider the development needs of the city and seek a sustainable balance between planning for an adequate supply of minerals and growth of the city.”

The initial response of the SEA/SA (June 2005) noted:

Plymouth has a wealth of limestone reserves lying predominately to the eastern edge of the city. Potential negative impacts from the continued excavation of Hazeldene Quarry relate to air, noise and water pollution, vibration and heavy vehicular movements from HGVs, the erosion of landscape character, biodiversity, archaeology and heritage, and impact on adjacent land uses and communities’ quality of life. The plan proposals envisage a change in the basic minerals extraction programme to allow northwards rather than eastwards extension of Hazeldene Quarry. This will maintain the present level of mineral reserves in the area while allowing for the Sherford new development to take place. There will inevitably be some sterilisation of future reserves.

The conclusion from the review is that a comprehensive EIA needs to be undertaken of the any future workings, monitoring plans need to be in place and appropriate mitigation measures take to overcome any negative impacts. In addition, where possible, there should be progressive restoration to safeguard, recreate or create new landscapes/habitats, which will include the reinstatement of soil where appropriate and rights of way.

3.96. Since June 2005, further work has been undertaken by the City Council to define a goal, strategic objectives and targets for minerals. The goal is to achieve a balance between the long term supply of minerals and the delivery of important development at Sherford. The LDF’s strategic objectives reflect this goal and seek to:

• safeguard the continued extraction and processing of mineral resource
• safeguard mineral reserves for future extraction
• Balance the impacts of mineral traction with environmental protection
• Facilitate improved pedestrian and cyclist connectivity
• Reduce the consumption of non renewable mineral resources by encouraging reuse and recycling

3.97. The targets are defined as below

• Identification of land consented for mineral extraction and processing and an appropriate buffer zone in the North Plymstock AAP
• Identification of Mineral Resource Protection Area in the North Plymstock AAP
• See waste core strategy section and targets developed in Waste DPD

3.98. In addition, a new Policy has been added to this section to address concerns highlighted in the SA/SEA relating to mineral development, Policy CS24. This Policy seeks to reduce or mitigate environmental impacts, ensure satisfactory after care and restoration and requires development to submit an Environmental Statement to be submitted at review periods to respond to unforeseen and significantly environmental impacts arising from mineral extraction. Policy CS23 has also been amended as a result of the SEA process to address concerns about development within buffer zones.

SEA Findings

3.99. Changes made to this section of the Submission Draft of the Core Strategy should address concerns raised in the SEA/SA review in June 2005. However there will be an inevitable loss of limestone at Sherford to make way for new development and sterilisation of land will occur.

Comments on the SEA/SA

The loss of limestone at Sherford is addressed in Minerals Strategic Objective 12-balance between safeguarding long term supply of minerals and delivery of strategically important development and Policies CS23 - Safeguarding Mineral Resources, and CS24 Mineral Development.

WASTE

Evolution of the Core Strategy

3.100. The Submission Draft of the Core Strategy states that the City Council is currently developing a long term waste management strategy for the City. The overall vision includes the need to ensure that the city is self sufficient as far as possible, takes a responsible approach to production, management and treatment and promotes waste minimisation. It also outlines a series of goals and targets. The City Council accepts that there will be no new suitable or viable landfill site and that the provision of landfill capacity will have to be provided outside the city, but within reasonable proximity to it.

3.101. Policy CS25 identifies Coypool, Chelson Meadow, Moorcroft, Prince Rock, and a number of smaller sites, for the development of a range of waste management and treatment facilities. Whereas Policy CS26 suggests a variety of mechanisms for waste minimisation including waste audits, the integration of facilities, a planning policy framework to control waste and work with others.

SA/SEA Findings

3.102. The findings from the first review of preferred options in June 2005 expressed concern as to whether sufficient action was being taken by the City to bring about a change in public attitudes leading to reduction of waste at source and an appropriate level of recycling. Despite the wish for Plymouth to be self sufficient and adhere to
the proximity principle, the interim proposals to transport waste beyond the City limits in response to a diminishing land fill capacity at Chelson Meadows are unsustainable in the longer term. In addition, there are uncertainties as to where waste will be transported to, what capacity such sites have and how waste will be transported. Negative impacts of waste relate to air and noise pollution, odour, health, quality of life, the impact on adjacent land uses and vehicular use in transporting waste potentially long distances. These impacts will be exacerbated if waste managers have difficulties responding to the enormity of the task and new development commences within the next five years.

3.103. The conclusion from the previous review was that there needs to be a strong commitment from the City Council to address the issue of waste which it is hoped will be covered through the Waste LDD, which should also respond to short and medium term issues. Whilst Preferred Option 2 takes a positive and proactive stance encouraging “waste minimisation and reuse, sustainable resource use during construction and the provision of adequate facilities for recycling within new developments”, more should be done to explore alternative mechanisms for waste transportation and innovative solutions to generate energy from waste.

3.104. Although, policies have been expanded to redress concerns over long term waste processing in the Submission Draft of the Core Strategy and the Council is preparing a revised Waste Management Strategy (due to be completed in early 2007). Further information is required to clarify where waste will be transported to outside the City’s boundary, when the four sites identified in Policy CS25 will be available to process waste and their capacity to treat waste. Given the fact that Chelson Meadow is due to close in 2007/08, there is an urgent need to resolve this issue.

**Comments on the SEA/SA**

The council points to Strategic Objective 13, Policy CS25 - Provision for Waste Management and CS26 Sustainable Waste Management as well as the emerging Waste LDD for further information on the transportation and management of waste.

**TRANSPORT AND CONNECTIVITY**

**Evolution of the Core Strategy:**

3.105. **Transport**: The Submission Draft of the Core Strategy takes an approach which seeks to “reduce the need to travel and deliver a sustainable transport network that supports Plymouth’s long term growth, improves the environment and provides a high quality of life for the city’s communities. The strategic objectives in achieving this goal are:

- to improve accessibility and social inclusion;
- to reduce the rate of growth of traffic congestion;
- to improve road safety;
- to improve the environment and quality of life; and
- to deliver an integrated sustainable transport programme for the city.”
Policies CS27 and CS28 provide further detail on car parking standards which seek to set a maximum level of provision for different types of development proposal. Further clauses have been included on walking and cycling and the promotion of water transport.

3.106. **Connectivity:** The section on connectivity specifically refers to a recent report on the future of Plymouth City Airport, by York Aviation. The report concludes that whilst the airport will make a substantial contribution to the economy of the city and the surrounding areas, if further enlargement does not take place to cater for the next generation of turbo prop aircraft, the facility is likely to close. Other studies used to inform this section relate to the most recent Local Transport Plan 2006 to 2001, by Plymouth City Council and Sustainable Growth Distribution Study, 2006 by Baker Associates.

3.107. The Plan aims to increase passenger numbers using Plymouth Airport to 580,000 per annum by 2021 as part of its goal to “improve connectivity with the rest of the UK, European and beyond and achieve a set of strategic objectives which relate to the port and waterfront land, the improvement of Plymouth airport and the development of infrastructure relating to telecommunications and information technology.”

3.108. The policy framework for transport and connectivity has been substantially revised and now consists of three policies. Policy CS27 provides detailed information on the requirements for improvements to the airport’s infrastructure, as well as rail, coach and port facilities plus improvements in information technology. Policy CS28 outlines the council’s aims of delivering a high quality and sustainable transport system for the city and reducing the need to travel through spatial planning and design. Policy CS29 aims to support development which improves the city’s telecommunications infrastructure in an efficient and sustainable manner and with a view to promoting home working.

**SA/SEA Findings:**

3.109. Proposals from the June 2005 document, relating to improvements in connectivity and transport in urban areas should instil greater business confidence, strengthen existing/future business sectors, overcome issues relating to social exclusion and deprivation, encourage more flexible working and to a lesser extent (depending on the mode of transport) have positive effects on air pollution and greenhouse gases.

3.110. Potential negative effects relate to the erosion of landscape character, biodiversity, archaeology and heritage, the severance of existing communities, the loss of important corridors for walking and cycling through the safeguarding of land for future development and the impact on adjacent land uses including the viability of local businesses and communities’ quality of life. In addition, whilst proposals seek to reduce vehicular emissions through the development of a Mass Transit Network with transport hubs and associated facilities and transport improvements by rail and sea, the promotion of a regional airport will result in an increase in air flights with negative consequences on greenhouse gases.
3.111. Added to this, the preferred options infer the application of “maximum car parking standards” but do not conclude whether there is a ceiling for the number of car parking spaces per household or per number of employees.

3.112. A number of questions face Plymouth City:

- How achievable is the Public Transport Network?
- Where will investment come from?
- Will the phasing of infrastructure proposals be in line with development proposals?
- Will it have the capacity to respond to levels of significant growth after 2016?
- What measures need to be taken if this does not occur?
- Will people make a modal switch?
- What are the implications on land safeguarded for future development?

3.113. To achieve this modal switch, a strong commitment should be made, not only by the City Council but also by existing and new businesses. Employers and developers need to be encouraged to submit Green Travel plans and promote flexible working patterns as well as explore with the Council opportunities to minimise car parking spaces and consider dual use. In addition to developing a reliable, efficient, flexible, “easy to use” public transport services, innovative solutions should be explored to reduce energy consumption through alternative fuel sources and solar powered signage.

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**Transport: Revisions to the SEA/SA**

*a)*  **Comments on the SEA/SA**

The Council agreed that negative impacts of new transport provision need to be addressed – through general policies regarding environmental impacts.

The Council accepts that an increase in the number of flights would result in more greenhouse gas emissions. However, it contends that the issue is considerably more complex than just looking at additional flights generated by Plymouth airport. It would not be appropriate to reject this option on the basis of a local Sustainability Appraisal.

The Council agrees that its parking standards need to be specific about ceilings in relation to households and employees.

The Council believes it has the right strategies to successfully deliver HQPT, and is working closely with stakeholders to get funding plans in place.

Green travel plans are supported and will be promoted in the Core Strategy.

*b)*  **Nature of Revisions to the Preferred Options For Transport**

Changes are proposed to the preferred options on transport following revisions to the Local Transport Plan (LTP2), a study into transport aspects of the Eastern Corridor and further study on the future role of Plymouth.
The review of transport issues by the City Council has included a number of alternative approached including continuing current policies and accepting the resulting adverse impacts on quality of life; increasing road capacity and parking facilities; and promoting sustainable transport alternatives to the above.

Strong public support has been offered for the sustainable transport option although there is a debate over the adverse environmental impacts that will be generated by expansion of the airport’s role and its function in supporting the City’s aspirations to improve connectivity with the wider world.

An important component of the new transport preferred options is the focus on improved public transport links between the City and its eastern corridor to serve the intended growth areas of Sherford and Plymstock Quarry.

c) Revised SEA/SA Assessment

LTP2

Proposals recommended in the LTP are generally supportive of the sustainability objectives, however there are still likely to be uncertain effects and the points listed below echo many issues raised within the first appraisal of potential effects of the issues and options for the Core Strategy on Transport (included in Volume 3 Appendices, July 2005):

- Materials for new infrastructure works should be sourced locally to reduce vehicular movements. Recycled and secondary materials should be used in construction and opportunities should be explored to reduce energy consumption, through for example solar signage.

- Proposals relating to the High Quality Public Transport Network, transport hubs and facilities for freight transfer by sea may give rise to areas of concern in terms of their sustainability. Proposals may result in the loss of green space, increase flood risk, affect biodiversity, historic and archaeological sites and the surrounding built environment as well as impact on communities’ quality of life and adjacent land uses in close proximity to proposals.

- Whilst a positive approach has been taken towards sustainable transport, it is important to question whether enough is being done to encourage a modal switch.

- Proposals to improve connectivity by road and air could increase the vehicular movements and the demand for air travel.

Emerging Eastern Corridor Strategy

This Eastern Corridor Study focused on the sustainable transport measures required to achieve the delivery of the planned long term growth in
Plymouth’s eastern areas. Proposals should meet the sustainability objectives, for example, through addressing community severance and improving air quality in the East End, reducing congestion and providing a high quality viable public transport system that encourages modal shift. However, some uncertainty exists over the exact location of proposed routes (i.e. new access to the port, a new southern road to the City Centre from Plymstock and new waterfront route to Marsh Mills from Plymstock) and their environmental impacts. This is a matter for the next stage in the process of developing the detailed transport proposals. It will however be important for the Council to ensure a high quality of proposal along the waterfront. It is acknowledged that the site is currently of very poor visual quality with derelict sites and a poor urban form. The transport proposal should be designed such as to address these visual concerns. This can be achieved by a masterplanning approach which delivers high quality development and waterfront promenade associated with the new transport route. Subject to a flood risk assessment, the route should also provide for flood defences, which itself would bring sustainability benefits. Although the site is quite distant from Saltram Park, it will be visible to a certain degree, which re-emphasises the importance of addressing the visual impacts. Similarly new development proposals relating to the Park and Ride interchange proposed at Deep Lane to the east of Plympton St Maurice, off road sections of HQPT route and the widening of Laira Bridge could all have negative effects on the environment, and therefore careful attention needs to be paid to minimising the impacts through the design process.

Proposals which amend or re-prioritise routes need to consider the effects associated with through air and noise pollution on adjacent land uses and communities’ quality of life. In addition, by redirecting vehicular movements elsewhere, businesses may suffer from a loss of revenue/trade.

**Emerging strategy for Plymouth Airport**

The Plymouth Airport Study has considered two different options for runway extensions, a shorter one which can accommodate the next generation of turbo props and a longer one which can accommodate smaller jets. The study concluded that the shorter runway extension was the preferred option. It also considered whether there were other possible locations for an airport – but concluded that improving the existing site was the only viable option. Policy CS27 also involves infrastructure improvements to the airport including the decommissioning of the shorter runway, extensions of the terminal and redesign and enhancement of the engine testing facilities to reduce a source of noise pollution. The proposal is likely to result in significant positive benefits for the local economy and minimise travel to other regional airports. However, it is uncertain what of the cumulative effects will be and these will need to be assessed through an Environmental Impact Assessment as detailed proposals are developed. Other potential impacts that will need testing include potential visual impact through night glare, the impact of a larger airport apron, and the additional vehicular movements to and from the airport if a modal switch to alternative modes of transport cannot be achieved. These effects could potentially
impact on adjacent communities’ quality of life and health, and so appropriate assessments and mitigation will need to be planned.

Studies indicate that emissions released if a plane is full are less than those generated by vehicular movements of the same distance made by the equivalent number of people travelling alone in a car. Both modes of transport will result in carbon emissions, but there could be a net increase in emissions if increasing opportunities for air travel at Plymouth resulted in a net increase in demand for travel overall. This will clearly have to be balanced against the wider economic and sustainability benefits for Plymouth and the far south west of a city which optimises its economic potential, and provides major opportunity for sustainable population growth as part of the regional and national sustainable communities’ agenda.

The Revised Core Strategy Strategic Objective

The Revised Core Strategy Strategic Objective and strategic diagram strongly supports Plymouth’s aim of achieving a “sustainable” city. However to achieve the many of the proposals, some of which are outlined above and particularly an integrated sustainable transport programme, issues relating to investment, phasing and educational awareness will need to be resolved.

The SA considers that impacts associated with climate change and pollution will still remain and these will have to be carefully considered against the economic value of an expanded airport. Whilst Plymouth’s aim is to achieve a “sustainable city” and the SEA team accepts that Plymouth should not forego opportunities for economic growth, Plymouth should work with partners regionally and nationally to achieve a reduction in carbon emissions.

The success of the Strategy cannot be truly evaluated until proposals following Environmental Impact Assessments are put in place and their impacts monitored.

3.114. **Transport:** Reference is made to the provision of green travel plans in Policy CS28 within the Submission Draft of the Core Strategy and further information is provided on the creation of safe walking and cycling routes, improvements in connections and links between communicates and recreational areas in the city and beyond. In addition further information on car parking standards redresses earlier concerns outlined above.

3.115. **Connectivity:** The conclusions written in the table above within regard to connectivity and particularly the airport expansion still remain valid.

Revised comments from Plymouth Council

**LPT2:**

Plymouth council suggest that Strategic Objective 12 will safeguard local materials which may be used for new infrastructure

Concerns about sustainability issues in relation to the High Quality Public
Transport Network, transport hubs and facilities for freight transfer by sea should be addressed in Strategic Objective 14

Policy CS28 - Local Transport Considerations encourages a modal shift

Proposals to improve connectivity by road and air could increase the vehicular movements and the demand for air travel – See Strategic Objective 14.

**Eastern Corridor Study**

The council points to Policy CS27 - Supporting Strategic Infrastructure Proposals in relation to minimising impacts through the design process

Policy CS22 – Pollution states that development proposals will be refused where they are likely to cause unacceptable noise, nuisance or light pollution.

**Plymouth Airport**

Environmental Impact Assessment and assessment of visual and other effects of the airport infrastructure improvements will be carried out in accordance with Policy CS27 Supporting Strategic Infrastructure Proposals.

**The Revised Core Strategy Strategic Objective**

Issues relating to investment, phasing and educational awareness are considered in more detail within the Summary document of LTP, Explanations on the web, the Public transport marketing strategy and a city-wide secondary schools competition.

The council suggests that impacts of airport expansion in terms of greenhouse gas emissions and pollution are mitigated in Strategic Objective 14 as far as possible

Plan must be read in conjunction with Regional Spatial Strategy and other Strategies of the City Council that address reductions in carbon emissions.

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**COMMUNITY HEALTH, SAFETY, WELL BEING & SOCIAL INCLUSION**

**Evolution of the Core Strategy:**

3.116. This section of the Submission Draft of the Core Strategy sets the context and Plymouth City Council’s approach to health, safety and well being. It includes a set of specific goals, relating to the above and some targets including:

- a reduction in the percentage of Plymouth’s residents and visitors who feel unsafe outside on the streets by day or night
- delivery of new investment in healthcare provision

3.117. Three specific policies included under this section relate to:

- Policy CS30 - Sport, Recreation and Children’s Play Facilities;
• Policy CS31 - Health Care; and
• Policy CS32 - Designing Out Crime.

SA/SEA Findings

3.118. The SA/SEA review, June 2005 stated that the Core Strategy seeks to create sustainable districts and local neighbourhoods, where all communities have good access to health care facilities and services, to good quality homes, feel safe and where access for all is encouraged. As the Core Strategy Preferred Options Report states “health, wellbeing and safety are all interrelated.”

3.119. Improvements in the quality of facilities and services and access to such services and facilities (health care, child care, sport and informal/formal recreation and good housing and high quality design) will have a positive effect on improving healthy lifestyles, communities’ quality of life and reducing crime levels. This will in turn instil confidence in existing and prospective businesses to relocate to the area, should encourage community integration and participation and overcome social exclusion and deprivation. As “Our City’s Health” strategy indicates, the most important determinant of good and bad health is poverty and deprivation. Proposals in the strategy tie in with the Core Strategy options seeking to:

• overcome isolation through improvements in public transport,
• improve the quality of housing, public and green spaces,
• tackle poverty through improved insulation (lifetime home standards),
• Reduce levels of unemployment,
• Improve literacy and numeracy,
• Achieve minimise standards from drinking water,
• Improve on vehicular exhaust emission standards.³

3.120. Potential negative effects of the proposals relate to an erosion of landscape character, biodiversity, archaeology and heritage in relation to new sites for primary health care, and sports/recreational facilities. In addition, it is unclear from the proposal whether a clear assessment of future need and demand has been undertaken as part of the Sports Facilities or Playing Pitch Strategies and whether this accords with Government Guidelines in PPG 17.

3.121. A full assessment needs to be undertaken of future demand based on predicted housing and employment land allocations within parts of the City. In addition it will be important to ensure that all large formal sports facilities are linked to the public transport network and are accessible by improved cycle routes and footpaths.

³ Out City’s Health – A framework to inform, influence and challenge partners to improve health and well being and reduce health inequalities across Plymouth, Plymouth Public Health Development Unit, 2005
### Community Health, Safety, Well Being and Social Inclusion: Revisions to the SEA/SA

#### a) Comments on the SEA/SA

The Council aims to address the potential negative effects on landscape, biodiversity and archaeology, of finding sites for new facilities through mitigation in the general policies regarding the environmental impacts of development.

The Council states that the requirements of PPG17, in particular providing an assessment of future need for sports/playing pitches will be met by Plymouth’s Playing Pitch Strategy 2006-16.

The Council is assessing local needs through Sustainable Neighbourhood Assessments currently being prepared.

#### b) Nature of Revisions to the Preferred Option

Although no key changes were proposed to the Preferred Options 30-36 in relation to this section, the text of the preferred options has responded to a number of uncertainties raised by the SEA.

#### c) Revised SEA/SA Assessment

The proposed revisions to preferred options will have no material impact on the conclusions already reached in relation to this topic.

3.122. Based on the previous reviews, we have no reason to consider that the revised policies have been significantly altered.

### Revised comments from Plymouth Council

Policy CS30 Sport, Recreation and Children’s Play Facilities in conjunction with Strategic Objective 11 states that development proposals will be permitted only where there is no demonstrable harm from noise, lighting, transport or environmental impacts. The council suggests that this should mitigate impacts to the landscape, biodiversity and heritage caused by development.

Assessment of future requirements for sports/recreational facilities has been undertaken as part of the emerging Parks and Greenspace Strategy, the Sports Plan 2020, and the emerging Sports Facilities Strategy and Playing Pitch Strategy.

Policy CS30 states that development must be accessible by sustainable transport modes.

### PLANNING OBLIGATIONS

3.123. The Submission Draft of the Core Strategy expands on this section, providing further information to set the context. It should be noted that references is made to the need to provide a SPD to “amplify the policy, identify priorities and assist in speeding up
the processes of preparing the agreements”. The Policy framework under this section has been expanded and now consists of two Policies:

- Policy CS33 – Community Benefits / Planning Obligations
- Policy CS34 – Planning Application Considerations

SA/SEA Findings

3.124. The SA/SEA June, 2005 review considered that this proposal is positive in terms of generating opportunities to support affordable housing, education provision, access, local labour/training initiatives, nature conservation, public area, public realm works and recreation including the provision for open space, sports and recreation. However, in practical terms it is not possible to test the proposal itself against the Sustainability Objectives without knowing details of the measures to be taken.

3.125. In addition, in is recommended that Policy CS34 is expanded to contain a further two general development control objectives relating to Cultural Heritage and Public Transport

3.126. In reviewing the proposal, it is considered that the City Council should monitor where monies generated from Section 106 agreement are invested to ensure that they are evenly distributed and meet demand within key locations throughout the City.

### Section 106 Obligations: Revisions to the SEA/SA

a) **Comments on the SEA/SA**

   No specific comments have been made by the City Council on the findings of the SEA/SA outlined in the preceding paragraphs.

b) **Nature of Revisions to the Preferred Option**

   No changes have been made to this section of the Preferred Options.

c) **Revised SEA/SA Assessment**

   Section 106 agreements will be monitored by a dedicated Section 106 Officer at Plymouth City Council. This should serve to help ensure that they are evenly distributed and meet demand with positive results for sustainability.

3.127. The SA/SEA of the Submission Draft of the Core Strategy considers that concerns regarding the need to ensure that monies through Section 106 agreements are evenly distributed and meet the demand within key locations is sufficiently addressed through the inclusion of an additional policy which states:

“make a positive contribution to delivering the City Vision, as articulated in the Core Strategy, and to creating a city of sustainable linked communities.”
4. MONITORING FRAMEWORK

4.1. The SEA Directive requires that the significant environmental effects of implementing a plan or programme should be monitored in order to 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.

4.2. 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.

4.3. 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.

4.4. 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.

4.5. 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.

4.6. 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.

**Suggested monitoring regime for the Plymouth SEAs**

- Determination of the scope of monitoring;
- Identification of the necessary information;
- Identification of existing sources of information;
  - Data at project level;
  - General environmental monitoring;
  - Other data;
- Filling the gaps;
- Procedural integration of monitoring into the planning system;
- Taking remedial action.

_European Commission (2003)_

4.7. 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