

**SEA/SA
OF THE SUBMISSION DRAFT OF
THE
OF**

**NORTH PLYMSTOCK
Area Action Plan**

**Volume 2
(Revised July 2006)**

**Prepared for
Plymouth City Council**

By

**Land Use Consultants
and TRL**

July 2006

14 Great George Street
Bristol BS1 5RH
Tel: 01179 291 997
Fax: 01179 291 998
luc@bristol.landuse.co.uk

Table of Contents

- 1. Status of the report ----- 5**
 - Introduction 5
 - Previous Appraisals and Assessments..... 5
 - The Current Report 6
 - The Next Steps 6
 - Method of Approach in updating the SEA/SA..... 7
 - Presentation of Revised Information 7

- 2. Appraisal of the Preferred Options and Submission Draft for North Plymstock Area Action Plan ----- 9**
 - Introduction 9
 - Appraisal of the Preferred Options for the AAP 9
 - Reviewing the SA Objectives against the Preferred Option Principles -----9
 - Appraisal of each Preferred Options ----- 10
 - Appraisal of the Submission Draft..... 13
 - Policy NP 01: Plymstock (July 2005 Appraisal) 13
 - Policy NP 02: Pomphlett Industrial Estate (July 2005)..... 16
 - Policy NP 03: Wakehams Quarry (July 2005 Appraisal) 18
 - Policy NP 04: Billacombe Green (July 2005) 20
 - Policy NP 05: Sherford and Sports Hub (North Elburton) (July 2005) 21
 - Option 11: Elburton 21
 - Policy NP 06: Future Development Options North of Elburton and Policy NP 17: Land North of Hazeldene Quarry..... 23
 - Policy NP 07: High Quality Public Transport Route 25
 - Policy NP 08: Improvements to Public Transport Services in Plymstock.... 25
 - Policy NP 09: Highway Infrastructure Improvements and Traffic Management 25
 - Policy NP 10: National Cycle Network..... 25
 - Policy NP 11: Moorcroft Quarry (July 2005) 29
 - Policy NP 12: Countryside Park (July 2005) 30
 - Policy NP 13: Chelson Meadow Restored Landfill Site (July 2005)..... 32
 - Policy NP 14: Gateway Corridors and Waterfront Policies 34
 - Policy NP 15: Hazeldene Quarry – Minerals Development (July 2005) 35
 - Policy NP 16: Chelson Meadow Waste Management Centre (July 2005)..... 36
 - Conclusions and Recommendations 38

- 3. Monitoring Framework ----- 39**
 - Appendix I 41
 - Plymouth City Council Responses to previous SEA (Volume 2, Revision 1, July 2006) 41

I. STATUS OF THE REPORT

Introduction

- I.1. This report (**Volume 2 Revised July 2006**) concludes Stage C of the sustainability appraisal (SA) and strategic environmental assessment (SEA) LDF. It constitutes the Draft SEA Environmental Report and SA of the Submission Draft of the North Plymstock Area Action Plan (AAP), including Minerals Draft, (July, 2006). The original version of **Volume 2** and **Volume 1** comprising the SEA/SA Context Report were published in July 2005. Revisions to the SEA/SA to cover amendments to the North Plymstock AAP draft Preferred Options (Volume 2 Revision 1), was produced in June 2006.
- I.2. In addition to the review of preferred options for the Area Action Plan this report contains a reference to future monitoring requirements.
- I.3. A Non Technical Summary is provided with this Report.

Previous Appraisals and Assessments

- I.4. Plymouth City Council prepared a Preferred Options Report for the North Plymstock Area Action Plan in July 2005 and that document (together with the Preferred Options of the Core Strategy) was subjected to Stage C of the Strategic Environmental Assessment and Sustainability Appraisal (SEA/SA). An earlier exercise (Stage B of the SEA/SA) had been undertaken in the Spring 2005 in relation to issues and options for achieving the objectives of the LDF. Both of these stages of the SEA/SA assessed the sustainability strengths and weaknesses of the North Plymstock (and other) Area Action Plan(s). Those findings have been carried forward where relevant into the existing appraisal.
- I.5. The Submission Draft of the North Plymstock AAP June 2006 contains substantially more detail than the previous Preferred Options Report. In addition, the Preferred Options for the Core Strategy have been substantially revised (in April 2006 and July 2006). The revisions to the Core Strategy are reviewed in a separate document (SEA/SA of LDF Core Strategy - Volume 2 (Revised July 2006)).
- I.6. For the record, the July 2005 findings of SEA/SA comments on the Core Strategy references to North Plymstock AAP are repeated below for ease of reference.

The proposals for the North Plymstock Area Action Plan appear broadly sustainable although, inevitably, some conflict of interest may arise and these issues are raised through the following questions:

- *Achieving sustainable urban communities through the redevelopment of Plymstock Quarry is a positive approach to future planning. However in the design it is important that housing stock and types meets the needs of the local community, are affordable and that the design of buildings is sensitive to the surrounding built and natural environment and reflects/retains locally distinctive features.*

- *It is important to ensure that all new development proposals consider opportunities to source materials locally and through sustainable design, reduce energy and waste consumption.*
- *Proposals to redevelop on land adjacent to Moorcroft quarry and development adjacent to the existing waste management area (south west of Chelson Meadow) must consider the proximity of proposed development adjacent to quarry and potential impacts on the new community's quality of life e.g. noise from blasting and dust from air pollution.*
- *Any proposals resulting in the loss of Billacombe Green common land must consider the nature conservation importance of the land lost to development.*
- *Careful consideration should be given to cliff stabilisation and safety issues associated with site seclusion.*
- *Design proposals must consider the future management of the site and explore for example opportunities to compost and reuse grey water.*
- *Care needs to be taken to enhance the image of the waterfront position at Breakwater Employment Centre and ensure waterfront access by all is retained where possible.*
- *It is important in promoting employment growth that a wide variety of opportunities are available and the needs of the local community are met. Green travel plans should be considered alongside development proposals.*

The Current Report

- 1.7. 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 and targets and proposals contained in the Submission Draft of the North Plymstock Area Action Plan. The SEA/SA process has run concurrently with plan making and the authority of the local development framework have carefully considered the observations and recommendations of the SEA team in revising successive drafts of the AAP. The current report itself has been through a staged process, involving a commentary on the preliminary officers' draft and then the preparation of this report.
- 1.8. 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 AAP 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

- 1.9. The SEA/SA and Submission Draft of the North Plymstock Area Action Plan 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 adopted the North Plymstock Area Action Plan with any revisions or amendments specified by the inspector.

Method of Approach in updating the SEA/SA

- I.10. 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 subsequent revisions where practical,
 2. Examine the changes made to the Preferred Options carried forward into the Policies of the North Plymstock Submission Draft AAP (June 2006) and subsequent revision to that document (July 2006),
 3. Note the response of Plymouth City Council to those SEA/SA findings/recommendations where appropriate,
 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, and
 6. Provide a final commentary on the extent to which the revisions have enhanced or prejudiced the sustainability of the AAP.

Presentation of Revised Information

- I.11. 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. As the structure of the Area Action Plan has changed significantly from the Preferred Options, June 2005 contained in the earlier SEA/SA Report July 2006, the present report follows the order of the Policies of the AAP Draft Submission Report (July 2006). The text from the relevant Preferred Option, as discussed in **Volume 2** (July 2005), is presented in italics. Any changes to the Preferred Options, July 2005 which have been identified in the latest Policies are identified within the shaded box at the end of each Policy section.
- I.12. The Council's response and commentary to the previous SEA, **Volume 2 (Revision I)**, is presented in **Appendix I** at the end of this document. A summary of any issues relating to these responses, where appropriate has also been presented in boxes at the end of each Policy section. Further revisions to AAP in relation to the July 2006 Submission Draft Report where appropriate are presented within separate boxes below each section. In summary, the structure of each of the Policy sections within this report is as follows:

Box 1

- a) Revisions to the Submission Draft AAP (June 2006)
- b) Revised SEA/SA Assessment (June 2006)

Box 2

- c) Further revisions to the Submission Draft AAP (July 2006)
- d) Further revisions/recommendations in relation to SEA/SA of the latest July 2006 Submission Draft AAP **and** Commentary on Plymouth City Council's response to the previous SEA/SA.

2. APPRAISAL OF THE PREFERRED OPTIONS AND SUBMISSION DRAFT FOR NORTH PLYMSTOCK AREA ACTION PLAN

Introduction

- 2.1. This chapter is split into two parts, it firstly provides a summary of findings of the SEA/SA of the Preferred Options and secondly the findings of the Submission Draft North Plymstock Area Action Plan. The overall conclusions and recommendations are set out at the end of this section.

Appraisal of the Preferred Options for the AAP

- 2.2. The 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 North Plymstock Area Action Plan took as its starting point a review of the vision and principles see **Table I**. Overall the SEA/SA confirmed that the vision and principles adhere to the sustainability objectives; however from a brief review it was noted that there were a number of issues which could potentially generate negative impacts. These included:
- The proposals could lead to a sterilisation of land identified as a valuable mineral resource.
 - Care needs to be taken to ensure that potential negative impacts associated with creating mixed use villages in close proximity to land use facilitating the extraction of minerals and collection, treatment and management of waste are mitigated.
 - The siting of development in close proximity to the River Plym could be hampered by concerns over fluvial flooding and a potential rise in sea level.
 - One area which needs to be considered in further detail is how the proposed new neighbourhoods interrelate with existing communities. Questions which will need to be considered include – will there be pressure on existing services and will there be sufficient employment opportunities during the construction phase and afterwards to respond to low employment levels?
 - Further details need to be provided in relation to car parking provision. Will the AAP be seeking to reduce parking provision in residential areas? The proposal is reliant on encouraging people to make a modal shift. Can this be achieved and if not what measures need to be taken to respond to rising levels of traffic and congestion?
 - The design and construction of buildings should seek to not only reduce energy consumption but also water consumption, source materials locally and use where possible secondary materials.
 - Proposals should seek to support local employment opportunities during construction and implementation.

Table 1 North Plymstock AAP SA Objectives and Principles
SA Objectives
BIODIVERSITY – Biodiversity and landscape are properly valued, conserved and enhanced
POLLUTION – Pollution is limited to levels which do not damage natural systems
CLIMATE CHANGE – Emissions contributing to climate change are reduced and adaptation measures are in place
RESOURCES – Demands on natural resources are managed so that they are used as efficiently as possible
ENERGY – Efficient use of energy
WASTE – Waste is minimised and, wherever possible, eliminated
ECONOMY – A diverse and thriving economy
WORK AND INCOMES – Everyone has access to satisfying and fairly paid work and unpaid work is valued
LOCAL NEEDS – Wherever possible, local needs are met locally so support local economies
HEALTH & WELL-BEING – Promoting everyone’s physical and mental wellbeing
LEARNING – Everyone has access to lifelong learning, training opportunities, skills and knowledge
SAFETY – Everyone is able to live without fear of crime or persecution
DISTINCTIVENESS AND CULTURAL HERITAGE – Diversity and local distinctiveness and cultural heritage are valued, protected and celebrated
LEISURE – Opportunities for culture, leisure and recreation are provided widely
TRANSPORT AND ACCESS – Offering inclusive access to all service, including access for those without a car
BASIC NEEDS, EQUALITY AND DIVERSITY – Ensuring community cohesion, tolerance, understanding and equality of opportunity
DEMOCRACY – All sections of the community are empowered to participate in decision making
North Plymstock Principles
CREATE NEW 21 CENTURY NEIGHBOURHOODS- establish sustainable mixed use villages, providing locally for the needs of residents and which effectively connect with and relate to the existing adjacent urban area
A HIGH QUALITY PUBLIC TRANSPORT SYSTEM- new developments will link into and contribute proportionally to the implementation a new mass transit scheme
WALKING AND CYCLING COME FIRST – within and between neighbourhoods walking and cycling will be made easy, safe and pleasant
PROTECTED MINERALS RESOURCES & PROVIDE FOR WASTE TREATMENT AND MANAGEMENT – development and land use will protect and facilitate the extraction of minerals and collection, treatment and management of waste
PROVIDE GREEN LINKS AND GREEN SPACE –development will facilitate a web of green links and the provision or contribution towards extensive areas of wildlife rich open space
SUSTAINABLE EMPLOYMENT AND JOBS – new development will protect existing viable jobs and provide new local employment opportunities for local residents
MEETING THE NEEDS OF EVERYONE IN THE COMMUNITY – new neighbourhoods will provide for the health, housing, recreational, accessibility, educational, social, cultural, governance needs of the communities they serve
ENHANCEMENT OF EXISTING CORRIDORS AND GATEWAYS – the relationship and quality of existing frontage development on main corridors and at gateway locations will be improved
HIGH QUALITY DESIGN, ARCHITECTURE AND LOCAL DISTINCTIVENESS IS ALWAYS EXPECTED – the design of buildings and spaces, their relationship, connections and materials will be good quality and make places
SUSTAINABLE & ENERGY EFFICIENCY – environmental and natural resource protection will underpin the design and development of new communities, so that future generations can meet their needs and have good quality lives
A HIGH QUALITY OF LIFE FOR EVERYONE IN THE COMMUNITY – will be provided by creating the conditions to promote good; physical and mental health, individual and community well being ,personal and environmental safety
PLAN DEVELOPMENT NOW TO FACILIAE FUTURE DEVELOPMENT – development in their period will be planned such that the potential for conflict is designed out and future connection designed in

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: Will the potential effects be short, medium or long term? And are they temporary or permanent?

Magnitude, scale and likelihood of occurrence: Is the scale of the effect, minor, moderate or major (considering the geographical area and size of population) how likely is the impact and where it will occur?

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

Cumulative/secondary and synergistic effects: Are there likely to be cumulative, secondary and synergistic effects through implementing development following the policies in the plan?

Mitigation: What scope is there to avoid adverse effects on sustainability by introducing changes in the way in which a policy is implemented? The measures to be considered include alternatives, the refinement of the policy, additional policies or policy criteria to reduce the impact and/or supplementary planning guidance.

Key Findings

- 2.5. The findings in the July 2005 SEA/SA, based on each preferred option, are presented symbolically in **Table 2** and are described in the text which follows the table.
- 2.6. Sustainability scores in **Table 2** are based on the following ranking:

Key

2	Strongly sustainable
1	Weakly sustainable
0	No impact
-1	Unsustainable
-2	Strongly unsustainable
?	Uncertain

Table 2: SA of Preferred Options																	
Preferred Option	Sustainability Objectives																
	Biodiversity	Pollution	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 Plymstock Quarry	- 1	?	1	-1	2	1	1	1	1	?	0	1	1	1	1	1	0
2: Pomphlett Industrial Estate	?	?	1	1	0	1	-1	1	0	0	0	?	0	0	?	0	0
3 Billacombe Green	1/ - 1	0	0	0	0	0	0	0	0	1	0	1	0	0	1	0	0
4: Wakehams Quarry, river and road frontage	?	?	-1	?	?	?	1	1	1	?	?	?	1	0	?	0	0
5: South West sector of Chelson Meadow	0	0 1	0	0	?	1	0	1	0	-1	0	?	0	0	0	0	0
6: Chelson Meadow Restored landraise site	1	?	0	0	0	2	0	1	0	1	1	?	1	2	1	1	0
7: Saltram House and Country Park	1	0	0	0	0	0	0	0	0	1	1	?	1	2	1	1	0
8: Moorcroft Quarry	0 1	0 1	0	0	?	2	1	1	0	0	0	?	0	0	0	0	0
9: Hazeldene Quarry	- 1	- 1	0	1	-1	-1	1	1	0	-1	0	-1	-1	0	0	0	0
10: Strategic High Quality Transport Links	1	1	1	0	1	0	0	0	0	1	1	1	0	1	2	1	0
11: Elburton	1	?	1	1	1	?	0	?	0	?	1	1	?	1	1	1	0
12: Potential Long term development	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	1	0

Appraisal of the Submission Draft

- 2.7. The following paragraphs provide a summary of the findings of the SEA/SA Submission Draft North Plymstock Area Action Plan focusing on Policy NP01 to 16. Plymouth City Council's responses to specific comments made by the June 2006 SEA/SA are included within **Appendix I**. Where appropriate a response has been made to these comments, elsewhere it is considered that specific concerns have been addressed.

Policy NP 01: Plymstock (July 2005 Appraisal)

Option 1: Plymstock Quarry

- 2.8. **Strengths:** *This option proposes to support and encourage a modal shift in transport, which in turn should have a positive effect on the health and quality of life for the local community. Seeking to generate energy from renewable measures and utilise energy from waste (subject to financial viability) will be a positive step in reducing the consumption of natural resources. In addition, a wide range of employment opportunities should be generated and high quality design achieved which should overcome issues relating to crime and anti social behaviour.*
- 2.9. **Weaknesses:** *Although it is stated under the core principles for this AAP, that the design of development should seek to minimise water consumption and ensure that where possible materials are reused/recycled. Minor short term negative effects will be generated during the construction period of the work associated with air and noise pollution. In addition it is uncertain whether new communities quality of life will be affected by air and noise pollution as well as odour given its proximity to Option 5 Chelson Meadow and Option 8 Moorcroft Quarry. It is also uncertain what the potential impact of the development will be on nature conservation and landscape, especially its visual relationship with Saltram House and Park. What will be the make-up of the community and will properties be purchased by second home owners?*
- 2.10. **Timescale:** *Medium to long term (over the next 5-20 years) due to the time taken for development briefs to be prepared, proposals to come forward and construction to occur.*
- 2.11. **Likelihood:** *Uncertain*
- 2.12. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** *Care needs to be taken to ensure that proposals reduce negative impacts through careful design and monitoring.*

Policy NP 01: Plymstock:

a) Submission Draft Revisions to the SEA/SA (June 2006)

Nature of revisions to the Preferred Option 1 - Plymstock Quarry: Policy NP 01 is an overarching Policy that sets out the development principles of the North Plymstock AAP. Therefore changes to the subsequent Policies within the AAP are reflected in this Policy. The substantive concerns raised by the SEA of the Preferred

Options report are largely addressed through specific policies, nevertheless a number of issues remain and are outlined below:

b) Revised SEA/SA Assessment:

Housing: Housing Policy remains the same in most respects with the addition of lower densities on the greenfield parts of the site. It is uncertain whether increased provision for future housing at the North Elburton site will create additional pressure on the transport network, and waste management in the future. It is assumed that housing and affordable housing in particular will be consistent with the recommendations of the Plymouth Housing Needs Assessment.

Employment: It is assumed that new premises adjacent to the Chelson Meadow Waste Management Centres will be of similar or improved standard to the original proposals and will not be affected by noise, dust, pollution or odour from the Waste Management Centre.

Shopping, community and services: It is anticipated that this Policy should provide adequate number, variety and quality of retail opportunities for local needs. The provision of Primary and Secondary schools is planned for the development, and this is likely to have a positive impact on education.

The omission of an earlier reference to the sensitive and appropriate location of mixed food and drink uses (including an evening economy), may warrant further consideration. It is unclear whether the types of retail defined as not suitable for this site in the Preferred Options have been excluded from the submission draft AAP.

Sport and leisure, open space / public realm: This policy remains essentially the same as that set out in the Preferred Options although additional quantitative data has been provided on the areas of facilities required. It is assumed that these areas are in accordance with national playing fields association guidance where appropriate.

Transport: The provision of the High Quality Public Transport Route remains broadly as outlined in the Preferred Options and should provide a sustainable transport option for the North Plymstock development provided that the estimated uptake is achieved. Reduced speed limits in residential areas are also likely to deliver benefits for road safety.

However, if a modal switch cannot be encouraged for the new communities, significant negative impacts will result generated from an increase in vehicular movements and traffic congestion. The rejection of a park and ride scheme may have negative implications for the transport strategy in the short term, although this remains an option in the future. In addition, the AAP infers the application of “maximum car parking standards” but does not conclude whether there is a ceiling for the number of car parking spaces per household or per number of employees.

Infrastructure and Utilities: The addition of an energy strategy is likely to improve the implementation of renewable energy schemes and energy efficiency within the North Plymstock development. The addition of a reference to sustainable urban drainage and water conservation should deliver benefits for water conservation within the region. The precise nature of renewable energy provision within the North Plymstock development is uncertain, therefore the environmental consequences of such a policy are difficult to predict. For example, the provision of wind turbines may have a negative ecological cost associated with engineering works and supporting infrastructure and may affect landscape

character. This is dependent on the scale, nature and location of development.

Historic and natural environment: The policy introduces a number of specific conservation schemes which were not included in the Preferred Options Report. These areas include: -

- Ecological links between neighbouring areas of nature conservation interest
- Creation of 5ha of calcareous grassland
- Creation of wildlife ponds / wetlands within Wixenford Quarry as mitigation for lost wetlands as a result of development
- Restoration of 5ha of species rich lowland meadow or pasture in fields south of Wixenford Quarry
- Provision of natural greenspace including Wixenford quarry and marsh and the north facing slopes overlooking Chelson Meadow and Saltram Country Estate.

These pro-active measures should provide a positive contribution to offsetting the ecological effects of the North Plymstock development.

Negative impacts on the historic and natural environment are inevitable for a development of this scale; however, this overarching policy seeks to mitigate effects as far as possible as well as being pro-active in providing positive ecological conservation measures. Proposals should cause no net loss of biodiversity. The Plymouth Strategic Flood Risk Assessment identifies an area within the North Plymstock development where there is a significant risk of flooding and this needs to be carefully considered at the detailed design stage and before planning permission for specific development proposals are given.

Recommendations:

Renewable energy provision should be subject to EIA and public consultation where appropriate.

In residential areas care needs to be taken to ensure that proposals for the development of an evening economy do not impact on communities' quality of life.

It is assumed that the development will follow the mitigation measures outlined in the Plymouth Strategic Flood Risk Assessment in areas identified as subject to potential significant flood risk.

c) Further revisions to the Submission Draft AAP (July 2006)

Nature of revisions to the Proposal I - Plymstock Quarry: Minor changes have been made to the wording of the proposal. Changes include the addition of a new section on 'environmental protection' which states that "the assessment of the risk of flooding. The development should be designed to avoid unnecessary development in areas of high risk and minimise the impact of development on flooding, or provide mitigation measures to reduce the impacts of potential flood". This section also includes a reference to environmental health and well-being through careful design.

The Proposal also introduces additional clauses in relation to shopping, community and services including the provision of:

- A children's centre, library, community resource, meeting space (able to accommodate worship), in the region of 1,100 sq. m. as part of the extended primary school.
- Facilities that encourage and promote healthy lifestyles

- In the region of four informal meetings spaces for older children and teenagers as an integral part of the public realm.

d) Further revisions/recommendations in relation to SEA/SA of the latest July 2006 Submission Draft AAP and Commentary on Plymouth City Council's response to the previous SEA/SA

In reviewing Plymouth's response this SEA/SA concludes that the Submission Draft AAP (July 2006) addresses the concerns raised in the previous SEA in relation to flooding (See **Appendix I**) through the new environmental protection section to the proposal stated in section b above.

It should be noted that within the supporting text to this Policy, it is stated that there will be local environmental impacts, but the Policy is framed in such a manner as to "ensure such impacts associated with ecology, visual impact, historic buildings and important landscapes are acceptable and where appropriate, such impacts are mitigated through a variety of measures."

The SEA/SA also accepts that restrictions on the development of an evening economy could be a barrier to mixed use development; however the situation with regard to the evening economy should be subject to review to ensure that anti-social behaviour does not become a significant issue.

Policy NP 02: Pomphlett Industrial Estate (July 2005)

Option 2: Pomphlett Industrial Estate

- 2.13. **Strengths:** *This option offers the potential to encourage the recovery of construction waste. Local employment opportunities have been retained by the transfer of units to an alternative location on site.*
- 2.14. **Weaknesses:** *The importance of the rock face for nature conservation needs to be assessed and appropriate mitigation measures taken if necessary. There is the potential for short term impacts associated with the temporary disturbance to the viability of units and access into the site for employees. There are also short term issues associated with pollution; in particular air and noise during construction.*
- 2.15. **Timescale:** *Medium to long term (over the next 5-20 years) due to the time take for development briefs to be prepared, proposals to come forward and construction to occur.*
- 2.16. **Likelihood:** *High.*
- 2.17. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** *A risk assessment needs to be undertaken, prior to works commencing to ensure proposals to remove the narrow band of steep rock wall do not impact on adjacent land uses, ground water table or biodiversity.*

Policy NP 02: Pomphlett Industrial Estate

a) Submission Draft Revisions to the SEA/SA (June 2006)

The supporting statement for this Policy in the Submission Draft notes that the earlier conclusions of the SA/SEA of the Preferred Options broadly supports the development of the Pomphlett Industrial Estate site; however the principle “sustainability concerns regard loss of employment and potential ecological importance of the rock wall”. The Policy Statement goes on to state that “it is considered that the benefits of development will outweigh ecological impacts”, but that such “impacts should be mitigated as far as possible”.

Nature of revisions to the Preferred Option 2 - Pomphlett Industrial Estate:

The wording of the Submission Draft of the AAP remains broadly equivalent to that contained in Preferred Option 2, although there is an additional reference to the creation of an attractive and high quality entrance for the new neighbourhood.

b) Revised SEA/SA Assessment:

The AAP states that the benefits of the proposal will outweigh the ecological costs of development, which should be mitigated as far as possible. It is clear that the relative merits of the proposal will have to be considered in the detailed design phase and the aim should be to ensure that no net environmental loss occurs.

It is assumed that the design of new premises will be of similar or improved standard to the original premises and will not be affected by noise, dust, pollution or odour from the Waste Management Centre site.

Recommendations:

An assessment needs to be undertaken to ensure that no net environmental loss takes place. Where there are ecological effects, pro-active measures should be taken to improve the environment on adjacent land.

It would be desirable to consider introducing a buffer zone around the Chelson Meadow Waste Management Site to ensure no negative impacts from the adjacent site.

c) Further revisions to the Submission Draft AAP (July 2006)

Nature of revisions to the Proposal NP02: The Proposal contains a number of minor revisions. Firstly affordable housing provision has been revised upwards to 22 homes from a previous target of 14. The number of homes to be built to a ‘lifetime standard’ remains the same.

The proposal also contains an additional clause which states that new development should undertake an “assessment of ecological and other significant natural environment resources and the protection of significant appropriate or mitigation for their loss where their loss is necessary to achieve a high quality development”.

In addition, the supporting text states that “the redevelopment of Pomphlett Industrial Estate will require the relocation of the existing employment uses and therefore is subject to the delivery of suitable alternative sites. The preference would be to integrate the uses in the new development at Plymstock Quarry in addition to the new employment

provision there”.

The supporting text also includes a reference to the use of Compulsory Purchase Powers to progress the redevelopment of the estate.

d) Further revisions / recommendations in relation to SEA/SA of the latest July 2006 Submission Draft AAP and Commentary on Plymouth City Council’s response to the previous SEA/SA

The revisions to the Submission Draft broadly conform to the sustainability objectives and the commentary in the previous SEA/SA remains valid. However, in reviewing Plymouth Council’s comments it is accepted that the recommendations of the previous SEA/SA have been addressed in the latest version of the Submission Draft AAP.

Policy NP 03: Wakehams Quarry (July 2005 Appraisal)

Option 4: Wakehams Quarry, river and road frontage

- 2.18. **Strengths:** *This proposal will have a positive effect on the landscape through high quality design and integration of the site with the remainder of the waterfront. This option should provide for a wide range of employment opportunities in both the office and retail sector.*
- 2.19. **Weaknesses:** *Potential impacts associated with proposals to maintain waste management facilities at Chelson Meadow need to be overcome if this site is going to be used for mixed use development. Although it is stated in the overarching principles, the proposal does need to consider opportunities to reduce energy consumption and minimise waste through the reuse of materials and careful design. The importance of the site in terms of nature conservation interest needs to be carefully assessed and potential issues associated with floodrisk need to be overcome. Careful consideration needs to be given to the viability of displaced businesses and their dependence of the access network. It is uncertain whether an alternative more suitable bus depot will be found. Two important questions for the future concern the social mix and make up of the community and the prospect, given the waterfront location, that property prices will rise through acquisition by more affluent incomers and second home owners.*
- 2.20. **Timescale:** *Medium to long term (over the next 10-20 years) due to the time take for development briefs to be prepared, proposals to come forward and construction to occur*
- 2.21. **Likelihood:** *Uncertain*
- 2.22. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** *Measures need to be put in place through the design of the development to ensure that potential concerns over flood risks, relocation of the existing bus depot, impact on nature conservation and from waste processing and control at Chelson Meadow are addressed*

Policy NP 03: Wakehams Quarry

a) Submission Draft Revisions to the SEA/SA (June 2006)

The Policy points out that the SEA/SA of Preferred Options “highlighted a number of sustainability issues that were in need of careful consideration and potentially mitigation”, however, these issues are not addressed individually.

Nature of revisions to the Preferred Option 4 - Wakehams Quarry, river and road frontage: the main revisions to Preferred Option 4 within Policy NP 03 relate to improvements in transport infrastructure.

b) Revised SEA/SA Assessment:

The Policy includes a number of objectives relating to transport omitted from the Preferred Options including provisions for:

- a water transport mooring hub,
- integrated safe walking and cycling routes and cycle parking,
- adequate transport support infrastructure including the facilitation of transport infrastructure for the eastern corridor,
- development to adhere to the principles of the ‘homezones’ concept and to submit detailed travel plans.

These improvements should have positive implications for the sustainability of transportation within the new development.

However, the Policy advocates the removal of the existing bus depot at the site, but omits the requirement to identify a replacement site. Therefore, it is uncertain whether the existing bus depot to be removed will be replaced. If a replacement bus depot is to be provided, the location of the development is also not identified.

The AAP infers the application of “maximum car parking standards” but does not conclude whether there is a ceiling for the number of car parking spaces per household or per number of employees.

The Plymouth City Council Strategic Flood Risk Assessment states that this site is at risk from tidal flooding along the shoreline.

It is assumed that housing and affordable housing in particular will consistent with the recommendations of the Plymouth Housing Needs Assessment.

The timescale is likely to be long-term as development is scheduled post 2015.

Recommendations:

In accordance with the Plymouth City Council Strategic Flood Risk Assessment development should occur away from areas of the site at risk from flooding unless improvements to shoreline defences take place.

c) Further revisions to the Submission Draft AAP (July 2006)

Nature of revisions to the Proposal NP03: The latest version of the Submission Draft (July 2006) contains the addition of an affordable housing target of 30% for the Wakehams Quarry site, as well as a target of 20% of homes to be built to a ‘lifetime standard’. In addition, the Policy contains a new reference to the delivery of a minimum of 15 per cent of the developments overall energy requirement from on site renewable

energy sources.

Policy NP03 also contains a clause referring to the relocation of the existing bus depot

A detailed area assessment of the flood risk. The development should be designed to avoid unnecessary development in areas of high risk and minimise the impact of development on flooding, or provide mitigation measures to reduce the impacts of potential flood.

d) Further revisions / recommendations in relation to SEA/SA of the latest July 2006 Submission Draft AAP and Commentary on Plymouth City Council's response to the previous SEA/SA

In response to recommendations made in the previous SEA/SA report (June 2006) a new clause has been added to the Policy (see further revisions above) which refers to the avoidance and mitigation of flood risk. This addition is likely to have a positive impact on a number of sustainability objectives in relation to new development.

When the bus depot is relocated, which as the Plan states is unlikely to come forward in the initial phase of the plan period, work should be undertaken to ensure that the new bus depot is sited and designed to cause minimal nuisance in terms of pollution and noise for adjacent amenities, particularly in relation to any residential and mixed landuses.

It is assumed that targets relating to renewable energy and housing are in line with RSS targets and Plymouth's housing needs assessment.

Policy NP 04: Billacombe Green (July 2005)

Option 3: Billacombe Green

- 2.23. **Strengths:** *Positive potential effects from this proposal are associated with long term measures to protect and enhance both the landscape and nature conservation interests of the site and improve pedestrian links. Indirect effects relate to healthier lifestyles and improvements in people's quality of life.*
- 2.24. **Weaknesses:** *Potential negative impacts on biodiversity and landscape through recreational pressure and disturbance from adjacent land uses on the site associated with noise, air and water pollution.*
- 2.25. **Timescale:** *Medium to long term (over the next 5-20 years) due to the time taken for development briefs to be prepared, proposals to come forward and construction to occur*
- 2.26. **Likelihood:** *High.*
- 2.27. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** *Through design and monitoring care needs to be taken to assess the capacity of the site and ensure measures are taken to protect areas of local nature conservation interest.*

Policy NP 04: Billacombe Green

a) Submission Draft Revisions to the SEA/SA (June 2006)

Nature of revisions to the Preferred Option 3 - Billacombe Green: This Policy remains largely unchanged from the Preferred Options.

b) Revised SEA/SA Assessment:

No additional changes were identified. The Policy takes into account the comments of the previous SEA/SA, and maintains that there needs to be an awareness of, and measures to prevent, negative impacts, particularly on wildlife.

Recommendations:

No additional recommendations are made.

c) Further revisions to the Submission Draft AAP (July 2006)

No further revisions were made to Policy NP04

d) Further revisions / recommendations in relation to SEA/SA of the latest July 2006 Submission Draft AAP

No additional revisions or recommendations have been made.

Policy NP 05: Sherford and Sports Hub (North Elburton) (July 2005)

Option 11: Elburton

- 2.28. **Strengths:** *This proposal is generally considered to be positive against sustainability objectives. It is anticipated that the mineral buffer zone referred to under this proposal will be sufficient to diffuse air and noise pollution which may result from Hazeldene Quarry. The proposal lies within close proximity of both a proposed primary and secondary school.*
- 2.29. **Weaknesses:** *There is potential incompatibility between the demands on the road infrastructure for transporting aggregate to and from Hazeldene Quarry and the requirements on the local community. During the construction phase there will be localised dust and air pollution. It is uncertain whether the development will seek to use secondary/recycled materials.*
- 2.30. **Timescale:** *Medium to long term (over the next 10-20 years) due to the time taken for development briefs to be prepared, proposals to come forward and construction to occur.*
- 2.31. **Likelihood:** *High.*
- 2.32. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** *The development briefs for the area should seek to address the following issues:*

- *design out crime,*
- *encourage the reuse of construction and demolition of waste materials in new development,*
- *the sourcing of local materials,*
- *a reduction in energy and water consumption, and*
- *waste minimisation.*

Policy NP 05: Sherford and Sports Hub (North Elburton)

a) Submission Draft Revisions to the SEA/SA (June 2006)

Nature of revisions to the Preferred Option 11 - Elburton: The main revision to the Preferred Option within the Policy relates to an increase in the number of homes to be constructed at the site from 125-210 homes to 320 homes.

b) Revised SEA/SA Assessment:

It is assumed that the increased number of homes provided for in this Policy is in line with the future housing requirements of Plymouth City Council's housing needs assessment and Sherford AAP. It is possible that this increase in housing provision will create additional pressure on existing transport infrastructure despite the numerous traffic improvements advocated within the proposal, although it is anticipated that any effects would be minimal.

The addition of a requirement to provide a minimum of 50% of the new community's energy from renewable energy sources, will contribute positively to Plymouth's renewable energy targets, and reduce consumption of non-renewable resources. In addition provision of rainwater harvesting and grey water harvesting will reduce the impact of the development on the region's water resources.

There may be negative implications in terms of visual impact and ecological damage, although the location at the urban fringe suggests that these impacts may be minimised.

Recommendations:

The impact of wind turbines in the proximity of the site should be carefully considered and should be subject to EIA and public consultation.

c) Further revisions to the Submission Draft AAP (July 2006)

Nature of revisions to the Proposal NP05: Out of the 320 homes to be provided at the Sherford mixed use development, the number of affordable houses has increased from 80 to 96, of which 48 are to be social rented housing and 48 shared equity. This is in line with revisions to the Submission Draft Core Strategy increasing the percentage of affordable housing from 25% to 30%.

d) Further revisions / recommendations in relation to SEA/SA of the latest July 2006 Submission Draft AAP and Commentary on Plymouth City Council's response to the previous SEA/SA

Reference is made under the revised policy states" that detailed aspects of the design do focus on ensuring for a high quality of life and minimal impact on environmental matters"

No additional recommendations are made.

Policy NP 06: Future Development Options North of Elburton and Policy NP 17: Land North of Hazeldene Quarry

- 2.33. Preferred Option 12 'Potential long term development' has been divided into two separate Policies within the AAP. NP 06 relates to future development options north of Elburton, while Policy NP 17 is concerned with future development of land north of Hazeldene Quarry.

Option 12: Potential long term development

- 2.34. **Strengths:** None identified as the proposal has yet to be developed.
- 2.35. **Weaknesses:** It is unknown whether long term development will conflict with the need to exploit mineral reserves which may exist in this location and lead to the sterilisation of land. The development will potentially be hemmed in between the Hazeldene Quarry and the A38 and it is uncertain how potential impacts associated with noise, air pollution which may impact on the communities' quality of life and health will be mitigated.
- 2.36. **Timescale:** Long term (20 years plus).
- 2.37. **Likelihood:** Uncertain.
- 2.38. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** This proposal is dependent on the life span of the quarry, potential extensions to the new development and the location of a buffer zone.

Policy NP 06: Future Development Options North of Elburton

Submission Draft Revisions to the SEA/SA (June 2006)

The supporting statement to this policy notes that the SEA/SA of Preferred Options "demonstrated that the emerging options were sustainable but that specific impacts of proposals would need to be carefully considered during their siting and design and mitigated where appropriate. The proposals set out in this Plan address these concerns and provide for mitigation".

Nature of revisions to the Preferred Option 12 – Potential long term development: This Policy remains similar to Preferred Option 12 with appropriate revisions relating to the establishment of a northern edge to Elburton

b) Revised SEA/SA Assessment:

It is likely that saving land for mixed use development will have a number of socio-economic benefits including contributing to local housing, retail and employment needs. It is assumed that the potential 300 homes at the site conform to the requirements of Plymouth City Council's Housing Needs Assessment.

It is assumed that any future development on the site will conform to the design principles

referred to in Policy NP01, and will be in-keeping with local, historic and landscape character.

Developing green space to the north of Elburton could have negative effects on the ecology of the area if not handled with care. Any proposals should cause no net loss of biodiversity. It is important that the development of this site should support access to open countryside.

Recommendations:

No new recommendations are provided.

c) Further revisions to the Submission Draft AAP (July 2006)

Nature of revisions to the Policy NP06: Additional supporting text accompanies this Policy including reference to the voicing of objections to the development of greenfield land at this site during public consultation. The Policy goes on to state that “the Council considers that this development is necessary and must go ahead to support the sustainable growth of the City. This proposal is supported by the hierarchy of plans”.

d) Further revisions / recommendations in relation to SEA/SA of the latest July 2006 Submission Draft AAP and Commentary on Plymouth City Council’s response to the previous SEA/SA

There are a number of uncertainties in relation to the supporting text added to this Policy within the latest Submission Draft. While the actual Policy suggests that future development north of Elburton is somewhat open ended; with proposals to be subject to assessment of need and economic justification, and the retention of the area as a green buffer as a potential option. The supporting text states that housing development at this site “is necessary and must go ahead”.

In addition, the Policy states that land shall be “safeguarded for its potential to accommodate long-term development beyond 2016” while the supporting text states that “development proposals will be delivered in the period up to 2016;” does this last statement apply to housing or other development referred elsewhere in the plan such as the sports hub and HQPT route, if so further clarification is required. The supporting text is therefore inconsistent with the Policy and it is suggested the supporting text is revised to reflect a more flexible approach to the potential outcome of development at the site.

Policy NP 16: Land North of Hazeldene Quarry (previously Policy NP17)

a) Submission Draft Revisions to the SEA/SA (June 2006)

Nature of revisions to the Preferred Option 12 – Potential long term development: This Policy aims to safeguard land to the north of Hazeldene Quarry beyond 2021, whereas Preferred Option 12 states that development in this area will take place beyond 2016. The Policy also introduces the option of integrating this site within the proposed Countryside Park.

b) Revised SEA/SA Assessment:

The effects of this Policy are dependent on the outcome of the development options

presented in this Policy as proposals have yet to be developed.

New development at the site is likely to have a positive impact on the economy by providing employment and will provide housing for local need.

It is assumed that new housing will also have adequate access to local amenities and employment and will be in line with Plymouth City Council's housing needs assessment. It is also assumed that waste and transport infrastructure will not be put under significant additional pressure by development of the site.

Recommendations:

Consideration should be paid as to the impacts of new developments on traffic, waste management and access to local amenities and employment.

c) Further revisions to the Submission Draft AAP (July 2006)

Policy NP17 has changed to **Policy NP16** in the latest revision of the Submission Draft AAP

Nature of revisions to the Proposal NP16: The Policy remains fundamentally unchanged for the purposes of the SEA/SA, although the alternative option of incorporating this area into the proposed Country Park if development does not occur has been removed. Changes to the supporting text include an addition to the final paragraph which highlights concerns about the Policy raised through the public consultation process.

d) Further revisions / recommendations in relation to SEA/SA of the latest July 2006 Submission Draft AAP and Commentary on Plymouth City Council's response to the previous SEA/SA

No additional recommendations have been made.

The SEA/SA notes that Plymouth County Council has addressed the recommendations raised in the previous SEA/SA report (see **Appendix I**).

Policy NP 07: High Quality Public Transport Route

Policy NP 08: Improvements to Public Transport Services in Plymstock

Policy NP 09: Highway Infrastructure Improvements and Traffic Management

Policy NP 10: National Cycle Network

- 2.39. Preferred Option 10, 'Strategic High Quality Transport Link', has been separated into Policies NP 07, NP 08, NP 09 and NP10 within the AAP.

Option 10: Strategic High Quality Transport Links (July 2005 Appraisal)

- 2.40. **Strengths:** The proposal is generally compatible with the sustainability objectives in seeking to introduce alternative transport solutions to respond to a rise in population within the area. If the proposal is effective it should lead to a stabilisation/reduction in vehicular movements and have a positive effect on biodiversity, air quality and communities' health and quality of life. In addition proposals seek to generate links across the A379 which should overcome issues associated with safety.
- 2.41. **Weaknesses:** Whilst negative effects are not apparent from the proposal itself, if a modal switch cannot be encouraged for the new communities, significant negative impacts will result generated from an increase in vehicular movements and traffic congestion.
- 2.42. **Timescale:** Medium to long term (over the next 10-20 years) due to the time taken for development briefs to be prepared, proposals to come forward and construction to occur
- 2.43. **Likelihood:** High.
- 2.44. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** It is essential that the infrastructure is in place to encourage a modal shift at the outset of the development. In addition, opportunities should be explored to minimise car parking provision for both residential and employment land and ensure that links across the A 379 are sited in convenient locations.

Policy NP 07: High Quality Public Transport Route

a) Submission Draft Revisions to the SEA/SA

Nature of revisions to the Option 10 - Strategic High Quality Transport Links: This Policy forms the main component of the Preferred Option and relates to the HQPT route which will service the North Plymstock development.

b) Revised SEA/SA Assessment:

Proposals 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.

Recommendations:

No additional recommendations have been identified.

c) Further revisions to the Submission Draft AAP (July 2006)

Nature of revisions to Proposal NP07: The latest revision of the Submission Draft AAP includes the addition of clauses 8 and 9.

8) This states that the HQPT will provide for the assessment of the risk of flooding and design to avoid unnecessary development in areas of high risk and minimise the impact of development on flooding, or provide mitigation measures to reduce the impacts of

potential flood.

9) States that the HQPT must assess the ecological impact of proposals and avoid unnecessary damage to significant features. Where loss to significant features is unavoidable the scheme should provide for appropriate mitigation measures.

d) Further revisions / recommendations in relation to SEA/SA of the latest July 2006 Submission Draft AAP and Commentary on Plymouth City Council's response to the previous SEA/SA

The addition of clauses 8 and 9 will further strengthen the Proposal against sustainability objectives in relation to flooding and ecological protection.

No additional recommendations have been identified.

Policy NP 08: Improvements to Public Transport Services in Plymstock

a) Revisions to the SEA/SA

Nature of revisions to the Option 10 - Strategic High Quality Transport Links:

This Policy relates to the enhancements of bus routes servicing the existing area of Plymstock achieved through a Quality Bus Contract.

b) Revised SEA/SA Assessment:

It is assumed that this Policy will have a positive impact on the sustainability of transport Policy and ensure a competitive tendering process.

Recommendations:

No additional recommendations are identified.

c) Further revisions to the Submission Draft AAP (July 2006)

Nature of revisions to Policy NP08: The Policy remains fundamentally unchanged in relation to the SEA/SA.

d) Further revisions / recommendations in relation to SEA/SA of the latest July 2006 Submission Draft AAP and Commentary on Plymouth City Council's response to the previous SEA/SA

No additional revisions or recommendations have been made.

Policy NP 09: Highway Infrastructure Improvements & Traffic Management

a) Submission Draft Revisions to the SEA/SA

Nature of revisions to the Option 10 - Strategic High Quality Transport Links:

This Policy is concerned with the provision of infrastructure to support the HQPT route.

b) Revised SEA/SA Assessment:

There is the potential for some adverse environmental impacts to arise during construction of the infrastructure for a sustainable transport system and the HQPT.

The location of crossing points for the A379 also remains uncertain.

Recommendations:

In addition to the recommendations provided by the previous SEA/SA on Preferred Option Policy 10, an environmental assessment should be carried out for infrastructure improvements where appropriate to ensure that any short term environmental impacts are minimised as far as possible.

c) Further revisions to the Submission Draft AAP (July 2006)

Nature of revisions to Proposal NP08: The Proposal remains fundamentally unchanged in relation to the SEA/SA.

d) Further revisions / recommendations in relation to SEA/SA of the latest July 2006 Submission Draft AAP and Commentary on Plymouth City Council's response to the previous SEA/SA

The SEA notes the Council's response to the recommendations of the previous SEA/SA which states that an EIA of individual schemes will be undertaken where appropriate (depending on scale and impact) at the project level.

Policy NP 10: National Cycle Network:

a) Submission Draft Revisions to the SEA/SA (June 2006)

Nature of revisions to the Option 10 - Strategic High Quality Transport Links: This Policy relates to the implementation of the National Cycle Network routes 2 and 27 along the eastern corridor.

b) Revised SEA/SA Assessment:

No additional impacts have been identified. It is assumed that in addition to facilitating the implementation of the NCN routes along the eastern corridor, any cycling provisions as part of transport plans within new developments will join onto the NCN routes thereby creating a more integrated cycle network.

Recommendations:

No additional recommendations were identified.

c) Further revisions to the Submission Draft AAP (July 2006)

Nature of revisions to Proposal NP08: The proposal has been updated to include the ways in which it will be achieved - through securing protective alignments. The requirement for development to facilitate the NCN route 27 has also been excluded.

d) Further revisions / recommendations in relation to SEA/SA of the

latest July 2006 Submission Draft AAP and Commentary on Plymouth City Council's response to the previous SEA/SA

No additional revisions or recommendations have been made.

Policy NP 11: Moorcroft Quarry (July 2005)

Option 8: Moorcroft Quarry

- 2.45. **Strengths:** *This option has positive effects in terms of seeking to locate development away from sensitive land uses and therefore minimising the effects on community's quality of life.*
- 2.46. **Weaknesses:** *The proposal acknowledges that there may be potential issues associated with air and noise pollution as well as odour for adjacent communities. There is potential incompatibility between the demands on the road infrastructure for transporting waste and proposals for the new community at Sherford. In addition it is uncertain from this proposal how the waste management facilities link with Option 6 in terms of transportation and if they constitute two separate and distinct sites. The proposal does not clarify whether the waste management facility can generate energy from waste and how many jobs will be created.*
- 2.47. **Timescale:** *Short to medium term (over the next 5-15 years) depending on the availability of land.*
- 2.48. **Likelihood:** *Medium*
- 2.49. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** *Care needs to be taken to ensure that proposals reduce negative impacts through careful design and monitoring.*

Proposal NP 11: Moorcroft Quarry (NP15 in latest revision July 2006)

a) Submission Draft Revisions to the SEA/SA (June 2006)

The supporting policy statement in the Submission Draft AAP notes that the SEA/SA "demonstrated that the proposal is sustainable but that there was a need to address transport implications of the development. The proposals address those concerns, but waste use inside the quarry is considered to be acceptable in principle and the facilitation of the HQPT will mitigate additional transport impacts of the waste employment development."

Nature of revisions to the Preferred Option 8: Moorcroft Quarry: Policy NP 11 articulates a requirement for the full allocation of land for redevelopment of waste management facilities provided in the Waste LDD, rather than 4.5 ha with an option to redevelop a further 3.5 ha later as stated in the Preferred Options.

b) Revised SEA/SA Assessment:

The additional capacity provided by the extra land for waste management facilities will contribute meeting the extra demands created by the development. It is assumed that the additional 3.5ha of land utilised within the Policy will not be operationally required for mineral extraction.

The AAP states that the transport implications of the Moorcroft Quarry redevelopment will be addressed through improvement as a result of the HQPT. However, this will only be possible if a modal switch is successful for the new communities within the Plymstock development. In the event of these benefits failing to materialise the potential incompatibility between the facility and its demands on the road network remain.

The Policy states that the area will benefit from the employment opportunities to be created through the redevelopment, however, the number of jobs to be created remains uncertain.

Recommendations:

No additional recommendations are provided.

c) Further revisions to the Submission Draft AAP (July 2006)

Proposal NPI I has become Proposal NPI5 in the latest revision to the Submission Draft AAP (July 2006).

Nature of revisions to Policy NPI5: The proposal is roughly equitable to that contained within the previous AAP, with the addition of a clause stating that development should provide for the “assessment of the potential environmental and health impacts of the development and provision of mitigation measures if necessary”.

d) Further revisions / recommendations in relation to SEA/SA of the latest July 2006 Submission Draft AAP and Commentary on Plymouth City Council’s response to the previous SEA/SA

The addition of a clause relating to the assessment of the potential environmental and health impacts of the development and provision of mitigation measures is likely to positively contribute towards addressing the initial recommendations of the SEA/SA of Preferred Options.

Policy NP 12: Countryside Park (July 2005)

Option 7: Saltram House and Country Park

- 2.50. **Strengths:** *This proposal will have a positive effect on the surrounding landscape. It should enhance nature conservation interests and improve the local communities’ quality of life through informal and formal recreation, which in turn should improve health, quality of life and well being. The proposal should also relieve recreational pressure off Saltram Estate.*
- 2.51. **Weaknesses:** *Whilst there are no negative impacts, it is uncertain whether issues of safety need to be addressed.*

2.52. **Timescale:** Medium to long term (over the next 5-20 years) due to the time taken for development briefs to be prepared, proposals to come forward and construction to occur

2.53. **Likelihood:** Uncertain.

2.54. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** In the design of the proposals it is important to ensure that the setting of Saltram Estate is respected and visual integrated into landscape proposals.

Proposal NP 12: Countryside Park

a) Submission Draft Revisions to the SEA/SA (June 2006)

The statement supporting the revised Policy notes that the SEA/SA of Preferred Options “demonstrates that the proposal is sustainable but suggests that the planning framework seeks to respect the setting of Saltram Estate”.

Nature of revisions to the Preferred Option 7- Saltram House and Country Park: Policy NP 12 constitutes a more detailed proposal than that presented in the Preferred Options. Additions to the proposals aimed at addressing concerns raised during the previous SEA/SA process include:

1. Development of a series of sensitively designed footpath, cycleway and bridleway routes and circuits throughout the Countryside Park area, promoting access by sustainable means into the area (from Park & Rides, and other visitor access points).
2. A cycleway, following new and existing routes, linking the National Cycle Network route 2, via a sports hub on the edge of Sherford new community to Stags Lodge, linking in with existing access through Saltram Park.
3. Further links east of Sherford to the new community park and beyond which will also provide an extensive network of recreational footpath and cycle routes.
4. Links to the ridgeline north of the A38, including Amados Hill, Hardwick Wood, and beyond to Plympton St. Maurice.
5. Links to the South West Coastal Path.
6. Improved access by public transport including from Park & Rides and HQPT stops.

Other additions to the proposal include the provision of allotments and the safeguarding of burial grounds including the current Drake’s Memorial Park.

b) Revised SEA/SA Assessment:

The additions to the Country Park proposal are likely to have a positive effect on the sustainability of transport in relation to the site, and the provision of allotments will contribute to the health and well-being of the community. The safeguarding of burial land is also an important addition to the proposal.

The AAP states that the Countryside Park will include Saltram Estate and that visitor numbers are likely to increase owing to its recreational role for the residents of the Plymstock development.

Recommendations:

It is important that the necessary resources are committed by the City Council or others to support the required level of visitor management and maintenance of

open space.

c) Further revisions to the Submission Draft AAP (July 2006)

Proposal NP12 has been changed to Proposal NP11 in the latest Submission Draft AAP (July 2006)

Nature of revisions to Proposal NP11: The Proposal remains similar to the preceding Submission Draft, June 2006. Minor changes to the Proposal include:

- the requirement for the countryside park partnership to “co-ordinate the development of a masterplan, visitor strategy (which includes an assessment of the recreational carrying capacity of the area based on current and future demand), funding bids and management plan, and ongoing management issues” and;

The Proposal also contains an additional clause relating to the “preservation of the historic character and national importance of Saltram House, Gardens and Parkland and the retention of strategic views”.

d) Further revisions / recommendations in relation to SEA/SA of the latest July 2006 Submission Draft AAP and Commentary on Plymouth City Council’s response to the previous SEA/SA

It is acknowledged that the recommendations of the previous SEA and those of the Preferred Options have been addressed by the Council in the changes to this version of the Submission Draft outlined above (**See Appendix I**). No further recommendations have been identified.

Policy NP 13: Chelson Meadow Restored Landfill Site (July 2005)

Option 6: Chelson Meadow restored landraise site

- 2.55. **Strengths:** *This proposal will have a positive effect on the local communities’ quality of life, health and wellbeing through the provision of outdoor sports and leisure uses; both formal and informal. The proposal could generate employment opportunities in leisure and due to its close proximity to waste facilities it should result in replenishment of soil condition.*
- 2.56. **Weaknesses:** *Potential issues are associated with flytipping from adjacent land uses and concerns over safety relating to the dispersal of gases generated from buried waste.*
- 2.57. **Timescale:** *Medium to long term (over the next 5-20 years) due to the time taken for development briefs to be prepared, proposals to come forward and construction to occur.*
- 2.58. **Likelihood:** *Uncertain.*
- 2.59. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** *A risk assessment needs to be undertaken to determine safety levels and ensure that potential pollution generated from decomposing waste is mitigated. In addition, the*

new public open space must be sensitively designed to reduce crime or fear of crime with lighting in key locations.

Proposal NP 13: Chelson Meadow Restored Landfill Site

a) Submission Draft Revisions to the SEA/SA (June 2006)

The supporting statement to this Policy notes that the previous SEA/SA of Preferred Options “broadly supports this proposal, although there are legitimate concerns about the potential for impacts on the character of Saltram park and potential for risk from pollution by landfill gases. These issues are addressed by the proposals and the planning framework will seek their appropriate resolution”.

Nature of revisions to the Preferred Option 6: Chelson Meadow restored landraise site: The Policy remains mostly unchanged from Preferred Option 6, although the Policy states that development should “contribute towards Regional Biodiversity Action Plan targets for Accessible Natural Green space and habitat restoration”.

b) Revised SEA/SA Assessment (June 2006)

In addition to leisure and recreation benefits and associated health improvements, this Policy states that there may be opportunities for biodiversity through contributions towards regional BAP Targets for accessible natural green space and habitat restoration. Therefore this Policy will also have a positive impact on Sustainability Objective 1 – Biodiversity and landscape.

The issues of fly-tipping and dispersal of gases (such as methane – a greenhouse gas) remain uncertain.

If more intensive recreational proposals are carried forward to development there may be increased pressure on the local transport network. While access and parking are considered in the Policy, traffic and public transport issues are not considered.

Plymouth City Council’s Strategic Flood Risk Assessment states that the area south west of Chelson Meadow is at risk from both tidal and fluvial flooding. This is a significant problem as flooding of the former landfill site could result in contamination over a wide area.

Recommendations:

This Policy should also include requirements to carry out the appropriate mitigation measures for the construction of flood defences, in line with recommendations of the Plymouth City Council’s Strategic Flood Risk Assessment.

c) Further revisions to the Submission Draft AAP (July 2006)

Proposal NP13 has been changed to Proposal NP12 in the latest Submission Draft AAP

Nature of revisions to Proposal NP12: The proposal contains minor changes including:

- The addition of a clause for protection of the land-raise restoration system in order to protect the environment from the emissions arising from the decomposing waste; and to prevent pollution incidents and excessive development. And;

A clause requiring assessment of the flood risk, avoiding unnecessary development in areas of high risk and minimising the impact of development on flooding, or for development to provide mitigation measures to reduce the impacts of potential flood.

d) Further revisions / recommendations in relation to SEA/SA of the latest July 2006 Submission Draft AAP and Commentary on Plymouth City Council's response to the previous SEA/SA

The latest revision to the Submission Draft SEA/SA address concerns about flooding at the site through changes to the Proposal, as detailed above.

Policy NP 14: Gateway Corridors and Waterfront Policies

- 2.60. The Preferred Options contained *Principle 8 - Enhancement of existing corridors and gateways*, which stated that “*the relationship and quality of existing frontage development and new development opportunities on main corridors and at gateway locations will be improved and well related*”. Policy NP 14 has been added to the AAP and is designed to fulfil this principle.

Policy NP 14: Gateway Corridors and Waterfront Policies Submission Draft Statement

This Policy should produce a positive outcome in relation to the protection and enhancement of important landscapes, features and waterscapes. The strategic improvements of gateway corridors and waterfront areas should also increase the area's attractiveness to outside investment and increase Plymouth's competitiveness.

However, there may be a possible contradiction between the development of some proposals sites within North Plymstock and this Policy, through potential visual impacts on landscape character.

Timescale: Medium to long term (over the next 5-20 years) due to the time taken for development briefs to be prepared, proposals to come forward and construction to occur.

Likelihood: Uncertain.

Recommendations for mitigation of adverse effects and/or enhance or positive effects: Provide measures to mitigate any negative visual impacts associated with development of the proposals sites.

Revisions to the Submission Draft AAP (July 2006)

Policy NP14 has been deleted from this AAP.

Recommendations in relation to SEA/SA of the latest July 2006 Submission Draft AAP and Commentary on Plymouth City Council's response to the previous SEA/SA

Gateway Corridors and Waterfront Policy NP14 from the previous Submission Draft AAP (June 2006) has been incorporated within Objective 5 - Provide a new high quality 'eastern gateway' into the city, with a strong sense of place and local distinctiveness particularly on key road & water frontages; and various site proposals including:

Policy NP03 – Wakehams Quarry,

Proposal NP 05. - Sherford and Sports Hub (North Elburton), and

Proposal NP 07 - High Quality Public Transport Route.

Policy NP 15: Hazeldene Quarry – Minerals Development (July 2005)

Option 9: Hazeldene Quarry - Minerals

- 2.61. **Strengths:** *This proposal seeks to protect mineral reserves for future use and provides alternative employment opportunities for the local economy.*
- 2.62. **Weaknesses:** *Potential weaknesses relate to water quality, air pollution, transportation, amenity, health, and erosion of the landscape/nature conservation interest which are already referred to in the proposal. In addition, although not specifically referred to in the proposal, the new development at Sherford will effectively result in the sterilisation of mineral reserves to the east, although the extent of these reserves is undefined.*
- 2.63. **Timescale:** *Medium to long term (over the next 10-20 years) due to the time taken for development briefs to be prepared, proposals to come forward and construction to occur*
- 2.64. **Likelihood:** *High.*
- 2.65. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** *Care needs to be taken to establish annual monitoring plans associated with any further extraction to ensure any potential negative impacts are mitigated.*

Policy NP 15: Hazeldene Quarry – Minerals Development

a) Submission Draft Revisions to the SEA/SA (June 2006)

Nature of revisions to the Preferred Option 9: Hazeldene Quarry – Minerals: This Policy remains essentially the same with the exception of the omission of “the revocation of mineral extraction to the east of Hazeldene Quarry” advocated in the Preferred Options Report.

b) Revised SEA/SA Assessment:

The Policy addresses the concerns of the previous SEA/SA in relation to sterilisation of mineral resources to the east by excluding the clause which advocates the revocation of mineral extraction to the east of Hazeldene Quarry. It is uncertain, however, how this will affect development at Sherbourne, if at all.

<p>Recommendations:</p> <p>No additional recommendations were provided.</p>
<p>c) Further revisions to the Submission Draft AAP (July 2006)</p> <p>Policy NP 15 has been changed to Policy NP 13 within the latest version of the Submission Draft AAP (July 2006)</p> <p>Nature of changes to Policy NP 13: This Policy is essentially the same as Policy NP 15 although additions relate to the inclusion of the area of known mineral reserve and a buffer zone in land to be safeguarded for future limestone extraction.</p> <p>The Policy also includes the addition of an appropriate method of monitoring and review of the development's long term environmental impacts. The Policy also states that "this will be achieved either through only consenting development proposals for individual phases, each of which's impacts are more reasonable to predict, or through a scheme of phasing and environmental review periods to monitor and manage potential environmental impacts which can not be predicted at the time of granting consent".</p>
<p>d) Further revisions / recommendations in relation to SEA/SA of the latest July 2006 Submission Draft AAP and Commentary on Plymouth City Council's response to the previous SEA/SA</p> <p>Changes to Policy NP 13 (previously NP 15), identified above, have addressed the recommendations of the SEA/SA of Preferred Option 9. The Policy therefore broadly conforms to sustainability objectives and no further recommendations are identified.</p>

Policy NP 16: Chelson Meadow Waste Management Centre (July 2005)

Option 5: South West sector of Chelson Meadow

- 2.66. **Strengths:** *This option has positive effects in terms of seeking to locate development away from sensitive land uses and therefore minimising the effects on community's quality of life. It seeks to retain existing employment opportunities and offers the potential to generate energy from waste, and supports objectives to recover waste.*
- 2.67. **Weaknesses:** *Negative effects could relate to air and noise pollution as well as odour and risks to health for adjacent communities. Although the proposal states that release of emissions from tipping at Chelson Meadow will be controlled, the implications for future residential developments are uncertain. There is a potential incompatibility between the demands on the road infrastructure for transporting waste, the adequacy of the existing road infrastructure and proposals for the new community at Wakehams Quarry. In addition it is uncertain from this proposal how the waste management centre links with Preferred Option 8 in terms of transportation and if they are two very separate, distinct sites. As the location of the site is on the waterfront, care and adequate screening measures need to be in place.*

- 2.68. **Timescale:** Short to medium term (over the next 5-20 years) depending on the availability of land.
- 2.69. **Likelihood:** Medium
- 2.70. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** Care needs to be taken to ensure that proposals reduce negative impacts through careful design and monitoring.

Policy NP 16: Chelson Meadow Waste Management Centre

a) Submission Draft Revisions to the SEA/SA (June 2006)

The supporting policy statement notes that the previous SEA/SA of Preferred Options “in the main demonstrates that this policy is sustainable apart from [concerns] about the potential impact on health and well-being of occupants of the new neighbourhood. This issue has been addressed in this policy and the proposal for Plymstock Quarry. It will be necessary, as waste management on this site is a fact, for developments on both sites to respond appropriately. The planning framework provides for this.”

Nature of revisions to the Preferred Option 5: South West sector of Chelson Meadow: This Policy is essentially unchanged from Preferred Option 5 with the exception of a number of additions regarding sensitive design and layout, protection of the health and amenity of potential occupants and local environmental impacts. In addition the Policy contains an added objective of Safeguarding the site for potential Waste to Energy/ or use for a Combined Heat and Power plant.

b) Revised SEA/SA Assessment:

The concerns raised in the SA/SEA of the Preferred Options Report about health and safety and amenity impacts for residents of the new Plymstock development remain although efforts to mitigate these effects are referred to in this Policy as well as the Proposal for Plymstock Quarry.

The Plymouth Council Strategic Flood Risk Assessment states that the area south west of Chelson Meadow is at risk from both tidal and fluvial flooding. This is a significant problem as flooding of the site could result in contamination over a wide area.

Recommendations:

This Policy should include requirements to carry out the appropriate mitigation measures of relocation of some development and construction of flood defences, in line with the recommendations of the Plymouth Council Strategic Flood Risk Assessment.

c) Further revisions to the Submission Draft AAP (July 2006)

Policy NP 16 has been changed to Policy NP 14 in the latest Submission Draft AAP.

Nature of revisions to Policy NP 14: This Policy is essentially the same as its predecessor with the inclusion of an additional clause in relation to flooding:

“New waste handling and/or treatment facilities should provide for, the assessment of the risk of flooding. The development should be designed to avoid unnecessary

development in areas of high risk and minimise the impact of development on flooding, or provide mitigation measures to reduce the impacts of potential flood.”

d) Further revisions / recommendations in relation to SEA/SA of the latest July 2006 Submission Draft AAP and Commentary on Plymouth City Council’s response to the previous SEA/SA

Concerns relating to health, safety and amenity highlighted in the previous SEA/SA remain valid; however, the recommendations of the previous SEA/SA with regard to flooding have been address through the changes to the Policy outlined above.

Conclusions and Recommendations

- 2.71. Substantial revisions have been made to the latest North Plymstock AAP Submission Draft (July 2006) including a number of improvements designed specifically to mitigate potential adverse effects noted by the SEA/SA of the previous version of the Draft AAP (June 2006). The results of the SEA/SA indicate that the AAP has largely addressed the recommendations of the previous SEA/SA and therefore broadly conforms to the Sustainability Objectives.
- 2.72. Whilst specific recommendations are detailed in the boxes for each policy, consideration needs to be given to 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 European Marine Site. The SEA/SA of the Core Strategy highlights that at an 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 200 sites, but individual components of work in infrastructure, including flood protection, drainage and waste management could have the potential to impact adversely in parts of the Plymouth Sound and Estuaries European Marine Site. As work identified through this AAP could have an impact on parts of the Sound and Estuaries European Marine Site, a closer examination, including use of environmental impact assessment (EIA) where appropriate at the design stage, will be necessary where major infrastructure work is planned abutting (for drainage directly to) the Natura 2000 site.

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, and
 - 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). Additional indicators have been suggested by consultees in their responses to the Scoping Report consultation and these have been included in the revised table of proposed indicators for monitoring the effects of the SA/SEA (**Table A3.1** in **Appendix 3**). These should be used as a basis for developing the SA monitoring framework as it may not be necessary or appropriate to collect data for all of the indicators.
- 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.

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)

- 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.

Appendix I

Plymouth City Council Responses to previous SEA (Volume 2, Revision I, July 2006)

	SEA/SA Recommendation	Response	Comment
Policy NP 01: Plymstock Quarry			
1	Renewable energy provision should be subject to EIA and public consultation where appropriate.		Will be dealt with at planning application stage.
2	In residential areas care needs to be taken to ensure that proposals for the development of an evening economy do not impact on communities' quality of life.	Core Strategy Policy CS01, CS13 and CS22.	This is a 'local centre' and it must perform a role in providing for a mix of uses and not a monochrome housing estate.
3	Assumed that development will follow the mitigation measures outlined in the Plymouth Strategic Flood Risk Assessment in areas identified as subject to potential significant flood risk.	See NP 01.60 in new section 'environmental Protection'.	
Policy NP 02: Pomphlett Industrial Estate			
4	An assessment needs to be undertaken to ensure that no net environmental loss takes place. Where there are ecological effects, pro-active measures should be taken to improve the environment on adjacent land.		NP01 proposes several specific biodiversity actions. Application will be subject to EIA, which will include and ecology impact assessment. Core Strategy Policy CS19 provides appropriate policy framework.

	SEA/SA Recommendation	Response	Comment
5	It would be desirable to consider introducing a buffer zone around the Chelson Meadow Waste Management Site to ensure no negative impacts from the adjacent site.	See Policy NP01.61	It is not possible to define a mapped buffer zone as the width of the buffer can not be prescribed or evidenced. The Policy framework allows for appropriate response to the relationship between land uses. The Proposal and the design issues map indicate a buffering B1 land use at this boundary.
Policy NP 03: Wakehams Quarry			
6	In accordance with the Plymouth City Council Strategic Flood Risk Assessment development should occur away from areas of the site at risk from flooding unless improvements to shoreline defences take place.	See NP 03.16.	
Policy NP 04: Billacombe Green			
7	No additional recommendations are provided.	Noted.	
Policy NP 05: Sherford and Sports Hub (North Elberton)			
8	The impact of wind turbines in the proximity of the site should be carefully considered and should be subject to EIA and public consultation.		Proposal only requires contribution towards provision of facility outside the City. South Hams District Council in their Core Strategy, the Sherford AAP and consideration of planning applications will deal with the matter of impact of wind turbines.
Policy NP 06: Future Development Options North of Elburton			

	SEA/SA Recommendation	Response	Comment
9	No new recommendations are provided, suggests that previous recommendations have not been addressed.		Not clear if there is a need for a SEA response to this. Will be dealt with through a plan, monitor manage approach. Proposal is 'long term marker' and which will need further assessment in due course.
Policy NP 17: Land North of Hazeldene Quarry			
10	Consideration should be paid as to the impacts of new developments on traffic, waste management and access to local amenities and employment.	Various Core Strategy policies would allow for these issues to be addressed. But this is not an allocation but a long term safeguarding for potential future development. The detailed case for need and impact will be assessed in future revisions to the LDF	NB. now NP16.
Policy NP 07: High Quality Public Transport Route			
11	No additional recommendations were identified.	See NP07.5	
Policy NP 08: Improvements to Public Transport Services in Plymstock			
12	No additional recommendations are identified.	Noted.	
Policy NP 09: Highway Infrastructure Improvements and Traffic Management			
13	In addition to the recommendations provided by the previous SA/SEA on Preferred Option Policy 10, environmental assessment should be carried out for infrastructure improvements where appropriate to ensure that any short term environmental impacts are minimised as far as possible.	Environmental impact assessments of individual schemes will be undertaken where appropriate (depending on scale and impact) at the project level.	

	SEA/SA Recommendation	Response	Comment
Policy NP 10: National Cycle Network			
14	No additional recommendations were identified.	Noted.	
Policy NP 11: Moorcroft Quarry			
15	No additional recommendations are provided, suggests that previous recommendations have not been addressed.	See NP15.9 and CS25 and CS26 and CS22.	Note that the waste proposal will be fully developed in the Waste DPD.
Policy NP 12: Countryside Park			
16	It is important that the necessary resources are committed by the City Council or others to support the required level of visitor management and maintenance of open space.	See NP01.24 and NP 11.1.	
Policy NP 13: Chelson Meadow Restored Landfill Site			
17	This Policy should also include requirements to carry out the appropriate mitigation measures for construction of flood defences, in line with the recommendations of the Plymouth Council Strategic Flood Risk Assessment.	See NP 12 point 8.	The raised levels at Chelson Meadow take the land well above potential flood risk, although access point on the fringe of the site could be subject to flood risk and may require assessment.
Policy NP 14: Gateway Corridors and Waterfront Policies			
18	Provide measures to mitigate any negative visual impacts associated with development of the proposals sites.	Policy deleted.	The design quality aspects of this policy are reflected in the various site proposals.
Policy NP 15: Hazeldene Quarry- Minerals Development			

	SEA/SA Recommendation	Response	Comment
19	No additional recommendations were provided, suggests previous recommendations have not been addressed.	See policy NP13.6	
Policy NP 16: Chelson Meadow Waste Management Centre			
20	This Policy should include requirements to carry out the appropriate mitigation measures of relocation of some development and construction of flood defences, in line with the recommendations of the Plymouth Council Strategic Flood Risk Assessment.	See policy NP14 point 5.	
General Recommendations			
21	None of the development proposals within the Area Action Plan should 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.	See CS Area Vision 8 for North Plymstock	None of the development proposals have been considered in isolation, the basis for this comment is not understood and should be evidenced. On the contrary it is considered that the plan clearly shows that mutual impacts of proposals and cumulative, where likely are clearly provided for in the policy framework.
22	Throughout the phasing of development, it is important to ensure that the community functions sustainably with adequate services, facilities and infrastructure to meet all needs.	See NP01.62, NP05.48 that are the principal developments that create new neighbourhoods in the initial plan period.	

	SEA/SA Recommendation	Response	Comment
23	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.	See NP11.1	
24	A strong link needs to be made between the Core Strategy Preferred Options and Area Action Plans particular in relation to design principles.	See CS Area Vision 8 – North Plymstock.	It should be noted that Documents should be read in conjunction with one another, therefore no need for extensive cross-referencing.
25	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.		Strategic Flood Risk Assessment completed June 2006. This assessment has informed plan content.
26	Public transport infrastructure needs to be in place well in advance of new development occurring.	See NP01.62, NP05.48, NP07.5.	The policy framework seeks to provide for an appropriate level of transport infrastructure to be in place as each phase of development is completed.

	SEA/SA Recommendation	Response	Comment
27	It is important not only to influence this modal shift through residential development (i.e. minimising car parking provision) but also through the decisions of major employers.	See CS28 (whole policy but, point 2 in particular)	Core Strategy and allocations in AAPs need to be read as a whole.
28	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.	See CS28 (whole policy but, point 2 in particular).	Core Strategy and allocations in AAPs need to be read as a whole.
29	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.	Not accepted.	Alternative, bottom draw back up plans in case of failure is not good planning. Plans are submitted on the basis that they are sound and robust. The planning system provides for a more robust system of 'plan, monitor, manage' to address any plans that might be going of course.

	SEA/SA Recommendation	Response	Comment
30	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.	See Core Strategy CS 20 – resource use. See NP01.48 to 54 and NP05.40 to 45, - these are two most significant allocations in this area plan in the initial plan period.	Policy framework is adequate and the issues can be dealt with through Development Control process. A design guide would be helpful but is not required, and can only be produced if resources permit in relation to other priorities.
31	Opportunities should be explored to link development proposals with waste processing facilities for example through the replenishment of soil for Chelson Meadows restored land raise site.		It is not clear if this is a suggestion or a substantive comment on the sustainability performance of the plan. The Waste chapter of the Core Strategy does provide a substantive policy framework for the consideration of waste issues in relation to any development proposal.

	SEA/SA Recommendation	Response	Comment
32	Buffer zones need to be clearly defined to ensure potential impacts from air, noise and odour are mitigated.	See NP01.61 and NP05.47 including proposals map for NP05.	It is not possible to define a mapped buffer zone for Chelson Meadow (NP12 & NP14) and its relationship with Plymstock Quarry (NP01), as the width of the buffer can not be prescribed or evidenced, like the one for Hazeldene/ Sherford can be. The Policy framework for these sites allows for appropriate response to the relationship between land uses. The Proposal and the design issues map indicate a buffering B1 land use at this boundary.
33	Renewable energy provision should be subject to EIA and public consultation where appropriate.		This will be dealt with at planning application stage, where appropriate. Not all such projects will require EIA, depending on their scale and impact.
34	In residential areas care needs to be taken to ensure that proposals for the development of an evening economy do not impact on communities' quality of life.	Core Strategy Policy CS01, CS13 and CS22.	This is a 'local centre' and it must perform a role in providing for a mix of uses and not a monochrome housing estate.
35	An assessment needs to be undertaken to ensure that no net environmental loss takes place. Where there are ecological effects, pro-active measures should be taken to improve the environment on adjacent land.		NP01 proposes several specific biodiversity actions. Application will be subject to EIA, which will include and ecology impact assessment. Core Strategy Policy CS19 provides appropriate policy framework.

	SEA/SA Recommendation	Response	Comment
36	It would be desirable to consider introducing a buffer zone around the Chelson Meadow Waste Management Site to ensure no negative impacts from the adjacent site.	See Policy NP01.61	It is not possible to define a mapped buffer zone as the width of the buffer can not be prescribed or evidenced. The Policy framework allows for appropriate response to the relationship between land uses. The Proposal and the design issues map indicate a buffering B1 land use at this boundary.
37	In accordance with the Plymouth City Council Strategic Flood Risk Assessment development should occur away from areas of the site at risk from flooding unless improvements to shoreline defences take place.	See Core Strategy policy CS21	
38	The impact of wind turbines in the proximity of the site should be carefully considered and should be subject to EIA and public consultation.		The plan does not include any specific proposals for wind turbines. The plan provides an appropriate policy framework (together with draft RSS policy) to consider the impacts of any such development proposals.
39	Consideration should be paid as to the impacts of new developments on traffic, waste management and access to local amenities and employment.	See relevant chapters of the Core Strategy, which provide an appropriate policy framework that addresses these issues.	

	SEA/SA Recommendation	Response	Comment
40	In addition to the recommendations provided by the previous SA/SEA on Preferred Option Policy 10, environmental assessment should be carried out for infrastructure improvements where appropriate to ensure that any short term environmental impacts are minimised as far as possible.	.	Environmental impact assessments of individual schemes will be undertaken where appropriate (depending on scale and impact) at the project level
41	It is important that the necessary resources are committed by the City Council or others to support the required level of visitor management and maintenance of open space.	See NP01.24 and NP 11.1.	