SEA/SA

of
Preferred Options for

MILLBAY/STONEHOUSE
Area Action Plan

Volume 2

Prepared for
Plymouth City Council

by

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and TRL

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1. STATUS OF THE REPORT

Introduction

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

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

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

Previous Appraisals and Assessments

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

- Transforming the vacant docks is a positive opportunity to provide employment and revitalise the area, however such proposals need to be carefully handled to ensure that the design is sensitive to industrial heritage, development proposals do not impact on water quality and aquatic habitats and that new employment opportunities generated provide jobs for the local community.

- Achieving sustainable urban communities is a positive approach to future planning. However in recreating and restoring residential areas it is important that housing stock and types meets the needs of a 21st century community and that the design of buildings is sensitive to the surrounding built environment, reflect/retains locally distinctive features and is designed to minimise energy consumption and waste generation.

- The question arises...will the proposals to introduce sensitive design and increase pedestrian and cyclist usage reduce crime, prostitution and increase safety or should additional/alternative solutions be explored?

- It is important when considering the nature of proposals to ensure that materials for construction are sourced locally where possible and the number of vehicular movements is reduced.

- Proposals to create/enhance attractive streetscapes is a positive opportunity to rejuvenate an area, however impacts associated with late opening hours, noise and rowdy behaviour will have to be carefully handled to ensure that the evening economy does not impact unreasonably on the quality of life of adjacent communities

- Whilst proposals to create a mix of housing types and stock should meet the needs of the local community there are likely to be some practical and economic constraints in achieving the required levels of affordable housing.

- Proposals relating to the creation of a marina and cruise liner berth and terminal will draw in visitors to the area. Consideration should be given as to how visitors will travel into the city centre, whether there is a need for tourist accommodation and what potential impact an increase in visitor numbers may have on the community, local services and shops.

- Proposals relating to the relocation of Plymouth Pavilions facilities to Central Park must be carefully considered. The loss of the leisure entertainment centre could have a negative economic impact on the area.
2. **APPRAISAL OF THE PREFERRED OPTIONS FOR MILLBAY/STONEHOUSE AREA ACTION PLAN**

**Introduction**

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

**Appraisal of the Preferred Options for the AAP**

2.2. An appraisal of the Preferred Options was split into two sections, firstly a review of the SA Objectives against the principles of the Area Action Plan and secondly a more detailed appraisal of the preferred options.

**Reviewing the SA Objectives against the Preferred Option Principles**

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

- In developing preferred options it will be important to ensure that the character of area of both Stonehouse and Millbay is not lost, including the area’s importance for its military heritage, the dockside working environment and key landmark features many of which in need of restoration.
- Achieve high quality design which adheres to sustainable development principles. The design and construction of buildings should seek to reduce energy and water consumption, source materials locally and use where possible secondary materials.
- Proposals should seek to ensure that existing communities are not driven out by compulsory purchase orders and that they are not “out priced” of the housing market; a range of housing stock and type needs to be made available.
- The preferred options need to ensure that if existing employment is displaced, businesses do not suffer.
- Achieving an attractive, vibrant environment should rejuvenate the area and result in increase employment opportunities, however the type of industries on offer, late night opening and the potential for associated anti social behaviour will have to be carefully balanced against the quality of life within the local community.
- Proposals should seek to support local employment opportunities during construction and implementation.
<table>
<thead>
<tr>
<th>Table 1 SA of Preferred Options</th>
<th>Millbay Principles</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>SA Objectives</strong></td>
<td><strong>Millbay Principles</strong></td>
</tr>
<tr>
<td><strong>Biodiversity</strong> – Biodiversity and landscape are properly valued, conserved and enhanced</td>
<td>A network of clearly identifiable neighbourhoods, each with their own unique character and local centre</td>
</tr>
<tr>
<td><strong>Pollution</strong> – Pollution is limited to levels which do not damage natural systems</td>
<td>A vibrant Union street that lives up to its past, stitching together Millbay and Stonehouse and providing a quality urban street linking the suburbs within the City Centre</td>
</tr>
<tr>
<td><strong>Climate Change</strong> – Emissions contributing to climate change are reduced and adaptation measures are in place</td>
<td>A stunning high quality contemporary waterfront, with good quality and well maintained buildings, positive streetscape and well defined and accessible open spaces</td>
</tr>
<tr>
<td><strong>Resources</strong> – Demands on natural resources are managed so that they are used as efficiently as possible</td>
<td>An attractive and convenient link between Millbay and the City Centre</td>
</tr>
<tr>
<td><strong>Energy</strong> – Efficient use of energy</td>
<td>A neighbourhood that is well connected to its surroundings with safe and attractive pedestrian routes and served by frequent and reliable public transport services</td>
</tr>
<tr>
<td><strong>Waste</strong> – Waste is minimised and, wherever possible, eliminated</td>
<td>A neighbourhood with a connected network of streets</td>
</tr>
<tr>
<td><strong>Economy</strong> – A diverse and thriving economy</td>
<td>A neighbourhood with a distinctive identify together with positive city landmarks</td>
</tr>
<tr>
<td><strong>Work and Incomes</strong> – Everyone has access to satisfying and fairly paid work and unpaid work is valued</td>
<td>A safe and attractive environment, which makes the most of its natural and historic assets and has a strong sense of community and provides appropriate community facilities</td>
</tr>
<tr>
<td><strong>Local Needs</strong> – Wherever possible, local needs are met locally so support local economies</td>
<td>A mixed use area with employment opportunities, local services, quality housing and attractive places to socialise</td>
</tr>
<tr>
<td><strong>Health &amp; Well-being</strong> – Promoting everyone’s physical and mental well being</td>
<td></td>
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<tr>
<td><strong>Learning</strong> – Everyone has access to lifelong learning, training opportunities, skills and knowledge</td>
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<tr>
<td><strong>Safety</strong> – Everyone is able to live without fear of crime or persecution</td>
<td></td>
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<tr>
<td><strong>Distinctiveness and Cultural Heritage</strong> – Diversity and local distinctiveness and cultural heritage are valued, protected and celebrated</td>
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<tr>
<td><strong>Leisure</strong> – Opportunities for culture, leisure and recreation are provided widely</td>
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<tr>
<td><strong>Transport and Access</strong> – Offering inclusive access to all service, including access for those without a car</td>
<td></td>
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<tr>
<td><strong>Basic Needs, Equality and Diversity</strong> – Ensuring community cohesion, tolerance, understanding and equality of opportunity</td>
<td></td>
</tr>
<tr>
<td><strong>Democracy</strong> – All sections of the community are empowered to participate in decision making</td>
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Appraisal of each Preferred Options

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

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

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

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

**Cumulative/secondary and synergistic effects:** Identification of potential cumulative, secondary and synergistic effects through implementing development following the policies in the plan.

**Mitigation:** Measures where possible will consider how the effect can be avoided through conditions or changes in the way in which it is implemented. Measures will consider alternatives, the refinement of the policy, additional policies or policy criteria to reduce the impact and/or supplementary planning guidance. Where there are proposals mitigation measures can be more specific.

| Table 2: SA of Preferred Options |
|----------------------------------|----------------------------------------|
| **Preferred Option**             | **Sustainability Objectives**          |
|                                  | Biodiversity                          |
|                                  | Climate Change                        |
|                                  | Resources                              |
|                                  | Energy                                 |
|                                  | Waste                                  |
|                                  | Economy                                |
|                                  | Work and Incomes                       |
|                                  | Local Needs                            |
|                                  | Health and Well being                  |
|                                  | Learning                               |
|                                  | Safety                                 |
|                                  | Distinctiveness and cultural heritage  |
|                                  | Leisure                                |
|                                  | Transport and Access                   |
|                                  | Basic Needs, Equality and Diversity    |
|                                  | Democracy                              |
| 1: Boulevard link to the City Centre from Millbay | 1 | ? | ? | 1 | ? | ? | 2 | 2 | 2 | 1 | 2 | 1 | 1 | 1 | ? | 1 | 2 |
| 2: Trinity Pier | ? | ? | ? | 1 | ? | ? | - 1/1 | 2 | 0 | ? | 0 | 0 | 1 | 0 | ? | 1 | 0 |
| 3: New Primary | ? | ? | 0 | ? | ? | ? | 1 | 1 | 0 | 0 | 2 | 0 | ? | ? | 1 | 2 | 1 |
### Key Findings

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

**Option 1 – Boulevard Link to the City Centre from Millbay**

2.6. **Strengths:** The Boulevard link includes proposals to improve the diversity of land uses, facilities and services, create a focus for the local community which will turn have a positive effect on local employment opportunities, landscape, cultural and historical environment, local needs and enhance communities’ quality of life. It provides an important link between two areas of Plymouth which are perceived through the road infrastructure and existing land uses to be disintegrated.
2.7. **Weaknesses:** The relocation of the Pavilion facilities to Central Park could have a negative impact on the local economy and the local labour force, however this is countered by the availability of new employment land and the retention of an arena/conference centre. Minor negative effects associated with air and dust pollution will be generated during the construction phase.

2.8. **Timescale:** Medium to long term (over the next 15-20 years) due to the time taken for development briefs to be prepared, proposals to come forward and construction to occur.

2.9. **Likelihood:** High – The proposals is critical to the MBM vision and urban renaissance agenda.

2.10. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** Clear development principles incorporating high quality design and the design and use sustainable design and construction techniques to accompany development briefs for this area of the city. It should seek to:
- Design out crime
- Encourage the reuse of construction and demolition of waste materials in new development
- A reduction in energy and water consumption
- Waste minimisation through storage of waste for recycling

**Option 2 – Trinity Pier**

2.11. **Strength:** Trinity Pier includes proposals to improve the existing infrastructure and enhance the built environment both in terms of the public realm and buildings. The proposal will generate positive impacts on the built environment, reuse of existing structures and previously used land. Through enhancement works, the proposal should draw further investment, attract business and employment opportunities.

2.12. **Weaknesses:** Negative effects are associated with air and water pollution from a potential increase in shipping movements. Minor negative effects associated with air and dust pollution will be generated during the construction phase and there may be uncertainties associated with risks to aquatic habitats and species through increased shipping movements (although full impacts and mitigation measures will be considered through a detailed assessment of the marine environment).

2.13. **Timescale:** Medium to long term (over the next 15-20 years) due to the time taken for development briefs to be prepared, proposals to come forward and construction to occur.

2.14. **Likelihood:** High – Works have already been undertaken to facilitate access by the cross channel ferries.

2.15. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** Clear development principles incorporating high quality design and the design and use sustainable design and construction techniques to accompany
development brief for the proposed terminal building and adjacent infrastructure. It should seek to:

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

2.16. Measures need to be put in place to ensure that water pollutants are filtered before reaching the Sound. The potential impact to local businesses needs to be reviewed and appropriate measures in place to compensate for any potential loss to their viability.

Option 3 – New Primary School

2.17. **Strengths:** This proposal should have a positive effect on the attainment of higher educational qualifications both at a primary school level and for adult learning, it could act as an important focus for the local community through the provision of additional facilities and lies in close proximity of the main residential catchment areas and footpaths.

2.18. **Weaknesses:** It is assumed that the location of the new school will address concerns over two minute walk catchment areas. Minor negative effects associated with air and dust pollution will be generated during the construction phase.

2.19. **Timescale:** Medium to long term (over the next 15-20 years) due to the time taken for development briefs to be prepared, proposals to come forward and construction to occur and the availability of the site and section 106 contributions.

2.20. **Likelihood:** High.

2.21. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** Clear development principles incorporating high quality design and the design and use sustainable design and construction techniques to accompany development brief for the proposed school and adjacent infrastructure. It should seek to:

- Encourage the reuse of construction and demolition of waste materials in new development
- A reduction in energy and water consumption
- Waste minimisation through storage of waste for recycling
- Reflect high quality design and enhance the streetscape frontage

Option 4 – Marine Sciences and Technology and marine related employment

2.22. **Strengths:** This proposal should have a positive effect on the local economy and generate employment opportunities during construction and implementation. In addition it could offer the potential for education at graduate/post graduate level through the development of the marine and technology centre. Minor negative
effects associated with air and dust pollution will be generated during the construction phase.

2.23. **Weaknesses**: Proposals relating to boat building or other marine related employment such as Princes Yacht finishing plant need to ensure that adequate health and safety measures are in place to mitigate risks associated with air and water pollution, damage to aquatic habitats and associated species and potential impact on neighbouring land uses. This proposal should seek to encourage sustainable construction techniques including the reuse of construction and demolition materials in place of primary resources and design of encourage environmental management practices including recycling facilities. It is questionable as to whether potential employees will be local given the lower percentage of people within the community with degree qualifications and the provision of high income jobs.

2.24. **Timescale**: Medium to long term (over the next 15-20 years) due to the time taken for development briefs to be prepared, proposals to come forward, availability of the sites and construction to occur.

2.25. **Likelihood**: High.

2.26. **Recommendations for mitigation of adverse effects and/or enhance or positive effects**:

Clear development principles incorporating high quality design and the design and use sustainable design and construction techniques to accompany development brief. It should seek to:

- Encourage the reuse of construction and demolition of waste materials in new development
- A reduction in energy and water consumption
- Waste minimisation through storage of waste for recycling
- Reflect high quality design and enhance the streetscape frontage
- Large developments proposals should include green travel plans

**Option 5 – The Arena**

2.27. **Strengths**: This proposal should support the local economy and generate new employment opportunities, albeit slightly different to those offered through the Pavilion facilities.

2.28. **Weaknesses**: This proposal should seek to encourage sustainable construction techniques including the reuse of construction and demolition materials in place of primary resources and design of encourage environmental management practices including recycling facilities. In addition it should reflect high quality design and complement the waterfront skyline. The development should be sensitive to adjacent land uses and mitigate against impacts associated with late opening hours.

2.29. The proposal should seek to reduce car parking provision, encourage alternative modes of transport through the development of green travel plans and minimise against traffic congestion. Minor negative effects associated with air and dust pollution will be generated during the construction phase.
2.30. **Timescale:** Medium to long term (over the next 15-20 years) due to the time taken for development briefs to be prepared, proposals to come forward and construction to occur.

2.31. **Likelihood:** Medium to high.

2.32. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** Clear development principles incorporating high quality design and the design and use of sustainable design and construction techniques to accompany development brief for the proposed school and adjacent infrastructure. It should seek to:

- Encourage the reuse of construction and demolition of waste materials in new development
- A reduction in energy and water consumption
- Waste minimisation through storage of waste for recycling
- Reflect high quality design and enhance the streetscape frontage

The proposal needs to consider alternative transport solutions to access the arena.

**Option 6 – East Quay**

2.33. **Strengths:** This proposal will have a positive effect on the surrounding landscape, skyline and public realm. It should encourage a diversification in employment and will create a mix of employment opportunities through retail, B1 and small workshops. Measures to enhance public access and promote water transport should enhance people’s sense of well being and promote healthier lifestyles.

2.34. **Weaknesses:** The proposal states that “there will be a range of mixed uses to give the area a vibrancy and activity at all times of the day”, care needs to be taken to ensure that the evening economy does not impact unreasonably on the quality of life of adjacent communities. The 25% target for affordable housing will clearly have important benefits in terms of alleviating local housing shortage, but this represents a minimum and every effort should be made to increase housing provision to meet local need. Future use of decontaminated sites must be carefully considered and measures taken to prevent water pollution. Minor negative effects associated with air and dust pollution will be generated during the construction phase.

2.35. **Timescale:** Medium to long term (over the next 15-20 years) due to the time taken for development briefs to be prepared, proposals to come forward and construction to occur.

2.36. **Likelihood:** Medium to high.

2.37. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** Opportunities should be explored through development brief to promote sustainable design, reducing energy and water consumption, reuse and sourcing of local materials. Local authorities through section 106 agreements should seek to
ensure that at least 25% of affordable housing is achieved in order to achieve a mix of housing stock and type. Proposed land uses and subsequent changes in land use must be carefully monitored to ensure that cumulative impacts associated with late opening uses do not impinge on adjacent communities. Ensure through development proposals that local jobs are protected alongside the development of training schemes to enhance the local skills base.

**Option 7 – Reinvigoration of Union Street**

2.38. **Strengths:** The proposal should result in significant improvements to the urban frontages and streetscape generating strong visual links where possible with the remainder of the city founded on work through the Townscape Heritage Initiative and reflects local distinctiveness. In addition it will improve the quality of existing housing stock compatible with 21st century living which will have a positive effect on communities’ health and well being. The proposal will encourage a diverse range of employment opportunities and should seek to overturn low employment rates.

2.39. **Weaknesses:** It is uncertain whether the proposal will have a beneficial effect on air pollution since Union Street forms one on the key vehicular routes through the City. This option should through sustainable construction techniques seek to reduce energy consumption through CHP, double glazing and insulation complying with Building Regulations. It should encourage sustainable construction techniques including the reuse of construction and demolition materials in place of primary resources and seek to minimise waste production. Although the proposal indicates that there will not be a net increase of night clubs, and further late night uses will be limited, care needs to be taken to ensure that such land uses are contained and future proposals are monitored to prevent cumulative impacts associated with anti social behaviour arising. Minor negative effects associated with air and dust pollution will be generated during the construction phase.

2.40. **Timescale:** Medium to long term (over the next 15-20 years) due to the time taken for development briefs to be prepared, proposals to come forward and construction to occur.

2.41. **Likelihood:** High

2.42. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** Work through the Townscape Heritage Initiative should provide the foundation for further investment within the location. The area would benefit from a coordinated design brief to achieve high quality design which will assist in instilling greater planning certainty and investor confidence and generates high quality businesses premises. The brief should advocate the use of sustainable design and construction techniques to accompany development briefs for this area of the city. It should seek to:

- Design out crime
- Encourage the reuse of construction and demolition of waste materials in new development
- A reduction in energy and water consumption
- Waste minimisation through storage of waste for recycling
2.43. Opportunities for public participation through consultation on development briefs and future concept statements should be encouraged.

2.44. One of the overarching principles for this AAP seeks to allow on street car parking, a detailed assessment needs to be undertaken to determine whether this is appropriate on one the main arterial roads and result in traffic congestion.

**Option 8 – Stonehouse Creek Site (School)**

2.45. **Strengths:** Proposals strongly support the opportunity to increase the quality of education in the area and could support adult learning, training and community interaction. In addition school facilities could double up as outdoor leisure facilities for the neighbouring community if sensitively managed.

2.46. **Weaknesses:** It is important to ensure that adequate public transport services are provided and there are well lit, safe cycle routes and footpaths for children. The design of the building must reflect sustainable building standards and seek to reduce energy and water consumption and minimise waste generation. Materials should be sourced locally and where possible be secondary materials. Minor negative effects associated with air and dust pollution will be generated during the construction phase.

2.47. **Timescale:** Medium (15 years) due to the time taken for site to become available development brief to be prepared and construction to occur.

2.48. **Likelihood:** High.

2.49. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** Clear development principles incorporating high quality design and the use of sustainable design and construction techniques to accompany the development brief. It should seek to:

- Encourage the reuse of construction and demolition of waste materials in new development
- Reduce energy and water consumption
- Waste minimisation through storage of waste for recycling

2.50. Appropriate infrastructure needs to be developed to ensure that there are alternative means of transport to school other than by car.

**Option 9 – The Palace Theatre**

2.51. **Strengths:** This proposal strongly supports sustainability objectives seeking to maximise the lifespan of existing buildings and broadening accessibility to historic buildings and improving the quality of the urban frontage. Improvements should have synergistic effects on the surrounding area including enhancement work to the public realm.
2.52. **Weaknesses:** Through improvement works the proposal should seek to minimise energy and waster consumption, bearing in mind the opportunity to make significant changes to the internal structure may be limited by the building’s designation.

2.53. **Timescale:** Short term (5 years).

2.54. **Likelihood:** High – The building acts as a strong focal point and landmark

2.55. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** Where possible the proposal should aim to adhere to sustainable design practices.

**Option 10 – Royal William Yard**

2.56. **Strengths:** This proposal strongly supports sustainability objectives seeking to protect local distinctiveness and cultural heritage as well as the reuse of the existing building. In addition this proposal could provide the opportunity to generate a diverse range of employment and job opportunities covering a range of income levels.

2.57. **Weaknesses:** There will be short term impacts associated with air and noise pollution. Although the proposal states that the yard should not become a “privated, gated community” the interrelationship of public and private space will have to be carefully handled to ensure that concerns of crime and anti social behaviour are overcome. Clarification is required on the quantity of parking provision per household.

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

2.59. **Likelihood:** High.

2.60. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** Development proposals need to consider measures to minimise energy and water consumption, and encourage recycling whilst ensuring that proposals do not conflict with the integrity of the building. Proposals should seek to minimise the availability of car parking spaces and encourage alternative uses of transport.

**Option 11 – The Grain Silo**

2.61. **Strengths:** The proposal recognises the structure as significant landmark feature which forms an important part of the skyline and seeks to reuse an existing structure.

2.62. **Weaknesses:** It is uncertain from the proposal whether there will be any issues associated with contamination and water pollution associated with the structure. In addition, any proposal should seek to minimise car parking provision and explore opportunities to link to the public transport network or water transport service. In the design and implementation of new works, future proposals should seek to reduce water and energy consumption.
2.63. **Timescale:** Long term (over the next 15-20 years) due to the time taken negotiate with MoD and ABP port operators, prepare a development brief, consider proposals and construction to occur.

2.64. **Likelihood:** Medium.

2.65. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** Development proposals need to consider measures to minimise energy and water consumption, and encourage recycling whilst ensuring that proposals do not conflict with the integrity of the building. Proposals should seek to minimise the availability of car parking spaces and encourage alternative uses of transport. A full risk assessment covering issues associated with land contamination and existing impacts of water quality need to be undertaken as well as the stability of the structure itself.

**Option 12 – Harwell Street**

2.66. **Strengths:** The proposal strongly supports the opportunity to provide a variety of housing stock and types to meet all needs in addition to reflecting locally distinctive characteristics and enhancing the public realm. Through sensitive design crime levels and anti social behaviour should be minimised.

2.67. **Weaknesses:** Residential development should seek to reduce energy consumption and waste generation through the provision of recycling facilities. In addition the design of buildings should consider opportunities to source local materials thereby reducing vehicular trips and using where possible secondary aggregates. Proposals should be seek to minimise car parking provision.

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

2.69. **Likelihood:** High

2.70. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** Whilst 20% of housing is seeking to adhere to lifetime home standards covering energy consumption, design proposals should also seek to:

- Design out crime
- Encourage the reuse of construction and demolition of waste materials in new development
- Reduce water consumption
- Minimise waste through recycling facilities

**Option 13 – Review of Conservation Areas**

2.71. **Strengths:** The proposal will strongly support the need to reflect and respect local distinctiveness and key historical and archaeological features through sensitive design, protecting and integrating frontages, reusing sensitively existing buildings and protecting their visual relationship and setting.

2.72. **Weaknesses:** None identified.
2.73. **Timescale:** Short term (over the next 1-5 years).

2.74. **Likelihood:** High.

2.75. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** The findings of the review should be reflected in development briefs for area.

**Conclusions and Recommendations**

**Conclusions**

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

2.77. Like other Area Action Plans, Millbay and Stonehouse Area Action Plan will be reliant on future investment, land negotiations and compulsory purchase orders. Care needs to be taken to ensure that throughout the phasing of development adequate facilities and services are available to meet the needs of the new community.

2.78. Development proposals are heavily reliant on the success of the new public transport system and it is critical that the infrastructure is in place and functioning. It is uncertain from proposals whether major development proposals will lie in close proximity of public transport routes and whether car parking provision for residential and employment land will be reduced. Particular care needs to be taken to ensure that the Arena and Trinity Pier are linked to the public transport network.

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

2.80. Potential negative issues which are highlighted throughout the review relate to the impact of developments on existing sites of nature conservation, landscape, heritage or archaeological importance, although risks assessments will be undertaken and mitigation measures in place. The AAP must also consider the visual impact of development proposals, particularly in relation to the waterfront.

2.81. Careful consideration needs to be given to the proximity of late night/evening land uses to adjacent communities.

2.82. The siting of development proposals adjacent to the River Tamar needs to respond to risks of flooding.

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

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

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

2.85. Focusing on the tourism potential for the area, opportunities should be explored to reap the benefits accrued from new proposals such as Trinity Pier and the Arena for the local community, exploring opportunities for visitor payback and community participation.

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

Recommendations

2.87. The following recommendations are suggested ways of improving the AAP and its relationship with the Core Strategy:

• Each development proposals and Area Action Plan should not be considered in isolation. The LDF needs to recognise that depending on the timing of proposals, implementation and funding streams impacts may occur on adjacent land uses which need to be mitigated.

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

• A detailed assessment of recreational carrying capacity based on the future population figures for the area needs to be undertaken in order to define limits
beyond which sites of nature conservation, landscape or archaeology will be suffer. Proposals must seek to recreate/enhance sites of nature conservation and landscape.

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

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

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

• Public transport infrastructure needs to be in place well in advance of new development occurring. It is important not only to influence this modal shift through residential development (i.e. minimising car parking provision) but also through major employers. All new large scale businesses should be required to submit green travel plans and commit some level of contribution/investment where development is not adjacent to the bus network to improve footpath and cycle route links. A contingency plan needs to be available to ensure that if people cannot be encouraged to make a modal switch potential issues relating to traffic congestion and air pollution can be resolved.

• A Design Guide should be produced for all development on the re-use of construction and demolition materials on site, e.g. through planning conditions requiring developers to provide a demolition plan and cover efficient water and energy use, reuse and sourcing of local materials as part of the sustainable construction and design guidance. Design proposals should consider opportunities to support renewable energy and sustainable urban drainage schemes. This commitment should not just be reflected in residential dwellings but also for large businesses through environmental management policies.
3. MONITORING FRAMEWORK

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

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

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

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

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

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

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

<table>
<thead>
<tr>
<th>Suggested monitoring regime for the Plymouth SEAs</th>
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<tbody>
<tr>
<td>• Determination of the scope of monitoring;</td>
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<tr>
<td>• Identification of the necessary information;</td>
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<td>• Identification of existing sources of information;</td>
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<tr>
<td>o Data at project level;</td>
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<tr>
<td>o Other data;</td>
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<tr>
<td>• Filling the gaps;</td>
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<tr>
<td>• Procedural integration of monitoring into the planning system;</td>
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<td>• Taking remedial action.</td>
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3.7. Ideally, the monitoring arrangements required for ensuring the delivery of sustainability objectives will be built into routine annual monitoring programmes for ensuring that all other aspects of the plan are on course.