



Strategic Planning and Infrastructure Service,  
Plymouth City Council  
Ballard House  
West Hoe Road,  
Plymouth.  
PL1 3BJ

11 January 2024

Dear Sir/Madam,

### **Armada Way – Plymouth**

WSP has been commissioned to provide information to inform a request for a formal Environment Impact Assessment (EIA) Screening Opinion under Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) to determine whether the redevelopment of Armada Way constitutes 'EIA Development' (as defined in Regulation 2). The project will hereafter be referred to as the 'Proposed Development'. It should be noted that for the purposes of this screening assessment, we have assumed that the Armada Way trees remain, although it is understood that some of the trees earmarked for removal have already been removed on March 14<sup>th</sup>, 2023.

We acknowledge that the decision is a matter for Plymouth City Council (PCC) as the determining authority to confirm through their EIA Screening Opinion in consultation with others as to whether they consider the proposed form of development comprises 'EIA Development'.

This request for a Screening Opinion includes the following information to address the requirements of Regulation 6 (2) of the EIA Regulations:

- A plan sufficient to identify the land; (see **Figure 1**);
- A description of the Proposed Development, including in particular-
  - A description of the physical characteristics of the Proposed Development and, where relevant, of demolition works;
  - A description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;
- A description of the aspects of the environment likely to be significantly affected by the Proposed Development;
- To the extent that the information is available, a description of any likely significant effects of the Proposed Development on the environment resulting from:
  - The expected residues and emissions and the production of waste, where relevant;
  - The use of natural resources, in particular soil, land, water and biodiversity; and
  - Such other information or representations as the person making the request may wish to provide or make, including any features of the Proposed Developments or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment. See below and **Appendix A**.

Figure 1 – Site Plan



### THE SITE AND SURROUNDING AREA

The Site area is approximately 2.5ha located in the city centre of Plymouth. Within the development boundary is a linear urban public realm space dominated by paving and other hard surfacing with pockets and raised bed areas with trees and other vegetation planting. 109 tree features have been removed, although this assessment assumes they are still in place, since their removal is one of the Proposed Development's characteristics that are considered material in deciding as to the Scheme's qualification as EIA development. A sealed cobbled swale runs through the northern part of the Site boundary. The Site is bordered by the North Cross Roundabout to the north and Royal Parade to the south and is lined by commercial and retail development both to the east and west. The Site boundary also intersects Mayflower Street, Cornwall Street and New George Street. The Site location and boundary is illustrated in **Figure 1** above.

The nearest waterbody is the Plymouth Sound which is located 450m to the southeastern boundary of the Proposed Development. The Plymouth Sound and Estuaries Special Area of Conservation (SAC) is a European Designation (now National Network Site) located 750m south of the Proposed Development. The Plymouth Hoe West and East are designated Bathing Water sites located within the Plymouth Sound and Estuaries.

The Environment Agency's Flood Map for Planning shows that the entire Site is located within Flood Zone 1 which indicates a low probability of flooding.

The Plymouth Air Quality Management Area (AQMA) 2014 intersects the Site along Mayflower Street. There are no listed buildings or Scheduled Ancient Monuments (SAM) within the Site boundary although the Plymouth City Conservation Area impinges the Site between New George



Street and Royal Parade. Two Grade I listed buildings are located within 200m of the Site boundary, namely The St Andrews Church (170m southeast) and Prysten House (200m southeast). There are several Grade II listed buildings which are within 200m of the Site boundary, some of the closest ones include the 3, 5 and 7 Eton Place (100m northwest), the Guildhall including Great Hall, Assize Courts, and the Former City Treasure (110m southeast) and Council House and former Civic Centre (110m southwest). Two registered battlefields are in close proximity to the Site, The Civic square (200m south) and The Hoe (230m south). The Royal Citadel which is designated as a Scheduled Monument is located approximately 450m to the southeast of the Site.

## **NATURE AND PURPOSE OF THE PROPOSED DEVELOPMENT**

A general arrangement of the Proposed Development is shown in **Appendix B**. The aim of the Proposed Development is to improve the soft estate and urban infrastructure of Armada way, the city centre of Plymouth, with the Site having an area of approximately 2.5 ha.

The Proposed Development is part of an ongoing programme designed to address years of under-investment in city centre streets and spaces. As well as restoring the view to create a more impressive and grand welcome into the city centre, as part of the Proposed Development, new features will be created including :

- Soft Landscaping improvements;
- play and mixed use games areas for all ages;
- water-based play space including dancing fountain jets;
- bike parking throughout the Site including Sheffield stands and cycle hoops – a mobility hub will be going in at Mayflower Street and will be integrated into the Proposed Development;
- improved and centralised crossing at Mayflower Street to enhance north-south connectivity;
- improved café seating areas;
- attractive places to stop and rest for everyone;
- refurbished braille garden and new stepped amphitheatre space for smaller scale performance;
- new running water feature with sustainable drainage;
- installation of a defibrillator;
- new drinking water station;
- linear tree pits and re- paving at the Piazza; and
- refurbishing the sundial and its setting.

As part of the Proposed Development new drainage is proposed which will adopt sustainable drainage techniques as part of a wider strategic network in the city centre. The system includes rain gardens and swales which integrate the drainage system with the new planting to make the best use of surface water.

The estimated construction programme for the Proposed Development is approximately 18 months.

## **DETERMINING WHETHER THE DEVELOPMENT COMPRISES EIA DEVELOPMENT**

EIA is a process which brings together information about any likely significant environmental effects of a Proposed Development. It provides decision-makers and the public with the environmental information when determining applications for certain developments. EIA Development, as defined by the EIA Regulations, means development which is either Schedule 1 development (for which EIA



is mandatory) or Schedule 2 development which is likely to have significant effects on the environment by virtue of factors such as its nature, size or location.

The Proposed Development is not considered to be Schedule 1 development under the EIA Regulations. However, it could be considered Schedule 2 development, based on its footprint and development category (urban development projects), and on its potential to cause likely significant environmental effects. If a statutory EIA is required, then permitted development rights would be superseded and a planning application would need to be submitted for the Proposed Development.

Unless proven to be exempt by the Local Planning Authority, the Project is considered to fit under the definition of Schedule 2 development in Regulation 2(1):

*“Schedule 2 development means development, other than exempt development, of a description mentioned in column 1 of the table in Schedule 2 where—*

*(a) any part of that development is to be carried out in a sensitive area or*

*(b) any applicable threshold or criterion in the corresponding part of column 2 of that table is respectively exceeded or met in relation to that development”.*

Specifically, the Proposed Development could be interpreted to fall under Item 10(b) of Schedule 2;

*“Item 10(b) Urban development projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas;”*

and exceeds the criteria set in column 2 of the table, specifically criteria (i) outlined below as the Site area is 2.5ha.

*“(i) The development includes more than 1 hectare of urban development which is not dwellinghouse development; or*

*(ii) the development includes more than 150 dwellings; or*

*(iii) the overall area of the development exceeds 5 hectares.”*

We have set out in **Appendix A** an examination of the Proposed Development against the following criteria listed under Schedule 3 of the EIA Regulations (Regulation 5(4)):

- **Characteristics of development:** for example having regard to its size, use of natural resources, quantities of pollution, waste generated);
- **Location of development:** taking into account environmental sensitivity of geographical areas likely to be affected; and
- **Characteristics of the potential impact:** the potential significant effects in relation to items 1 and 2 above and having regard, in particular to the following: (e.g. its extent, magnitude, probability and duration and the possibility of effectively reducing the impact).

**Appendix A** replicates the EIA Screening Checklist<sup>1</sup> used by the Planning Inspectorate when screening for EIA. Local authorities may find that the checklist provides a useful foundation for screening for EIA. **Appendix C** presents Environmental Constraints Maps for the Project.

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<sup>1</sup> HM Government (2017). The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 Screening Matrix. Available online at:



## MITIGATION CONSIDERATIONS

As detailed in the National Planning Policy Framework (NPPF) 2023, “Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed”. Mitigation requirements for developments are also detailed within PCC’s Joint Local Plan Policies. Opportunities to avoid or reduce potential adverse effects, or to deliver environmental enhancements, may be identified even before the start of the EIA process, so long as there is a clear intent to implement them. Such opportunities have been considered as part of the design development, which has been informed by baseline survey work. We have therefore considered opportunities for mitigation of effects through this Screening process and added an additional column to the EIA Screening Checklist in **Appendix A** to confirm suggested/proposed mitigation if required.

The potential likely environment effects of the Proposed Development are presented in **Appendix A**, which adopts the established selection criteria for screening Schedule 2 development.

## ENVIRONMENTAL DESIGN CONSIDERATIONS

The main considerations around environment are likely to be in relation to the scale and nature of the Proposed Development which typically relates to the topics of Biodiversity, Landscape and Visual amenity, Cultural Heritage, Air Quality, Noise and Vibration, Water, Population and Health, and Climate Change. As a result, these have been thoroughly interrogated throughout the design process. It is important that the potential for impacts is appropriately tested by setting out the methodology for how they were assessed as part Design. Further detail on these is also provided in **Appendix A**.

## DETERMINATION

The main impacts from the Proposed Development are likely to occur during the construction stage. Construction will likely lead to impacts to receptors, including users of the city centre and other receptors as outlined in **Appendix A**. Most environmental effects caused by construction can be mitigated using standard environmental controls which have been outlined in a Construction Environmental Management Plan (CEMP), such as restrictions on working times, dust management plans, temporary drainage plans and noise complaint procedures.

The Proposed Development is unlikely to have any effects on any of the surrounding designated sites as outlined in the Site and Surrounding Area section above due to the nature and scale of the Proposed Development. Views from listed buildings will most likely be unaffected as the Site area is largely screened on either side from existing retails and commercial buildings, potential impacts on setting have been considered during the design process and has been designed to enhance the surrounding heritage assets and Plymouth City Conservation Area. Drainage changes from the Proposed Development are likely to improve any existing pathways to the Plymouth Sound and during construction standard construction mitigation should be adhered to and documented within a CEMP to ensure impact is reduced sufficiently.



Based on the **Appendix A** there is potential for adverse environmental effects due to the removal of trees, although these trees are not protected by Tree Protection Orders (TPO) and are not located in a conservation area. The loss of trees will likely lead to a short-term impact on habitats and biodiversity and visual amenity, however the Proposed Development aims to achieve a 20% Biodiversity Net Gain (BNG) as well as replanting lost habitat. This will ensure that overall, the Proposed Development will have a positive improvement on the existing Biodiversity on Site as demonstrated in the Soft Landscaping Proposals. An Arboricultural Method Statement will be produced which will outline measures to protect retained trees on site which includes one Category A tree, twenty-nine Category B trees, six Category C trees and three Category U trees. During operation the effect of the tree removal will persist until new planting establishes, this can be partially mitigated for by planting semi-mature species which has been committed to in the soft landscaping proposals. The effect of tree removal will be negated once new planting is established. Adverse effects which will be temporary in nature, lasting up to 25 years although the duration may decrease dependent on maturity of planted specimens and aftercare. On establishment the trees can be expected to offset the adverse effects, or to result in overall environmental gain, aiming for 20% and an increase in visual amenity. At this point, the effect will likely be a beneficial one to both biodiversity and more immediate ecology.

Based on the understanding of the design of the Proposed Development, it is not located in an environmentally “sensitive area” as defined by the EIA Regulations (Part 1 Regulation 2), and that any potential for likely significant adverse effects will be mitigated through measures as outlined in **Appendix A**. On this basis the Proposed Development is **not** considered to constitute EIA development.

In accordance with Regulation 6(6) Plymouth City Council has three weeks to adopt a Screening Opinion beginning from the date of the receipt of a request being made, or for a longer period, not exceeding 90 days from the date on which the person making the request submits the information required under paragraph (2) or (3) as may be agreed in writing with the person making the request. We would therefore be grateful for an acknowledgement of formal receipt of this Screening Request, together with notification of the expiry date of the statutory period.

An acknowledgement of formal receipt of this Screening Request, together with notification of the expiry date of the statutory period, would be gratefully received.

If you have any further queries, please do not hesitate to contact the undersigned.

Yours faithfully

Steffan Shageer MSc. BSc. MIEMA CEnv.  
Associate Director

OFFICIAL



## **Appendix A – EIA Screening Matrix**



Questions to be Considered	Likely / Unlikely	Is This Likely to Result in a Significant Effect?	Proposed Mitigation Measures, if Required
<b>1. Natural Resources</b>			
<p>1.1 Will construction, operation or decommissioning of the Proposed Development involve actions which will cause physical changes in the topography of the area?</p>	<p><b>Likely.</b> Redevelopment of the Site will result in changes to ground levels which may affect physical aspects of the surrounding area.</p> <p>The development of game areas, fountains, stepped amphitheatre and parking area could result in raising or lowering the land area which in turn might affect the topography of the area.</p>	<p><b>Unlikely.</b> Using best practice construction techniques, the potential effects of demolition and construction can be adequately managed and implemented via a Construction Environmental Management Plan (CEMP).</p> <p>The design of the Proposed Development will ensure that the topography ties into the surrounding area, specifically at the Site boundaries.</p> <p>Although there are changes to the ground levels, the changes will be small scale and are unlikely to be perceptible during operation of the Proposed Development. Therefore, there is no potential for a significant effect.</p>	<p>A CEMP has been prepared for the Proposed Development.</p> <p>Mitigation for the operational stage is inherent within the design of the structure.</p>
<p>1.2 Will construction or operation of the Proposed Development use natural resources above or below ground such as land, soil, water, materials/minerals or energy which are non-renewable or in short supply?</p>	<p><b>Likely.</b> Land, materials and energy will be required to construct and operate the Proposed Development.</p> <p>During operation, energy will be required to operate the amenities (water-based fountain and play space, mixed game areas, amphitheatre, streetlights) of the Proposed Development.</p>	<p><b>Unlikely.</b> As far as reasonably practical, sustainable materials will be utilised during the construction phase. No additional land-take is required for the Proposed Development.</p> <p>The construction phase will seek to minimise energy use through the implementation of best practice.</p>	<p>A CEMP has been prepared for the Proposed Development, this includes a sustainable management plan during construction.</p> <p>Mitigation for the operational stage will be inherent within the design of the structure and specification of materials.</p>





Questions to be Considered	Likely / Unlikely	Is This Likely to Result in a Significant Effect?	Proposed Mitigation Measures, if Required
		The design will consider sustainable energy use for the operation of the new infrastructure.	
<p>1.3 Are there any areas on/around the location which contain important, high quality or scarce resources which could be affected by the Proposed Development, e.g. forestry, agriculture, water/coastal, fisheries, minerals?</p>	<p><b>Unlikely.</b> The Site is not located within any designated site. The Proposed Development is the redevelopment of the existing Armada way and will not affect the surrounding resources. However, it should be noted that Plymouth Sound and Estuaries SAC is located 750m south of the Proposed Development.</p>	<p><b>Unlikely.</b> A Habitats Regulation Assessment (HRA) appropriate assessment has been undertaken to identify any likely significant effects on the Plymouth Sound and Estuaries SAC. There was potential for impacts on the SAC from construction run-off however a drainage plan was produced which outlined mitigation measure to be employed during construction and once implemented significant effects are unlikely.</p> <p>The improved drainage system Proposed as part of the Proposed Development will lead to an improvement in discharges to Plymouth Sound and Estuaries SAC. Therefore, there will be no potential significant adverse effects.</p>	<p>Morgan Sindall has prepared a Method Statement which once implemented, will avoid impacts on the Plymouth Sound and Estuaries SAC.</p>
<b>2. Waste</b>			
<p>2.1 Will the Proposed Development produce solid wastes during construction or operation or decommissioning?</p>	<p><b>Likely.</b> There will be production of inert waste associated with the construction of the Proposed Development.</p> <p>Although exact quantity of waste generation is not available, the construction waste could likely include concrete, debris, soil, metals, vegetation waste, paver blocks, drainage filters etc. It is also planned to reuse some of the existing materials from the Armada way</p>	<p><b>Unlikely.</b> Best practice waste management techniques will be adopted throughout the construction programme. The principles of the waste management hierarchy (i.e. reduce, reuse and recycle) will be adopted and the disposal waste will be appropriately treated.</p>	<p>A CEMP has been prepared for the Proposed Development which includes a waste management plan.</p>



Questions to be Considered	Likely / Unlikely	Is This Likely to Result in a Significant Effect?	Proposed Mitigation Measures, if Required
	<p>including the original granite kerbs and setts, to reduce the carbon footprint of hard surfacing which will further reduce the waste generation.</p> <p>Any wastes generated during operation phase will be disposed following waste hierarchy as per Waste Duty of care Code of Practice<sup>2</sup>.</p>	<p>Where practicable, materials will be prefabricated off-site to avoid excess construction waste.</p> <p>In addition, the estimated volume of disposal is not anticipated to be significant when accounting for the total amount of disposal waste generated within Plymouth.</p> <p>The design of the structure will take into consideration end of life and where practicable will be designed for future re-use.</p>	
<b>3. Pollution</b>			
<p>3.1 Will the Proposed Development release pollutants or any hazardous, toxic or noxious substances to air?</p>	<p><b>Unlikely.</b> The construction of the Proposed Development could result in releases of pollutants to the air such as dust emissions from construction, emissions from engines, plant, equipment and vehicles used for transportation of workers and material for construction.</p>	<p><b>Unlikely.</b> There will be increase in plant movements generated over the course of the construction stage. However, emissions of pollutants from vehicles / vessels are expected to be very limited and are unlikely to pose a risk to human health or affect the AQMA over a long term. There is potential for dust issues during construction phase, however these will be short term and limited to the construction stage.</p> <p>The Proposed Development is likely to have an overall positive effect on Air Quality of the city centre as it is focused on encouraging active methods of transport and will not introduce any traffic, however for the purposes of this assessment, there will be no change to baseline values as a result of operation. Therefore, no long-term</p>	<p>A CEMP has been prepared for the Proposed Development which outlines mitigation during construction in relation to dust and emissions.</p>

<sup>2</sup> [https://consult.defra.gov.uk/waste/consultation-household-waste-duty-of-care/supporting\\_documents/Updated%20Waste%20Duty%20of%20Care%20Code%20of%20Practice.pdf](https://consult.defra.gov.uk/waste/consultation-household-waste-duty-of-care/supporting_documents/Updated%20Waste%20Duty%20of%20Care%20Code%20of%20Practice.pdf)



	Questions to be Considered	Likely / Unlikely	Is This Likely to Result in a Significant Effect?	Proposed Mitigation Measures, if Required
			significant effects are likely to occur as a result of operation.	
3.2	Will the Proposed Development cause noise and vibration or release of light, heat, energy or electromagnetic radiation?	<p><b>Likely:</b> There is potential for noise and vibration impacts associated with the construction of the Proposed Development due to the use of plant, earthworks and vehicle movements.</p> <p>There is potential for operational noise associated with the fountain jets, game area and amphitheatre, however this will be infrequent and at a local level and is in keeping with noise already produced in the city centre.</p> <p>Light sources associated with the construction and operation of the Proposed Development have the potential to affect nearby sensitive receptors in particular retained trees.</p>	<p><b>Unlikely.</b> Noise and vibration reduction / mitigation measures will be outlined within the CEMP and implemented during the construction phase to minimise the potential effects of noise on nearby sensitive receptors.</p> <p>It is anticipated that fixed plant and commercial operations can be appropriately located and/or controlled to ensure compliance with appropriate noise level limits.</p> <p>Prior to mitigation there is potential lighting could cause an impact in relation to disturbance of nearby sensitive receptors in close proximity to the Proposed Development. Lighting installations as part of the Proposed Development will be designed to ensure minimal impact to nearby sensitive receptors. The CEMP will include details on best practice measures to minimise impacts during the construction phase.</p> <p>Operational lighting would be unlikely to cause significant environmental effects as the current baseline is well lit due to it being a city centre location.</p>	An CEMP has been prepared for the Proposed Development and noise controls are outlined within Morgan Sindall's Environmental Control Checklist. This includes noise and vibration mitigation measures as well as a complaints and communication strategy to reduce any potential impacts during construction.
3.3	Will the Proposed Development lead to risks of contamination of land or water from releases of pollutants onto the ground or into surface waters, groundwater, coastal waters or the sea?	<b>Unlikely.</b> There is the potential for release of contaminants during construction, which could introduce pathways to existing contamination or pose a risk through run-off.	<b>Unlikely.</b> It is anticipated that construction related risks such as the potential for physical contamination (i.e. sediment) in groundwater from surface water run-off would be mitigated through the use of	The CEMP details the best practice measures to mitigate the potential for contamination and pollution during construction works.



	Questions to be Considered	Likely / Unlikely	Is This Likely to Result in a Significant Effect?	Proposed Mitigation Measures, if Required
			<p>temporary drainage systems. Detailed mitigation measures would be contained within outline CEMP.</p> <p>It is not anticipated there would be any risks of contamination associated with the operational phase of the Proposed Development with SUD in place.</p>	
3.4	<p>Are there any areas on or around the location which are already subject to pollution or environmental damage, e.g. where existing legal environmental standards are exceeded, which could be affected by the Proposed Development?</p>	<p><b>Likely.</b> The Plymouth City Council Air Quality Annual Status Report for 2022 indicates that NO<sub>2</sub> levels have remained high in the city, exceeding the annual mean objective levels and as a result, new developments have the potential to further impact on air quality within the area. AQMA 1583 falls within the Proposed Development on Mayflower Street and is also located directly adjacent to the Proposed Development on the northern and southern side.</p> <p>There are no historical or authorised landfill sites within 500m of the Proposed Development. The Armada Way is developed and currently in operation, there will not be contamination issues associated with this.</p>	<p><b>Unlikely.</b> With suitable controls in place during construction significant effects are unlikely to arise.</p>	<p>A CEMP and a method Statement has been developed and best practice measures have been outlined to reduce any negative effects during construction associated with run-off, contamination, and pollution.</p>
<b>4. Population and Human Health</b>				
4.1	<p>Will there be any risk of major accidents (including those caused by climate change, in accordance with scientific knowledge) during construction, operation or decommissioning?</p>	<p><b>Unlikely.</b></p> <p>The Proposed Development is unlikely to increase risks of major accidents during the construction stage.</p>	<p><b>Unlikely.</b> Any risk of accident during construction will be controlled in accordance with health and safety legislation and good site management procedures. This is unlikely to lead to significant effects.</p>	<p>The CEMP would manage any potential risks to the environmental disasters and specify emergency measures in the instance of an environmental accident, such as spillages or fire.</p>



	Questions to be Considered	Likely / Unlikely	Is This Likely to Result in a Significant Effect?	Proposed Mitigation Measures, if Required
		<p>During the operational stage risks from major accidents will be minimised though design standards. For example, the new drainage system has been designed to account for climate change and infrastructure proposed has been chosen to be resilient to extremes in weather.</p>	<p>Through design standards, impacts from major accidents is unlikely to lead to an increase in significant effects, and proposed infrastructure is likely to be more resilient to climate change.</p>	
4.2	<p>Will the Proposed Development present a risk to the population (having regard to population density) and their human health during construction, operation or decommissioning? (for example, due to water contamination or air pollution)?</p>	<p><b>Unlikely.</b> The construction of the Proposed Development could result in releases of pollutants to the air such as dust emissions from construction, emissions from engines, plant, and material for construction.</p> <p>The construction site is located within a busy city centre and therefore there is an inherent health and safety risk to passers-by during construction.</p> <p>During operation no risk to human health is anticipated.</p>	<p><b>Unlikely.</b> To safeguard the public it is anticipated that standard controls and best practice will be developed for the construction period to manage any potential risks to the population and their human health.</p> <p>There may be an increase in emissions as a result of traffic / vessel movements during construction. However, emissions of pollutants from vehicles / vessels are expected to be very limited and are unlikely to pose a risk to human health.</p>	<p>A method statement showing controls for the safeguarding has been produced. Site hoarding is also proposed which will eliminate the potential for effects on the population and users of the city centre.</p>
<b>5. Water Resources</b>				
5.1	<p>Are there any water resources including surface waters, e.g. rivers, lakes/ponds, coastal or underground waters on or around the location which could be affected by the Proposed Development, particularly in terms of their volume and flood risk?</p>	<p><b>Unlikely.</b> The Site is not surrounded by any surface waterbody for 500m. However, Plymouth Sound and Estuaries is noted 750m south of the Proposed Development and is in Flood Zone 1.</p>	<p><b>Unlikely.</b> During construction, there is potential for impacts to the Plymouth Sounds however these can be controlled through standard mitigation measures and therefore it is unlikely that it will result in a significant effect.</p>	<p>A method statement showing controls for the safeguarding of the Plymouth Sound has been produced and accepted by Natural England.</p>



Questions to be Considered	Likely / Unlikely	Is This Likely to Result in a Significant Effect?	Proposed Mitigation Measures, if Required
		<p>The Proposed Development includes the development of a Sustainable Urban Drainage (SUDs) system that will form part of a wider strategic network in the city centre. This will lead to improved drainage and attenuation and could improve any discharge to the Plymouth Sound, therefore there is unlikely to be significant effects.</p>	
<b>6. Biodiversity (Species and Habitats)</b>			
<p>6.1 Are there any protected areas which are designated or classified for their terrestrial, avian and marine ecological value, or any non-designated / non-classified areas which are important or sensitive for reasons of their terrestrial, avian and marine ecological value, located on or around the location and which could be affected by the Proposed Development? (e.g. wetlands, watercourses or other waterbodies, the coastal zone, mountains, forests or woodlands, undesignated nature reserves or parks. (Where designated indicate level of designation (international, national, regional or local))).</p>	<p><b>Likely.</b> The Site is not located within any designated site. However, Plymouth Sound and Estuaries SAC is noted 750m south of the Proposed Development. There are four SSSIs noted within 2km and the closest being Plymouth Sound Shores and Cliffs SSSI which is 1.4km southeast of the Proposed Development. There are no priority habitats noted within 2km of the Proposed Development.</p> <p>Although they are undesignated the Site has 151 trees which have been surveyed and categorised following BS5837:2012. In total there is one Category A tree, 94 Category B trees, 45 Category C trees and 11 Category U trees on the Site. The Proposed Development includes the removal of the majority of these trees, with one Category A tree, twenty-nine Category B trees, six Category C trees and three Category U trees retained. Trees onsite will therefore be affected by the Proposed Development (for the purposes of this assessment we have assumed that the trees are still in-situ).</p>	<p><b>Likely.</b> Provided suitable controls are in place then no significant effects are likely on Plymouth Sound SAC or the SSSIs during construction and operation.</p> <p>The tree removal during construction is likely to lead to an adverse effect during construction, however the trees are undesignated, and their loss can be mitigated for by retention and safeguarding of existing trees.</p> <p>During operation the effect of the tree removal will persist until new planting establishes, this can be partially mitigated for by planting semi-mature species which are quick to establish. The effect of tree removal will be imperceptible when the new planting is established and may lead to improvements in the number of trees depending on the re-planting schedule. Therefore, there will likely be a temporary adverse effect which will be temporary in nature, which will then become a beneficial effect when the planting as part of the</p>	<p>A Stage 2 HRA Appropriate Assessment has been undertaken and a method statement showing controls for the safeguarding of the Plymouth Sound has been produced and accepted by Natural England.</p> <p>A CEMP has been prepared for the Proposed Development and has identified suitable controls and mitigation measures to limit the risk of impacts to habitats and species.</p> <p>The Proposed Development aims to achieve 20% Biodiversity Net Gain (BNG), and will be assessed in a BNG Assessment. This will ensure that overall, the scheme will have a positive improvement on the existing Biodiversity on site. The report also indicates the Soft Landscaping plan to show the replacements planting with semi-mature trees.</p> <p>An Arboricultural Method Statement is being produced which will outline measures to protect retained trees on</p>



	Questions to be Considered	Likely / Unlikely	Is This Likely to Result in a Significant Effect?	Proposed Mitigation Measures, if Required
			scheme is established which can take up to 25 years.	site which includes one Category A tree, twenty-nine Category B trees, six Category C trees and three Category U trees retained.
6.2	<p>Could any protected, important or sensitive species of flora or fauna which use areas on or around the site, e.g. for breeding, nesting, foraging, resting, over-wintering, or migration, be affected by the Proposed Development?</p>	<p><b>Likely.</b></p> <p>A Preliminary Ecological Appraisal has been completed and this was followed by a Bat Tree Roost Inspection which concluded that no bats were present on the Site. A new bat tree roost inspection will be undertaken prior to construction.</p> <p>Nesting Birds may occupy trees which are to be removed as part of the Proposed Development and they could therefore be impacted by the Proposed Development depending on timings.</p> <p>There are no waterbodies present within 500m that could provide suitable habitats for otters, Great Crested Newts or water voles.</p>	<p><b>Likely.</b> During construction there could be potential impacts on Nesting Birds. Tree removal should be scheduled outside the nesting season, to avoid potential impacts to nesting birds, where this is unavoidable the works should be undertaken under ecological supervision. Following best practice and established processes there should not be any significant effects on nesting birds.</p> <p>Once industry best practice is adhered to and suitable control implemented then there should be no significant effects on protected species during construction.</p> <p>Tree removal during construction is likely to lead to an adverse effect during construction, however the trees are undesignated, and their loss can be mitigated for by the retention and safeguarding of any retained trees.</p> <p>During operation the effect of the tree removal will persist until new planting establishes, this can be partially mitigated for by planting semi-mature species which are quick to establish. The effect of tree removal will be imperceptible and may lead to improved habitat when the new planting is established.</p>	<p>A Stage 2 HRA Appropriate Assessment has been undertaken and a method statement showing controls for the safeguarding of the Plymouth Sound has been produced and accepted by Natural England.</p> <p>A CEMP has been prepared for the Proposed Development and has identified suitable controls and mitigation measures to limit the risk of impacts to habitats and species.</p>



Questions to be Considered	Likely / Unlikely	Is This Likely to Result in a Significant Effect?	Proposed Mitigation Measures, if Required	
<b>7. Landscape and Visual</b>				
7.1	<p>Are there any areas or features on or around the location which are protected for their townscape and scenic value, and/or any non-designated / non classified areas or features of high townscape or scenic value on or around the location which could be affected by the Proposed Development? Where designated indicate level of designation (international, national, regional or local).</p>	<p><b>Likely.</b> There are no areas of Area of Outstanding Natural Beauty (AONB) within 2km of the Proposed Development.</p>	<p><b>Likely.</b> Impacts during construction will be minimised through implementation of construction best practice measures, however these will be temporary for the duration of the construction stage, especially after tree removal.</p> <p>The Proposed Development has been designed to minimise impacts to the surrounding landscape during operation. There are no potential significant effects associated with the operation of the Proposed Development as the design has been sensitive in its consideration to the Plymouth City Conservation Area.</p>	<p>Construction related visual impacts will be managed in accordance with construction best practice as outlined within the CEMP.</p>
7.2	<p>Is the Proposed Development in a location where it is likely to be highly visible to many people? (If so, from where, what direction, and what distance?)</p>	<p><b>Likely.</b> The Site is located in the city centre and will therefore be highly visible to users of the city centre. It is unlikely to be visible from long distance as it is screened by retail and commercial buildings to the east and west of the Site. The Site will likely be visible from the Hoe.</p>	<p><b>Likely.</b> There is potential for temporary effects on the visual receptors using the immediate surrounding streets, recreational areas and residential properties.</p> <p>The Proposed Development is naturally screened from long distance views due to its location. The viewpoint of the Hoe which is located Directly south of the scheme as well as the City Conservation Area will be temporarily affected by construction. However, during operation the Proposed Development will complement this viewpoint through design, one of the aims of the Proposed Development is to encourage this viewpoint It is therefore unlikely to lead to significant effects.</p>	<p>Construction related visual impacts will be managed in accordance with construction best practice outlined in the CEMP.</p>





Questions to be Considered	Likely / Unlikely	Is This Likely to Result in a Significant Effect?	Proposed Mitigation Measures, if Required
<b>8. Cultural Heritage / Archaeology</b>			
<p>8.1 Are there any areas or features which are protected for their archaeological value, or any non-designated / classified areas and/or features of archaeological importance on or around the location which could be affected by the Proposed Development (including potential impacts on setting, and views to, from and within)? Where designated indicate level of designation (international, national, regional or local).</p>	<p><b>Unlikely.</b> The site has been heavily developed and any potential archaeological assets would have previously been disturbed in the construction of existing infrastructure. The Proposed Development will not have a direct impact on the heritage assets of the surrounding. In the unlikely case that archaeology is uncovered, suitable controls will be in place.</p>	<p><b>Unlikely.</b> Whilst significant effects have potential to occur during the construction phase of the Proposed Development (i.e. where ground is disturbed, including any preliminary work). However, with the implementation of these standard controls no significant effects are likely to result.</p>	<p>Any construction phase impacts on archaeology will be mitigated through best practice measures are outlined within the CEMP.</p>
<p>8.2 Are there any areas or features which are protected for their cultural heritage value, or any non-designated / classified areas and/or features of cultural heritage importance on or around the location which could be affected by the Proposed Development (including potential impacts on setting, and views to, from and within)? Where designated indicate level of designation (international, national, regional or local).</p>	<p><b>Unlikely.</b> The Site does not contain any nationally designated heritage assets, such as scheduled monuments, listed buildings or registered parks and gardens, as recorded in the National Heritage List for England (NHLE), maintained by Historic England.</p> <p>There are, however, a number of designated assets in the wider area. The settings of these assets may contribute to their overall heritage significance, albeit given the distance from the Site to the heritage asset, it is considered that the Site only makes a very limited contribution to the setting of each asset, as a result of forming part of the urban setting to each asset.</p> <p>The closest heritage asset is 3, 5 and 7, Eton Place Grade II listed building which is located approximately 100m to the northwest of the Site.</p> <p>Civic square, Plymouth Registered battlefield is located approximately 200m south of the Site. The Hoe Registered battlefield is</p>	<p><b>Unlikely.</b> Views from listed buildings and the Schedule Ancient Monument will not be impacted by the Proposed Development as the Site area is naturally screened from Commercial and Retail Buildings.</p> <p>The viewpoint of the Hoe which is located directly south of the Proposed Development as well as the City Conservation Area will be temporarily affected by construction. However, during operation the Proposed Development will complement this viewpoint through design, one of the aims of the scheme is to encourage this viewpoint It is therefore unlikely to lead to significant effects.</p> <p>It is unlikely that there will be significant effects on built heritage given the distance between the Site and the identified heritage assets, as well as the extent of interposing development and green space between the Site and the surrounding heritage assets.</p>	<p>Any construction phase impacts on Heritage will be mitigated through best practice measures to be contained within the CEMP.</p>



	Questions to be Considered	Likely / Unlikely	Is This Likely to Result in a Significant Effect?	Proposed Mitigation Measures, if Required
		<p>located approximately 230m south of the Site.</p> <p>The Royal Citadel Scheduled Monument is located approximately 460m to the southeast of the Proposed Development.</p> <p>The Plymouth City Conservation Area lies within the Site between New George Street and Royal Parade.</p>		
<b>9. Transport and Access</b>				
9.1	<p>Are there any routes in or around the location which are used by the public for access to recreation or other facilities, which could be affected by the Proposed Development?</p>	<p><b>Likely.</b> The Proposed Development is located at the centre of the city. The surrounding road networks such as A374, Cobourg Street and B3240 are susceptible to congestion and the Proposed Development will inherently have some level of vehicular movements associated with it during construction.</p> <p>A new cycle route denoted by a dark pink hue will be developed as part of the Proposed Development and therefore positively benefit the pedestrians and cycle users.</p>	<p><b>Unlikely.</b> Increases in traffic generated as a result of the construction period would be mitigated through best practice construction methods detailed within the CEMP and significant effects are therefore unlikely.</p> <p>During construction public access may be affected due to city centre location, however this will be appropriately managed using a communication plan and by ensuring access is maintained as far as practical.</p> <p>The Proposed Development will have a positive impact on Armada Way as the Proposed Development will create a new pedestrian and cycle route, helping alleviate pressure on the city centre.</p> <p>The standard operation of the Proposed Development will allow pedestrians and cyclists to benefit. Cycle ways will be denoted by a dark pink hue to differentiate them from pedestrian areas to improve safety. As a result, the redevelopment will positively benefit the public through</p>	<p>Any construction phase impacts on public access and traffic management will be mitigated through best practice measures documented within the CEMP.</p>



Questions to be Considered	Likely / Unlikely	Is This Likely to Result in a Significant Effect?	Proposed Mitigation Measures, if Required
		improved aesthetics and recreational facilities. The redevelopment will improve the route between North Cross roundabout through the city centre and a clear visual link to the sea.	
9.2 Are there any transport routes on or around the location which are susceptible to congestion or which cause environmental problems, which could be affected by the Proposed Development?	<p><b>Likely.</b> The Site is located at the centre of the city. The surrounding road networks such as A374, Cobourg Street and B3240 are susceptible to congestion and the Proposed Development will inherently have some level of vehicular movements associated with it during construction.</p> <p>A new cycle route will be developed as part of the Proposed Development and therefore positively benefit the pedestrians and cycle users.</p>	<p><b>Unlikely.</b> Increases in traffic generated as a result of the construction period would be mitigated through best practice construction methods detailed within the CEMP and significant effects are therefore unlikely.</p> <p>There would be no significant increase in traffic generated over the course of a day during operation of the Proposed Development, in fact it is likely there may be a positive impact as it increased connectivity allowing greater pedestrian and cycle access to the Proposed Development.</p> <p>The standard operation of the Proposed Development will allow pedestrians and cyclists to benefit. As a result, the redevelopment will positively benefit the public through improved aesthetics and recreational facilities. The redevelopment will improve the route between North Cross roundabout through the city centre and a clear visual link to the sea.</p>	Any construction phase impacts on traffic management and working hours will be mitigated through best practice measures documented within the CEMP.
<b>10. Land Use</b>			
10.1 Are there existing land uses or community facilities on or around the location which could be affected by the Proposed Development? E.g. housing, densely populated areas, industry / commerce, farm/agricultural holdings, forestry, tourism,	<b>Unlikely.</b> The Site is located in an urban area that will not be affected by the Proposed Development since the scope is to redevelop the existing Armada Way. The	<b>Unlikely.</b> It is not considered that the existing land uses will be significantly affected and any potential effects during construction would be mitigated via the implementation of the best practice site	Any construction phase impacts on working hours will be mitigated through best practice measures documented within the CEMP.



Questions to be Considered	Likely / Unlikely	Is This Likely to Result in a Significant Effect?	Proposed Mitigation Measures, if Required
<p>mining, quarrying, facilities relating to health, education, places of worship, leisure /sports / recreation.</p>	<p>existing Site has a few commercial outlets on either side.</p>	<p>management procedures and ensuring access is maintained during working hours.</p> <p>Overall, it is considered that the Proposed Development would result in a positive effect on regeneration in the area during operation and facilitate new non-motorised user access route, attract more footfall through the city centre through enhancements proposed.</p>	
<p>10.2 Are there any plans for future land uses on or around the location which could be affected by the Proposed Development?</p>	<p><b>Unlikely.</b> The Site is at the centre of the city and urbanised. The surrounding areas are already developed, and the redevelopment of the existing Site will be of positive benefit due to the improvement in accessibility and recreational space therefore it isn't anticipated there would be any negative effects.</p> <p>There are no other known plans for a change to existing land uses on or in close proximity to the Site.</p>	<p><b>Unlikely.</b></p>	<p>N/A</p>
<p><b>11. Land Stability and Climate</b></p>			
<p>11.1 Is the location susceptible to earthquakes, subsidence, landslides, erosion, or extreme /adverse climatic conditions, e.g. temperature inversions, fogs, severe winds, which could cause the Proposed Development to present environmental problems?</p>	<p><b>Unlikely.</b> The Proposed Development is not located in an area that is susceptible to any of these potential environmental problems.</p> <p>The redevelopment will consider climate change by planting new trees and creating infrastructure that are more resilient to an urban environment.</p>	<p><b>Unlikely.</b></p>	<p>N/A</p>
<p><b>12. Cumulative Effects</b></p>			



Questions to be Considered		Likely / Unlikely	Is This Likely to Result in a Significant Effect?	Proposed Mitigation Measures, if Required
12.1	Could this Proposed Development together with existing and/or approved development result in cumulation of impacts together during the construction/operation phase?	There are several other developments which are scheduled including the redevelopment of New George Street, and the Civic Square. There are several other smaller schemes which include provision for electric charge points and encouraging sustainable travel.	<b>Unlikely.</b> If no controls are in place then in cumulation these developments have the potential for significant effects, however once suitable environmental controls are in place for each development then cumulative effects are unlikely.	N/A
<b>13. Transboundary Effects</b>				
13.1	Is the Proposed Development likely to lead to transboundary effects?	<b>Unlikely.</b> The Proposed Development is not near any national boundaries and therefore transboundary effects are not anticipated.	<b>Unlikely.</b>	N/A

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## Appendix B – General Arrangement

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## **Appendix C – Environmental Sensitivities Map**