



Plymouth Sound & Estuaries Coastal Planning Study

Project Report

Tamar Estuaries Consultative Forum

September 2006

Final Report

9R8241



A COMPANY OF



ROYAL HASKONING

**HASKONING UK LTD.
ENVIRONMENT**

Elizabeth House
Emperor Way
Exeter, Devon EX1 3QS
United Kingdom

+44 (0)1392 447999 Telephone

Fax

info@exeter.royalhaskoning.com E-mail

www.royalhaskoning.com Internet

Document title Plymouth Sound & Estuaries Coastal
Planning Study
Project Report

Document short title

Status Final Report

Date September 2006

Project name Plymouth Sound & Estuaries Coastal
Planning Study

Project number 9R8241

Client Tamar Estuaries Consultative Forum

Reference 9R8241/R/CRJ/Exet

Drafted by Caroline James, Nicola White and Mat Cork

Checked by Christa Upjohn

Date/initials check

Approved by Mat Cork

Date/initials approval

CONTENTS

	Page
1 INTRODUCTION	1
1.1 Background	1
1.2 Scope of the project	1
1.3 Structure of the report	2
2 METHODOLOGY	4
2.1 Approach to the project	4
2.2 Stage one – ecological review	5
2.3 Stage two – analysis	5
2.4 Workshop	5
3 NATURE CONSERVATION INTERESTS	7
3.1 General introduction	7
3.2 Nature conservation designations	7
3.3 Non-designated interests	11
3.4 Current management issues	12
4 POLICY AND DEVELOPMENT SUMMARY	14
4.1 National guidance – Planning Policy Statement 9 (PPS 9): biological and geological conservation	14
4.2 Regional guidance	15
4.3 County guidance	19
4.4 Local guidance	22
4.5 Summary of regional and county guidance	26
5 ANALYSIS OF KEY DEVELOPMENT ISSUES	28
6 PLANNING GUIDANCE RECOMMENDATIONS	35
6.1 Recommendations for forward planning policy	35
6.1.1 Checklist of estuary conservation issues	35
6.1.2 The role of sustainability appraisal in protecting the estuary	37
6.1.3 Monitoring of the implementation of land-use plans	38
6.2 Guidance for development control	39
6.2.1 Consultation	39
6.3 Cumulative and in-combination effects	40
6.3.1 Introduction	40
6.3.2 Methodology for cumulative impact assessment	41
6.4 Consents for development within the coastal zone	42
7 CONCLUSIONS	47
8 BIBLIOGRAPHY	49

List of Appendices

- Appendix 1 Workshop Minutes
- Appendix 2 Policy Analysis
- Appendix 3 Guidance for Consultation

1 INTRODUCTION

1.1 Background

The Rivers Tamar, Lynher, Tavy, Plym and Yealm make up the largest estuarine system in southwest England, and is home to over 400,000 people in the catchments and large numbers of visiting recreational users. The area supports landscape and biodiversity assets of national and international value. As well as the Plymouth Sound & Estuaries Special Area of Conservation (SAC) and the Tamar Estuaries Complex Special Protection Area (SPA), much of the area is also notified as Sites of Special Scientific Interest (SSSI). The Tamar river valley, together with the River Lynher and River Tavy, is classified by the Countryside Agency as an Area of Outstanding Natural Beauty (AONB). It also includes Europe's largest military port, three commercial harbour authorities, five international marinas, 26 boat yards, four local authorities and two county councils.

The Regional Assembly has earmarked the area (Plymouth, south east Cornwall & south west Devon) for high growth, coupled with high urban concentration, during the period leading up to 2026. This scenario includes the building of up to 37,000 new homes and the generation of 42,000 new jobs for a population moving towards 300,000 by 2030.

These trends will bring increased development pressure within the coastal zone of Plymouth Sound & Estuaries. There is a need therefore to ensure that the estuaries nature conservation assets are given due consideration in the making of these planning decisions.

The aims of this project were to produce planning related guidance on coastal development and biodiversity, taking into consideration the estuaries nature conservation value. The aim of the guidance was to provide locally focussed, evidence based planning guidance for use by the authorities with jurisdiction over the study area. The hope is that local authorities will integrate this guidance into their emerging Local Development Frameworks (LDF). The project has been undertaken on behalf of the Tamar Estuaries Consultative Forum¹ (TECF).

1.2 Scope of the project

The study area for the project comprised the tidal extents of the Yealm, Plym, Tamar, Lynher and Tavy, plus an appropriate area inland to cover developments which may impact on estuarine ecology (**Figure 1**). The study area extends out to sea as far as a line between Rame Head and Gara Point.

The focus of this study has been the implications of development on the nature conservation interests of the Sound and estuaries. It is recognised that the estuary is

¹ The Tamar Estuaries Consultative Forum is a partnership that acts as a vehicle for co-operation and delivery in a working environment characterised by shared and overlapping interests and responsibilities. It facilitates co-operation and consultation in the performance of statutory duties and provide a clear mechanism for communication between the wide-ranging interest groups and decision-makers.

also within several AONBs, but effects upon landscape features are outside the scope of this project.

The study has considered the direct, indirect and cumulative effects of development within the shoreside, intertidal and subtidal zones. Subtidal developments have been limited to those that are directly linked to intertidal or shore-based developments. The outputs of this study are intended for use by local authorities. The focus has therefore been on development and activities which are under control of the planning regime. Where activities have been identified which are potentially damaging but are beyond the control the planning system, these have been noted, but they were not the primary focus of this study.

1.3 Structure of the report

This report documents the methodology and findings of the coastal planning study. It documents the evidence base that was used to develop the planning guidance. Accompanying this report is a summary document called “Key Guidance” which summarises the main findings of the study. The “Key Guidance” document forms the key output of this study and it is hoped that this information will be used in the development of LDFs by the local authorities.

Following this introduction, Section 2 details the methodology of the study, including an account of the workshop that was carried out. Section 3 provides a summary of the nature conservation interests of the site. This is provided as background information on important features of the estuaries and sound.

Section 4 contains a summary of the planning policy in relation to coastal developments within the study area. A summary of anticipated levels and forms of development is also provided. An analysis of the key issues is presented in Section 5. Recommendations from the project are presented in Section 6 which details suggestions for planning policy and also the integration of nature conservation into the planning policy framework. The key conclusions are presented in Section 7.

Insert figure 1
(A4)

Insert figure 1
(A4)

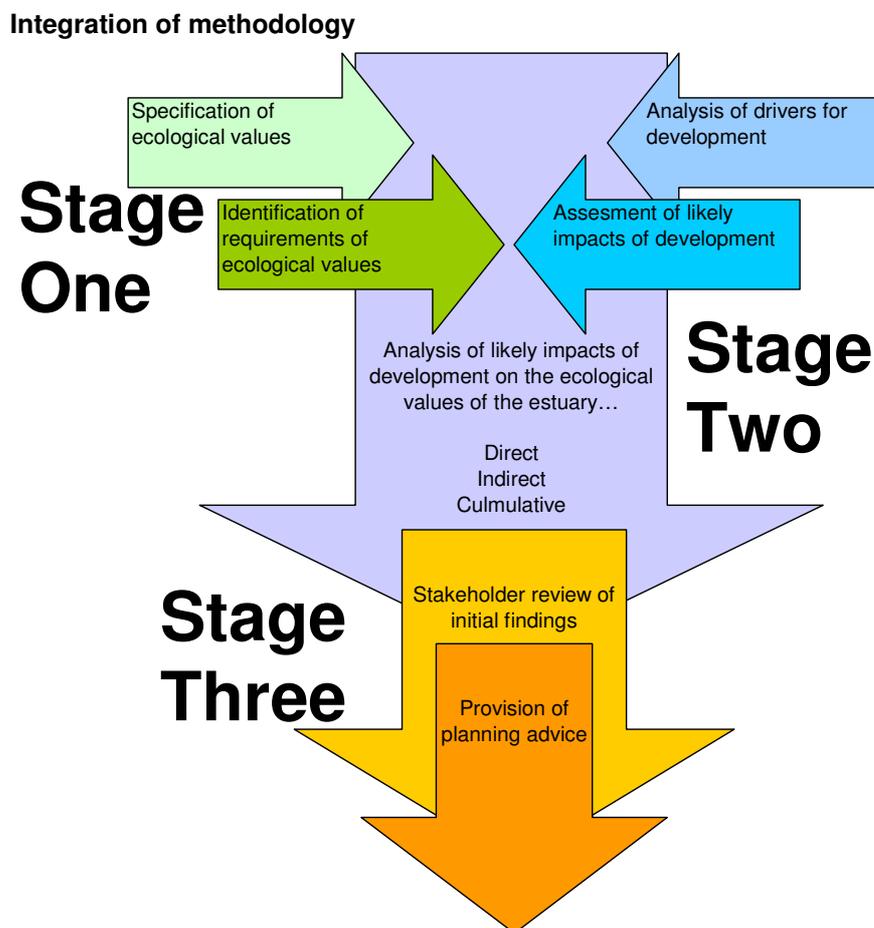
2 METHODOLOGY

2.1 Approach to the project

The intent of this work is to ensure that the nature conservation interests of the estuary (and coastal environs) are recognised and then protected by the planning system in response to anticipated local development. The approach to this task has been to:

- Review the nature conservation interests of the estuary and establish the sensitivities of the area to development;
- To establish the existing policy base and anticipated levels and forms of development;
- To evaluate developments with regard to their impacts on the ecology of the estuaries and sound; and
- To provide guidance on how the planning system can actively ensure that the Plymouth area can grow and develop as anticipated whilst the nature conservation values are maintained.

This approach is illustrated in the following diagram with each of the stages described in more detail below.



2.2 Stage one – ecological review

The core tasks within stage one were:

1. Collation of information on designated sites within the study area (ranging from international and European designations to Local Nature Reserves);
2. Collation of information on non-designated ecological features, for example species within the UK's Biodiversity Action Plan (BAP);
3. An assessment of all information available in regard to the condition of the sites and species identified in 1 and 2 above;
4. Assessment of the sensitivities and threats to identified habitats and species, and
5. Specification of gaps in knowledge in regard to the condition, status, requirements or threats of the areas ecological values.

2.3 Stage two – analysis

The core tasks within stage two were:

1. Identification of key development policy within the study area;
2. Clarification of the potential spatial implementation of such policy (the likely locations for new development etc);
3. Specification of the broader impacts of overall levels of development (e.g. the impacts on water-based recreational patterns and levels);
4. An assessment of the potential impacts of development policy in regard to their direct, indirect and cumulative impacts for each ecological value that such policy is likely to effect; and
5. The specification of potential measures to reduce or mitigate adverse impacts.

The critical focus of this stage was to define and describe relevant development policy and relate this to its likely impacts on the ecology of the estuaries outlined in stage one. A desk-based assessment was made of all relevant national, regional and local policy which seeks to influence development within the study area. Telephone calls were then made to individual planning officers to discuss the locations and types of development that are likely to occur within the study area. This was valuable in obtaining anecdotal information on the predicted levels of development. From this, an initial determination was made of the likely impacts of such policies on the ecological requirements identified in stage one. Due regard has been given here to the Office of the Deputy Prime Minister (ODPM) guidance on Sustainability Appraisal and Strategic Environmental Assessment.

2.4 Workshop

In order to facilitate consultation with stakeholders on the proposed guidance, a workshop was held on the 15th March 2006. The aim of the workshop was to discuss the development pressures and threats that are being placed on the Sound and estuaries. Within this context, methods of ensuring that the nature conservation interests are given due regard in planning policy and decisions were suggested. A copy of the workshop minutes are presented in **Appendix 1**.

Through the use of maps and post-it notes, a clear idea of forthcoming development within the Plymouth area was obtained. It was noted that there is an increasing trend for

small scale developments around the estuary potentially resulting in a loss of foreshore e.g. construction of slipways, waterfront developments, coastal defences and pontoons. Whilst these developments may have little impact in isolation, the cumulative impacts may be significant when considered in-combination with other intertidal development. A summary of the developments identified are presented in Section 4.

During the workshop, it was identified that local authority planning departments would benefit from the following information:

- A list of the various consents that are required for development within the coastal zone;
- Guidance on which public body is responsible for consenting developments (i.e. who is the competent authority);
- Guidance on the organisations that should be consulted on development applications;
- An easy understandable matrix of environmental impacts associated with coastal development; and
- Guidance on assessing the cumulative effects of development.

As a result of the workshop, advice on these aspects has been included within this planning guidance report.

3 NATURE CONSERVATION INTERESTS

3.1 General introduction

Plymouth Sound and its associated tributaries comprise a complex suite of marine inlets. The ria systems entering Plymouth Sound (St John's Lake and parts of the Tavy, Tamar and Lynher), the large bay of the Sound itself, Wembury Bay, and the ria of the River Yealm are of international marine conservation importance because of their wide variety of salinity conditions and sedimentary and reef habitats. The high diversity of habitats and conditions gives rise to communities both representative of ria systems and some very unusual features, including abundant southern Mediterranean-Atlantic species rarely found in Britain. The estuary contains a series of nature conservation designations which are summarised below and illustrated in **Figure 2**.

Nature conservation areas can be designated at a variety of levels. European designations such as SPAs and SACs are implemented in the UK by the Conservation (Natural Habitats &c) Regulations 1994 which transpose the EC Directives 79/409 and 92/43/EEC. Sites of Special Scientific Interest (SSSI) are national-level designations notified under the Wildlife and Countryside Act 1981. Whilst all areas are designated for important ecological features, it should be noted that planning policies for internationally designated areas (i.e. SACs, SPAs) are more stringent than for nationally important areas (i.e. SSSIs). Local Nature Reserves (LNRs) also exist which are a statutory designation made under Section 21 of the National Parks and Access to the Countryside Act 1949. They are places with wildlife or geological features that are of special interest locally. County Wildlife Sites are also non-statutory designations for sites of county significance for wildlife or geology and are designated by local authorities.

It should be noted that the Plymouth Sound and estuaries has been very well studied over the last 100 years and a raft of publications exist on the ecology of the area. The aim of this section is to provide a high-level summary of the features of the estuary. A more detailed review was carried out on behalf of TECF in 1999 which should be referred to for more information on key species (Nature Conservation Review, 1999).

3.2 Nature conservation designations

Plymouth Sound & Estuaries SAC – Covering 6402.3 hectares, Plymouth Sound and its associated tributaries constitute one of the finest extensive ria systems in Britain. They have been designated as a SAC under the EU Habitats Directive. The area is particularly significant in terms of marine wildlife and is of international marine conservation importance because of the wide variety of salinity conditions, sedimentary and reef habitats. The high diversity of habitats with an extremely rich flora and fauna have been recorded with a number of plant and animal species being notable for their rarity or as examples of natural marine communities. The primary reasons for the selection of this site as a European Marine Site are related to the following Annex I Habitats and Annex II species which are present:

- Sandbanks which are slightly covered by seawater all the time
- Estuaries
- Large shallow inlets and bays
- Reefs

Figure 2
(A3)

- Atlantic Salt Meadows (*Glauco-Puccinellietalia maritimae*)
- Shore dock (*Rumex rupestris*)

'Mudflats and sandflats not covered by seawater at low tide' are also present although this habitat is not a primary reason for selection of this site. The Allis shad (*Alosa alosa*) is also present as a qualifying feature.

Tamar Estuaries Complex SPA - Classified in 1997, the Tamar Estuary system is a large marine inlet comprising the estuaries of the rivers Tamar, Lynher and Tavy which collectively drain an extensive part of Devon and Cornwall. The Tamar river and its tributaries provide the main input of freshwater into the estuary complex, and form a ria with Plymouth lying on the eastern shore. The broader lower reaches of the rivers form extensive tidal mudflats bordered by saltmarsh communities. The mudflats support a varied infaunal community rich in bivalves and other invertebrates, and feeding grounds for waterbirds in numbers of European importance. The areas of saltmarsh are also important roosting areas for large numbers of wintering and passage birds. The site qualifies as an SPA by supporting populations of European importance of the following Annex I species from the Directive (79/409/EEC):

- little egret *Egretta garzetta* - ~9% passage population in the UK & 8.4% wintering population; and
- avocet *Recurvirostra avosetta* - ~15.8% of the wintering population in the UK.

The SAC and SPA are collectively known as the European Marine Site. A scheme of management exists for the European Marine Site as well as a Regulation 33 document which provide guidance on which type of activities are likely to damage the site.

Tamar-Tavy Estuary SSSI – this site includes the previously notified Warleigh Point SSSI. The Tamar-Tavy Estuary SSSI comprises the upper reaches of the Tamar Estuary system, from the Tamar Bridge upstream to the limits of the tidal influence in both rivers and the Kingsmill and Tamerton Lakes. The site supports a nationally important population of avocet and encompasses a section of the Tamar that is considered to be of national importance for its marine biological interest. The site includes estuarine habitats, with uncommon species, that are notable in their extent and also supports the only British population of the triangular club-rush. Several areas of semi-natural woodland of ancient character are included in the site. Warleigh Point is a typical western oak wood and is one of the best examples in Devon of such woodland in a coastal location. Sessile oak (*Quercus petraea*) dominates the canopy and occasionally there are examples of wild service tree (*Sorbus torminalis*), which is very local in its distribution in Devon.

Plymouth Sound Shore & Cliffs SSSI – Plymouth Sound is an open bay into which run several estuaries forming a complex ria system. The coastline of the Sound is steeply sloping and rocky, especially to either side of the mouth. Several major ecological zones have been identified for the Sound and its tributaries. This SSSI encompasses examples from the open coast and sheltered bay parts of the system, and includes shore communities with a south western influence.

Western King SSSI – this SSSI is designated for earth heritage interests. The section of cliff exposes a series of Devonian limestones, of late Frasian to early Fammenian

age, which comprise the youngest limestone of the Plymouth Limestone Group. They contain an important fauna of microfossils, known as conodonts, which are used to subdivide the rock sequence and relate it to comparable sequences elsewhere. Western King is also of considerable historical interest since some of the earliest studies on British fossil corals of Devonian age were carried out here. This site also includes an area of amenity grassland that supports colonies of the nationally rare field eryngo *Eryngium campestre*.

St John's Lake SSSI – this site lies directly south of Torpoint and forms part of the Tamar-Lynher estuarine system. At low tide, extensive mudflats are exposed providing important feeding grounds for large populations of wintering wildfowl and waders. The lake has interesting areas of species-rich saltmarsh, and the underlying Devonian slates form fringing shingle beaches and shallow rock cliffs supporting stunted trees and scrub. Although much of the site is bare mud, there are considerable areas covered with the green alga *Enteromorpha* and beds of the rare narrow leaved eel grass *Zostera angustifolia* and the eelgrass *Zostera noltii*.

Rame Head & Whitsand Bay SSSI – this site extends for approximately 8 km along the south Cornwall coast from the east side of Rame Head to Oldhouse Cove, near Portwrinkle in the west. The coastal cliff habitats are of particular importance for the occurrence of the largest colony of the rare shore dock *Rumex rupestris* in mainland Britain. In addition, the site also supports significant populations of other rare plant species including the nationally rare slender bird's-foot-trefoil *Lotus angustissimus* and early meadow grass *Poa infirma*.

Kingsand to Sandway Point SSSI – the rock platform along the Kingsand beach section is the only exposure in the south west England of an extrusive rhyolite flow of Permian age. Its significance lies in the strong possibility that it is representative of suprabatholithic volcanic activity after the emplacement of the Cornubian granites. This is the only *in situ* example of extensively early Permian volcanicity that is now largely seen as pebbles in the New Red Sandstone denudation products.

Wembury Point SSSI – this site falls within the South Devon AONB. It comprises extensive reefs of interest for their intertidal plant and animal communities together with coastal sand, shingle and steep slopes of sea-cliff grassland and mixed scrub. It is also of interest for the diversity of passage and wintering birds it supports and for nesting species associated with the scrub; at least one nationally rare species of bird breeds on the site. The landform itself is also of interest, displaying a wave-cut platform, head terrace and degraded fossil cliffline.

Yealm Estuary SSSI – the Yealm estuary enters the sea at Wembury Bay. It is an example of a ria which shows a transition to estuarine conditions to upper reaches. A sand bar at the entrance provides some shelter from the prevailing south westerly winds and there is a diverse range of biological communities, reflecting the influence of marine conditions far up the inlet.

Wembury Voluntary Marine Conservation Area (VMCA) – This area was established in 1981 by Devon Wildlife Trust in recognition of the important marine communities supported, and the need to safeguard these communities from recreational and commercial activities. The VMCA is a non-statutory designation made over areas of

significant marine wildlife value in consultation with interested parties. The Wembury VMCA extends along the coast from the mouth of the Yealm to Plymouth Sound and includes the cliffs and shore to approximately the 10m depth contour. The Wembury VMCA is managed by the Devon Wildlife Trust and a warden presence is maintained from April to September at the Wembury Marine Centre.

Although there are several Local Nature Reserves within the Plymouth area, none of them cover the intertidal or subtidal areas of the study site.

There are a range of County Wildlife Sites (CWS) within the boundaries of Plymouth Sound & Estuaries SAC, covering approximately 767 hectares. However, only the Warren at Noss Mayo, the Yealm Estuary, Jennycliff, Bovisand and the Plym Estuary (proposed CWS) are directly connected to the coastal environment. Most of the CWSs cover areas of ancient semi-natural woodland, and unimproved and semi-improved grassland.

There are also a number of Local Wildlife Sites within the study area; these are of significant wildlife interest within a local context that do not reach the criteria for County Wildlife Sites. These are not covered by PPS9 although they can be included in Local Plans. There are 11 in total within the boundaries of Plymouth Sound and estuaries SAC covering approximately 60 hectares. None of these Local Wildlife Sites contain coastal or marine interests.

Warleigh Point Devon Wildlife Trust Reserve covers 34ha within the study area, and is one of the finest examples of coastal oak woods in Devon. It is sited on the banks of the Tamar-Tavy estuary and is managed for wildlife by the Devon Wildlife Trust.

Cornwall Wildlife Trust manage Churchtown Farm Community Nature Reserve near Saltash. This site contains mudflats and covers 61 ha. The Trust have also designated the Tamar Estuary as a Nature Reserve

3.3 Non-designated interests

In addition to the designated features of the estuary mentioned above, a series of important habitats and species are present within the study area, which are not necessarily included within the above designations.

The estuaries contain a range of rare and unusual species. Many of these are BAP species or habitats. The UK BAP was set up in response to the Convention on Biological Diversity at the 1992 'Earth Summit'. One of the key requirements of this was for governments to 'develop national strategies, plans or programmes for the conservation and sustainable use of biological diversity'. In 1994, the Government published 'Biodiversity: the UK Action Plan' which detailed the habitats and species targeted for protection and some of these are found within the Plymouth Sound and estuaries. Both Cornwall and Devon County Councils have Local Area Biodiversity Action Plans in place, identifying priority habitats and protected species. The priority habitats identified within the study area are:

- Maritime cliff and slope
- Mudflats
- Coastal & floodplain grazing marsh

- Saline lagoon
- Lowland beech and yew woodland
- Lowland mixed deciduous woodland
- Lowland meadows
- Lowland heathland

There are a number of species that are not necessarily designated but are important to Plymouth Sound and the Estuaries, some examples (along with a description of any designations) are given below. It should be noted that in addition to these species, the estuaries also support a wide range of common place wildlife of local interest which help maintain a healthy ecosystem and contribute to the overall diversity of the site.

- Eel grass, *Zostera marina* – Listed on Appendix 1 of the Bern Convention and on the IUCN Red list of globally threatened species
- Fan mussel *Atrina fragilis* - Listed on Schedule 5 of the Wildlife and Countryside Act and a BAP priority species.
- Native oyster *Ostrea edulis* - a BAP priority species
- Otter *Lutra lutra* – Listed on Annex 2 and 4 of the Habitats Directive, Schedule 5 of the Wildlife and Countryside Act 1981, BAP priority species, Appendix 2 of the Bern Convention
- Kingfisher *Alcedo atthis* – Listed on Schedule 1 of the Wildlife and Countryside Act 1981, Annex 1 Bird Directive, Appendix 2 of the Bern Convention, Amber status on the Red listed and rare species.
- Greater horseshoe bat *Rhinolophus ferrumequinum* - Listed on Annex 2 and 4 of the Habitats Directive, Schedule 5 of the Wildlife and Countryside Act 1981, priority BAP species, Appendix 2 of the Bern Convention.
- Little egret, *Egretta garzetta* – Listed on Annex 1 of the Birds Directive, Appendix 2 of the Bern Convention, amber status on the Red listed and rare species.
- Avocet, *Recurvirostra avosetta* - Listed on Annex 1 of the Birds Directive, Appendix 2 of the Bern Convention, Schedule 1 of the Wildlife and Countryside Act 1981, amber status on the Red listed and rare species.
- Carpet coral, *Hoplania durotrix* – a nationally rare marine species
- Sea slug, *Okenia elegans*– Nationally rare marine species
- Trumpet anemone, *Aiptasia mutabilis* – a nationally scarce marine species
- Shore dock, *Rumex rupestris* - a priority BAP species, Appendix 1 of the Bern Convention, Annex 2 and 4 of the Habitats Directive, Schedule 8 of the Wildlife and Countryside Act, endangered on the UNCN Red list.
- Allis shad, *Alosa alosa* – Listed on Annex 2 of the Habitats Directive, Schedule 5 of the Wildlife and Countryside Act, priority BAP species.

Further detailed information on key species within the estuary is provided in TECF (1999).

3.4 Current management issues

A number of studies have been carried out in recent years which have examined key conservation issues within the Sound and estuaries. In particular the Plymouth Sound and estuaries European Marine Site Management Scheme (TECF, 2001) has identified key management issues. A detailed review of water and sediment quality has also been carried out on behalf of Environment Agency and English Nature (Langston *et al.*, 2003).

Presented below is a summary of the key issues affecting the health of the habitats and species within the Sound and estuaries (Plymouth Sound and Estuaries European Marine Site Management Scheme, 2001):

- Physical loss – physical loss of estuary habitat has occurred from intertidal land claim. A study carried out in 1999 assessed the extent of land claim since 1750 (TECF, 1999). This study found that around 650 ha of land has been lost since 1750, with the vast majority lost between 1750 and 1850. Land claim remains a threat, particularly from the potential cumulative effects of many small scale developments e.g. jetties, boatyards, single dwellings etc.
- Physical damage – physical damage to eelgrass occurs from anchoring within the eelgrass beds at the mouth of the Yealm. The eelgrasses are a feature of the SSSI in that area and their continued damage is a problem. Physical damage to seabed habitats within the study area can also occur from bottom trawling and also from maintenance and capital dredging. A desk study on dredging within the estuary was carried out by Plymouth Marine Applications in 2004.
- Toxic Contamination - organotins (e.g. TBT), metals (especially As, Cu, XCd, Hg, Zn) and resuspension of contaminated sediments (Langston *et al*, 2003).
- Non-Toxic Contamination - increased nutrient levels as a result of diffuse sources e.g. agricultural runoff and radionucleides from the dockyard (Langston *et al*, 2003).
- Low dissolved oxygen - recorded in the upper Tamar and resulted in fish kills. This has been related to natural low flows at particular times of year.
- Biological disturbance – A range of biological disturbance issues currently exist within the study site through bait collection, species extraction (peeler crab) and the introduction of non-native species (Japanese knotweed *Sargassum muticum*) (English Nature, 1999).

English Nature assesses the condition of the SSSIs at regular intervals. In 2005, only five of the SSSIs within the study area had units that were considered to be in unfavourable condition. Of these, none of the units which were in unfavourable condition contained marine habitats.

4 POLICY AND DEVELOPMENT SUMMARY

The intent of this study was to produce guidance on the development of land around the estuary whilst protecting the nature conservation interests of the area. A fundamental step in this process was to identify the likely form and amount of development around the estuary over coming years. This section provides a summary of the location and scale of development identified in current and emerging policy documents (supported by the workshops).

Planning policy guidance exists at a number of levels, each governed and written by a different authoritative body. The different levels are summarised below.

- National guidance is set by central government and should be enforced by all regional and local authorities in the UK.
- Regional guidance (e.g. for the south west) is developed by regional Government and is adopted policy only within the regions where it is developed. All local authorities are subject to regional guidance.
- Local guidance is developed by local authorities and is adopted only within the administrative boundaries of the specific authority. Any guidance produced by district councils fall into this category.

This section provides a focussed summary of emerging policy (at each of the above levels) which will provide the framework for growth in the coming decade. It demonstrates the following:

1. Quantification of the scale and location of overall levels of development;
2. The identification of site specific locations for development; and
3. Assessment of the existing provision of environmental policy which recognises the value of the estuary and offers policy protection for nature conservation interests.

From this, the potential impacts of predicted scales and location of development have been related explicitly to the ecology of the Sound and estuaries (see Section 6).

4.1 National guidance – Planning Policy Statement 9 (PPS 9): biological and geological conservation

PPS 9 sets out planning policies on protection of biodiversity and geological conservation through the planning system. PPS 9 replaces *Planning Policy Guidance Note 9 (PPG 9) on nature conservation* published in October 1994. Most of the policies in PPS9 are based on existing policies in PPG9, updated as appropriate, and continue to reflect statutory obligations for nature conservation. There is a clearer focus on the need to conserve, enhance and restore biological and geological diversity.

PPS 9 sets out six key principles for regional and local planning bodies to adhere to, thus ensuring that the potential impacts of planning decisions on biodiversity and geological conservation are fully considered.

- Development plan policies and planning decisions should be based on up-to-date information about the environmental characteristics of their areas. Local

authorities should also assess the potential to sustain and enhance these resources.

- Plan policies and planning decisions should aim to maintain, and enhance, restore or add to biodiversity and geological conservation interests.
- Plan policies on the form and location of development should take a strategic approach to the conservation, enhancement and restoration of biodiversity and geology, and recognise the contributions that sites, areas and features, both individually and in combination, make to conserving these resources.
- Plan policies should promote opportunities for the incorporation of beneficial biodiversity and geological features within the design of development.
- Development proposals where the principal objective is to conserve or enhance biodiversity and geological conservation interests should be permitted.
- The aim of planning decisions should be to prevent harm to biodiversity and geological conservation interests. Where granting planning permission would result in significant harm to those interests, local planning authorities will need to be satisfied that the development cannot reasonably be located on any alternative sites that would result in less or no harm. In the absence of any such alternatives, adequate mitigation measures should be put in place. Where a planning decision cannot be prevented or adequately mitigated against, appropriate compensation measures should be sought. If that significant harm cannot be prevented, adequately mitigated against, or compensated for then planning permission should be refused.

4.2 Regional guidance

A wide range of issues or topic specific regional guidance exists for the south west. The region is unique in many ways, given its peninsular location and range of national and internationally important nature conservation values (marine, coastal and terrestrial) and the anticipated levels of growth in the coming decade. This regional policy review has focused on the provisions of the emerging Regional Spatial Strategy (RSS), since this provides a summary of existing policy under the terms of Regional Planning Guidance for the south west (RPG 10) and offers an updated policy suite to 2016.

RSS for the South West

The RSS provides the regional focus for policy provision, and encompasses within this a spatial strategy for the region. The latest version of this document has been used at the time of writing this report – RSS 4.1.

Development based policy

Section 3 of the RSS provides specific guidance relating to the scale and location of development within the region. Within this, Section 3.1.2 identifies that the intent is to deliver more sustainable communities within the region, and this is specified as resulting in:

“significant change at 22 Strategically Significant Cities and Towns (SSCT’s) in order to support their economic and service role and regeneration”

Section 3.3.2 then goes on to clearly identify Plymouth as a SSCT, which is critical to the economic buoyancy and growth of the region. The broad aims for the SSCT’s are specified as the intent to:

- Improve the quality of the urban environment, including the setting and surroundings of cities and towns, the quality of new development and the public realm, and reduced pollution and blight;
- Promote social cohesion through access to, and provision of, good social and community facilities and services, such as hospitals, schools, higher education, cultural, leisure and neighbourhood facilities, to create healthy and secure living conditions, based on improving standards of provision;
- Support the economy by enhancing educational achievement and skills, and by providing for a range of premises and land (including strategically important sites) to meet the changing needs of sectors, in a way that complements and helps to implement the RES;
- Secure fundamental improvements to public transport, traffic management and use of road space to tackle congestion and poor air quality in many urban areas;
- Make the best use of land for housing, economic development and other infrastructure by assisting redevelopment, regeneration and the provision of urban extensions in an integrated and sustainable way;
- Ensure that where 'dormitory' relationships exist between the SSCT and other towns and villages this is not exacerbated by the development proposals contained in LDDs.

The intent of the RSS is therefore to provide a strategic spatial base to regional growth, to ensure that growth areas (and levels) are identified and managed in a manner which provides sustainable communities which retain their inherent local strengths and character.

The manner in which this relates to the study area is specified in Section 4.4 which relates to the Western Peninsular Area. The Plymouth Sound and estuaries are located within this area and Plymouth and its role as a SSCT is addressed in a series of policies. In determining the impacts of future development around the Sound and estuaries, it is essential to have an understanding of the spatial approaches to the area as a whole, which may impact estuary values. RSS Policies SR31 to SR34 provide this policy base. An examination of these policies is therefore central to determining the level and form of development that is anticipated around the estuary.

SR32 In the western part of the Peninsula, the strategic emphasis is to stimulate economic activity in the SSCTs and the remoter rural area bordering the north coast of Cornwall, Devon and Somerset to develop and improve the roles of the SSCTs as service and employment centres, enhancing regional prosperity and supporting regeneration. Specifically at Plymouth, measures will be taken to transform and revitalise the city for significant growth in economic activity and housing, in order for the city to realise its potential and enhance its sub-regional role.

Policy therefore provides a clear specification of the role of Plymouth as SSCT, and the subsequent policies then provide the detail regarding how the spatial development of Plymouth should be focused.

SR33 Devon and Cornwall County Councils, Caradon and South Hams District Councils, Plymouth City Council, West Devon Borough Council and the Dartmoor National Park Authority should plan for the balanced growth of Plymouth, South East Cornwall and South East Devon area, maximising

the use of previously developed land and bringing forward strategic urban extensions at Plymouth, and taking account of the role and potential for balanced growth of other towns in the area. This will require cooperation, particularly at cross boundary locations, through joint work on LDDs, addressing the distribution of financial contributions arising from Section 106 agreements and other funding mechanisms to deliver key infrastructure.

Policy SR 33 provides a broad focus for the development of the Plymouth area, and places this in the context of surrounding local authorities, additionally this policy specifies an approach of accommodating expansion via the use of previously developed land to accommodate growth wherever possible. This policy also identifies the need for cross-boundary initiatives between authorities.

SR34 Local Authorities through their respective LDDs, along with regional/national partners and statutory organisations, should seek to provide a range of employment opportunities, services and facilities to facilitate greater investment in the physical fabric of the urban area, deliver a greater quantity of affordable housing, improve the retail performance and transform the City into a place where people want to live, work and relax. Collectively, all partners should strive to deliver a step change in performance at Plymouth.

Policy SR34 provides a focus on the provision of a range of sustainable services etc to accommodate the growth around Plymouth.

SR35 Plymouth's economy will be stimulated to enable a transformation of the City through the provision for job growth in the Plymouth TTWA of about 42,000 jobs over the plan period. Employment land provision of 150 hectares should be provided within and adjoining the Plymouth urban area over the plan period. Provision should be made for an average of about 1,575 dwellings per annum in the Plymouth area over the plan period, distributed as follows:

- Within or adjacent to Plymouth's urban area for about 24,500 dwellings (within its administrative area);
- A strategic urban extension east of Plymouth at the Sherford new community for about 5,500 dwellings (Area of search R) as shown on the Inset Diagram;
- Within and adjacent to Saltash and Torpoint about 1,000 dwellings (with an emphasis to meet local needs and support business and employment opportunities); and
- Limited allocations of about 500 dwellings in South Hams District adjoining Plymouth City's administrative area.

Policy SR35 specifies the anticipated levels of growth in and around the Plymouth. This policy offers the most critical direction in determining the impacts of the areas growth on the Sound and estuaries. In simple terms this policy suggests that the following are required by 2016 around the Sound and estuaries:

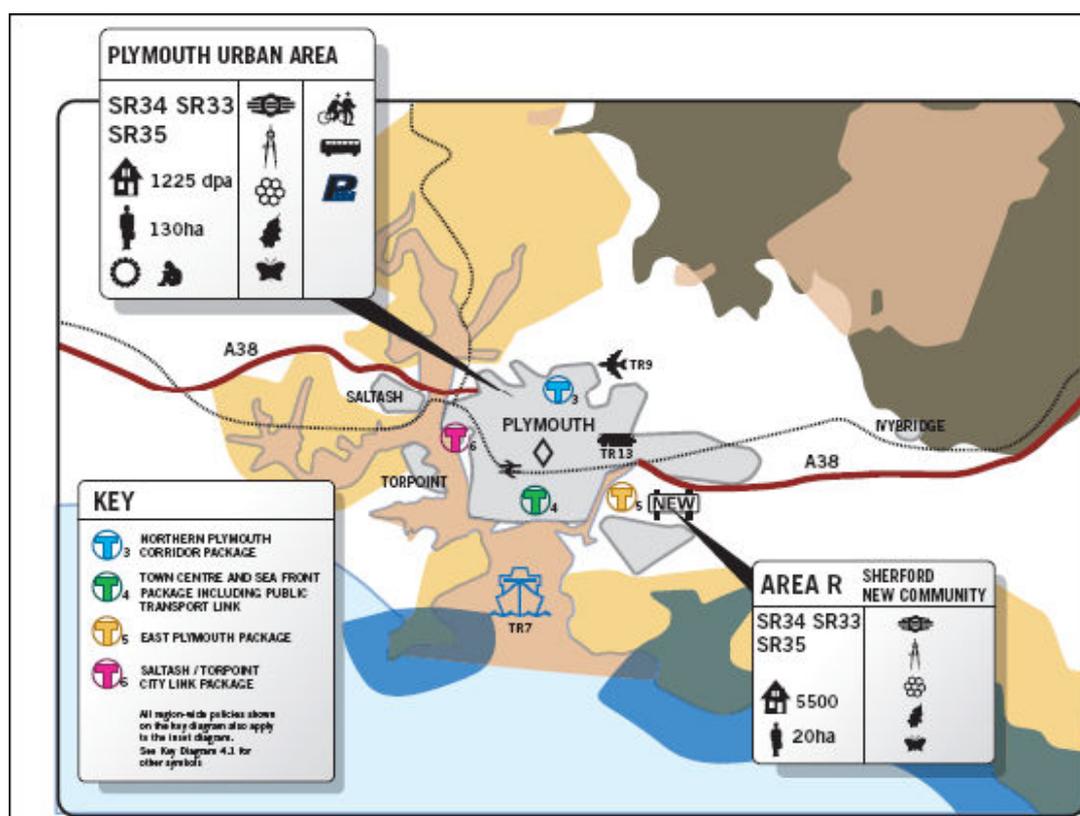
- Creation of 42,000 jobs;

- Provision of 150ha of employment land;
- Land allocation for 1,575 dwellings per annum;
- The provision of a new sustainable community at Sherford (5500 houses).

Table 4.1 RSS housing and employment provision to 2016

Area	Dwellings - Annual Average	Employment (Ha)
Plymouth Area	1575	150

The spatial representation of this is shown in the figure below from the RSS.



The RSS provides a clear focus in terms of the role of Plymouth and its anticipated patterns of growth. This growth is to be accommodated wherever possible on land which has been previously developed and providing maximum densities which also provide high quality built environment. The new settlement identified at Sherford, clearly provides a key focal point for development, however employment land and housing provision will also need to be provided around the city in order to meet the target figures.

Nature conservation policy

The nature conservation policy within the RSS is provided in Section 7 – Enhancing Distinctive Environments and Cultural Life.

Policy ENV1 provides direction on identifying the character and distinctiveness of the natural and built environment. The policy advocates positive management of such resources and the need to ensure that all options are considered before advocating

policy which would have an adverse impact on such values. Additionally, the value of international and European sites is identified in conservation initiatives.

Policy ENV4 relates specifically to nature conservation and offers a focus for the protection of distinctive habitats and species. Figure 7.3 of the RSS which accompanies this policy, also provides a regional representation of typical habitat distribution across the region (specified as Strategic Nature Areas – SNA's). Policies and proposals which support the management of these areas are encouraged under this policy.

Coastal Policy

Section 7.2.15 of the RSS provides coastal specific policy. Two policies are provided with an explicit coastal focus CO1 and CO2.

Policy CO1 Defining the Coastal Zone

This policy advocates the definition of the coastal zone by local authorities as being 'developed' and 'undeveloped' coast. Within the undeveloped coast a presumption against development is specified unless fulfils one of five suggested criteria. The specified relate to:

- Does not detract from the unspoilt character and appearance of the coast; and
- Is essential for the benefit of the wider community; or
- Is required to improve public access for informal recreation; or
- Is required to support the sustainable management of fisheries; and
- Cannot be accommodated reasonably outside the undeveloped coast zone.

Policy CO2 Coastal Planning

This policy advocates the principle of cross border planning to protect resources in the coastal strip, which is intended to secure sustainable management of the coastal zone.

4.3 County guidance

The structure plans for Devon and Cornwall offer countywide strategic planning guidance which has a similar timeline to that of the RSS. Although the Structure Plans remain an instrument of the previous planning system, their provisions have provided a focus for much of the existing and emerging development within the Counties. It is therefore worthwhile to provide an initial assessment of the measures contained within Structure Plan policy and the way in which they relate to levels of growth anticipated within the Plymouth area.

Cornwall County Council

The Cornwall Structure Plan 2004, provides the strategic policy base for the county to 2016. The plan applies to much of the western side of the estuary which covers Caradon District Council.

Nature Conservation and Maritime Resources Policy

The Cornwall Structure Plan provides policies for all aspects of the environment under the heading of 'Conservation Assets' including nature conservation and coastal policy. Policy ENV1 provides advice on maintaining the landscape character of the coast and countryside, and natural beauty of the undeveloped coast, through preventing significant adverse effects from development.

Policies ENV4 and ENV5 relate to statutory designations, both in terms of earth science value and biodiversity value. Designated sites and areas should not be damaged to a significant degree by development, and priority should be given to those sites with European designation. Development having either direct or indirect effects on these sites will be unacceptable unless there is an overriding public need. Where the site concerned hosts a priority natural habitat or species, development will not be permitted, unless it is necessary for reasons of public health/safety or for beneficial consequences of primary importance for nature conservation.

In addition, the Structure Plan includes policies which make reference to the maritime environment and the need to designate coastal zone in local development plans. Policy 4, Maritime Resources states:

- An integrated and co-ordinated approach to the coast will be taken to support the economic importance and conservation value of the maritime environment.
- Development relating to the coast, estuaries and maritime environment should be considered against the need to ensure the conservation of the environment for its own sake and for the economic importance of fishing and the other activities it supports. Development should avoid pollution of coastal or marine waters and minimise any harmful effects on coastal processes.
- Development should be within or well integrated with the existing developed coast and help enhance the quality of the environment and economic regeneration of the coastal towns. Waterside sites within the developed coast should be safeguarded for uses needing such locations giving priority to maritime industries.

Development Based Policy

Section 2 of the plan provides the Spatial Strategy for the county and Policy 24 within this section relates to the area covered by Caradon District Council, the South East Cornwall area, which includes the towns of Saltash and Torpoint. The provision of development within these areas is identified as being critical to the sustainable development of Plymouth, which in turn is recognised for its regional and sub-regional significance. The levels of development are specified as follows.

Table 4.2 Cornwall structure plan housing provision to 2016

Area	Dwellings
Torpoint & Saltash Area	1,000

Devon County Council

The Devon Structure Plan 2001 to 2016 (Adopted 2004) relate to the local government areas of Plymouth, West Devon and South Hams. The Devon Structure Plan therefore covers the entirety of the eastern side of the study area.

Nature Conservation Policy

The Conservation and Enhancement of the Devon Environment strategic aim is identified in the Structure Plan and covers all aspects of conservation of Devon's environment including the countryside, coasts, buildings and historic heritage.

Policy C7 provides protection for the Coastal Preservation Area by limiting development (other than of a minor nature) unless it is for the community at large and cannot be accommodated outside of the preservation area. It will only be permitted if it does not detract from the character of the coast.

Policy C13 promotes the sustainability of the biodiversity and earth science resource of Devon's natural environment. Policy C14 states that all statutory designated sites will be protected from development that will conflict with their conservation interests. Policy C15/16 relates to Local Plans defining sites of nature conservation importance. Policy C17 states that any development likely to have an adverse effect on a specially protected species should only be permitted where appropriate measures are taken to secure its protection.

Coastal Policy

Devon County Council's Maritime Role and Action Programme sets out the policy for planning and management of the coast at a Devon wide level and is structured around five-year priorities for action.

Maritime Policies 1 and 2 provide support for developments dependent on a coastal location, and regeneration of coastal towns, as long as they are environmentally sustainable. These policies aim to realise a prosperous and competitive coastal economy for all.

Maritime Policy 3 supports proposals that strengthen and resource the County Council's strategic role in oil spill contingency planning and its ability to respond in an emergency.

Maritime Policies 4 and 5 relate to transportation in terms of seasonal congestion and provision of alternative forms of transport in order to maintain an efficient integrated transport system that meets the needs of Devon, its coastal communities and visitors.

Maritime Policies 6-15 relate to protecting and sustaining Devon's environment, culture and heritage. These policies advocate spatial planning for sustainable development of the coast and marine resources, and support management partnerships that help to achieve these goals. Policies 9-12 promote the protection of Devon's biodiversity, earth heritage and archaeology, and particularly state that coastal processes should not be interfered with unless environmental damage can be mitigated against.

Development Based Policy

Section 3 of the Structure Plan "A Sustainable Strategy for Devon" provides a clear expression of the focus for growth within the country, and specifically around the Sound and estuaries.

Policy ST5 Development Priority 2001 to 2016 identifies Plymouth as a Principle Urban Area which requires a balanced approach to development, which meets sub-regional needs.

Section III of this section provides explicit guidance for the Western Sub Region which contains the Plymouth PUA at its heart. Policy ST6 the Plymouth Urban Area within this

section lists the priorities which should be considered in determining a spatial strategy for the area. The priorities listed relate to an intent to diversify the economy by providing a range of employment sites and ensuring that housing supply is provide commensurate with this. In this respect the aims, are broadly similar for the area for those specified within the RSS.

Policy ST7 Plymouth Housing and Employment Provision stipulates that for the period 2001 – 2016, 14,500 dwellings should be provided within the Plymouth PUA and 160ha of employment land allocated. Again these figures are broadly inline with the targets contained within the RSS. This policy also makes specific reference to the strategic employment site at Langage in South Hams DC which is set to provide 40ha of employment land.

Policy ST8 New Development at Sherford details the development proposal at Sherford that is also referred to in the RSS. The new Sherford Community is anticipated to provide at least 4000 dwellings, with associated employment land and a range of community and other associated community facilities.

Section IV Development Provision in Devon 2001 – 2016, specifies the overall levels of dwelling and employment land provision per local authority area. In regard to the local authorities in Devon around the Sound and estuaries, the following figures are suggested:

Table 4.3 Devon structure plan housing and employment provision 2001-2016

Local Authority	Dwellings	Annual Average	Employment (ha)
Plymouth	10,000	670	80
South Hams	8,350	560	105
West Devon	3,450	230	30
Total	21,800	1,460	215

4.4 Local guidance

Local Development Plans offer planning guidance at the local level, and contain specific policies designed for the local area. Some of the local authorities are in the process of producing LDFs whilst some still have Local Plans. These documents have been analysed to determine the coverage of policies for nature conservation and also protection of the coast. A copy of the relevant policies from the local plans of LDFs is provided in **Appendix 2**. A summary of these policies is presented below.

In addition, the local development plans have been analysed to determine the local areas of development within each district. This analysis was also informed through individual discussions with planning officers over the telephone and discussions during the workshops. The key development sites are described below and shown on **Figure 3**. Additionally, a detailed review of all policy relating to identified development has been provided in **Appendix 2**. It should be noted that in addition to the identified land allocations, many incremental infill developments are likely to occur.

Figure 3 (A3)

Plymouth City Council

Plymouth City Council have produced their Core Strategy Preferred Options as part of the second stage of preparing Plymouth's LDF. It built on the earlier issues and options consultation stage (Spring 2005). The preferred options report sets out for consultation the City Council's proposed policy directions, and highlights alternatives where appropriate. The LDF does not yet contain specific policies for nature conservation and the coasts and therefore the Local Plan First Deposit (1995-2011) has been used as the source for these.

Nature Conservation Policy

Policy 70 of the Local Plan restricts development within SPAs, SACs and SSSIs. Development is not permitted within these sites if it would harm the value and reason for the designation, unless (a) there is no reasonable alternative solution and the development is necessary for overriding public interest or, (b) conditions can be used to prevent damaging impacts. Policy 71 protects habitats and species which are worthy of retention.

Coastal Policy

Policy 90 is the only coastal policy in the Local Plan and states that development resulting in the loss of inter or sub tidal land will not normally be permitted. The only exceptions will be where there is no unacceptable impact on the marine/coastal environment, if the development requires a coastal location or if it is demonstrably in the greater public interest. There is no defined coastal zone within the plan.

Areas of Development

Plymouth City Council encompasses the majority of the urban areas around the Sound and estuaries and some of the most heavily modified foreshore areas. Development in the city is therefore likely to focus on the re-use of existing land, due to the relative lack of undeveloped areas. The dwelling provision estimates for 2006-21 are provided below:

- Northern Corridor – estimated potential for 3500 dwellings
- Waterfront Regeneration Areas – estimated potential for 4000 dwellings
- Eastern Corridor – estimated potential for 2500 dwellings
- 25ha of mineral extraction works in the eastern corridor

West Devon Borough Council

The Local Plan was adopted in March 2005, however the Local Plan is gradually being replaced by the LDF. The policies below are taken from the existing Core Strategy that is due to be submitted in October 2006. It should be noted that considerable changes are possible between now and the production of the LDF.

Nature Conservation Policy

WDBC has a number of policies within the Core Strategy aimed at protecting nature conservation interests within the district. Policy NE1 protects European and Ramsar sites whilst policy NE2 restricts development within SSSIs. Policy NE3 restricts development within LNRs, County Wildlife Sites and County Geological Sites. There is also a policy (NE4) which is aimed at protecting general biodiversity and earth science and promotes opportunities for enhancement and management. Statutorily protected species are also safeguarded under policy NE6.

Coastal Policy

There are no defined coastal policies within the Local Plan.

Areas of Development

West Devon is located at the northern end of the estuary, where the estuary banks are typically steep sided and relatively undeveloped. The district is also predominantly rural and with a prevalence of agricultural land. The district does not therefore contain any key developments that are of significance to the Sound and estuaries, although the development of footpaths and cycleways along the banks of the estuary is a possibility. The impacts of agricultural practice may have an effect on the water quality and ecological values of the area, but this is outside the scope of planning control. Effects on water quality from run-off of historic mining and spoil heaps may also influence the Sound and estuaries.

Caradon County Council

Current planning policies are set out in the Caradon Adopted Local Plan, which was published in December 1999. However, the latest proposals are set out in the Re-Deposit version of the Local Plan First Alteration, which was published in May 2005. This will not become formal planning policy until after the Local Plan Public Inquiry which is scheduled to take place 31st October 2006. Work has not commenced on a LDF at present.

Nature Conservation Policy

Caradon Local Plan (1999) contains a series of policies designed at furthering nature conservation. Policies CL12 and CL13 restrict development within SSSIs, NNRs, SPAs, SACs, Ramsar sites, RIGS and LNRs. In addition, the local plan has designated a number of areas as Areas of Great Scientific Value (AGSV) and development is restricted within these. These include St John's Lake, the Lower Tamer and the Lynher Valley and Estuary. Species are also protected under policy CL16 which restricts permissions for developments that would affect species protected by law.

There is also a specific policy (CL15) which is aimed at promoting nature conservation on the coast. This policy prohibits development that would cause physical damage, disturbance or pollution to the coast. Where essential coastal development is required its siting should be such to minimise ecological damage.

Coastal Policy

Caradon has a specific policy (Policy CL10) designed at limiting development within the coastal zone. This policy prohibits development within the coastal zone unless it is required for a number of purposes, such as providing public access to the coast for recreation.

Areas of Development

Caradon is the sole authority around the Sound and estuaries which falls within Cornwall. The key area for development identified within the Local Plan relates to the residential development at Saltash. This is in accordance with RSS and Structure Plan policy which identifies the provision of housing land at Torpoint and Saltash to support the growth of Plymouth. Additionally the possible extension at the Torpoint Marina was

identified in the workshops as was the provision of increased tourism infrastructure at Calstock.

- Torpoint – possible marina development
- Saltash – 1000 residential houses, development upriver or bridges, extension of park
- Calstock– infrastructure to support increased tourist numbers

South Hams District Council

South Hams District Council are in the process of producing their LDF. The Core Strategy has been produced which sets the planning strategy and vision for the district. However, for the purposes of this analysis, the South Hams Local Plan Review (2002) has been used as the source of nature conservation and coastal policies as this is the most recent document which contains detailed policies for the district.

Nature Conservation Policy

Policy ENV5 specifies that developments within European nature conservation sites must comply with the procedures set out in the Habitats Regulations 1994. Policy ENV6 restricts the granting of permissions for development which may affect SSSIs, whilst policy ENV7 protects County Wildlife Sites, LNRs and County Geological Sites. Policy ENV8 safeguards species which are statutorily protected.

Coastal Policy

The Local Plan has designated an area of the coast as a Coastal Preservation Area. Policy ENV4 specifies that development will only be permitted within Heritage Coasts where it would not adversely affect the ecological or geological interest of the coast.

Areas of Development

The South Hams area, which skirts the eastern edge of Plymouth has been identified within the RSS as an area to support the sustainable development of the Plymouth Urban Area. Within the district the largest singular growth point at Sherford is identified, which, as previously mentioned is set to provide up to 5500 dwellings by 2016. South Hams also contributes to a relatively large percentage of the overall levels of employment land provision.

- Sherford – 5500 homes by 2016 with possibility of more by 2026
- Newnham – residential
- Lantage – 40ha of employment land and the provision of new power station

4.5 Summary of regional and county guidance

The RSS and Structure Plans provide a consistent picture of anticipated levels of development around the Sound and estuaries. As a summary, the expected levels of development around the Sound and estuaries are presented in Table 4.4.

Table 4.4 Area wide housing and employment provision to 2016

Area	Dwellings	Annual Average	Employment (ha)
Plymouth Area	14,000 to 16,000	1,450 to 1,600	150-200

Additionally key areas of development are:

- The new community at Sherford;
- The employment allocation at Langage; and
- The provision of 1000 dwellings at Torpoint and Saltash.

The actual form of the development will need to be absorbed in the estuary area in terms of overall levels. However, as the supporting RSS and Structure Plan policy stipulates wherever possible this should be provided on previously developed land. These targets will also be met via a combination of large scale developments (such as the Sherford new community) and numerous small scale developments.

5 ANALYSIS OF KEY DEVELOPMENT ISSUES

Having identified the nature conservation values of the estuary in **Section 3** and defined the scale of development around the Sound and estuaries in **Section 4**, the interface between nature conservation and development was then fully explored. In order to provide a transparent and evidence-based approach to identifying how growth around the estuary may impact nature conservation values, a matrix has been provided to clearly show the likely relationships between the development and the environment (see **Table 5.1**) below.

The impacts of development for known proposals (i.e. specified land allocations) and for incremental development, and cumulative impacts have been considered. The diagram below illustrates the relationship between the general development and the larger specified developments. The main specific developments are:

- The new community at Sherford;
- The employment allocation at Language; and
- The provision of 1000 dwellings at Torpoint and Saltash.

In addition, general development will take place which represents all development which is not clearly allocated on a site specific base within land use plans or policy, but is necessary to meet the overall targets for development specified in **Section 4**. This general development typically comprises small scale, piecemeal type proposals, which clearly need to be considered in terms of their cumulative impacts in addition to other general development and specific schemes. In simple terms:

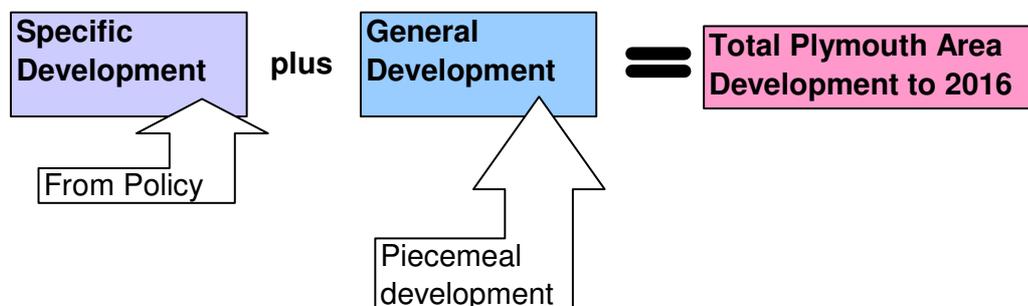


Table 5.1 summarises the impacts on the sensitivities of nature conservation values and relates this to the anticipated impacts of development. Possible measures to minimise these impacts are also specified.

The predicted levels of development have been analysed to determine how they may influence the conservation status of the Sound and estuaries. The larger development schemes, such as Sherford, Language, Plymstock etc. tend to be located inland away from the foreshore or the estuary viewshed. This limits the direct impacts of these developments on the estuary such as direct disturbance, loss of foreshore habitat and the wider impacts of the urbanisation of the foreshore. Indeed, the anticipated patterns of development, inland from the estuary are probably a result of the desire within policy to protect the natural resources of the area (of which the estuary is a prime resource)

and the actual physical limitations to development. For example, the steep sided areas of the estuary system in the north probably physically restrict development. The protection of the nature conservation values of the estuary is therefore already simplified, since the principle of focussing development away from the foreshore (unless a foreshore location is essential) has already been applied.

However, it should be noted that although the large specified developments are situated away from the estuary, they still have the potential to affect the estuaries indirectly. For example, the increase in residential development can place additional pressure on sewage treatment plants and potentially increase the input of nutrients, hydrocarbons and metals into the estuary.

In addition, the smaller scale general development, which is not included within the major land allocations, has the potential to damage nature conservation interests (particularly through cumulative effects), if they are situated adjacent to or on the foreshore. These smaller scale developments can sometimes involve the loss of small areas of foreshore and construction of jetties. This can cause direct loss of coastal habitat and species within the footprint of the development. Waterfront developments may also increase the levels of disturbance to birds if located near bird feeding or roosting areas. If dredging is required, this can also have potential effects on sediment and water quality as well as affecting the communities within the footprint of the dredge. Although on their own the impacts of these developments may not be significant, if many occur the cumulative effects can potentially be more serious.

A clear example of this has been well studied within the Sound and estuaries. In 1999, 'An Audit of Coastal Change in the Tamar Estuaries' (TECF, 1999) was carried out which determined the levels of historic land claim within the estuaries through analysis of historic maps. The study analysed the levels of land claim for industrial, agricultural, housing and other purposes since pre 1750. The study found that between 1750 and 1999, approximately 650ha of intertidal land was reclaimed. **Figure 4** illustrates the area of this loss. The majority of this land claim occurred between 1750 and 1849. Since the 1970's the rate of land claim has declined. Between 1980 and 1989 approximately 16 hectares was lost and between 1990 and 1999 only 0.27 hectares was lost.

In light of the above, estuary wide guidance is required to ensure that due regard is given to estuary nature conservation in making planning decisions and developing forward planning policy. As a result of the analysis, it has been determined that the guidance should be focussed on the following principles to further conservation of the estuaries:

- Promoting the development of land away from the foreshore and only allowing development on the foreshore where there is an absolute need for a foreshore location
- Ensuring that coastal developments are carried out in such a way to minimise environmental effects such as considering the timing of construction, storage of construction materials, minimise loss of intertidal/subtidal habitat and effects on coastal processes.
- Minimising the indirect effects of major land allocations by ensuring that adequate waste water treatment facilities are in place and the use of sustainable urban drainage schemes is encouraged

- Encourage creation of habitat enhancement in accordance with the provisions of PPS 9.

Guidance based on this analysis is offered in **Section 6**.

A previous study looking into the opportunities for enhancing biodiversity within the South West identified a number of locations within the study area suitable for potential habitat enhancement (Royal Haskoning, 2005). The opportunities for managed realignment and habitat restoration are limited within the Tamar Estuaries region due to the topography of the area. A summary of the identified sites is given below:

- Wembury Mill Meadows (Yealm Estuary) – Potential for creation of freshwater grazing marsh
- Crabtree, near Marsh Mills on the River Plym – Possibility of managed realignment where the flood banks are falling into disrepair.
- Millbrook - Potential to enhance existing lagoonal habitat into a more saline lagoon, or mudflats.
- Tamar – Various opportunities. Tamar management is concentrating on re-establishing and maintaining the estuary in its current state without losing any more areas to agriculture (i.e. reclamation was an issue at the time of the study).
- South Hooe Farm, Tamar – Potential for managed realignment over an area of around 18ha.
- Cotehele to Chapel Farm, River Tamar – At the time of the study, the National Trust were in the process of progressing managed realignment at this site.

Insert figure 4 (A4)

Insert figure 4 (A4)

Table 5.1 Matrix of development types, potential associated ecological impacts and suggested impact reduction measures

Type of development	Potential impacts on ecology of the estuary	Suggested measures to reduce impacts
<p>Waterfront development, coastal defence schemes and other schemes which involve construction of structures adjacent to the shoreline or below mean high water springs</p>	<ul style="list-style-type: none"> • Temporary disturbance to birds during construction if the development is situated close to important bird feeding/breeding or roosting areas • Risk of pollution incidents during construction • Damage to foreshore habitats during construction if construction plant need to access the shore • Loss of intertidal or subtidal habitat within footprint of the development if it involves land claim • Loss of fish nursery areas if the development involves land claim or disturbance to the foreshore • Loss of bird feeding or roosting habitat if the development involves land claim • Potential changes to morphology of the estuary if the scheme involves land claim or construction of structures below mean high water springs • Increase in levels of bird disturbance if the development is situated close to bird feeding areas and will encourage increased numbers of people to use the land/sea interface • Potential impact on bat roosts due to modification of waterfront properties and/or loss of tree roots • Potential impact on otters • Potential impact on lichen communities on river side trees, exposed substrate and mining heritage buildings in the Upper Tamar 	<ul style="list-style-type: none"> • If the development is situated near bird feeding areas, undertake construction outside bird over-wintering period • During construction follow relevant Environment Agency Pollution Prevention Guidelines • If the development involves land-take, create compensatory habitat elsewhere in the estuary, for example by managed realignment. • Minimise working area during construction and only allow construction plant onto the shore if strictly necessary • Design structures to minimise impacts on coastal processes, for example construct jetties on open piled structures rather than solid infill. • Adopt more natural coastal protection measures where possible such as beach nourishment. • Use materials for construction with complex surfaces with crevices or indentations to encourage colonisation by marine flora and fauna. • Use sustainable urban drainage schemes (SUDS) to minimise run-off and associated impacts. • Ensure planning applications are screened for potential impact to bat roosts. Developments should be informed by a Bat Roost Survey if necessary. • Ensure that bridges and culverts are designed to accommodate the safe passage of otters. • Developments with potential to impact on river side trees, exposed substrate and mining heritage buildings on the Upper Tamar should be informed by a Lichen Survey.

Type of development	Potential impacts on ecology of the estuary	Suggested measures to reduce impacts
Marinas / jetties	<ul style="list-style-type: none"> • Temporary disturbance to birds during construction, if the development is situated close to important bird feeding areas. • Loss of seabed habitat within footprint of slipways, jetties or other structures • Risk of pollution incidents during construction • Risk of water quality impacts during operation from input of antifouling or boat-cleaning chemicals etc • Potential disturbance to sediments during construction and subsequent redistribution of contaminated sediments within the estuary • Disturbance to fish passage during piling or blasting works. • Increase in general levels of bird disturbance within the estuary from increase in levels of boating • Potential changes to morphology of the estuary through interruption of coastal processes 	<ul style="list-style-type: none"> • If development is near bird feeding areas, undertake construction outside bird over-wintering period • During construction follow relevant Environment Agency Pollution Prevention Guidelines • If the development involves land-take, create compensatory habitat elsewhere in the estuary, for example by managed realignment. • Locate development away from important bird feeding areas. • Encourage best practise by the provision of waste receptor facilities etc. • Design new structures so as to minimise effects on coastal processes e.g. open piling rather than solid infill • Undertake works which could potentially affect fish migration outside Salmon and Allis shad migration season (March to October).
Dredging	<ul style="list-style-type: none"> • Damage to seabed habitat and species within footprint of the dredge • Potential change in type of seabed habitat if the dredge exposes a different type of substratum. • Potential temporary disturbance to birds during the dredge due to presence of dredging plant. • Redistribution of contaminated sediments within the estuary • Increases in levels of suspended sediment during the dredge, with subsequent effects on fisheries • Increases in sediment deposition during the dredge with subsequent impacts on fisheries, shellfisheries and seabed habitats • Changes to estuary hydrology through alteration of coastal processes 	<ul style="list-style-type: none"> • Undertake dredging works outside salmon migratory season (in consultation with the Environment Agency) • Choose appropriate dredging plant to minimise levels of suspended sediment. • If the dredge is likely to cause loss of intertidal habitat (either directly or indirectly through alterations to the tidal or wave regime), create compensatory habitat, such as through managed realignment • Consider beneficial use of dredged material such as water column recharge to minimise loss of material from the estuarine system and minimise effects of disposal. It should be noted that there may be conflicts between water column recharge schemes and the need to reduce

Type of development	Potential impacts on ecology of the estuary	Suggested measures to reduce impacts
	<ul style="list-style-type: none"> • Impacts on hydrodynamics and sedimentology of the estuary complex • Impacts of dredged arisings at disposal site 	<p>mobilisation of contaminated and suspended sediments.</p>
Footpaths / cycleways adjacent to the estuary	<ul style="list-style-type: none"> • Temporary disturbance to birds during construction, if the development is situated close to important bird areas (such as feeding areas or roost sites). • Increase in levels of disturbance to birds during use of the footpath and cycleway if the development is situated close to important bird areas (such as feeding areas or roost sites). 	<ul style="list-style-type: none"> • If development is near bird feeding areas, undertake construction outside bird over-wintering period • Consider constructing screening in sensitive areas to minimise disturbance to bird feeding or roosting area

6 PLANNING GUIDANCE RECOMMENDATIONS

The following section contains the key recommendations for planning policy within the Sound and estuaries. The guidance essentially comprises two elements. The first is recommendations for forward planning policy to be adopted by local authorities. The second is essentially a set of guidance and information aimed at development control officers and developers.

6.1 Recommendations for forward planning policy

The guidance is provided below in three key areas:

- Checklist of estuary conservation issues to be covered in LDF policy;
- The use of Sustainability Appraisals in estuary conservation; and
- Provision of indicators for the monitoring of land-use plan implementation.

This initial guidance suite is intended to ensure that across the estuary, management and policy provision from the county councils and all local authorities is consistent and has an objective of explicitly protecting the nature conservation interests of the estuaries. In the course of the policy review (see Appendix 2), policies aimed at environmental protection were found in all documents to differing degrees. However, there was an overall lack of specific coastal/estuarine management policy or measures to directly address the values of the estuary. In order for the estuary to maintain or enhance its nature conservation values as the area grows however, there is a need for specific policy which is more focussed than the general environmental policy found in existing documents.

6.1.1 Checklist of estuary conservation issues

Presented in Box 1 is a checklist of coastal conservation issues which should be covered in a LDF Core Strategy or other DPD policy. It is hoped that this checklist will be used by local authorities to help ensure that policies promote sustainable use of the estuaries and protection of estuary biodiversity. The checklist accords with the guidance offered in PPS 9 and also PPG 20 Coastal Planning, but is more focussed on actual coastal management and current best practice rather than risk reduction or tourism development.

Box 1: Checklist of estuary conservation issues which should be covered in a LDF Core Strategy of other DPD policy

- Identify the role of Plymouth Sound and Estuaries SAC, Tamar Estuaries SPA, the coastal SSSIs and the other non-statutory designations such as Warleigh Point Nature Reserve. Recognise the ecological value of the nature conservation interests of the Plymouth Sound and estuaries and the levels of connectivity between the marine, intertidal and terrestrial habitats.
- Provide a strategic framework for the protection, restoration or creation of priority coastal BAP habitats, such as mudflats, and the protection and enhancement of the population and habitats of priority BAP species.
- Promote development away from foreshore areas and put in place a framework for restricting development on the foreshore to those developments which can clearly demonstrate the absolute need for a foreshore location.
- Provide a framework for considering effects on biodiversity of the estuaries when reaching planning decisions. In particular, consider effects of recreation on level of bird disturbance. For example, an assessment of impacts could be required to support all applications which have the potential to affect the intertidal or subtidal. Planning applications could be supported by an assessment of the impacts of anticipated increased levels of disturbance on local nature conservation interests.
- Promote sustainable development by ensuring that any foreshore development schemes are accompanied by a construction plan, which clearly demonstrates how levels of construction phase noise and disturbance have been minimised. Such plans should, wherever possible have regard to the seasonal or episodic requirements of estuary wildlife and demonstrate how construction activity has been planned to reduce any impacts on such wildlife.
- Ensure that adequate waste water treatment plants are provided for new housing allocations so as to ensure that the overall levels of waste water sourced nutrients, contaminants and pathogens within the estuary do not increase.
- Promote the use of sustainable urban drainage systems for all new schemes. Ensure that run-off from sites during construction is also reduced to minimum levels.
- Promote the use of ongoing site management plans for all major developments to promote the use of sustainable water management on the site.
- Encourage coastal habitat creation and enhancement.
- Manage land use in step with naturally coastal functioning processes.
- Protect the estuaries from pollution by discouraging the storage or use of hazardous chemical away from any locations subject to flooding.
- Monitor on a yearly basis the levels of development within the district in order to allow assessment of cumulative impacts on the nature conservation values of the estuary.

Case study: Poole Harbour Commissioners – Note on Information for Appropriate Assessment

Poole Harbour Commissioners has promoted best practise in estuary management by producing a guidance note on the information that must be provided by developers for developments which might affect the Poole Harbour SPA. The note is available on the harbour commissioners website. The note specifies the type of supporting information that must be submitted by developers in order to allow an assessment under the Conservation (Natural Habitats &c) Regulations 1994. The note specifies the information for a decision of likely significant effect and also the information required to support appropriate assessments.

The harbour steering group have requested that applications are supported by a description of the scheme, maps and photographs of the site (including viewlines) and a description of maintenance requirements and any environmental benefits. Where appropriate assessment is required, further information must be provided including an assessment of current disturbance levels, and assessment of the value of the site to birds and as intertidal habitat.

The production of this note has increased the level of transparency for developers about the information that must be submitted and ensures consistency across of the SPA. It is considered that this represents an example of best practise in the provision of planning guidance notes.

6.1.2 The role of sustainability appraisal in protecting the estuary

As plans (such as LDFs) are reviewed or replaced, a Sustainability Appraisal (SA) is now required under government guidance and to meet with the objectives of the Strategic Environmental Assessment Regulations. The use of SA provides a critical opportunity to ensure that policy is produced via an assessment of its overall sustainability in regard to impacts on the Sound and estuaries.

Given the importance of the Sound and estuaries and the potential for sub-regional growth to impact the estuary it is recommended that in producing their Sustainability Frameworks (the core mechanism within an SA), that the protection of the estuary's nature conservation is seen as a critical sustainability issue. The following matters are considered to be essential to consider in any SA:

- The impacts and the cumulative impacts of the policy suite on estuary nature conservation values;
- The need to ensure that current policy provision has regard to the objectives contained within the Water Framework Directive (WFD);
- The need to ensure that policy provision has regard to the measures contained within River Basin Management Plans (produced under the WFD) expected in 2009;
- Has full regard to the need for an appropriate assessment under the Habitats Directive in regard to the impact of the policy suite on the features of the estuaries European Sites. Note – the Office of Deputy Prime Minister are currently considering how, appropriate assessment should be provided for land use plans, however, the use of the SA is a likely mechanism for this.

A draft indicative Sustainability Framework is provided in **Table 6.1**, which is indicative of the types of issues for consideration aimed at protecting threats to estuary nature conservation interests.

Table 6.1 Sustainability Framework

Sustainability Framework	
Ecological Objectives	RSS or LDF Policies for evaluation against sustainability objectives
Prevent deterioration of estuary ecosystems	
Comply with water related standards and objectives for protected areas (established under EU legislation). For example SACs and SPAs under the Habitat Regulations or sites under the Shellfish Waters Directive	
Water Quality Objectives	
Restoration of estuary water quality to 'good status'	
Reduce pollution from priority substances and cease discharges from priority hazardous discharges	
Prevent or limit input of pollutants into the estuary	
Water Resource Management Objectives	
Promotion of water efficient development	

6.1.3 Monitoring of the implementation of land-use plans

The effectiveness of land-use plans are reviewed on an annual basis and indicators are set by local authorities for the monitoring of their implementation. In order for the monitoring of plans to have a specific focus on estuary nature conservation values, there is a need to ensure that a suite of appropriate monitoring criteria is established across the estuary, which enables a handle to be kept on the manner in which the estuary is responding to development. Such provisions can be used as an evaluative tool in the review of LDF policy, however there is a need to ensure that an estuary wide review and assessment of monitoring is provided. In this respect TECF may provide a critical role, in ensuring that policy is reviewed on a consistent basis, and where appropriate amended to prevent the incremental and/or cumulative degradation of nature conservation interests.

A draft suite of monitoring indicators is provided below, however, the actual suite, would need to be developed and refined on an estuary wide basis.

Table 6.2 Potential management objectives and monitoring indicators

Objectives	Indicators
Ecological Objectives	
Ensure all major developments have construction and operation method statements detailing good environmental practice	100% of major developments produced construction and operation method statements.
All waterfront developments be supported by an assessment of environmental impacts both locally and on the wider estuary i.e. cumulative effects	100% waterfront developments be supported by cumulative and local environmental assessments
Prevent loss of natural foreshore in the estuary system and enforce provision of compensatory habitat in the event of essential development	No further net loss of foreshore within the estuary system
Water Quality Objectives	
Comply with 'Good Ecological Status' as described in the Water Framework Directive	Compliance with 'Good Ecological Status' as described in the Water Framework Directive
Water Resource Management	
Promotion of water efficient development	Number of developments using SUDS

6.2 Guidance for development control

6.2.1 Consultation

During the workshop, it was identified that there is often a lack of clarity as to which organisations should be consulted on development applications within the coastal zone. In order to address this, presented in **Appendix 3** is a list of organisations that should be consulted. Presented in this table are contact details for each organisation as well as a short description of their role and the type of development for which they should be consulted. It should be noted that not every organisation requires consulting for every type of development. It is suggested that these organisations are contacted by developers prior to submission of an application. In addition, they should be consulted during the preparation of any environmental assessments such as EIAs.

Case Study: Poole Harbour Channel Deepening Environmental Impact Assessment

Poole Harbour Commissioners recently carried out an Environmental Impact Assessment (EIA) for proposed deepening of the approach channel to the port. As part of the assessment detailed consultation with stakeholders was carried out from the outset. A series of "topic" groups of relevant stakeholders were formed such as for archaeology and nature conservation. Meetings of each topic group were held on a regular basis to discuss the scope of the EIA, predicted impacts of the scheme, mitigation proposals, provisional findings of the EIA and monitoring. This process encouraged open dialogue between the EIA team, the scheme proponent and stakeholders. It helped ensure that stakeholders concerns were addressed at an early stage in the EIA and that mitigation proposals could be developed where necessary. Public open meetings were also held to encourage wide public engagement in the scheme. In addition, all information was made available via a website.

6.3 Cumulative and in-combination effects

6.3.1 Introduction

Cumulative impacts are defined as (Hyder Consulting, 1999):

“Impacts that result from incremental changes caused by other past, present or reasonably foreseeable future actions together with the project”.

In the UK, when an Environmental Impact Assessment is carried out, there is a requirement to consider the cumulative impacts of development. In addition, a requirement exists to consider ‘in combination’ impacts under ‘Article 6(3) of the Habitats Directive and Regulations 48(1) of the Conservation (Natural Habitats &c.) Regulations 1994. This states that:

“A competent authority, before deciding to undertake, or give any consent, permission or other authorisation for a plan or project which:

- a) is likely to have a significant effect on a European site in Great Britain (either alone or in combination with other plans or projects), and*
- b) is not directly connected with or necessary to the management of the site;*

shall make an appropriate assessment of the implications for the site in view of that site’s conservation objectives”.

In-combination assessment is required because although, in isolation, the impacts associated with a particular project may not result in an adverse effect on integrity of a European Site, the impacts in-combination with those of other projects may have an adverse effect. Therefore, when carrying out such an assessment it is necessary to consider the impacts from past, present and reasonably foreseeable future plans or projects on a particular environmental resource. If, for example, two projects are predicted to have no adverse effect on the integrity of a European site, it is not sufficient to conclude that in-combination there will be no adverse effect on integrity. A combination of the various impacts may result in the two projects, in-combination, having an adverse effect on integrity.

Case study: Felixstowe South Reconfiguration: Hutchison Ports UK Ltd

Hutchison Ports (UK) Ltd have put forward a number of planning applications for port developments in the area of Felixstowe, Suffolk. The proposals lie close to the Stour and Orwell Special Protection Area. In accordance with the Conservation (Natural Habitats) Regulations 1994, there was a requirement to undertake an in-combination assessment of the various proposals. As part of the most recent planning application, an in-combination assessment was undertaken by Royal Haskoning of the effects of Bathside Bay container port proposals in-combination with Felixstowe South Reconfiguration proposals and other past port development projects. The in-combination assessment involved considering the additive effects of the various schemes and subsequent effects on the SPA. A separate in-combination assessment report was produced which formed an appendix to the Environmental Statement.

6.3.2 Methodology for cumulative impact assessment

Methodologies for assessing cumulative effects are in general still under development. Although there has been much discussion in the literature, there are few established practical methods for undertaking cumulative assessment. However, guidance on undertaking in-combination assessments in relation to effects on European sites is provided in Habitats Regulations Guidance Note 4 (English Nature, 2001). It is recommended that the methods within this guidance are followed for all developments which have the potential to have cumulative effects on the Sound and estuaries.

Cumulative impacts can be additive or interactive. Additive impacts occur where one unit of change to the environment may be added to (or subtracted from) another unit. Interactive impacts are such that the net accumulation of the units of change to the environment is more or less than the sum of all the units of change. Cumulative impacts can also have an effect in terms of the overall temporal impact, scale of impact and/or spatial impact.

The key aspects for consideration, therefore, when conducting a cumulative impact assessment are:

- The temporal and geographic boundaries of the effects of activities;
- The interactions between the activities and the overall ecosystems;
- The environmental effects of the project, and past and future projects and activities; and,
- The thresholds of sensitivity of the existing environment.

Any developments which are likely to have a significant effect on the SPA or SAC will require an in-combination assessment under the Habitats Regulations. With regard to coastal development within Plymouth Sound and estuaries which is not subject to appropriate assessment, it is recommended that planning authorities nevertheless consider the cumulative effects of development, when considering applications. This is particularly important for developments which involve loss of intertidal habitat.

It is recommended that the following procedures are followed to undertake the cumulative or in-combination assessment:

- At an early stage in a scheme's development, the scheme's proponent should discuss the need for cumulative impact assessment through consultation with the consenting authority.
- Determine the geographical scope of the in-combination assessment through consultation with English Nature and the consenting authority. This should be done by first defining the boundaries of project related effects. The geographical scope should include all schemes which have the potential to interact with the proposed development.
- Define the temporal scope of the in-combination assessment. There is no established cut-off date for considering the effects of past projects. In theory, this can extend back as far as records begun. However, when defining the scope, it is important to bear in mind the objectives of the cumulative assessment and set the time frame accordingly.
- Gather details of other projects or plans in the area. It is recommended that this is done by contact with the local authority which should hold details of schemes

recently consented or applied for in the area. Consultation with English Nature can also be useful for this purpose. These should include:

- a) Approved but as yet uncompleted plans or projects;
 - b) Permitted ongoing activities such as discharge consents or abstraction licenses, and
 - c) Plans or projects for which an application has been made and which are currently under consideration but not yet approved by competent authorities.
- Identify impacts of these other projects on the environment then identify pathways by which the different projects may have cumulative effects. Through linked pathways, assess possible interactions among environmental effects of the projects and determine the likelihood and significance of cumulative effects of the projects.
 - Produce a statement of the cumulative effects of the proposed development in combination with others in the area. For example, for developments that result in a loss of intertidal habitat, the total area that will be lost by all relevant plans or projects should be stated.

In the Plymouth area, one of the current areas of concern among the coastal management community is the cumulative effect of many small intertidal developments through incremental land claim. This issue is well documented in 'An Audit of Coastal Change in the Tamar Estuaries' (TECF, 1999) (see **Section 5**). It is recommended that this study is used during cumulative impact assessments to consider the effects of loss of intertidal.

6.4 Consents for development within the coastal zone

At the workshop, it was identified that there is often a lack of clarity on what consents are required for development in the coastal zone. There are a number of consents and procedures relating to coastal development and their relevance is dependent upon the location and sphere of influence of the development.

Above the mean low water mark, the Town and Country Planning Act is the main vehicle for regulating development. This is facilitated through the establishment of planning policies by local authorities and the requirement for planning permission to be obtained by prospective developers. Adopted policies have statutory weight and provide a legal framework within which decisions on whether to permit or refuse development applications are made.

It should be noted that certain types of development do not require planning permission (through the Town and Country Planning General Permitted Development Order, 1995) and Ministry of Defence developments are not subject to local planning policy. However, if the development is likely to have a significant effect on the environment, it will require planning permission, accompanied by an Environmental Impact Assessment (EIA).

Below the high water mark, a series of different controls also operate. The main types that usually affect coastal development are detailed in Table 6.3. The majority of these consents are administered on behalf of Defra by the Marine Consents and Environment Unit (MCEU). It should be noted that the following list is not exhaustive and confirmation should be sought from the MCEU (and other consenting authorities) as to what consents are required for a particular development (see www.mceu.gov.uk for further information).

The mostly commonly required consents in the intertidal zone are Food and Environment Protection Act license and Coast Protection Act consent.

Case Study: Solent Forum Marine Consents Guide

In 2002, the Solent Forum recognised that there was often confusion about what consents and permissions are required when undertaking activities in the marine environment. In order to address this, a guide was produced and published on their website which provides a signposting service to show what consents and licences will need to be obtained when undertaking specific activities. The aim of the guide is to help clarify the type of consent needed, where to go to get it and give basic information on the application process.

Table 6.3 List of the main consents that can be required for coastal development

Name of consent or legislation	Details	Required for	Organisation that administers the consent
Coast Protection Act 1949, Section 34 Navigation Consent (CPA)	The purpose of the act is to ensure that development on the coast does not adversely affect the safety of navigation	Consent is required for the following <ul style="list-style-type: none"> • the construction, alteration or improvement of any works on, under or over any part of the seashore lying below the level of mean high water springs; • the deposit of any object or materials below the level of mean high water springs; • the removal of any object or materials from the seashore below the level of mean low water springs (e.g. dredging). 	MCEU on behalf of Defra
Food and Environment Protection Act 1985 (FEPA) Licenses	The purpose of the FEPA licensing is to ensure that development and works in the coastal zone do not damage the marine environment or human health, or interfere with legitimate uses of the sea.	Under this Act, a licence is required for the deposit of any articles or substances in the sea or under the seabed.	Licences are issued through the MCEU following consultation with various bodies e.g. English Nature, Environment Agency etc.
Town and Country Planning Act 1990	Regulates development above the low water mark	Any development above the low water mark i.e. on land. Planning permission required for any development normally covered through the Town and Country Planning General Permitted Development Order (1995) that may significantly effect the environment.	Local planning authority.
The Conservation (Natural Habitats &c) Regulations 1994 – “appropriate assessment”	These regulations control development within SACs and SPAs by restricting consent for developments which may affect the ecology of the sites. The first test to be applied is whether the planned project is likely to have significant impact on the	Any application for proposed works within or adjacent to the Plymouth Sound and estuaries SAC or the Tamar Estuaries Complex SPA	Usually the local authority or the MCEU, upon advice from English Nature.

Name of consent or legislation	Details	Required for	Organisation that administers the consent
	<p>SAC or SPA site. This decision is made by the consenting authority.</p> <p>Should it be concluded the work is likely to have significant impacts on the SPA or SAC, it will normally undertake an appropriate assessment of the works to assess whether the impacts will be adverse.</p> <p>The applicant is normally required to submit information to the consenting authority on the nature of the development and its predicted impacts. Unless the conclusion is there will be no adverse impact, the applicant will have to consider mitigation measures for these effects. If the consenting authority decides there is no alternative approach, and that there are reasons of overriding public interest for it to proceed, the project may only be consented after a suitable compensation package has been agreed.</p>		
Telecommunications Act 1984 (as amended by the Communications Act, 2003)	This Act covers the installation of telecommunications cables below the level of MHWS	Consent required for any proposal to install telecommunications cables at sea and in other tidal waters below the level of Mean High Water Springs (MHWS).	Consent is required from the Secretary of State for Environment, Food and Rural Affairs; administered by the MCEU
Government View Procedure (Crown Estate)	Regulates marine aggregate extraction. It is an extended consultative process which follows the principles of land based planning procedures. The procedure is currently non-statutory and will be replaced in due course by the statutory mechanism	Marine aggregate extraction from seabed owned by the Crown Estate	Administered by the Minerals and Waste Planning Division of the Office of the Deputy Prime Minister (ODPM)
Discharge Consent for the Environment Act, 1995	To regulate the discharge of sewage, trade and other effluents.	Required for all discharges into a water body.	Consents are issued by the Environment Agency under the

Name of consent or legislation	Details	Required for	Organisation that administers the consent
			Environment Act, 1995.
Harbour Revision Orders (HRO)	Authorise works within established harbours, where these lie outside the existing powers of the harbour authority. They are also the vehicle for amending the powers and areas of a Harbour Authority.	For works within established harbours that lie outside of the existing powers of the Harbour Authority.	HROs are made by the Secretary of State for Transport.
Harbour Work Licenses (Harbour Authorities)	Regulate works within harbours aiming to protect safety and navigation. Some harbour authorities have the power to regulate works within their areas through the issue of harbour works licences.	Works within some harbour authorities	Harbour Authorities
Land Drainage Consent	Under the Land Drainage Act 1991, prior written consent is required for any mill, dam, weir or similar obstruction for any culvert (or alteration to culvert) likely to affect the flow in an Ordinary Watercourse.	Required for any mill, dam, weir or similar obstruction for any culvert (or alteration to culvert) likely to affect the flow in an Ordinary Watercourse	Written consent is obtained from the Environment Agency.

7 CONCLUSIONS

This study has found that the majority of proposed major developments within the Plymouth area are situated away from the Sound and estuaries and as such have limited potential to directly affect the estuary. However, the estuary remains vulnerable to smaller scale general development, which is not included within the major land allocations and has the potential to damage nature conservation interests (particularly through cumulative effects).

In the course of the policy review, policies aimed at environmental protection were found in all documents to differing degrees. However, there was an overall lack of consistent specific coastal/estuarine management policy. In order for the estuary to maintain or enhance its nature conservation values as the area grows, there is a need for specific policy which is more focussed than the general environmental policy found in existing policy documents. Estuary wide guidance is therefore required to account for this growth to ensure that due regard is given to nature conservation.

Presented in the summary document is a checklist of estuary conservation issues to be considered when developing forward planning policy. It is recommended that each local authority uses this checklist during preparation of LDFs and other planning documents.

Sustainability appraisals and appropriate assessments of LDFs provide a means of ensuring land-use plans have due regard to the nature conservation interests of the Sound and estuaries. In particular, the need for appropriate assessments, which has recently been confirmed, will promote conservation of the Sound and estuaries.

This study also make the following recommendations:

- The majority of the key management issues affecting the ecology of the estuaries are outside the control of the planning regime. For example, the European Marine Site Management Scheme (English Nature, 2001) identified that anchoring at the mouth of the Yealm is a key issue but this cannot be controlled by the planning system. It is recommended that separate initiatives are carried out to investigate these issues and develop measures to minimise any impacts. Some actions are already specified in the European Marine Site Management Scheme.
- It is recommended that action is carried out to increase awareness of appropriate assessment procedures and the application of appropriate assessment to land-use plans. Such awareness can successfully be achieved by training workshops and also by publication of information on the TECF website. Publication of such information would increase the transparency of the planning regime for prospective developers and promote early dialogue between developers and nature conservation agencies.
- TECF is ideally placed to develop a role as an estuary-wide planning conduit. Through its members it could act as a central co-ordinator for the coordination of coastal planning issues. For example, its website could be used to provide information on the types of consents required for marine development. In particular, it could act as a focus point for the assessment of cumulative effects, by maintaining a register of proposed plans or projects within the study area.

- It is recommended that the Key Guidance document is provided to developers in order to increase their awareness of the types of impacts development can cause, consents required and the benefits of early consultation. This could be achieved by alternatively publication of information on the TECF website and dissemination of the document by local authority planning departments.
- It is recommended that there is increased publicity of the existing information and data (such as survey work) that has been carried out within the study area. A good body of information exists about the site but many local authorities and developers are likely to be unaware of this information. TECF could help raise awareness of this information by publication of reference lists or database on its website. Similar lists have been published by other coastal forums such as the Solent Forum.
- If small scale waterfront developments occur, it is possible that there will be increasing need to find compensation habitats if these developments result in loss of foreshore. TECF could potentially play a role in co-ordinating the development of compensation sites on a estuary wide basis by undertaking a strategic study to investigate habitat creation or enhancement opportunities. Some studies have already taken place to investigate potential sites and dissemination of the results of these studies could help encourage proactive management of habitats and habitat creation.
- The WFD requires that River Basin Management Plans (RBMP) are produced for each River Basin District (RBD) by 2009. These will be strategic management documents, developed via the River Basin Planning process, which will integrate the management of the water and land environment. It is recommended that emerging policy has regard to the likely provisions of the Water Framework Directive.
- Over the coming years, coastal planning is likely to be influenced by the Marine Bill and also the EU Marine Strategy if they are implemented. These have the potential to have wide-ranging changes for coastal planning for example, by the introduction of marine spatial planning and the streamlining of marine consents. If this new legislation is implemented it is likely that any supplementary planning documents concerning coastal planning would require revision. It is recommended therefore that TECF remain aware of the development of the Marine Bill and the Marine Strategy and disseminate such information as appropriate to its members.

8 BIBLIOGRAPHY

A wide range of reports are available regarding the Plymouth Sound & Estuaries area. Those employed in the production of this report and associated guidance are detailed below.

Bunker, F., Moore, J. & Perrins, J. (2001). Biotope Survey of the Intertidal of Plymouth Sound & Estuaries European Marine Site. Produced by MarineSeen for English Nature.

Camplin, M. (1996). Jennycliff and Batten Bay Intertidal Marine Wildlife Survey. Produced for Devon Wildlife Enterprises Ltd & Plymouth City Council. Exeter.

English Nature (2000). Plymouth Sound & Estuaries European marine site. English Nature's advice given under Regulation 33 (2) of the Conservation (Natural Habitats &c.) Regulations 1994.

Environment Agency & English Nature (1998). Plymouth Sound & Estuaries Nature Conservation Review. Tamar Estuaries Consultative Forum.

Langston, W.J., Chesman, B.S., Burt, G.R., Hawkins, S.J., Readman, J. & Worsfold, P. (2003) Characterisation of European Marine Sites: Plymouth Sound and estuaries (candidate) Special Area of Conservation, Special Protection Area. Carried out on behalf of the Environment Agency and English Nature. Plymouth Marine Science Partnership. Plymouth.

Plymouth Marine Applications Ltd (2004). A desk study to assess the impact of dredging activity on the Tamar Estuary. Plymouth.

Royal Haskoning (2005). Coastal Biodiversity Opportunities in the South West Region, for English Nature.

TECF (1999). An Audit of Coastal Change in the Tamar Estuaries. Tamar Estuaries Consultative Forum.

Tamar Estuaries Consultative Forum (1998). Plymouth Sound & Estuaries: Environmental Sensitivity Recording and Prioritisation. Environmental Consultancy Services Ltd, Stonehaven.

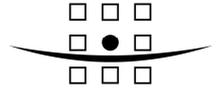
Tamar Estuaries Consultative Forum (TECF). Tamar Estuaries Management Plan 2001-2006

Tamar Estuaries Consultative Forum (TECF). The Plymouth Sound and estuaries European Marine Site Management Scheme 2001.

Yealm Estuary Management Plan Steering Group (1997) Yealm Estuary Management Plan. Produced with assistance of English Nature, South Hams District Council & River Yealm Harbour Authority.

=O=O=O=

A COMPANY OF



ROYAL HASKONING

Appendix 1 Workshop Minutes

Summary Minutes

To : Attendees
From : Mat Cork, Nicola White, Caroline James
Date : 16 March 2006
Copy :
Our reference : 060316CJ_9R8241workshopreport

Subject : Plymouth Sound & Estuaries Coastal Planning Workshop

Present:

Alistair Macpherson (Tamar Estuaries Consultative Forum (TECF))
Andy Roberts (Plymouth City Council)
Ben Dancer (West Devon Borough Council)
Caroline James (Royal Haskoning)
Commander Ian Hugo (Queens Harbour Master)
Dr Cathy Turtle (Cornwall County Council)
Howard Simpson (Environment Agency)
Jo Perry (West Devon Borough Council)
Judith Hawke (Cornwall County Council)
Kathryn Deeney (Environment Agency)
Laura Heape (English Nature)
Mat Cork (Royal Haskoning)
Nicola White (Royal Haskoning)
Robin Toogood (South Devon AONB)
Shaun Pritchard (Environment Agency)

The workshop formed part of the “Plymouth Sound and estuaries Coastal Planning Study” which is being carried out by Royal Haskoning on behalf of TECF. The aim of the workshop was to discuss the development pressures and threats that are being placed on the sound and estuaries and means of ensuring that the nature conservation interests are given due regard and planning policy and planning decisions.

The key outcomes of the workshop are summarised below:

1. Forthcoming development

Through the use of maps and post-it notes, a clear idea of forthcoming development within the Plymouth area was obtained. This included not only large scale developments (such as the Sherford) but also smaller developments such as at Weir Quay. Possible developments that were identified included:

- Millbay – several developments proposed including housing and facilities for cruise vessels
- Cattewater developments
- Work planned in South Dockyard (modernisation of the site)

- Weir Quay – jetties & dry boat storage
- Halton Quay expansions
- Calstock/Morwellham – infrastructure to support increased tourist numbers
- Pottery Quay – housing
- Plymouth speedway – near Marsh Mills
- Fort Bovisand – possible redevelopment
- Hoe Lake – possible development of housing
- Torpoint – possible marina development
- Saltash – 1000 residential houses, development upriver or bridges, extension of park
- Yealm estuary - possible path scheme
- Devonport – future development
- City centre – development
- Plymstock Quarry – residential and commercial development
- Hazeldene Quarry – residential
- Staddiscombe – residential
- Newnham – residential
- Paper factory – residential
- Derriford airport
- Sherford – 5500 homes by 2016 with possibility of more by 2026
- Langage – employment and power station
- World Heritage site proposals – increase in number of visitors to Tamar and Tavy

Other general pressures placed on the estuary include:

- Water quality issues associated with drainage from disused mines and run-off from spoil heaps
- Increased use of footpaths and cycleways around the estuaries which can cause bird disturbance
- Increased sewage / waste water treatment demands associated with increases in the number of housing
- Water quality issues associated with leachate from land-fill sites

It was noted that there is an increasing trend for small scale developments around the estuary which potentially result in a loss of foreshore. These include the construction of slipways, waterfront properties, coastal defences and pontoons. These can have an incremental effects on the status of the estuary.

2. Assessment of cumulative impacts

Cumulative assessment appears to be an important issue with regard to intertidal land claim. Proposals occur around the estuary which involve small scale land claim which whilst not significant on their own, may have significant impacts in-combination with other intertidal development. The difficulties associated with cumulative impact assessment were raised including communication issues across administrative boundaries. Recommendations for the methodology of carrying out cumulative assessment will be included in the guidance document.

3. Difficulties of protecting non-designated habitats

Whilst mechanisms are in place to prevent damaging development within designated sites, there are few mechanisms in place to protect habitats which are no designated. This was highlighted by several people as being a problem, although the majority of the study area is designated as Special Area of Conservation.

1. Responsibilities unclear

There is often a lack of clarity on which public body has responsibility for which aspect of the planning procedure and who is to act as the competent authority. This is exacerbated by overlap of authority in certain areas, resulting in uncertainty as to who should process the application. Procedures need to be put in place to overcome these issues, and improve general communication between overlapping authorities. Recommendations will be included within the guidance document.

2. Consultation focus unclear

There is often confusion as to which organisations should be contacted for consultation on coastal developments. The production of a list of consultees would be extremely beneficial to the overall process. Recommendations will be included within the guidance document.

3. Need for guidance on existing sources of data/reports

There is a wealth of information already available pertaining to nature conservation issues within the Plymouth Sound & Estuaries area. There is a need for awareness of the available data to be raised, and the production of guidance on these existing sources and reports. It would also be useful to reference these data sources to particular scenarios i.e. for help with scenario a, consult report b.

4. Impacts matrix

It was felt that it would be useful to have a matrix illustrating the type of environmental impacts associated with different coastal developments. It would provide a clear, simple, quick and easy way of obtaining a basic idea of what impacts could potentially arise from what development. This would also provide a list of potential issues to be considered, and links to examples of best practise. A matrix will be included within the guidance document.

5. Use of examples of best practise

The use of examples of best practise is an important tool in planning guidance. A range of examples were discussed, and using them allows people to know the ideal way of dealing with certain issues. It would also save the time normally required to search up historical cases in order to fully assess cumulative effects. Similarly there are examples of bad practise that are useful to learn from previous mistakes. The Haymarsh managed realignment proposals were highlighted as providing an example of the constraints of the planning regime.

6. Need for guidance focused on users

It was emphasised that it is important to define the intended users of the planning guidance that will be produced by the project. This is necessary to ensure the guidance is pitched at the right level for the right people. It is anticipated that the main users are planning officers of local authorities both to assist with development of forward planning policy but also with development control. The guidance is also intended for use by developers.

7. Other

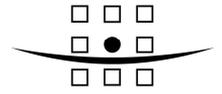
A number of other issues were discussed, the major one being problems associated with enforcing planning conditions placed on developers. There is also an issue with development on agricultural land as this is beyond the planner's jurisdiction.

11. Conclusions

The planning guidance should include:

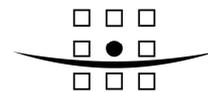
- ❖ Matrix of environmental impacts arising from coastal development
- ❖ Recommendations for increasing the clarity of responsibility for decision-making in the coastal environment, such as who is the competent authority
- ❖ Checklist of organisations that should be consulted on development applications
- ❖ Suggestions for incorporating environmental enhancements into the planning policy regime such as mudflat creation
- ❖ Recommendations for best practice on assessing the cumulative effects of development
- ❖ Recommendations for strengthening the protection of the estuaries and sound in forward planning policy.

A COMPANY OF



ROYAL HASKONING

A COMPANY OF



ROYAL HASKONING

Appendix 2

Policy analysis

Local Policy Provision

Policies which relate explicitly to an identified development are boxed.

Development policies

Plymouth City Council

City centre – development

- Plymouth City Council Local Development Framework, preferred options July 2005:

Policies - 4.15, 7.3, 9.2, 9.3, 9.4, 9.6, 10.3, 11.2,
Preferred Option 19, 12.6,
Preferred Option 21, 21.9, 22, 28.6, 24, 29.3

- Core Strategy

Policies 24.4, 24.5, 28.5, 29.3, 4.11, 4.15, 7.6, 9.3, 11.1, 11.2, 11.3, 11.8, 11.9

POLICY 4.15.

By 2016, Plymouth's City Centre will fulfill its role as a Regional Shopping and Entertainment Centre. The City Centre already supports a wide range of shops - and its retail role will be strengthened by the new development unfolding at Drake Circus. Nevertheless, in order to retain and better fulfil this role, new investment will be encouraged to provide 2,500 sq. m. net of retail space for convenience goods, and 87,850 sq. m. for comparison goods (including 30,000 sq. m. at Drake Circus), by 2016.

Plymstock Quarry – residential and commercial development

- Plymouth City Council Local Development Framework, preferred options July 2005:

Preferred Option 19. Shopping Centres

- N Plymstock Area Action Plan

Policies 7.5, 9.28, 9.50, 9.63, 9.64, 9.1

POLICY 9.1.

The City Council's preferred option is to see Plymstock Quarry development as a new neighbourhood of Plymouth, based upon principles of sustainable development and an exemplar design-led approach. This should include the following elements.

Millbay – several developments proposed including housing and facilities for cruise vessels

- Plymouth City Council Local Development Framework, preferred options July 2005:

Policies 21.9, 23.2, 23.3
 Preferred Option 19. Shopping Centres
 Preferred Option 21
 Preferred Option 12.5: Regeneration Areas

- Milbay & Stonehouse Area Action Plan

Policies 8.5, 8.11, 8.18, 9.1, 9.23, 9.29, 9.35, 9.39, 9.43, 9.62, 9.66, 9.74, 9.83

POLICY 8.5.

The Council has identified the following existing sub-neighbourhoods, which would be strengthened through the detailed proposals:

1. *Wyndham Hill, centred on Wyndham Street;*
2. *Station west, centred on North Road West;*
3. *Union Street, including areas bound by Clarence Place to the north and Millbay Road to the south;*
4. *Millbay Docks and the area between the docks and the City Centre;*
5. *Stonehouse Peninsula.*

Preferred option 1. Boulevard link to the City Centre from Millbay.

9.1. To create a new Boulevard, which involves the redesign of the Western Approach junction in order to make as direct connection as possible between the City Centre and Millbay. This option is shown below as Option D.

Preferred Option 3. New Primary School.

9.23. To develop a new primary school on the Boulevard. The development should follow the principles of an extended school in an urban area, which will contribute, to the creation of a community hub.

Preferred Option 4. Marine Sciences and Technology and marine related employment.

9.29. To allocate land adjacent at the port for Marine Sciences and Technology as well as other Marine related employment. This presents an opportunity to:

1. *Create new high-income jobs.*
2. *Add to the image and reputation of Plymouth as a marine centre of excellence.*
3. *Provide a high quality building at this Gateway location.*

Preferred Option 5. Arena.

9.35. To provide an Arena in the Millbay area.

Preferred Option 6. East Quay.

9.39. To see this area redeveloped to produce high quality contemporary waterfront development incorporating a mix of uses combining:

1. Residential uses above (approximately 450 units).
2. Cafes, restaurants shops and
3. Employment uses within the B1 class, as well as small-scale marine related industries and possibly craft workshops.
4. Leisure and tourism related uses potentially including an hotel

Preferred Option 7. Reinvigoration of Union Street

9.43. To see Union Street reclaim it's former glory as a vibrant street linking the City Centre to Devonport and serving the communities of Stonehouse to the north and south. The City Council will seek to proactively use development opportunities to secure new uses and improvements to the buildings and the public realm as well as preservation and enhancement of the historic environment.

Preferred Option 8. Stonehouse Creek Site.

9.54. To reserve land for the siting of a new secondary school (if needed) to serve all of the waterfront areas.

Preferred Option 9. The Palace Theatre.

9.62. A high quality restoration of the theatre, for leisure, entertainment and art use, appropriate to the special architectural and historic character of the building and it's setting. Proposals would also need to address the improvements needed to the southern elevation of the building to improve its relationship to the adjoining area, to make a positive impact to the area and restore a landmark building.

Preferred Option 10. Royal William Yard.

9.66. To see the Royal William Yard sensitively restored and reused as a vibrant part of the Stonehouse Peninsula community. Development should provide for an authentically mixed-use development. Some of the buildings (Clarence and Brewhouse) are already being converted to residential (approx 130 dwellings). Brewhouse also has an element of café/restaurant, gallery and commercial space. Further planning permissions will depend upon adequate commitments being made to deliver the full range of uses indicated below:

1. Mills Bakery to contain residential (approx. 80 residential units; retail/leisure; 2500m² of offices

2. *Offices, craft workshops and other employment within B1 Use class – in the Cooperage, the Slaughterhouse and the New Cooperage.*
3. *Leisure, entertainment, and tourism where compatible with a residential area - in the Cooperage*
4. *Marine, leisure or tourism related retail, and small-scale retail to meet local needs.*
5. *Hotel - in the Melville Building*
6. *Community uses.*
7. *Public open space.*

Preferred Option 11. Stonehouse Barracks.

9.74. Should the site be released by the MoD, to grasp the opportunity for creating a vibrant mixed-use development which would contribute towards the creation of a new neighbourhood centre serving the Stonehouse Peninsula. Any development proposed should optimize its waterfront location and its historic assets.

Preferred Option 13. Harwell Street.

9.83. To redevelop the site in accordance with the Harwell Street Planning and Design brief

➤ Core Strategy

Policies 11.9, 12.6, 12.7, 21.1, 23.5

Cattewater developments

No specific policy

Work planned in South Dockyard (modernisation of the site)

No specific policy

Weir Quay – jetties & dry boat storage

No specific policy

Halton Quay expansions

No specific policy

Pottery Quay – housing

No specific policy

Plymouth speedway – near Marsh Mills

No specific policy

Fort Bovisand – possible redevelopment

No specific policy

Hooe Lake – possible development of housing

No specific policy

Devonport – future development

- Plymouth City Council Local Development Framework, preferred options July 2005:

Preferred Option 19. Shopping Centres, 21.9

- Devonport Area Action Plan

Policy 9.

The Preferred Development Options, 9.1,9.5, 9.13, 9.19, 9.23, 9.34, 9.41, 9.50, 9.58, 9.62, 9.56

Preferred Option 1 - South Yard Enclave.

9.1. To recreate the heart of the Devonport community through comprehensive and coordinated redevelopment providing for:

1. The creation of a new district shopping centre, including a new medium sized supermarket (approx 930 sq m), and a similar amount of other comparison retail space for new uses, and relocated retail uses from Marlborough Street.

2. High density residential development as an integral part of the new district centre.

3. A mix of houses and flats throughout the site (approx 500 dwellings).

4. Approximately 2,000 sq m. of B1 employment use

5. Approximately 1,000 sq m. of B2 employment use

6. Approximately 5,000 sq m for a new primary school, potentially as part of a wider mixed use scheme including community and commercial uses.

7. Approximately 1,100 sq m for a Medical /Health LIFT scheme.

Development should provide for:

1. Reuse of the following historic buildings: - the Old Market Hall, which is a listed building, and non listed buildings (such as the old Marks and Spencer building) along the old part of Fore Street within the Enclave where this proves possible

2. An understanding of historic street patterns in helping to form the new streetscape.

3. High quality public realm, open space provision and architecture.

4. High quality physical link to the current Marlborough Street shopping area.

5. 25% Affordable housing.

6. 20% lifetime homes

Preferred Option 2 – MoD Mount Wise

9.5. To see high quality development and restoration of the site, sensitive to its historical significance, which integrates the site into the wider community. The following uses and scale of development would be appropriate: -

1. *B1 employment use (Office development)*
2. *Residential, and non-residential institutional uses, including health or educational / training facilities.*
3. *Sporting facilities.*
4. *Hotel*
5. *Residential (approximately 80 dwellings).*

Development should provide for the following:

6. *Public access (the creation of a private gated community on the site will not be acceptable).*
7. *development to form part of an overall comprehensive and integrated scheme for the site which is acceptable in environmental terms*
8. *development to take place in the context of a Conservation Plan for the site*
9. *Local vehicular access to enable public transport linkages through the site to be realised.*
10. *Pedestrian and cycle access through the site along the Mount Wise headland, providing a vital link in the Green Arc.*
11. *Sensitive restoration and reuse of Admiralty House and Mount Wise House and their attractive landscaped setting.*
12. *Protection of other historic assets and archaeological features on the site, and their setting*
13. *Retention of the cricket pitch, which should be brought into community use, complementing the proposed new recreational facilities at Brickfields.*
14. *Redevelopment of the HMS Vivid site to provide attractive frontage to the cricket pitch.*
15. *25% affordable housing.*
16. *20% lifetime homes.*
17. *Assessment of land contamination and implementation of appropriate mitigation*
18. *Historical interpretation boards.*

Preferred Option 3 – The South Yard Heritage Area

9.13. To see the development of a South Yard Heritage Quarter, involving the sensitive restoration and reuse of historic buildings, and monuments. Uses should include visitor / tourist related facilities, including a Naval Base Visitor Centre, as well as potentially visitor related retail, employment workshops, offices, and training facilities.

Preferred Option 4 - Marlborough Street.

9.19. To enable it to evolve into a mixed use street with significant increase in residential accommodation as well as retail, office, health, and community uses.

Preferred Option 5 – Devonport Conservation Area.

9.23. To review the Devonport Conservation Area boundary with a view to extending it to include MoD Mount Wise, Richmond Walk and Mutton Cove to the south, and areas of historic interest to the north and east.

Preferred Option 7 – North of Granby Green.

9.29. To provide for the demolition and redevelopment of the Council flats on the north side of Granby Green at Granby Green, Park Avenue, Granby Way, St. Aubin Road (approximately 50 Dwellings)

Preferred Option 8 – The Bull Ring, at -Duke Street, Monument Street, Ker Street, and 100-120 Ker Street

9.34. To provide for the demolition and redevelopment of existing Flats approximately 50 Dwellings (40 Bull Ring, and 10 Ker Street)

Preferred Option 10 – Richmond Walk.

9.41. To provide for the retention of waterside and marine related uses. Some limited mixed residential / commercial mixed use may be acceptable.

Preferred Option 12 Redevelopment at Mount Street and Ker Street

9.50. To provide for the demolition and redevelopment of dwellings at Mount Street and Ker Street (approximately 70 Dwellings).

Preferred Option 14

9.58. To provide for the redevelopment of Mount Wise Primary School for mixed use purposes, including residential / mixed use purposes (approximately 35 dwellings).

Preferred Option 15

9.62. To provide for the redevelopment of Marlborough Street Primary School for residential / mixed use purposes (approximately 25 dwellings).

Preferred Option 16

9.66. To provide for the demolition and redevelopment of flats between Marlborough Street Primary School and Morice Street and Albany Street (approximately 50 dwellings).

- Core Strategy

Policies 11.5, 11.9, 21.1, 22.3, 22.4, 22.5

Hazeldene Quarry – residential

- Plymouth City Council Local Development Framework, preferred options July 2005:
- N Plymstock Area Action Plan

Preferred Option 12. Land to West of Sherford and North of Hazeldene Quarry.

9.62. To identify an area to the west of Sherford and North of Hazeldene Quarry as having potential to accommodate long term development, beyond 2016, subject to assessment of need and economic justification through a Plan, Monitor, Manage process.

Policies 9.63, 9.64

- Core Strategy

Policy 29.5

Staddiscombe – residential

No specific policy

Derriford airport

No specific policy

West Devon Borough

West Devon is located at the northern end of the estuary, where the estuary banks are typically steep sided and relatively undeveloped. The District is also predominantly rural and with a prevalence of agricultural land. The District does not therefore contain any key developments that are of significance to the estuary. The impacts of agricultural practice may have an effect on the water quality and ecological values of the area, but this is outside the scope of planning control.

Relevant Plans and Documents:

- West Devon Borough Local Plan Review, March 2005
- West Devon Borough Local Development Framework Core Strategy DPD Preferred Option, May 2006

Caradon District Council

Caradon is the sole authority around the estuary which falls within Cornwall. The key area for development identified within the Local Plan relates to the residential development at Saltash. This is in accordance with RSS and Structure Plan policy which identifies the provision of housing land at Torpoint and Saltash to support the growth of Plymouth. Additionally the possible extension at the Torpoint Marina was

identified in the workshops as was the provision of increased tourism infrastructure at Calstock and Morwellham.

Torpoint – possible marina development

Policy 5.19

Saltash – 1000 residential houses, development upriver or bridges, extension of park

Policies 4.01, 5.10, 5.15, 5.17, 5.24, Policy H9, Policy R2, Policy SA2, Policy SA6, 10.09, 10.19, 1.19

Calstock/Morwellham – infrastructure to support increased tourist numbers

Relevant Plans and Documents:

Caradon Local Plan, adopted December 1999: 1.General Chapters, 3. Saltash Area Statements & 5. Torpoint Area Statements

South Hams District Council

The South Hams area, which skirts the eastern edge of Plymouth has been identified within the RSS as an area to support the sustainable development of the Plymouth Urban Area. Within the district the largest singular growth point at Sherford is identified, which, as previously mentioned is set to provide up to 5500 dwellings by 2016. South Hams also contributes to a relatively large percentage of the overall levels of employment land provision

Sherford – 5500 homes by 2016 with possibility of more by 2026

South Hams Local Development Framework – Core Strategy 2006

5.21, 5.82, 5.23, 6.24, 5.26, 5.32, 5.40, 5.49, 5.52, 5.53, 5.54, 6.3, 6.4, 6.9
Policy CS3, Policy CS4, Policy CS5

South Hams Local Development Framework – Sherford New Community Area Action Plan

1.27, 2.9, 3.4, 4.2, 4.8, 8.2, 8.5, 8.23, 8.29, 14.1, 14.8
See proposal on p30.

Newnham – residential

South Hams Local Development Framework – Sherford New Community Area Action Plan

14.5

Langage – 40ha of employment land and the provision of new power station

South Hams Local Development Framework – Core Strategy 2006

5.40
Policy CS4

South Hams Local Development Framework – Sherford New Community Area Action Plan

8.23

Relevant Plans and Documents:

South Hams Local Development Framework – Core Strategy 2006

South Hams Local Development Framework – Sherford New Community Area Action Plan

Policies for nature conservation and coasts

CARADON DISTRICT COUNCIL

Caradon Local Plan. Adopted December 1999:

Policy CL10: Planning permission will not be granted for development outside of the development limits of settlements within the coastal zone unless:

- It is essential in connection with providing public access to the coast for informal recreation, or,
- It involves alterations, additions or changes of use within the curtilage of existing buildings which would have little impact upon the character of the areas, or,
- The development is essential for the purpose of agriculture or forestry, and is designed to have a minimum impact on the character or the area or;
- The development involves an extension to an existing camping or caravanning site which is necessary to provide an improved layout and the provision of better landscaping and would not result in a significant increase in the number of pitches.
- The development comprises village workshops or affordable housing and is adjacent to the village development limit.

Policy CL12: Development which would destroy or adversely affect, directly or indirectly, a designated or proposed site of special scientific interest (SSSI) or a national nature reserve (NNR) as shown on the proposals map will not be permitted unless the development can be controlled through the use of planning obligations to prevent damaging impacts on wildlife habitats or important physical features, or the importance of the development outweighs the special interest of the site.

Sites which are designated or potential special protection areas, Special areas of conservation or Ramsar sites as shown on the proposals map will be given the same protection as SSSIs, in addition, development proposals likely to have a significant effect on the nature conservation value of such sites will only be permitted when there is no alternative site and there are imperative reasons of overriding public interest. Where

such a site hosts a priority habitat or species, development will only be permitted if required for human health or public safety.

Policy CL13: Development proposals which would adversely affect, directly or indirectly, locally designated nature conservation sites, or the integrity or continuity of other landscape features or major importance to wild fauna or flora will only be permitted where:

- The reason for the development clearly outweighs the decrease in nature conservation value:
- Any damage to the nature conservation interest is minimised
- Mitigating measures can be provided to protect remaining nature conservation and secure habitat creation or enhancement elsewhere within the site or local area.
- The policy applies to AGSVs, CNC sites, RIGS, LNRs as identified on the proposals map.

Policy CL14: The conservation or landscape features which are of major importance for wild flora and fauna, including the creation of new habitats, and provision of public access where acceptable, will be achieved by imposing conditions and seeking planning obligations in relation to development proposals.

Policy CL15: In order to maintain the nature conservation value of the shoreline and adjoining coastal water, development which would cause physical damage, disturbance or pollution will not be granted planning permission. Where essential coastal development is required its siting should be such to minimise ecological damage.

Policy CL16: Development which would have an adverse effect on wildlife species specially protected by law will not be granted planning permission unless mitigating measures are provided.

WEST DEVON BOROUGH COUNCIL

West Devon Borough Local Plan Review- March 2005

Policy NE1

Development that is not connected with or necessary to site management for conservation that would either directly or indirectly adversely affect the integrity of a site that has been proposed to be designated as a Special Area of Conservation, a Special Protection Area or listed under the Ramsar Convention will not be permitted unless:

- The adverse effect will be removed by conditions; or
- There is no alternative solution and the development has to be carried out for imperative reasons of overriding public interest.

Policy NE2

Development that would damage the wildlife habitat or important physical features of an SSSI will not be permitted unless that damage can be prevented by condition or if other material factors are sufficient to override nature conservation considerations

Policy NE3

Development that would harm the ecology or any dependent features of a local nature reserve, county wildlife site or county geological site will not be permitted unless it can be demonstrated that the benefits of it outweigh the wildlife features of the site.

Policy NE4

In determining applications for development the Council will take account of the need to sustain the bio-diversity and earth science resource of the natural environment and to maintain its diversity and distinctiveness. It will seek opportunities to secure its enhancement and management and will consider the use of conditions or planning obligations to mitigate or compensate any adverse impact.

Policy NE6

Where development is likely to have a significant adverse effect (either directly or indirectly) on a statutorily protected species development will not be permitted unless the authority is satisfied that adequate measures have been taken to:

- Facilitate the survival of individual members of the species;
- Reduce disturbance to a level that will ensure survival of individual members of species;
- Provide adequate alternative habitats to sustain at least the current levels of population; and
- That where protected species are known or suspected to occur, a survey is carried out to assess presence and impacts of proposed planning applications.

PLYMOUTH CITY COUNCIL

Core Strategy Plymouth City Council Local Development Framework Core Strategy Preferred Options - July 2005

. The LDF's task will be to seek to:

1. Protect and enhance those strategic greenspaces and water areas that are an essential part of the city's visual / recreational amenity or biodiversity. (This will include the conservation of habitats and species.)
2. Ensure that future development enhances the quality of landscapes and waterscapes, as well as contributing to the city's greenspace network and its biodiversity, particularly where there are deficiencies.
3. Protect important habitats and species, and provide opportunities to enhance biodiversity.
4. Improve access to the countryside and coast, while protecting the urban fringe from unnecessary pressures.

Preferred Option 29. To deliver these environmental objectives through policies which:-

1. Safeguard green spaces which are of strategic and local importance from inappropriate development.
2. Only allow greenspace to be developed where it is justified in support of the preferred spatial strategy.
3. Promote the conservation and enhancement of biodiversity having particular regard to the maintenance, restoration and re-creation of priority habitats and species.
4. Seeks to reduce the consumption of non-renewable resources e.g. water, land, soil, and minerals.

5. Seeks to contribute to renewable energy targets set by the Devon Structure Plan (151MW of electricity production from land based renewable sources by 2010) and the forthcoming Regional Spatial Strategy.

6. Seek to protect people and the environment from unsafe, unhealthy and polluted environments.

Core Strategy - Preferred Options 38

7. Provide support for tackling flooding by giving priority to development in areas of minimal flood risk, unless it can be demonstrated that development in a higher risk area can contribute to more sustainable development, as well as ensuring development includes appropriate provision for sustainable surface water runoff management measures.

City of Plymouth Local Plan (1995 – 2011) First Deposit

Policy 90 Development resulting in the loss of intertidal or sub tidal areas

Development proposals involving the loss intertidal or subtidal areas, either through development or permanent flooding, will not normally be permitted. The only exceptions to this will be where there is no unacceptable impacts on the marine or coastal environment and the development requires a coastal location, would result in urban regeneration or environmental improvement, or is demonstrably in the greater public interest.

In determining the acceptability of an impact regard will be had to the proposal's impact on:

- Statutory and non-statutory nature conservation designations or features or species of importance
- Statutory and non-statutory historic buildings and areas and archaeological designations.
- Navigation rights and needs, and the use of the water for leisure pursuits
- The visual character of the waterfront.

Policy 70: European and national nature conservation sites

Development will not be permitted on or adjacent to a Special Protection Area, (candidate) Special Area of Conservation or Site of Special Scientific Interest if it would harm the value and reason for the designation, unless:

- There is no reasonable alternative solution and the development is necessary for imperative reasons of overriding public interest, in relation to the status of the particular designation, or
- Conditions or agreements can be used to prevent damaging impacts on the value and reason for the subject of the designation.

Policy 71: Protection of landscape features, habitats and species

Existing landscape features, habitats or species which are worthy of protection or retention will be safeguarded. Development will be permitted where:

- Landscape features, habitats and species that are worthy of retention for their townscape, landscape, nature conservation or amenity value are retained,

protected and where appropriate incorporated in the landscaping proposals for the development.

- The development layout is acceptable in relation to the potential impact on the future health or setting of landscape features, habitats or species to be retained
- There are satisfactory proposals for commensurate re-provision of any such feature or species that cannot reasonably be retained in their existing position.

SOUTH HAMS DISTRICT COUNCIL

South Hams Local Plan Review 1995 – 2011 (2002)

G4.25 ENV4: THE COAST

1. In the Coastal Preservation Area, as shown on the Proposals Map, Policy C7 of the Devon Structure Plan First Review will apply.
2. Within the South Devon Heritage Coast, development will only be permitted where:
 - (a) it would not adversely affect the undeveloped character of the coast, the natural beauty of the coastal landscape, or the ecological or geological interest of the coast, and
 - (b) it would not detract from the tranquillity of the area and the quiet enjoyment of the coast for informal recreation.

G4.33 ENV5: EUROPEAN NATURE CONSERVATION SITES

Development which is likely to have a significant effect on a European site or a proposed European site will be subject to the most rigorous examination, in accordance with the procedures set out in the Habitats Regulations 1994. Where development is permitted in accordance with the Habitats Regulations, the use of conditions or planning obligations will be considered in order to avoid and minimise harm to the site, to enhance the sites nature conservation interest and to secure any compensatory measures and appropriate management that may be required.

G4.38 ENV6: NATIONAL NATURE CONSERVATION SITES

Development in or likely to have an adverse effect on a Site of Special Scientific Interest will be subject to special scrutiny. Where such development could have an adverse effect, directly or indirectly, on the special interest of the site it will not be permitted unless the reasons for the development clearly outweigh the harm to the special nature conservation value of the site.

ENV7: LOCAL NATURE CONSERVATION SITES

Development that would harm, either directly or indirectly, the wildlife or geological interest of a: County Wildlife Site, Local Nature Reserve, County Geological Site I or site of equivalent importance will not be permitted unless the need for, or benefits of, the development clearly outweigh the need to safeguard the substantive wildlife or geological value of the site. Where such development is permitted habitat management or compensatory habitat provision will be required in appropriate circumstances.

ENV8: PROTECTED SPECIES

Proposals for development which may have an adverse effect on a statutorily protected species, including a site supporting such a species, will not be permitted unless the authority is satisfied that adequate measures have been taken to:

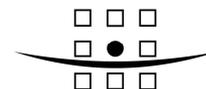
- (a) facilitate the survival of individual members of the species;
- (b) reduce disturbance to a minimum; and

(c) provide adequate alternative habitats to sustain at least the current levels of population in a local context.

ENV9: ACCESS TO NATURE CONSERVATION SITES

The authority will seek to ensure that the public has reasonable, managed access to sites of wildlife and geological interest where this is compatible with their conservation objectives and, where practical, will seek opportunities to maximise their educational and amenity use.

Appendix 3 Guidance For Consultation

**Guidance for consultation**

Presented in the table below are contact details for each potential consultation organisation as well as a short description of their role and the type of development for which they should be consulted.

Organisation	Role	Type of Development to be Consulted for	Contact Details
Associated British Ports (ABP)	ABP's operation within the Port of Plymouth is centred at Millbay Docks. From here they are engaged in commercial activities and are consulted as a major land owner and user of Plymouth Sound.	Any developments that fall within the boundaries of Millbay Docks and the Port of Plymouth.	Associated British Ports, Plymouth Port Office, Millbay Docks, Plymouth PL1 3EF Tel: 01752 662191 Fax: 01752 222070
Defra - Marine Consents and Environment Unit (MCEU)	Responsible, on behalf of the Defra, for the administration of a range of applications for statutory licences and consents to undertake works in tidal waters and at sea. The unit provides advice on the consents required for development below MHWS and the extent of environmental information required to support these consents.	All developments of which any part extends beyond the Mean High Water Springs (MHWS) mark.	Marine Consents & Environment Unit 3 - 8 Whitehall Place (2nd Floor - Area D) London SW1A 2HH www.mceu.gov.uk
Devon County Council	Under the provisions of Schedule 1 of the Town and Country Planning Act (General Development Procedures) Order, 1995, district planning authorities are required to consult with the County Council as Strategic Planning Authority.	Any developments which: 1. Conflict with policies contained within the Development Plan 2. By reason of their scale, nature or location, are of major importance for the implementation of the approved Structure Plan 3. Would prejudice the use of land 'safeguarded' as having minerals or waste disposal potential	Devon County Council Lucombe House, Topsham Road, Exeter, Devon EX2 4QW Tel: 01392 383019 Fax: 01392 382135 planningconsents@plymouth.gov.uk planningpolicy@plymouth.gov.uk coastal@plymouth.gov.uk
Devon Sea Fisheries Committee (DSFC)	Devon Sea Fisheries Committee primary role is the enforcement of European, national and local legislation in relation to the conservation of fish stocks. The Committee's jurisdiction and byelaw making powers extend from the coastline out to 6 miles. All of the	Any developments below MHWS; especially where dredging is involved.	Devon Sea Fisheries Committee Office No.9, Fish Market, The Quay, Brixham, Devon, TQ5 8AW Tel: 01803 854648 Fax: 01803 859217 www.dsfc.aol.com

Organisation	Role	Type of Development to be Consulted for	Contact Details
	<p>Tamar Estuaries, including the western banks of the river are included in the Devon area under an arrangement with Cornwall County Council.</p> <p>They advise on how developments may have a detrimental impact on the commercial fish stocks within the area.</p>		
Caradon District Council	<p>The Development Control Department assesses all Planning Applications for the district and regulates unauthorised development.</p>	<p>Any developments that fall within the administrative boundaries of this council.</p>	<p>Caradon District Council Luxstowe House, Liskeard Cornwall, PL14 3DZ Tel: (01579) 341000 Fax: (01579) 341001</p> <p>www.caradon.gov.uk</p>
Cattewater Harbour Commission	<p>The commission is the Statutory Authority for the Cattewater, having an obligation to conserve, and facilitate the safe use of, the harbour. In addition, the commission is, under the Pilotage Act 1987, the Competent Harbour Authority for the Port of Plymouth and is charged with the assessing the need for pilotage and providing sufficient assets to cover the demand. This duty is carried out within a joined arrangement with the MoD</p>	<p>Any developments that fall within the jurisdiction of the Cattewater Harbour Commission.</p>	<p>Cattewater Harbour Commission 2 The Barbican, Plymouth PL1 2RLR Tel: 01752 665934 Fax: 01752 253624</p> <p>Info@plymouthport.co.uk</p>
Centre for Environment, Fisheries and Aquaculture Science	<p>Cefas is an executive agency of Defra and provides advice on disposal of materials at sea under the Food and Environment Protection Act. They will provide advice on the extent of sediment sampling required to support FEPA applications.</p>	<p>Any developments which require a FEPA license (such as dredging or disposal at sea).</p>	<p>Remembrance Avenue Burnham-on-Crouch Essex CM0 8HA Tel: +44 (0) 1621 787200 Fax: +44 (0) 1621 784989 www.cefas.co.uk</p>
Cornwall County Council	<p>The Planning and Development Control departments of the council comment on Schedule 1 applications within the county. The Environment and Heritage Service are also available to provide advice on nature conservation and historic features of interest and public rights of way within their administrative</p>	<p>Any developments that fall within the administrative boundaries of this council.</p>	<p>Cornwall County Council County Hall, Truro TR1 3AY Tel: 01872 322000</p> <p>www.cornwall.gov.uk</p>

Organisation	Role	Type of Development to be Consulted for	Contact Details
	borders.		
Countryside Agency	The Countryside Agency advise on potential impacts on the landscape character and visual amenities.	All developments that have potential to influence the landscape of an area.	The Countryside Agency 2nd Floor, 11-15 Dix's Field, Exeter EX1 1QA Tel: 01392 477150 Fax: 01392 477151 www.countryside.gov.uk
English Nature	English Nature are the statutory body charged with the role of preserving the wildlife and natural heritage of England, working with land managers and owners on a local basis. English Nature will advise whether "appropriate assessment" is required for development under the Habitats Regulations. They will also advise on the scope of environmental assessment required for developments.	All developments (especially those within SACs, SPA or SSSIs).	www.english-nature.gov.uk English Nature - Devon Team Level 2, Renslade House, Bonhay Rd, Exeter, Devon, EX4 3AW Tel: 01392 889770 Fax: 01392 437999
English Heritage	Government body responsible for the protection of cultural heritage, such as scheduled monuments.	Any developments that have the potential to affect cultural heritage, such as listed buildings, scheduled monuments or conservation areas.	29 Queen Street Bristol www.english-heritage.gov.uk
Environment Agency	Consult on all developments, advising on environmental impacts, also provides on a range of scientific aspects including standards for sampling/monitoring for water and sediment quality, fisheries and waste management. They will also advise on the need for a flood risk assessment and other Environment Agency consents.	All developments	Environment Agency - Cornwall Area Sir John Moore House, Victoria Square, Bodmin, Cornwall, PL31 1EB Fax: 01208 78321 www.environment-agency.gov.uk 08708 506 506
Marine Fisheries Agency (MFA)	The MFA is an executive agency of Defra offers advice regarding influences on fish stocks in the local area.	Developments that extend beyond MHWS, in areas important for fishing. To be	www.mfa.gov.uk Fish Quay, Sutton Harbour, Plymouth, PL4 0LH Tel: 01752 228001 Fax: 01752 221239

Organisation	Role	Type of Development to be Consulted for	Contact Details
		consulted in combination with SFC.	www.defra.gov.uk
National Trust	The National Trust works to preserve and protect the coastline, countryside and buildings of England, Wales and Northern Ireland.	Any developments that may influence National Trust property or land.	Killerton House Broadclyst Exeter EX5 3LE Tel: 01392 881691 Fax: 01392 881954 www.nationaltrust.org.uk
Plymouth City Council	The Planning and Regeneration Service delivers a wide variety of both statutory and non-statutory services which includes Local and Strategic Planning, Planning Applications, Planning Compliance, Coastal Planning and stewardship of the natural and historic environment.	Any developments that fall within the administrative boundaries of this council.	Plymouth City Council Planning & Regeneration, Civic Centre, Plymouth, PL1 2EW Tel: 01752 304354 Fax: 01752 304294 planningconsents@plymouth.gov.uk or planningpolicy@plymouth.gov.uk www.plymouth.gov.uk
Queen's Harbour Master	Established by statute, the Queen's Harbour Master is the harbour authority for the Dockyard Port of Plymouth. They are charged with protecting the Port in the national interest, such that the use by the Royal Navy and other defence interests is assured. Integral in this task is the operational and administrative management of the waters of the Port to the benefit of all users. The harbourmaster will advise on the potential for navigational conflict from developments.	Any developments that fall within the boundaries of or influence the Dockyard Port of Plymouth.	The Queen's Harbour Master, Plymouth Longroon House, RM Stonehouse, Plymouth PL1 3RT Tel: 01752 836485 Fax: 01752 836944
Royal Society for the Protection of Birds (RSPB)	The RSPB provides expert knowledge on the birds present in an area. They can advise on minimising impacts through seasonal development etc.	Any developments that impact sites designated for their importance in bird populations/habitats to support visiting wildfowl.	The RSPB Keble House Southernhay Gardens Exeter Devon EX1 1NT United Kingdom Tel: 01392 432691 www.rspb.org.uk
South Hams AONB Unit	Management of the AONB	Any developments that fall within the South Hams AONB or have the potential to affect	South Devon AONB Unit Follaton House Plymouth Road Totnes, Devon TQ9 5NE

Organisation	Role	Type of Development to be Consulted for	Contact Details
		the site.	01803 861384 enquiries@southdevonaonb.org.uk
Sutton Harbour Company	The Sutton Harbour Company under the Sutton Harbour Acts and Orders 1847 to 1988 is responsible for navigation, quays, the Sutton Harbour Marina, the Fish Market, roadways and other developments within the Harbour.	Any developments that fall inside the jurisdiction of the Sutton Harbour Company.	Sutton Harbour Company North Quay House, Sutton Harbour, Plymouth PL4 0RA Tel: 01752 204186 Fax: 01752 205403
South Hams District Council	Planning and Building Control seeks to ensure that new development is in line with planning policies. They are responsible for processing any planning applications within the South Hams District.	Any developments that fall within the administrative boundaries of this council	South Hams District Council Follaton House Plymouth Road Totnes Devon TQ9 5NE Tel: (01803) 861234 Fax: (01803) 866151 www.south-hams-dc.gov.uk
Tamar Valley AONB Unit	Management of the AONB	Any developments that fall within the Tamar Valley AONB or have the potential to affect the site.	Tamar Valley Service, Cotehele Quay, Cotehele, St Dominick, Saltash, Cornwall, PL12 6TA Tel. / Fax: 01579 351681 http://www.tamarvalley.org.uk
Tamar Estuaries Consultative Forum (TECF)	TECF is a non-statutory partnership that exists to allow collaboration and consultation. Representatives from many organisations sit on this Forum offering a wide knowledge base. TECF hold much data on the nature conservation interests of the estuary and may also act as a focal point for consultation.	Any developments within the Plymouth Sound & Estuaries SAC, and the Tamar Estuaries Complex SPA.	TECF Coastal Management Planning & Regeneration Department of Development Plymouth City Council Civic Centre Plymouth PL1 2EW Tel: 01752 304339 Fax: 01752 304294 www.tamar-estuaries.org.uk
West Devon Borough Council	The Planning and Development Control departments of the council are involved in processing any planning applications for development within it's administrative border.	Any developments that fall within the administrative boundaries of this council.	West Devon Borough Council Kilworthy Park, Tavistock, PL19 0BZ Tel: 01822 813692 Fax: 01822 813634 www.westdevon.gov.uk
Wildlife	Responsible for managing and	Any developments	Devon Wildlife Trust

Organisation	Role	Type of Development to be Consulted for	Contact Details
Trusts	preserving local areas of nature conservation interest, usually within a specific boundary.	that may potentially influence Local Nature Reserves or Wildlife Areas, either directly or indirectly.	<p>35-37 St David's Hill Exeter, Devon, UK EX4 4DA Tel: 01392 279244 Fax: 01392 433221</p> <p>contactus@devonwildlifetrust.org www.devonwildlifetrust.org</p> <p>Cornwall Wildlife Trust Five Acres Allet Truro Cornwall TR4 9DJ Tel: 01872 273939 Fax: 01872 225476</p> <p>info@cornwt.demon.co.uk www.cornwallwildlifetrust.org</p>