SEA/SA
OF THE SUBMISSION VERSION
OF THE
DEVONPORT
Area Action Plan
Volume 2

September 2006
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I. STATUS OF THE REPORT

Introduction

1.1. This report (Volume 2) concludes Stage C of the sustainability appraisal (SA) and strategic environmental assessment (SEA). It constitutes the Draft SEA Environmental Report and SA of the Submission Version of the Devonport Area Action Plan (AAP). 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 Submission Version of the Area Action Plan this report contains a reference to future monitoring requirements.

Previous Appraisals and Assessments

1.3. Plymouth City Council prepared a Preferred Options Report for the Devonport Area Action Plan in July 2005 and that document (together with the Preferred Options of the Core Strategy) was subjected to Stage C of the Strategic Environmental Assessment and Sustainability Appraisal (SEA/SA). An earlier exercise (Stage B of the SEA/SA) had been undertaken in the Spring 2005 in relation to Issues and Options for achieving the objectives of the LDF. Both of these stages of the SEA/SA assessed the sustainability strengths and weaknesses of the Devonport (and other) Area Action Plan(s). Those findings have been carried forward where relevant into the existing appraisal.

1.4. The Submission Version of the Devonport AAP September 2006 contains substantially more detail than the previous Preferred Options Report. In addition, the Preferred Options for the Core Strategy have been substantially revised (in April 2006 and July 2006). The revisions to the Core Strategy are reviewed in a separate document (SEA/SA of LDF Core Strategy - Volume 2 (Revised July 2006). The SEA/SA of the submitted version of the Core Strategy has also complete (Volume 2, revised July 2006).

1.5. For the record, the July 2006 findings of SEA/SA comments on the Submitted Core Strategy references to Devonport AAP are repeated below for ease of reference.

SEA Commentary on Submitted Core Strategy Derriford Area Vision

1.6. Devonport: Further work has been undertaken to expand on this section, setting the context, identifying the key issues, objectives for the area vision and describing where the emphasis of development should lie. Devonport in particular suffers from poor housing conditions, poor environment, poor health, a lack of choice in housing, high unemployment and crime rates stemming from recent substantial job losses in the defence sector and a predominance of social housing replacing private housing following heavy bombing during World War 2.

1.7. The Submission Draft Area Vision has been improved since the June 2005 edition, preferred option 26 to include objectives relating to improvements to the:
• range, quality and choice housing;
• local employment opportunities;
• range of local services and facilities;
• connectivity through the community;
• protection of natural and historic assets;
• high quality development which is safe and appropriate in the context of Devonport's heritage.
The Current Report

1.8. This document sums up the comments that have been made throughout the SEA/SA process on the sustainability and potential social, environmental and economic impacts that could result from the strategies, plans, objectives, policies and targets and proposals contained in the Submission Version of the Devonport Area Action Plan. The SEA/SA process has run concurrently with plan making, and Plymouth City Council have carefully considered the observations and recommendations of the SEA team in revising successive drafts of the AAP. The current report itself has been through a staged process, involving roundtable discussions and then the preparation of this report.

1.9. As a result of this close collaboration, the overall sustainability of the planning proposals has been enhanced. However tensions inevitably remain between some competing objectives of the AAP and so this Draft SEA/SA report still contains a number of cautionary remarks and recommendations. It is also important to recognise that plan making is only part of the story, and the most crucial stage in delivering the vision for Plymouth is only just beginning – that of implementation.

The Next Steps

1.10. The SEA/SA and Submission Draft of the Devonport Area Action Plan will be delivered to the Government Office for the South West and to the Planning Inspectorate and will be published. Any objections from the public and stakeholders that are raised on the grounds of soundness may be considered at a public examination conducted by an independent planning inspector. The inspector will then prepare a report of findings which are binding on Plymouth City Council. The Council will subsequently adopt the Devonport Area Action Plan with any revisions or amendments specified by the inspector.

Method of Approach in updating the SEA/SA

1.11. The previous SEA/SAs for the Devonport AAP have been completed by Land Use Consultants. This reappraisal has been completed in-house by Plymouth City Council Planning and Regeneration officers. The approach which has been adopted in this part of the SEA/SA has been to:

1. Consider the previous findings of the SEA/SA relating to the Preferred Options (July, 2005), and incorporate recommendations into the Submission Version (September 2006)

2. Consider the findings of the Core Strategy Submission Draft SEA/SA (July 2006), and incorporate findings into the Submission Version (September 2006)

3. Examine the changes made to the Preferred Options in the preparation of the Devonport Submission Version AAP (September 2006)

4. Assess the nature of those changes and their likely environmental, social and economic impacts,
5. Make recommendations on actions that may be appropriate to achieve further improvements in sustainability, and

6. Provide a final commentary on the extent to which the revisions have enhanced or prejudiced the sustainability of the AAP.

Presentation of Revised Information

1.12. This report concentrates on the sustainability and the potential environmental impacts of policies, plans and proposals as they are set out in the Submission Draft. As the structure of the Area Action Plan has changed significantly from the Preferred Options, July 2005 contained in the earlier SEA/SA Report July 2005, the present report follows the order of the Policies of the AAP Submission Version Report (September 2006). The text from the relevant Preferred Option, as discussed in Volume 2 (July 2005), is presented in italics. Any changes to the Preferred Options, July 2005 which have been identified in the latest Policies are identified within the shaded box at the end of each Policy section. The box also contains the revised SEA/SA Assessment (September 2006).
2. APPRAISAL OF THE PREFERRED OPTIONS AND SUBMISSION VERSION FOR DEVONPORT AREA ACTION PLAN

Introduction

2.1. This chapter is split into three parts, it firstly provides a summary of findings of the SEA/SA of the Preferred Options, and secondly an SEA/SA of Policies/Proposals that were not included in the Preferred Options but are found in the Submission Draft. The third section discusses the findings of the Submission Draft Devonport Area Action Plan SEA/SA. The overall conclusions and recommendations are set out at the end of this section.

In addition to the review of policies and proposals for the Area Action Plan this report contains a reference to future monitoring requirements.

Appraisal of the Preferred Options for the AAP

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

Reviewing the SA Objectives against the Preferred Option Principles

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

- It is important to ensure that in new development proposals an adequate amount/type of open space is retained
- Further details need to be provided in relation to public transport and car parking provision. Will the AAP be seeking to reduce parking provision in residential areas?
- The design and construction of buildings should seek not only to reduce energy consumption but also reduce water consumption, ensure that materials are sourced locally and use secondary materials where possible.
- Proposals should ensure that existing communities are not adversely affected by compulsory purchase orders and that they are not “out priced” of the housing market; this means a range of housing stock and type needs to be made available.
- Proposals should seek to support local employment opportunities during construction and implementation.
<table>
<thead>
<tr>
<th>SA Objectives</th>
<th>Devonport Principles</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>BIODIVERSITY</strong> – Biodiversity and landscape are properly valued, conserved and enhanced</td>
<td>A population able to sustain local services – making the best use of precious brownfield land, by building to a density sufficient to sustain mixed use development which bring basic amenities within walking distance and supports public transport</td>
</tr>
<tr>
<td><strong>POLLUTION</strong> – Pollution is limited to levels which do not damage natural systems</td>
<td>A highly accessible movement framework – based around an urban structure of interconnected streets, footpaths and cycleways and a high quality public transport network</td>
</tr>
<tr>
<td><strong>CLIMATE CHANGE</strong> – Emissions contributing to climate change are reduced and adaptation measures are in place</td>
<td>Distinctive urban design and architecture – that reflects Devonport’s distinctive character and identity</td>
</tr>
<tr>
<td><strong>RESOURCES</strong> – Demands on natural resources are managed so that they are used as efficiently as possible</td>
<td>A mix of well integrated uses – located within a structure of perimeter blocks that creates a vital and vibrant area and brings amenities, living and working areas closer together</td>
</tr>
<tr>
<td><strong>ENERGY</strong> – Efficient use of energy</td>
<td>A range of high quality homes – which encompasses both a range of tenures, residential and commercial, closely knitted to encourage social and economic cohesion and opportunity, and housing types to suit differing needs provided to a high quality that creates far higher living standards and diversified the socio economic profile of the area</td>
</tr>
<tr>
<td><strong>WASTE</strong> – Waste is minimised and, wherever possible, eliminated</td>
<td>Maximising energy efficiency – optimising the use of energy efficiency and renewable energy applications, water conservation and reuse. New buildings will be encouraged to embrace the principles of sustainable development, in terms of energy efficiency and the use of recycled materials and materials from renewable energy resources</td>
</tr>
<tr>
<td><strong>ECONOMY</strong> – A diverse and thriving economy</td>
<td>A healthy and safe environment providing high quality healthcare and an urban area that is secure by design that has a range of attractive sports, recreational and cultural attractions and which makes the most of Devonport’s waterfront setting and rich heritage</td>
</tr>
<tr>
<td><strong>WORK AND INCOMES</strong> – Everyone has access to satisfying and fairly paid work and unpaid work is valued</td>
<td>Improving education for all – providing a range of high quality facilities offering the potential for lifelong learning</td>
</tr>
<tr>
<td><strong>LOCAL NEEDS</strong> – Wherever possible, local needs are met locally so support local economies</td>
<td>Developing employment opportunities – containing a diversity of jobs, linked to training and skills development</td>
</tr>
<tr>
<td><strong>HEALTH &amp; WELL-BEING</strong> – Promoting everyone’s physical and mental wellbeing</td>
<td></td>
</tr>
<tr>
<td><strong>LEARNING</strong> – Everyone has access to lifelong learning, training opportunities, skills and knowledge</td>
<td></td>
</tr>
<tr>
<td><strong>SAFETY</strong> – Everyone is able to live without fear of crime or persecution</td>
<td></td>
</tr>
<tr>
<td><strong>DISTINCTIVENESS AND CULTURAL HERITAGE</strong> – Diversity and local distinctiveness and cultural heritage are valued, protected and celebrated</td>
<td></td>
</tr>
<tr>
<td><strong>LEISURE</strong> – Opportunities for culture, leisure and recreation are provided widely</td>
<td></td>
</tr>
<tr>
<td><strong>TRANSPORT AND ACCESS</strong> – Offering inclusive access to all service, including access for those without a car</td>
<td></td>
</tr>
<tr>
<td><strong>BASIC NEEDS, EQUALITY AND DIVERSITY</strong> – Ensuring community cohesion, tolerance, understanding and equality of opportunity</td>
<td></td>
</tr>
<tr>
<td><strong>DEMOCRACY</strong> – All sections of the community are empowered to participate in decision making</td>
<td></td>
</tr>
</tbody>
</table>
**Appraisal of each Preferred Options**

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

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

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

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

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

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

**Key Findings**

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

2.6. Sustainability scores in **Table 2** are based on the following ranking:

<table>
<thead>
<tr>
<th>Key</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td>Strongly sustainable</td>
</tr>
<tr>
<td>1</td>
<td>Weakly sustainable</td>
</tr>
<tr>
<td>0</td>
<td>No impact</td>
</tr>
<tr>
<td>-1</td>
<td>Unsustainable</td>
</tr>
<tr>
<td>-2</td>
<td>Strongly unsustainable</td>
</tr>
<tr>
<td>?</td>
<td>Uncertain</td>
</tr>
<tr>
<td>Preferred Option</td>
<td>Sustainability Objectives</td>
</tr>
<tr>
<td>----------------------------------------</td>
<td>--------------------------</td>
</tr>
<tr>
<td></td>
<td>Biodiversity</td>
</tr>
<tr>
<td>1: South Yard Enclave</td>
<td>1</td>
</tr>
<tr>
<td>2: MoD Mount Wise</td>
<td>1</td>
</tr>
<tr>
<td>3: The South Yard Heritage Area</td>
<td>1</td>
</tr>
<tr>
<td>4: Marlborough Street</td>
<td>0</td>
</tr>
<tr>
<td>5: Devonport Conservation Area</td>
<td>0</td>
</tr>
<tr>
<td>6: The “Green” Arc</td>
<td>2</td>
</tr>
<tr>
<td>7: North of Granby Green</td>
<td>?</td>
</tr>
<tr>
<td>8: The Bull Ring, at Duke St, Monument St, Kerr St and 1001-200 Ker St</td>
<td>?</td>
</tr>
<tr>
<td>9: Devonport Guildhall</td>
<td>2</td>
</tr>
<tr>
<td>11: Transport</td>
<td>1</td>
</tr>
<tr>
<td>12: Redevelopment at Mount St and Ker St</td>
<td>?</td>
</tr>
<tr>
<td>14: Mount Wise primary school</td>
<td>?</td>
</tr>
<tr>
<td>15: Marlborough St primary school</td>
<td>?</td>
</tr>
</tbody>
</table>
Appraisal of New Proposals

2.7. There are three new Proposals/Policies introduced in the Submission Draft that were not included in the Preferred Options Report. An SA of these proposals is included in Table 3 below:

<table>
<thead>
<tr>
<th>Preferred Option</th>
<th>Sustainability Objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Biodiversity</td>
</tr>
<tr>
<td>DP11: New Primary School</td>
<td>0  ?  ?</td>
</tr>
<tr>
<td>DP12: Dental Training School</td>
<td>0</td>
</tr>
<tr>
<td>DP16: Devonport Park</td>
<td>1</td>
</tr>
</tbody>
</table>

Proposal DP11: New Primary School

2.8. **Strengths:** The proposal has a positive impact on energy use in that it replaces two energy inefficient schools with one new state of the art energy efficient school building. It also has a positive effect on the economy of the Devonport area in that it creates an attractive new school which should attract people to live in the area. There is also a link between better education and health and wellbeing. The proposal also benefits leisure by allowing better on site sports facilities for pupils and promoting use of leisure facilities out of school times. It is also considered to have a positive impact on basic needs and equality as it will improve education in a deprived area.

2.9. **Weaknesses:** The proposal involves the construction of a new school on Greenfield land, joining together two schools formerly on previously developed land. This does not represent the best use of previously developed land. The location of the new school is also less central than the other sites and may mean an increase in car journeys, increasing pollution and contributing to climate change. However, in this case, the benefits of the new school to education and to the regeneration of Devonport are considered to outweigh the costs to the environment. The choice of the site is based on a feasibility study. A further weakness is the potential impact on the cultural heritage of Brickfields, which is noted for archaeological significance.
2.10. **Timescales:** Short term (2008 – 2009)

2.11. **Likelihoods:** High

2.12. **Recommendations:** None. The plan ensures that impact on the local distinctiveness and cultural heritage is minimised and opportunities for interpretation are explored. It also provides for a Green Travel Plan.

**Proposal DP 12: Dental Training School / GP Surgery**

2.13. **Strengths:** The proposal is considered to have a positive impact on the economy of the area, increasing prestige, and creating new jobs. It is also located next to a High Quality Public Transport route, encouraging use of public transport. It would have a direct positive effect on health and the basic needs of the area.

2.14. **Timescales:** Short term (2008-2009)

2.15. **Likelihoods:** High

2.16. **Weaknesses:** There is uncertainty about the proposal’s impact on a landscape feature as well as the site’s distinctiveness and cultural heritage. It also involves the loss of Greenfield land, and therefore doesn’t make the best use of previously developed land. However, the benefits to regeneration of Devonport are considered to outweigh the costs to the environment.

2.17. **Recommendations:** None. The Plan ensures that impact on biodiversity (landscape feature) and cultural heritage is minimised.

**Proposal DP16: Devonport Park**

2.18. **Strengths:** The proposal’s strengths lie in protecting and promoting biodiversity, promoting healthy lifestyles, democracy (community management), as well as positive links to regeneration and economy and tackling crime through lighting.

2.19. **Weaknesses:** None identified.

2.20. **Timescales:** 2008 onwards

2.21. **Likelihoods:** Medium

2.22. **Recommendations:** No recommendations.
Appraisal of the Submission Version

2.23. The following paragraphs provide a summary of the findings of the SEA/SA Submission Version Devonport Area Action Plan focusing on Proposal DP01 to DP15.
Proposal DP 01: South Yard Enclave (July 2005 Appraisal)

Option 1: South Yard Enclave

2.24. **Strengths:** The development proposal for this site is a positive opportunity to link communities and provide a focus for the local community in terms of services and facilities respecting local characteristics. The mixed use development offers a diverse range of services and facilities which will turn have a positive effect on local employment opportunities, local needs and enhance communities’ quality of life, overcoming issues associated with high levels of unemployment and health deprivation. It should encourage a more vibrant and varied socio economic profile. The proposal should have a positive impact on reconnecting communities currently severed through improved footpath/cycle routes.

2.25. **Weaknesses:** It is uncertain from the proposal whether the proportion of open space to built development is sufficient and meets Government guidelines. Short term impacts from noise and air pollution will be generated during the construction phase. In addition it is uncertain whether there is contaminated land on site. Apart from considering a reduction in energy consumption it is important that the proposal reflects the overarching principles relating to the conservation water, reuse materials and source materials locally. It is unclear from the proposal what level of parking provision will be made available and the relationship of the development to key public transport routes.

2.26. **Timescale:** Medium to long term (over the next 10-20 years) due to the time taken for development briefs to be prepared, proposals to come forward and construction to occur.

2.27. **Likelihood:** High

2.28. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** A clearly defined development brief needs to reflect the principles referred in the AAP. A detailed assessment will need to be undertaken to determine whether any of the MoD land is contaminated. A full assessment needs to be undertaken of the public transport network.

2.29. Opportunities should be explored to employ the local labour force by incorporating skills/training programmes to improve the skills base and overcome long term unemployment levels.

Proposal DP 01: Devonport: South Yard Enclave

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

**Nature of revisions to the Preferred Option 1 –**

The main changes to the proposal since Preferred Options include the omission of the proposed primary school, and further requirements for: a transport network and
transport interchange, environmental improvements and traffic management, design codes, promotion of area’s heritage and archaeology, and assessment of contaminated land.

The issues raised by the SEA of the Preferred Options have been largely met in the following proposals and policies: DP1.12 (contaminated land), DP1.3 (Transport network), CS20 (Resource Use), CS04.9 (local labour), CS18.3 & CS30 (open space provision), CS28.4 and Car Parking Strategy (Parking).

Actual standards for open space will be set in the emerging Greenspace and Parks Strategy, which is referred to in the supporting text of the Core Strategy. There are also proposals in the Devonport AAP to improve access to Devonport Park and the ‘Green Arc’ as well as proposals for open space.

Noise and air pollution during construction – covered by other legislation and planning condition.

A masterplan for the site has been prepared as part of the planning application, meeting the SEA recommendation for a brief to be prepared. CS02 and the reference to Design Codes (DP01.8) are also considered to be sufficient.

Sourcing of materials is not explicitly referred to, although it can be considered as part of Policy CS34.1. There will also be a section on Sustainable construction including sourcing of local materials in the forthcoming Design SPD.

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

No additional comments.

**Recommendations:**

Include provision for sourcing of local materials in Design SPD
Proposal DP 02: North of Granby Green

Option 7 – North of Granby Green

2.30. **Strengths:** Proposals to demolish and redevelop the area will result in improvements to the quality of housing stock, generate a mix of housing for all, ensure some provision is made for affordable housing, including some that meet lifetime housing standards and supporting the reuse of previously developed land. The proposal should improve connectivity within the housing estate and link to adjacent communities as well as enhancing the public realm and improving people’s quality of life and well being.

2.31. **Weaknesses:** Potential negative impacts could result from the development’s proximity to the A374 with the possible need for noise attenuation, and mitigation against noise and air pollution during construction. In addition, it is uncertain whether the proposal will meet Government guidelines on proximity to greenspace, adequately reduce car parking provision and create the necessary drive for the reuse of construction materials on site. The lower density in housing will result in the displacement of some communities and it is uncertain what provision has been made to accommodate people elsewhere as a temporary measure or to encourage permanent relocation to other parts of the City?

2.32. **Timescale:** Short to medium term (over the next 5-15 years) due to the time taken for negotiations to be completed and relocations to take place.

2.33. **Likelihood:** High

2.34. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** Clear development principles are required, incorporating high quality design and use of sustainable design and construction techniques to accompany development briefs for this area of the city, including:

- seeking to reduce energy consumption
- design out crime
- encourage the reuse of construction and demolition of waste materials in new development
- the sourcing of local materials
- reduce water consumption
- minimise waste through the provision of recycling facilities
- reduce car parking provision

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Proposal DP 02: North of Granby Green

a) Submission Version Revisions to the SEA/SA

**Nature of revisions to the Preferred Option 7 – North Granby**

The overall proposal is the same although it is now recognised the redevelopment could be ‘part of a mixed use scheme’. Specific figures for affordable housing are also given. Other additions include provisions for commercial development at ground floor level on
Granby frontage and the omission of public art (which is now part of policy CS33 in the Core Strategy).

All the SEA issues raised at Preferred Options are largely met in the following policies: DP02.5 (noise attenuation measures) CS02 (Design), CS20 and CS34.1 (Resource Use), CS32 (crime), CS26 (recycling), CS18 and CS30 (open space provisions).

The SA recommendation for displaced residents to be housed is covered by the Devonport Objective 2 (4).

Actual standards for open space will be set in the emerging Greenspace and Parks Strategy, which is referred to in the supporting text of Core Strategy. There are also proposals in the Devonport AAP to improve access to Devonport Park and the ‘Green Arc’ as well as proposals for open space.

Noise and air pollution during construction – covered by other legislation and planning condition.

Sourcing of local materials and re-use of demolished waste in construction to be included in the forthcoming Sustainable Construction section of the Design SPD.

<table>
<thead>
<tr>
<th>b) Revised SEA/SA Assessment:</th>
</tr>
</thead>
<tbody>
<tr>
<td>No further comments.</td>
</tr>
</tbody>
</table>

**Recommendations:**

Include provision for sourcing of local materials in Design SPD

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Proposal DP 03: The Bull Ring, at Duke Street, Monument Street, Kerr Street and 1001-20 Kerr Street

**Option 8 – The Bull Ring, at Duke Street, Monument Street, Kerr Street and 1001-20 Kerr Street**

2.35. **Strengths:** Proposals to demolish and redevelop the area will result in an improved quality of housing stock, generate a mix of housing for all, ensure provision is made for affordable housing, provide for some dwellings meet lifetime housing standards and support the reuse of previously developed land. The proposal should result in improvements to the public realm, people’s quality of life and well being.

2.36. **Weaknesses:** Potential negative impacts could result from noise and air pollution during construction. In addition it is uncertain whether the proposal will meet Government guidelines on proximity to greenspace, seek to reduce car parking provision and create the necessary drive for the reuse of construction materials on site. The lower density in housing will result in the displacement of some communities and it is uncertain what provision has been made to accommodate people elsewhere as a temporary measure or to encourage permanent relocation to other parts of the City? The proposals should also seek to ensure that existing rights of way are not severed through the proposed development.
2.37. **Timescale:** Short to medium term (over the next 5-15 years) due to the time taken for negotiations to be completed and relocations to take place.

2.38. **Likelihood:** High

2.39. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** Clear development principles are required, incorporating high quality design and use of sustainable design and construction techniques to accompany development briefs for this area of the city, including:

- seeking to reduce energy consumption
- design out crime
- encourage the reuse of construction and demolition of waste materials in new development
- the sourcing of local materials
- reduce water consumption
- minimise waste through the provision of recycling facilities
- reduce car parking provision
- ensure existing rights of way are not severed through development

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**Proposal NP 03: The Bull Ring, at Duke Street, Monument Street, Kerr Street and 1001-20 Kerr Street**

**a) Submission Version Revisions to the SEA/SA**

**Nature of revisions to the Preferred Option 8 – The Bull Ring**

There are minor changes to the proposal. It is now specified that it can be part of a mixed use scheme rather than residential alone. Public art provision is omitted but included in the Core Strategy (CS33). New provision for protection of rights of way through the development is included.

All issues raised by the SA are largely addressed in the following proposals and policies: DP03.4 (protecting existing rights of way), CS20 and CS34.1 (Resource Use), CS26 (Waste), and CS32 (crime), CS18.3 & CS30 (open space provision), CS28.4 (parking) and Council’s Parking Strategy.

The SA recommendation for displaced residents to be housed is covered by the Devonport Objective 2 (4).

Actual standards for open space will be set in the emerging Greenspace and Parks Strategy, which is referred to in the supporting text of Core Strategy. There are also proposals in the Devonport AAP to improve access to Devonport Park and the ‘Green Arc’ as well as proposals for open space.

Noise and air pollution during construction – covered by other legislation and planning condition.

Sourcing of local materials and re-use of demolished waste in construction to be included in the forthcoming Sustainable Construction section of the Design SPD.

Clear design principles are covered by CS02 and the forthcoming Design SPD as well as
design issues identified in the Sustainable Neighbourhood Study and Characterisation Study.

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<tr>
<th>b) Revised SEA/SA Assessment:</th>
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<td>No further comments.</td>
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**Recommendations:**

Ensure that future Design SPD includes sourcing local materials.
Proposal DP 04: Redevelopment of Mount Street and Kerr Street (July 2005)

Option 12 – Redevelopment of Mount Street and Kerr Street

2.40. **Strengths:** Proposals to demolish and redevelop the area will result in higher quality housing stock, generate a mix of housing for all, ensure some provision is made for affordable housing, some meeting lifetime housing standards and supporting the reuse of previously developed land. The proposal should result in improvements to the public realm, people’s quality of life and well being.

2.41. **Weaknesses:** Potential negative impacts could result from noise and air pollution during construction. In addition it is uncertain whether the proposal will meet Government guidelines on proximity to greenspace, seek to reduce car parking provision and drive for the reuse of construction materials on site. The lower density in housing will result in the displacement of some communities and it is uncertain what provision has been made to accommodate people elsewhere as a temporary measure or to encourage permanent relocation to other parts of the City? Proposals should seek to ensure that existing rights of way are not severed through the proposed development and new connections to existing communities are created.

2.42. **Timescale:** Short to medium term (over the next 5-15 years) depending on relocations to take place.

2.43. **Likelihood:** High

2.44. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** Clear development principles are required, incorporating high quality design and use of sustainable design and construction techniques to accompany development briefs for this area of the city, including:
   - seeking to reduce energy consumption
   - design out crime
   - encourage the reuse of construction and demolition of waste materials in new development
   - the sourcing of local materials
   - reduce water consumption
   - minimise waste through the provision of recycling facilities
   - reduce car parking provision

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Proposal DP 04: Redevelopment of Mount Street and Kerr Street

a) Submission Draft Revisions to the SEA/SA

**Nature of revisions to the Preferred Option 12 – Mount Street and Ker Street**

The proposals is essentially the same, but with further requirements for elements of mixed use development, protection of rights of way, respect for setting of Guildhall and planting of trees along Ker Street and George Street frontages. Public art requirement is
omitted but included in the Core Strategy (CS33).

The SEA issues are largely addressed in the following proposals and policies: CS20 and CS34.1 (Resource Use), CS18.3 & CS30 (open space), CS28.4 and the Council’s Parking Strategy (CS28.4), and CS32 (crime).

The SA recommendation for displaced residents to be housed is covered by the Devonport Objective 2 (4).

Actual standards for open space will be set in the emerging Greenspace and Parks Strategy, which is referred to in the supporting text of Core Strategy. There are also proposals in the Devonport AAP to improve access to Devonport Park and the ‘Green Arc’ as well as proposals for open space.

Noise and air pollution during construction – covered by other legislation and planning condition.

Sourcing of local materials and re-use of demolished waste in construction to be included in the forthcoming Sustainable Construction section of the Design SPD.

Clear design principles are covered by CS02 and the forthcoming Design SPD as well as design issues identified in the Sustainable Neighbourhood Study and Characterisation Study.

b) Revised SEA/SA Assessment:

No further comments.

Recommendations:

Ensure that Design SPD includes section on sourcing of local materials.
Proposal DP 05: Curtis / Duke Street
Option 13 – Curtis / Duke Street

2.45. **Strengths:** Proposals to demolish and redevelop the area will result in improvements to the quality of housing stock, generate a mix of housing for all, ensure some provision is made for affordable housing, some meeting lifetime housing standards and supporting the reuse of previously developed land. The proposal should result in improvements to the public realm, people’s quality of life and well being.

2.46. **Weaknesses:** Potential negative impacts could result from noise and air pollution during construction. In addition it is uncertain whether the proposal will meet Government guidelines on proximity to greenspace, seek to reduce car parking provision and drive for the reuse of construction materials on site. The lower density in housing will result in the displacement of some communities and it is uncertain what provision has been made to accommodate people elsewhere as a temporary measure or to encourage permanent relocation to other parts of the City? Proposals should seek to ensure that existing rights of way are not severed through the proposed development and new connections to existing communities are created.

2.47. **Timescale:** Short to medium term (over the next 5-15 years) depending on relocations to take place.

2.48. **Likelihood:** High

2.49. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** Clear development principles are required, incorporating high quality design and use of sustainable design and construction techniques to accompany development briefs for this area of the city, including:

- seeking to reduce energy consumption
- design out crime
- encourage the reuse of construction and demolition of waste materials in new development
- the sourcing of local materials
- reduce water consumption
- minimise waste through the provision of recycling facilities
- reduce car parking provision

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**Proposal DP 05: Curtis Street / Duke Street**

a) **Submission Draft Revisions to the SEA/SA**

**Nature of revisions to Preferred Option 13 – Curtis Street / Duke Street**

The overall policy is the same, although there are changes in wording and structure. Public art requirement is omitted, but now included in the Core Strategy under policy CS33. Percentages of affordable housing are replaced by actual figures. Requirement for protection of public rights of way is added.
The issues raised by the SEA are largely met by the following proposals or policies: CS20 (Resource Use), CS28 (Parking), CS18 & CS30 (open space provision), CS32 (crime), and CS02 (Design).

The SA recommendation for displaced residents to be housed is covered by the Devonport Objective 2 (4).

Actual standards for open space will be set in the emerging Greenspace and Parks Strategy, which is referred to in the supporting text of Core Strategy. There are also proposals in the Devonport AAP to improve access to Devonport Park and the ‘Green Arc’ as well as proposals for open space.

Noise and air pollution during construction – covered by other legislation and planning condition.

Sourcing of local materials and re-use of demolished waste in construction to be included in the forthcoming Sustainable Construction section of the Design SPD.

Clear design principles are covered by CS02 and the forthcoming Design SPD as well as design issues identified in the Sustainable Neighbourhood Study and Characterisation Study. A brief is not considered necessary due to the size of the proposal (20 dwellings). Lack of a brief is not considered to be at odds with sustainable development, however it is potentially helpful.

b) Revised SEA/SA Assessment:

**Recommendations:**

Ensure that the Design SPD covers sourcing of local materials.

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**Proposal DP 06: MOD Mount Wise (July 2005)**

**Option 2 – MoD Mount Wise**

2.50. **Strength:** MoD Mount Wise has a number of proposals that strongly support sustainability objectives and seeks to protect significant archaeological interest on the site, generate strong visual links to the waterfront and retain formal sports facilities. The proposal seeks to provide a percentage of affordable housing and reduce energy consumption for some housing stock.

2.51. **Weaknesses:** Negative effects are associated with short term impacts on air quality, noise and neighbouring communities’ quality of life during construction. Issues which need to be addressed include achieving a high quality of design which whilst enabling public access overcomes concerns over crime levels and anti social behaviour. In addition the development needs to provide a range of housing stock and types. Opportunities should be explored to encourage a reduction in waste going to landfill through the provision of recycling facilities and water conservation. Where possible materials should be sourced locally, including from on site.

2.52. **Timescale:** Medium to long term (over the next 15-20 years) due to the time taken for a comprehensive development brief to be prepared.
2.53. **Likelihood:** Medium to high.

2.54. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** A clear development brief should be prepared incorporating high quality design and the design and use of sustainable design and construction techniques. It should seek to:

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

Opportunities should be explored to employ the local labour force incorporating skills/training programmes to improve the skills base and overcome long term unemployment levels.

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**Proposal DP06: MOD Mount Wise**

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

**Nature of revisions to the Preferred Option 2 – MOD Mount Wise**

The proposal remains essentially the same. The number of dwellings has been increased to 250. Changes since Preferred Options include further provisions for: health, educational or training facilities; a transport network and interchange; public realm improvements to George St approach to Mount Wise Park; restoration of historic surfaces; assessment of flood risks; and reconnection to waterfront.

All issues raised by the Preferred Options SA are largely addressed in the following: CS2.5 and CS2.11 (enabling public access), CS32 (crime), DP06 (mixed house types), CS26.2 (recycling), CS20 & CS34 (Resource Use), and CS04.9 (local labour).

Actual standards for open space will be set in the emerging Greenspace and Parks Strategy, which is referred to in the supporting text of Core Strategy. There are also proposals in the Devonport AAP to improve access to Devonport Park and the ‘Green Arc’ as well as proposals for open space.

Noise and air pollution during construction – covered by other legislation and planning condition.

Sourcing of local materials and re-use of demolished waste in construction to be included in the forthcoming Sustainable Construction section of the Design SPD.

Clear design principles are covered by CS02, DP06.7 (design codes), DP07.19 (views) and the forthcoming Design SPD as well as design issues identified in the Sustainable Neighbourhood Study and Characterisation Study.
b) Revised SEA/SA Assessment:

No further comments.

Recommendations:

Ensure that Design SPD includes sourcing of local materials.
Proposal DP 07: Mount Wise Primary School

Option 14 – Mount Wise Primary School

2.55. **Strengths:** Proposals to demolish Mount Wise primary school and redevelop the area will result in improvements to the quality of housing stock, generate a mix of housing for all, ensure some provision is made for affordable housing, some meeting lifetime housing standards and supporting the reuse of previously developed land.

2.56. **Weaknesses:** Potential negative impacts are associated with noise and air pollution during construction. In addition it is uncertain whether the proposal will meet Government guidelines on proximity to greenspace, seek to reduce car parking provision and drive for the reuse of construction materials on site. In addition, it is uncertain whether alternative school provision will be available.

2.57. **Timescale:** Short to medium term (over the next 5-15 years) due to the time taken for negotiations to be completed with landowners and relocations to take place.

2.58. **Likelihood:** High

2.59. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** Clear development principles are required, incorporating high quality design and use of sustainable design and construction techniques to accompany development briefs for this area of the city, including:
- seeking to reduce energy consumption
- design out crime
- encourage the reuse of construction and demolition of waste materials in new development
- the sourcing of local materials
- reduce water consumption
- minimise waste through the provision of recycling facilities
- reduce car parking provision

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Proposal DP 07: Mount Wise Primary School

a) Submission Draft Revisions to the SEA/SA

**Nature of revisions to the Preferred Option 14 Mount St Primary School**

The proposal is essentially the same but more succinct. Requirement for public art is omitted but included in the Core Strategy (policy CS33). The number of dwellings has been increased to 40.

All issues raised by the Preferred Options SEA have been largely addressed in the following policies: CS20 (Resource Use), CS32 (crime), CS26 (waste), CS 18 and CS30 (Open space provision), and CS02 (Design).

Actual standards for open space will be set in the emerging Greenspace and Parks Strategy, which is referred to in the supporting text of Core Strategy. There are also proposals in the Devonport AAP to improve access to Devonport Park and the ‘Green
Arc’ as well as proposals for open space.
Noise and air pollution during construction – covered by other legislation and planning condition.

Sourcing of local materials and re-use of demolished waste in construction to be included in the forthcoming Sustainable Construction section of the Design SPD.

Clear design principles are covered by CS02, DP06.7 and the forthcoming Design SPD as well as design issues identified in the Sustainable Neighbourhood Study and Characterisation Study.

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

No further comments.

**Recommendations:**

Ensure that the Design SPD includes a section on sourcing of local materials.

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**Proposal DP 08: Marlborough Primary School**

**Option 15 – Marlborough Primary School**

2.60. **Strengths:** Proposals to demolish Marlborough primary school and redevelop the area will result in improvements to the quality of housing stock, generate a mix of housing for all, ensure that there is some provision made for affordable housing, and some meeting lifetime housing standards as well as supporting the reuse of previously developed land.

2.61. **Weaknesses:** Potential negative impacts are associated with noise and air pollution during construction. In addition it is uncertain whether the proposal will meet Government guidelines on proximity to greenspace, seek to reduce car parking provision and drive for the reuse of construction materials on site. In addition, it is uncertain whether alternative school provision will be available.

2.62. **Timescale:** Short to medium term (over the next 5-15 years) due to the time taken for negotiations to be completed with landowners and relocations to take place.

2.63. **Likelihood:** High

2.64. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** Clear development principles are required, incorporating high quality design and use of sustainable design and construction techniques to accompany development briefs for this area of the city, including:

- seeking to reduce energy consumption
- design out crime
• encourage the reuse of construction and demolition of waste materials in new development
• the sourcing of local materials
• reduce water consumption
• minimise waste through the provision of recycling facilities
• reduce car parking provision

Proposal DP 08: Marlborough Primary School

a) Submission Draft Revisions to the SEA/SA

Nature of revisions to the Preferred Option 15:

The proposal is the same except for omission of the requirement for public art, which is now included in Core Strategy policy CS33.

All SEA issues have been largely addressed in the following policies: CS20 (Resource Use), CS32 (crime), CS26 (waste), CS26.4 and the Council’s Parking Strategy (parking), CS 18 and CS30 (Open space provision), and CS02 (Design).

Para. 5.38 states that the proposal is dependent on finding an alternative site, thus addressing one of the issues highlighted by the SEA.

Noise and air pollution is covered by other legislation and conditions attached to planning decision notices.

A development brief is not considered necessary due to the scale of the proposed development, however policy CS02 and the forthcoming Design SPD is considered sufficient.

b) Revised SEA/SA Assessment:

No further comments.

Recommendations:

Include provision for sourcing of local materials in Design SPD
Proposal DP 09: Richmond Walk

Option 10 – Richmond Walk

2.65. **Strengths:** Proposals to encourage mixed use development should generate a mix of housing for all, ensure provision is made for affordable housing, provide for some dwellings to meet lifetime housing standards and support the reuse of previously developed land where available. The proposal should result in improvements to the public realm, people’s quality of life and well being.

2.66. **Weaknesses:** Potential negative impacts could result from noise and air pollution during construction. In addition it is uncertain whether the proposal will meet Government guidelines on proximity to greenspace, seek to reduce car parking provision and seek to reuse construction materials on site. Proposals should be sensitive to existing employment land and ensure that any conflict of use is avoided e.g. noise, delivery times etc impacting on residents quality of life. Proposals should seek to ensure that existing rights of way are not severed through the proposed development. There is some level of uncertainty whether new high quality waterfront development will encourage the purchase of dwellings as second homes and drive up house prices in this area. In addition, care needs to be taken to ensure that any development proposals are sensitive to potential risks of flooding resulting from rising sea levels.

2.67. **Timescale:** Short to medium term (over the next 5-15 years) due to the time taken for negotiations to be completed.

2.68. **Likelihood:** High.

2.69. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** Clear development principles are required, incorporating high quality design and use of sustainable design and construction techniques to accompany development briefs for this area of the city, including:
- seeking to reduce energy consumption
- design out crime
- encourage the reuse of construction and demolition of waste materials in new development
- the sourcing of local materials
- reduce water consumption
- minimise waste through the provision of recycling facilities
- reduce car parking provision
Proposal DP09 Richmond Walk -

a) Submission Version Revisions to the SEA/SA

Nature of revisions to the Preferred Option 10 – Richmond Walk

The main proposal is the same, but with extra provisions for: protection of rights of way, assessment of flood risk, protection of historic elements, improved connections to Mount Wise and improved pedestrian access to waters edge.

All SEA issues are largely addressed in the following policies: DPO9.3 (Flooding), CS20 (Resource Use), CS32 (Design and Crime), CS28 (parking) and Council’s Parking Strategy, CS02 (Design), CS26 (Minimising waste), and CS18/CS30 (open space).

Para. 6.4 ensures that non-employment development must not prejudice the needs of existing employment uses.

Noise and air pollution during construction is covered by other legislation and planning condition.

Policy CS15 ensure that development with at least 15 dwellings must provide a proportion (30% of total no. of dwellings) of affordable housing, thus providing some protection from second homes. The remaining dwellings will be at market value.

Sourcing of local materials to be covered as part of Sustainable Construction part of the Design SPD.

b) Revised SEA/SA Assessment:

No further comments.

Recommendations:

Include provision for sourcing of local materials in Design SPD

Proposal NP 10: Devonport Guild Hall

Option 9 – Devonport Guild Hall

2.70. **Strengths:** This proposal will support local needs, encourage community participation and cohesion, improve access to cultural facilities, enhance the quality of infrastructure and public realm and support opportunities to access learning facilities for all levels.

2.71. **Weaknesses:** It is uncertain from this proposal whether restoration work can seek to reduce energy and water consumption and minimise waste generation.

2.72. **Timescale:** Short to medium term (over the next 5-15 years) due to the time taken for negotiations to be completed with landowners and relocations to take place.
2.73. **Likelihood:** High.

2.74. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** Restoration work on the building should explore opportunities to reduce energy and water consumption.

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**DP10 Devonport Guildhall**

a) **Submission Draft Revisions to the SEA/SA**

**Nature of revisions to the Preferred Option 9 – Devonport Guildhall**

The proposal is essentially the same as the preferred options.

The SEA raised one issue about exploring opportunities to reduce water and energy consumption. This is met by policy CS20 (Resource use) provided that the restoration constitutes development and is subject to planning permission. However if planning permission is not required, policy CS20 does not have any force.

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

No further comments.

**Recommendations:**

No further recommendations.

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**Proposal DP13 Marlborough Street (July 2005)**

**Option 4 – Marlborough Street**

2.75. **Strengths:** The proposal to generate a mixed use street will have a positive impact in terms of improving access to services and facilities, making efficient use of existing buildings and infrastructure and generating a greater diversity of employment opportunities covering retail and office use.

2.76. **Weaknesses:** The proposals need to ensure that where appropriate locally distinct features are reflected in any new building/restoration work, improvements are made to existing stock to be suitable for 21st century living and negative impacts associated with noise and air pollution are mitigated during construction. All new development should seek to reduce energy and water consumption and minimise waste generated to landfill. Where possible, construction materials should be sourced locally and include the recycling of materials on site. A potential negative effect could be uncertainty over the viability of specialist retail uses. In addition, it is unclear from the proposal whether car parking will be provided for residential areas, whether this will be on street or elsewhere and whether this will have an impact on traffic movements.
2.77. **Timescale:** Short to medium term (over the next 5-10 years) due to the time taken for negotiations to be completed with landowners and relocations to take place.

2.78. **Likelihood:** Medium.

2.79. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** The impact of changes on specialist uses should be closely monitored to ensure that as a consequence of the changes their economic vitality is maintained.

### Proposal DP 13: Marlborough Street

**a) Submission Version Revisions to the SEA/SA (September 2006)**

**Nature of revisions to the Preferred Option 4 – Marlborough Street**

The overall policy remains the same but with the following provisions added: retention of local convenience retail; better links with the new centre; promotion of creative and cultural sector industries; upper floors brought back into use; retention of locally distinct features.

All issues raised by the SEA are largely addressed in the following policies: DP13.5 (protecting distinctive features); CS26.2 (for measures to reduce waste to landfill in new development); CS20 (tackling energy and water consumption); CS26 (reducing waste to landfill); and CS28 (Parking) & Council’s Parking Strategy.

Other issues raised by the Preferred Options SEA were improvements to existing stock and impact on specialist retail units. The proposal is considered to benefit the existing stock by being less restrictive on land uses in the street, thus encouraging mixed use development. This will in turn encourage inward investment which should bring investment in improving the existing stock. Impact on retail units is covered by para. 7.25. Noise and air pollution during construction is covered by other planning legislation. Sourcing of local materials is covered by policy CS20 (Resource Use), CS34.1 and the forthcoming Design SPD.

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

No further comments.

**Recommendations:**

Include provision for sourcing of local materials in Design SPD

### Proposal DP 14: Sustainable Transport (July 2005)

**Option 11 - Transport**

2.80. **Strengths:** The proposal is generally compatible with the sustainability objectives in seeking to avoid severance of existing communities by the creation of improved
linkages and minimising potential impacts to communities’ health through improvements in air quality to a reduction in the amount of through traffic.

2.81. **Weaknesses:** None identified. It is uncertain whether proposals will be sensitive to achieving a high quality environment and result in improvements to the public realm.

2.82. **Timescale:** Medium to long term (over the next 10-20 years) due to the time taken for development briefs to be prepared, proposals to come forward and construction to occur.

2.83. **Likelihood:** Medium to high

2.84. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** Future improvements and traffic management measures should seek to improve the quality of the public realm through high quality design.

### Proposal DP 14: Transport

**a) Submission Version Revisions to the SEA/SA**

**Nature of revisions to the Preferred Option 11 – Transport**

There are many changes to the submitted version of the proposal on Transport. New measures include: incremental improvements to A374, provision of Home Zones in new development, protecting rights of way, various measures for promoting walking and cycling, enhancing access to the waterfront, and measures for clearly marking the strategic transport network.

Only one issue was raised by the SEA about the need for transport measures to improve the public realm. This is met by policy CS02 which covers transport measures provided they constitute development. Good quality design is also implied by a ‘High Quality Public Transport’ route. There also references to connectivity and promoting a safe environment for pedestrians and cyclists, which relates to design.

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

No further comments

**Recommendations:**

No further recommendations.

### Proposal DP 15: The “Green Arc”

**Option 6 – The “Green Arc”**

2.85. **Strengths:** Measures to improve and integrate green spaces will have a positive effect on the landscape, enhance people’s sense of well being and promote healthier lifestyles. In addition proposals to improve surveillance, provide cycle links and
undertake associated highway safety works will reduce fear of crime and enhance human safety.

2.86. **Weaknesses:** None identified.

2.87. **Timescale:** Medium to long term (over the next 15-20 years).

2.88. **Likelihood:** Medium to high.

2.89. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** None identified

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<th>Proposal DP 15: The “Green Arc”</th>
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<tr>
<td><strong>Submission Version Revisions to the SEA/SA (September 2006)</strong></td>
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<tr>
<td><strong>Nature of revisions to the Preferred Option 12 – Potential long term development:</strong></td>
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<tr>
<td>The proposal is the same except for further details about what the development of the Green Arc should deliver, including: improvements to Devonport Park, improved access to the waterfront, and improved pedestrian and cycle links.</td>
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<tr>
<td>No weaknesses – no issues to address.</td>
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<th><strong>b) Revised SEA/SA Assessment:</strong></th>
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Conclusions and Recommendations

2.90. Substantial revisions have been made to the Devonport AAP Submission Version (September 2006) including a number of improvements designed specifically to mitigate potential adverse effects noted by the SEA/SA of the Preferred Options AAP and the SEA/SA of the Core Strategy Submission Version. The results of the SEA/SA indicate that the AAP has largely addressed the recommendations of the previous SEA/SA and therefore broadly conforms to the Sustainability Objectives.
3. MONITORING FRAMEWORK

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

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

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

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

3.4. SA monitoring should involve measuring indicators which enable a causal link to be established between implementation of the LDF and the likely significant effect being monitored. Potential indicators have been proposed in the Scoping Report for each of the SA/SEA sub-objectives, drawing from existing sources of indicators in order to ensure recording of data for the indicator is already established (at the District, Regional or National level). Additional indicators have been suggested by consultees in their responses to the Scoping Report consultation and these have been included in the revised table of proposed indicators for monitoring the effects of the SA/SEA (Table A3.1 in Appendix 3). These should be used as a basis for developing the SA monitoring framework as it may not be necessary or appropriate to collect data for all of the indicators.

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

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

**Suggested monitoring regime for the Plymouth SEAs**

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

*European Commission (2003)*

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