SEA/SA

of the Revisions to
Preferred Options for

THE CORE STRATEGY

Volume 2(a)

Prepared for
Plymouth City Council

by

Land Use Consultants

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

1.1. This report (Volume 2a) forms part of Stage C of the Plymouth LDF sustainability appraisal (SA) and strategic environmental assessment (SEA). It constitutes a revision to the SEA/SA of the Preferred Options for the Core Strategy of Plymouth City Council’s local development framework. The original version of Volume 2 and Volume 1 comprising the SEA/SA Context Report were published in July 2005.

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

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

Previous Appraisals and Assessments

1.4. Stage B of the SEA/SA involved the identification and appraisal of issues and options for achieving the objectives of the LDF. It was conducted in the spring, 2005 and resulted in an analysis of the sustainability strengths and weaknesses of each of the Area Action Plans. Those findings have been carried forward where relevant into the existing appraisal. They are reproduced in Volume 3, Appendix 2 for ease of reference.

Current Review of Preferred Options

1.5. There is no formal requirement under the LDF Regulations for revisions to be made to a Preferred Options Document, but Plymouth City Council is using the new spatial planning system in a creative way to enhance the quality of its plans as an on-going process. A number of issues were raised by the public and commercial interests in response to the July 2005 Preferred Options consultations and this has prompted the City Council to consider whether further changes are necessary to its spatial planning policies. These revisions are discussed in this report. Having decided to carry out further consultations on modifications to the Preferred Options the City Council is also taking the opportunity to update the Core Strategy to achieve closer integration with the City’s recently published Local Transport Plan.

1.6. The key changes to preferred options deal with:

- Employment
- Shopping
- Transport
- Derriford and Seaton
- Environment, and
- Community Health, Safety, Well Being and Social Inclusion
**Method of Approach in updating the SEA/SA**

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

1) consider the previous findings of the SEA/SA relating to the Preferred Options (July 2005),
2) note the response of Plymouth City Council to those SEA/SA findings /recommendations,
3) examine the changes made in the Revised Preferred Options, and,
4) assess the nature of those changes and their likely environmental, social and economic impacts.
5) Make recommendations on actions that may be appropriate to achieve further improvements in sustainability.
6) Finally a commentary is provided about the extent to which the revisions have enhanced or prejudiced the sustainability of the overall Core Strategy.

**Presentation of Revised Information**

1.8. This report retains the structure of Volume 2 of the SEA/SA. However, where text relates to preferred options that have been revised the original text is distinguished in italics. New subsections have been added for each topic area where revisions to preferred options have been introduced. All new text in the report is identified by grey shading and a boxed outline.

1.9. The commentary on revised preferred options includes:

a. Plymouth City Council’s response to the July 2005 SEA/SA findings on the original preferred option,

b. A statement of the changes introduced by the revision to the preferred option

c. The revised SEA/SA assessment.
2. APPRAISAL OF THE PREFERRED OPTIONS OF THE CORE STRATEGY

Introduction

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

Assumptions and factors taken into account during the SA/SEA

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

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

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

Risks/Health Warnings

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

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

2.6. It is recommended that Plymouth City Council follows the progress of the findings of the Strategic Sustainability Appraisal of the South West RSS, and works further with its neighbouring authorities, Devon County Council and the South West Regional Assembly as it may be that more opportunities could be explored to ensure negative impacts from development are offset by positive actions within the City or vice versa.

Appraisal of the Preferred Options (July 2005) and Revisions to Selected Preferred Options (April 2006)

2.7. The following paragraphs provide a summary of the findings of the SA/SEA. The overall conclusions and recommendations are set out at the end of this section. It should be noted that due to the holistic nature of some of the preferred options and the tight timescale in which they have been produced only a limited analysis could be undertaken. As noted in paragraph 1.8, the SEA/SA findings on April 2006 Revisions to Preferred Options are contained in boxes and highlighted by shading.

General Comments

2.8. The LDF Core Strategy generally strives to meet the range of sustainability objectives identified during the SA/SEA. However, as discussed at the beginning of this section, there are tensions between the SA/SEA objectives when trying to provide sufficient land and infrastructure for necessary future development within the tight confines of the City.

Specific Comments

2.9. A number of comments are raised the headings of which are based on the formal structure of the draft Core Strategy Preferred Options report.

Planning Policy Context:

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

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\(^1\) Strategic Sustainability Assessment of the South West Regional Spatial Strategy. Stage 1 Scoping Revised Report for Consultation. Prepared for South West Regional Assembly by Land Use Consultants, Collingwood Environmental Planning and Levett-Therivel Sustainability Consultants. 25 August 2004.
2.11. Proposals need to ensure that the LDF is flexible enough to respond to changes in levels of growth, progress is monitored and necessary action is taken.

**The City Vision and the Preferred Spatial Vision:**

2.12. The City Vision and Preferred Spatial Vision support the creation of a thriving city, with a buoyant economy, a diverse range of employment opportunities, services and facilities to meet the needs of all sectors of the community. It is however uncertain from the current proposals whether the high growth targets can avoid development within flood risks areas, achieve equality throughout the city, avoid impacts on nature conservation, landscape, archaeology and heritage and avoid placing pressure on existing utilities and associated infrastructure.

**Sustainable Development:**

2.13. The proposal under this section strongly supports all of the sustainability objectives. However, as discussed in later sections, there will be tensions which will arise as a consequence of high growth and potential negative impacts on the economy, environment and communities.

**The Overall Level of Development:**

2.14. The “Sustainability Growth Distribution Study”, 2005 highlights that the growth scenario for Plymouth will need to rely upon increasing amounts of in-migration (despite allowing for adjustments in the local population and rising economic activity rates) to achieve its target growth. As we have discussed earlier there will need to be a considerable step change to achieve these targets and it is uncertain how realistic they are.

**Delivering Quality:**

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

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

2.17. Given the high level of predicted growth, proposals in the LDF need to take radical steps to reduce the consumption of primary resources, through:
   - Waste minimisation,
   - Reduction in energy and water consumption,

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

**Housing:**

2.18. The Core Strategy proposes a significant increase in the number of dwellings over the Plan period by seeking to provide for 10,000 homes from 2001 to 2016, and accommodating a further 4,500 in South Hams in Sherford, adjoining the City to the east. The strategic approach of locating up to 80% of new housing on previously developed land is welcome, but this still implies that several greenfield sites will have to be allocated for development. This will result in the erosion of landscape character, biodiversity, archaeology, heritage, and impact on adjacent communities and businesses.

2.19. In reviewing sites for Gypsies and Travellers, consideration needs to be given to the provision of adequate infrastructure facilities (water and energy supply) and the siting of development close to the public transport network. Proposals need to be sensitive to adjacent land uses, including the viability of businesses and communities quality of life.

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

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

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

2.23. In reviewing the Preferred Options, consideration needs to be given to the following:

• Is Plymouth going to be a location of choice for people commuting into the location and receiving higher level than average incomes?
Will improvements in connectivity merely widen the scope for employees to choose where to live – resulting in longer and less sustainable travel to work patterns?

Will the makeup of existing communities be altered/ severed through new proposals?

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<th>Housing: Revisions to the SEA/SA</th>
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<td><strong>a) Comments on the SEA/SA</strong></td>
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<tr>
<td>No specific comments have been made by the City Council on the findings of the SEA/SA outlined in the preceding paragraphs.</td>
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<tr>
<td><strong>b) Nature of Revisions to the Preferred Option</strong></td>
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<tr>
<td>No changes have been made to the housing section of the Preferred Options.</td>
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<tr>
<td><strong>c) Revised SEA/SA Assessment</strong></td>
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| Although there are no changes to housing policy, revisions to the key sectors of employment, shopping and transport will have significant effects on the likely effectiveness of housing policy and will also influence all other policies in the core strategy.  
The more targeted approach towards employment generation, an interventionist policy on types of employment and its location, and similar revisions to shopping and transport should help to release more land for housing and focus decisions on areas of housing need and improvement.  
It would be appropriate for the City Council to consider whether revisions to some of the Preferred Option policies require any amendment to the remaining policies in the Core Strategy before the Submission Draft is published. |

**Original Version of the Employment Preferred Option:**

2.24. The City Council has three specific goals; ensuring that there is a sufficient range, mix and quality of employment land and premises, taking a flexible approach to unviable or surplus land/premises and safeguarding strategic employment sites. To respond to these goals, Plymouth has a target of 160 ha of employment land of which 80ha will be within the City limits. The drive towards promoting economic growth and attracting investment, and in turn stability, is critical to the LDF achieving its goals. However such goals will have negative consequences on the environment and communities which will need to be mitigated as far as possible.
2.25. The key negative impacts include the erosion of landscape character, biodiversity and heritage/archaeology, impact on communities’ quality of life, viability of adjacent land uses and displacement of existing businesses and the generation of cumulative effects from incremental development. As with all development, the scale, duration and significance of such impacts will depend on the timing and location of development.

2.26. The conclusion from the review is that proposals need to be carefully monitored to ensure that large employment sites lie close to sustainable modes of transport. Opportunities should be explored to encourage developers to submit Green Travel Plans and adhere to environmental friendly management practices.

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

- Will the creation of new employment sites merely result in the relocation of some businesses to more attractive, new locations having negative consequences on those areas that are vacated?

- What measures will be in place to compensate displaced businesses?

- Are the six priority economic sectors for growth appropriate, given that the above study indicates that advance engineering and marine technologies/industries are “forecast to decline over the period to 2026”

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<th>a)</th>
<th><strong>Plymouth City Council Response to Initial SEA Findings on Employment</strong></th>
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<tr>
<td></td>
<td>The Council will address the issue of mitigation through general policies regarding the environmental impacts of development</td>
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<td>The Council is promoting accessibility of development through its “sustainable community” policies in the Core Strategy</td>
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<td></td>
<td>The Council will promote Green travel plans in the transport section of the Core Strategy</td>
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<td>The Council is addressing the concern about over provision of employment land through its new Employment Land Review and subsequent revised preferred options</td>
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<td></td>
<td>The Council considers that its decision to promote those sectors which add most value to the city’s economy is justified by its new economic visioning.</td>
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b) **Nature of Revisions to the Employment Preferred Options**

The Revised Preferred Options Document emphasises the City Council’s new policy of taking an interventionist approach towards employment provision. This targets specific employment sectors and reflects a more sophisticated approach towards calculating employment land demand. As a result the amount of land to be safeguarded will drop from 80 to 57 hectares.

Five themes have been developed under the emerging economic strategy. These aim to diversify the business base, promote skills and learning, improve infrastructure and access, promote economic inclusion and encourage leadership and governance.

The spatial planning implications of delivering these goals include:
- The need to provide and protect land of sufficient quantity and quality in the right locations,
- Proactive policies to encourage small and micro-businesses,
- Strengthening the regional centre
- Supporting inward investment
- Improving opportunities for investors,
- Making better use of higher education facilities

The City Council’s revisions of Preferred Options 14 and 15 are based on detailed analysis of new data and consultations including:
- Sustainable Growth Distribution Study 2005,
- Economic Visioning conference findings,
- Employment Land Review 2006.

In response, the City Council has defined a goal to ‘set a spatial planning framework through the LDF which supports the Council’s Economic Vision and Strategy, helping to make Plymouth a place where people, business and an outstanding environment together bring about sustainable prosperity and well being for all.

The authority has set specific targets to help deliver the goal within the period (2001-2016) which are:
- Delivery of 57 ha of new employment land
- Delivery of 200,000 sq.m new office development
- Net increase in employees of 24,000
- Identification of at least one inward investment site of high quality

c) **Revised SEA/SA Assessment on Employment**

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

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

The proposals recommended in Preferred Option 14 are relatively supportive of the sustainability objectives, however there are still likely to be a significant number of uncertain effects. Any new developments should be sensitively sited, so as to avoid detrimental effects on nature, environment (e.g. sensitive intertidal zones etc) and biodiversity.

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

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

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

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

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

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

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

2.28. These proposals are generally supported against the sustainability objectives. They seek to redress the imbalance in retail provision and concentrate development in local and district centres which are accessible by sustainable transport modes and will help to develop sustainable communities. Proposals should encourage a diversity of employment opportunities and support the vitality and viability of commercial centres.

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

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

a) Plymouth City Council Response to Initial SEA Findings on Retail

In terms of the sustainability appraisal, the Council accepts the conclusions reached and will develop policies to ensure that these issues are addressed.

b) Nature of Revisions to the Preferred Option

The City Council has reviewed a number of alternative policy approaches to retailing including adopting:
- a market-led strategy,
- a proactive policy to deliver the spatial vision,
- proactively addressing deficits in shopping provision in the western and other parts of the City,
- responding to unmet demand for bulky goods shopping.

Its revised preferred option is to focus activity on reinforcing the City Centre as a regional shopping centre in the short to medium term. In the longer term there is scope for developing one or more shopping schemes to support the rising population. Beyond 2021 long term growth in shopping provision would be directed primarily to the City Centre and Derriford. This takes account of the findings of a new shopping study for Plymouth (Cushman Wakefield).

The City Council’s goal is ‘to promote new shopping development which contributes positively to delivering Plymouth’s vision for sustainable high quality growth, making Plymouth a city of sustainable linked communities’.

Specific targets towards reaching this goal include:
- Increasing retail capacity for comparison goods by between 35,000 and 50,000 sq. m net by 2016,
- Increasing retail capacity for comparison goods by between 75,000 and 110,000 sq m net by 2021
- Delivering new centres at Devonport, Weston Mill and...
Derriford by 2016,
- Delivering a consolidated retail warehouse location on Laira Embankment by 2016,
- Completing a revised shopping study for Plymouth by 2011.

Preferred Options 16-19 have been revised to deliver the goal and targets.

c) **Revised SEA/SA Assessment on Retail / Shopping**

The focus on achieving a vibrant retail sector within the City Centre is one of the key elements of the Vision for Plymouth, and is supported in the emerging LDF strategy.

The LDF strategy identifies Derriford as a location, in addition to the city centre, to accommodate major new growth in the long term, but also promotes the concept of a new district centre in the shorter term – this being focussed primarily on convenience and complementary comparison shopping and services. The shopping study provides evidence to support this strategy in terms of its potential impact on the city centre, and the Council will need to satisfy itself that the nature and scale of development is appropriate in relation to the primary objective of protecting the city centre.

This highlights the importance of the timing for progressive development, beginning with consolidation of the existing investment in the Centre.

The SEA/SA strongly endorses the revisions to preferred option policies 16-18 which seek to deliver these goals.

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**Culture and evening/night economy:**

2.31. The LDF proposals take a positive approach to redressing the conflict between promotion of evening/night uses and communities while at the same time protecting communities’ quality of life, encouraging diversity and new employment opportunities. However as our review has highlighted, it may be difficult to encourage alternative new development in areas where there are existing problems with drinking establishments/night clubs. In addition, in tourist and leisure locations care needs to be taken to ensure that proposals do not impact on communities’ quality of life during the day and night.

2.32. Incentives may have to be offered for new businesses to locate in areas suffering problems with excessive noise, litter, crime and antisocial behaviour through, for example, low business rentals. Concentration of land uses associated with evening use must be closely monitored to ensure it does not exceed capacity, and for tourist/leisure areas of the City, a detailed assessment should be undertaken into the carrying capacity of the area for tourists.
Culture and evening/night economy: Revisions to the SEA/SA

a) Comments on the SEA/SA

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

b) Nature of Revisions to the Preferred Option

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

c) Revised SEA/SA Assessment

The revised policies on employment, shopping and transport should help to stimulate culture and the evening/night economy within key locations of the city and improve the sustainability of these uses. It will be important to ensure that other less accessible areas of the city do not lose out from concentration of key resources in the city and district centres.

Education/Skills:

2.33. Proposals to invest in educational facilities and infrastructure, reuse existing infrastructure and widen the community use of school facilities are a very positive opportunity to improve access to learning, skills and training for all ages and improve community integration. Potential negative effects or uncertainties are associated with the erosion on landscape, biodiversity, archaeology and heritage through new school development. In addition, falling birth rates and smaller school roles could result in the need to widen school catchment areas which may, in turn, create a pressure on the existing public transport network.

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

Education and Skills: Revisions to the SEA/SA

a) Comments on the SEA/SA

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

b) Nature of Revisions to the Preferred Option

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

c) Revised SEA/SA Assessment

There is increased emphasis on skills training and higher education which will help to ensure delivery of the relevant sustainability objectives.
2.35. Proposals relating to improvements in connectivity and transport in urban areas should instil greater business confidence, strengthen existing/future business sectors, overcome issues relating to social exclusion and deprivation, encourage more flexible working and to a lesser extent (depending on the mode of transport) have positive effects on air pollution and greenhouse gases.

2.36. Potential negative effects relate to the erosion of landscape character, biodiversity, archaeology and heritage, the severance of existing communities, the loss of important corridors for walking and cycling through the safeguarding of land for future development and the impact on adjacent land uses including the viability of local businesses and communities’ quality of life. In addition, whilst proposals seek to reduce vehicular emissions through the development of a Mass Transit Network with transport hubs and associated facilities and transport improvements by rail and sea, the promotion of a regional airport will result in an increase in air flights with negative consequences on greenhouse gases.

2.37. Added to this, the preferred options infer the application of “maximum car parking standards” but do not conclude whether there is a ceiling for the number of car parking spaces per household or per number of employees.

2.38. A number of questions face Plymouth City:

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

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

*a) Comments on the SEA/SA*

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

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

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

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

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

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

Changes are proposed to the preferred options on transport following revisions to the Local Transport Plan (LTP2), a study into transport aspects of the Eastern Corridor and further study on the future role of Plymouth airport.

The review of transport issues by the City Council has included a number of alternative approaches including continuing current policies and accepting the resulting adverse impacts on quality of life; increasing road capacity and parking facilities; and promoting sustainable transport alternatives to the above.

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

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

Three key studies have been undertaken since the Core Strategy Preferred Options Report relating to the Final Local Transport Plan (LTP2), public transport options for the Easter Corridor and a study into the future role of Plymouth Airport. As part of the reappraisal of the key changes to the Preferred Options for the Core Strategy these studies were reviewed as well as the Council’s Revised Core Strategy Objectives and Strategy diagram. No changes have been made to Preferred Option 25.

LTP2

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

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

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

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

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

Emerging Eastern Corridor Strategy

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

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

Emerging Strategy for Plymouth Airport

2.40. The Plymouth Airport Study has considered a range of scenarios ranging from “do nothing” to two different options for runway extensions, a shorter one which can accommodate the next generation of turbo props and a longer one which can accommodate smaller jets. It concluded that the shorter runway extension was the preferred option. It also considered whether there were other possible locations for an airport – but concluded that improving the existing site was the only viable option. The preferred option also involves infrastructure improvements to the airport including the decommissioning of the shorter runway, extensions of the terminal and redesign and enhancement of the engine testing facilities to reduce a source of noise pollution. The proposal is likely to result in significant positive benefits for the local economy and minimise travel to other regional airports. However, it is uncertain what number of effects there will be and these will need to be assessed through an Environmental Impact Assessment as detailed proposals are developed. Other potential impacts that will need testing include potential visual impact through night glare, the impact of a larger airport apron, and the additional vehicular movements to and from the airport if a modal switch to alternative modes of transport cannot be achieved. These effects could potentially impact on adjacent communities’ quality of life and health, and so appropriate assessments and mitigation will need to be planned.

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

**The Revised Core Strategy Strategic Objective**

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

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

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

**Waste:**

2.41. The urgent requirement to respond to a rapidly declining capacity to send waste to landfill is recognised in the LDF but the SEA/SA assessment team doubts whether sufficient action is being taken by the City to bring about a change in public attitudes leading to reduction of waste at source and an appropriate level of recycling. Despite the wish for Plymouth to be self sufficient and adhere to the proximity principle, the interim proposals to transport waste beyond the City limits in response to a diminishing land fill capacity at Chelson Meadows are unsustainable in the longer term. In addition, it is uncertain from the Core Strategy where waste will be transported to, what capacity such sites have and how waste will be transported. These concerns are stated baldly because this issue is seen as one of the most important affecting Plymouth’s aspirations to realise its vision as a role model amongst European cities.

2.42. Negative impacts of waste relate to air and noise pollution, odour, health, quality of life, the impact on adjacent land uses and vehicular use in transporting waste potentially long distances. These impacts will be exacerbated if waste managers have difficulties responding to the enormity of the task and new development commences within the next five years.

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

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

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

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

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

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

c) **Revised SEA/SA Assessment**

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

**Minerals:**

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

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

a) Comments on the SEA/SA

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

b) Nature of Revisions to the Preferred Option

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

c) Revised SEA/SA Assessment

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

Original Version of Environment and Greenscape:

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

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

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

Environment and Greenscape: Revisions to the SEA/SA

a) Comments on the SEA/SA

The Council has decided that the issue of protecting green space and biodiversity can be addressed through a policy on the city’s green infrastructure, as well as a general pollution control policy.

The Council is addressing the concern about flood risk through its new
Strategic Flood Risk Assessment

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

The Council will address issues raised relating to Design Principles through a strategic Design Policy, supported by a supporting Supplementary Planning Document on design matters.

b) Nature of Revisions to the Preferred Option

The key changes outlined in this document in relation to the environment are mainly in relation to steering development to sites with the lowest probability of flooding, and in addressing issues relating to existing developments in flood risk areas. Accordingly a Strategic Flood Risk Assessment and an assessment of key Criteria Based Policies has been carried out, and a further Preferred Option has been added.

c) Revised SEA/SA Assessment

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

Original Version of Community Health, Safety, Well Being and Social Inclusion:

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

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

- overcome isolation through improvements in public transport,
- improve the quality of housing, public and green spaces,
- tackle poverty through improved insulation (lifetime home standards),
• Reduce levels of unemployment,
• Improve literacy and numeracy,
• Achieve minimise standards from drinking water,
• Improve on vehicular exhaust emission standards.4

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

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

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<thead>
<tr>
<th>Community Health, Safety, Well Being and Social Inclusion: Revisions to the SEA/SA</th>
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<tr>
<td><strong>a) Comments on the SEA/SA</strong></td>
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<tr>
<td>The Council aims to address the potential negative effects on landscape, biodiversity and archaeology, of finding sites for new facilities through mitigation in the general policies regarding the environmental impacts of development</td>
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<tr>
<td>The Council states that the requirements of PPG17, in particular providing an assessment of future need for sports/playing pitches will be met by Plymouth’s Playing Pitch Strategy 2006-16.</td>
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<tr>
<td>The Council is assessing local needs through Sustainable Neighbourhood Assessments currently being prepared</td>
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<th><strong>b) Nature of Revisions to the Preferred Option</strong></th>
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<tbody>
<tr>
<td>Although no key changes were proposed to the Preferred Options 30-36 in relation to this section, the text of the preferred options has responded to a number of uncertainties raised by the SEA.</td>
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4 Out City’s Health – A framework to inform, influence and challenge partners to improve health and well being and reduce health inequalities across Plymouth, Plymouth Public Health Development Unit, 2005
Core Strategy S106 Obligations:

2.53. At face value, this proposal is positive in terms of generating opportunities to support affordable housing, education provision, access, local labour/training initiatives, nature conservation, public area, public realm works and recreation including the provision for open space, sports and recreation. However, in practical terms it is not possible to test the proposal itself against the Sustainability Objectives without knowing details of the measured to be taken.

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

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Building Sustainable Linked Neighbourhoods:

2.55. The proposal is supportive of sustainability objectives; creating sustainable districts and local neighbourhoods where people can both live and work, instilling investor confidence, reducing the need to travel elsewhere for services and facilities and improving the quality of the infrastructure. Whilst there are no negative effects, there are a number of uncertainties associated with how new residential development will link in with existing communities, whether the demographic profile will alter and how future increases in population over and above figures identified in the LDF will be achieved.

2.56. In reviewing development proposals, the cumulative impacts need to be monitored and carrying capacity of specific areas determined to ensure local communities quality of life is unaffected and the demographic makeup is not altered.
Building Sustainable Linked Neighbourhoods: Revisions to the SEA/SA

a) Comments on the SEA/SA

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

b) Nature of Revisions to the Preferred Option

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

c) Revised SEA/SA Assessment

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

Area Visions and Strategies:

2.57. Nine area visions and strategies have been prepared as part of the Core Strategy covering:

- Devonport
- Millbay and Stonehouse
- The City Centre
- The Hoe
- Sutton Harbour
- East End
- Central Park
- North Plymstock
- Derriford, Seaton and Southway

2.58. Whilst all of the area visions/strategies broadly coincide with sustainability objectives a number of issues are raised from the SA/SEA review. As these points apply to most of the areas, they have been summarised in the list below:

- What measures can be introduced to ensure that new employment opportunities are available to local employees/unemployed rather than encouraging in-migration?
- Will future proposals upset the existing demographic profile in the area in question and will this have a positive or negative effect?
- Will achieving a high quality environment prejudice existing local communities by driving up costs of housing and increasing costs of convenience purchases?
- Have the impacts on communities’ quality of life from adjacent land uses (relating to night/evening economies, waste, minerals and industrial activities) been fully considered?
- Have the impacts on adjacent land uses from new development proposals been considered and will the viability of such uses suffer?
- Will there be impacts on aquatic habitats from waterside developments and, in particular, marine related industries?
• Have issues relating to overshadowing, wind funnelling and visual impacts been considered in the siting of development within high density locations?
• In areas where there will be an increase in visitor activity has consideration been given to the provision of a public transport service both day and night?
• Has the carrying capacity/threshold for visitors been determined in prime tourist areas within the City and how will this be monitored?
• What measures have been taken to minimise car parking provision?
• Is there an opportunity for dual use of facilities especially in higher density locations?
• How will the development integrate visually with other features/developments on the skyline?
• What will be the impact on displaced land uses including bad neighbourhood land uses and the implications of travel for local employees?
• Will short term impacts associated with construction and relating largely to air, noise and water pollution be mitigated?
• During the operation/implementation phase of a development, how will issues relating to vibration, noise, odour, air pollution and the movement of heavy vehicles be overcome?
• What is the proximity of development to areas at high risk of flooding?
• How will further recreational pressures from increased development and population on adjacent sites of important landscape, nature conservation, archaeological and heritage interest be overcome?

We recognise that the LDF will not be able to address some of these questions immediately, but would wish these questions to be considered when future proposals are brought forward.

2.59. All Area visions and strategies need to reflect clear design principles which seek to achieve high quality design and the use of sustainable design and construction techniques. Proposals must ensure that the following issues are dealt with (some of which are covered elsewhere in the LDF):

• Design out crime,
• Encourage the reuse of construction and demolition of waste in new development,
• Promote the sourcing of local materials to reduce vehicular trips,
• Reduce energy and water consumption,
• Minimise waste generation,
• Ensure that there is adequate provision of green space for formal and informal recreation,
• Ensure that development reflects local distinctiveness,
• Minimise car parking provision.

It should be noted that for many of the area action plans it is only possible to make limited judgements about the sustainability of the individual visions/strategies, in the absence of a clear understanding about the proportion of housing and employment land allocations, the relationship of areas to proposed improvements in the public transport network and car parking standards.
Area Visions and Strategies: Revisions to the SEA/SA

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

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

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

The key changes outlined in this document in relation to Derriford and Seaton, are mainly in relation to creating a new sustainable urban centre in north Plymouth.

c) **Revised SEA/SA Assessment:**

The Revised Preferred Option 47 aims to create a thriving sustainable urban centre in north Plymouth which is well connected to surrounding communities and the city’s high quality public transport network. The underlying concept should enhance economic growth, and create employment in a variety of sectors through a diverse mix of land uses, and there is potential to enhance the quality of the built environment.

In terms of sustainable resource use, success will depend in part on whether the proposals result in the reuse of existing buildings and infrastructure and whether materials used for previous construction works can be reused in the new development. There could be opportunities to minimise consumption and waste generation, however, any new development will inevitably increase resource and energy use.

The revised policies are likely to have positive impacts on the health of communities with the provision of leisure facilities, improved transport links and the provision of education at all levels. Improvements made to the airport are likely to have positive impacts in terms of strategic transport links but detailed proposals must be subject to Environmental Impact Assessment to demonstrate the environmental impacts and to deliver mitigation measures. These developments are likely to increase demand for housing in these areas, in line with the improvements in leisure, retail, employment and transport provision. The proposals may have both positive and negative effects on district centres. Their nature will depend on the success with which all policies are integrated. Given the scale of the changes envisaged the City Council should give careful consideration to the most appropriate forms of project management and monitoring for overseeing both public sector and commercial investment.

Supporting the region’s long term economic well being, through developing the sites at Derriford and Seaton will require that careful consideration is given to the environment, as extensions to the airport for example could have negative effects on landscape and biodiversity.

In supporting the predicted long term growth in north Plymouth, it will be important to ensure that the health and well being of the city centre is prioritised.

With the creation of a ‘northern gateway’ there is potential for a positive impact on
either the enhancement or preservation of the built and historic environment. This will depend on what activities/works are planned for the site. These proposals should have a positive impact on natural and historic environment and on community health but there are inherent risks to maintaining the quality of the existing network of green spaces, views and historic environment, and enhancing access to these areas.

Conclusions and Recommendations

2.60. Many of the proposals and in particular the area visions and strategies are reliant on future investment, land negotiations and compulsory purchase orders. The success of elements of an area’s vision depend on the phasing of development occurring and its relationship with adjacent land uses. Conflicts between adjacent land uses could easily occur if the phasing of development does not materialise or negotiations provide unsuccessful. In some cases, this could lead to significant negative impacts.

2.61. A primary challenge facing Plymouth is to retain both existing and future workers, who given the more diverse range of employment and incomes on offer could be more likely to choose to live elsewhere, attracted by a better quality of life. A substantial level of investment needs to be made in the quality of the environment, and in infrastructure and public transport network for future workers to encourage them to make a lifestyle shift. In consequence the City Council will need to consider what level of risk it is prepared to take in making its commitment to the overall vision.

2.62. Inevitably there will be environmental impacts associated with providing the required housing, employment land and associated infrastructure to meet the needs of the City to 2016. There will be particular pressures on the loss of greenfield land, landscape character and habitats if the planned urban extension goes ahead.

2.63. Challenges may also arise when trying to provide development that is in keeping with the historic character and setting of City, but also incorporates sustainable construction and design measures such as re-use of construction and demolition materials, the sourcing of local materials, water and energy efficiency measures or providing storage for waste to be recycled and adequate recycling facilities. In addition, it seems reasonable to question whether should more be done to adhere to sustainable design in new development and raise targets above 20% for lifetime home standard dwellings?

2.64. Without provision of adequate, reliable public transport network, car dependency and use will increase, having the negative effects of exacerbating traffic congestion and increasing air pollution contributing to climate change.

2.65. The City needs to consider taking a proactive stance to flood risk and rising sea level through the careful siting and design of development.
**Recommendations**

- The Core Strategy needs more text describing the context and supporting information for the Core Policies in order to establish a better link between the Core Strategy Preferred Options and Area Action Plans.

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

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

- Apart from working with CABE for large scale developments, a Design Guide should be produced for all development on the re-use of construction and demolition materials on site, for example through planning conditions requiring developers to provide a demolition plan and cover efficient water and energy use as part of the sustainable construction and design guidance.

**CONCLUSIONS AND RECOMMENDATIONS**

This review of changes to the Preferred Options and the related alternatives has shown that in general the revisions have strengthened the overall sustainability of the Core Strategy.

However, a number of the key changes (especially those relating to employment, and shopping have the potential to affect other areas of policy and the SEA/SA recommends that Plymouth City Council should look closely at the interactions between all policies and the need to achieve maximum synergies between them.
3. MONITORING FRAMEWORK

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

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

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

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

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

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

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

**Suggested monitoring regime for the Plymouth SEAs**

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

*European Commission (2003)*

3.7. Ideally, the monitoring arrangements required for ensuring the delivery of sustainability objectives will be built into routine annual monitoring programmes for ensuring that all other aspects of the plan are on course.