SEA/SA

of
Preferred Options for

Devonport Area Action Plan
Non Technical Summary

Prepared for
Plymouth City Council

By

Land Use Consultants
and TRL

July 2005
1. NON TECHNICAL SUMMARY

Introduction

1.1. This report constitutes the non technical summary of the SEA/SA of the Preferred Options for Devonport Area Action Plan. It provides a brief overview of the key issues, options and conclusions. Detailed findings are included in the relevant SEA/SA report.

1.2. The Non Technical Summary has been prepared in accordance with advice on Sustainability Appraisal (SA) provided by the Office of the Deputy Prime Minister (ODPM) and procedures for SA set out in the Planning and Compulsory Purchase Act 2004. The Non Technical Summary also accords with the requirements of the Strategic Environmental Assessment (SEA) Directive.

1.3. The SA/SEAs are being submitted alongside the Preferred Options documents to provide the public and statutory consultees with the opportunity to express opinions on both sets of documents. After a period of consultation the full set of documents including DPDs and the SA/SEAs will be revised before they are submitted to the Secretary of State. An examination will then be held before an independent inspector to consider the soundness of the plans. It is anticipated that the Inspector’s report will be published in mid-2006 and the final Development Plan Documents will be adopted shortly after.

SA/SEA Stages

1.4. ODPM’s guidance specifies a number of stages of work which need to be undertaken. The following three stages have been completed:

Stage A: Setting context and scope

Stage B: Developing and refining options

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1.5. The scoping stage gathered information about other relevant plans, programmes, Plymouth’s characteristics and SA objectives and indicators. This work built on government policy for sustainable development, and work on sustainability objectives at regional and local level. The sustainability objectives used in the SEA/SA are presented in Table 1.

1.6. Appraisal of Issues and Options followed in the spring 2005 and resulted in an analysis of the sustainability strengths and weaknesses of the Core Strategy and each of the Area Action Plans (AAPs). These findings were published.

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1 Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks, Consultation Paper, ODPM, September 2003

2 European Directive 2001/42/EC
Table 1: Revised Headline SA/SEA Objectives

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<tbody>
<tr>
<td>1</td>
<td><strong>Biodiversity and landscape</strong> - are properly valued, conserved and enhanced</td>
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<td>2</td>
<td><strong>Pollution</strong> - is limited to levels which do not damage natural systems</td>
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<td>3</td>
<td><strong>Climate change</strong> – emissions contributing to climate change are reduced and adaptation measures are in place</td>
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<td>4</td>
<td><strong>Resources</strong> – Demands on natural resources are managed so that they are used as efficiently as possible</td>
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<td>5</td>
<td><strong>Energy</strong> – Efficiency use of energy</td>
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<td>6</td>
<td><strong>Waste</strong> – Waste is minimised and wherever possible eliminated</td>
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<td>7</td>
<td><strong>Economy</strong> – A diverse and thriving economy</td>
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<td>8</td>
<td><strong>Work and Incomes</strong>- Everyone has access to satisfying and fairly paid work and unpaid work is valued</td>
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<td>9</td>
<td><strong>Local Needs</strong>- Wherever possible, local needs are met locally to support local economies</td>
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<td>10</td>
<td><strong>Health and well being</strong>- Promoting everyone’s physical and mental wellbeing</td>
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<td>11</td>
<td><strong>Learning</strong> – Everyone has access to lifelong learning, training opportunities, skills and knowledge</td>
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<td>12</td>
<td><strong>Safety</strong> – Everyone is able to live without fear of crime or persecution</td>
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<td>13</td>
<td><strong>Distinctiveness and Cultural Heritage</strong> – Diversity and local distinctiveness and cultural heritage are valued, protected and celebrated</td>
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<td>14</td>
<td><strong>Leisure</strong> – Opportunities for culture, leisure and recreation are provided widely</td>
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<td>15</td>
<td><strong>Transport and Access</strong> – Offering inclusive access to all service, including access for those without a car</td>
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<tr>
<td>16</td>
<td><strong>Basic Needs, Equality and Diversity</strong> – Ensuring community cohesion, tolerance, understanding and equality of opportunity</td>
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<td>17</td>
<td><strong>Democracy</strong> – All sections of the community are empowered to participate in decision making</td>
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1.7. The potential social, economic and environmental effects of the preferred options for the Core Strategy and AAPs have been assessed against the SEA/SA objectives in the current reports. Potential mitigation measures have been proposed as well as measures for maximising beneficial effects. Proposals for future monitoring of the sustainability effects of the LDF are also included.

**Stage D: Consulting on the Plan and the SEA/SA Report**

1.10. Publication of this Non Technical Summary and the accompanying documents (which are listed below) marks the start of the formal consultation on the Plans and SEA/SA reports:
• The Core Strategy
• Devonport Area Action Plan
• Millbay/Stonehouse Area Action Plan
• North Plymstock Area Action Plan
• Waste Local Development Framework
These reports constitute the ‘environmental report’ under the SEA Directive.

Characterisation of Plymouth

1.8. The environmental baseline is described in detail in the individual SEA/SA reports. Plymouth is surrounded by landscape of national importance, including the Tamar Valley and South Devon AONBs and overlooked by Dartmoor National Park to the north. There is a wealth of nature conservation sites, designated for their biological or geological importance in and around the City. Sites include Plymouth Sound and Estuaries which are candidate Special Areas of Conservation, the Tamar Estuaries Complex, defined as a Special Protection Area as well as several SSSIs. Plymouth is extremely important in terms of its history and archaeological heritage, particularly its naval presence. The City suffered from the devastation of the World War Two resulting in radical and visionary post war plans to reclaim sites and reduce overcrowding. Plans for sub urban areas included the creation of open spaces through valleys with residential areas along the hillsides which are topped by industrial development, playing fields and schools. These changes have resulted in very distinctive areas ranging from the business sector and waterfront to outer suburbs of North Plymstock, Ernesettle and Mutley.

1.9. Plymouth has experienced waves of development; the defence sector which has traditionally been seen as an important source of employment and income alongside the manufacturing has declined, whilst the transport, communications and financial sectors have grown. There is a clear intention to revitalise the economy, promote economic activity, improve income levels and quality/availability of employment and establish an attractive city within which to live by concentrating on knowledge intensive sectors.

1.10. A relatively high proportion of Plymouth residents experience deprivation in terms of income, employment, access to services and health. Some measures of educational achievement in school and vocational qualifications are low. This may be associated with an outflow of younger people and the limited availability of jobs for highly qualified people.

1.11. Proposals for population growth, in line with the Mackay vision present major sustainability challenges ranging from the need to develop the economy and accommodate high levels of population, to providing the necessary infrastructure to meet increasing demands and improve quality of life whilst protecting the environment from increasing development pressure.
Summary of Findings

Appraisal of Issues and Options (Stage B)

1.12. The Issues and Options Paper relating to Devonport prepared by the Council was reviewed against the SA. A summary of the findings is outlined below.

1.13. Devonport Area Action Plan appears broadly sustainable although, inevitably, some conflict of interest may arise:

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

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

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

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

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

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

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

Findings of the Preferred Option (Stage C)

1.14. Devonport Area Action Plan generally strives to meet the range of sustainability objectives identified during the SA/SEA. However, there are some tensions and the findings and conclusions are summarised below.
1.15. Like other Area Action Plans, Devonport will be reliant on future investment, land negotiations and compulsory purchase orders. Care needs to be taken to ensure that throughout the phasing of development adequate facilities and services are available to meet the needs of the new community and conflicts with adjacent land uses are minimised. Examples of where potential conflicts may occur include; South Yard Heritage Centre (which it is hoped will be a major draw for visitors) and the site’s continuing use by the MoD (Option 3); issues relating to safety, health and security will be paramount.

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

1.17. 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.

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

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

1.20. Adequate remediation measures are required where MOD land is to be developed for housing. The siting of development proposals adjacent to the River Tamar needs to respond to risks of flooding.

1.21. 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?

1.22. 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?

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

1.24. 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.

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

• Each development proposals and Area Action Plan should not be considered in isolation.
• The LDF needs to recognise that depending on the timing of proposals, implementation and funding streams impacts may occur on adjacent land uses which need to be mitigated.
• Throughout the phasing of development, it is important to ensure that the community functions sustainability with adequate services, facilities and infrastructure to meet all needs.
• Alongside the open space audit, consideration should be given to the loss of open space and the availability of open space carefully monitored to ensure that provision accords with Government guidelines in PPG17.
• The Area Action Plan would benefit from more text describing the context of the proposals.
• In line with PPG25, flood risk will need to be assessed when deciding on specific locations for development, and Plymouth City Council should work with the Environment Agency to undertake a Strategic Flood Risk Assessment for the City, which could be drawn upon when assessing development proposals.

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

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

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

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

**Monitoring Implementation of the LDF:**

1.26. The final section of the SA Report sets out the recommendations for monitoring the significant sustainability effects of the implementation of the Plymouth LDF. The monitoring should measure indicators of a causal link between the LDF implementation and the effects ‘on the ground’. Possible indicators for each of the SA/SEA objectives are identified. It is recommended that Plymouth City Council work with the statutory environmental bodies and other authorities and stakeholders in Devon and the South West to agree indicators and share monitoring information.