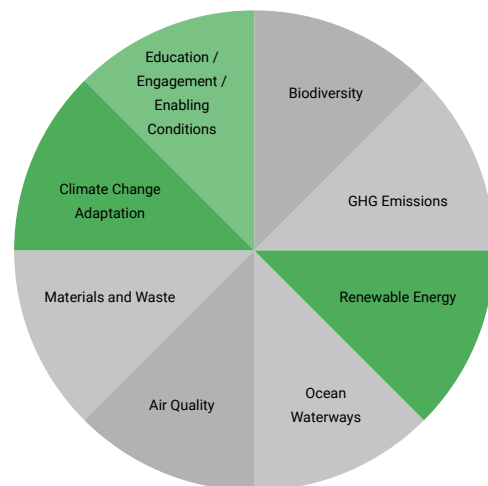


Plymouth and South Devon Freeport FINAL



Assessment ID: PLY444

Assessment Author: Polly Frost

Assessment Initial Summary:

copy summary of project ; why, outcomes, impact ...

Assessment Final Summary:

Biodiversity Score: 2

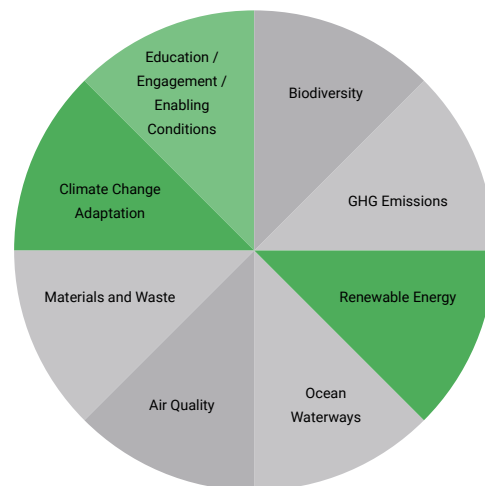
Biodiversity Score Justification: Potential Impact and Risk; - Loss of protected species through development operation of tax/customs sites - Damage to National Marine Park through increased shipping/port activity. The presence of protected species and Priority Habitats and Species and consideration of impacts of a proposed development upon them is a material consideration. Protected species receive levels of protection according to their designation (European, National and Priority Species), and of particular relevance to the JLP area are: European Protected Species that are most likely to be encountered within the Plan Area are bats (17 species), dormice, otters and great crested newts; Nationally protected species most likely to be encountered within the Plan Area are reptiles, Barn Owls and badgers; Priority Species/Species of Principal Importance are identified at a UK scale, a shortlist of which have been identified locally as particularly important and for which Devon has a key responsibility for looking after the species and their supporting habitats, for example, Cirl Bunting; Priority Habitats/Habitats of Principal Importance of which there should be no net loss (otherwise an application may be refused). The vast majority of hedgerows in Devon are Priority Habitats, please see guidance at 'Trees, woodlands and hedgerows (DEV28)' for specific considerations and requirements relating to hedgerows. Supplementary Planning Guidance DEV 26.5 states that net gains in biodiversity will be sought from all major development proposals. The LPAs will consider a 10 per cent increase in biodiversity units when applying the Defra Biodiversity Metric to be policy compliant. Mandatory biodiversity net gain is part of the planning process and applications are required to meet BNG requirements.

Biodiversity Score Mitigate: Yes

Biodiversity Revised Score: 3

Biodiversity Revised Score Justification: Mitigation by freeport: Conduct an Environmental Impact assessment to identify specific risks for protected sites and species, including those offshore. If required new surveys to be undertaken during correct window to observe wildlife. Work with stakeholders such as the National Marine Park and Local Nature

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Partnership to mitigate risks outside the tax sites (including offshore) as well as identify opportunities for Biodiversity Net Gain and sites that can be enjoyed by people working and living in the sites. Mitigation by landlords and tenants: If it is found that there was an impact on protected species through development of the Freeport tax/customs sites, statutory obligations will need to be satisfied.

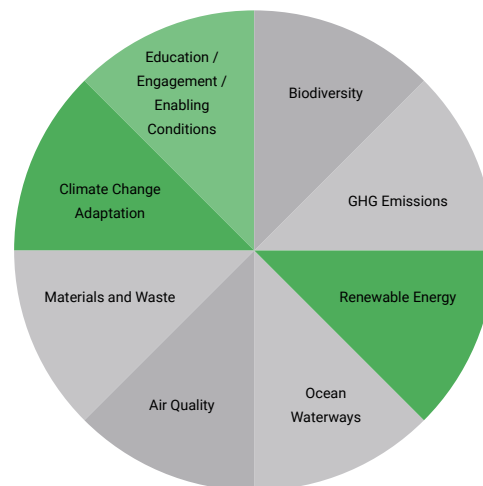
GHG Emissions Score: 2

GHG Emissions Score Justification: Delivery of the tax sites will be co-ordinated by the Freeport Delivery Team which will comprise representatives from Plymouth City Council, Devon County Council and South Hams District Council, in direct collaboration with the responsible planning and transport authorities, landowners, tenants / occupiers and key stakeholders. This is underpinned by robust governance structures which include landowner representation and backed up by our Gateway Policy and landowner agreements, thus enabling Freeport benefits to be realised. Our Gateway Policy and site specific agreements will support us to realise benefits :- South Yard is a 31.9 hectare site located along the waterfront, near to the Port of Plymouth and adjacent to the existing Oceansgate Enterprise Zone. It will form the centrepiece of the Innovation Hotbed. This is a brownfield site and remediation and retrofit works will enhance the energy performance of existing buildings and operations. 48.5 hectares, Langage is our largest tax site which also incorporates a customs site. The site will provide Industrial and Manufacturing as well as Light Industrial units for high value manufacturing/ engineering companies, focusing primarily but not exclusively on the marine, defence and space sectors, with low carbon applications, enabling us to support business expansion, investment and clustering to support the Freeport vision. As part of our value proposition, the site will also be home to a Green Hydrogen Electrolyser. 7.9 hectare Sherford tax site which occupies part of a larger greenfield site owned by the Sherford Consortium with a view to it being developed as warehousing, storage and engineering space. Development of greenfield sites is governed by Freeport commitment to PAS2080 and Planning regulations to minimise GHG emissions throughout construction, operation and end of life. The freeport has conducted a GHG emissions baseline that will be monitored throughout the project.

GHG Emissions Score Mitigate: Yes

GHG Emissions Revised Score: 3

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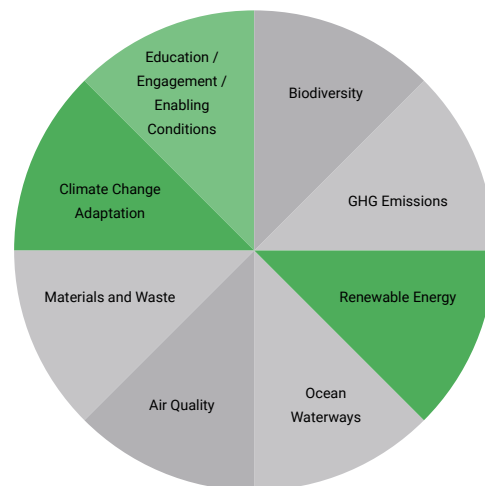


GHG Emissions Revised Score Justification: The freeport's Gateway Policy forms the basis for agreements between the PASD Freeport Board, private sector landowners and tenants who will ultimately be the beneficiaries of the tax site levers including Business Rates Retention (BRR). Compliance with the gateway policy will be the trigger for the consideration of discretionary Business Rates Relief by the relevant Council. The purpose of the Gateway Policy will be to ensure that the PASD Freeport supports the clustering of businesses with a focus on the target sectors; advanced manufacturing and engineering with a particular focus on marine, defence and space with low carbon applications. Our carbon and climate monitoring will identify any residual carbon emissions that have not been mitigated during the construction, operation of the freeport. The freeport business plan declares that 1/3 of retained business rate income to the freeport (once local authority loans have been repaid) will be spent on Net Zero projects, this is likely to include offsetting residual carbon. The Freeport NZ lead works closely with Plymouth Net Zero Action Group and is actively engaged in developing local insetting projects to ensure that any offsets are validated, authentic and provide an income source for local carbon sequestering projects, like seagrass and aqua culture as well as retrofit. Retained business rate policy states that once the borrowing costs of Plymouth City Council, Devon County Council and South Hams District Council have been met, any surplus receipts will be allocated to priorities mutually agreed between the partners at the Freeport Members Steering Group. It is forecast that 33% will be spent on Carbon net zero projects; Developing and delivering arange of low carbon solutions to decrease carbon emissions againstour baseline in accordance with our net zero strategy. This includesopportunities from FLOW, expanding Hydrogen Hubs and other greentechnology opportunities.

Renewable Energy Score: 5

Renewable Energy Score Justification: PASDF Seed capital funded Infrastructure projects include: A Green hydrogen generation plant, which is being developed by landowner Carlton Power. The scheme is a major part of the Freeport's net zero strategy. Renewable energy will be used to produce green hydrogen fuel which will decarbonise industry both within the freeport and in surrounding areas. In the future the upscaled Langage Green Hydrogen plant will also provide energy for transport and heating. Initial (2025) capacity of 10MW, enough to heat 14,000 homes. The plant is a modular build so can expand as the business case becomes viable and grid connections are available. Carlton Power has signed partnership agreements to supply Sibelco and Imerys. The Green Hydrogen plant will become operational in 2025. PASD Freeport Full

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Business Case and Net Zero Opportunities Assessment has conducted a full options analysis for renewable energy opportunities. This is aligned to the commitment to building, operating and end of life plans for the sites to meet PAS 2080 guidelines. These criteria identify additional Opportunities for onsite renewable energy generation, notably solar PV and wind. This is alongside PAS2080 guidance on energy efficiency in buildings operation and construction. Embedded and operational carbon emissions will be monitored by the Freeport company on a quarterly basis. Conditions to do this are included in seed capital business cases and After care plans. Additionally the innovation and operations within the freeport also focus on renewable energy, i.e. being in the supply chain for Celtic sea FLOW. Innovation strands in freeport key sectors; marine, defence and space also prioritise innovations like increase short sea shipping, autonomous shipping, and working with University and innovation partners to clean green industry and advanced manufacturing supply chain and business operations.

Renewable Energy Score Mitigate: Yes

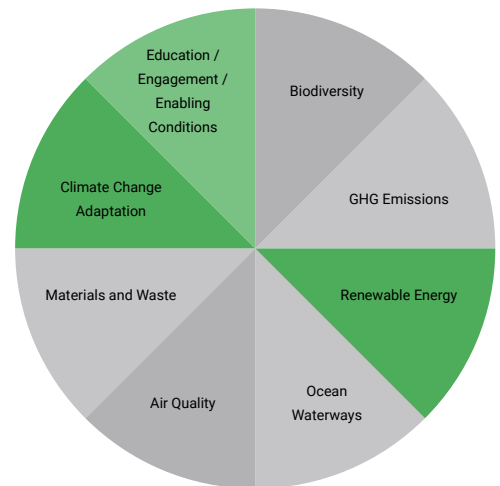
Renewable Energy Revised Score: 5

Renewable Energy Revised Score Justification: Our carbon and climate monitoring will identify any residual carbon emissions that have not been mitigated. The freeport business plan declares that 1/3 of retained business rate income to the freeport (once local authority loans have been repaid) will be spent on Net Zero projects, this is likely to be additional renewable energy generation.

Ocean and Waterways Score: 2

Ocean and Waterways Score Justification: Any Freeport related planning applications will need to comply with the Plymouth and SW Devon Supplementary Planning Document, which contains a section titled 'DEV2.1 and DEV2.3 – Water. This states: DEV2.3 ensures development will not result in an unacceptable harm to the water environment through the deterioration of water quality, and will look to improve water quality. This is required in line with the objectives of the Water Framework Directive (WFD), and to meet requirements under The Habitat Regulations (2017). The WFD sets out objectives to ensure the protection and improvement of the water environment, this includes achieving "good status" of all water bodies and groundwater bodies by set deadlines. Relevant information on water bodies is available via the Environment Agency's Catchment Data Explorer, whilst the River Basin Management Plan sets out objectives for how

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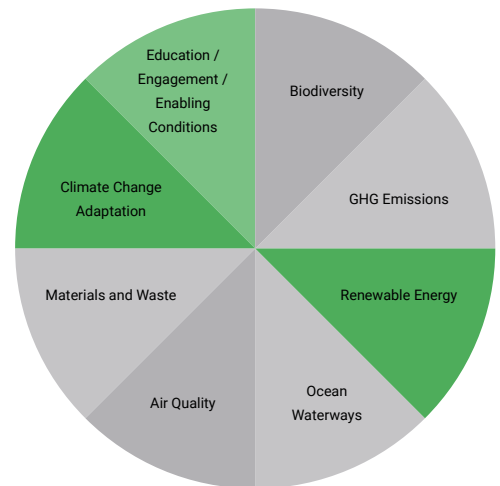
water quality will be improved. It is expected that all developments will comply with the aforementioned documents. All developments should consider potential impacts, direct, indirect or cumulative, to water quality during construction or operation. Any forthcoming applications that are likely to impact the water environment should clearly show how the development may affect relevant water bodies and how any negative impacts are to be mitigated, if these cannot first be avoided. Wherever possible applicants should explore opportunities to improve and/or restore water quality. The environmental sensitivity of the site should also be considered as set out at 7 'Natural environment (DEV23-DEV28)'. All construction activities should follow Pollution Prevention Guidance 6 (PPG 6) and all relevant current Construction Industry Research and Information Association (CIRIA) guidance. Evidence will be required to show that impacts have been considered in relation to the environmental sensitivity of the site. The initial assessment should be proportional to the scale of the development, any significant impacts will be required to be addressed through a Water Framework Directive Assessment. Development may not be supported if there is likely to be interruption to the quantity or quality of water available to off-site supplies. Evidence may be required if a development is identified as having an unacceptable impact on private water supplies in the vicinity of the proposed development. Plymouth Marine Park are a stakeholder of the Freeport and we work closely with them on joint engagement and opportunities.

Ocean and Waterways Score Mitigate: Yes

Ocean and Waterways Revised Score: 3

Ocean and Waterways Revised Score Justification: Any Freeport related planning applications will need to comply with the Plymouth and SW Devon Supplementary Planning Document, which contains a section titled 'DEV2.1 and DEV2.3 – Water. This states: DEV2.3 ensures development will not result in an unacceptable harm to the water environment through the deterioration of water quality, and will look to improve water quality. This is required in line with the objectives of the Water Framework Directive (WFD), and to meet requirements under The Habitat Regulations (2017). The WFD sets out objectives to ensure the protection and improvement of the water environment, this includes achieving "good status" of all water bodies and groundwater bodies by set deadlines. Relevant information on water bodies is available via the Environment Agency's Catchment Data Explorer, whilst the River Basin Management Plan sets out objectives for how water quality will be improved. It is expected that all developments will comply with the aforementioned documents. All developments should consider potential impacts, direct, indirect or cumulative, to water quality during construction or operation. Any forthcoming

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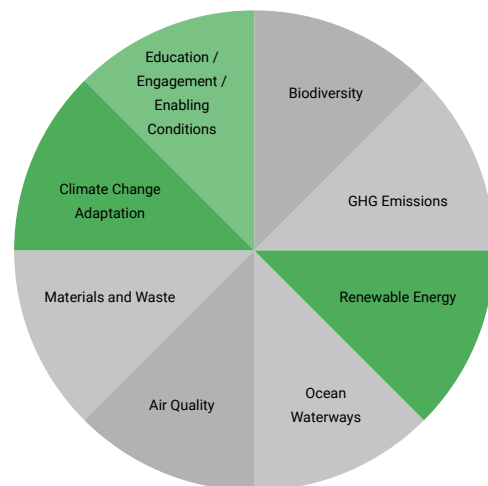
applications that are likely to impact the water environment should clearly show how the development may affect relevant water bodies and how any negative impacts are to be mitigated, if these cannot first be avoided. Wherever possible applicants should explore opportunities to improve and/or restore water quality. The environmental sensitivity of the site should also be considered as set out at 7 'Natural environment (DEV23-DEV28)'. All construction activities should follow Pollution Prevention Guidance 6 (PPG 6) and all relevant current Construction Industry Research and Information Association (CIRIA) guidance. Evidence will be required to show that impacts have been considered in relation to the environmental sensitivity of the site. The initial assessment should be proportional to the scale of the development, any significant impacts will be required to be addressed through a Water Framework Directive Assessment. Development may not be supported if there is likely to be interruption to the quantity or quality of water available to off-site supplies. Evidence may be required if a development is identified as having an unacceptable impact on private water supplies in the vicinity of the proposed development. Plymouth Marine Park are a stakeholder of the Freeport and we work closely with them on joint engagement and opportunities.

Air Quality Score: 3

Air Quality Score Justification: Impact/ Risk; Reduction in air quality standards due to increased road and sea traffic and industrial processes. Any Freeport related planning applications will need to comply with the Plymouth and SW Devon Supplementary Planning Document, which contains a section titled 'DEV2.1 and DEV2.2 – Air. Both DEV2.1 and DEV2.2 aim to minimise negative air quality impacts by development proposals. Developments will normally be refused where a development is going to have a significant impact on an Air Quality Management Areas (AQMA), create a new AQMA, or result in an adverse effect on a European Site. Maps showing the AQMAs across the Plan Area are available for Plymouth City Council and South Hams District Council. When ensuring development proposals avoid or mitigate against having a negative impact on air, the type of mitigation required on a particular development should be informed by:

- Outcomes from transport statements, assessments and plans;
- Air Quality Assessments or emission profiling;
- LPAs' Air Quality Action Plans;
- Specific needs identified in site specific spatial policy allocations;
- Travel awareness/planning and highway development requirements;
- The latest Defra Local Air Quality Management Guidance. The latest information to be found on the UK Air Pollution Information System;
- Relevant technical guidance and acknowledged best practice; and/or
- Any other measures that the applicant can evidence which will result in a

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net reduction in the air quality impact of the development. Whilst the LPAs recognise the importance of the Government's 'Road to Zero Strategy' and supports the aim of decarbonising transport networks, there are also other opportunities within the transport networks to make small improvements that will have significant positive impacts on air quality. The LPAs expect all new development proposals to take into consideration the below list of potential measures:

- ☐ Provision of electric vehicle charging points (Guidance on the requirements of electric vehicle charging points can be found at 'Specific provisions relating to transport (DEV29)');
- ☐ Designation of parking spaces for low emission vehicles;
- ☐ Provision of facilities to encourage sustainable travel, such as cycling facilities;
- ☐ Travel planning with new residents/businesses to encourage travel by sustainable transport modes as well as the uptake of ultra-low emission vehicles;
- ☐ Green travel vouchers;
- ☐ Facilities within developments which support active modes of transport such as: drying rooms; showers and lockers etc.
- ☐ Ensuring good connectivity to existing and future public transport, cycle and pedestrian routes;
- The provision of appropriate trees and landscaping features to reflect the importance of 'right tree (or landscaping feature) in the right place'.

For major developments which are likely to have a negative impact on air quality, the level of contribution towards offsetting measures will be calculated based upon the damage caused by the additional emissions, having regard to published national guidance on the calculations of such costs such as the Land-Use Planning & Development Control: Planning For Air Quality. This approach allows for mitigation measures to be delivered in line with any existing air quality action plans. Any mitigation measures will be secured through planning conditions or through planning obligations and will be negotiated on a case-by-case basis.

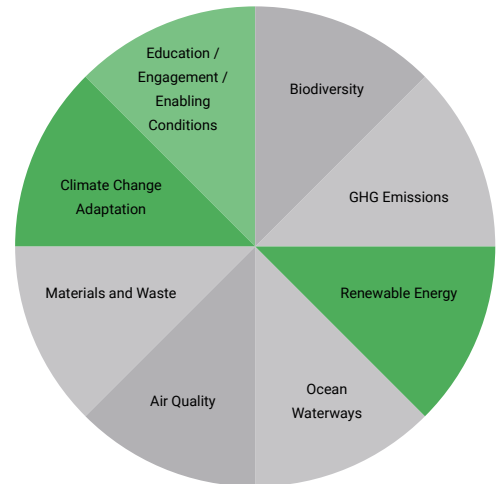
Air Quality Score Mitigate: Yes

Air Quality Revised Score: 3

Air Quality Revised Score Justification: Mitigations by Freeport: Conduct an Environmental Impact assessment to identify specific air quality risks. Potential to undertake a strategic transport vision across all three site and transport assessments with low-med-high scenarios including robust transport modelling. Seed capital will be used to build pedestrian/cycle bridge between Sherford and Langage to reduce commuter emissions. Other mitigations are likely to include:

- ☐ Development of an Air Quality Plan to reduce emissions from diesel engines. Which may include the introduction of an Air Quality Management Area within Plymouth Sound. (linked to smart sound) in which vessels are required to switch to clean propulsion systems when they enter
- ☐ Development of a Green Transport Plan for the Freeport and each tax site to include - Public transport
 - o Walking and cycling
 - o Charging infrastructure
 - o Low carbon freight options

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(potentially linked to the Green Hydrogen plant) Innovation activity without industrial and academic partners to develop cleaner/low emission processes (e.g. Princess Yachts are breaking new ground in large scale resin infusion technology, a closed moulded process which almost completely eliminates styrene emissions in the workplace and local environment) Mitigations by landowners/ tenants: Will be required to meet planning requirements Identification and mitigation of any industrial processes which may result in emissions and compliance with relevant legislation Participation in Freeport initiatives to reduce transport related emissions Participation in voluntary innovation activity to develop cleaner processes.

Materials and Waste Score: 2

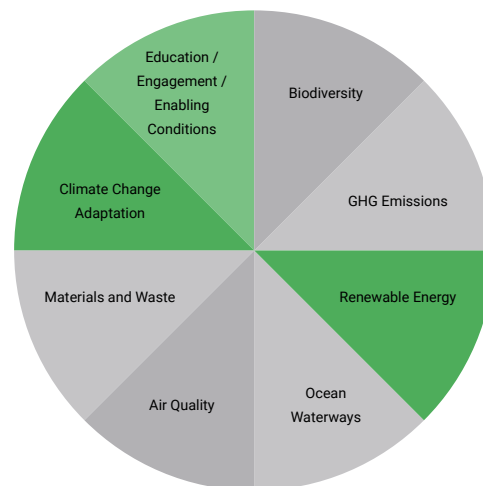
Materials and Waste Score Justification: The risk is failure to ensure waste is disposed of responsibly and in accordance with the law. The freeport refers to Environmental Protection Act Hazardous Waste Regulations Producer Responsibility Obligations Waste Electrical and Electronic Equipment. Paragraph 8 of the National Planning Policy for Waste and Policy W4 of the Devon Waste Plan requires major development proposals within Devon County Council (sites Sherford and Langage) to be accompanied by a Waste Audit Statement. Devon County Council has published a Waste Management and Infrastructure SPD that provides guidance on the production of Waste Audit Statements. This can be found online at: <https://new.devon.gov.uk/planning/planning-policies/other-county-policy-and-guidance>

Materials and Waste Score Mitigate: Yes

Materials and Waste Revised Score: 3

Materials and Waste Revised Score Justification: Mitigations by Freeport; Conduct an Environmental Impact assessment to identify specific waste management risks Work with landowners and tenants to identify and mitigate waste management risks Develop initiatives which encourage landowners/tenants to: Reduce, re-use, recycle Minimise waste going to landfill Increase recycling Reduce waste in the economy (e.g. through circular economy principles) Promote complementary initiatives such as the Preventing Plastic Pollution Project (an Interreg project involving PCC and PU). Mitigations by Tenants and Landlords: Ensure all waste management regulations are complied with and the approach to waste management follows the Waste Management Plan for England. Participation in voluntary

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wastemanagementinitiatives such asthe PreventingPlastic PollutionProject.

Climate Change Adaptation Score: 3

Climate Change Adaptation Score Justification: The freeport has contributed to and is informed byThe Devon Cornwall and Isles of Scilly Climate Adaptation Strategy. This helps communities and organisations across the Southwest better understand the risks their area will face in the future, as climate change increasingly affects the UK. It will also help them to adapt to these changes, thereby improving their resilience and community safety.Resources to help individuals, communities, organisations and local policy makers take action for climate adaptation and prepare for climate impacts. Using this framework and the Freeport's own Net Zero Strategy and Action Plan the freeport will monitor it's delivery and actions in the face of changing climate and adaptations.

Climate Change Adaptation Score Mitigate: Yes

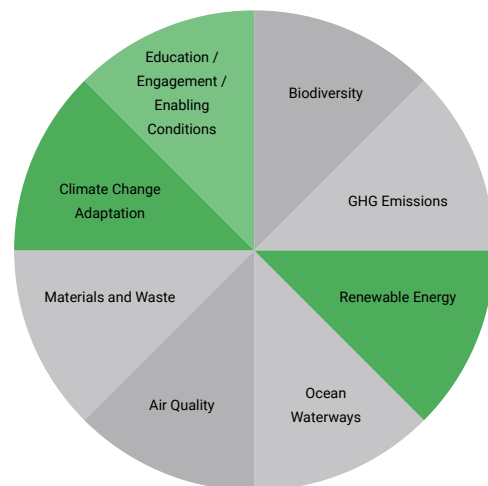
Climate Change Adaptation Revised Score: 5

Climate Change Adaptation Revised Score Justification: The freeport has contributed to and is informed byThe Devon Cornwall and Isles of Scilly Climate Adaptation Strategy. This helps communities and organisations across the Southwest better understand the risks their area will face in the future, as climate change increasingly affects the UK. It will also help them to adapt to these changes, thereby improving their resilience and community safety.Resources to help individuals, communities, organisations and local policy makers take action for climate adaptation and prepare for climate impacts. Using this framework and the Freeport's own Net Zero Strategy and Action Plan the freeport will monitor it's delivery and actions in the face of changing climate and adaptations.

Education / Engagement / Enabling Conditions Score: 5

Education / Engagement / Enabling Conditions Score Justification: Impact of skills strategy;The Freeport is a facilitator of closer collaboration between businesses and education providers, with the following objectives as focal points:Retaining people in the regionDeveloping new course content and future rolesProvision of tutors and spacesDefining future skills roles in greater

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detail. Working across the Freeport Skills advisory board the freeport will build greater gender diversity, particularly in those moving into employment post-qualification, supplementing the various other inclusivity workstreams underway or planned within the region. The Freeport acts as a natural focal point for businesses and education providers. This collaboration already exists, however the Freeport can serve to aggregate pockets of collaboration and drive greater ambition across the region. With target sectors and long term investments planned for the Freeport, greater and clearer needs can create a mandate for collaboration. The Freeport can serve as a beacon for great careers and build a strong reputation for any employers active on the site. A Government mandate by virtue of public investment and tax incentives can be used to drive progress. The Pedestrian and Cycle bridge will create new opportunities for green and active travel.

Education / Engagement / Enabling Conditions Score Mitigate: Yes

Education / Engagement / Enabling Conditions Revised Score: 5

Education / Engagement / Enabling Conditions Revised Score Justification: The freeport and its construction partners and contractors are part of Plymouth Skills Launchpad and Skills 2 Plymouth which includes construction skills. Procured construction companies will adhere to social value requirements. Additionally working with partners like Trade Unions, Plymouth National Marine Park, training providers and colleges raised the profile of green skills among residents in the city.

Wheel Key

- Long lasting or severe negative impact
- Short term or limited negative impact
- No impact or neutral impact
- Short term or limited positive impact
- Long lasting or extensive positive impact