sutton harbour area action plan
sustainability appraisal
non-technical summary

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1 Introduction

Sustainability Appraisal Process

1.1 Planning Authorities are required to produce a Sustainability Appraisal (SA), alongside plans that form part of a Local Development Framework (LDF). The Sutton Harbour Area Action Plan (AAP) is such a plan.

1.2 Sustainability Appraisal uses a range of sustainability objectives and indicators to test whether the plans, policies and proposals are the best possible ones for delivering sustainable development. SA can be viewed as a yardstick against which the social, environmental and economic effects of the plan can be tested.

1.3 There were 3 key stages to the preparation of the Sutton Harbour AAP, and these comply with Government guidance contained within Planning Policy Statement 12:

- Issues and Options (published March 2005)
- Preferred Options (published November 2006)
- Submission (published October 2007)

1.4 Each of these stages has been subject to a Sustainability Appraisal. All of these appraisals have been undertaken using an appraisal framework developed and set out in the SEA/SA Context and Baseline report, which was developed during 2005 and published in July of that year. The appraisals were undertaken prior to publication at each stage, to enable any recommendations to be incorporated in the published versions. This non-technical Summary outlines the key sustainability findings associated with each of these stages and demonstrates how the Appraisal contributed to the development of the plan.

Sutton Harbour - The Context

1.5 Sutton Harbour is one of Plymouth’s most striking assets. It was Plymouth’s original commercial port and is still an active fishing port. With its attractive waterfront location and wealth of heritage, it is an important hub for leisure, international tourism and the local community.

1.6 The area includes three distinct quarters:

The Barbican: Steeped in maritime history, the Barbican is Plymouth’s historic core - an area characterised by intricate cobbled streets, limestone warehouses, shops, pubs and restaurants. It is an area of international importance and was Plymouth’s first Conservation Area. Its conservation and continued prosperity is vital for the city.

Bretonside: This includes the predominantly residential area north of Notte Street. Major new mixed-use development in the vicinity of Exeter Street, North Street and Bilbury Street- including residential, office, retail and hotel uses - is already contributing positively to Bretonside’s regeneration and the improvement of its local centre.
Coxside: Comprising a colourful mixture of uses, including established residential areas, the National Marine Aquarium, the fish market, Queen Anne’s Battery maritime uses, hotels and a mixture of employment uses, Coxside offers significant regeneration opportunities.

Objectives of the Area Action Plan

1.7 The vision for the Sutton Harbour AAP is:

*To consolidate and develop the Sutton Harbour area as an attractive and sustainable mixed-use city quarter creating a unique, high quality environment that will attract investment and new residents.*

1.8 In the year 2021, Sutton Harbour will be a vibrant, attractive and distinctive area where new high quality development complements enhanced historic areas. Established communities at Coxside, Bretonside and the Barbican will have been safeguarded and improved, with all residents enjoying benefits from the regeneration process in terms of better, conveniently located community facilities and amenities. Greater opportunities will exist to live, work, shop and socialise locally.

1.9 The proposals to deliver this vision are based on the following objectives:

- **Objective 1.** To promote the positive mixed-use regeneration of disused or under-used land and buildings.

- **Objective 2.** To conserve and enhance the special historic character of the Barbican, Bretonside and Coxside for future generations - capitalising on historic assets while respecting the character of existing communities, uses, buildings and structures that make the area distinctive.

- **Objective 3.** To create a safe, high-quality environment, that capitalises on the waterfront setting. This should include a linked network of attractive public spaces including a vibrant, publicly and visually accessible waterfront - enlivened with entertainment, leisure and cultural uses.

- **Objective 4.** To create and enhance neighbourhood centres for the Barbican, Bretonside and Coxside with local services, activities and amenities that meet the needs of local people, employees, businesses, visitors and the wider community.

- **Objective 5.** To create a high-quality mixed-use new urban village to the east and west of Sutton Road, Coxside including a mixture of housing types and tenures with a range of employment opportunities.

- **Objective 6.** To create an area that is easy to walk and cycle to and through - connecting effectively to surrounding neighbourhoods and the city centre, excellent access to public transport (including the proposed eastern corridor High Quality Public Transport link and improved water transport links).

1.10 The plan contains 11 proposals that provide for the following quantums of development:
• Housing - in the region of 1,890 units
• Affordable Housing - in the region of 567 units
• Lifetime Homes - in the region of 378 units
• Employment - in the region of 103,400sq m over 2.2 hectares
2 Results of SA - Issues and Options

2.1 A preliminary SA was undertaken for the Issues and Options document. This concluded that the proposals appeared broadly sustainable, although inevitably some conflict of interest may arise. These issues are raised through the following points:

- In enhancing the water front and increasing access opportunities care needs to be taken to ensure that flood defences remain intact.
- Achieving mixed use communities is a positive approach to future planning. However, while increasing residential and commercial uses it is important to ensure that the design of housing stock and dwelling units meets the needs of a 21st century community and that the design of buildings is sensitive to the surrounding built environment. This includes retaining locally distinctive features and seeking to minimise energy consumption and waste generation.
- Proposals to enhance streetscapes, gateways and expand the tourism potential are positive opportunities to reinforce Sutton Harbour’s status as an important waterfront location. However, impacts associated with late opening hours from leisure and entertainment facilities will have to be carefully handled to ensure that it does not impact on the quality of life of adjacent communities.
- Whilst proposals to reconfigure the Lock Bridge with the new bridge structure will have a positive effect in improving the connectivity between both sides of Sutton Harbour, careful consideration should be given to the potential impacts it may have on shipping movements in and out of the Harbour.
- Although proposals to create new access routes and improve connectivity should encourage more pedestrian and cycle movements and reduce the need for car use, consideration should be given as to how tourists access Sutton Harbour. Opportunities should be explored as to how to link into the public transport system by bus and water taxi.
- Opportunities to increase tourism to the area could increase following further environmental improvements, an increase in mixed use and a review of the role of the Citadel. However, careful consideration should be given to the capacity of the area to absorb visitor numbers and the potential disturbance of tourists on local communities.
3 Results of SA - Preferred Options

3.1 The results of the Preferred Options SA indicated that whilst the AAP was generally positive, there were some general issues and recommendations. These were:

- Throughout the phasing of development, it is important to ensure that the impacts on the existing community are mitigated through the provision of adequate services, facilities and infrastructure to meet all needs. Each development proposal and the AAP should not be considered in isolation. The LDF needs to recognise that depending on the timing of proposals, implementation and funding streams impacts may occur on adjacent land uses which need to be mitigated.

- A detailed assessment of educational need based on the future population figures for the area needs to be undertaken in order to determine whether additional facilities are required.

- Proposals need to respond to the Strategic Flood Risk Assessment

- Public transport infrastructure needs to be in place in advance of new development occurring. It is important not only to influence this modal shift through residential development but also through the decisions of major employers. All new large scale businesses should be required to submit green travel plans and commit some level of contribution/investment where development is not adjacent to the bus network to improve footpath and cycle route links. Public transport services must be frequent enough and widely available to encourage a modal switch in behaviour of residents, and to serve tourist needs.

- A Design Guide should be produced for all development on the re-use of construction and demolition materials on site, eg through planning conditions requiring developers to provide a demolition plan and covering the efficient water and energy use, reuse and sourcing of local materials as part of the sustainable construction and design guidance. Design proposals should consider opportunities to support renewable energy and sustainable urban drainage schemes. This commitment should not just be reflected in residential dwellings but also for large businesses through environmental management policies.

- Opportunities should be explored to prepare development proposals with waste management plans in place.
4 Results of SA - Submission

4.1 There were only minor changes to the Sutton Harbour AAP between the publication of the preferred options document and the draft of the submission document that was used for the appraisal. These changes do not significantly alter the sustainability of the plan as a whole, and generally the plan performs positively against the sustainability objectives.

4.2 The adoption of Plymouths LDF Core Strategy influenced this stage of the appraisal by providing greater clarity on the policy framework that underpins the proposals within the AAP. This led the appraisal team to conclude that some of the proposals have potential to deliver more favourable sustainability outcomes than at the time of Preferred Options publication, i.e. Affordable Housing, Renewable Energy. The appraisal also highlighted the potential to consider smaller business unit sizes as a mechanism to support local enterprise.

4.3 However, the loss of a proposal to create a new green space at Exchange Street car park was considered to be a retrograde step given the paucity of green space provision within this part of the city.

4.4 The majority of the SA of the submission document focused on interpreting the sustainability implications of evidence base material that has emerged since the publication of the preferred option. In relation to this, the appraisal made a number of key recommendations in relation to how the plan should respond to the following areas:

4.5 Flood Risk - the Level 2 SFRA significantly increases the understanding regarding the extent and severity of potential flood events around the harbour. It has highlighted the strategic importance of Sutton Lock as providing defence for the majority of the AAP area, and that there are significant concerns about weaknesses in the operational capacity of the lock gates causing an increasing likelihood of the them failing during a flood event. The SFRA's work on climate change scenarios shows that implications of this failure would be severe for many parts of Sutton Harbour. There is therefore a need for a co-ordinated approach to flood defence measures at a scale greater than individual development proposals. The appraisal makes recommendations against the allocation of vulnerable development, i.e. (residential) on the east side of the harbour and identifies the need for development to address issues around the capacity of the existing surface water drainage schemes.

4.6 Climate Change - The SA recognises that given the importance of sustainability objectives on energy, waste, resources and climate change that the plan should provide more certainty that these issues will be addressed (these issues frequently are scored as 'uncertain' in the SA matrix). The SA recommends that to ensure that climate change is appropriately considered that there is a requirement for larger proposals to submit a Climate Change & Sustainability Statement, that demonstrates commitment to how the development will perform in relation to the Code for Sustainable Homes & BREEAM standards, be designed to use less energy, incorporate the use of renewable's and decentralised/low carbon energy systems, incorporate adaptation measures to reflect forecasted changes in climate and flood risk; provide for sustainable urban drainage and waste management systems; and provide for sustainable transport. The scale, density and mixed use characteristics of the many of the proposals within
the AAP lend them to the consideration of Combined Heat & Power, or Tri generation (Combined Heat, Power & Cooling) as way of delivering low or zero carbon development. The proposals should include text that support the realisation of this potential.

4.7 Biodiversity - A Habitat Regulations Assessment has been completed for the AAP. This considers the impact of the AAP on the biodiversity found within sites of European importance for nature conservation. The HRA identifies the potentially significant adverse impacts of the Sutton Harbour AAP as coming from recreational disturbance at Plymouth Sound & Estuaries SAC & Tamar Estuaries Complex SPA. The HRA recommends that proposals that could generate this impact should be amended to include reference to the need to provide appropriate contributions towards managing off site recreational impacts within Plymouth Sound & Estuaries SAC and Tamar Estuaries SPA.
5 Conclusions

5.1 Over the course of the preparation of the Sutton Harbour AAP, the Sustainability Appraisal has helped to:

- Consider the risks of flooding and ensure appropriate mitigation measures are in place
- Take into account the growing body of guidance in relation to climate change which has evolved since the initial stages of the plan, and develop appropriate requirements to mitigate its effects, for example Climate Change & Sustainability Statements for larger proposals
- Highlighted the value of considering renewable energy options, such as Combined Heat & Power, as part of master planning for some of the Sutton Harbour major developments
- Ensure that biodiversity issues are appropriately considered, for example through reference to the need to provide appropriate contributions towards managing off site recreational impacts within Plymouth Sound & Esturaries SAC and Tamar Estuaries SPA
- Identify where changes to the plan could have a detrimental impact on sustainability, ie. the loss of a proposal to create a new green space