

ITEM: 03

Application Number: 10/00640/FUL

Applicant: Princess Yachts International PLC

Description of Application: Development of a new production facility, office building, test facility and associated external works

Type of Application: Full Application

Site Address: HM NAVAL BASE, SOUTH YARD DEVONPORT
PLYMOUTH

Ward: Devonport

Valid Date of Application: 26/04/2010

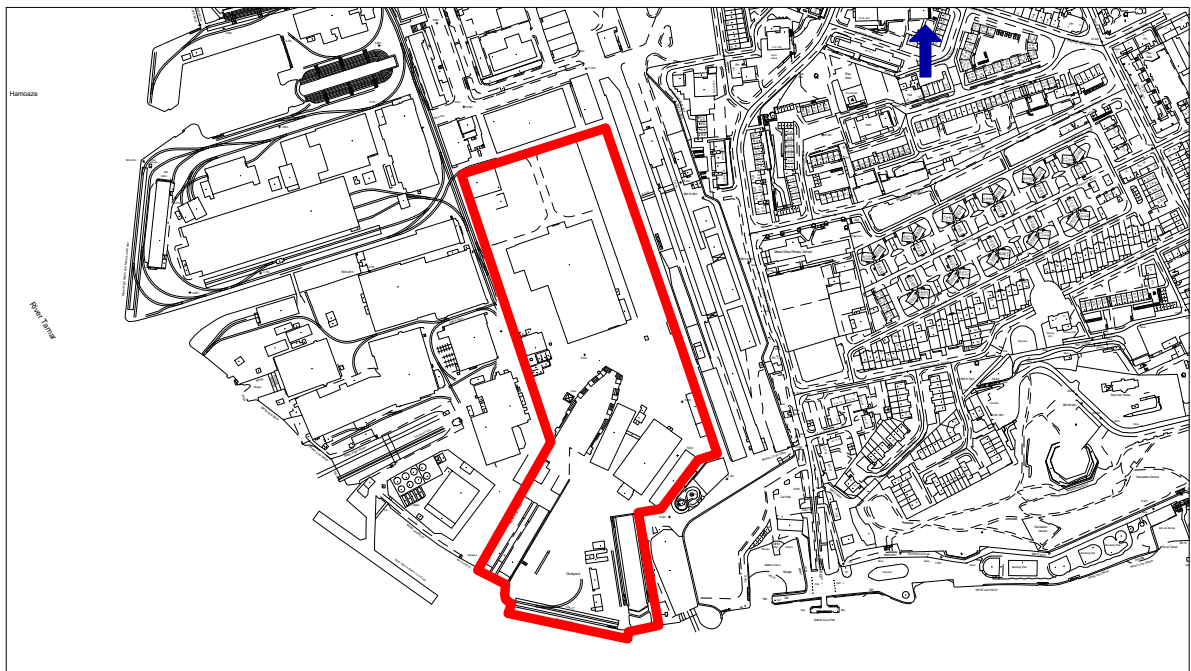
8/13 Week Date: **26/07/2010**

Decision Category: Major Application

Case Officer : Jeremy Guise

Recommendation: **Grant conditionally subject to S106 Obligation, Delegated authority to refuse if S106 not signed within 3 months of the committee date**

Click for Application Documents: www.plymouth.gov.uk



(c) Crown Copyright. All rights reserved. Plymouth City Council Licence No. 100018633 Published 2010 Scale 1:6000

OFFICERS REPORT

Site Description

The application site is an irregular shaped piece of land (approximately 5.87ha) located within the South Yard, formerly a 'closed' military enclave in south western most extremity of the city. The northern part is rectangular in shape, a flat piece of 'made up' land sandwiched between historic dockyard buildings - notably the East Ropery, on higher ground to the east, and the Sawmill and smithy, to the west. The southern part of the site is a wedge shaped piece of land abutting the Hamoaze (River Tamar) waterfront between No. 2 and No. 3 slips.

The site contains two buildings: a warehouse building, known as Building S173, in the south eastern corner; and a large manufacturing shed, known as S130 (No.3 Shop), in the centre of the site. Neither is afforded any formal protection, although warehouse building was identified as being of 'Townscape merit' in *Devonport Characterisation Study and Management Proposals*. The only other notable feature in what is otherwise a hard surface site is the 'raised head' of No.3 slip - a sloping, concrete covered, mound that was built at the early part of the twentieth century to facilitate the construction of Dreadnaughts. Underground there is the archaeological remains of the eighteenth century 'mast ponds', which were filled with rubble from bombed buildings after WWII, and a major culvert and pumping station belonging to South West Water (SWW). Until fairly recently this part of the site was occupied by large functional sheds, constructed by the navy during the Cold War.

The site is located in the 'bombed out' middle section of the oldest, eighteenth century, part of the dockyard. Around the site are the surviving structures from what was, in the eighteenth and early nineteenth centuries, a state of the art naval manufacturing complex surround the site. The most important are to the east and south east. The East Ropery (listed grade I) is a long, narrow building. Its western elevation comprises of rows of windows in a limestone façade. Currently it dominates the main part of the site, on higher land. In the far south eastern corner is the William III Gazebo, an historic viewing platform from which the monarch could view his shipyard, and the covered slip No.1, a rare surviving example of early warship building infrastructure. The sawmill and smithy (both listed grade II), are located to the west of the main part of the site and there is a further listed building to the north. For the most part these listed buildings are unused or underused, and in a neglected condition.

The site is located in the secure 'military' part of the South Yard. All vehicular and pedestrian access is processed via the security controlled Granby Gate dockyard entrance, to the north.

Finally, in relation to the description of the site, it should be noted that there are significant strategic views into the site from the Hamoaze and Mount Edgecombe, to the south west.

Proposal Description

Planning permission is sought for a new production facility, office building and test facility for Princess Yachts International Ltd, a locally based, French owned, manufacturer of luxury motor yachts. The *Design and Access statement*, that accompanies the application, explains that the firm's current facilities, at Newport Street, Plymouth, Coypool, Language and Lee Mill, are not suitable for manufacturing the range of larger yachts demanded by customers and that the Government's decision to release sections of HM Dockyard Devonport offers opportunity for the firm to expand in Plymouth, retaining its' local connections – skills, suppliers, knowledge base.

The proposal contains three elements: a three phase production facility in the middle of the site, a weatherproof roof structure over No.2 slip and a sales and management office building on the southern edge of the site together with associated car parking.

The production facility

The production facility building is shown occupying approximately one third of the overall site area. It is 25m. high (to ridge); 63m wide and 245m in length (3x82m – approx. 363,000 cubic metres when all three sections are built). It takes the form of a very large rectangular 'shed' structure, whose shape, location and size is largely determined by the boundaries of the site and the applicant's design requirement that it house enormous overhead crane structures capable of lifting and conveying the hulls of the 50m length motor yachts down the assembly line during the manufacturing process.

Aircraft hanger scale sliding doors, displaying the company's 'Princess' logo in 2m high letters dominate the western elevation. They open out into a 52m wide forecourt area, designed to be of just sufficient width to turn a mega yacht. The eastern, and two end, elevations, which are closer to more sensitive historic assets, are have stratified bands of windows and coloured panels of composite metal cladding. The colour and width of the panels bleeds upwards, getting thinner in width, and lighter in colour, as they move from ground to sky, and are designed partly to provide interest to this elevation, and partly mitigate the impact and sheer scale of the building.

Princess Yachts have confirmed their intention to construct all three phases of the proposal in due course, but initially their plan is to construct the southernmost first phase retaining and utilising the existing S130 building in the centre of the site and only demolishing it when ready to implement phase II.

Office building

The architectural centrepiece of the development is the proposed sales and management office on the waterfront. Plans show as an elegant, two storey, 'pavilion style' building with strong rectilinear form. The building would provide 3,710sqm of office space and be in distinct contrast to the existing historic buildings; the curve of the proposed test tank cover or the base functionality of the massive production sheds.

Test facility

The shallow dock test tank structure is essentially a weather shelter which has been designed to provide a degree of protection from the elements whilst the motor yachts are being tested and finished. It covers an existing shallow dock and is in such close proximity to the historic No.1 covered slip that there is limited opportunity to provide structural support on the eastern side. What is proposed is a simple arched structure, rising from the ground on the western side of the slip to a height of approximately 15m (just under that of the covered No1 slip). It is shown as a standing seam metal profiled roof resting on eleven slender steel columns on the eastern side.

Parking access and associated infrastructure

A total of 421 car parking spaces 93 cycle spaces are proposed accessed off a gyratory system around the main production building. The parking is concentrated in four locations around the proposed development:

178 spaces at the northern end of the development adjacent to the heavy vehicles and staff entrance; 96 spaces along the western boundary of the site between the heavy vehicles and office entrance; 52 spaces between phase 1 of the main production facility and the proposed covered test tank and a further 95 spaces in a proposed wedge shaped area between the proposed covered test tank and the sales and warehouse office.

Floating pontoons, between No. 3 slip and the test tank, are shown on plan. This will facilitate sea transfer of completed yachts between sites and remove the need to transport the yachts via the public road network.

In addition to the Design and Access Statement, the following specialist reports have been produced to accompany the application:- Historic Impact Assessment; Archaeological Assessment; Ecological Assessment; FRA & Drainage Strategy; Geo-Environmental Desk Study; Engineering Services report; Renewables Report; Shallow Dock Lighting Report; Structural Strategy; Travel Plan & Transport Assessment; Waste Management Report and Hazardous Substances report.

Relevant Planning History

Military occupation of the site pre-dates the planning system with the post war modern buildings that occupy the site and surrounding are erected during the period when the MOD had Crown exemption from planning control.

Consultation Responses

Highways Agency:-

The views of the Highways Agency are awaited

Highway Authority:- Comment on a number of different highway aspects in respect of this application:-

Traffic Impact

As the proposed use is located within what was previously an active area of the Naval Dockyard, the applicant's traffic consultant has assessed the level of traffic movement that could have resulted from the previous use of the site and subtracted this from the trip generation associated with the proposed Princess Yachts use to give a net traffic impact.

Whilst it is the view of the Highway Authority that the trip rates derived from TRIC's for the former B8 (Storage and Distribution) Use is a little on the high side (as sites chosen from TRIC's database include distribution centres for large supermarkets), it is accepted that previously some of the B8 areas could have been used for the purposes of more intensive B2 (Industrial). Therefore it has been decided to agree to the use of these trip rates.

Following the undertaking of a sensitivity test to remove sites from TRIC's where shift-working was in operation, the revised trip rates obtained for the proposed manufacturing use reveals that it will generate around 121 trips between the hours of 07.30-08.30 and 140 trips (arrivals and departures) in the pm peak of 17.00-18.00. It is worth noting that in terms of overall number of movements on the local highway network, there is little difference between the 'assessed' am peak hour of 07.30-08.30 and the more traditional peak hour of 08.00-09.00.

On the basis of the above-mentioned figures it is the view of the Highway Authority that the number of additional trips arising from the proposed development is considerable and could lead to a deterioration in operating conditions on the local highway network without suitable mitigation being in place (robust and effective travel plan).

Car Parking

Based upon a site accessibility score of 80%, a total of 417 off-street car parking spaces would be required to serve the various quantum of development on the site (a combination of B1, B2 and B8 uses). Whilst the proposed total of 421 spaces represents a slight over-provision in parking numbers (4 spaces) the Highway Authority do not wish to object on such a small number.

As the development will be built out in 3 phases it will be necessary for the phased release of car parking spaces to ensure that the early phases (1 and 2) are not over-provided in terms of parking (which would not assist in helping to achieve the agreed modal shift targets included in the travel plan). The Highway Authority therefore recommend that a condition be attached which calls for the submission of a Car Parking Management Strategy for the site which shall detail how the use of the car parking areas will be controlled/managed along with details of the phasing arrangements. This strategy should be supported by a Car Parking Management Phasing Plan.

A total of 93 secure and covered cycle parking spaces have been proposed which accords with the policy requirements of Policy CS28 of the Core Strategy (sub-section 6) which relates to the application of minimum cycle parking standards. These spaces should be both secure and covered.

Layout

- In order to address the safety of pedestrians walking to and from the site within the Dockyard itself, it will be necessary for a continuous pedestrian route to be provided from the Granby Gate entrance up to the site access into the Princess Yachts site. Figure 4.1 of the TA (which indicates the proposed pedestrian route) identifies the lack of any such dedicated facilities through the area described as being 'lightly trafficked'. Whilst the suggestion that this area is lightly trafficked means there is less likely to be conflict between pedestrians and motorists, it would be preferable to see some form of pedestrian route provided through this area. This could be achieved with appropriate signing and lining.

- There will also be a need to provide pedestrian routes through the site, particularly in respect of accessing the staff entrances (most of which are located to the rear of the building) from the car parking areas which are located on either side and along the front of the site. Dedicated footways should be provided through the car parking areas to ensure that staff do not come into direct conflict with vehicles manoeuvring into and out of spaces. It is recommended that a condition be attached relating to the provision of safe pedestrian routes both inside and outside the site. It is noted that works outside the red-line boundary will require the permission of a Third Party (MOD).

- As the development is to be completed in 3 phases there is likely to be a need for alternative access routes to be implemented within the site as each phase is constructed/completed. It is recommended that a further condition be attached relating to traffic routes proposed for each phase of the development being agreed in accordance with details to be submitted to and approved in writing by the LPA (which shall also require appropriate signing and lining). To ensure that they stand out, the vehicular routes should be treated in a different way to the remainder of vehicle/parking areas.

- It is noted that loading/unloading bays will be provided to the rear of the building. The provision and use of these areas should be made subject to a condition.

- The Highway Authority reiterate the need for cycle parking to be both secure and covered. The use of Sheffield type hoops (as previously indicated) is not considered to address the security concerns. Also the spaces must be adequately covered.

Travel Plan

Following detailed discussion with the applicant's transport consultant it is the view of the Highway Authority that a particularly robust and effective Framework Travel Plan (FTP) has been developed which will help mitigate the impact of the additional development trips on the operation of the local highway network.

The applicant has agreed to secure (through a Section 106 Obligation, see below) funding of up to £78,765.00 that will help finance measures included within the FTP that will help deliver the proposed modal shift targets such as the provision of free travel passes for up to 15% of the total number of staff for up to a period of 9 months (this is slightly in excess of the 12% PT modal split target to ensure that there is the best possibility of actually securing this target).

Rather than PCC secure this funding it is recommended that the amount (that will be split into 3 amounts of £26,255 for each of the 3 phases) be placed in a Travel Plan account that will be set up by Princess Yachts. The TP co-ordinator will then have the flexibility to spend the funding in accordance with the overall requirements of the FTP (promotional events, marketing etc). However to ensure that the funds are being used in the best possible way to secure the predicted modal shift targets, they will be subject to a 6 monthly audit by PCC.

The predicted modal shift targets included within the FTP are based upon existing Travel to Work Census Data for the Ward of Devonport. This is considered to be a good starting point, with single occupancy car trips reducing to 58% (from a starting point of 66%) within 54 months. Whilst challenging, the proposed modal shift targets are considered to be realistic.

Further measures included within the FTP and worthy of mention include a statutory car-freeday once a week for all staff (staff having to travel to the site by a sustainable mode of transport at least once a week), 93 secure and covered cycle parking spaces, commitment to joining-up to the Green Staff Travel Scheme and vouchers towards a car valet for the top 10 car sharers. In respect of the latter that applicant has agreed to look into setting-up a private car sharing area for Princess Yachts employees within the carsharedevon database.

Whilst the general content of the FTP is considered acceptable it is recommended that the final approval of the document be made subject to a Planning Condition or preferably a S.106 Obligation.

Section 106 Agreement

In order to safeguard the above-mentioned financial commitments towards the Travel Plan they will need to be secured as a S.106 Obligation. As outlined above the Local Authority will not receive these monies directly but will have the ability to audit the account on a 6-monthly basis. This information should be included within the Legal Agreement.

Furthermore due to its' strategic importance in delivering a sustainable development I would recommend that the provision of the TP also be made an obligation of the S.106 Agreement.

Conclusion

On the basis of the applicant entering into a particularly robust TP which contains a number of effective measures that will help deliver the proposed

modal shift targets, the Highway Authority not wish to raise any highway objections to this application

Public Protection Service: - Are not in a position to finalise their comments upon the proposal until further information is provided, but have made the following interim comments upon the land quality / contamination and noise issues.

In relation to land quality, Public Protection Service are broadly satisfied with the information provided in the Geo-Environmental Desk Study and seek a conditional regime with conditions covering: land quality, site characterisation, submission of remediation scheme, implementation of approved remediation scheme and reporting unexpected contamination. Some overlap and duplication with the Environment Agency's recommended contamination conditions is acknowledged, and clarification and assurance is also sought from the applicant's consultants that they have considered the potential human health impact of historical radioactive contamination of the site.

In relation to noise issues, there is concern about the impact of the proposal on residential property in the area. It is pointed out that there has been significant redevelopment in the area with replacement residential properties only 100 metres away from the 'proposed' main production facility, and that this area of South Yard has not seen major industrial use for many years.

Public Protection Service wish see determination of the application deferred until a noise impact assessment has been carried out to the methodologies prescribed in BS4142 1997 (method for rating industrial noise affecting mixed residential and industrial areas, to assess the current night time and day time ambient noise levels). With a BS4142 assessment it would be possible to determine the current ambient baseline conditions and apply a condition to ensure that Princes Yachts do not exceed more than 5db above this making any potential noise complaints easier to control.

Maritime Plymouth:- Maritime Plymouth supports Princess Yachts' application for a new production facility in South Yard. The company is a critical driver of the local maritime cluster and this will make its future here more certain. It is entirely appropriate development for the area, but we note with regret that there is no strategic plan for the South Yard against which this application can be measured.

Environment Agency – Have no objection to the proposal subject to the inclusion of conditions covering:-risks associated with contamination and implementation in strict accordance with construction environment management plan.

Government Historic Estates Unit (English Heritage)

Introduction

The Princess Yachts leasehold site at the southern end of South Yard lies at approximately 5m O.D. and measures approximately 440m N-S, and 140m E-W. It covers an area of approximately 5.71ha which is some 19% of the area

of the historic South Yard of 30ha. The site is defined and protected by security fencing installed by Princess Yachts who are currently utilising the existing ex-Ministry of Defence modern building S130 on site for yacht construction.

Devonport Dockyard was established in the 1690s. The southern part of South Yard - which includes the Princess Yachts site - was leased from Sir William Morice in 1727 and initially developed as a timber ground and mast pond (Plymouth City Council, *Devonport Characterisation Study and Management Proposals* (2006) page 16). Subsequent eighteenth-century structures include No. 3 Slip, the 1760s Ropery complex to the east and the 1770s No.1 Covered Slip. Substantial building took place to about 1850 including roofing over the No. 1 Covered Slip in 1814, culminating in the re-configured South Smithery, and the construction of the South Sawmills in 1856. A dockyard railway linked many of the buildings. The mid-Victorian steam navy required much larger-scale factory workshops and building development in the dockyard shifted northwards to the reclaimed North Yard and the Keyham extension. This left South Yard relatively unaltered until the beginning of the C20 when building S173 was constructed, No. 3 slip was extended to accommodate the construction of Dreadnoughts, and a neighbouring 1820s slip was adapted as a shallow dock.

Notwithstanding substantial destruction by the 1940s bombing, and the subsequent in-filling of the Boat and Mast Ponds with demolition rubble, South Yard retains a rich concentration of designated and non-designated heritage assets:

The rapid development of Devonport during this period [1690s-1914] can be attributed to the existence and expansion of the Dockyard. The result within Devonport is a remarkable and varied architectural legacy of considerable importance and interest. Despite the ravages of World War II, and subsequent post-war redevelopment, substantial elements of the historic town and dockyards remain today.

Devonport Characterisation Study and Management Proposals, page 12.

South Yard retains evidence above and below ground of the key periods in the evolution of the Royal Dockyard which is considered by Jonathan Coad as "arguably the finest and best planned of all of the Royal Navy's Georgian dockyards" (quoted in *Devonport Characterisation Study and Management Proposals*, page 40). The character of the heritage assets on the site is derived from their construction and function as dockyard structures from the late eighteenth- to the early twentieth century. Most of these buildings are constructed of local Plymouth limestone, and are generally two or three storeys in height. South Yard contains four scheduled monuments and 33 listed buildings (1 grade I, 13 grade II* and 19 grade II). Nineteen designated assets lie in the area immediately adjoining the Princess Yachts site. These include the remains of the Plymouth limestone West Ropery immediately to the north (scheduled monument PY654), the dominant East Ropery (grade 1) founded on a low terrace which overlooks South Yard, the 1822 Gazebo on the Mount also overlooking the yard (grade II*) and the adjacent No. 1 Covered Slip (scheduled monument PY660 & grade II*). Extensive remains of

the dockyard railway tracks survive either exposed or beneath modern surfaces. The southern end of the Princess Yachts site also contains the 1903 Relay warehouse building (S173), the 1911 extension to the late eighteenth-century No. 3 slip, and the 1912 Shallow dock. The historical context for these three assets is the naval arms race between Britain and Germany immediately prior to the First World War.

There is no conservation management plan for the area (although we have recommended to the Ministry of Defence that one should be produced to inform any new developments). Nevertheless, Plymouth City Council's *Devonport Characterisation Study and Management Proposals* demonstrate that the quality of the heritage assets in South Yard unquestionably qualifies for designation as a conservation area. The *Devonport Characterisation Study and Management Proposals* did not recommend adding the dockyard to the existing conservation area for the civilian estate in 2006 because of the dockyard's physical separation, but suggested that a separate conservation area for parts of the dockyard may be considered in the future (page 112).

South Yard contains three buildings on the 2010 English Heritage Buildings at Risk Register: South Smithery (grade II*), South Sawmills (grade II*) and Master Ropemaker's House (grade II). None of these is within the Princess Yachts site, although they lie on or near the perimeter of the leasehold area.

Within the leasehold area three separate but related developments are proposed:

1 Yacht production facility

A new three-phase production facility, each phase being approximately 80m wide, 65m deep and approximately 25m high to the ridge, with a total length of approximately 250m. The area totals 15180 sq m. The facility is described as a "linear industrial type building" with proprietary cladding in a range of banded colours from warm grey to "mauve/taupe to honey-like colours".

2 Test Tank

A new curved cover building to the 1912 shallow dock to provide a test tank facility, comprising a curved standing seam metal profiled roof rising to approximately 15m on the east side.

3 Staff and Management Office

A new flat-roofed sales & management office sited to the north of the proposed test tank has a "first floor cantilevering over the ground floor creating a 'floating box appearance'". The façade comprises a "glazed curtain walling system with random spandrel panels".

Summary

Ship-building has been associated with South Yard since the 1690s. We welcome and encourage continued shipbuilding in South Yard, and Princess Yachts' proposal to manufacture yachts is an appropriate use. However, we do object to the location and overall size of the proposed incremental three-phase production facility which would result in irreversible harm to the setting of highly graded heritage assets, the loss of below ground archaeology and historic surfaces, and the demolition of the undesignated heritage assets

S173 and the significant Dreadnought extension to No. 3 Slip. We also have reservations about the current design of the proposed sales and management office.

English Heritage Advice

The management proposals in the *Devonport Characterisation Study and Management Proposals* cover both the civilian town and the dockyard and are set within Plymouth City Council's planning policy framework. The *Devonport Characterisation Study and Management Proposals* were endorsed by Plymouth City Council in their *Devonport Area Action Plan 2006-21*, page 44, as one of a suite of documents contributing to the local development framework. Accordingly, English Heritage's comments on the proposals have been partly informed by Plymouth City Council's policies for the South Yard Character Area (*Devonport Characterisation Study and Management Proposals*, page 116). Those policies include:

1. Encourage the retention and reuse of buildings identified as making a positive contribution to the townscape, including those identified as being at risk.
2. Ensure that new developments within historic character areas reflect and respect that character.
3. Retain the historic road surfaces, including railway tracks.
4. Retain and enhance panoramic and key views throughout the Dockyard, in particular visual connections between clusters of historic buildings. Ensure that the surrounding areas are not adversely affected by the introduction of further huge modern warehouses that are prevalent in this area.
5. Subject to sensitivities within South Yard, explore opportunities to release the area of the 'visitor centre' allowing public access to this area.

The proposals have also been assessed in relation to *PPS5 Planning for the Historic Environment* (2010), the accompanying *Historic Environment Practice Guide* (March 2010), and English Heritage's *Conservation Principles* (2008).

1 Yacht production facility

The overall scale of the proposed three-phase building is out of character with South Yard, unlike North Yard which contains larger industrial buildings, and it fails to make a "positive contribution to the character and local distinctiveness of the historic environment" (*PPS5 HE7.5*). Moreover, it would adversely affect designated and other heritage assets in South Yard. The height of the building is contrary to the *Devonport Characterisation Study and Management Proposals* policy "Ensure that the surrounding areas are not adversely affected by the introduction of further huge modern warehouses that are prevalent in this area" (page 116). Although an exception could be justified if this enabled boat building to continue in the yard, the combined effect of all three phases impacts negatively on surrounding heritage assets, poses threats to the archaeological record, and would entail the demolition of one undesignated asset of some significance (building S173) and the highly significant early twentieth century extension of No 3 Slip.

SETTING

The proposal does not respect Plymouth City Council's key policy for the South Yard Character Area to "retain and enhance panoramic and key views throughout the Dockyard, in particular visual connections between clusters of historic buildings" (*Devonport Characterisation Study and Management Proposals*, page 116).

The proposal would adversely affect the setting of the following designated assets immediately bordering the site:

- 3 scheduled monuments:
West Ropery, No. 1 Covered Slip, and Scrieve Board;
- 1 grade 1 listed building:
East Ropery/Spinning House;
- 3 grade II* listed buildings:
Gazebo, South Smithery and South Sawmills;
- 5 grade II listed buildings:
Master Ropemaker's House, Joiner's Shop, Master Ropemaker's Office, Rose Cottage, and Composite Shipbuilding Shed.

This three-phase development would affect the immediate setting of three scheduled monuments, one grade I, three grade II* and five grade II listed buildings. The two highly-graded listed buildings most adversely affected would be the grade I East Ropery/Spinning House and the grade II* Gazebo. The proposed building would have a harmful impact on the setting of the listed buildings which the local planning authority should have special regard to preserve (Planning (Listed Buildings and Conservation Areas) Act 1990 sections 16(2) and 66(1)). The design is bland and the choice of colours would do little to mitigate the effect of its huge scale. The proposal neither "makes a positive contribution to" nor "better reveals the significance of the asset" and because of the negative impact would require significant benefits to justify the proposal (*PPS5 HE10.1*).

East Ropery The 247m long East Ropery is currently vacant but it has long been promoted as the location for a visitor centre or dockyard museum following Plymouth City Council's policy to "explore opportunities to release the area of the 'visitor centre' allowing public access to this area" (*Devonport Characterisation Study and Management Proposals*, page 116). The East Ropery has dominated the eastern perimeter of South Yard since its construction in the 1760s, and currently enjoys inter-visibility with all the other designated assets on the perimeter of the Princess Yachts site. However, all views west across the yard would be obscured by the proposed 250m long and 25m high building immediately south of the remains of the scheduled West Ropery (ADG drawing 08676_SD 40A sections AA & BB). Notwithstanding the fact that the East Ropery stands on higher ground by some 6 or 7m, the proposed production facility (which would extend the full length of the upstanding building) would exceed the height of the parapet of the East Ropery by about 9m as can be seen in the section on drawing ADG drawing 08676_SD 40A section AA & BB (contrary to the impression given by ADG drawing 08676_SD 54 A). Despite following the linear grain of the site,

the three-phase proposal would have a harmful impact on the setting and on the significance of the designated East Ropery due to its massive scale. It fails to meet the tests required in *PPS5 HE9.4* to ensure the optimum viable use for the East and West Ropery as the proposal would damage the economic viability of the heritage assets both now and in the future thereby threatening their conservation by visually separating them from the rest of the dockyard and the waterfront (*Practice Guide* paragraph 120).

Gazebo The domestic-scaled Gazebo was built in 1822 in the Mount specifically as a viewing platform across the yard to commemorate George III's visit. Its significance would be adversely affected by the production facility as it would no longer command any view to the north because of the proximity of the 65m wide and 25m high south gable of the proposed production facility (ADG drawing 08676_SD 40A section CC, *PPS5 HE10.1*). Again, the proposal fails to satisfy the tests required in *PPS5 HE9.4*.

South Smithery and South Sawmills Both assets are grade II* and lie immediately to the west of the Princess Yachts fenced site. Neither building is required by the Ministry of Defence. Both are vacant and in need of repair, and are on the English Heritage buildings at Risk Register. The proposal does not respect Plymouth City Council's policies for the South Yard Character Area to "Encourage the retention and reuse of buildings identified as making a positive contribution to the townscape, including those identified as being at risk" (*Devonport Characterisation Study and Management Proposals*, page 116). *PPS5* requires local authorities to "monitor the impact of their planning policies and decisions on the historic environment", paying "particular attention to the degree to which ... heritage assets are at risk of loss or decay" and how this is expected to change over time (HE5). The South Smithery and South Sawmills would be overshadowed by the proposed 25m tall three-phase facility development which is unlikely to enhance their future marketability and bring them into viable use.

TREES

The submitted ADG drawing 08676_DS 01R shows a proposal for a line of 36 trees on the north and west perimeter of the Princess Yachts site. This plan is annotated "Provide formal tree avenue to boundary of facility (approx 10m centres) to help break up some of visual impact of the main production building on approach, protecting to some degree the setting of the retained listed buildings to the south and amenity of main retained streets." However, the proposal could never effectively break up the impact of the 25m tall three-phase development. Furthermore, as trees are alien to this part of the dockyard it would be impossible for them to protect the setting of the adjacent industrial listed buildings which include the grade II* buildings at risk South Sawmills and South Smithery.

(Note: These have subsequently been identified as light standards, not trees)

FLOOD RISK ASSESSMENT

Although it not made clear on any of the design drawings, the submitted AECOM "Flood Risk Assessment" indicates that, despite the risk of flooding being considered minimal, the floor level of the buildings should be set above the existing ground level. The main production facility is located outside the flood plain (in zone 1) and therefore minimal increase in height should be required, but the proposed Staff and Management Office located in flood zone 2 is recommended to be set approx 600mm above the existing ground level. The report appears to assume that the site level will be raised overall and we are concerned with the effect that this excessive level of intervention would have on the setting of the surrounding historic buildings and other heritage assets, including the historic railway lines set into the ground which are an important reminder of the previous use of the area and which contribute to the character of the area. Any wholesale raising of ground levels would also cause interface problems at the boundaries of the site, both at the various waterfronts and the fenced boundary. We strongly advise the levels across the site remain and the visible retention of the railway lines where outside the building's footprint, except immediately local to the new buildings where level access is necessary.

ARCHAEOLOGY

Some of the historic dockyard railway lines run across the Princess Yachts site and there are also likely to be buried remains of former railway lines and other historic surfacing. The significance of historic road surfaces, including railway tracks, and the desirability of retaining them, is recognised in Plymouth City Council's *Devonport Characterisation Study and Management Proposals*, page 116. The site is of archaeological interest because it also encompasses the former eighteenth-century Boat Pond, and the Inner Mast Pond which was filled with rubble from buildings demolished after World War II, as well as the former Outer Mast Pond, remains of which are expected to survive as buried archaeological features.

Sites having or suspected of having archaeological interest require a proper understanding (*PPS5 HE6.1, Practice Guide* paragraph 99). Five archaeological evaluation trenches revealed evidence of the Inner and Outer Mast Ponds, the latter only 0.55m below the surface, although there is little analysis of any exposed stratigraphy (recorded in the submitted AC Archaeology, "Archaeology and Cultural Heritage Assessment" reference AC123/2/0 (March 2010) page 15). The wall of the Boat Pond was not identified, but this need not suggest that the walls had been demolished, as lack of evidence may be due to inaccurate trench location perhaps resulting from errors in the historic cartographic record. Furthermore, the report contains no plans or sections of individual trenches, and only one oblique photograph of each trench. The archaeological appraisal should follow the guidance in the *Practice Guide paragraphs* 130-37. More extensive sample trenching would be required to document the survival of earlier surfaces and the configuration of the former ponds, building foundations and the retaining walls of the buried Mast Ponds and Boat Pond. The recording should include drawn plans and sections in order to assess what impact new buildings would have on the surviving archaeology. This should be accompanied by a detailed assessment of the impact on the below-ground archaeology of the

foundations required for the proposed new building, to incorporate bridging details where necessary to minimise their impact (*Practice Guide* paragraph 99(3)).

DEMOLITION

The positioning of phases 1, 2 and 3 has been predicated by the desire to retain the modern building S130 during the construction of phase 1 and to avoid a perceived constraint of a culvert at the north end of the site.

S173 It is proposed to commence construction at the south end, requiring the total demolition of warehouse building S173 at the foot of the Gazebo mound which was constructed in 1903. However PPS5 HE1.1 encourages the re-use of heritage assets to avoid material and energy costs of new development. Furthermore, S173 could fulfil a valuable role of a buffer between the domestically-scaled grade II* Gazebo, and the new facility, a point which was also emphasised by the Plymouth Design Panel meeting to discuss the pre-application proposals on 3 February 2010. Retention of this asset would respect the Plymouth City Council policy to reuse buildings making a positive contribution to the townscape (*Devonport Characterisation Study and Management Proposals* page 116). The submitted "Archaeology and Cultural Heritage Assessment" includes a very brief description of the building and 12 photographs, but no measured drawings (e.g. of the roof structure). Total demolition of a heritage asset should require building recording to at least level 3 in English Heritage, *Understanding Historic Buildings, A guide to Good Recording Practice* (2006) pages 14 & 16.

No. 3 Slip The footprint of the proposed production facility as proposed would also entail the demolition of the early C20 raised head of No. 3 Slip. This is a most serious loss of a heritage asset, and the effect on its significance is a material consideration in determining the application (PS5 HE8.1). No. 3 Slip, building S173 and the Shallow Dock, have historical value in illustrating the early twentieth-century expansion of the naval dockyard in the immediate build-up to the First World War, while No. 3 Slip is an heritage asset of exceptional significance. It originated as a late eighteenth-century slip. Before 1911 the incline was extended above ground with granite steps to 752ft (229m) making it the largest surviving slip in a Royal Dockyard. It was specifically designed to accommodate the construction of Dreadnoughts, four of which were built between 1911 and 1914 and were deployed in World War I. These include the *Royal Oak* which saw active service in both World Wars but which was sunk by the German U-boat *U47* on 14 October 1939 and survives as a war grave in Scapa Flow. The concrete piers positioned on the perimeter appear to be World War II additions.

English Heritage's *Conservation Principles* (2008) contains policies and guidance for the sustainable management of the historic environment. It includes a methodology for understanding the significance of heritage assets by analysing their values (pages 27-32). No. 3 Slip has evidential value in terms of revealing information about past activity in constructing the Dreadnoughts. Its also has historical value in being illustrative of a particular period of the nation's history principally as a contributing to the increase in Britain's naval re-armament before World War I. It has aesthetic value

in that its physical fabric and form reinforces the overall historic character of the area, and it also forms a group with the Shallow Dock and building S173. It may also have communal value for the local community as well as specifically commemorative value for the relatives of those lost on the *Royal Oak*. No. 3 Slip has not been tested to see if it meets criteria for statutory designation, but it is undoubtedly a heritage asset of considerable significance.

The submitted "Archaeology and Cultural Heritage Assessment" page 3 states "In 1911, one of the main changes on the site was that No. 3 slip was extended to enable the manufacture of dreadnought warships, thus resulting in the removal of the boat pond and the inner and outer mast ponds". This both disregards the significance of the extension, and also confuses pond infilling with removal. The text and photographs on pages 13 and 14 confuse pre-and post 1911 building phases. There is an obligation on behalf of the local authority to ensure a high level of building recording in the case of the proposed total demolition of the most significant phase of the slip. This should provide a thorough acknowledgement of the slip's significance and the impact the development would have regarding demolition and the junction with the eighteenth century work (*PPS5 HE6.1, HE12.3, Practice Guide* paragraph 68, English Heritage, *Conservation Principles* (2008)). In this instance total demolition of the significant phase heritage asset would warrant building recording to at least level 4 in English Heritage, *Understanding Historic Buildings, A guide to Good Recording Practice* (2006) pages 14 & 16.

2 Test tank

The proposed new cover building to the shallow dock to provide a covered test tank facility is an elegant design which need not detract from the adjacent listed and scheduled No. 1 Covered Slip, provided materials and finishes are carefully selected. We would encourage further development to enable part of the wind board to No. 1 Covered Slip to be removed, especially at the north end to better express the relationship between the two structures in the expectation that No. 1 Covered Slip will eventually be publicly accessible (*Devonport Characterisation Study and Management Proposals*, page 116).

3 Staff and Management Office

New development should make a positive contribution to the character and local distinctiveness of the historic environment (*PPS5 HE7.5*). The proposed Sales & Management Office is less sympathetic to its context than the proposed adjacent new cover building to the Shallow Dock. It does not draw on any historic references, nor does it have a good relationship with the proposed cover building, and it introduces a style which as drawn looks unresolved. While there is no objection in principle to a new building on the wharf, its design and relationship with its surroundings would require more careful thought for it to be acceptable.

English Heritage conclude by recommending that this application is refused.

Queen's Harbour Master (QHM) :- The shore side development of the production facility, office building and Shallow Dock Test Facility do not

impinge on the safety of navigation within the Hamoaze and QHM has no objection on the grounds of navigation safety. The on water pontoon jetty facility should be constructed in such a way that it is robust enough to work through the full tidal range from lowest astronomical to highest astronomical tide and have a safety factor that allows for tidal surges due to low pressure weather systems increasing the height of tide over the predicted maximum. The Shallow Dock Test Tank should be lit in such a way that no lights are directed onto the water where they could reduce the night vision of mariners and compromise the safety of navigation of vessels. The Lighting Report produced by AECOM would suggest that there is sufficient shielding incorporated in the design but QHM reserves the right to request further measures to be taken if it becomes apparent that the lighting scheme is detracting from the safety of navigation by vessels using the Hamoaze.

Health & Safety Executive (Nuclear Directorate):- There is no objection on nuclear safety grounds to this development; this decision is made without prejudice to the interests of other branches of the Health and Safety Executive.

South West Water:- There are no objections to the proposal subject to all surface water connections to the public sewer being removed where possible. It should also be noted that public sewers and a pumping station lie within part of the site, and that this has been made known to consultants acting for the applicant together with our requirements.

Plymouth Design Panel:- These are the latest comments from the Plymouth Design Panel, made at a special meeting held in January prior to their disbanding. They relate to a slightly earlier version of the proposal and are made without the benefit of a site visit:-

Site configuration:- In the discussion it became clear that the constraint imposed by the culvert and pumping station to the northwest of the site is a major factor for the phasing and the justification for the proposed demolition of the relay building. The panel believes a legitimate question remains as to whether the cost of relocating the culvert is outweighed by the value of retaining the relay building (which the panel believes offers an appropriate buffer to the cluster of historic buildings south and east) and the value ultimately of optimising the development opportunity of the site as a whole. The panel also noted that since the phasing commences at the south eastern end and with the demolition of the relay building, should the 2nd and 3rd phases of development not proceed, potentially the building would be lost unnecessarily. The panel would hope that the designers could work with English Heritage on the challenges of retaining or minimising the impact on no.3 Slip.

Architectural Expression:- The concern, as raised at the previous review, is that the main manufacturing building should not be apologetic about its size, the scale of the building needs to be celebrated; the achievement of large spans for the business of boat manufacture should be expressed rather than cloaked in an unremarkable skin.

The panel felt there was an opportunity for the building to reflect the quality of the product being manufactured inside; not by lavish materials or exotic form but by demonstrating the engineering, a quality of design and functionality which would reflect the legacy of the historic, maritime and industrial buildings on the site. Currently there is little to distinguish the proposal from a typical warehouse next to a motorway.

The panel was very encouraged by the plans to include sustainable measures for aspects of the environmental design. However, there was a concern that the integration of services, the strategy for energy generation, water harvesting, ventilation and day-lighting were some way behind the development of the building 'envelope'. These should inform the character, articulate the building and generate the structural solutions. For example, the vast manufacturing space is to be air conditioned- how is plant integrated? How will natural ventilation to the ancillary functions on the rear service spine be achieved? Are there areas where dedicated fume extraction is required? Could day lighting be achieved more effectively through a more expressive roof structure using north lights? Can provision be made now for the future incorporation of solar or water collection on such an expansive roof? The 100203 PDRP report PY final 3 quality of the environment for workers and the value this has in relation to retention of a skilled workforce was noted. The panel also raised an issue relating to the sensitive elevation facing the roperies and how the façade would respond both to the internal functions- given the varying demands for openings for plant/storage and staff facilities- and to the rhythms and regularity of the ropery elevations.

The choice of materials and detailing should be mindful of the implications for phasing e.g. the matching of finishes and robustness of the detailing. The panel did not express any particular views on the Testing Tank other than the importance of the boundary treatment relative to the Slipway no.1 affording a view into the activity on the site and that the quality of the materials and detailing of both the structure and boundaries should be very high in this very sensitive location.

For the whole scheme, the panel thought it very important that the testing of key views to the docks was undertaken; it was noted that views from Mount Edgcumbe and the Stonehouse Peninsula would be essential in assessing the impact of the development.

The panel is pleased to see a proposal which offers continuity of boat building in the South Yard but asks the applicant to consider the comments it has noted in respect of the site configuration relative to historic assets, the architectural expression / engineering of the main manufacturing building and to address the sustainability and legacy issues raised in order to make the most of this unique and exciting opportunity.

Representations

The site is located in the enclosed military dockyard and, apart from the waterfront, onto the Hamoaze, its only neighbour is the MOD. Given the size

of the proposed development and its impact upon the historic dockyard press and site notices have been posed. This has resulted in receipt of six letters of representation (LOR's) including letters from the Naval Dockyards Society and The Georgian Group:-

Naval Dockyards Society (NDS):- Very much welcomes in principle the revival of shipbuilding in the South yard but have a number of serious concerns regarding the visual impact upon the historic buildings; damage the setting if historic buildings curtail long established vistas in the heart of the yard. The proposal would visually sever the ropery complex from other historic buildings in the south yard.

This development will wholly negate this sense of place by isolating the 17th and 18th century buildings from each other and curtailing their future as an integrated group of buildings. The raised head has intangible association with history

In summation, the cited documentation suggests that the historic buildings of South Yard will be threatened irrevocably by additional activities which are not clarified within the Planning Application documents, in particular

- Threats of physical damage to the historic buildings
- Unqualified loss of the west ropery
- Destruction of historic vistas
- Destruction of assemblage and sense of place
- Permanent loss to the public of the Ropery Complex and Gazebo
- Loss of integrated historic group value by isolating buildings and threatening future physical damage to the historic built environment

The NDS therefore encourages the Planning Authority to do all it can to mitigate the impact of these huge buildings upon the setting and their surroundings, and to secure the future of the adjacent historic buildings and calls for

1. Consideration of the NDS suggestion to reverse the 3 phases
2. assured and specified means of physically protecting the historic buildings surrounding the PY site
3. Clarification of the future of the Ropery Complex, Gazebo, Covered Slip and Mutton Cove Gate
4. assured and specified access to the historic buildings by museum and historical groups to guarantee future interpretation of the tangible and intangible heritage of South Yard through guaranteed specified Access tours and research

The Georgian Group:- Express concern regarding the impact of the proposed development on the existing heritage assets, particularly those dating from the eighteenth and early nineteenth century.

The Group Fully supports the concerns expressed by English Heritage and advises that the proposals do not respect the historic scale or character of the Dockyard site. The Group would expect any scheme for new works on this site to respect the existing heritage assets.

The Group considers that the scale and materials of the proposed structures would detract from the historic character of the site. The failure of the proposal to seek re-use of existing redundant Grade II* buildings is also to be condemned. Therefore the Group advises that this application is refused consent.

The views of the other four letters can be summarised as follows:-

- Isolating heritage It appears that Princes Yachts will be isolating much of the heritage of south yard from public view and destroying much of Devonport and Plymouth's history. Many of the buildings are listed within the area, or of historic interest especially the slipway where many of this country's great and historic ships were built.
- Public access:- We believe the visual prospective of this application is out of character with the unique setting of Historic South Yard. We wish to point out to the planning committee that there is a possibility that a large portion of the historic listed buildings will become off-limits to the general public, including the ropery complex, when land and further areas of land are fenced off for exclusive use of the applicant. We would like the plans re-submitted to take into consideration visual aspects of the site in relation to the 300 years + old dockyard and that public access is still possible, as has always been the case during the dockyard's long history. The public have always been welcomed into South Yard.
- Resource for young people:- Remember the young people of the area by keeping open the heritage site. Its an ideal place of local, military and naval history for schools, youth groups etc which will arouse the gifts and talents of youngsters.
- Prospect of maritime museum lost:- These unique historic buildings are currently fenced off, and withdrawn from public observation, and once transferred to princes Yachts which I believe is the MOD's intensions; it will mean that those wish at some time in the future to see them say as a Maritime Museum along similar lines to what Chatham and Portsmouth have done, simply won't be able to top which I believe is against the public's interest, and for this reason should be moved into the public domain at the earliest opportunity.

Analysis

Human Rights Act - The development has been assessed against the provisions of the Human Rights Act, and in particular Article 1 of the First Protocol and Article 8 of the Act itself. This Act gives further effect to the rights included in the European Convention on Human Rights. In arriving at this recommendation, due regard has been given to the applicant's reasonable development rights and expectations which have been balanced and weighed against the wider community interests, as expressed through third party interests / the Development Plan and Central Government Guidance.

The key issues in this case are:-

- The principle of developing a new manufacturing facility, B1 and B2 uses on this site. (Policies CS04, CS05 and CS20 of the Core Strategy)

- The appearance of the proposed development and impact upon strategic views (Policies CS02 and CS34 of the Core Strategy)
- The impact upon the historic environment, including listed buildings (Policy CS03 of the Core Strategy)
- Community Benefits arising from the proposed development (Policy CS33 of the Core Strategy)
- Access and parking issues (Policies CS28 and CS34 of the Core Strategy)

The principle of developing a new manufacturing facility, B1 and B2 uses on this site.

The South Yard has been used for shipbuilding since it was first developed in the seventeenth century, as evidenced by the wealth of historic buildings and structures that surround the site. It has for generations been used by the military with restricted access. Since the end of the cold war successive naval reviews have resulted in a smaller navy culminating in the decision to open up the South Yard to non-military uses.

The proposal by Princess Yachts to expand their business continues the boatbuilding tradition secures/provides 200 additional jobs; 90 apprenticeships and helps create a climate in which investment in the remainder of the yard, including the many attractive listed buildings, becomes an attractive proposition. Crucially, in policy terms, it represents regeneration that retains and employment generating use, satisfying the core requirements of policies CS04 (Employment Provision) and CS05 (Development of Existing sites).

The site is located within the area covered by the Devonport Area Action Plan (AAP) whose key Objective 3 is :- *'To protect existing employment facilities , particularly those related to Devonport's marine industry , and provide additional employment development to meet the need for further local job opportunities for local people.'* Despite acknowledging that the area suffers from above average levels of unemployment and related low skill/ low wage levels it has proved difficult to attract investment in employment uses into the area or deliver genuine mixed use regeneration. This development proposal would go some way towards compensating for that weakness - especially if it acts as a catalyst for further employment uses on adjoining land.

The appearance of the proposed development & impact upon strategic views

The proposed sales and management office and shallow dock test tank cover would be the most attractive modern buildings built in the South Yard for over a century. They would improve the appearance of the waterfront and the covered No.1 slip when viewed from the Hamoaze and from Mount Edgecome. They fully satisfy the requirements of Policy CS02 (Design) and can be unreservedly welcomed.

The production facility building is more problematic. Despite the architect's best efforts to mitigate its' impact, it would be an extremely large shed whose gargantuan size and scale cannot really be hidden or disguised. It would

dwarf all other buildings in the vicinity and certainly be a conspicuous new feature of any future strategic view of the city from Mount Edgecome, the Hamoaze and even the glimpses available from Royal William Yard. But, like the frigate sheds, further up the Tamar, its' size is a function of its' purpose. In this case the purpose is streamlining the production of very large, luxury, motor yachts. A smaller shed, simply would not provide the same economies of scale.

The character of a working dockyard is one where extraordinary sights, unfamiliar and changing juxtapositions between ships, land based equipment and exceptionally large one off buildings, are the norm, not the exception. The production facility building continues that rugged waterfront tradition and will, in time, become part of the accepted panorama of a working dockyard.

The impact upon the historic environment, including listed buildings

The proposed development will have an adverse affect upon important historic assets - particularly listed buildings. The three phase manufacturing building is a behemoth, whose scale cannot be disguised or much mitigated (245m x 63m x 25m). No amount of colour banding or superficial external treatment can adequately mitigate for the shape, size and scale of the three phase manufacturing building. They are fundamental to the nature of the proposal. But it is the massive internal cranes that it is designed to contain that dictate its' shape and leave little scope for architectural embellishment. What can be achieved, in terms of stratified bands of windows and coloured panels has been incorporated into the elevation details.

However, it is only the settings of the historic protected assets that would be affected - not the intrinsic assets. The historic assets within the site, Building S173 and the raised head, are not protected and are either of limited, or narrowly specialist, value. It is appreciated that the site forms part of a working dockyard and was previously covered by utilitarian post war sheds, built by the navy under Crown exemption. It was not part of a pristine eighteenth Century environment, but the void in the centre created by long filled in mast ponds and bombed buildings.

Requiring retention of No.3 slip in its entirety would be a significant impediment to the development of this site. Its retention would seriously impede movement around the site for employees, their vehicles and the mobile boat hoists that will be used to manoeuvre the yachts. It may be a rare remnant of imperial glory, but its appearance is as a raised concrete platform of little intrinsic merit, to all except naval architecture specialists. It is not protected, and its retention would simply result in it being a persistent nuisance to those who are forced to work around it.

The roof of warehouse building (S0173) is located immediately to the west of the gazebo. The corrugated roof has dominated foreground views from the gazebo for over a century. Beyond this building functional metal sheds, erected by the military have been the main aspect from this viewing platform. The historic view has been degraded to the point where they are of very limited value.

Building S173 is early twentieth century structure. It is, as the Devonport Characterisation study acknowledges, pleasant. The applicant has investigated its retention and re-use, but finds it severely compromises the design layout. The case for requiring its retention and re-use is not considered to be sufficient to risk jeopardising the overall development proposal.

Levels are to be raised to meet the Environment Agency's (EA) requirements. The applicants are discussing with the EA to see whether this is really necessary. The scale of the development is such that across the development this will be difficult to detect.

Conditions to require archaeological investigation can, and should be, imposed upon any planning permission. This is not a reason for refusal.

Community Benefits arising from the proposed development

Policy CS33 (Community Benefits / Planning Obligations) of the Core Strategy, supplemented by the Planning Obligations and Affordable Housing SPD provides the policy framework for consideration of the community benefits delivered by the development proposal. It states:-

'Where needs arise directly as a result of development, the Council will seek to secure planning obligations or agreements pursuant to Section 106 of the Town and Country Planning Act 1990 that make a positive contribution to creating a city of sustainable linked communities.

Through such obligations and agreements, the Council will seek to ensure that development proposals: Meet the reasonable cost of new infrastructure made necessary by the proposal, including transport, utilities, education, community facilities, health, leisure and waste management.'

Specific community benefits arising from the proposal are limited. Under the provisions of the current Market Recovery Measures, in place until March 2011 to stimulate investment during the current economic crisis, commercial development of the kind proposed is exempt from payment of the Plymouth Development Tariff, as set out in the Planning Obligations and Affordable Housing SPD.

However, the applicants have agreed to provide 90 new apprenticeships (30 associated with the implementation of each phase of the production facility). Whilst there is no restriction on the area from which these apprentices can be recruited, the likelihood is that most will come from the wider local area - providing a welcome boost to training and employment in Devonport.

Access and parking issues

The site is relatively compact and quite self contained. Once behind the secure perimeter of the dockyard wall, it is unlikely that any activities, including staff parking, would spill out into the neighbouring area. Adequate on site parking and delivery facilities are proposed within the site.

Vehicular and pedestrian access to the site is currently, and for the foreseeable future, restricted to the secure Granby Gate - and bridge link to the North Yard. Granby Gate is accessed off Granby Way 'one way' system

which, in turn, is accessed from Park Avenue and the A374, to the east. The proposal will result in some increase in traffic on the surrounding road network which is likely to be particularly noticeable to the new houses built on the Southern side of Granby Green as part of the Vision site, but it is unlikely to equal the historic levels associated with the dockyard use in its' military heyday.

Travel Plan arrangements are proposed, secured by Section 106 legal agreement, to mitigate the impact of the development upon the surrounding road network and encourage modal shift in travel to work patterns away from single occupancy private vehicle to more sustainable modes: walking, cycling, public transport and car share.

Subject to approval and implementation of a satisfactory Travel Plan and conditions relating to parking cycle stores etc. the proposal is considered to meet the requirements of Policies CS28 (Local Transport Consideration) and CS34 (Planning Application Considerations) of the Core Strategy.

Equalities & Diversities issues

The applicants architect has amended the Design and Access statement to demonstrate that the site and buildings will be accessible to people with disabilities.

Inequality is such that there is little chance that most people would in the whole of their lives ever be able to afford to buy one of the luxury motor yachts built by Princess Yachts. There is a certainty that, if they did, their fuel consumption would rapidly exhaust the world's remaining supplies of fossil fuels and contribute to climate change leading to large parts of the planet becoming uninhabitable. They are inherently unsustainable and it is questionable as to whether facilities to encourage their manufacture are contrary to Policies CS01 (Sustainable Communities) and Policy CS20 (Resource Use). But, they provide jobs, develop skills and contribute to diversity.

Section 106 Obligations

- The provision of 90 new apprenticeships (30 associated with the development of each phase of the manufacturing building).
- A Travel Plan with associated £78,765.00 fund (collected in three phases of £26,255.00 linked to the three phases of the main manufacturing building) managed by Princess Yachts to promote sustainable transport.
- Management Fee (£60,000.00, rate capped figure)
- Delegated authority to officers to refuse the application within 3 months of resolution if the legal agreement remains unsigned.

Conclusions

It is possible to envisage a different future for the site involving a scale of development that is more sympathetic to the surrounding historic buildings and that introduces a greater degree of permeability and public access. But, the likelihood of this occurring and it delivering employment led regeneration,

not just a built environment that is physically more compatible with the surrounding historic assets, needs to be weighed carefully.

Devonport is some distance from the city centre and has struggled to attract investment, even with significant public sector pump priming from Devonport Regeneration Community Partnership (DRCP) and Homes and Communities Agency (HCA). The chances of a large number of small marine engineering firms taking on the extra cost involved with the renovation of the listed buildings, or a major investor coming forward to deliver a naval visitor centre, are slim. The area has a large number of important heritage assets that it struggles to preserve such as Devonport Guildhall, Devonport Market Hall, St Aubyns Church; Raglan Barracks Gatehouse and, slightly further away, The Palace Theatre.

If Core Strategy policy CS05 (Development of existing [employment] sites) considerations are put aside – and in relation to marine employment sites, that is a big assumption - residential development, conversion and/or new build, might be more commercially viable in the long term. But this has its own problems. The site, and immediate surrounding area, has restricted / controlled access, suggesting an enclave, or gated, community, and additional residential in the southern part of the city, at the expense of employment uses, reinforces the north south split, increasing the work commute over the A38 to the north, and putting additional pressure on the A386. Furthermore, evidence suggests private sector demand for more waterfront apartments is currently quite flat. So, whilst English Heritage's objections could be cited to provide justification for a refusal of the application on the grounds that it is incompatible with the historic assets, there is no guarantee that a more compatible development proposal will come along in the foreseeable future - and it might not materialise at all.

The current proposal offers the City concrete, realisable, assets. It anchors Princess Yachts, a local marine engineering company, more firmly in the city. Marine industries are one of six priority growth sectors identified in the Core Strategy. It represents significant private sector investment that helps maintain economic diversity in a city that is particularly dependent on public sector and more vulnerable than many others to public spending cuts. The footloose nature of firms is often overplayed, particularly by firms wanting to obtain planning permission - in reality hard assets and soft networks make it difficult to relocate abroad - but the impact on economic and physical regeneration in the area, including the impact on deprived areas and social inclusion objectives, and impact on local employment are factors to take into account as the pros and cons of the application are considered.

On balance, your officers consider that the economic and regeneration advantages arising from this proposal outweigh the acknowledged harm to historic assets and that conditional permission subject to a Section 106 legal agreement should be granted.

Recommendation

In respect of the application dated **26/04/2010** and the submitted drawings, **08676_EX01D; 08676_EX02; 08676_EX03; 08676_EX04; 08676_EX05; 08676_EX06; 08676_EX07; 8676_EX08B; 088676EX09; 08676EX10; 08676_EX11; 08676_EX12; 8676_EX13; 08676_EX14; 08676_EX15; 08676_EX16; 08676_EX17; 08676_SD01R; 08676_SD02E; 08676_SD03D; 08676_SD04D; 08676_SD05B; 08676_SD06D; 08676_SD07A; 08676_SD08D; 08676_SD09C; 08676_SD20E; 08676_SD21D; 08676_SD22B; 08676_SD23E; 08676_SD25; 08676_SD30D; 08676_SD31B; 08676_SD32B; 08676_SD33A; 08676_SD34A; 08676_SD40A; 08676_SD41B; 08676_SD50; 08676_SD51; 08676_SD52; 08676_SD53; 08676_SD54; 08676_SD55; 60095684/D/001Rev.P1** , it is recommended to: **Grant conditionally subject to S106 Obligation, Delegated authority to refuse if S106 not signed within 3 months of the committee date**

Conditions

DEVELOPMENT TO COMMENCE WITHIN 3 YEARS

(1) The development hereby permitted shall be begun before the expiration of three years beginning from the date of this permission.

Reason:

To comply with Section 51 of the Planning & Compulsory Purchase Act 2004.

EXTERNAL MATERIALS

(2) No development shall take place until samples of the materials to be used in the construction of the external surfaces of the development hereby permitted have been submitted to and approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the approved details.

Reason:

To ensure that the materials used are in keeping with the character of the area in accordance with Policy CS34 of the Plymouth Local Development Framework Core Strategy (2006-2021) 2007.

SURFACING MATERIALS

(3) No development shall take place until details of all surfacing materials to be used have been submitted to and approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the approved details.

Reason:

To ensure that the materials used are in keeping with the character of the area in accordance with Policy CS34 of the Plymouth Local Development Framework Core Strategy (2006-2021) 2007.

LANDSCAPE DESIGN PROPOSALS

(4) No development shall take place until full details of both hard and soft landscape works and a programme for their implementation have been submitted to and approved in writing by the Local Planning Authority and these works shall be carried out as approved. These details shall include .

Reason:

To ensure that satisfactory landscaping works are carried out in accordance with Policies CS18 and CS34 of the Plymouth Local Development Framework Core Strategy (2006-2021) 2007.

LANDSCAPE WORKS IMPLEMENTATION

(5) All hard and soft landscape works shall be carried out in accordance with the approved details. The works shall be carried out prior to the occupation of any part of the development or in accordance with the programme agreed with the Local Planning Authority.

Reason:

To ensure that satisfactory landscaping works are carried out in accordance with Policies CS18 and CS34 of the Plymouth Local Development Framework Core Strategy (2006-2021) 2007.

EXTERNAL LIGHTING SCHEME

(6) Before the development hereby approved commences details of any external lighting scheme shall be submitted to and approved in writing by the Local Planning Authority. The lighting scheme shall be fully implemented before the development is first occupied and henceforth permanently maintained for the occupiers of the site.

Reason:

In order to ensure that adequate external lighting is provided for future occupiers of the site and that it does not interfere with navigation, to comply with policy CS34 of the Plymouth Local Development Framework Core Strategy (2006-2021) 2007.

ON SITE RENEWABLE ENERGY

(7) Prior to the commencement of any development, a report identifying how a minimum of 15% of the development's total predicted carbon emissions for the period 2010-16 will be off-set by on-site renewable energy production methods that shall be implemented on site, shall be submitted to and agreed in writing by the Local Planning Authority. For the avoidance of doubt, the predicted carbon savings which result from this shall be above and beyond what is required to comply with Part L of the Building Regulations.

Unless otherwise agreed in writing, the approved on-site renewable energy production methods shall be provided and thereafter retained and used for energy supply for so long as the development remains in existence.

The proposed solution should be considered in light of any emerging plans for a district energy network for the Devonport area, and where technically feasible the solution should allow for connection to this network.

If such requirements are to be provided by means of a biomass boiler, in full or part, the submitted report shall also demonstrate that the boiler will be used, a commitment to maintain the boiler and details of how a long term fuel supply can be secured and delivered.

Reason:

To comply with Policy CS20 of the Plymouth Local Development Framework Core Strategy (2006-2021) 2007 and in accordance with Government advice contained within PPS22.

CODE OF PRACTICE DURING CONSTRUCTION

(8) Prior to the commencement of the development hereby approved, a detailed management plan for the construction phase of the development shall be submitted to and approved in writing by the Local Planning Authority. The development shall be constructed in accordance with the management plan.

Reason:

To protect the residential and general amenity of the area from any harmfully polluting effects during construction works and avoid conflict with Policy CS22 of the Plymouth Local Development Framework Core Strategy (2006-2021) 2007.

LAND QUALITY

(9) Unless otherwise agreed by the Local Planning Authority, development other than that required to be carried out as part of an approved scheme of remediation must not commence until conditions 10 to 12 have been complied with. If unexpected contamination is found after development has begun, development must be halted on that part of the site affected by the unexpected contamination to the extent specified by the Local Planning Authority in writing until condition 13 has been complied with in relation to that contamination.

Reason:

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors, in accordance with policy CS34 of the Plymouth Local Development Framework Core Strategy (2006-2021) 2007.

SITE CHARACTERISATION

(10) An investigation and risk assessment, in addition to any assessment provided with the planning application, must be completed in accordance with a scheme to assess the nature and extent of any contamination on the site, whether or not it originates on the site. The contents of the scheme are subject to the approval in writing of the Local Planning Authority. The investigation and risk assessment must be undertaken by competent persons and a written report of the findings must be produced. The written report is

subject to the approval in writing of the Local Planning Authority. The report of the findings must include:

(i) a survey of the extent, scale and nature of contamination;

(ii) an assessment of the potential risks to:

- human health,
- property (existing or proposed) including buildings, crops, livestock, pets, woodland and service lines and pipes,
- adjoining land,
- groundwaters and surface waters,
- ecological systems,
- archeological sites and ancient monuments;

(iii) an appraisal of remedial options, and proposal of the preferred option(s).

This must be conducted in accordance with DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.

Reason:

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors, in accordance with policy CS34 of the Plymouth Local Development Framework Core Strategy (2006-2021) 2007.

SUBMISSION OF REMEDIATION SCHEME

(11) A detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment must be prepared, and is subject to the approval in writing of the Local Planning Authority. The scheme must include all works to be undertaken, proposed remediation objectives and remediation criteria, timetable of works and site management procedures. The scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

Reason:

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors, in accordance with policy CS34 of the Plymouth Local Development Framework Core Strategy (2006-2021) 2007.

IMPLEMENTATION OF APPROVED REMEDIATION SCHEME

(12) The approved remediation scheme must be carried out in accordance with its terms prior to the commencement of development other than that required to carry out remediation, unless otherwise agreed in writing by the Local Planning Authority. The Local Planning Authority must be given two weeks written notification of commencement of the remediation scheme works.

Following completion of measures identified in the approved remediation scheme, a verification report (referred to in PPS23 as a validation report) that demonstrates the effectiveness of the remediation carried out must be produced, and is subject to the approval in writing of the Local Planning Authority.

Reason:

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors, in accordance with policy CS34 of the Plymouth Local Development Framework Core Strategy (2006-2021) 2007.

REPORTING UNEXPECTED CONTAMINATION

(13) In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken in accordance with the requirements of condition 10, and where remediation is necessary a remediation scheme must be prepared in accordance with the requirements of condition 11, which is subject to the approval in writing of the Local Planning Authority.

Following completion of measures identified in the approved remediation scheme a verification report must be prepared, which is subject to the approval in writing of the Local Planning Authority in accordance with condition 12.

Reason:

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors, in accordance with policy CS34 of the Plymouth Local Development Framework Core Strategy (2006-2021) 2007.

NOISE MITIGATION SCHEME

(14) With the exception of the proposed office building, none of the new buildings /structures hereby approved, or the remaining existing buildings whose use is changed by this permission, shall be brought into use until a scheme for noise mitigation has been submitted to and approved in writing by the Local Planning Authority. The noise mitigation scheme shall ensure that noise levels associated with the use do not regularly exceed 5db above the current ambient baseline conditions and never exceed this figure between the hours of 8pm-8am at night, after 2pm on Saturdays and not at all on Sundays and public holidays.

Reason:

The proposed development represents and intensification of noise generating industrial activity on an unregulated historic site that has been relatively quiet for at least two decades. The Local Planning Authority wishes to ensure that

the proposed development does not result in an unacceptable level of noise disturbance to residential property in the wider area.

IMPLEMENTATION OF NOISE MITIGATION MEASURES

(15) The noise mitigation scheme (approved by condition 14) shall be fully carried out and in place before any of the new buildings / structures, with the exception of the proposed new office building, or any of the existing buildings whose use is changed by this permission, are first brought into use. The measures shall remain in place throughout the duration of the use, unless otherwise agreed in writing by the Local Planning Authority.

Reason:

To ensure implementation of the noise mitigation measures approved in condition 14.

ARCHAEOLOGICAL RECORDING

(16) No part of the development allowed by this permission shall be commenced until the applicant (or their agent or successors in title) has completed a programme of archaeological investigation and recording in accordance with a written scheme of investigation which has been submitted to, and agreed in writing by, the Local Planning Authority'.

Reason:

To ensure that the possible effects of the proposed development on the historic interest of the site are adequately provided for and that the details of the proposed work do not conflict with Policy CS03 of the Plymouth Local Development Framework Core Strategy (2006-2021) 2007.

RECORDING OF BUILDINGS & OTHER STRUCTURES

(17) No part of the development allowed by this permission shall be commenced until the applicant (or their agent or successors in title) has completed a programme of buildings recording in accordance with a written scheme of investigation which has been submitted to, and agreed in writing by, the Local Planning Authority'.

Reason:

To ensure that the possible effects of the proposed development on the historic interest of the site are adequately provided for and that the details of the proposed work do not conflict with Policy CS03 of the Plymouth Local Development Framework Core Strategy (2006-2021) 2007.

STREET DETAILS

(18) Development shall not begin until details of the design, layout, levels, gradients, materials and method of construction and drainage of all roads and footways forming part of the development have been submitted to and approved in writing by the Local Planning Authority. No phase shall be occupied until that part of the service road which provides access to it has been constructed in accordance with the approved details.

Reason:

To provide a road and footpath pattern that secures a safe and convenient environment and to a satisfactory standard in accordance with Policies CS28 and CS34 of the Plymouth Local Development Framework Core Strategy (2006-2021) 2007.

ACCESS (CONTRACTORS)

(19) Before any other works are commenced, an adequate road access for contractors with a proper standard of visibility shall be formed to the satisfaction of the Local Planning Authority and connected to the adjacent highway in a position and a manner to be agreed with the Local Planning Authority.

Reason:

To ensure an adequate road access at an early stage in the development in the interests of public safety, convenience and amenity in accordance with Policies CS28 and CS34 of the Plymouth Local Development Framework Core Strategy (2006-2021) 2007.

PEDESTRIAN/CYCLE ACCESS

(20) None of the three phases of the development shall not be occupied until a safe and continuous means of access for both pedestrians and cyclists has been constructed in accordance with details to be submitted to and approved in writing by the Local planning Authority.

Reason:

To ensure that an appropriate and safe access is provided in the interests of public safety, convenience and amenity in accordance with Policies CS28 and CS34 of the Plymouth Local Development Framework Core Strategy (2006-2021) 2007.

CAR PARKING PROVISION

(21) The development shall not be occupied until space has been laid out within the site in accordance with details previously submitted to and approved in writing by the Local Planning Authority for a maximum of 421 cars to be parked.

Reason:

In the opinion of the Local Planning Authority, although some provision needs to be made, the level of car parking provision should be limited in order to assist the promotion of sustainable travel choices in accordance with Policy CS28 of the Plymouth Local Development Framework Core Strategy (2006-2021) 2007.

CAR PARKING RESTRICTION

(22) No part of the site shall at any time be used for the parking of vehicles other than that part specifically shown for that purpose on the approved plan.

Reason:

In the opinion of the Local Planning Authority the level of car parking provision should be limited in order to assist the promotion of more sustainable travel

choices in accordance with Policy CS28 of the Plymouth Local Development Framework Core Strategy (2006-2021) 2007.

CYCLE PROVISION

(23) The development shall not be occupied until space has been laid out within the site in accordance with details previously submitted to and approved in writing by the Local Planning Authority) for 93 bicycles to be parked.

Reason:

In order to promote cycling as an alternative to the use of private cars in accordance with Policy CS28 of the Plymouth Local Development Framework Core Strategy (2006-2021) 2007.

CYCLE STORAGE

(24) The secure area for storing cycles shown on the approved plan shall remain available for its intended purpose and shall not be used for any other purpose without the prior consent of the Local Planning Authority.

Reason:

To ensure that there are secure storage facilities available for occupiers of or visitors to the building. in accordance with Policies CS28 and CS34 of the Plymouth Local Development Framework Core Strategy (2006-2021) 2007.

USE OF LOADING AREAS

(25) The land indicated on the approved plans for the loading and unloading of vehicles shall not be used for any other purposes unless an alternative and equivalent area of land within the curtilage of the site is provided for loading and unloading with the prior consent in writing of the Local Planning Authority.

Reason:

To ensure that space is available at all times to enable such vehicles to be loaded and unloaded off the public highway so as to avoid:- a. damage to amenity; b. prejudice to public safety and convenience, and c. interference with the free flow of traffic on the highway in accordance with Policies CS28 and CS34 of the Plymouth Local Development Framework Core Strategy (2006-2021) 2007.

TRAVEL PLAN

(26) The development hereby permitted shall not be occupied) until a Travel Plan (TP) has been submitted to and approved in writing by the Local Planning Authority. The said TP shall seek to encourage staff to use modes of transport other than the private car to get to and from the premises. It shall also include measures to control the use of the permitted car parking areas; arrangements for monitoring the use of provisions available through the operation of the TP; and the name, position and contact telephone number of the person responsible for its implementation. From the date of occupation of any of the 3 phases of development , the occupier shall operate the approved TP.

Reason:

In the opinion of the Local Planning Authority, such measures need to be taken in order to reduce reliance on the use of private cars (particularly single occupancy journeys) and to assist in the promotion of more sustainable travel choices in accordance with Policy CS28 of the Plymouth Local Development Framework Core Strategy (2006-2021) 2007.

CAR PARKING MANAGEMENT STRATEGY

(27) Prior to the occupation of any part of the site a Car Parking Management Strategy shall be submitted to and approved in writing by the Local Planning Authority. The said strategy shall provide information in respect of the phased release of car parking spaces along with details relating to the management and control of on-site car parking areas.

Reason:

To ensure that the use of on-site car parking is adequately controlled in order to support the aims and objectives of the Travel Plan in securing modal shift towards the use of sustainable modes of transport and hence reduce the number of single occupancy car journeys being made on the local highway network in accordance with Policy CS28 of the Plymouth Local Development Framework Core Strategy adopted April 2007.

VEHICLE ACCESS STRATEGY

(28) Prior to the occupation of the phase of development that it serves, details of the proposed traffic routes for each phase of the site shall be submitted to and approved in writing by the Local Planning Authority.

Reason:

To ensure that appropriate access routes are provided around the site whilst adjoining phases of development are under construction in the interests of highway and pedestrian safety, in accordance with Policy CS28 of the Plymouth Local Development Framework Core Strategy adopted April 2007.

INFORMATIVE: CONSTRUCTION OF PONTOON JETTY FACILITY

(1) The on water pontoon jetty facility should be constructed in such a way that it is robust enough to work through the full tidal range from lowest astronomical to highest astronomical tide and have a safety factor that allows for tidal surges due to low pressure weather systems increasing the height of tide over the predicted maximum.

INFORMATIVE: LIASON WITH ENVIRONMENT AGENCY

(2) Early Contractor liaison with the local Environment Agency Environment Officer (EO) should begin, preferably through a nominated Environmental Clerk of Works, as soon as the contract is awarded, and continue from the period of the construction phase. The EO should attend a pre-commencement meeting and be updated on the construction works programmed. This is to agree the principles of a Pollution prevention and Control plan and Site Waste Management Plans (SWMP). The pollution prevention planning for each phase should identify any critical operations where detailed method statements will need to be agreed. A pollution control

plan should cover deployment of drill and spill kits and including a drainage plan for close pollution control. It should cover staff training, provision of spill kits, audit routines and record keeping. For further advice the developers should refer to our Pollution prevention Guidelines, particularly PPG6 Working at construction and demolition sites, as well as PPG1, 5 and 14, which can be viewed via the following link:

<http://www.environment-agency.gov.uk/business/topics/pollution/39083.aspx>

INFORMATIVE: SOLVENT EMISSIONS DIRECTIVE

(3) You should consult Plymouth City Council on any permits or authorisations required under the local authority permitting regime, for example meeting the Solvent Emissions Directive or COMAH regulations.

INFORMATIVE: BIOMASS BOILER WOOD

(4) Environment Agency advise that only virgin untreated wood can be used in a biomass boiler unless it has abatement equipment fitted to make it Waste Incineration Directive Compliant.

INFORMATIVE: ADVERTISEMENT CONSENT REQUIRED

(5) Notwithstanding any indicative signs shown on submitted drawings the this planning permission does not provide any consent, tacit or otherwise, for the display of any adverts. A separate advertisement consent may be required prior to the display of advertisements at the site.

INFORMATIVE: CODE OF PRACTICE DURING CONSTRUCTION

(6) The management plan required by condition 8 shall be based upon the Council's Code of Practice for Construction and Demolition Sites which can be viewed on the Council's web-pages, and shall include sections on the following:

- a. Site management arrangements including site office, developer contact number in event of any construction/demolition related problems, and site security information;
- b. Construction traffic routes, timing of lorry movements, weight limitations on routes, initial inspection of roads to assess rate of wear and extent of repairs required at end of construction/demolition stage, wheel wash facilities, access points, hours of deliveries, numbers and types of vehicles, and construction traffic parking; and
- c. Hours of site operation, dust suppression measures, and noise limitation measures.

Statement of Reasons for Approval and Relevant Policies

Having regard to the main planning considerations, which in this case are considered to be:

- The principle of developing a new manufacturing facility, B1 and B2 uses on this site.
- The appearance of the proposed development
- The impact upon strategic views
- The impact upon the historic environment, including listed buildings
- Community Benefits arising from the proposed development

- Access and parking issues
- the proposal is not considered to be demonstrably harmful. In the absence of any other overriding considerations, and with the imposition of the specified conditions, the proposed development is acceptable and complies with (a) policies of the Plymouth Local Development Framework Core Strategy (2006-2021) 2007 and supporting Development Plan Documents and Supplementary Planning Documents (the status of these documents is set out within the City of Plymouth Local Development Scheme) and the Regional Spatial Strategy, and (b) relevant Government Policy Statements and Government Circulars, as follows:

PPG20 - Coastal Planning
PPG22 - Renewable Energy
PPG24 - Planning and Noise
PPG25 - Flood Risk
PPG4 - Industrial and Commercial Development
PPS1 - Delivering Sustainable Development
PPS23 - Planning & Pollution Control
CS28 - Local Transport Consideration
CS32 - Designing out Crime
CS33 - Community Benefits/Planning Obligation
CS34 - Planning Application Consideration
CS20 - Resource Use
CS21 - Flood Risk
CS22 - Pollution
CS03 - Historic Environment
CS05 - Development of Existing Sites
CS01 - Sustainable Linked Communities
CS02 - Design
CS04 - Future Employment Provision
PPS5 - Planning for the Historic Environment