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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) LDF. It constitutes the Draft SEA Environmental Report and SA of the Submission Version of the Millbay & Stonehouse 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 policies and proposals for 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 Millbay & Stonehouse 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 Millbay & Stonehouse (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 Millbay & Stonehouse 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)).

1.5. For the record, the July 2006 findings of SEA/SA comments on the Core Strategy references to Millbay & Stonehouse AAP are repeated below for ease of reference.
This section has been developed since the June 2005 document extending the context and describing some of the key issues which need to be addressed in the LDF informed by recent studies relating to the Stonehouse and West Hoe Study and the Millbay Action Plan as well as Stonehouse Area Plan, Millbay Regeneration Plan and Community Planning Studies. It also includes a set of principles which have fed onto the Area Vision Statement in the Submission Draft Area Vision. This has been expanded since the June 2005 edition, preferred option 27 to:

- create vibrant, well connected unique neighbours;
- create a quality and vibrant Union Street;
- promote positive mixed use regeneration of disused and under-used sites, including tall buildings;
- create a stunning and high quality waterfront;
- create an attractive, vibrant and convenient link;
- positive connections that are safe and convenient and well served by public transport;
- capitalise on the historic assets;
- provide a mix of uses in the area;
- provide a new office quarter; and
- encourage new Marine based employment that capitalise on its location.

The revised section also emphasises where the focus of implementation will lie. The supporting text to Vision 2 also points to the area’s vulnerability to long-term tidal flooding identified in the Strategic Flood Risk Assessment.

The supporting text to this Vision acknowledges that the Strategic Flood risk Assessment identifies certain areas within Millbay and Stonehouse as vulnerable to long-term tidal flooding. While flooding is addressed in policies elsewhere in the Core Strategy document, it is uncertain as to the implications of this for development at this site, and no specific restrictions or mitigations are proposed. Developments at risk from long-term flooding in this area should be subject to specific flood risk assessment and incorporate the necessary specification for mitigation at the design stage.

The Current Report

1.6. 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 Millbay & Stonehouse Area Action Plan. The SEA/SA process has run concurrently with plan making and the authority of the local development framework have carefully considered the observations and recommendations of the SEA team in revising successive drafts of the AAP. The current report itself has been through a staged process, involving a commentary on the preliminary officers’ draft and then the preparation of this report.
1.7. 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 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

1.8. The SEA/SA and Submission Version of the Millbay & Stonehouse 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 Millbay & Stonehouse Area Action Plan with any revisions or amendments specified by the inspector.

Method of Approach in Updating the SEA/SA

1.9. The previous SEA/SAs for the Millbay & Stonehouse 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 Draft (September 2006)

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

3. Examine the changes made to the Preferred Options in the preparation of the Millbay & Stonehouse 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

1.10. This report concentrates on the sustainability and the potential environmental impacts of policies, plans and proposals as they are set out in the Submission Version. 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 Version. The third section discusses the findings of the Submission Version Millbay & Stonehouse Area Action Plan SEA/SA. The overall conclusions and recommendations are set out at the end of this section.

Appraisal of the Preferred Options for the AAP

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

Reviewing the SA Objectives against the Preferred Option Principles

2.3. The SEA/SA of the Preferred Options for Millbay & Stonehouse Area Action Plan takes its 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 included:

- In developing preferred options it will be important to ensure that the character of both Stonehouse and Millbay is not lost, including the area’s importance for its military heritage, the dockside working environment and key landmark features many of which are in need of restoration.
- Achieve high quality design which adheres to sustainable development principles. The design and construction of buildings should seek to reduce energy and water consumption, source materials locally and use where possible secondary materials.
- Proposals should seek to ensure that existing communities are not driven out by compulsory purchase orders and that they are not “outpriced” of the housing market; a range of housing stock and type needs to be made available.
- The preferred options need to ensure that if existing employment is displaced, businesses do not suffer.
- Achieving an attractive, vibrant environment should rejuvenate the area and result in increased employment opportunities, however the type of industries on offer, late night opening and the potential for associated anti social behaviour will have to be carefully balanced against the quality of life within the local community.
- Proposals should seek to support local employment opportunities during construction and implementation.
<table>
<thead>
<tr>
<th>SA Objectives</th>
<th>Millbay Principles</th>
</tr>
</thead>
<tbody>
<tr>
<td>BIODIVERSITY – Biodiversity and landscape are properly valued, conserved and enhanced</td>
<td>A network of clearly identifiable neighbourhoods, each with their own unique character and local centre</td>
</tr>
<tr>
<td>POLLUTION – Pollution is limited to levels which do not damage natural systems</td>
<td>A vibrant Union street that lives up to its past, stitching together Millbay and Stonehouse and providing a quality urban street linking the suburbs within the City Centre</td>
</tr>
<tr>
<td>CLIMATE CHANGE – Emissions contributing to climate change are reduced and adaptation measures are in place</td>
<td>A stunning high quality contemporary waterfront, with good quality and well maintained buildings, positive streetscape and well defined and accessible open spaces</td>
</tr>
<tr>
<td>RESOURCES – Demands on natural resources are managed so that they are used as efficiently as possible</td>
<td>An attractive and convenient link between Millbay and the City Centre</td>
</tr>
<tr>
<td>ENERGY – Efficient use of energy</td>
<td>A neighbourhood that is well connected to its surroundings with safe and attractive pedestrian routes and served by frequent and reliable public transport services</td>
</tr>
<tr>
<td>WASTE – Waste is minimised and, wherever possible, eliminated</td>
<td>A neighbourhood with a connected network of streets</td>
</tr>
<tr>
<td>ECONOMY – A diverse and thriving economy</td>
<td>A neighbourhood with a distinctive identify together with positive city landmarks</td>
</tr>
<tr>
<td>WORK AND INCOMES – Everyone has access to satisfying and fairly paid work and unpaid work is valued</td>
<td>A safe and attractive environment, which makes the most of its natural and historic assets and has a strong sense of community and provides appropriate community facilities</td>
</tr>
<tr>
<td>LOCAL NEEDS – Wherever possible, local needs are met locally so support local economies</td>
<td>A mixed use area with employment opportunities, local services, quality housing and attractive places to socialise</td>
</tr>
<tr>
<td>HEALTH &amp; WELL-BEING – Promoting everyone’s physical and mental wellbeing</td>
<td></td>
</tr>
<tr>
<td>LEARNING – Everyone has access to lifelong learning, training opportunities, skills and knowledge</td>
<td></td>
</tr>
<tr>
<td>SAFETY – Everyone is able to live without fear of crime or persecution</td>
<td></td>
</tr>
<tr>
<td>DISTINCTIVENESS AND CULTURAL HERITAGE – Diversity and local distinctiveness and cultural heritage are valued, protected and celebrated</td>
<td></td>
</tr>
<tr>
<td>LEISURE – Opportunities for culture, leisure and recreation are provided widely</td>
<td></td>
</tr>
<tr>
<td>TRANSPORT AND ACCESS – Offering inclusive access to all service, including access for those without a car</td>
<td></td>
</tr>
<tr>
<td>BASIC NEEDS, EQUALITY AND DIVERSITY – Ensuring community cohesion, tolerance, understanding and equality of opportunity</td>
<td></td>
</tr>
<tr>
<td>DEMOCRACY – All sections of the community are empowered to participate in decision making</td>
<td></td>
</tr>
</tbody>
</table>
Appraisal of each Preferred Option

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>
</tbody>
</table>
## Table 2: SA of Preferred Options

<table>
<thead>
<tr>
<th>Preferred Option</th>
<th>Sustainability Objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Biodiversity</td>
</tr>
<tr>
<td>1: Boulevard link to the City Centre from Millbay</td>
<td>1</td>
</tr>
<tr>
<td>2: Trinity Pier</td>
<td>?</td>
</tr>
<tr>
<td>3: New Primary School</td>
<td>?</td>
</tr>
<tr>
<td>4: Marine Sciences and Technology and marine related employment</td>
<td>1</td>
</tr>
<tr>
<td>5: Arena</td>
<td>1</td>
</tr>
<tr>
<td>6: East Quay</td>
<td>1</td>
</tr>
<tr>
<td>7: Reinvigoration of Union Street</td>
<td>1</td>
</tr>
<tr>
<td>8: Stonehouse Creek Site (School)</td>
<td>1</td>
</tr>
<tr>
<td>9: The Place Theatre</td>
<td>1</td>
</tr>
<tr>
<td>10: Royal William Yard</td>
<td>1</td>
</tr>
<tr>
<td>11: The Grain Silo</td>
<td>1</td>
</tr>
<tr>
<td>12: Harwell Street</td>
<td>1</td>
</tr>
<tr>
<td>13: Review of the Conservation</td>
<td>2</td>
</tr>
</tbody>
</table>

12
Appraisal of New Policies

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

<table>
<thead>
<tr>
<th>Proposal/Policy</th>
<th>Sustainability Objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Biodiversity</td>
</tr>
<tr>
<td>Proposal MS07: Millbay Marina</td>
<td>?</td>
</tr>
<tr>
<td>Policy MS12: Sustainable Transport</td>
<td>?</td>
</tr>
</tbody>
</table>

Proposal MS07: Millbay Marina

2.8. **Strengths:** The proposal will make good use of brownfield land, and improve public access to the waterfront. It will also support sustainability objectives seeking to protect local distinctiveness and cultural heritage. The proposal also addresses flood risk.

2.9. **Weaknesses:** Negative effects are associated with air and water pollution. Although the proposal states that a contribution to affordable housing will be made within the local area, provision should be made on-site. This proposal should seek to encourage sustainable construction techniques. Materials should be sourced locally and where possible be secondary materials. Minor negative effects associated with air and dust pollution will be generated during the construction phase.

2.10. **Timescale:** Short to medium term (over the next 5-15 years)
2.11. **Likelihood**: High.

2.12. **Recommendations for mitigation of adverse effects and/or enhance or positive effects**: Development proposals should consider sustainable design and construction techniques. It should seek to:
   - Design out crime
   - Reduce energy and water consumption
   - Minimise the impact on the aquatic environment

**Proposal MS12: Sustainable Transport**

2.13. **Strengths**: This proposal strongly supports sustainability objectives seeking to promote sustainable transport. It will improve access to the waterfront and links between Millbay and the city centre creating a sustainable linked community. It will make a positive contribution towards health and well-being, and also to addressing climate change.

2.14. **Weaknesses**: The impact on biodiversity is uncertain, particularly with regards to promoting water transport. As individual proposals are implemented, these impacts can be assessed and mitigated.

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

2.16. **Likelihood**: High

2.17. **Recommendations for mitigation of adverse effects and/or enhance or positive effects**: Development proposals should ensure impacts on biodiversity are minimised.

**Appraisal of the Submission Version**

2.18. The following paragraphs provide a summary of the findings of the SEA/SA Submission Version Millbay & Stonehouse Area Action Plan focusing on Policies/Proposals MS01 to MS12.

**Proposal MS01: Royal William Yard**

*Option 10 – Royal William Yard*

2.19. **Strengths**: This proposal strongly supports sustainability objectives seeking to protect local distinctiveness and cultural heritage as well as the reuse of the existing building. In addition this proposal could provide the opportunity to generate a diverse range of employment and job opportunities covering a range of income levels.

2.20. **Weaknesses**: There will be short term impacts associated with air and noise pollution. Although the proposal states that the yard should not become a “private, gated community” the interrelationship of public and private space will have to be carefully handled to ensure that concerns of crime and anti social behaviour are
overcome. Clarification is required on the quantity of parking provision per household.

2.21. **Timescale:** Short to medium term (over the next 5-15 years)

2.22. **Likelihood:** High.

2.23. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** Development proposals need to consider measures to minimise energy and water consumption, and encourage recycling whilst ensuring that proposals do not conflict with the integrity of the building. Proposals should seek to minimise the availability of car parking spaces and encourage alternative uses of transport.

---

**Proposal MS01: Royal William Yard**

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

**Nature of revisions to the Preferred Option 10 – Royal William Yard:** The Submission Version is broadly equivalent to the Preferred Option 10, although there is an additional reference to architectural mitigation. There is also an exception from the Core Strategy to provide 30 percent affordable housing. Reference is to the Core Strategy Policy CS28(5) on water transport. The concerns raised by the SEA of the Preferred Options report are largely addressed through specific policies in the Submission Version AAP and the Core Strategy: Policy CS02 Design; Policy CS03 Historic Environment; Policy CS20 Resource Use; Policy CS26 Sustainable Waste Management; Policy CS28 Local Transport Considerations. The remaining issues are outlined below:

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

**Housing:** The lack of affordable housing raises issues for social sustainability. However this is balanced by the restoration of buildings with historic value providing cultural sustainability.

**Recommendations:** No additional recommendations have been made.

---

**Policy MS02: The Grain Silo**

**Option 11 – The Grain Silo**

2.24. **Strengths:** The proposal recognises the structure as significant landmark feature, which forms an important part of the skyline and seeks to reuse an existing structure.

2.25. **Weaknesses:** It is uncertain from the proposal whether there will be any issues associated with contamination and water pollution associated with the structure. In addition, any proposal should seek to minimise carparking provision and explore opportunities to link to the public transport network or water transport service. In the design and implementation of new works, future proposals should seek to reduce water and energy consumption.
2.26. **Timescale:** Long term (over the next 15-20 years) due to the time taken to negotiate with MoD and ABP port operators, prepare a development brief, consider proposals and construction to occur.

2.27. **Likelihood:** Medium.

2.28. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** Development proposals need to consider measures to minimise energy and water consumption, and encourage recycling whilst ensuring that proposals do not conflict with the integrity of the building. Proposals should seek to minimise the availability of car parking spaces and encourage alternative uses of transport. A full risk assessment covering issues associated with land contamination and existing impacts of water quality need to be undertaken as well as the stability of the structure itself.

---

**Policy MS02: The Grain Silo**

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

**Nature of revisions to the Preferred Option 11 – The Grain Silo:** The point relating to public access now reads “where possible and practicable”, and the reference to parking is removed. Reference to a dive centre is removed from the main policy and included in the reasoned justification, which is expanded. The policy also states that any development should include a full risk assessment of land contamination and impacts on water quality. The concerns raised by the SEA of the Preferred Options report are largely addressed through specific policies in the Submission Version AAP and the Core Strategy: Policy CS02 Design; Policy CS03 Historic Environment; Policy CS20 Resource Use; Policy CS26 Sustainable Waste Management; Policy CS28 Local Transport Considerations.

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

No additional comments.

**Recommendations:**

No additional recommendations.

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**Proposal MS03: Land between Western Approach/Union Street and East Quay/Clyde Quay**

**Option 1- Boulevard link to the City Centre from Millbay**

2.29. **Strengths:** The Boulevard link includes proposals to improve the diversity of land uses, facilities and services, create a focus for the local community which will turn have a positive effect on local employment opportunities, landscape, cultural and historical environment, local needs and enhance communities’ quality of life. It provides an important link between two areas of Plymouth which are perceived through the road infrastructure and existing land uses to be disintegrated.
2.30. **Weaknesses:** The relocation of the Pavilion facilities to Central Park could have a negative impact on the local economy and the local labour force, however this is countered by the availability of new employment land and the retention of an arena/conference centre. Minor negative effects associated with air and dust pollution will be generated during the construction phase.

2.31. **Timescale:** Medium to long term (over the next 15-20 years) due to the time taken for development briefs to be prepared, proposals to come forward and construction to occur.

2.32. **Likelihood:** High – The proposal is critical to the MBM vision and urban renaissance agenda.

2.33. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** Clear development principles incorporating high quality design and the design and use sustainable design and construction techniques to accompany development briefs for this area of the city. It should seek to:
   - Design out crime
   - Encourage the reuse of construction and demolition of waste materials in new development
   - A reduction in energy and water consumption
   - Waste minimisation through storage of waste for recycling

**Option 3 – New Primary School**

2.34. **Strengths:** This proposal should have a positive effect on the attainment of higher educational qualifications both at a primary school level and for adult learning, it could act as an important focus for the local community through the provision of additional facilities and lies in close proximity of the main residential catchment areas and footpaths.

2.35. **Weaknesses:** It is assumed that the location of the new school will address concerns over two minute walk catchment areas. Minor negative effects associated with air and dust pollution will be generated during the construction phase.

2.36. **Timescale:** Medium to long term (over the next 15-20 years) due to the time taken for development briefs to be prepared, proposals to come forward and construction to occur and the availability of the site and section 106 contributions.

2.37. **Likelihood:** High.

2.38. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** Clear development principles incorporating high quality design and the design and use sustainable design and construction techniques to accompany development brief for the proposed school and adjacent infrastructure. It should seek to:
   - Encourage the reuse of construction and demolition of waste materials in new development
- A reduction in energy and water consumption
- Waste minimisation through storage of waste for recycling
- Reflect high quality design and enhance the streetscape frontage

**Option 5 – The Arena**

2.39. **Strengths:** This proposal should support the local economy and generate new employment opportunities, albeit slightly different to those offered through the Pavilion facilities.

2.40. **Weaknesses:** This proposal should seek to encourage sustainable construction techniques including the reuse of construction and demolition materials in place of primary resources and design of encourage environmental management practices including recycling facilities. In addition it should reflect high quality design and complement the waterfront skyline. The development should be sensitive to adjacent land uses and mitigate against impacts associated with late opening hours.

2.41. The proposal should seek to reduce car parking provision, encourage alternative modes of transport through the development of green travel plans and minimise against traffic congestion. Minor negative effects associated with air and dust pollution will be generated during the construction phase.

2.42. **Timescale:** Medium to long term (over the next 15-20 years) due to the time taken for development briefs to be prepared, proposals to come forward and construction to occur.

2.43. **Likelihood:** Medium to high.

2.44. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** Clear development principles incorporating high quality design and the design and use sustainable design and construction techniques to accompany development brief for the proposed school and adjacent infrastructure. It should seek to:

- Encourage the reuse of construction and demolition of waste materials in new development
- A reduction in energy and water consumption
- Waste minimisation through storage of waste for recycling
- Reflect high quality design and enhance the streetscape frontage

The proposal needs to consider alternative transport solutions to access the arena.

**Option 6 – East Quay**

2.45. **Strengths:** This proposal will have a positive effect on the surrounding landscape, skyline and public realm. It should encourage a diversification in employment and will create a mix of employment opportunities through retail, B1 and small workshops. Measures to enhance public access and promote water transport should enhance people’s sense of well being and promote healthier lifestyles.
2.46. **Weaknesses:** The proposal states that “there will be a range of mixed uses to give the area a vibrancy and activity at all times of the day”, care needs to be taken to ensure that the evening economy does not impact unreasonably on the quality of life of adjacent communities. The 25% target for affordable housing will clearly have important benefits in terms of alleviating local housing shortage, but this represents a minimum and every effort should be made to increase housing provision to meet local need. Future use of decontaminated sites must be carefully considered and measures taken to prevent water pollution. Minor negative effects associated with air and dust pollution will be generated during the construction phase.

2.47. **Timescale:** Medium to long term (over the next 15-20 years) due to the time taken for development briefs to be prepared, proposals to come forward and construction to occur.

2.48. **Likelihood:** Medium to high.

2.49. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** Opportunities should be explored through development brief to promote sustainable design, reducing energy and water consumption, reuse and sourcing of local materials. Local authorities through section 106 agreements should seek to ensure that at least 25% of affordable housing is achieved in order to achieve a mix of housing stock and type. Proposed land uses and subsequent changes in land use must be carefully monitored to ensure that cumulative impacts associated with late opening uses do not impinge on adjacent communities. Ensure through development proposals that local jobs are protected alongside the development of training schemes to enhance the local skills base.

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**Proposal MS03: Land between Western Approach/Union Street and East Quay/Clyde Quay**

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

**Nature of revisions to the Preferred Option 1: Boulevard link to the City Centre from Millbay, Preferred Option 3: New Primary School, Preferred Option 5: Arena, and Preferred Option 6: East Quay:** The Preferred Options are combined into one extensive policy, including sections on design and historic environment, residential mix, transport and public access, the Pavilions site, community facilities, contamination, employment, and phasing. The concerns raised by the SEA of the Preferred Options report are largely addressed through specific policies in the Submission Version AAP MS12 Sustainable Transport, and the Core Strategy: Policy CS02 Design; Policy CS04 Future Employment Provision; Policy CS13 Evening/Night-time Economy Uses; Policy CS20 Resource Use; Policy CS26 Sustainable Waste Management; Policy CS32 Designing Out Crime; Policy CS34 Planning Application Considerations. The remaining issues are outlined below:

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

**Flood Risk:** This is a major concern in the Millbay area, which needs to be addressed.

**Recommendations:** Recently submitted information on flood risk needs to be
Policy MS04: Bath Street

2.50. A Preferred Option was not prepared for this area; it was incorporated into Preferred Option 1– Boulevard Link to the City Centre from Millbay. The summary of the SEA/SA for Preferred Option 1 is included above.

Policy MS04: Bath Street

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

Nature of revisions to the Preferred Option 1– Boulevard Link to the City Centre from Millbay: Bath Street has been removed and is now included as a separate policy. The site will be safe guarded for the further development of Proposal MS03, which includes the Boulevard link. The policy requires mixed use development which is integrated with the Boulevard. The concerns raised by the SEA/SA of Preferred Option 1 are largely addressed through specific policies in the Submission Version and the Core Strategy: Policy CS02 Design; Policy CS20 Resource Use; Policy CS26 Sustainable Waste Management; Policy CS34 Planning Application Considerations. The remaining issues are outlined below:

b) Revised SEA/SA Assessment:

Flood Risk: This is a major concern in the Millbay area, which needs to be addressed.

Recommendations: Recently submitted information on flood risk needs to be reviewed and its implications considered.

Proposal MS05: Trinity Pier

Option 2 – Trinity Pier

2.51. **Strengths:** Trinity Pier includes proposals to improve the existing infrastructure and enhance the built environment both in terms of the public realm and buildings. The proposal will generate positive impacts on the built environment, reuse of existing structures and previously used land. Through enhancement works, the proposal should draw further investment, attract business and employment opportunities.

2.52. **Weaknesses:** Negative effects are associated with air and water pollution from a potential increase in shipping movements. Minor negative effects associated with air and dust pollution will be generated during the construction phase and there may be uncertainties associated with risks to aquatic habitats and species through increased shipping movements (although full impacts and mitigation measures will be considered through a detailed assessment of the marine environment).
2.53. **Timescale:** Medium to long term (over the next 15-20 years) due to the time taken for development briefs to be prepared, proposals to come forward and construction to occur.

2.54. **Likelihood:** High – Works have already been undertaken to facilitate access by the cross channel ferries.

2.55. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** Clear development principles incorporating high quality design and the design and use sustainable design and construction techniques to accompany development brief for the proposed terminal building and adjacent infrastructure. It should seek to:
   - Encourage the reuse of construction and demolition of waste materials in new development
   - A reduction in energy and water consumption.
   - Waste minimisation through storage of waste for recycling

2.56. Measures need to be put in place to ensure that water pollutants are filtered before reaching the Sound. The potential impact to local businesses needs to be reviewed and appropriate measures in place to compensate for any potential loss to their viability.

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### Proposal MS05: Trinity Pier

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

**Nature of revisions to the Preferred Option 2 – Trinity Pier:** Reference to impact assessment now reads “An environmental assessment outlining the possible impacts and considerations for the proposed landing stage, including location & design and methodology statement, and possible mitigation measures”.

A new reference to an appraisal of the archaeological and historic interest in the site is included, and also “safe and accessible routes to water transport”. The concerns raised by the SEA of the Preferred Options report are largely addressed through specific policies in the Submission Version AAP and the Core Strategy: Policy CS20 Resource Use; Policy CS22(2); Policy CS26 Sustainable Waste Management. The remaining issues are outlined below:

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

**Flood Risk:** This is a major concern in the Millbay area, which needs to be addressed.

**Recommendations:** Recently submitted information on flood risk needs to be reviewed and its implications considered.
Policy MS06: Inner Basin

Option 4 – Marine Science and Technology and marine related employment

2.57. **Strengths:** This proposal should have a positive effect on the local economy and generate employment opportunities during construction and implementation. In addition it could offer the potential for education at graduate/post graduate level through the development of the marine and technology centre. Minor negative effects associated with air and dust pollution will be generated during the construction phase.

2.58. **Weaknesses:** Proposals relating to boat building or other marine related employment such as Princes Yacht finishing plant need to ensure that adequate health and safety measures are in place to mitigate risks associated with air and water pollution, damage to aquatic habitats and associated species and potential impact on neighbouring land uses. This proposal should seek to encourage sustainable construction techniques including the reuse of construction and demolition materials in place of primary resources and design of encourage environmental management practices including recycling facilities. It is questionable as to whether potential employees will be local given the lower percentage of people within the community with degree qualifications and the provision of high income jobs.

2.59. **Timescale:** Medium to long term (over the next 15-20 years) due to the time taken for development briefs to be prepared, proposals to come forward, availability of the sites and construction to occur.

2.60. **Likelihood:** High.

2.61. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** Clear development principles incorporating high quality design and the design and use sustainable design and construction techniques to accompany development brief. It should seek to:

- Encourage the reuse of construction and demolition of waste materials in new development
- A reduction in energy and water consumption
- Waste minimisation through storage of waste for recycling
- Reflect high quality design and enhance the streetscape frontage
- Large development proposals should include green travel plans

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Proposal MS06: Inner Basin

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

**Nature of revisions to the Preferred Option 4 – Marine Sciences and Technology and marine related employment:** The policy now highlights the importance of using high quality materials, and also public access to the waterfront. Preservation of the historic importance of the area is also highlighted. The concerns raised by the SEA of the Preferred Options report are largely addressed through specific policies in the Submission Version AAP and the Core Strategy: Policy CS02 Design; Policy CS20 Resource Use; Policy CS26 Sustainable Waste Management; Policy CS28(2) Local
Transport Considerations; Policy CS34 Planning Application Considerations. The remaining issues are outlined below:

### b) Revised SEA/SA Assessment:

**Flood Risk:** This is a major concern in the Millbay area, which needs to be addressed. 

**Recommendations:** Recently submitted information on flood risk needs to be reviewed and its implications considered.

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**Policy MS08: Union Street**

**Option 7 – Reinvigoration of Union Street**

2.62. **Strengths:** The proposal should result in significant improvements to the urban frontages and streetscape generating strong visual links where possible with the remainder of the city founded on work through the Townscape Heritage Initiative and reflects local distinctiveness. In addition it will improve the quality of existing housing stock compatible with 21st century living which will have a positive effect on communities' health and well being. The proposal will encourage a diverse range of employment opportunities and should seek to overturn low employment rates.

2.63. **Weaknesses:** It is uncertain whether the proposal will have a beneficial effect on air pollution since Union Street forms one on the key vehicular routes through the City. This option should through sustainable construction techniques seek to reduce energy consumption through CHP, double glazing and insulation complying with Building Regulations. It should encourage sustainable construction techniques including the reuse of construction and demolition materials in place of primary resources and seek to minimise waste production. Although the proposal indicates that there will not be a net increase of night clubs, and further late night uses will be limited, care needs to be taken to ensure that such land uses are contained and future proposals are monitored to prevent cumulative impacts associated with anti social behaviour arising. Minor negative effects associated with air and dust pollution will be generated during the construction phase.

2.64. **Timescale:** Medium to long term (over the next 15-20 years) due to the time taken for development briefs to be prepared, proposals to come forward and construction to occur.

2.65. **Likelihood:** High

2.66. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** Work through the Townscape Heritage Initiative should provide the foundation for further investment within the location. The area would benefit from a coordinated design brief to achieve high quality design which will assist in instilling
greater planning certainty and investor confidence and generates high quality businesses premises. The brief should advocate the use of sustainable design and construction techniques to accompany development briefs for this area of the city. It should seek to:

- Design out crime
- Encourage the reuse of construction and demolition of waste materials in new development
- A reduction in energy and water consumption
- Waste minimisation through storage of waste for recycling

2.67. Opportunities for public participation through consultation on development briefs and future concept statements should be encouraged.

2.68. One of the overarching principles for this AAP seeks to allow on street car parking, a detailed assessment needs to be undertaken to determine whether this is appropriate on one the main arterial roads and result in traffic congestion.

<table>
<thead>
<tr>
<th>Policy MS08: Union Street</th>
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</thead>
<tbody>
<tr>
<td><strong>a) Submission Version Revisions to the SEA/SA (September 2006)</strong></td>
</tr>
<tr>
<td><strong>Nature of revisions to the Preferred Option 7 – Reinvigoration of Union Street:</strong> The main emphasis of the policy remains unchanged. The section on the Palace Theatre and Stonehouse Bridge (was Palace Theatre to Stonehouse Creek) now includes reference to a new primary school. An extra section is now included in the policy that covers Union Street as a whole with regards to historic conservation, character, providing off-street parking and improving connections between areas north and south of Union Street.</td>
</tr>
<tr>
<td>The concerns raised by the SEA of the Preferred Options report are largely addressed through specific policies in the Submission Version AAP and the Core Strategy: Policy CS20 Resource Use; Policy CS22 Pollution; Policy CS26 Sustainable Waste Management; Policy CS32 Designing Out Crime.</td>
</tr>
<tr>
<td>A design brief has not been prepared, however the Townscape Heritage Initiative, Union Street Conservation Area Appraisal and Management Plan, Stonehouse and Millbay Characterisation Study and Management Proposals should serve the same purpose. A great deal of public consultation was undertaken for the Townscape Heritage Initiative. The remaining issues are outlined below:</td>
</tr>
<tr>
<td><strong>b) Revised SEA/SA Assessment:</strong></td>
</tr>
<tr>
<td><strong>Flood Risk:</strong> This is a major concern in the Millbay area, which needs to be addressed.</td>
</tr>
<tr>
<td><strong>Recommendations:</strong> Recently submitted information on flood risk needs to be reviewed and its implications considered.</td>
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</tbody>
</table>
Policy MS09: Union Street corner with Western Approach

2.69. A Preferred Option was not prepared for this area; it was incorporated into Preferred Option 7- Reinvigoration of Union Street. The summary of the SEA/SA for Preferred Option 7 is included above.

<table>
<thead>
<tr>
<th>Policy MS09: Union Street corner with Western Approach</th>
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</thead>
<tbody>
<tr>
<td>a) Submission Version Revisions to the SEA/SA (September 2006)</td>
</tr>
<tr>
<td><strong>Nature of revisions to the Preferred Option 7- Reinvigoration of Union Street:</strong></td>
</tr>
<tr>
<td>The corner of Western Approach has been removed from Preferred Option 7 and included as a separate policy. The policy suggests mixed use development, but that replacement public parking spaces must be provided. The concerns raised by the SEA/SA of Preferred Option 7 are largely addressed through specific policies in the Submission Version and the Core Strategy as described above. The remaining issues are outlined below:</td>
</tr>
<tr>
<td><strong>b) Revised SEA/SA Assessment:</strong></td>
</tr>
<tr>
<td><strong>Parking:</strong> The requirement to replace public parking spaces does not support sustainable transport objectives. However it is supported by the city’s LTP2 and Parking Strategy.</td>
</tr>
<tr>
<td><strong>Flood Risk:</strong> This is a major concern in the Millbay area, which needs to be addressed.</td>
</tr>
<tr>
<td><strong>Recommendations:</strong> Recently submitted information on flood risk needs to be reviewed and its implications considered.</td>
</tr>
</tbody>
</table>

Policy MS10: Stonehouse Creek

Option 8 – Stonehouse Creek Site (School)

2.70. **Strengths:** Proposals strongly support the opportunity to increase the quality of education in the area and could support adult learning, training and community interaction. In addition school facilities could double up as outdoor leisure facilities for the neighbouring community if sensitively managed.

2.71. **Weaknesses:** It is important to ensure that adequate public transport services are provided and there are well lit, safe cycle routes and footpaths for children. The design of the building must reflect sustainable building standards and seek to reduce energy and water consumption and minimise waste generation. Materials should be sourced locally and where possible be secondary materials. Minor negative effects associated with air and dust pollution will be generated during the construction phase.
2.72. **Timescale:** Medium (15 years) due to the time taken for site to become available development brief to be prepared and construction to occur.

2.73. **Likelihood:** High.

2.74. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** Clear development principles incorporating high quality design and the use of sustainable design and construction techniques to accompany the development brief. It should seek to:
   - Encourage the reuse of construction and demolition of waste materials in new development
   - Reduce energy and water consumption
   - Waste minimisation through storage of waste for recycling

2.75. Appropriate infrastructure needs to be developed to ensure that there are alternative means of transport to school other than by car.

**Policy MS10: Stonehouse Creek**

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

**Nature of revisions to the Preferred Option 8 – Stonehouse Creek Site (School):** The policy now reads “Stonehouse Creek will be safeguarded for a new secondary school or for other educational purposes” rather than if needed. The policy includes clauses on minimising the loss of open space, providing positive and active frontages, improving public access to Union Street and Devonport, and including community facilities that will serve the whole neighbourhood.

The concerns raised by the SEA of the Preferred Options report are largely addressed through specific policies in the Submission Version AAP and the Core Strategy: Policy CS14 New Education Facilities; Policy CS20 Resource Use; Policy CS26 Sustainable Waste Management. The remaining issues are outlined below:

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

**Flood Risk:** This is a major concern in the Millbay area, which needs to be addressed.

**Recommendations:** Recently submitted information on flood risk needs to be reviewed and its implications considered.

**Proposal MS11: Stonehouse Arena**

**Option 12 – Harwell Street**

2.76. **Strengths:** The proposal strongly supports the opportunity to provide a variety of housing stock and types to meet all needs in addition to reflecting locally distinctive characteristics and enhancing the public realm. Through sensitive design crime levels and anti social behaviour should be minimised.
2.77. **Weaknesses:** Residential development should seek to reduce energy consumption and waste generation through the provision of recycling facilities. In addition the design of buildings should consider opportunities to source local materials thereby reducing vehicular trips and using where possible secondary aggregates. Proposals should be seeking to minimise car parking provision.

2.78. **Timescale:** Short to medium term (over the next 5-15 years)

2.79. **Likelihood:** High

2.80. **Recommendations for mitigation of adverse effects and/or enhance or positive effects:** Whilst 20% of housing is seeking to adhere to lifetime home standards covering energy consumption, design proposals should also seek to:

- Design out crime
- Encourage the reuse of construction and demolition of waste materials in new development
- Reduce water consumption
- Minimise waste through recycling facilities

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**Proposal MS11: Stonehouse Arena**

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

**Nature of revisions to the Preferred Option 12 – Harwell Street:** The Submission Version is broadly equivalent to the Preferred Option 12. The reference to the Harwell Street Planning and Design Brief has been removed, as has the reference to parking and access.

The concerns raised by the SEA of the Preferred Options report are largely addressed through specific policies in the Submission Version AAP and the Core Strategy: Policy CS20 Resource Use; Policy CS26 Sustainable Waste Management; Policy CS28 Local Transport Considerations; Policy CS32 Designing Out Crime.

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

No additional comments.

**Recommendations:**

No additional recommendations.
Conclusions and Recommendations

2.81. Substantial revisions have been made to the Millbay & Stonehouse 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 Draft. The results of the SEA/SA indicate that the AAP has largely addressed the recommendations of the previous SEA/SA and therefore broadly conforms to the Sustainability Objectives.

2.82. There is an ongoing need for data collection on flood risk, as this is a significant issue in the Millbay area. Recently submitted information needs to be analysed and any implications addressed through the outline Planning application for Millbay. Further information should also be considered as it becomes available.
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.