HOE
NEIGHBOURHOOD
FORUM

FINAL DRAFT

MARCH 2021

Former Plymouth Registry Office
Feasibility Study

lhc design

FORM
DESIGN GROUP ARCHITECTS

lhc design

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Our work offers intelligent design solutions coupled with commercial viability.

We employ specialists across a range of related disciplines which means we can offer our services separately, or in combination, with staff collaborating in multi-disciplinary teams and working from the widest strategic vision through to the smallest architectural or planting detail.

NOTE

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- *Imaginative and technically proficient solutions.*
- *Realise outcomes that are sensitive to place and cultural identity.*
- *Deliver rational and sustainable results.*

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01. Introduction & Background

1.1 Introduction & Background
Introduction

The purpose of this report is to provide guidance that can achieve a realistic and acceptable redevelopment of the redundant Plymouth Register Office within the Hoe Conservation Area. It addresses community concern that, given the prominence and value of the location and proximity to the Hoe Park, commercial pressures and Council planning policy could lead to inappropriate over development. This would inevitably raise the issue of affordability and reduce the ambition to attract a younger demographic into the area to the strengthen community cohesion and pride of place. The consultant team has evaluated the physical and environmental constraints of the site and set out a robust argument for a sensitive approach that can help meet these aspirations. It describes the criteria by which any proposal that comes forward can be assessed and outlines a framework for a mix of affordable homes and key design measures to meet the fundamental challenges for sustainable city living and people's wellbeing in a changing climate. It also provides a response to an initial planning consultation.

1.2 Introduction & Background
Summary

1.2.1 Client: The Hoe Neighbourhood Forum

The Forum has been established to bring local residents, community organisations and businesses together. It provides a mechanism for engagement and discussion about the issues that affect living in an extremely valuable waterfront district. It is undertaking a Neighbourhood Plan that will help guide the evolution of the place as envisaged by those who live within it.

1.2.2 Consultant Team

A consultant team, with the requisite disciplines, has been assembled to assess the principal constraints and understanding of the base line information that will guide the redevelopment proposals. It includes initial assessments of the arboriculture, biodiversity, infrastructure, drainage, topography, architectural and urban design characteristics. Individual advice notes that have contributed to the study are appended and summarised in this report.

LHC Design
Architectural, urban design and landscape services in collaboration with Form Design Group.

Form Design Group
Architectural, urban design and landscape services in collaboration with LHC Design.

AWP
Highways, drainage and utilities due diligence.

Aspect Tree Consultancy
Arboricultural services including tree survey and tree constraints plan.

Western Ecology
Preliminary Ecological Appraisal

A.D Horner
Topographical survey

Gates Consultants
Cost Consultancy

This study contributes to the community aspiration to care for the territory within the Hoe Neighbourhood Area. It confirms that a mix of residential and congregational space can be accommodated on the redundant Register Office site. It examines the constraints and opportunities and incorporates the findings from specialist investigations, as well as suggesting how the redevelopment might be integrated into the physical characteristics of the surrounding environment. It demonstrates design principles and a rationale for progressing a project that is acceptable to the community and sympathetically enhances the Hoe Conservation Area.

The work has been undertaken through a series of workshops with Hoe Neighbourhood Forum members and their advisors Locality, planning officers, and the consultant team. In progressing a scheme, the conclusion sets out the issues that will have to be resolved with Plymouth City Council. Primarily this entails determining which planning policies prevail within the Supplemental Planning Document that will apply in evolving Policy 27 of the Joint Local Plan. The objective is to achieve a scheme that is of lower density and reduced on-site car parking. There will also have to be a mitigation strategy for the removal of the existing trees and their replacement. This brings into question a wider issue of the adjacent section of Armada Way and how this might evolve to improve the setting as a threshold to the Hoe Park.

1.3 Introduction & Background
The Initial Brief & Scope of Study

The Hoe Neighbourhood Area was adopted by Plymouth City Council in July 2017. Within it there is a network of local businesses, residents, and third sector organisations that have come together to care for, protect and enhance their historic waterfront environment. It has led to the establishment of a Neighbourhood Forum and is in the process of developing a Neighbourhood Plan to shape the future of the area. Locality, a national community support organisation, has provided specialist advice in developing this plan under the Localism Act 2011 and successfully attracted grant funding for the Forum to create the tools to shape the future of the area and realise its shared objectives. A Neighbourhood Plan is currently being prepared.

This study investigates how the redundant Register Office site, a key location within the plan area, might respond to the aspirations of the local residents. As part of the consultation process for the Plymouth and South West Devon Joint Local Plan (JLP) a submission was made which commented on the Council's proposed planning statement for the site. This described a high-density mixed-use hotel and residential development as a prelude to the site being marketed and was subsequently adopted as Policy 27 within the JLP. The community has explored the impact of the mix and scale of development outlined in this policy and concluded it is likely to encourage a development that would be detrimental the character of the area and lead to an inappropriate intervention into the Hoe Conservation Area.

The scope of this study accords with Stage 1 of the RIBA Plan of Work 2020. It is informed by previous capacity studies for the Register Office site, undertaken by the Forum, and is designed to clarify feasible alternative uses that would be acceptable to residents, comprising residential and communal accommodation.

It is important to understand that this study does not propose a final design solution but assesses layout options and a preferred way forward. It is intended to highlight the principal opportunities and constraints as a means to defining a strategic brief for any developer that can be embedded in the policies of the emerging Hoe Neighbourhood Plan. Dialogue with the Council has been initiated to examine a mix for affordable housing and local facilities that can incorporate the outcomes of the Hoe Design Guide and Housing Needs Assessment commissioned in support of the Neighbourhood Plan. The study will identify how the Forum members would wish to act collaboratively to evolve specific planning policy through informed discussion with the Council, in line with the National Planning Policy Framework 2019.

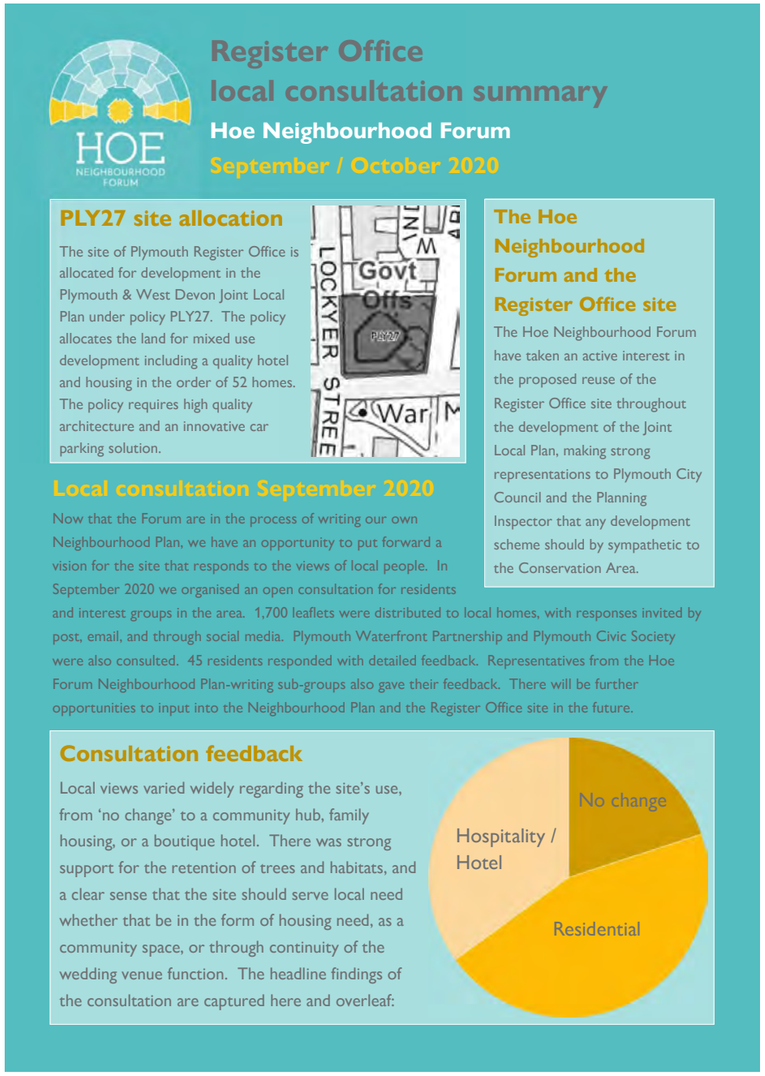
The study will also collate base line survey information commissioned from other consultants to appraise site conditions including site topography, utilities and drainage, arboriculture, existing ecology and biodiversity, and suggest how Council planning policy might evolve to meet local need in line with Government housing policies.

In advance of the adoption of the Neighbourhood Plan, the community wishes to work in partnership with Plymouth City Council, to develop a shared vision for Hoe area including how this key site might be delivered. Residents are clearly concerned about the prospect of over-development now that the Registry Office building has been declared surplus to requirements. The ambition is to find a solution that is sympathetic to the Conservation Area and resist the inevitable commercial pressures resulting in an (inappropriate) unwelcome solution.

1.4 Introduction & Background
Community Consultation

Continuous engagement and community feedback in developing the Neighbourhood Plan has been reflected in the Hoe Design Guide (September 2018) and a Housing Needs Assessment (October 2020), both commissioned by the Forum and produced by AECOM. Reference has also been made to the Council's Hoe Conservation Area Appraisal and Management Plan (April 2009)

These documents will form constituent elements of the emerging Neighbourhood Plan. In parallel a consultation document has been circulated which has sought specific views of the community for this site and desirable uses. The feedback has given clear direction to this brief and formed the basis of the proposals appraised in this document. This ambition is for a deliverable solution that has social value, can make a positive contribution to the historic environment, and of sufficient quality to withstand commercial pressures for incongruous development.



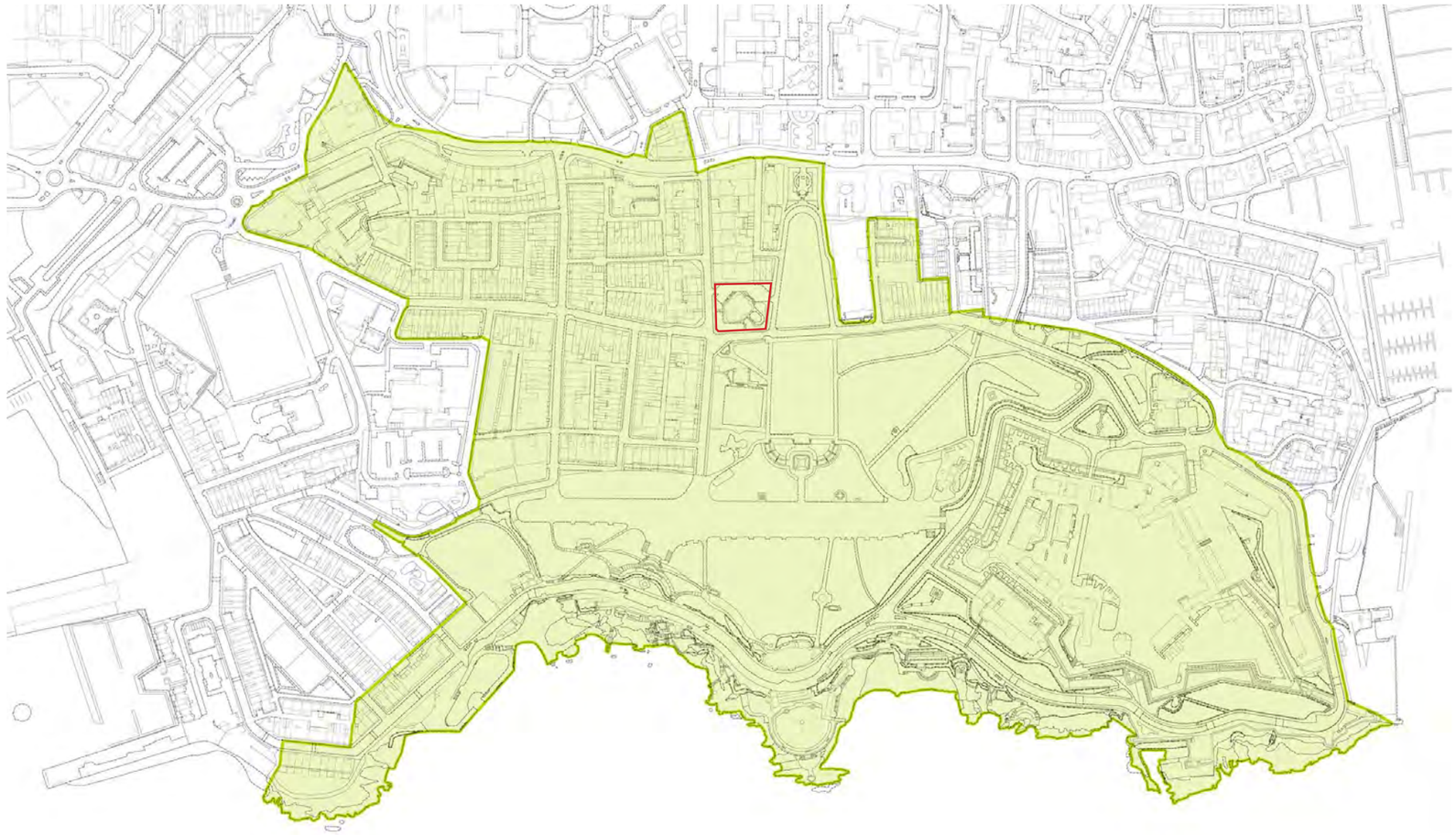


02. Planning

2.1 Planning
Planning & Policy Context

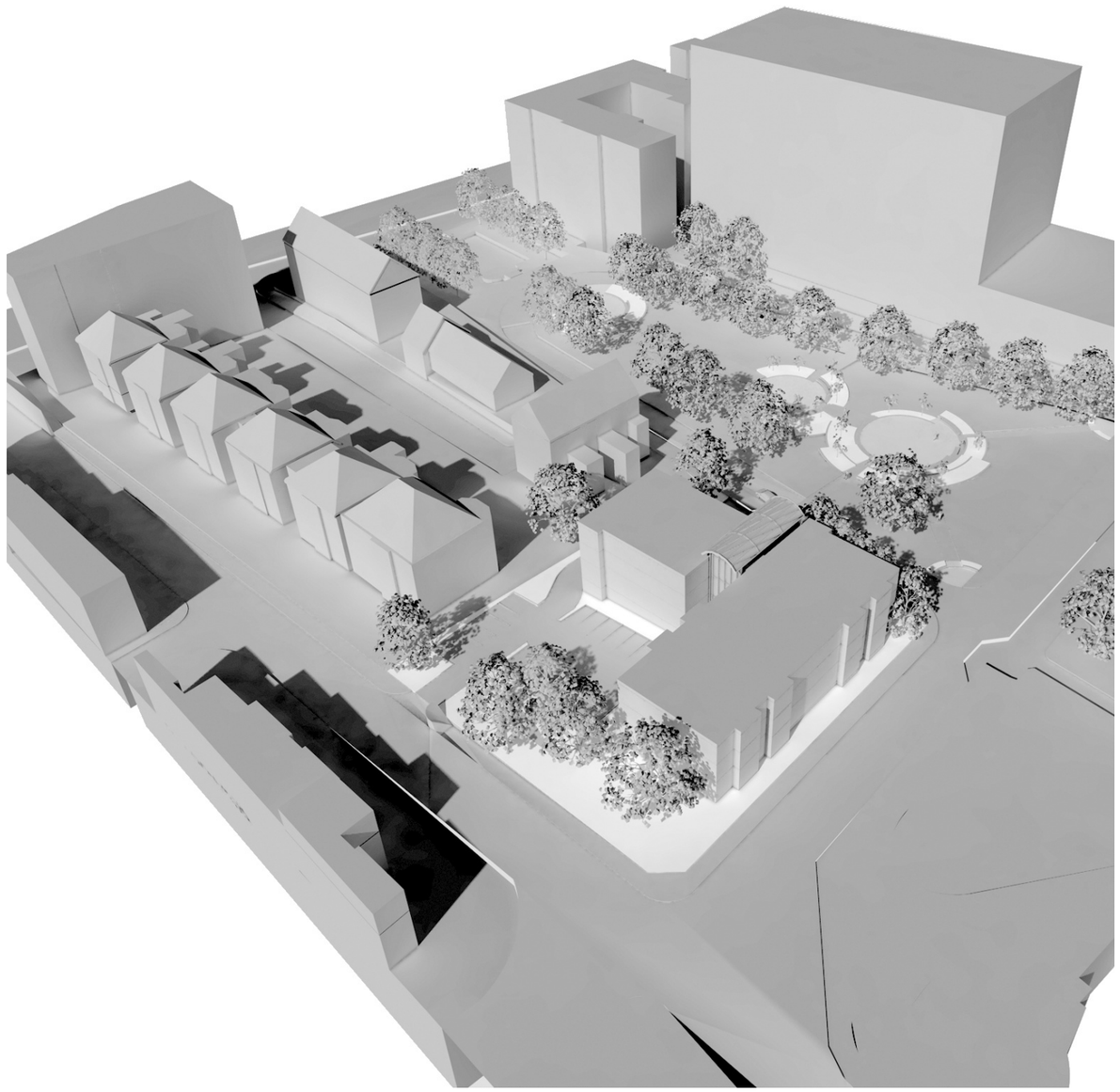
The Hoe Neighbourhood Forum was formed in 2017 to give residents, businesses and community groups a say on local planning matters within the designated area. The Forum is preparing a Neighbourhood Plan to set out a shared vision for the future and help to shape development and growth in the locality. The plan is being written by the community through a process of ongoing stakeholder consultation and policy refinement, and covers new development and housing, heritage, culture, tourism, transport, sense of community, green & blue spaces, and the local economy. A final draft will be complete in May 2021, with a wide public and stakeholder consultation processes following in the summer. Subject to consultation feedback, it is anticipated that the draft plan will be submitted for formal examination in the autumn and will be presented for approval by local referendum in May 2022.

Plymouth City Council resolved to close the Register Office in Lockyer Street by December 2020 and move the function to Derriford Business Park. As part of that initiative, a site planning statement was released in February 2019 that envisaged how the redevelopment of this prime site would be acceptable in planning terms and test market interest. It suggested a variety of uses in a built form, ranging from four storeys along the Lockyer Street frontage rising to eleven storeys at the junction of Armada Way and Citadel Road. This was distilled into a mix suggested of fifty-two residential units together with a hotel. The massing visualised in the statement raised objections from the community. A Forum working group interrogated the impact of the statement to demonstrate that the density proposed was likely to be undeliverable if the Council's car parking policy of one space for each residence was to be observed. These capacity studies provided a considered response to the invitation for community comment on the proposed policy during the JLP consultation process.



Hoe Neighbourhood Forum Boundary — Site Boundary





Above:
Illustrations of previous FDG capacity work

2.2 Planning
JLP Policy 27

The Development should provide for the following:

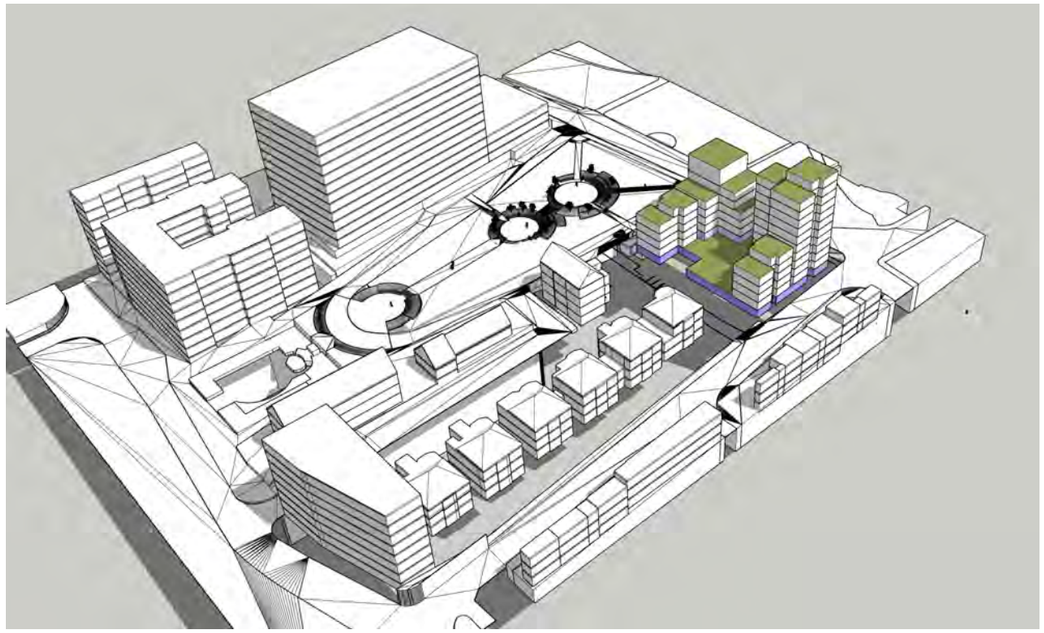
- *High quality architecture that maximises the sites development potential whilst responding positively to the Hoe Conservation Area's historic character and the role as a strategic gateway to Armada Way. The design should be informed by a detailed character assessment to be undertaken for the proposal.*
- *Active ground floor frontages to be encouraged to enliven all public streets and spaces – Armada Way and Citadel Road in particular.*
- *Improved east/west access along the northern boundary of the site, linking Armada Way to Lockyer Street*
- *High Quality public realm including enhancement of Armada Way.*
- *Innovative car parking solutions to reduce visual impact on the public realm.*
- *Relocation of the Register Office function.*

This policy poses a number of challenges that must be addressed if a viable design solution for the site can be created. The notion of providing a strategic "gateway" building, eleven storeys high, as envisaged within the supporting planning statement, may pose a threat to the scale and cohesion of the townscape. Restoration and continuity of the scale and Georgian character of the street scenes might be more sympathetic to the character and consistency of the Conservation Area.

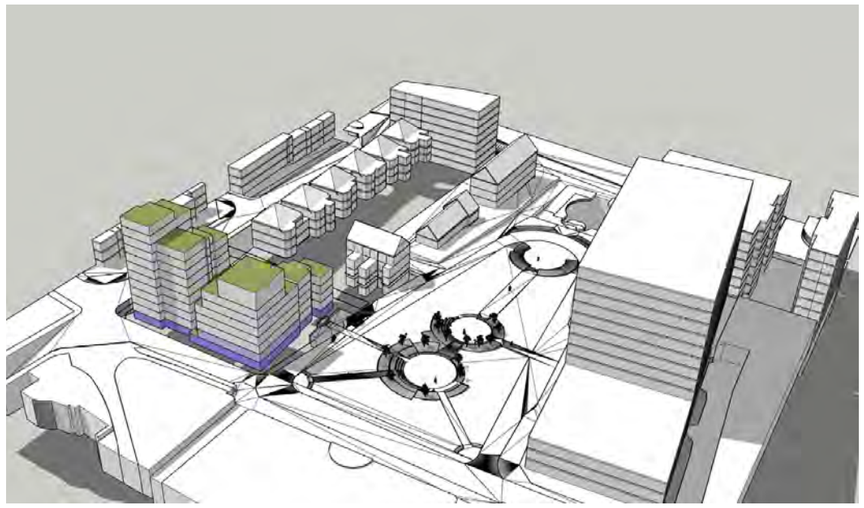
The hierarchy of the street frontages can provide a useful reference to help establish design principles for the site. Reference to historic mapping shows how the street pattern can guide the manner in which elements of the urban block can restore legibility within the Conservation Area. Consideration has been given to priority frontages and has resolved that the primary prospect is the Citadel Road frontage and its visual interface and southerly orientation to the listed Hoe Park should prevail. Secondly the potential to complete the Lockyer Street frontage with its Grade listed villas and thirdly how to address the Armada Way interface, which is more fragmented and overlooks utility grassland, on street parking and vehicular (coach) access to the Crown Plaza hotel. The aim is to reinforce the character and form of the urban block.

Community aspiration is that precedence should be given to develop a plan form that can sensitively intervene into the Conservation Area, provide a legible conclusion to the Hoe residential area, and set up opportunities for a high-quality architectural solution for this key location.

The Plymouth Waterfront Strategic Masterplan (LDA Feb 2017) sights the Register Office as an opportunity site. It highlights the need to provide greater enclosure, the need to relate to existing frontages, and keep the functions within the Hoe district. It encourages active frontages to the primary routes. It identifies the possibility for a landmark housing or hospitality uses that encourages more activity in Hoe Park and Armada Way.



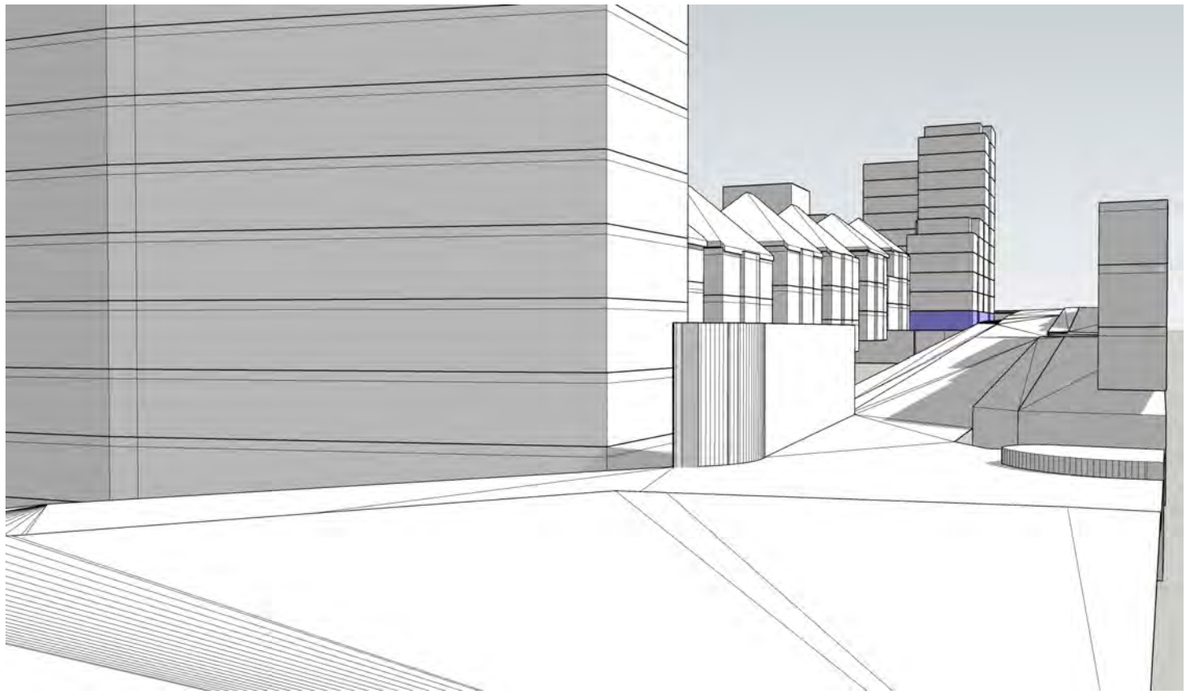
Viewpoint 1



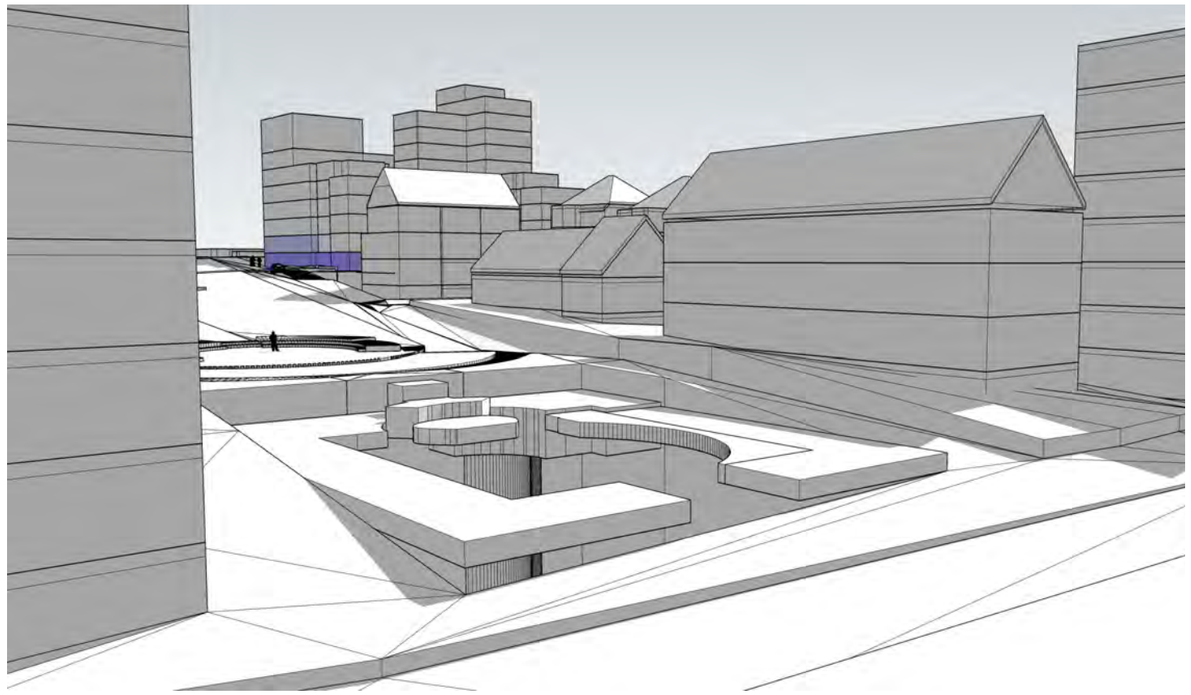
Viewpoint 2



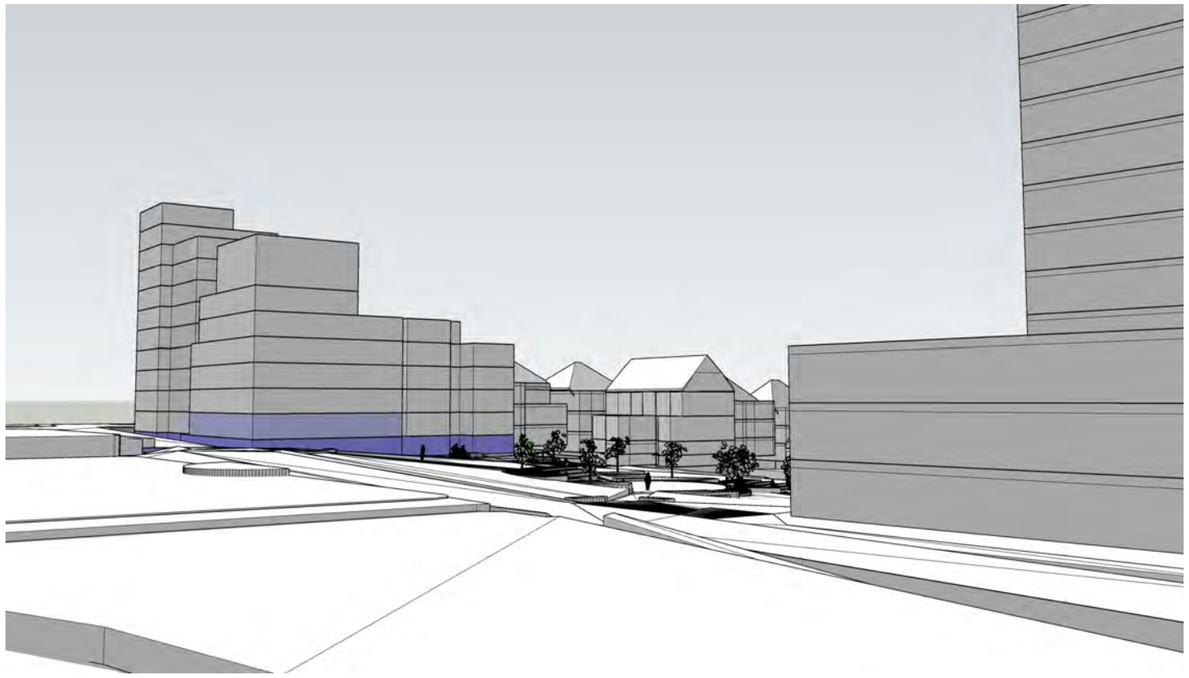
Viewpoint 3



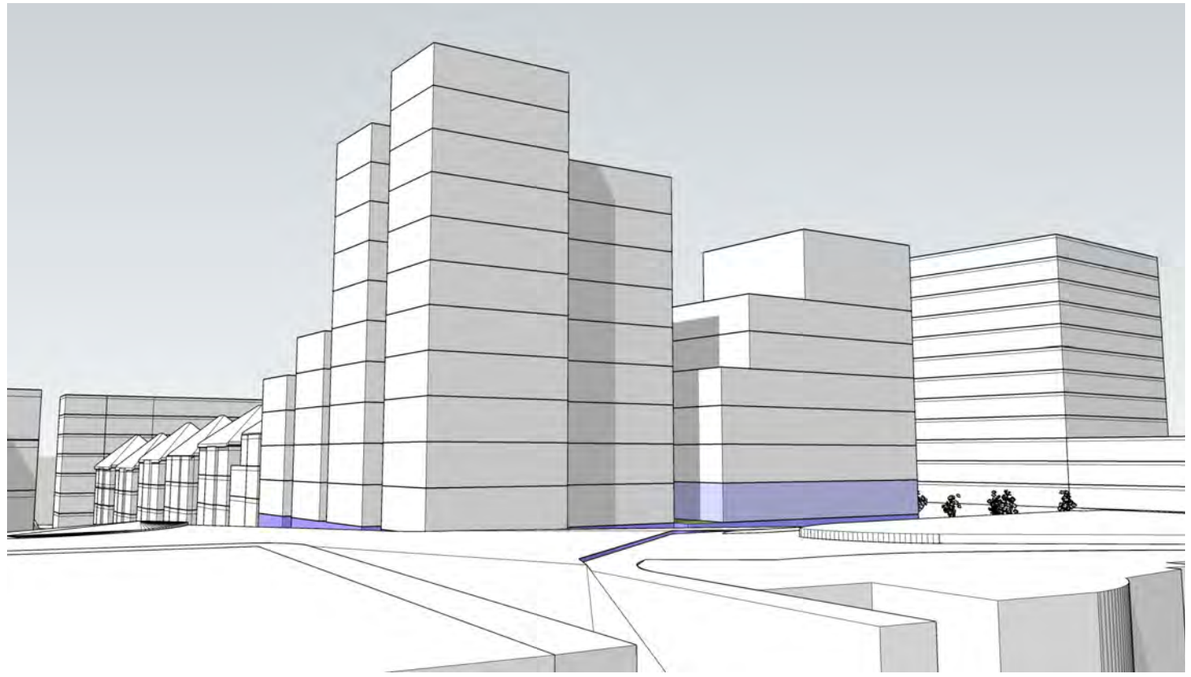
Viewpoint 4



Viewpoint 5



Viewpoint 6



Viewpoint 7

2.3 Planning
Supplementary Planning Document

This extensive document sets out a wide range of design guidance on the implementation policies of the JLP within the Plymouth Plan Area (PPA). It sets out the criteria for Placemaking, Nationally Described Space Standards (NDDS), conservation, amenity and comprehensive design principles. Policy DEV 10 describes the criteria for delivering high quality housing. The Plymouth Housing Development Partnership lists ten registered providers (RP's) to deliver 4550 affordable homes within the Plymouth Policy Area by 2030. This will be a primary source of reference as the scheme progresses towards a planning application.

https://www.plymouth.gov.uk/sites/default/files/JLPSPD2020FINALred.pdf

The space standards for the apartments can be found by following the link below and will be the reference for the proposals tested in this study.

https://www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard

The main policies applicable to progressing a planning application are set out in Housing (DEV 7- DEV13) Place Shaping and Heritage (DEV 20 -21) and the Natural Environment (DEV23 -DEV 28). This study has been guided by DEV 21(6,61- 6.65) which describes the importance ensuring proposals preserve and enhance the Conservation Area and demonstrate compatibility. New buildings are encouraged to represent a contemporary interpretation of the site context and consider basic choices of layout, scale, form and materials.

2.4 Planning
Housing Needs Assessment

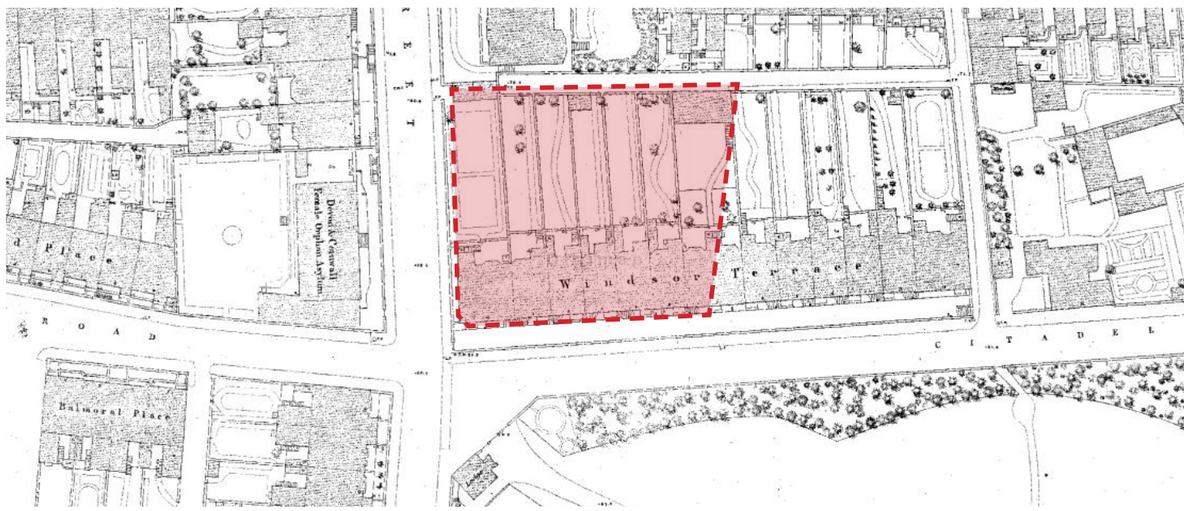
An appraisal of the area wide demographic profile and housing need has been undertaken by AECOM to provide a key piece of evidence for the Neighbourhood Plan. It has demonstrated a need for the elderly accommodation for residents wishing to downsize. It is the Council's view that elderly accommodation was being provided in Millbay, and this would free up larger properties within the area for family accommodation. The reality, however, is that given the Victorian stock, these houses were either in multiple accommodation or being converted to apartments. The Forum's aim is to promote the Register Office site for affordable housing that could attract a younger cohort into the neighbourhood that could actively contribute to the community. With informal advice from housing providers the brief has therefore developed for a mixed-use requirement including 1-3 Bedroom homes together with a flexible congregational space to increase vitality and encourage community activities.

2.5 Planning
Pre-App Consultation

Initial bespoke single piece of pre-planning advice was sought from Plymouth City planners based on a submission that set out a case for a mix of affordable housing and congregational space. It was accepted that this was contrary to JLP Policy 27, so the advice reiterated current policy and related to it. It was accepted that the Forum wished to pursue a mix of affordable homes and flexible congregational space for as yet unspecified uses. It does not include any hotel use. The advice is to robustly demonstrate the evidence for a change of policy and that this would be referred to the Planning Committee and the Secretary of State for the policy to be amended. Advice focussed clearly on the setting within Conservation Area, the existing trees and biodiversity, and encouraged the Forum to enter into a full pre-application process in pursuit of a detailed planning application. The advice note is appended to this report and its implications have been incorporated where appropriate at this stage in testing feasible concepts for the current brief. Previous consultation with senior Council officers had indicated that they would not be supportive of the Neighbourhood Development Order process.

03. Site Appraisal

3.1 Site Appraisal
Neighbourhood Evolution



1850s



1890s



1900s



1910s

Above:
Historic Maps — Site Boundary

3.1 Site Appraisal
Neighbourhood Evolution



1950s



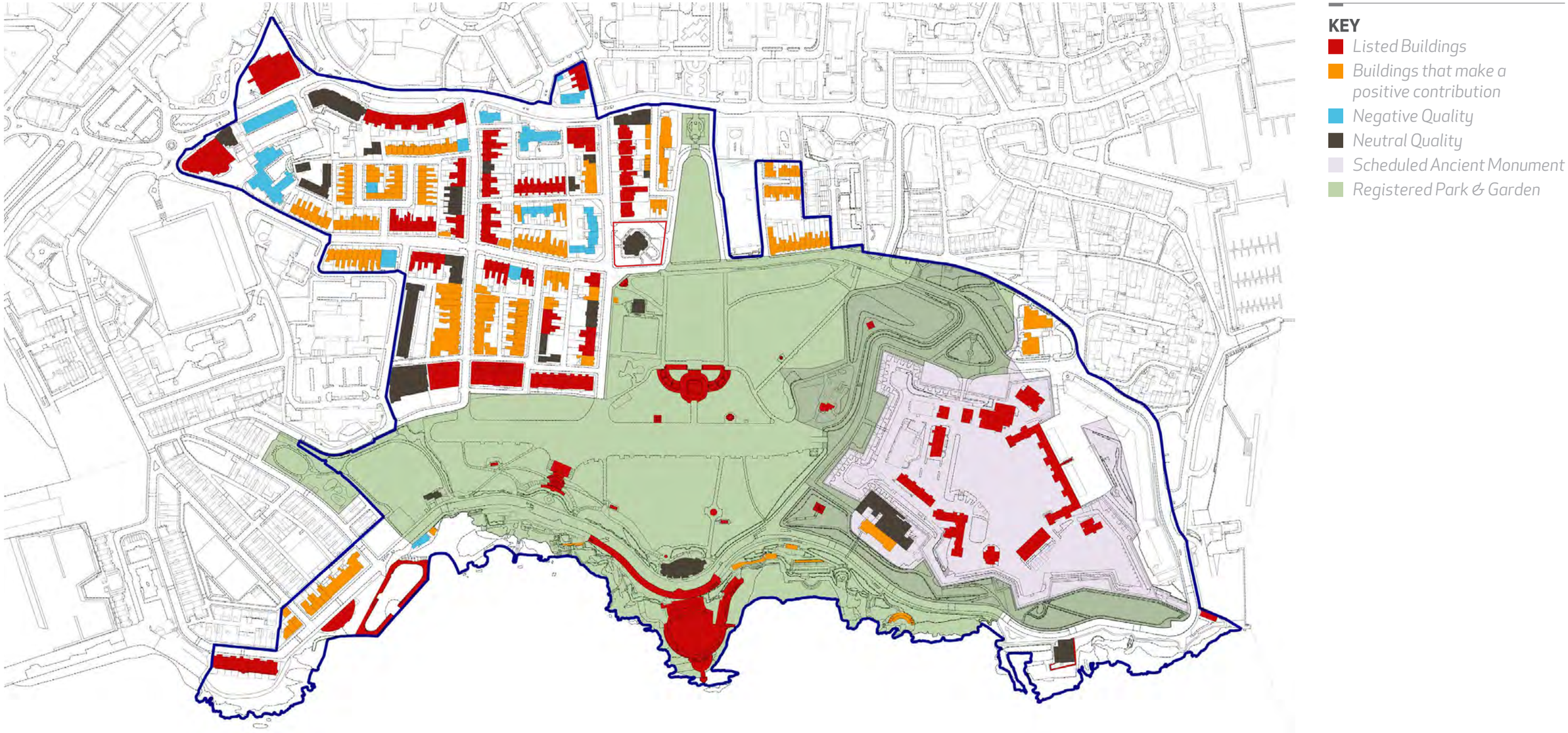
1960s



1970s

Above:
Historic Maps — Site Boundary

3.2 Site Appraisal
Conservation Area & Listed Buildings



Above:
Conservation Area Plan

Site Boundary



View looking north along Armada Way



Villas on Lockyer Street



Lockyer Street west side



War Memorial



Osborne Place



Upper Osborne Place

Above:
Key Site Views

3.3 Site Appraisal
Building Heights



Above:
Building Heights

Site Boundary

KEY

1 Storey *2 Storey* *3 Storey* *4 Storey* *5 Storey* *6 Storey* *6+ Storey*

N

3.4 Site Appraisal
Location Plan



Above:
Location Plan (0.27 Ha)

Site Boundary

N

3.5 Site Appraisal
Site Photographs









A primary conclusion derived from evaluating the physical and planning policy context, is that any redevelopment of this site should positively enhance the heritage assets of the Conservation Area as a first priority. The approach should seek to logically repair the street pattern, or elements of it as far as possible, healing the Hoe Residential Area identified in the mapping and previous studies. It can rediscover and reinvent the street enclosure that has been supplanted by the Register Office building. The issues that any modern redevelopment must address includes the maturity of the neighbourhood, tree cover and mitigation costs, topography, vehicular access and car parking, utilities and archaeology. Individual specialist surveys that have guided the understanding of the key issues are included in the appendices of this report.

Above:
Site Photos

3.6 Site Appraisal
Neighbourhood Facilities



This study, although focused primarily on the feasibility of redeveloping the Register Office site in isolation, considers the wider influence of the Conservation Area, its heritage assets and the differing character of the frontages that address Lockyer Street, Citadel Road and the Hoe Park (Grade 11) and Armada Way. The manner in which these conflicting demands might be resolved is discussed in more detail within Section 4 of this report.

Previous conservation and characterisation studies have been referenced throughout this work. Understanding the surrounding features, green spaces and orientation will underpin how the site advantages can be maximised. The arboriculture and topographical surveys have been undertaken and a more detailed heritage statement will be required in support of a final proposal. For the purposes of this report, here is sufficient guidance available to resolve the priorities that should be observed in developing a solution.

The topography is a constraint for any new development. The site falls across approximately 4.00 m from the southwest to northeast corner. Along the frontage of Lockyer Street there is a fall of 2.00 m from south to north. The frontage to Citadel Road is virtually level.

Above:
Movement & Access Plan

Site Boundary

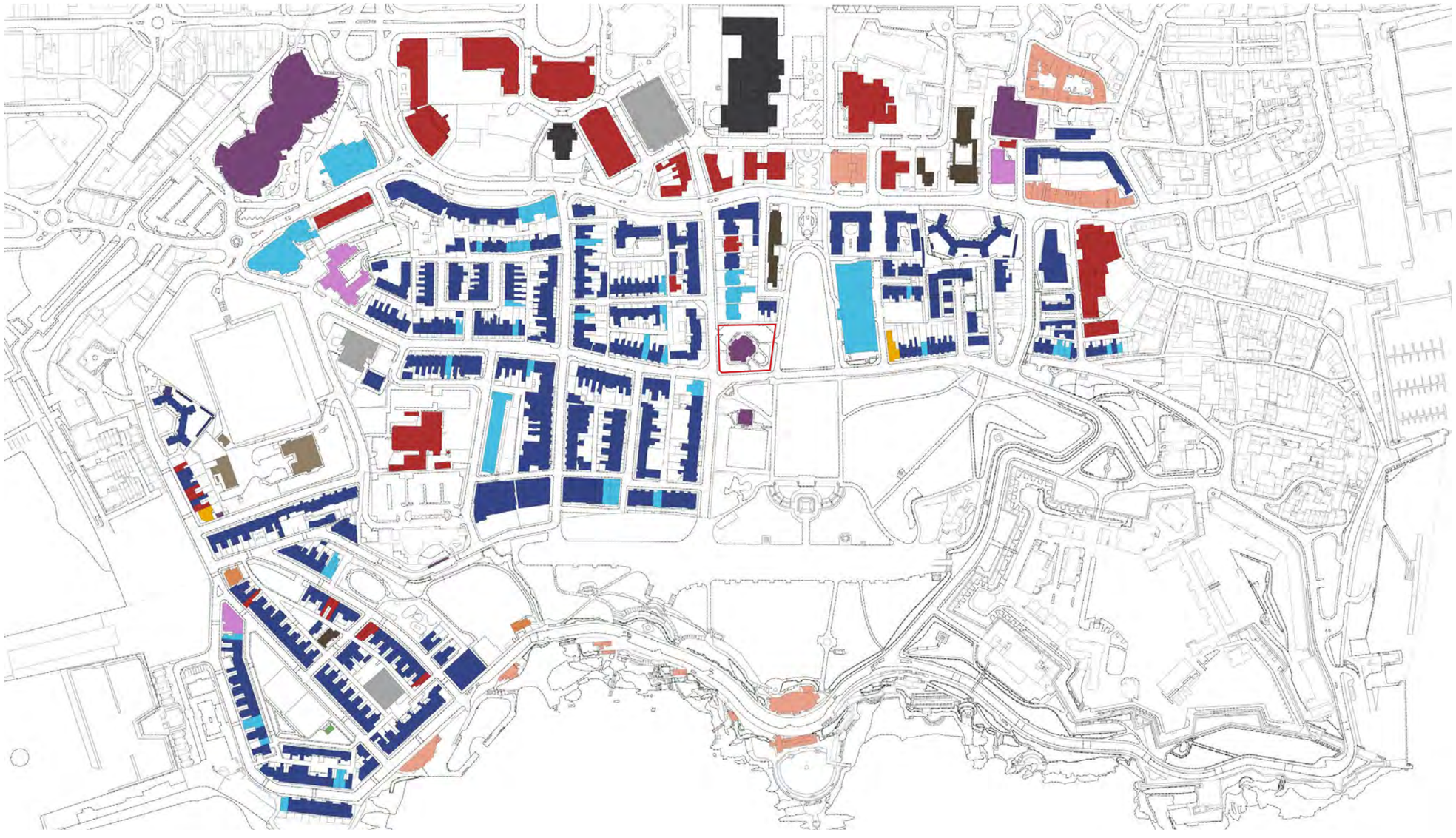
KEY

Primary Pedestrian Route
South West Coast Path
Primary Bus Route
Secondary Pedestrian Route
Bus Stop
Car Park

0m — 200m — 400m
2 minutes

N

3.6 Site Appraisal
Neighbourhood Facilities



KEY
- *Public House*
- *Residential*
- *Office/Commercial Use*
- *Community*
- *Vacant*
- *Cafe/Takeaway/Restaurant*
- *Religious*
- *Hotel*
- *Civic*
- *Car Park*
- *Education*
- *Military*
- *Park Building*

Above:
Local Amenities Plan

Site Boundary

N

3.7 Site Appraisal
Existing Building & Layout/Parking

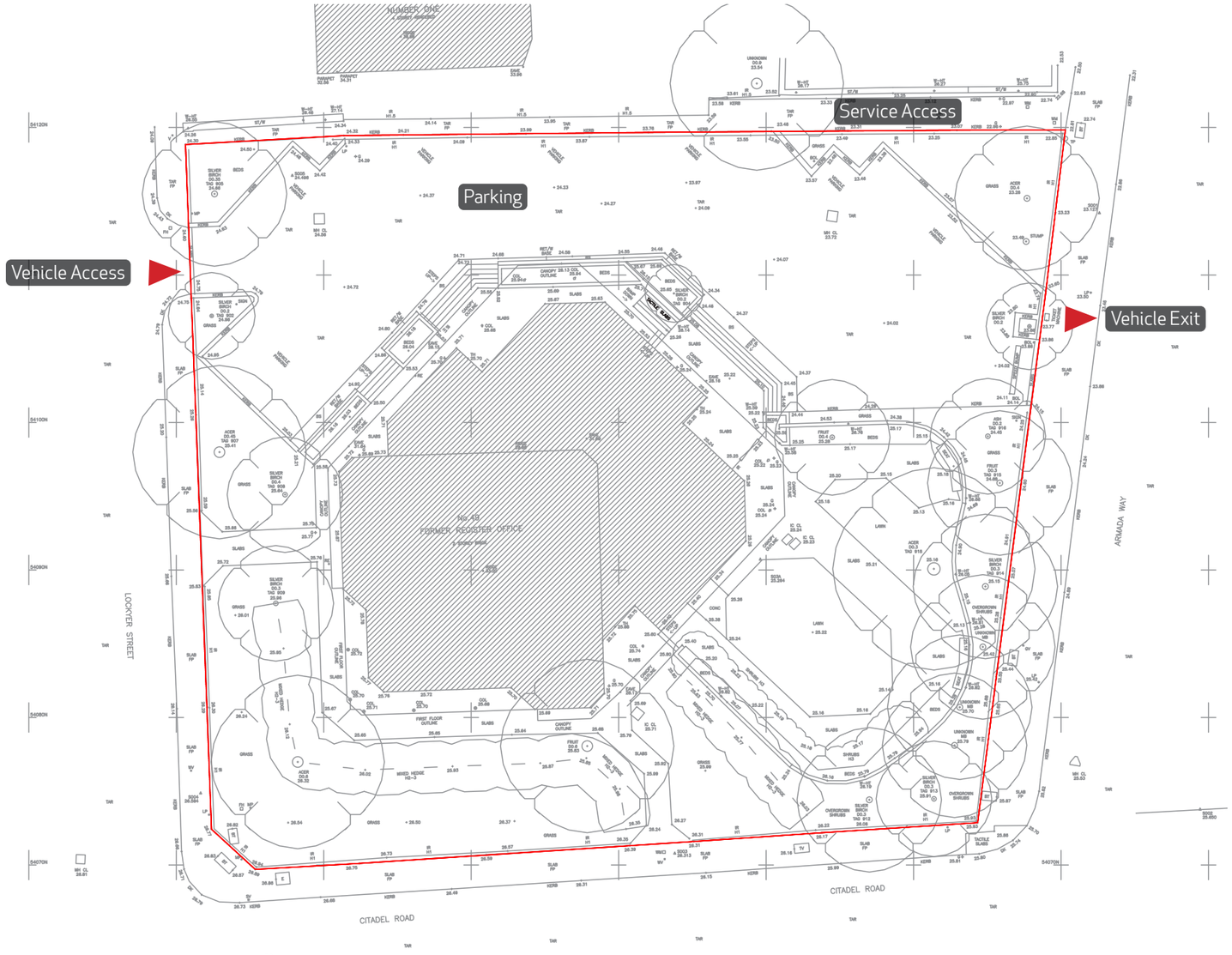
The adjacent four storey Windsor Villas on Lockyer Street rise to 8.00 m to the parapets to the street and 12.00 m to the roof ridge above ground level.

Vehicular access is gained along the northern boundary with car parking for 17 cars including 2 disabled spaces.

The primary interfaces of the site within the Conservation Area, in priority are Citadel Road and southerly aspect to the Hoe Park, Lockyer Street and the relationship to Windsor Villas (westerly aspect) and the utility grassland of Armada Way (easterly aspect).

The Register Office does not legibly relate to the built form of its surroundings and is largely hidden from the street by trees and vegetation. It is an object building that turns its back on its immediate area and does not positively contribute to the main characteristics of the Conservation Area and helps to fragment the urban form and sense of place. There is no continuity in the street scene or relationship with the historic street pattern and urban form.

Currently the tree and shrub cover to the boundaries forms a green enclosure to the site and conceals the existing building. Most of this enclosure contains birch, cotoneaster, maple and a mature Norway Maple on the western boundary which is the only Grade A tree on the site. The remainder has been assessed by the arboriculture survey as being of moderate quality. The Council planning statement indicates the removal of all the tree cover, which is slightly incongruous within the urban landscape, in favour of reintroducing a built enclosure. The existing trees will pose a major planning policy constraint and their removal will necessitate a mitigation strategy and proposals for replacement planting where appropriate.



Above:
Site Layout Plan

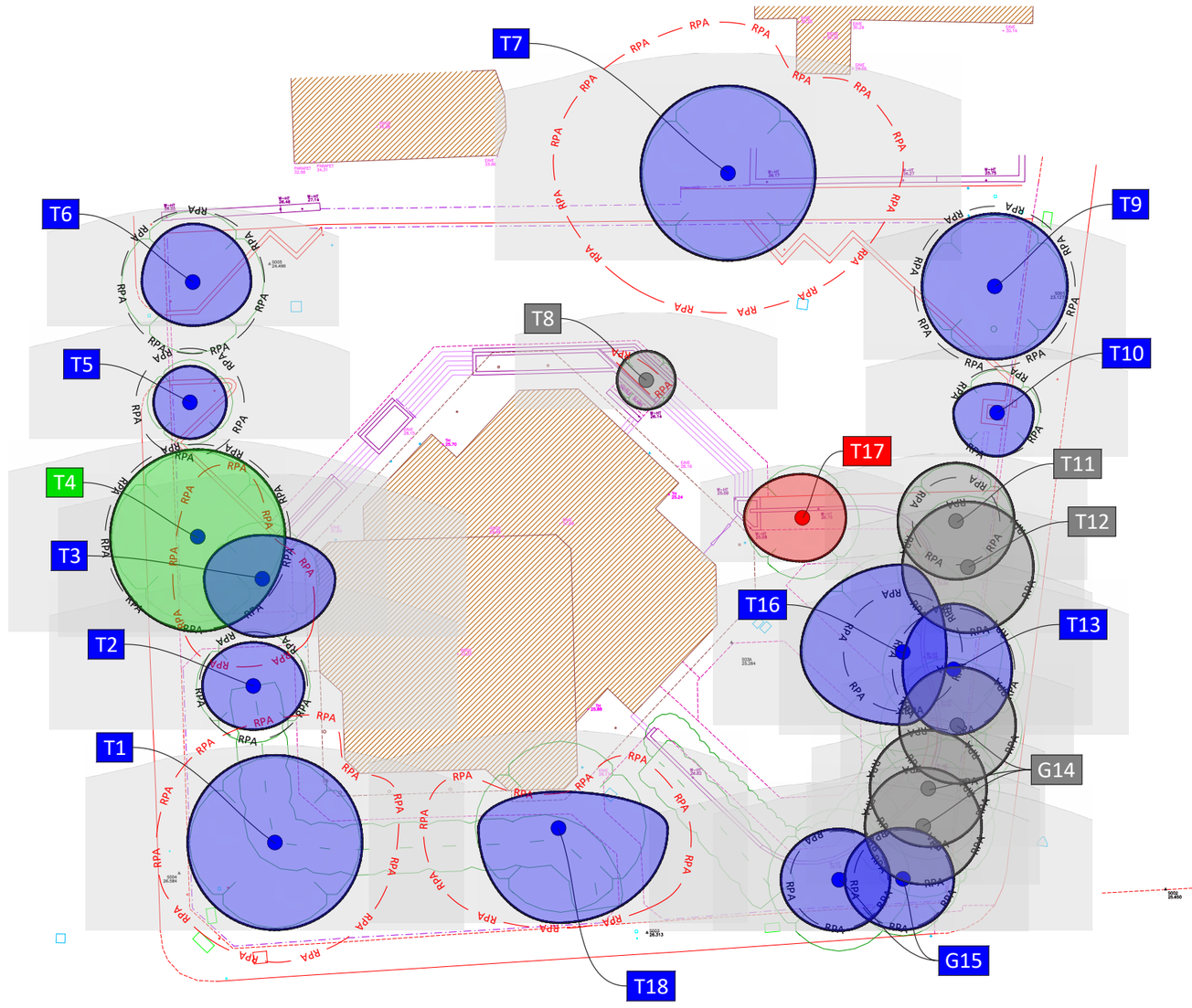
Site Boundary

N

3.8 Site Appraisal
Aspect Tree Plan

The location of the site includes a section of Armada Way that lies within the Conservation Area and contains utility grassland and ash trees around the perimeter. These trees have a limited life due to ash dieback. There is an opportunity is to consider succession planting and public realm enhancement in this section to improve the overall setting of the site, amenity and active uses that might be desirable to aid socialisation and improved biodiversity.

A further public realm issue is the pedestrian pathway adjacent to the northern boundary. This is a historic route that connects Lockyer Street to Armada Way. It is not inviting and is utilised for waste collection bins from the neighbouring properties that back onto it.



Above:
Aspect Tree Plan – Full report can be found in Appendices

Site Boundary

N

3.9 Site Appraisal
Phase 1 Habitat Survey

A Phase 1 Biodiversity and Habitat Study has been undertaken by Western Ecology and is appended to this report. No significant issues have been discovered that require habitat or species protection. The existing building has low suitability for bats and a survey will be required to support a planning application at the next stage. The utility grassland is purely for amenity and the exiting trees and shrubs would provide nesting potential for common birds and this should be mitigated in the redevelopment.



Above:
Phase 1 Habitat Survey – Full report can be found in Appendices

Site Boundary

N

3.10 Site Appraisal
Existing Services

AWP findings are set out below. The most critical issue is the car parking ratio and the initiative to provide a community initiative for low or zero parking envisaged in the emerging policies of the Neighbourhood Plan. This is covered further in Section 4.2 of this report.

UTILITIES

We have obtained utility records for the site and we attach a summary doc showing those affected. In summary:

BT Openreach: A connection to the existing building and services in the eastern footpath.

WPD Electric: A connection to the existing building and services on the north boundary and in the footpaths to east and west;

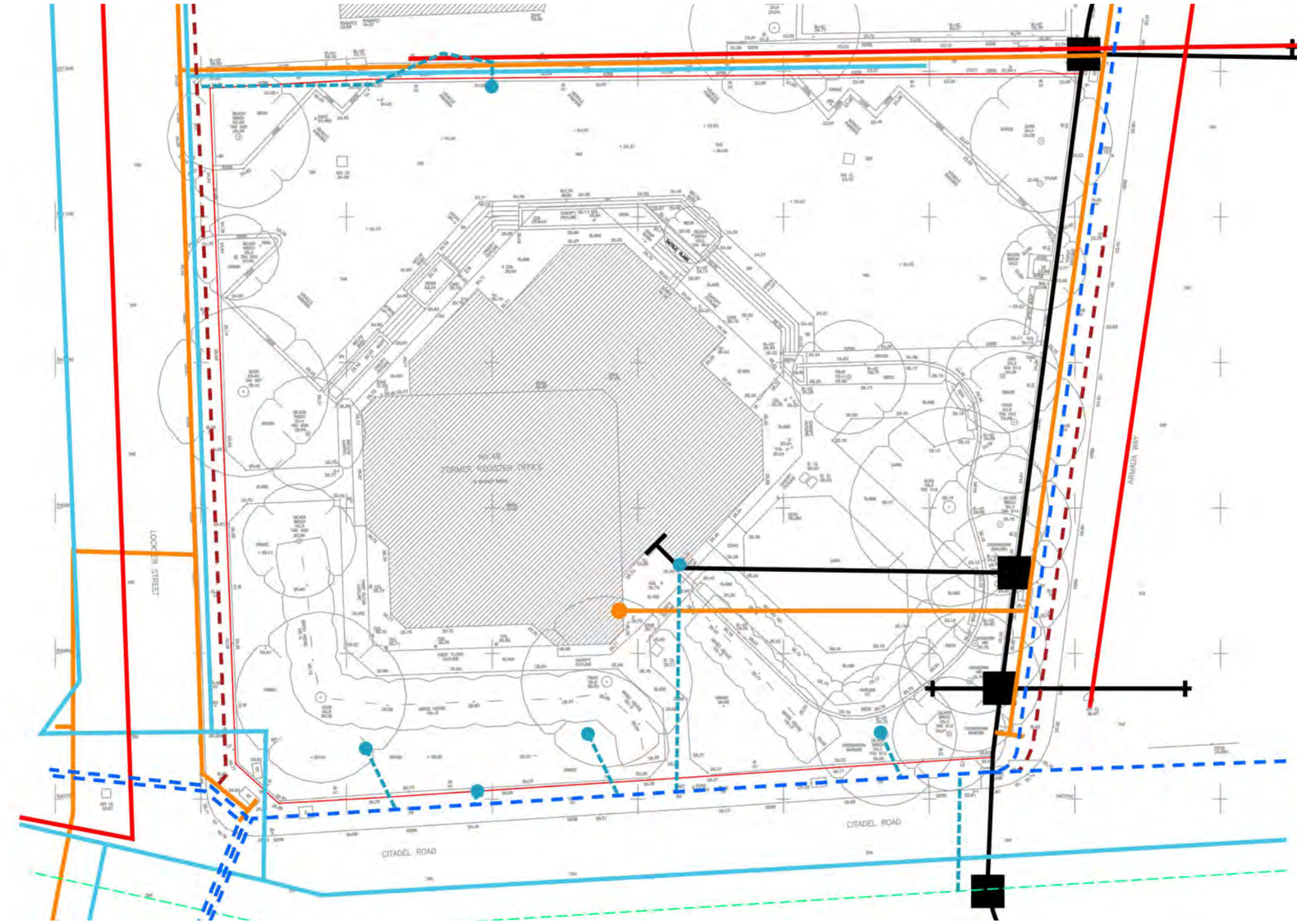
Virgin Media: A connection to the existing building from the western footpath and services in that footpath;

Wales + West Gas: A connection to the existing building and services on the north boundary and in the footpaths to east and west

SWW – Water: Services on the north south and west boundaries – and there must be a site connection.

Given the existing use on the site and the availability of existing services, subject to service provider confirmation, it is expected that all utilities will be available at normal cost and that no major diversions will be required.

When the masterplan is fixed the next steps would be to submit connection enquiries for electricity in particular to confirm the availability of supply and likely costs.



Above:

Existing Services Plan – Full report can be found in Appendices

Site Boundary · High Voltage Power (11KV) · High Voltage Power (33KV) · Low Voltage Power · Power Service Link · Gas Main · Water · Drainage · BT Openreach

N

DRAINAGE

There are foul sewers in Lockyer St and Armada Way. Enquiries are submitted to SWW on the basis of the current proposed masterplan to confirm a suitable point of connection. It is not anticipated that capacity will be a problem.

Once the point of Connection is confirmed and the masterplan fixed the next steps would be to prepare a preliminary drainage layout showing the drainage arrangements on the proposed scheme and how connection is achieved.

Surface Water will need to be attenuated on site prior to discharge to the existing combined sewer or preferably discharged into the ground through soakaways. The Critical Drainage Area declared in Plymouth imposes significant constraints on surface water discharges from new development in the city centre. Calculations of the expected volume to store and likely location of storage and point of discharge will be presented in the Due Diligence report.

The next steps for surface water drainage would be to obtain soakaway testing on the site to confirm the potential for infiltration drainage and then to prepare a Preliminary Drainage Layout based upon the results of soakaway testing and a fixed masterplan.

That would contribute to a Flood Risk Assessment for submission with a planning application.

ACCESS

The proposed means of access shown on the masterplan would be acceptable and would provide a suitable arrangement for services and refuse collection. The proposed Gates may need to be set back from the edge of the footpath to allow adequate space for a refuse vehicle to pull off the carriageway.

Located in the city centre the site is in a highly accessible location as shown on the attached Accessibility Plan.

Parking standards in PSWDJLPSPD can be applied on a case by case basis and include car free development but also have a base requirement of: 1 parking space per bedroom. To accord to policy that would lead to a requirement of 52 spaces against proposals for 16 spaces whilst also acknowledging that the city centre location should encourage low car ownership.

As well as car parking, provision will need to be made for cycle parking in communal facilities for an apartment scheme similar to student accommodation.

Travel planning will also be required and proposals such as a car club would be appropriate in this city centre location.

Next steps would be to undertake pre application discussions with PCC Transport officers to confirm the appropriateness of the proposed parking and access arrangements.

CONCLUSIONS

There are not anticipated to be any show stopping utility or drainage issues that would preclude redevelopment. Provision of surface water drainage is likely to involve above normal cost for attenuation or soakaway drainage.

Parking proposals will require agreement of a low ratio which will need to be confirmed with PCC highways.

04. Proposals

4.1 Proposals
Opportunities & Constraints

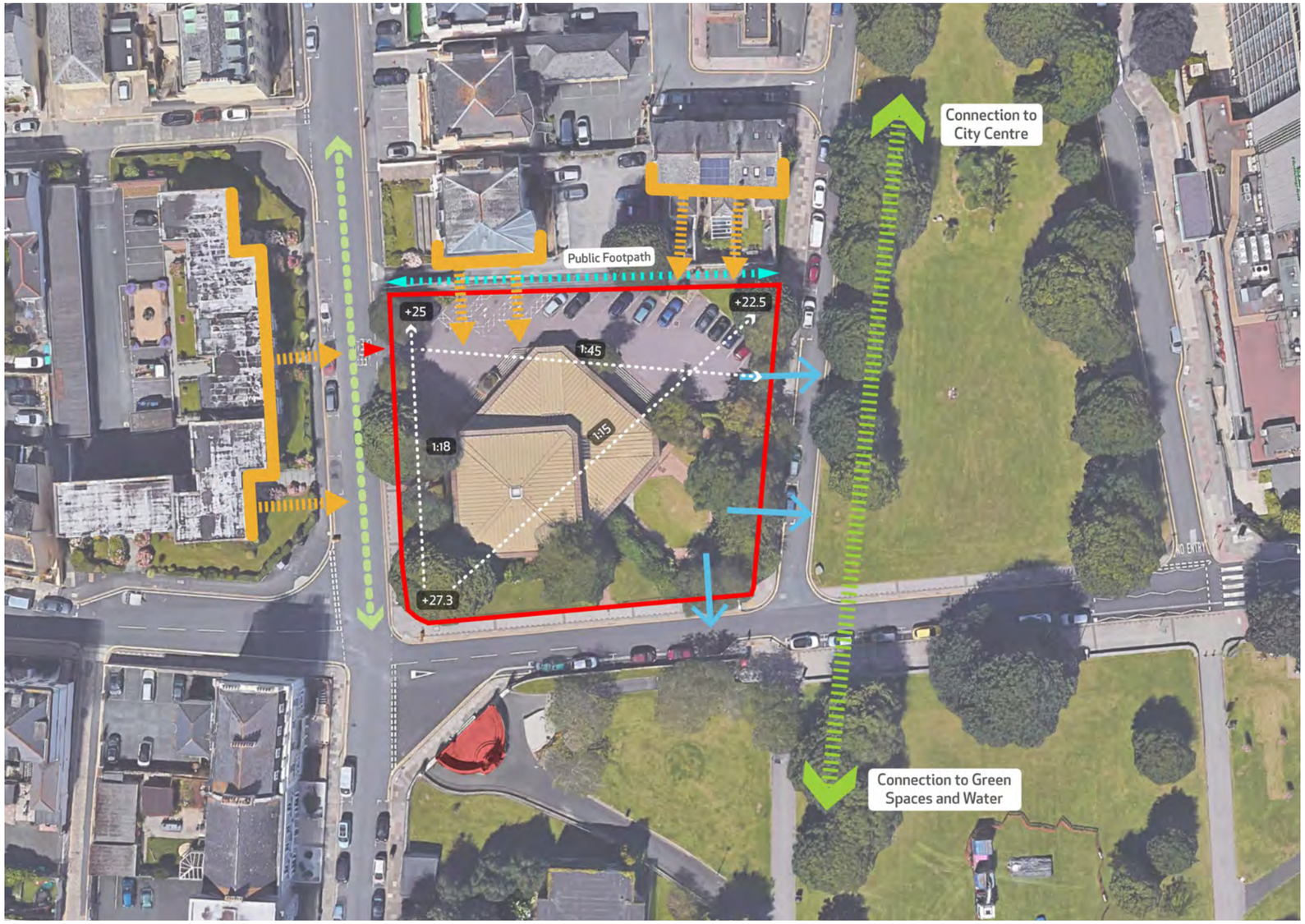
The approach to defining a site layout has been driven by a number of factors. The heritage context and topography are key drivers for judiciously intervening into the Conservation Area. The variety in the townscape of the surrounding streets has influenced the approach and the desire to create a more cohesive townscape to the residential territory on the Hoe by repairing the urban block that contains the site.

The massing and form set out in the planning statement has been appraised in more detail and concluded a rational for an approach that avoids the temptation for placing an object building on the site is a preferable. Reinforcing sense of place within the Conservation Area and embracing some of the key guidance referred to in the Supplementary Planning Document indicates a less dense scheme that completes the enclosure to heal the urban block, respect the scale of the existing street pattern and be more sympathetic to creating a legible place.

This can be readily appreciated from the ground figure plan and highlights the opportunity to provide more continuity to the townscape and enhance the maturity of the place with a contemporary intervention that is informed by the site characteristics and surrounding heritage assets.

A hierarchy is suggested that has the potential to complete the rhythm and scale of Windsor Villas along Lockyer Street and maximise the southerly aspect by the Citadel Road frontage. This provides opportunities for beneficial solar orientation and strengthen a visual connection with the Hoe listed park. This frontage was historically known as Windsor Terrace and historic mapping demonstrates how it was originally configured. In so doing the architecture can relate to the proportions of the street scene and echo the wider characteristics of the Conservation Area responding to building lines and improved enclosure. The guiding principle has been to create opportunity for a polite response to the site that observes the clear recommendations of the Hoe Design Guide prepared in 2018.

The primary vehicular access is positioned to the north of the site of Lockyer Street. There is an exit onto Armada Way. Adjacent to the northern boundary is a public footpath and these routes provide east/west permeability between the two streets. These are essentially a site fixes.



Above:
Constraints Diagram

Site Boundary

KEY

Primary Pedestrian Route
Secondary Pedestrian Route
Public Footpath
+27.3 *Site Gradients*
Open Aspect Views
Privacy/Overlooking
Site Entrance

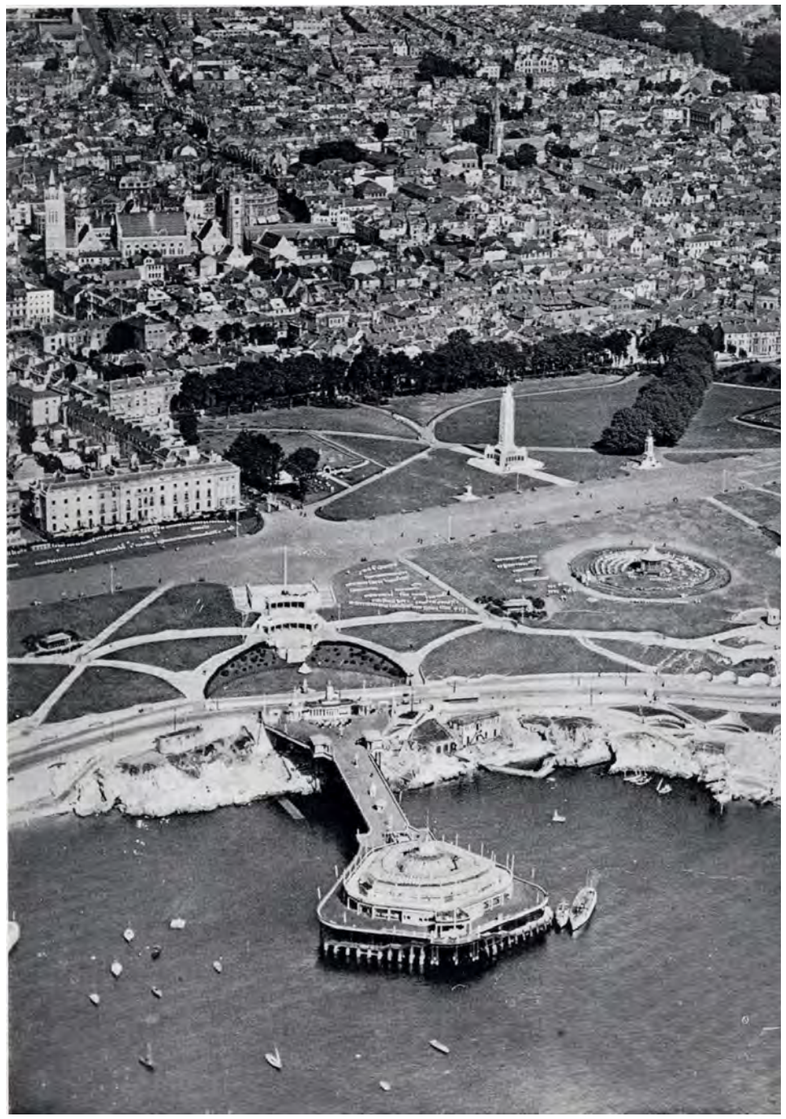
N

A site strategy has been evolved, driven by the criteria identified in the appraisal of the policy and physical context. It establishes the design principles that should be observed for a residentially led mixed use can be configured to sit comfortably within the Conservation Area. They can be summarised as follows:

- *Demonstrates a respect for the key characteristics of the Hoe Conservation Area*
- *Provides enclosure to the boundaries of the site that restores the coherent layout to the urban edge of the Hoe residential area in this location.*
- *Observes a massing and form that provides legibility to the townscape and respects the existing Victorian architecture.*
- *Addresses the hierarchy of demands within the street pattern frontages.*
- *Maximises the connection with the Hoe Park and waterfront.*
- *Uses solar orientation to contribute to energy reduction.*
- *Maintains and enhances the biodiversity of the site.*
- *Maintains and enhances east/west pedestrian links.*

This establishes a basis for framing alternative iterations with flexibility in how accommodation can be provided and contribute to formulating a development brief acceptable to the local community. It assumes, given the City Centre location that car parking is kept to a minimum that is likely to be commercially acceptable to the provider. The community has expressed a desire for a car sharing solution that could be managed by a specialist.

The objective is to craft a contemporary counterpoint to the architectural language of the John Foulston designed Windsor Villas (Grade 11) and restore the urban block and street scene with a potential massing that can sit comfortably within the exiting urban form.



Plymouth Hoe (Historic Plymouth)



View towards Plymouth Hoe – Armada Way in the snow, c1953 (Plymouth Herald)

Above:
Historic Photographs

4.2 Proposals
Development Options

The site strategy has focused on creating a framework from which various options can be evaluated, both in density and mix in a form that accommodates the 4.00-meter drop to the north east across the site. Given the site geometry, the site falls, differing street frontages, and vehicular access, a decision has been taken to divide the buildings into four separate blocks. This allows the 1-bedroom apartments to be arranged in a three-storey building around a stair core without a lift. 2- and 3-bedroom apartments extending to four-storeys are grouped around two circulation cores to help with building economies. Massing studies indicate that up to five – storeys will contribute to a civic scale to Citadel Road and flexibility for the arrangement of ground floor congregational space in close proximity to the Hoe Park once the brief has been established.

PLY 27 and the accompanying planning statement indicates that the tree cover on the site will be lost and a mitigation strategy put in place for replacement. The key drivers for an urban solution accepts that this is inevitable, and any design will have to address this loss of amenity and suggest how this, and any loss of biodiversity might be mitigated. The impact of these constraints should not pose a major constraint to redevelopment and its replacement and enhancement can be considered as part of an internal amenity area and the surrounding green spaces.



Above:
Design Development Sketches

4.2 Proposals
Development Options

A key issue that will have to be challenged is the Council policy of providing one car parking space per residential unit. Given the location of the site at the heart of the City Centre, proximity to public transport, and the aspiration for affordable housing, there is an opportunity for a low or even zero parking solution. No on-street permits will be available although the Theatre Royal multi-storey car park is within walking distance. The study has assumed that given these factors minimal on-site parking would have to be accepted if a conservation led redevelopment is to be pursued. The move to electric vehicles/cycles and the possibility for community car/bicycle sharing hub managed by a specialist operator such as Co-Car where vehicles can be hired by the hour, might contribute to the green travel plan credentials. This is a goal is captured in the embryonic policies of the Hoe Neighbourhood Plan.

The emerging policies of the Neighbourhood Plan describes the move towards more sustainable mobility. Residents have expressed a desire to balance all modes of transport and reduce the impact of the cars within the plan area. The draft policy is set out below:

PT1: Promoting sustainable mobility

New development should be designed to reduce the likelihood of travel by car and support a more sustainable local transport network. It should:

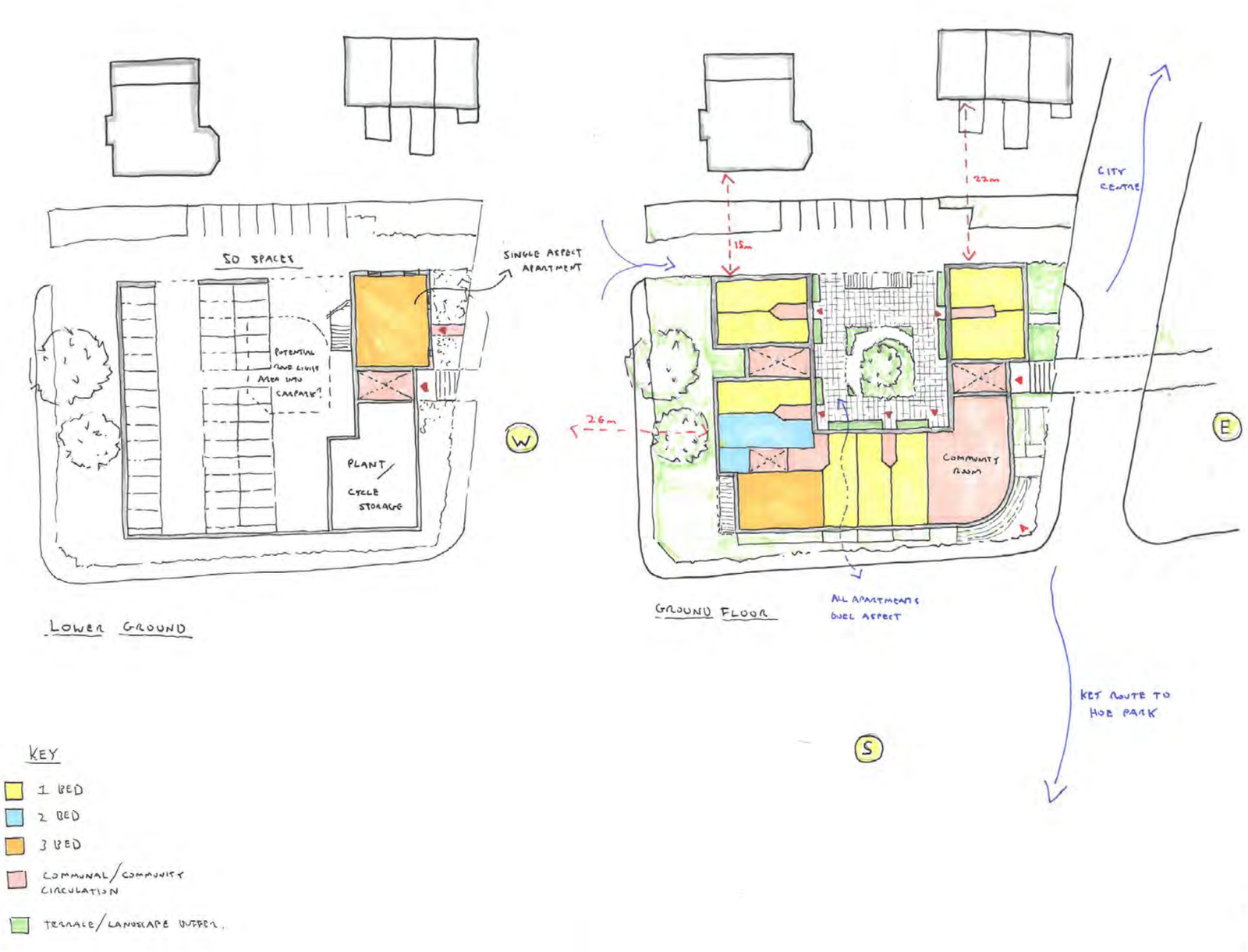
A. *Prioritise walking, cycling, and public transport as the most favoured modes of transport;*

B. *Take all available and reasonable steps to reduce the use of cars, to provide electric vehicle and e-bike charging points, and/or car-share schemes.*

Development which would increase the likelihood of travel by car will not be supported unless it is demonstrated that this can be managed effectively through a green travel plan.

Proposals for the introduction of on-street / curbside public electric vehicle charging points or mobility hubs in suitable locations will be supported, provided that they are sited appropriately and will not impede pedestrian or cyclist safety.

Proposals for new cycle paths that improve cycle connectivity will be supported, provided that they are well-designed and safe.



Above:
Design Development Sketches

4.2 Proposals
Development Options



The conceptual solution has minimised the area for car parking within the site and suggests it should be managed to favour less ambulant residents and provide more secure facilities for cycles/e-bikes and car sharing opportunities either dedicated or for hire. The AWP infrastructure report sets out current Council policy and is appended to this report.

The site capacity has been generated through debate, workshops, and an examination of plan forms and massing studies. It has concluded that a flexible layout can deliver the mix of uses envisaged within the Forum's brief that feasibly responds to the site parameters and its context. It integrates the findings of the site appraisal and consultant reports and demonstrates how conceptual ideas might be progressed for a sympathetic intervention that respects the proportions, rhythm, and scale of the Conservation Area.

A residential mix is proposed, ranging from 1bed/2person apartments to 3 bed/5person apartments, all in accordance with Nationally Described Space Standards (NDDS). The total density of homes that can be provided varies dependant on the scale of the Citadel Road deemed appropriate from an urban design perspective. The base line is minimum of 32 units to a possible maximum of 40 units. The proposals include a two storey volume to be occupied on the ground floor congregational facilities. 20% of the homes would be in compliance with the Building Regulations Part M4(2) standard for accessible homes. The Forum has stated an ambition that all homes should meet this standard.

KEY

3 Storey 1 Bed Flats

2 Storey Commercial / Active Space
2 Storey 3 Bed Flats Over

4 Storey 2 Bed Flats

Schedule

12 No 1 Bed Flats

16 No 2 Bed Flats

04 No 3 Bed Flats

32 TOTAL

16 No Parking Spaces (50%)

Above:
Strategic Sketch Layout/Plan

Site Boundary

N

4.2 Proposals
Development Options

The requirement to provide a multi-functional gathering space with an active frontage to Citadel Road is configured to allow natural cross ventilation essential in the post Covid world. This provides a community hub for residents and the wider public to gather. The brief has yet to be developed but might accommodate a small-scale performance space, gallery, café, meeting and wedding functions. Given the proximity to the Hoe Park, and the high level of footfall to the waterfront, this is considered a highly sustainable venue, and a potential visitor destination. A ground floor space is suggested with sufficient volume to accommodate a variety of uses as the brief and management criteria are evolved.

Pedestrian permeability linking Lockyer Street to Armada Way needs to be enhanced and safe. It might be possible to integrate the existing historic route on the northern boundary in whole, or part, and provide a more generous pathway at the centre of the proposed layout. This should be included and further interrogated for outline proposals in the next steps in consultation with the property owners affected.

A number of layouts have been tested in conjunction with 3D modelling exercises to demonstrate how flexibility can be incorporated into the conceptual designs and provide a basis for further community engagement and consultation with the Council. It is also a means for researching partnering initiatives that can deliver a proposal of architectural merit. By breaking the accommodation into separate buildings, the topography and street scenes can be ordered within a strategic masterplan that can be fine-tuned as the scheme is evolved.

The site has the huge advantage of access to the seafront, Hoe Park, and City Centre public amenity. The ground floor congregational space can also offer site-specific benefits to residents and include a small south facing sheltered plaza. Future opportunities exist to improve the adjacent grassland in Armada Way and the experience for pedestrians moving from the revitalised Civic square to the waterfront. The layout encloses a more private external community space which can be landscaped to address the change in levels and linkages between the streets. Individual amenity can be introduced though balconies or through other means as the part of design development.









Above:
Architectural Precedent Images

Image 4: Montrose Place, Grid Architects

4.3 Proposals
Site Layout Options

The following sketch options explore the potential to develop a pedestrian link though the site linking Lockyer street to Armada Way. They also develop the site plan layout of the individual blocks from that shown on the strategic site layout plan shown on p34. The 3 storey blocks to the north of the site respond to both the need for parking requirements along the northern boundary and appropriate offset distances to the neighbouring properties. The volumes fronting Lockyer street and Citadel Road have been adjusted to reflect the historic street layout and use this as their conceptual starting point for the resultant relationship to the site as a whole and also the street frontage.. By contrast the eastern part of the site addressing Armada Way responds to the present day context of the somewhat broken frontage and staggered nature of this part of Armada Way. The echelon approach to this elevation ensures that the built form to this edge of the site sits comfortably in its surroundings.

KEY

3 Storey 1 Bed Flats

2 storey community/active space
3 storey 3 bed flats over

5 storey 2 bed flats

Schedule

12 no 1 bed flats

20 no 2 bed flats

06 no 3 bed flats

38 TOTAL

16 No Parking Spaces (50%)

Note: *final mix tbc. Total flat numbers in range from 32 min. - 40max.*



Above:
Site Layout Option 1

Site Boundary

By moving the 1 bed block to the west elevation slightly further north a more generous route is made possible from the Lockyer Street entrance. Option 2a explores the opportunity for a strong diagonal link through the site linking to the key pedestrian route of Armada Way. It closes the route directly through the site by moving the built form on the east elevation further south to enable a diagonal transition down through the site and retain ample space for parking and high quality public realm.



KEY

3 Storey 1 Bed Flats

2 storey community/active space
3 storey 3 bed flats over

5 storey 2 bed flats

Schedule

12 no 1 bed flats

20 no 2 bed flats

06 no 3 bed flats

38 TOTAL

16 No Parking Spaces (50%)

Note: *final mix tbc. Total flat numbers in range from 32 min. - 40max.*

Above:
Site Layout Option 2a

Site Boundary

N

4.3 Proposals
Site Layout Options

Option 2b explores a more generous E-W link through the site. Parking layout and central amenity space has been re-designed to suit whilst retaining numbers. What has become clear in doing this exercise is that as the pedestrian link through the site becomes more generous and open the challenge is to retain original parking numbers and a reasonable level of central amenity space. Arguably the core central amenity space has reduced in size as a result as shown in options 2a/2b. The exact balance of priorities in relation to amenity, pedestrian link and parking requirements can be further refined during design development with the ability for individual private amenity space such as balconies to be introduced to offset where relevant.



KEY

3 Storey 1 Bed Flats

2 storey community/active space
3 storey 3 bed flats over

5 storey 2 bed flats

Schedule

12 no 1 bed flats

20 no 2 bed flats

06 no 3 bed flats

38 TOTAL

16 No Parking Spaces (50%)

Note: *final mix tbc. Total flat numbers in range from 32 min. - 40max.*

Above:
Site Layout Option 2b

Site Boundary

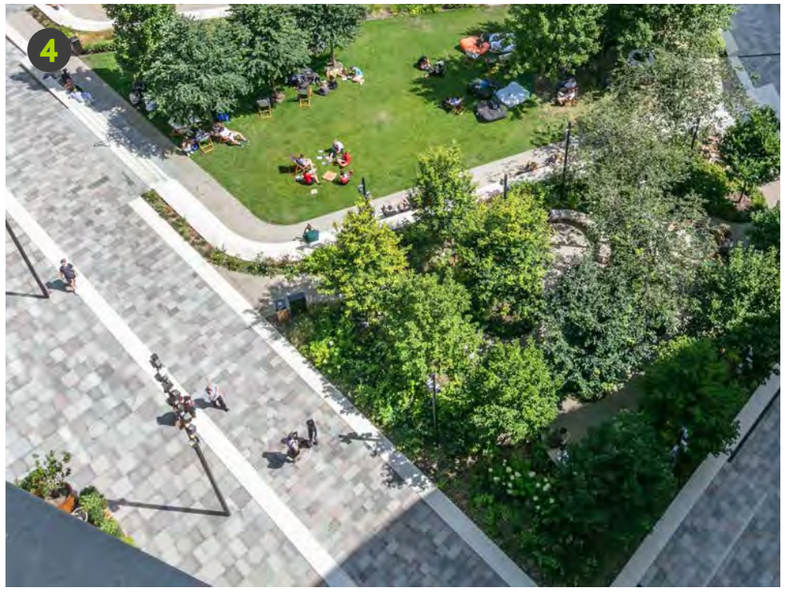
N

4.4 Proposals
Landscape Precedents













Above:
Landscape Precedent Images

Images 1&2: Cargo Plymouth, Ferguson Mann Architects
Images 3-6: Television Centre, Gillespies

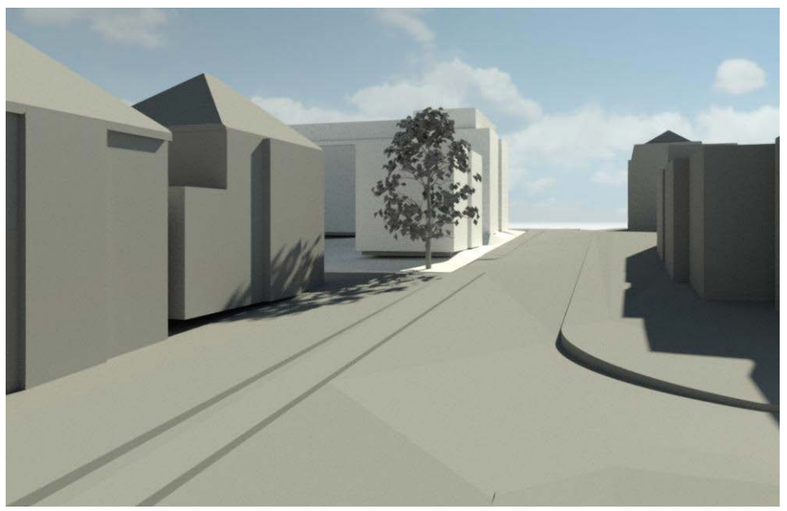
4.5 Proposals
Massing Studies



Viewpoint 1



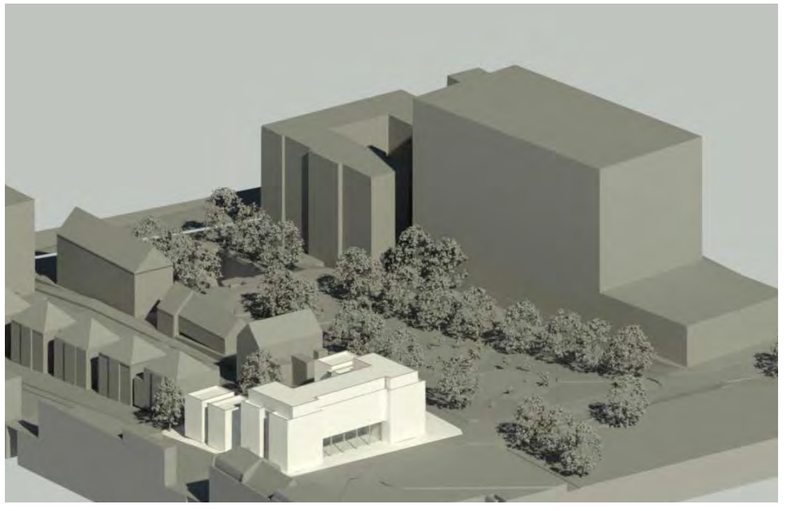
Viewpoint 2



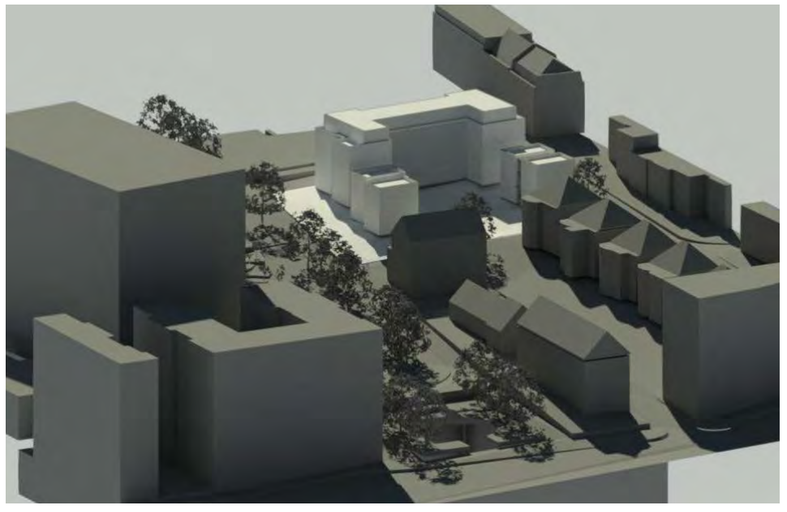
Viewpoint 3



Viewpoint 4



Viewpoint 5



Viewpoint 6

Above:
Key Site Views

4.6 Proposals
Option 2A Illustrative Masterplan



Above:
Preferred Option (Option 2A) Illustrative Masterplan

Site Boundary

N

4.7 Proposals
Artist's Impression

Above:
Artist's Impression of Site

05. Conclusion & Next Steps

5.1 Conclusion & Next Steps

Conclusion

This study recommends the direction the redevelopment of the Register Office should pursue. It provides the evidence for an evolution of JLP Policy PLY 27 that will allow a less dense, more positive contribution to the Hoe Conservation Area. The findings set out the criteria for designing a sympathetic intervention that strengthens the sense of place and urban cohesion. It can deliver a high-quality project that will require a detailed development appraisal to identify the residual land value.

It addresses a key issue for a low car parking ratio that will maximise the site's potential for the mixed-use brief envisaged by the Neighbourhood Forum. It also provides logical arguments to progress discussions with the Local Authority and further resident engagement. It can underpin the strategy for a Neighbourhood Development Order in line with the Forum's Neighbourhood Plan for a pioneering project.

Layout and massing studies have tested and demonstrated that a flexible framework can be created to deliver up to 40 homes, inclusive of one, two, and three bedroomed apartments in a form that realises the local aspiration for the site. It sets out how a congregational space can be incorporated for community and visitor benefit. A building of merit in this location can enrich activity in its surrounding territory. It can influence and initiate how Armada Way might be improved and make a more attractive public space connecting the City Centre to the Hoe. There will be a need to address the loss of trees on the site which could be incorporated into this area. All these issues will require political backing for a genuine grass -route initiative that can benefit the whole of Plymouth's citizenship.

5.2 Conclusion & Next Steps

Next Steps

Careful consideration should be given to the additional areas of work that will be most beneficial to the Forum within the funding currently available. Our experience is that the time required to navigate through the issues is likely to be prolonged. Set out below are the key stages that will assist in moving the project forward. Some can be concurrent and will require significant expenditure in evolving the findings of this report to achieve a planning approval and finalised design.

- *Community Engagement/Consultation*
- *Political Support*
- *Policy Change*
- *Pre- App/Validation/NDO*
- *Design Development/Technical Investigations/surveys*
- *Development Appraisal*
- *Business Case /Viability/Funding*
- *Development Partner/Procurement*
- *Setting/Landscape/Amenity*

Sharing the output of this report with the residents, voluntary groups, and businesses (within the Forum area will be a constituent element in preparing a Statement of Community Engagement required for any future planning application. It is important to explain that feedback from the initial leaflet circulated on the Register Office has been listened to and recognised in the conceptual framework for the proposals and there is still some way to go before a building design can be finalised.

The initial Council support for undertaking this study does not mean that its findings will necessarily be accepted. The Council has stressed that this is a theoretical exercise, and does not commit them to the direction the community wishes to pursue. There may be other development interests that would have to be considered. However, the Government's initiative though the Localism Act encourages a grassroot led approach to planning and this gives the community has a strong voice in promoting a sensitive intervention into the Hoe Conservation Area. This document helps to open that conversation.

An immediate conclusion of this work is that Policy 27 of the JLP should recognise that the density of development it alludes to, is undeliverable and that the environmental and conservation policies within the SPD should take precedence. Advice from the case officer is that a change of policy would be resisted as this proposal is contrary to its specific requirements. A robust proposal for a change of policy would therefore have to be advertised, approved by the Council Planning Committee and referred to the Secretary of State. Urgent consultation with the Council is advised to assess how this significant hurdle might be overcome and how a new approach might be accepted.

If the conclusions of this study are accepted by all stakeholders, then a positive next step is to enter into pre-application planning negotiations with the Local Authority planning officers to work through the work in support of a valid planning submission. The Forum wishes to promote the use of a Neighbourhood Development Order as a mechanism to moving the project in concert with the Hoe Neighbourhood Plan. This can facilitate a close collaborative approach with the Council, housing providers and the Forum to achieve a shared vision for the redevelopment that can potentially unlock funding streams to meet the criteria for low operational energy, low or zero embodied carbon solutions.

To enter into pre-application negotiations the design of the scheme will have to be taken to at least RIBA Stage 2 Concept Design. This will embrace further feedback from stakeholder consultation and could be extended to RIBA Stage 3 if there is a defined programme to delivery. It would include Plan for Use and Sustainability strategies as a minimum and assess the performance risks in meeting the national and local climate challenge targets. Additional work to satisfy validation requirements, as set out in the initial planning advice note (Appendix 6.5), will require an archaeological assessment and development of the initial appraisal work already undertaken. The major issue will car parking provision and impact for sustainable mobility aspirations within the emerging Neighbourhood Plan.

To confidently move towards a robust planning application a development appraisal should be run in parallel to assess build costs, land value and revenues for any affordable housing provider to ensure a viable business case can be made to implement the planning approval. The costs of demolition and ground investigations, given the limestone sub-strata can be included and any additional abnormal casts identified for potential funders.

Selecting a development partner will be essential to help fund and guide the technical aspects of the development and ongoing management regimes, especially if there is a third-party operator for the congregational element of the scheme. The Plymouth Housing Development Partnership can provide a list of potential delivery partners, and the earlier a sympathetic organisation can be identified with access to Homes England funding streams, the more chance there is to realistically move forward.

The setting of this building and its influence particularly on the adjacent area of Armada Way should be included in the discussions with the Council. The Better Places initiative identifies this as a main thoroughfare from the City Centre to the Hoe. It offers the opportunity to improve the amenity and useability of the area for public benefit. It can be a receptacle for mitigation strategies for trees and succession planting that ensures the avenue of ash trees is maintained and reinforced. There is potential to create a hard and soft landscape design that re-imagines it as a suitable threshold to the Hoe and improve pedestrian permeability in all directions.

06. Appendices

6.1 Aspect Tree Consultancy
Arb Statement

Our Ref: 05592 Arb Statement

Form Design Group

11th March 2021

Dear Graham

Re: Tree Removal, Retention and Planting Statement

Site: Register Office, Lockyer Street, Plymouth

Instruction:

To supply recommendations regarding tree removal, retention and planting opportunities for development of the Register Office site. This includes comments based on the quality of the trees as shown in the Aspect Tree Survey and Tree Constraints Plan (11/03/21), local planning policy regarding tree removal and replacement, and planting opportunities on and off site.

Summary:

The trees on the site are mainly birch, Norway maple and cherry. The majority are assessed as being of moderate quality, with one high quality Norway maple. There are several low quality Cotoneaster on the east side, a low quality Norway maple and a cherry, plus a low quality cherry. On balance, the better quality trees are close to the boundary on the west side. The trees on the east side include six that could be removed because of their limited quality, this would leave room for replacement planting.

Offsite trees – Armada Way:

Armada Way public open space to the east contains an avenue of ash trees (image 1). It should be noted that the expectation is that over 90% of ash trees in Devon will be lost to Ash Dieback disease https://www.devon.gov.uk/environment/ash-dieback

These ash trees are not yet showing clear symptoms of imminent death (although assessment is much better during summer months) but it is foreseeable that their removal will be required within the next five years or so. There will then be an opportunity for new planting, of alternative species, on this public open space. It is not however possible to say exactly when this opportunity will arise.

Offsite trees – Citadel Road north of Hoe Bowling Club:

Citadel Road open space immediately north of the Hoe bowling club has several wide spreading cherries present (image 1). There is an opportunity for planting on the grassed area south of these trees.

Offsite trees – Citadel Road east of Hoe Bowling Club:

Citadel Road open space immediately east of the bowling club has oaks present at the northern end, with some ash also present (image 1). Opportunities for planting maybe more limited as this area is used for events.

Our Ref: 05592 Arb Statement

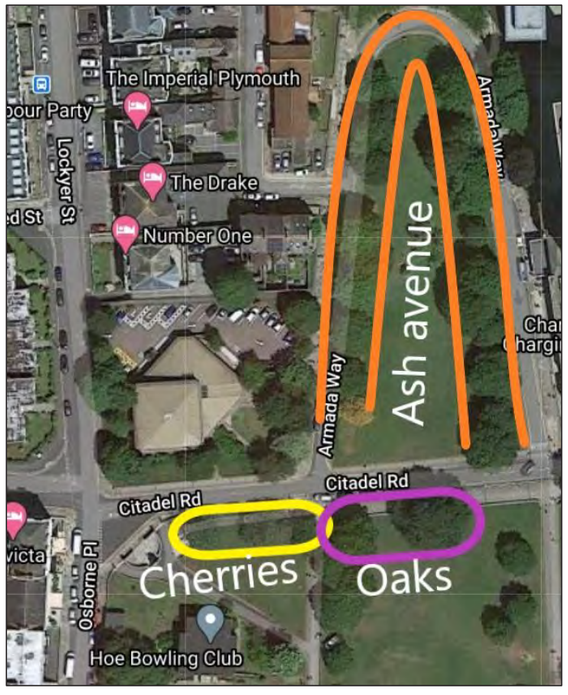


Image 1: *Offsite trees*

Plymouth and South West Devon SPD - Tree Replacement Policy:

The following tree planting requirement policy is included in the SPD.

New planting requirements

7.178 The mitigation hierarchy will be used in relation to tree planting:

- AVOID LOSS – retain suitable(183) existing arboricultural features on-site where ever possible;
- MITIGATE – replace trees lost with on-site planting in accordance with the following table:

- AVOID LOSS – retain suitable[183] existing arboricultural features on-site where ever possible;
- MITIGATE – replace trees lost with on-site planting in accordance with the following table:

Trunk diameter of tree lost to development (cms) (cm measured at 1.5m above ground level	No. of replacement trees
Less than 15	0-1
15 - 19.9	1
20 - 29.9	2
30 - 39.9	3
40 - 49.9	4
50 - 59.9	5
60 - 69.9	6
70 - 79.9	7
80+	8

Table 28 No. of replacement trees needed based on trunk diameter of lost tree

- COMPENSATE– if replacement of all trees lost is not achievable on-site, contributions will be sought through the use of planning obligations; and,
- ENHANCE.

7.188 Obligations in respect of trees will be required where:

- New planting is required off-site to mitigate the impact of a development; or,
- Where A, B or C category trees (see BS:5837 - Trees in relation to Design, Demolition and Construction[185]) are felled as part of a development, where no planting opportunities exist on site, off site planting will be sought to achieve a net gain in canopy cover. However the LPAs' starting point will be to retain trees on-site through design-led retention.

7.191 Contributions to tree planting off-site, to include new street trees where appropriate, will be administered by the LPAs in accordance with local standards.

Given 7.191 it is likely that offsite planting proposals, if agreed, would take the form of a contribution made to the Council in the form of a CIL agreement or similar.

Statutory Protection of Trees

There is currently no Tree Preservation Order covering trees on the site, or the adjacent offsite lime on the north side. The site is in a Conservation Area.

Our Ref: 05592 Arb Statement

Yours sincerely

Richard Fletcher
Senior Arboricultural Consultant – Aspect Tree Consultancy Ltd
FdSc (Arb), MArborA

6.1 Aspect Tree Consultancy
Tree Survey

ASPECT TREE CONSULTANCY

Tree Survey

In accordance with

BS5837:2012 'Trees in relation to design, demolition and construction – Recommendations'

Site Ref:	**Plymouth Register Office**

Instructed by:	**Form Design Group**
Aspect Ref:	**05592**
Survey Date(s):	**03.03.21**
Surveyor(s):	**Richard Fletcher**

Accompanying Plans:	**05592 TCP 11.03.21**

Page 1 of 10

Using the Tree Survey Data

Species

Consideration should be given to whether trees are evergreen or deciduous, density of foliage, and potential nuisance factors such as susceptibility to honey dew drip, branch drop, fruit fall etc.

Canopy Spread

Measured on accessible compass points (estimated where access is restricted) - illustrating approximate current canopy size/shape. Consideration should be given to the existing and future spread of retained trees. Suitable separation between structures and tree canopies should be designed to avoid future nuisance, domination and unreasonable spatial relationships.

Tree Height

Tree heights are shown in the survey data and represented on plan by the shadow arc (existing height = radius of shadow arc).
Future potential height may also be shown - represented by a second arc.

Age Class

Young trees (up to ½ their potential age) generally require enough space to mature if long term retention is planned. Care must be taken with older trees as they are generally more susceptible to damage, and less tolerant of injury/harm through a) root damage; b) compaction of soil; and c) excessive and/or repeated pruning. Adequate space should be allowed for long term physical retention and future maintenance.



6.1 Aspect Tree Consultancy
Tree Survey

Root Protection Area - RPA

Radial **Root Protection Areas** assume a circular area of rooting - calculated in accordance with BS5837:2012.
RPAs represent minimum soil rooting area required to sustain the tree (capped at 707m^2).
RPAs may have been modified to reflect actual site conditions and may not be shown as circular on accompanying plans.
Incursion into the RPA during any part of the investigation, demolition, design & construction phases of the project will require specialist arboricultural input.
Early assessment of impact will facilitate the process and avoid abortive design works.
The RPA is circular by default - any deviation from this must be supported with professional arboricultural assessment.

Shadow Arc

The constraints plan shows the approximate shadow length between 6am to 6pm in 30 minute steps during mid summer using Axciscape Software (a tool used for surveying trees). Using latitude and canopy size, this is a more accurate method for measuring shadow movement than that set out in BS5837 2012.

The shadow arc represents the most significant area affected by obstruction of sunlight. It is not intended to be definitive and requires an amount of interpretation – it is a good starting point to consider shading. Where habitable buildings or useable amenity space are planned within the shadow arc areas it is recommended that further analysis is undertaken using Aspect's tailored software to assess the actual implications.

The shadow arc is not a representation of the absence of skylight/daylight and does not take into account the natural transmissivity of the trees crown – this varies depending on the species etc.

The internal layout, use of buildings and the arrangement and size of windows is also important. Heavy or prolonged shadowing (effects will be exemplified where trees form groups) of main living areas may be inadvisable whilst the shadowing of side elevations and ancillary rooms may be insignificant.



Demolition, Design & Construction Issues

When planning investigations, demolition, design & construction, layouts and configuring buildings it is important to consider the following against potential negative impacts on retained trees: Investigations (archaeological trenches); Construction space required to build the scheme; location of services/utilities; Highway visibility requirements; hard surfacing (a maximum of 20% coverage of previously undisturbed RPA may be acceptable – further specialist advice should be sought); and other infrastructure provisions such as substations, refuse stores, lighting, signage, satellite dishes and CCTV sightlines. Trees can effect and be affected by many aspects of site operations, during the conception and design process the project arboriculturist should be involved in the on-going review of layout, architectural, engineering and landscape drawings.

Proximity of trees to structures[1]: The default position should be that structures are located outside the RPAs of trees to be retained. However, where there is an overriding justification for construction in the RPA, technical solutions might be available that prevent damage to trees. Account should be taken of the proposed orientation and aspect of new buildings, the type of building, its use and location relative to the tree, and the species attributes of the tree. Buildings, footpaths and hard-standing areas should be designed with due consideration to the proximity of retained trees, especially in terms of their foliage, flowering and fruiting habits. Where conflicts might arise, detailed design should address these issues.

Planning Applications

Local Authorities have a **statutory duty** to consider the protection and planting of trees when granting planning permission for proposed development. The potential effect of development on trees, whether statutorily protected (e.g. by TPO/Con Area) or not, is a material consideration that is taken into accountFin dealing with planning applications. Consideration should be given to:

- Legal designations e.g. Tree Preservation Orders / Conservation Areas
- Planning policy – National policy (NPPF) / Regional / Local
- Guidance and best practice: BS8545:2014, **BS5837:2012**, BS4428:1989, NHBC Chapter 4.2, BRE CP75/75, BRE 209.

The level of arboricultural information required for planning may depend on the particular LPA or the type of application being made.

[1] Structure is defined in **BS5837:2012** as any manufactured object e.g. building, carriageway, path, wall, service run, and built or excavated earthwork.

6.1 Aspect Tree Consultancy
Tree Survey

General limitations

Trees are large dynamic organisms whose health and condition can change rapidly, therefore due to the changing nature of trees and other site considerations, this report and any recommendations made relating to tree health/condition are only valid for the 12 month period following the most recent site visit/survey, or sooner following mechanical failure from unseen defects and/or severe weather.

No documented information has been provided regarding any site specific history of ground disturbance, root damage or severance, changes in soil levels, previous utility installations or any changes in site conditions.

Subsidence risk assessment: This report is primarily concerned with the condition of existing trees and the application of current guidance for their retention. Any discussion of soil characteristics is only presented where this may have a direct effect on tree growth. This report does not seek to address the specific area of subsidence risk assessment.

Foundation design: This report does not specifically relate to risks associated with subsidence, heave or other forms of ground disturbance associated with tree root growth or tree removal. The design and construction of foundations should be informed by appropriate soil sampling and laboratory testing in accordance with NHBC[2] Standards.

Installation of utilities & services: Unless otherwise recommended in this report it is assumed that utility installations in close proximity to existing trees will be undertaken in accordance with NJUG[3] guidelines.

Third party liability: The limit of Aspect Tree Consultancy indemnity over any matter arising out of this report extends only to the instructing Client. Aspect Tree Consultancy cannot be held liable for any third party claim that arises following this report. The content and format of this Report are for the exclusive use of the Client. It may not be sold, lent, hired out or divulged to any third party not directly involved in the subject matter without the written permission of Aspect Tree Consultancy Ltd.

Survey method: The baseline survey was of a preliminary nature and did not involve any climbing or detailed investigation beyond what was visible from accessible points at ground level. Where a more detailed assessment/inspection of a particular feature is deemed necessary it is recommended in the site survey data.

The focus of the survey is to determine the suitability for the retention of trees within a proposed development in accordance with BS583:2012 Trees in relation to design, demolition and construction - recommendations; it does not relate to minor risks associated with trees such as poisoning after ingestion, debris from leaf litter or seeds/fruit.

Trees located outside of the site perimeter have been noted during the site survey where they pose an above ground risk, however, their exact location and measurements may have been visually estimated due to lack of access. The position of trees on the accompanying site plan may have been estimated.

[2] *Building near trees.* NHBC Standard, Chapter 4.2, National House-Building Council, UK (2014).
[3] Guidelines for the Planning, Installation and Maintenance of Utility Apparatus in Proximity to Trees. NJUG 10, Volume 4.

BS5837:2012 provides the following guidance relating to levels of information required for planning:

DELIVERY OF TREE-RELATED INFORMATION INTO THE PLANNING SYSTEM:

Stage	Minimum detail	Additional information
Pre-application	• Tree survey.	• Tree retention/removal plan – draft.
Planning application	• Tree survey. • Tree retention/removal plan (final). • Retained trees and RPAs shown on proposed layout • Strategic hard and soft landscape design, including species and location of new tree planting • **Arboricultural impact assessment**	• Existing & proposed levels. • Tree protection plan (TPP). • Arboricultural method statement (heads of terms). • Details for all special engineering within the RPA and other relevant construction details.
Reserved matters/ planning conditions	• Alignment of utilities (including drainage), where inside the RPA or where installed using a trenchless method. • Dimensioned TPP & Detailed AMS. • Schedule of works to retained trees. • Detailed hard/soft landscape design.	• Arboricultural site monitoring schedule. • Tree and landscape management plan. • Post construction remedial works. • Landscape maintenance schedule.

ARBORICULTURAL IMPACT ASSESSMENT (INFORMATION REQUIRED):

- Evaluation: Impact of tree losses.
- Effect of construction on amenity value.
- Shadow influence on dwellings/buildings/amenity space.
- End use of space near retained trees - risk assessment.
- Designations: Tree Preservation Orders / Conservation Areas.
- Potential incompatibilities between layout and retained trees.
- Potential for new planting to provide mitigation for any losses.
- Canopy protection during construction (extension of RPA).
- Pruning works to facilitate development.
- Future pressure for tree removal.
- Direct & Indirect Damage.
- Proximity of trees to structures.
- Excavations or changes in ground levels near retained trees.
- Installation of hard surfacing in RPAs.
- Infrastructure requirements – services etc.
- Removal of existing structures and hard surfacing.
- Construction: access, working space, storage of materials/topsoil.

6.1 Aspect Tree Consultancy
Tree Survey

ASPECT TREE CONSULTANCY

BS5837:2012 - CASCADE CHART FOR TREE QUALITY ASSESSMENT

Category and definition	Criteria			Identification on plan
Category U Those in such a condition that they cannot realistically be retained as living trees in the context of the current land use for longer than 10 years.	• Trees that have a serious, irremediable, structural defect, such that their early loss is expected due to collapse, including those that will become unviable after removal of other U category trees (e.g. where, for whatever reason, the loss of companion shelter cannot be mitigated by pruning) • Trees that are dead or are showing signs of significant, immediate, and irreversible overall decline. • Trees infected with pathogens of significance to the health and/or safety of other trees nearby, or very low quality trees suppressing adjacent trees of better quality • NOTE Category U trees can have existing or potential conservation value which it might be desirable to preserve.			RED
Category and definition	**Criteria - Subcategories**			
	1 Mainly Arboricultural values	2 Mainly landscape values	3 Mainly cultural values	Identification on plan
Category A Trees of high quality with an estimated remaining life expectancy of at least 40 years	Trees that are particularly good examples of their species, especially if rare or unusual, or those that are essential components of groups, or of formal or semi-formal Arboricultural features (e.g. the dominant and/or principal trees within an avenue)	Trees, groups or woodlands of particular visual importance and/or landscape features.	Trees, groups or woodlands of significant conservation, historical, commemorative or other value (e.g. veteran trees or wood-pasture)	GREEN
Category B Trees of moderate quality with an estimated remaining life expectancy of at least 20 years.	Trees that might be included in the high category, but are downgraded because of impaired condition (e.g. presence of remediable defects including unsympathetic past management and storm damage), such that they are unlikely to be suitable for retention for beyond 40 years; or trees lacking the special quality necessary to merit the Category A designation	Trees present in numbers usually growing as groups or woodlands, such that they attract a higher collective rating than they might as individuals; or trees occurring as collectives but situated so as to make little visual contribution to the wider locality.	Trees with material conservation or other cultural benefits	BLUE
Category C Those of low quality and value with an estimated remaining life expectancy of at least 10 years, or young trees with a stem diameter below 150mm	Unremarkable trees of very limited merit or such impaired condition that they do not qualify in higher categories	Trees present in groups or woodlands, but without this conferring on them significantly greater landscape value, and/or trees offering low or only temporary screening benefit	Trees with no material conservation or other cultural benefits	GREY

Tree Survey - Key		*Age Class:*		*Condition:*		Label/Tag Number:	
HGT:	Height in Metres.	**NP:**	New Planting	**P = Physiological**		**H:**	Hedge
ST Ø:	Stem Diameter in millimetres.	**Y:**	Young (1/5th of life expectancy)	**Good**	No significant health problems	**T:**	Individual Tree
Cr RAD:	Estimated average canopy radius to compass points.	**SM:**	Semi mature (2/5th of life expectancy)	**Fair**	Symptoms of ill health that can be remediated	**G:**	Tree group
CH:	Estimated height of crown clearance.	**EM:**	Early mature (3/5th of life expectancy)	**Poor**	Symptoms of ill health that cannot be remediated	**W:**	Woodland
		M:	Mature (4/5th beyond life expectancy and declining naturally)	**S = Structural**		**#:**	Off site
Est Cont:	Estimated remaining contribution in years.	**OM:**	Over Mature (5/5th of life expectancy)	**Good**	No significant structural issues		
Rad RPA:	Radial Root Protection Area in metres from stem centre.	**V:**	Veteran (of great age for its species or possibly of conservation value)	**Fair**	Structural issues that can be remediated	*BS5837 Category (colour coded)*	
12/9:	RPA Reduced.			**Poor**	Structural issues that cannot be remediated		

BS Cat – *Category of retention* **U:** *Removal* **A:** *High quality/value* **B:** Moderate quality/value **C:** *Low quality/value* **e:** *Estimated*

Notes: *Tree measurements up to 10m have been rounded to the nearest half meter. Measurements over 10m are rounded to nearest metre.*

Key Tree : *Trees of such stature or landscape significance that they warrant consideration as a constraint.*

ASPECT: 05592 REGISTER OFFICE SURVEY BS5837:2012

Surveyor: R. Fletcher
Weather: Calm, clear sky

Survey date: 03.03.21

Tree Ref	Species	HGT	St Ø	Cr Rad				Cr Hgt	Age class	Physiological & Structural con'd Observations –ve/+ve Preliminary Management Recommendations	Est Cont	RPA	BS Cat
				N	E	S	W						
T1	Norway Maple (Acer platanoides)	13	690	6	6	6	6	2.5	M	P: Good S: Good • Exposed, damaged roots. • Previously reduced on north-east side. • Modified RPA.	20+	8.3	B1
T2	Silver Birch (Betula pendula)	14	310	3	3.5	3	3.5	1.5	M	P: Good S: Good • Tag 909.	20+	3.7	B1
T3	Silver Birch (Betula pendula)	14	460	3	5	4	4	4	M	P: Good S: Fair • Tag 908. • Exposed roots. • Minor deadwood. • Modified RPA.	20+	5.5	B1
T4	Norway Maple (Acer platanoides)	13	530	6	6	6.5	6	2	M	P: Good S: Good • Tag 907.	20+	6.4	A1
T5	Silver Birch (Betula pendula)	11	310	2.5	2.5	2.5	2.5	2.5	EM	P: Fair S: Good • Poor pruning cuts to 3m, partially occluded.	20+	3.7	B1
T6	Silver Birch (Betula pendula)	10	410	4	4	3	3.5	2.5	M	P: Good S: Good • Tag 905. • Poor pruning cuts on lower canopy on south side.	20+	4.9	B1

6.1 Aspect Tree Consultancy
Tree Survey

ASPECT: 05592 REGISTER OFFICE SURVEY BS5837:2012

Surveyor: R. Fletcher
Weather: Calm, clear sky

Survey date: 03.03.21

Tree Ref	Species	HGT	St Ø	Cr Rad N	Cr Rad E	Cr Rad S	Cr Rad W	Cr Hgt	Age class	Physiological & Structural con'd Observations –ve/+ve Preliminary Management Recommendations	Est Cont	RPA	BS Cat
T7	Common Lime (Tilia X europaea)	16	1050	6	6	6	6	3	M	P: Good S: Good • In raised bed. • Previously reduced. • Tree located off site. • Modified RPA.	20+	12.6	B1
T8	Silver Birch (Betula pendula)	9	190	2	2	2	2	3	EM	P: Good S: Good • Tag 904. • In raised bed, limited rooting space. • Modified RPA.	10+	2.3	C1
T9	Norway Maple (Acer platanoides)	9	460	5	5	5	5	1.5	M	P: Good S: Good • Exposed, damaged roots. •	20+	5.5	B1
T10	Silver Birch (Betula pendula)	9	250	2	2.5	3	3	1.5	EM	P: Good S: Good • Lower canopy previously reduced on east and south side	20+	3.0	B1
T11	Norway Maple (Acer platanoides)	9	250	4	4	4	4	2.5	M	P: Poor S: Fair • Tag 916.	10+	3.0	C1
T12	Prunus species (Cherry Species)	8	370	4.5	4.5	4.5	4.5	1.5	M	P: Poor S: Fair • Tag 915. • Exposed roots. • Decay in center of main union at 2m.	10+	4.4	C1

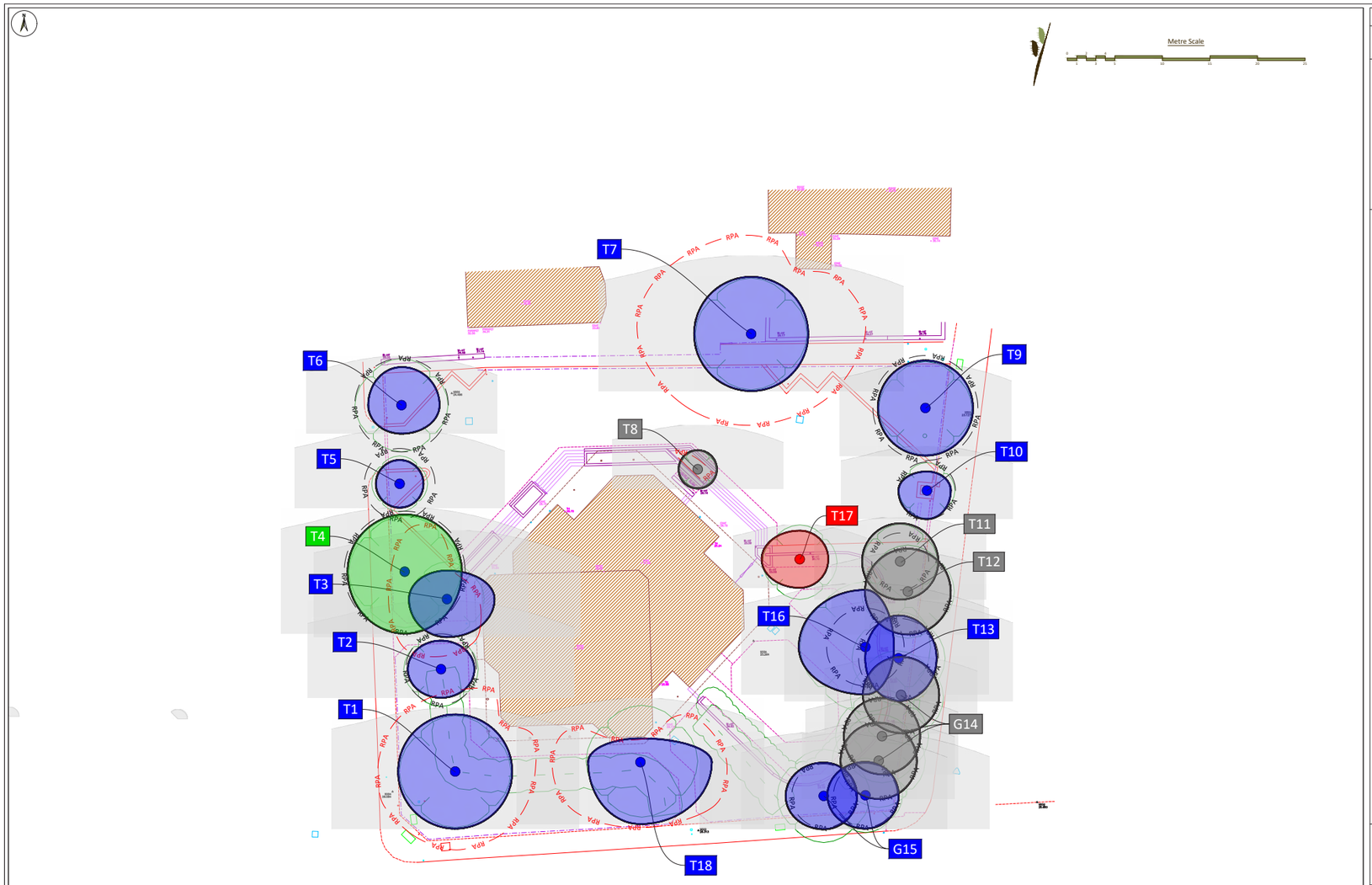
ASPECT: 05592 REGISTER OFFICE SURVEY BS5837:2012

Surveyor: R. Fletcher
Weather: Calm, clear sky

Survey date: 03.03.21

Tree Ref	Species	HGT	St Ø	Cr Rad				Cr Hgt	Age class	Physiological & Structural con'd Observations –ve/+ve Preliminary Management Recommendations	Est Cont	RPA	BS Cat
				N	E	S	W						
T13	Silver Birch (Betula pendula)	12	350	4.5	4	4.5	3.5	3	EM	P: Good S: Good • Tag 904.	20+	4.2	B1
G14	Cotoneaster Species (Cotoneaster Species	8	329	4	4	4	4	1	EM	P: Good S: Fair • Exposed roots, one stump. • Multiple stems at ground level.	10+	4.0	C2
G15	Silver Birch (Betula pendula)	13	280	3.5	3.5	3.5	4	2	EM	P: Good S: Fair	20+	3.4	B2
T16	Ash (Fraxinus excelsior)	13	340	6	3	5	7	2	M	P: Fair S: Good • Tag 918. • Ash Dieback disease likely to limit life expectancy.	10+	4.1	B1
T17	Prunus species (Cherry Species)	7	500	3	3	3	4	2	M	P: Poor S: Fair • Eastern half of crown is dead. • Previously reduced.	<10	6.0	U
T18	Prunus species (Cherry Species)	13	600	2.5	7.5	6.5	5.5	1.5	M	P: Good S: Fair • Previously reduced on top and northern side. • Modified RPA.	20+	7.2	B1

6.1 Aspect Tree Consultancy
Aspect Tree Plan



KEY

BS 5837:2012 Tree Category

A B C U

TREE CONSTRAINTS INFORMATION

- TAG — Tree / Group Reference (by category)
- Individual tree (by category)
- Tree group/hedge (by category)
- Root protection area - RPA (BS5837)
- RPA Modified due to site conditions
- Shade arc - Axciscape

DESIGN & LAYOUT OPPORTUNITIES

- TAG — **Tree Preservation Order - TPO**
- **Aged/Veteran Tree - NPPF**
- **KEY Feature**

Documents/plans supplied by client for use in this drawing:
Topo Survey 6273-24FEB21-01-02

Accompanying documents which must be read in conjunction with this drawing:
05592 Tree Survey 03.03.21

Notes

- All dimensions are in metres, unless otherwise stated.
- The original of this drawing was produced in colour, a monochrome version should therefore not be relied upon.

Client:	Form Design Group		
Project:	Plymouth Register Office		
Title:	Tree Constraints Plan		
Date:	11/03/2021	Sheet:	1 of 1
Scale:	1/200@ A1	Drawn:	RF
Scale:	1/400@ A3	Checked:	RF
Dwg Ref:	05592 TCP 11.03.21		

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6.2 AWP
Redevelopment Infrastructure Due Diligence Report

Plymouth Register Office Redevelopment

Hoe Neighbourhood Forum

Infrastructure Due Diligence Report



Plymouth Register Office Redevelopment

Infrastructure Due Diligence Report

Job Title	Plymouth Register office
Project Number	1024
Date	19 March 2021
Revision	D1
Client	Hoe Neighbourhood Forum
Prepared by	I Awcock
Checked by	R Ward
Authorised by	I Awcock
File Reference	P:\1024 Plymouth Register Office, Plymouth\C Documents\1024 Plymouth Register Office - Redevelopment Infrastructure Due Diligence Report D1 2021.03.19.docxP:\1024 Plymouth Register

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6.2 AWP
Redevelopment Infrastructure Due Diligence Report

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1 Introduction 1
2 Highways 3
3 Drainage Requirements 7
4 Utilities 11
5 Summary & Conclusions 14

Appendices

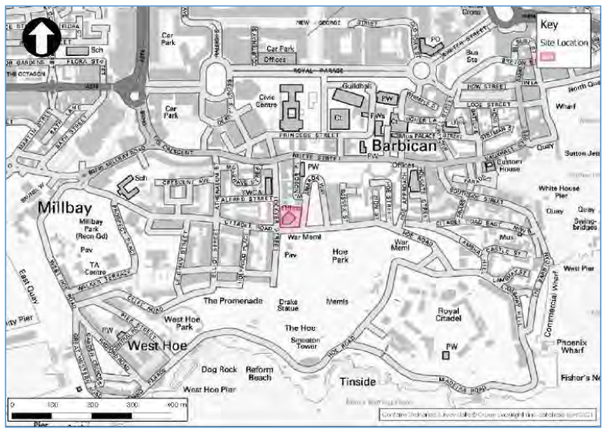
Appendix A Drawings
Appendix B Drainage Modelling and Preliminary Drainage Layout
Appendix C Utility Records

1 Introduction

1.1 The former Plymouth Register Office is being considered for redevelopment within the emerging Hoe Neighbourhood Plan. AWP have been instructed by the Hoe Neighbourhood Forum to contribute to a development brief for the site by undertaking a Infrastructure Due Diligence review.

1.2 The site is located to the south of Plymouth City Centre adjacent to Armada way and immediately north of Plymouth Hoe as shown in Figure 1.1.

Figure 1.1 Site Location Plan



1.3 Initial development proposals have been prepared against which to benchmark infrastructure requirements and the initial site layout is contained in Appendix A and is as shown in Figure 1.2 below.

1.4 Th sustainability of the location has been considered as well as the access arrangements and parking requirements / provision.

1.5 The likely requirements for drainage have been considered and potential requirements for site storage assessed.

1.6 The existing utility constraints on the site have been considered by obtaining records and an initial high level review of the capacity to serve the site as been undertaken.

Figure 1.2 Initial site masterplan



1.7 This report sets out the findings in respect of highways, drainage and utilities and sets out the approach recommended for taking forward the technical aspects of redeveloping the site.

2 Highways

2.1 The site is surrounded on the south, east and west side by existing public highway in Citadel Road, Armada Way and Locker St. To the north the site boundary is formed by a footpath connecting Locker St to Armada Way and provided rear access to properties on Windsor Place.

2.2 HMPE records should be obtained from Plymouth City Council to confirm the extent of public highway and the rights of access along the path across the northern site boundary should be confirmed.

Accessibility to facilities

2.3 Situated within 400m or a 5 minute walk of the southern edge of the city centre the site is well located for access to all the retail, leisure and healthcare opportunities in the city centre as shown on Figure 2.1 in Appendix A.

2.4 Within a 5 minute walk are 2 local foodstores on Vauxhall St as well as numerous other small shops, takeaway food establishments or restaurants.

2.5 The leisure areas in the Barbican or at West Hoe are equally only around 5 minutes' walk away.

2.6 Bus services are available on Notte St or on Grand Parade where most of Plymouth CityBus services converge meaning buses to any employment location in the city can be reached within a 5 minute walk time.

2.7 Plymouth railway station can be reached within a 20 minute walk or 7 minute cycle up Armada Way providing regular and frequent rail links into Cornwall or to Exeter and Devon and then beyond to Bristol, the rest of the UK or London.

2.8 Areas of employment around the city centre at Cattedown or Stonehouse can be reached in around 10 minutes by bike with Devonport naval base only a 15 minute cycle ride.

2.9 The site is well connected into the Plymouth Cycle Network with both Armada Way and Citadel Road identified as Advisory Cycle routes (in yellow) on the extract from Plymouths cycle route map in Figure 2.2 below.

6.2 AWP
Redevelopment Infrastructure Due Diligence Report

Figure 2.2 Plymouth Cycle Route Maps extract



2.10 The site is therefore located in a highly sustainable location with every chance that a high proportion of local journeys will be undertaken by active travel modes of transport.

Parking

2.11 The recently adopted Plymouth and South West Devon Joint Local Plan SDP (SDP) sets out standards to be applied for car parking in developments.

2.12 Policy Dev29.3 identifies parking ratios irrespective of location in Table 30 as set out below:

Type/size of development	Indicative parking provision
1 bedroom dwellings	1 space per dwelling
2 bedroom dwellings	2 spaces per dwelling
3 bedroom dwellings	2 spaces per dwelling
4 bedroom dwellings	3 spaces per dwelling
HMOs	1 space per 2 bed spaces
Purpose-built student accommodation (PBSA)	The number of spaces will be looked at on a case-by-case basis and based on location and presence of a CPZ. A suitable number of spaces for the purposes of drop-off should be provided.

Table 30 Indicative car parking provision for new residential development

2.13 The site is situated within a Plymouth controlled parking zone, Zone H, which allows for on street pay and display parking with residents permits for resident parking spaces at £30/yr.

2.14 The Plymouth approach to car free development is set out in para 8.13 of the SDP which states:

> **8.12** Car-free development can enable higher housing densities to be achieved on development sites, create pedestrian and child-friendly streetscapes, and help to embed sustainable travel habits among residents. They may be appropriate in certain areas throughout the Plan Area and will be considered on a case-by-case basis alongside any evidence to support it.
>
> **8.13** If a car-free development is proposed, the LPAs will carefully consider:
>
> - The location and accessibility of the site;
> - Any existing residents parking schemes;
> - The proximity of the development to public transport;
> - Whether there are good cycle links;
> - The potential for overspill parking and the potential impact on the surrounding areas; and,
> - Any proposed measures or features of the development designed to enable and ensure that car-free living can be achieved throughout the design life of the development.

2.15 As set out above the site is in a highly sustainable location and situated within a controlled parking zone. Then initial feasibility scheme proposes 32 homes comprising 12 x 1 bed, 16 x 2 bed and 4 x 3 bed. Following the standards set in Table 30 of the SDP would result in a parking requirement of 52 spaces which appears counterintuitive given the sustainable location of the site.

2.16 Off street parking is proposed to be provided at the site with 16 spaces at a ratio of 0.5 per dwelling or 0.31per bed space. Alternatively all 4 the 3 bed homes and 4 of the 2 bed homes could be allocated spaces to accord with Table 30 and the remaining twenty four 2 bed and 1 bed homes be considered as car free.

2.17 SDP Policy 29.5 promotes EV charging facilities with a requirement set out in Table 33 that 25% of parking bays (4 spaces) be provided with dedicated fee standing weatherproof standard charging points and 50% of remaining spaces (6 spaces) be serviced with passive wiring to allow future charge point connection.

2.18 Cycle parking will be required which can be in a communal store for apartments ideally at a level of 1 space per bedroom. The provision of cycle storage will be trade off against amenity space or private storage in the home and so a design led discussion on provision of cycle parking should be encouraged.

Highway Access

2.19 The existing Register Office car park has 2 points of access: from Locker Street and onto Armada Way. The existing arrangements are shown on the site topographical survey contained in Appendix A.

2.20 Proposed access arrangements will follow the existing and site access plans are set out on drawings 1024/PHL/1001 contained in Appendix A.

2.21 This through driveway arrangement would allow for service vehicles and refuse collection to enter and exit the site. Site management access control will need to ensure that a delivery vehicle or refuse truck has unencumbered access to the site to ensure no blocking of Lockyer St.

3 Drainage Requirements

3.1 As is the case nationally under policies in the NPPF and in accordance with Plymouth City Council LLFA planning policy, development sites are required to either infiltrate surface water to the ground or attenuate surface water on site prior to discharge to a suitable watercourse or sewer.

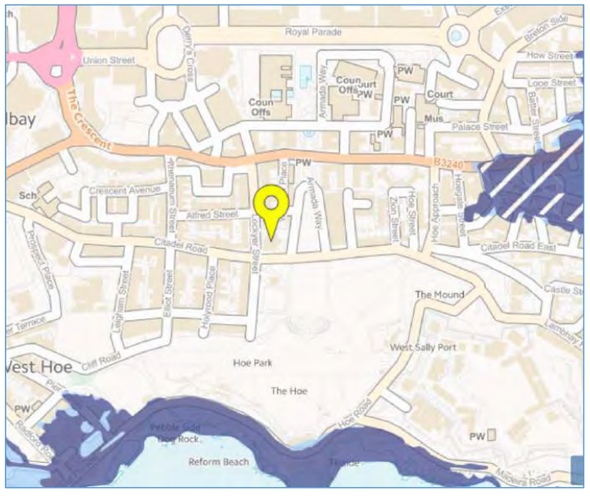
3.2 This section of this Report sets out:

- The current flood risk status of the site.
- The existing sewers on site.
- The anticipated SuDS requirements and provision for surface water drainage connections.
- The anticipated sewerage connection requirements and potential connection opportunities.

Existing Flood Risk

3.3 The site is located within 'Flood Zone 1', having less than 1 in 1,000 annual probability of river or sea flooding (<0.1%) as shown in Figure 3.1 below:

Figure 3.1 Flood Zones



3.4 The flood risk due to surface water has also been assessed using the direct.gov mapping, reproduced as figure 3.2 below.

3.5 The mapping is based on LIDAR data and indicates the typical conveyance routes of surface water runoff in up to the 100 year return period (medium to high risk).

Figure 3.2 Flooding from Surface Water map



3.6 As you would expect in a built-up environment, flooding from surface water is contained within the existing highway network, however, note that this mapping makes no allowance for any existing highway drainage, which in reality would direct some of this surface water into the ground.

3.7 There are no surface water sheet flows across the site and that risk is therefore minimal. Future development should account for surface water flows by reviewing overland flood flows routes against the proposed levels to ensure that if any surface water flooding was to occur; this water would be directed by a safe route away from building thresholds, replicating the existing scenario.

Existing Surface Water Drainage

3.8 The existing Registry Office site was occupied by the building and car parking as well as landscaping and other green space.

3.9 SWW mapping contained in Appendix C indicates no existing surface water sewers on or around the site and that all existing surface water collection is therefore routed to combined sewers in Armada Way or Lockyer St.

Potential surface water arrangements

3.10 The existing site is brownfield and surface flows currently flow unattenuated into the existing network, which connects to a combined network downstream.

3.11 The proposed development is located within a Critical Drainage Area and would be required to submit a Flood Risk Assessment and surface water drainage strategy in accordance with the Plymouth Local Flood Risk Management Plan.

3.12 Surface water from the proposed development should be discharged in a separate surface water drainage system which should be discharged according to the following hierarchy:

- Discharge to a waterbody (if available and with sufficient capacity).
- Infiltration
- Discharge to a surface water sewer, highway drain or culverted watercourse with attenuation as required.

3.13 A surface water drainage strategy or flood risk assessment should be submitted that demonstrates that the proposed drainage system, including any attenuation, can provide a 1% AEP standard of protection plus a 40% allowance for climate change.

3.14 No waterbody is available on site and so the Defra Magic database has been inspected to determine the likely suitability of the geology on the site for infiltration. This suggested that the underlying spoils are anticipated to be "FREELY DRAINING" and so may be suitable for soakaway drainage which should be provided by BRE365 compliant soakaway testing.

3.15 Should soakaways not be a possible means of disposal of surface water from the site then attenuation prior to discharge to the adjacent sewers would be proposed.

3.16 An initial assessment of the attenuation storage requirements based on Plymouth LLFA standard CDA requirements for a brownfield site as has been undertaken.

3.17 The MicroDrainage Source Control module has been used to determine the attenuation requirements for the proposed development. The output of these models can be seen within Appendix B of this Technical Note, and the results based upon PCC policy suggest the parameters set out in Table 3.1 below:

Table 3.1 Initial SuDS Attenuation parameters

Catchment	0.161ha
Hydraulic Control	Hydrobrake Ref: MD-SHE-066-1500-0400-1500
Porosity	95%
Dimension	7.0m x 38.0mx0.4m
100yr+40%CC	Volume 411.5m3
100yr+40%CC	Discharge 1.5 l/s

3.18 The drawing included within Appendix B (reference 1024-PDL-101) shows a preliminary drainage layout for the site.

3.19 In addition to the potential for soakaways to act as the main discharge for roof water on the site the car parking areas could also be constructed in porous paving.

3.20 Landscape areas could also be used to provide rain gardens or other open water landscape features to improve water quality prior to discharge.

3.21 It is therefore considered that the site can comply with Plymouth CDA guidance and deliver a significant reduction in existing surface water discharges with consequent local betterment in sewer flows.

Foul Strategy

3.22 A 225mm diameter SWW combined sewer is indicated to the west of the site in Lockyer Street, and a 225mm diameter SWW combined sewer is indicated along the north boundary of the site that connects to a 225mm diameter SWW combined sewer to the east of the site in Armada Way.

3.23 SWW are expected to confirm that adequate capacity exists in the sewer network for replacement of the existing Register Office building with 32 apartments.

4 Utilities

4.1 The site is located in a city centre location with an existing building with all utilities suppliers previously connected.

Existing Utilities

4.2 Utility records have been obtained to ascertain which providers hold assets within the locality of the existing site. The output of this exercise is summarised in Table 4.1 below and on drawing 1024/UD/1001 which is contained along with the utility records in Appendix C.

Table 4.1 – Existing Utilities

Utility Type	Utility Provider	Plant Location & Type
Electricity	Western Power Distribution	Offsite: LV ducting in Armada Way Citadel Road and Lockyer St; HV 11KV routes in northern footpath of Citadel Road and western footpath of Locker St. Onsite: Lighting pilar connection in NW corner of car park; lighting connections in landscaping along Citadel Road frontage; main service connection into building from Citadel Road
Water Supply	South West Water	Offsite: 6 inch water main in the eastern footpath of Lockyer St. 4 inch in public footpath across northern site boundary. Onsite: 9 inch main across the SW corner of the site – potentially providing the service connection to the site.
Gas	Wales and West (W&W)	Offsite: 63dia LP in western footpath of Armada way; 75dia LP in footpath along northern site boundary; 90dia LP in eastern footpath of Lockyer St. Onsite: 63 dia LP connection into register office building from western footpath of Armada way
Telecoms	BT Openreach	Offsite: Ducts in western footpath of Armada way Onsite: Connection into registry Office building from western footpath pf Armada Way.
Telecoms	Virgin Media	Offsite: Ducting in eastern footpath of Locker St and northern footpath of Citadel Rd.

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Redevelopment Infrastructure Due Diligence Report

Utility Type	Utility Provider	Plant Location & Type
		Onsite: Connection to Registry Office from eastern footpath of Lockyer St.

Future Utility Loading

4.3 No gas will be permitted in future developments so not included I this appraisal.

4.4 An initial appraisal based upon information available and experience has been undertaken to assess the likelihood of reinforcement being required.

4.5 To fully confirm likely connection costs applications to the relevant utility provider should be made.

Electricity

4.6 New homes typically are provided with a 15KvA allowance per home requiring 480KvA or 0.5MVA potential supply.

4.7 Inspection of WPD records indicated that the site would be expected to be served from the Adelaide Road substation which currently has a headroom of 9.99MVA.

4.8 It is therefore expected that electricity can be provided from the 11KV network around the site.

Water

4.9 SWW typically work on around 120l/day per head and with previous usage at the registry Office and a 9 inch main in close proximity capacity is expected to be available for the proposed development.

Telecoms

4.10 Both BT Openreach and Virgin Media have services in the footpaths around the site. It is therefore expected that both broadband and telephone lines can be provided with no abnormal costs.

District Heating

4.11 Plymouth City Council are promoting a district heat network which may reach to this site and so it is anticipated that PCC may require a contribution to that as part of a planning obligation.

4.12 Connection to the network if implemented may provide sustainability benefits as the site.

5 Summary & Conclusions

5.1 The former Plymouth Register Office is being considered for redevelopment within the emerging Hoe Neighbourhood Plan. AWP have been instructed by the Hoe Neighbourhood Forum to contribute to a development brief for the site by undertaking a Infrastructure Due Diligence review.

5.2 Initial development proposals have been prepared against which to benchmark infrastructure requirements. The highways, drainage and utilities constraints and requirements have been reviewed and recommendations made for taking forward the technical aspects of redeveloping the site.

5.3 The site is located in a highly sustainable location with every chance that a high proportion of local journeys will be undertaken by active travel modes of transport. Situated within a controlled parking zone, parking is proposed which reflects the sustainable location reflecting that some homes are likely to be car free. EV charging and cycle parking is recommended to be provided.

5.4 Use is proposed of the 2 existing points of access from Lockyer St and onto Armada way which provide safe and suitable access for residents as well as service and refuse vehicles.

5.5 Surface water drainage will be required to accord with Plymouth critical drainage area requirements and it may be possible to infiltrate to the ground in appropriately sized and configured soakaways. If that is not possible an attenuated discharge to the existing adjacent sewers is proposed.

5.6 Foul drainage will be provided through connection to the existing adjacent sewers in Lockyer St or Armada Way.

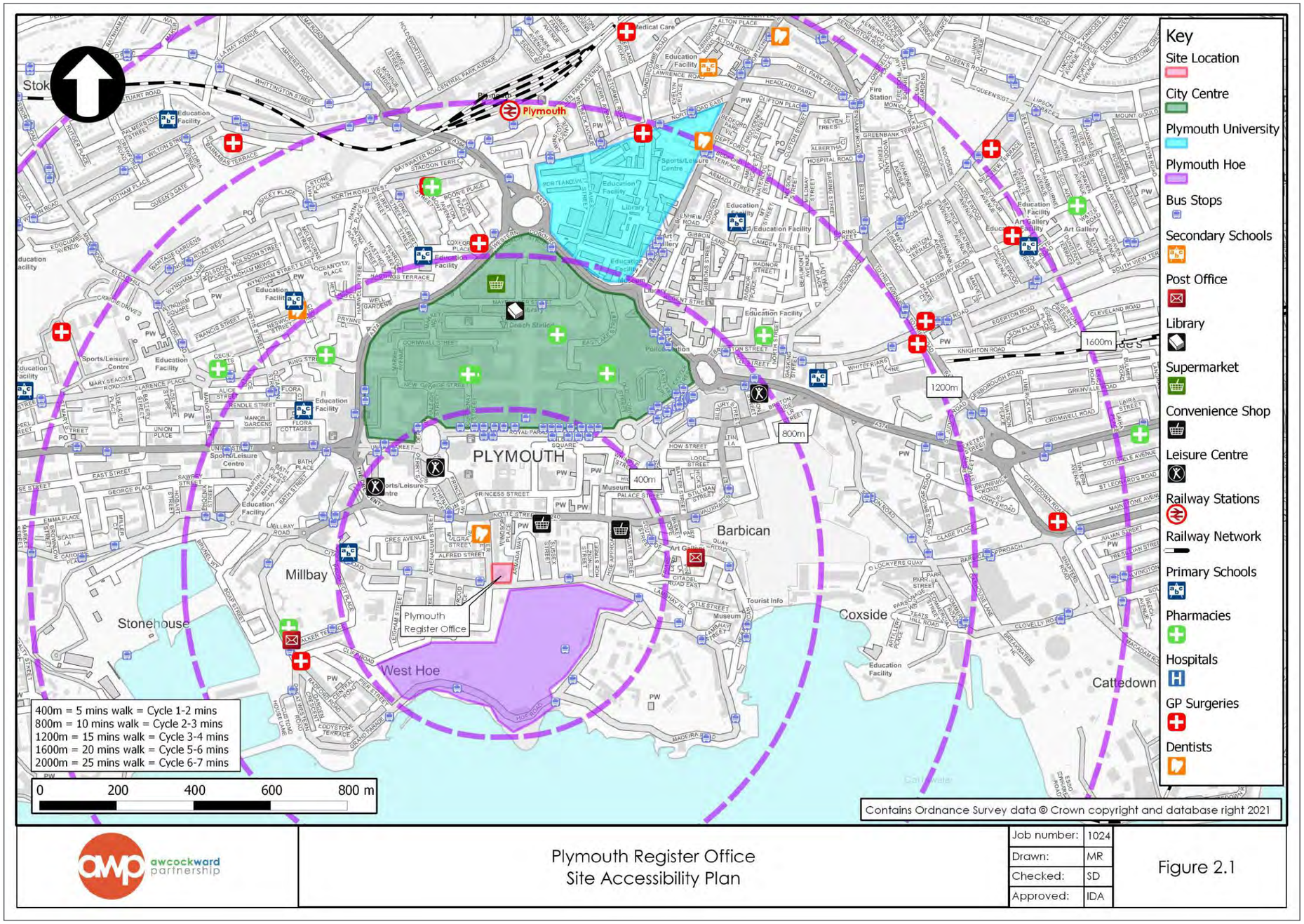
5.7 The existing utilities on and around the site have been reviewed and there are not expected to be any services which would be a constraint to development. Future connections are expected to be able to be provided at no abnormal cost.

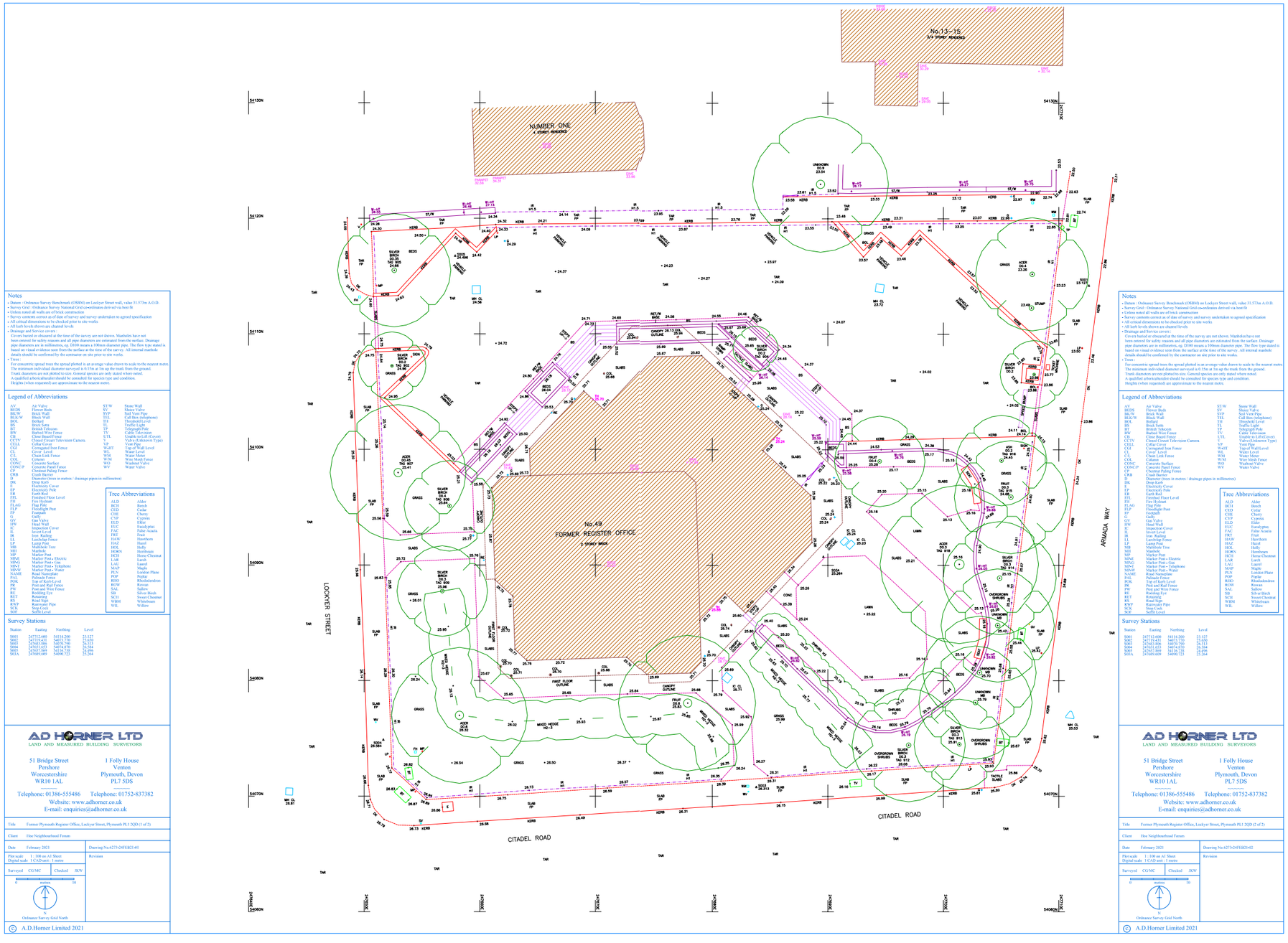
5.8 No access drainage or utilities technical matters have been identified at the site that would prevent the site being redeveloped as proposed.

AWP

Appendix A Drawings

6.2 AWP
Redevelopment Infrastructure Due Diligence Report





Notes

- Datum - Ordnance Survey Benchmark (OSBM) on Lockyer Street wall, value 31.573m A.O.D.
- Survey Grid - Ordnance Survey National Grid coordinates derived via best fit
- Unless noted all walls are of brick construction
- Survey contents correct as of date of survey and survey undertaken to agreed specification
- All critical dimensions to be checked prior to site works
- All kerb levels shown are channel levels
- Drainage and Service covers :
  Covers buried or obscured at the time of the survey are not shown. Manholes have not been entered for safety reasons and all pipe diameters are estimated from the surface. Drainage pipe diameters are in millimetres, eg. D100 means a 100mm diameter pipe. The flow type stated is based on visual evidence seen from the surface at the time of the survey. All internal manhole details should be confirmed by the contractor on site prior to site works.
- Trees :
  For concentric spread trees the spread plotted is an average value drawn to scale to the nearest metre. The minimum individual diameter surveyed is 0.15m at 1m up the trunk from the ground. Trunk diameters are not plotted to size. General species are only stated where noted. A qualified arboriculturalist should be consulted for species type and condition. Heights (when requested) are approximate to the nearest metre.

Legend of Abbreviations

AV	Air Valve	ST/W	Stone Wall
BEDS	Flower Beds	SV	Sluice Valve
BK/W	Brick Wall	SVP	Soil Vent Pipe
BOL	Bollard	TH	Threshold Level
BT	British Telecom	TP	Telegraph Pole
BW	Barbed Wire Fence	TV	Cable Television
CB	Close Board Fence	UTL	Unable to Lift (Cover)
CCTV	Closed Circuit Television Camera.	VP	Valve (Unknown Type)
CH	Chainlink	WALL	Wall
CGI	Corrugated Iron Fence	WallT	Top of Wall Level
CL	Cover Level	WL	Water Level
COL	Concrete Post Fence	WM	Wire Mesh Fence
CONC	Concrete	WM	Wire Mesh Fence
CONC	Concrete Surface	WO	Washout Valve
CONC/P	Concrete Panel Fence	WV	Water Valve
CP	Chestnut Paling Fence		
D	Diameter		
D	Diameter (trees in metres / drainage pipes in millimetres)		
DK	Drop Kerb		
EC	Electricity Cover		
EP	Electricity Pole		
ER	Earth Rod		
FFL	Finished Floor Level		
FH	Fire Hydrant		
FLAG	Flagstone		
FLP	Floodlight Post		
FP	Footpath		
G	Garth		
GV	Gas Valve		
HW	Hedge Wall		
IC	Inspection Cover		
IL	Invert Level		
L	Lamp Post		
LL	Landedge Fence		
LP	Lamp Post		
MB	Multibole Tree		
MH	Manhole		
MM	Marker Post		
MM2	Marker Post x Electric		
MPG	Marker Post x Gas		
MPT	Marker Post x Telephone		
MWR	Marker Post x Water		
NAME	Road Nameplate		
PAL	Palisade Fence		
POK	Top of Kerb Level		
PP	Power / Light Pole		
PW	Post and Wire Fence		
RE	Rodding Eye		
RT	Retaining		
RS	Road Sign		
RWP	Rainwater Pipe		
SCK	Stop Cock		
SOF	Soffit Level		

Tree Abbreviations

ALD	Alder
BEE	Beech
CED	Cedar
CHE	Cherry
CYP	Cypress
ELD	Elder
EUC	Eucalyptus
FAC	False Acacia
FIG	Figtree
HAW	Hawthorn
HAZ	Hazel
HOL	Holly
HORN	Hornbeam
HS	Horse Chestnut
LAR	Larch
LAU	Laurel
MAP	Maple
PLN	London Plane
POP	Poplar
RHO	Rhododendron
SAC	Sallow
SAL	Sallow
SB	Silver Birch
SCH	Sweet Chestnut
WBM	Whitebeam
WIL	Willow

Survey Stations

Station	Easting	Northing	Level
S001	247712.600	541134.200	23.127
S002	247735.431	540717.770	23.430
S003	247683.806	540701.790	26.313
S004	247651.869	540736.870	26.304
S005	247657.869	540736.770	25.504
S03A	247689.609	540907.723	25.264

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Website: www.adhorner.co.uk
E-mail: enquiries@adhorner.co.uk

Title	Former Plymouth Register Office, Lockyer Street, Plymouth PL1 2QD (1 of 2)
Client	Hoe Neighbourhood Forum
Date	February 2021
Drawing No.	8273-24FHR01-01
Plot scale	1 - 100 on A1 Sheet
Digital scale	1 CAD unit - 1 metre
Revisions	
Surveyed	CG/MC
Checked	JKW

0 metres 10

N
Ordnance Survey Grid North

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0 metres 10

N
Ordnance Survey Grid North

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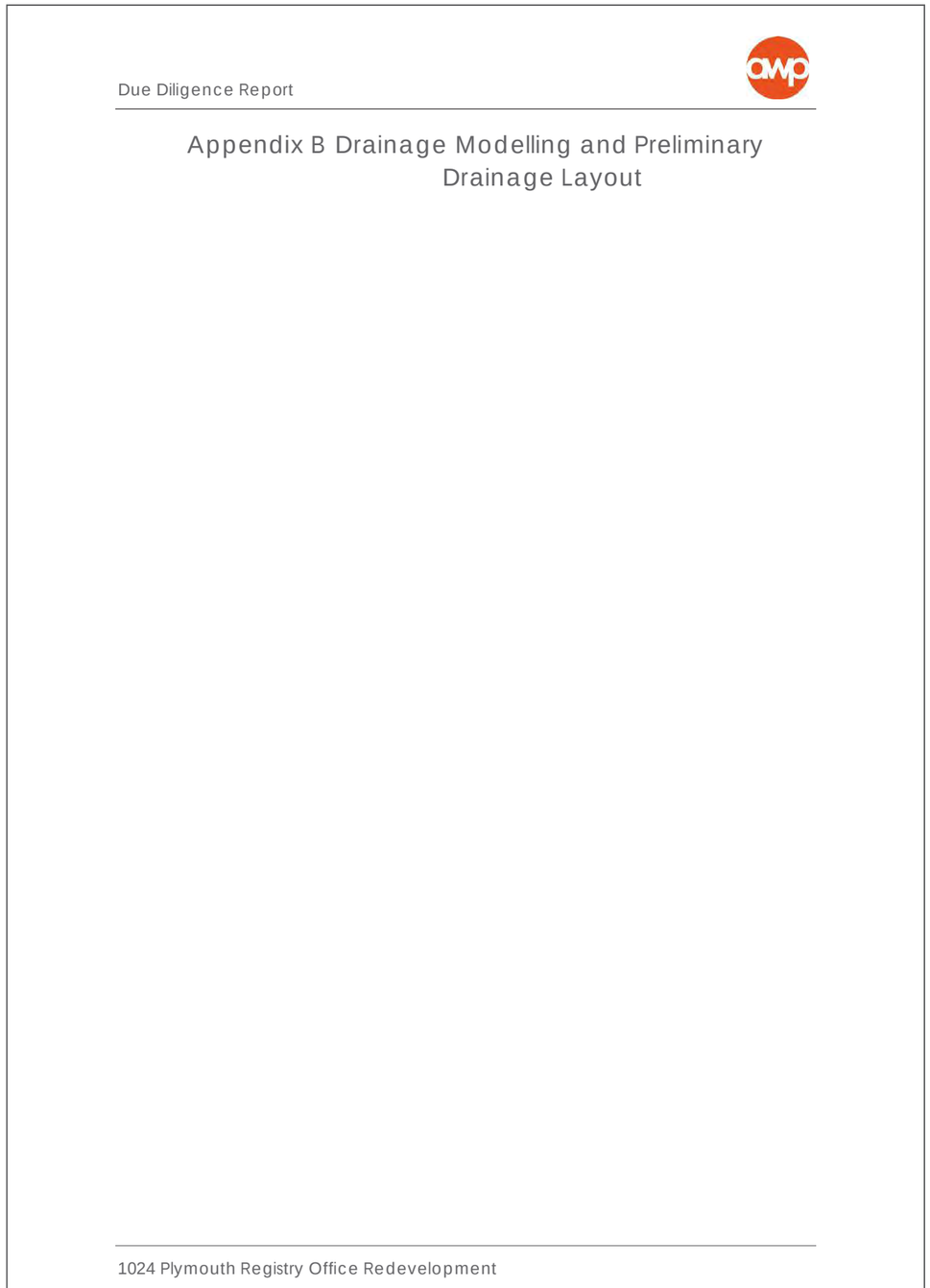
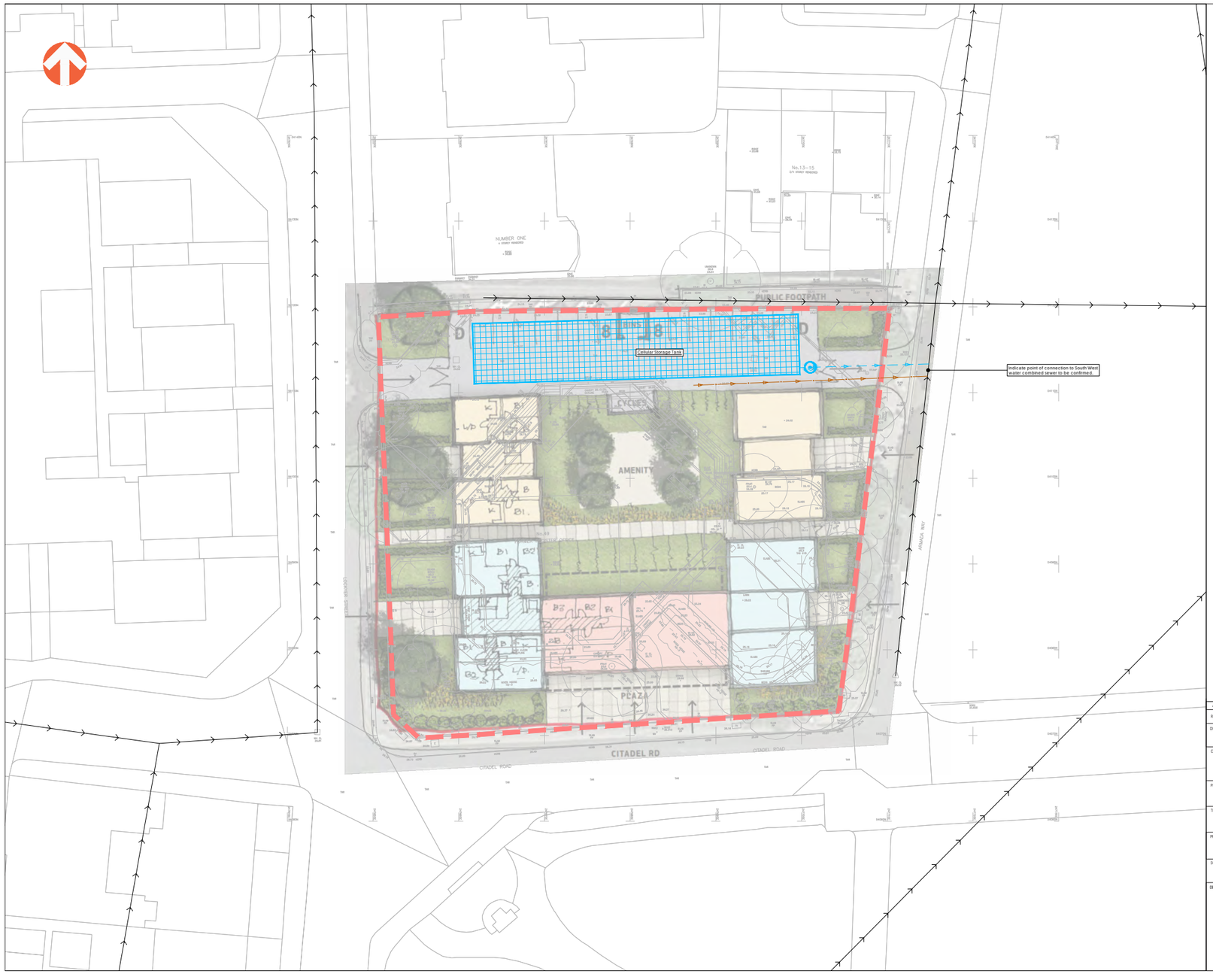
6.2 AWP
Redevelopment Infrastructure Due Diligence Report




Due Diligence Report

Appendix B Drainage Modelling and Preliminary Drainage Layout

1024 Plymouth Registry Office Redevelopment



Key:

- Net- Development Area
- Existing Combed Sewer

Proposed Drainage

- Cellular Storage Tank
- Surface Water Sewer
- Foul Water Sewer
- Flow Control Chamber

Area Summary Schedule

Net Developable Area	0.269 ha
Approx. impermeable Catchment	0.161 ha

Pre-Development (Greenfield) Runoff

The greenfield runoff rates have been assessed for the impermeable area only using the ICP SuDS Method, which is based on the IH124 Method, but for catchments of less than 50ha. The calculation excludes large areas of open space which will remain undeveloped.

Existing Greenfield Runoff Rates

Return Period	Greenfield Rate (l/s)
2yr	0.4
10yr	0.7*
30yr	0.8
100yr	1.1

*The site sits within the EA Plymouth CDA therefore the proposed discharge rates should be restricted to a maximum of the 10 year greenfield runoff rate for all storms up to and including the 100 year storm plus 40% allowance for climate change.
Due to the exceptionally low discharge rates for this development it is not practicable to discharge at the above calculated rates. In accordance with Plymouth City Council Local Flood Risk Management Strategy "For small or single property developments, a maximum surface water discharge rate of 1.5l/s may be required. This is the minimum rate considered technically practicable with flow control devices". At application stage we would recommend engaging with the PCC drainage officer to seek agreement for a marginally greater discharge rate which would reduce attenuation volumes.

Attenuation Summary

The MicroDrainage Source Control module has been used to determine the 100 year +40% climate change attenuation requirements). This has been shown indicative as cellular storage below. However we anticipate PCC LLFA will seek a SuDS solution, with potential to comprise use of under-drained permeable pavements and above-ground storage within the amenity space.

Cellular Storage

Ownership	Private
Catchment	0.161 ha
Hydraulic Control	Hydrobrake @L Ref: MD-SHE-0066-1500-0400-1500
Porosity	95%
Dimension	7.0 m X 38.0 m X 0.4 m
100yr+40% Volume Required	411.5 m^3
100yr+40% Discharge Rate	1.5 l/s

REV	DATE	DESCRIPTION	BY	CHK	APD
A	19.03.2021	INITIAL ISSUE	TMR	CPV	IDA

DRAWING STATUS: FOR INFORMATION ONLY

CLIENT: FORM DESIGN / LOCALITIES

PROJECT: PLYMOUTH REGISTER OFFICE, PLYMOUTH

TITLE: PRELIMINARY DRAINAGE LAYOUT

PROJECT No:	DRAWING No:	REV:
1024	01-PDL-1001	A

SCALE @ A1: 0 1:200 10 metres

DESIGN BY:

awcockward partnership
Awcock Ward Partnership, Kennington Court, Woodwaxen Park, Pynes Hill, Exeter, EX2 5TY
Tel: 01392 409007 Web: www.awpartner.com

6.2 AWP

Redevelopment Infrastructure Due Diligence Report

Awcock Ward Partnership Consulting Ltd		Page 1
Kensington Court Woodwater Park Pynes Hill Exeter EX2 5TY	1024-Plymouth Registry Office Greenfiled Runoff Estimates ICP SuDS (1:2yr event)	Micro Drainage
Date 17/03/2021 13:34 File 1024-A-101-Attenuation sizing....	Designed by Tom Checked by	
XP Solutions	Source Control 2018.1	

ICP SUDS Mean Annual Flood

Input

Return Period (years) 2 SAAR (mm) 1000 Urban 0.000
Area (ha) 0.161 Soil 0.300 Region Number Region 8

Results l/s

QBAR Rural 0.4
QBAR Urban 0.4

Q2 years 0.4

Q1 year 0.3
Q30 years 0.8
Q100 years 1.1

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Awcock Ward Partnership Consulting Ltd		Page 1
Kensington Court Woodwater Park Pynes Hill Exeter EX2 5TY	1024-Plymouth Registry Office Greenfiled Runoff Estimates ICP SuDS (1:10yr event)	Micro Drainage
Date 17/03/2021 13:33 File 1024-A-101-Attenuation sizing....	Designed by Tom Checked by	
XP Solutions	Source Control 2018.1	

ICP SUDS Mean Annual Flood

Input

Return Period (years) 10 SAAR (mm) 1000 Urban 0.000
Area (ha) 0.161 Soil 0.300 Region Number Region 8

Results l/s

QBAR Rural 0.4
QBAR Urban 0.4

Q10 years 0.7

Q1 year 0.3
Q30 years 0.8
Q100 years 1.1

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Summary of Results for 100 year Return Period (+40%)

Half Drain Time : 574 minutes.

Storm Event	Max Level (m)	Max Depth (m)	Max Infiltration (l/s)	Max Control (l/s)	Max Σ Outflow (l/s)	Max Volume (m³)	Status
15 min Summer	98.130	0.130	0.0	1.5	1.5	32.7	O K
30 min Summer	98.177	0.177	0.0	1.5	1.5	44.6	O K
60 min Summer	98.229	0.229	0.0	1.5	1.5	57.8	O K
120 min Summer	98.283	0.283	0.0	1.5	1.5	71.3	O K
180 min Summer	98.311	0.311	0.0	1.5	1.5	78.3	O K
240 min Summer	98.326	0.326	0.0	1.5	1.5	82.1	O K
360 min Summer	98.341	0.341	0.0	1.5	1.5	85.8	O K
480 min Summer	98.345	0.345	0.0	1.5	1.5	86.9	O K
600 min Summer	98.346	0.346	0.0	1.5	1.5	87.2	O K
720 min Summer	98.346	0.346	0.0	1.5	1.5	87.1	O K
960 min Summer	98.342	0.342	0.0	1.5	1.5	86.1	O K
1440 min Summer	98.327	0.327	0.0	1.5	1.5	82.4	O K
2160 min Summer	98.299	0.299	0.0	1.5	1.5	75.2	O K
2880 min Summer	98.265	0.265	0.0	1.5	1.5	66.8	O K
4320 min Summer	98.204	0.204	0.0	1.5	1.5	51.3	O K
5760 min Summer	98.155	0.155	0.0	1.5	1.5	39.1	O K
7200 min Summer	98.120	0.120	0.0	1.5	1.5	30.3	O K
8640 min Summer	98.097	0.097	0.0	1.5	1.5	24.5	O K
10080 min Summer	98.084	0.084	0.0	1.5	1.5	21.1	O K
15 min Winter	98.146	0.146	0.0	1.5	1.5	36.7	O K
30 min Winter	98.199	0.199	0.0	1.5	1.5	50.1	O K
60 min Winter	98.259	0.259	0.0	1.5	1.5	65.1	O K
120 min Winter	98.320	0.320	0.0	1.5	1.5	80.5	O K
180 min Winter	98.352	0.352	0.0	1.5	1.5	88.5	O K
240 min Winter	98.370	0.370	0.0	1.5	1.5	93.0	O K

Storm Event	Rain (mm/hr)	Flooded Volume (m³)	Discharge Volume (m³)	Time-Peak (mins)
15 min Summer	111.406	0.0	31.8	19
30 min Summer	76.882	0.0	44.4	33
60 min Summer	50.812	0.0	60.4	62
120 min Summer	32.446	0.0	77.3	122
180 min Summer	24.560	0.0	87.8	182
240 min Summer	19.988	0.0	95.3	242
360 min Summer	14.894	0.0	106.6	360
480 min Summer	12.081	0.0	115.3	458
600 min Summer	10.261	0.0	122.4	510
720 min Summer	8.973	0.0	128.4	572
960 min Summer	7.253	0.0	138.2	702
1440 min Summer	5.361	0.0	152.8	980
2160 min Summer	3.951	0.0	171.1	1388
2880 min Summer	3.177	0.0	183.3	1792
4320 min Summer	2.330	0.0	201.3	2548
5760 min Summer	1.871	0.0	216.5	3232
7200 min Summer	1.579	0.0	228.3	3896
8640 min Summer	1.375	0.0	238.3	4576
10080 min Summer	1.223	0.0	246.9	5240
15 min Winter	111.406	0.0	35.8	18
30 min Winter	76.882	0.0	49.8	33
60 min Winter	50.812	0.0	67.7	62
120 min Winter	32.446	0.0	86.6	120
180 min Winter	24.560	0.0	98.4	178
240 min Winter	19.988	0.0	106.8	236

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Summary of Results for 100 year Return Period (+40%)

Storm Event	Max Level (m)	Max Depth (m)	Max Infiltration (l/s)	Max Control (l/s)	Max Σ Outflow (l/s)	Max Volume (m³)	Status
360 min Winter	98.388	0.388	0.0	1.5	1.5	97.8	O K
480 min Winter	98.396	0.396	0.0	1.5	1.5	99.7	O K
600 min Winter	98.397	0.397	0.0	1.5	1.5	99.9	O K
720 min Winter	98.394	0.394	0.0	1.5	1.5	99.2	O K
960 min Winter	98.389	0.389	0.0	1.5	1.5	97.8	O K
1440 min Winter	98.367	0.367	0.0	1.5	1.5	92.3	O K
2160 min Winter	98.324	0.324	0.0	1.5	1.5	81.5	O K
2880 min Winter	98.273	0.273	0.0	1.5	1.5	68.7	O K
4320 min Winter	98.176	0.176	0.0	1.5	1.5	44.3	O K
5760 min Winter	98.112	0.112	0.0	1.5	1.5	28.1	O K
7200 min Winter	98.082	0.082	0.0	1.4	1.4	20.7	O K
8640 min Winter	98.072	0.072	0.0	1.3	1.3	18.1	O K
10080 min Winter	98.064	0.064	0.0	1.1	1.1	16.2	O K

Storm Event	Rain (mm/hr)	Flooded Volume (m³)	Discharge Volume (m³)	Time-Peak (mins)
360 min Winter	14.894	0.0	119.4	350
480 min Winter	12.081	0.0	129.2	460
600 min Winter	10.261	0.0	137.1	564
720 min Winter	8.973	0.0	143.8	650
960 min Winter	7.253	0.0	154.8	742
1440 min Winter	5.361	0.0	170.9	1054
2160 min Winter	3.951	0.0	191.6	1512
2880 min Winter	3.177	0.0	205.4	1960
4320 min Winter	2.330	0.0	225.6	2676
5760 min Winter	1.871	0.0	242.5	3288
7200 min Winter	1.579	0.0	255.7	3816
8640 min Winter	1.375	0.0	267.0	4504
10080 min Winter	1.223	0.0	276.8	5240

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Rainfall Details

Rainfall Model	FSR	Winter Storms	Yes
Return Period (years)	100	Cv (Summer)	0.750
Region	England and Wales	Cv (Winter)	0.840
M5-60 (mm)	18.000	Shortest Storm (mins)	15
Ratio R	0.301	Longest Storm (mins)	10080
Summer Storms	Yes	Climate Change %	+40

Time Area Diagram

Total Area (ha) 0.161

Time From: (mins)	To:	Area (ha)
0	4	0.161

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Model Details

Storage is Online Cover Level (m) 100.000

Cellular Storage Structure

Invert Level (m) 98.000 Safety Factor 2.0
Infiltration Coefficient Base (m/hr) 0.00000 Porosity 0.95
Infiltration Coefficient Side (m/hr) 0.00000

Depth (m)	Area (m²)	Inf. Area (m²)	Depth (m)	Area (m²)	Inf. Area (m²)	Depth (m)	Area (m²)	Inf. Area (m²)
0.000	265.0	0.0	0.400	265.0	0.0	0.401	0.0	0.0

Hydro-Brake® Optimum Outflow Control

Unit Reference	MD-SHE-0066-1500-0400-1500
Design Head (m)	0.400
Design Flow (l/s)	1.5
Flush-Flo™	Calculated
Objective	Minimise upstream storage
Application	Surface
Sump Available	Yes
Diameter (mm)	66
Invert Level (m)	98.000
Minimum Outlet Pipe Diameter (mm)	100
Suggested Manhole Diameter (mm)	1200

Control Points	Head (m)	Flow (l/s)	Control Points	Head (m)	Flow (l/s)
Design Point (Calculated)	0.400	1.5	Kick-Flo®	0.279	1.3
Flush-Flo™	0.118	1.5	Mean Flow over Head Range	-	1.3

The hydrological calculations have been based on the Head/Discharge relationship for the Hydro-Brake® Optimum as specified. Should another type of control device other than a Hydro-Brake Optimum® be utilised then these storage routing calculations will be invalidated

Depth (m)	Flow (l/s)	Depth (m)	Flow (l/s)	Depth (m)	Flow (l/s)	Depth (m)	Flow (l/s)	Depth (m)	Flow (l/s)
0.100	1.5	0.800	2.0	2.000	3.1	4.000	4.3	7.000	5.7
0.200	1.4	1.000	2.3	2.200	3.3	4.500	4.6	7.500	5.9
0.300	1.3	1.200	2.5	2.400	3.4	5.000	4.8	8.000	6.1
0.400	1.5	1.400	2.6	2.600	3.5	5.500	5.0	8.500	6.3
0.500	1.7	1.600	2.8	3.000	3.8	6.000	5.3	9.000	6.5
0.600	1.8	1.800	3.0	3.500	4.0	6.500	5.5	9.500	6.6

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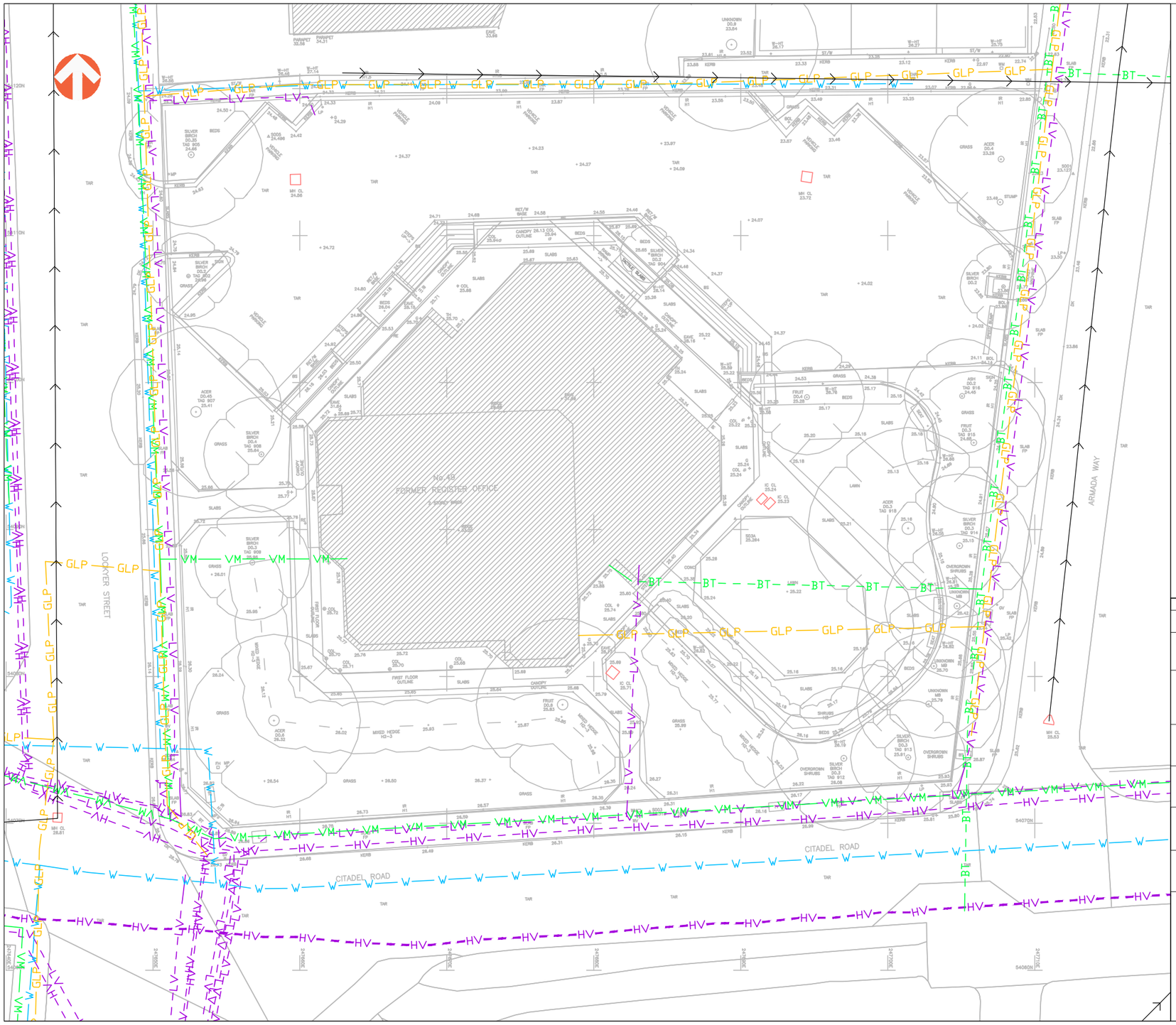


Key

- Combined Sewer
- W — Water Main
- HV — Under Ground High Voltage Cable (11 KV)
- HV — Under Ground High Voltage Cable (33 KV)
- LV — Under Ground Low Voltage Cable
- GLP — Low Pressure Gas
- BT — Under Ground BT
- VM — Under Ground Virgin Media
- Existing private service covers shown in pink

Note: Off-site combined sewer alignments adjusted to suit manhole positions on Topographic survey.

REV	DATE	DESCRIPTION	BY	CHK	APD
A	19.03.2021	INITIAL ISSUE	TMR	IDA	IDA

DRAWING STATUS: FOR INFORMATION ONLY

CLIENT: FORM DESIGN / LOCALITIES

PROJECT: PLYMOUTH REGISTER OFFICE, PLYMOUTH

TITLE: EXISTING COMBINED UTILITIES PLAN

PROJECT No:	DRAWING No:	REV:
1024	01-UD-1001	A

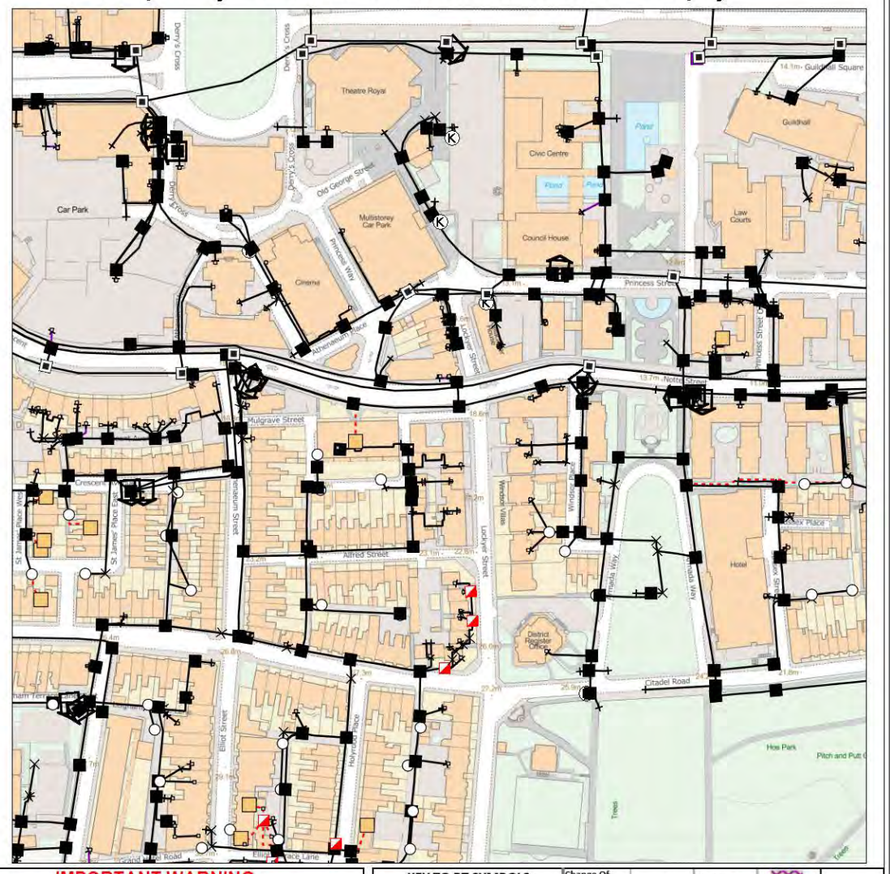
SCALE @ A3: 0 1:250 12.5 metres

DESIGN BY:

awcockward partnership
Awcock Ward Partnership, Kensington Court, Woodwater Park, Pynes Hill, Exeter, EX2 5TY
Tel: 01392 409007 Web: www.awpexeter.com

6.2 AWP
Redevelopment Infrastructure Due Diligence Report

Maps by email Plant Information Reply



IMPORTANT WARNING

Information regarding the location of BT apparatus is given for your assistance and is intended for general guidance only. No guarantee is given of its accuracy. It should not be relied upon in the event of excavations or other works being made near to BT apparatus which may exist at various depths and may deviate from the marked route.

openreach

CLICK BEFORE YOU DIG

FOR PROFESSIONAL FREE ON SITE ASSISTANCE PRIOR TO COMMENCEMENT OF EXCAVATION WORKS INCLUDING LOCATE AND MARKING SERVICE

email cbyd@openreach.co.uk

ADVANCE NOTICE REQUIRED
(Office hours: Monday - Friday 08.00 to 17.00)
www.openreach.co.uk/cbyd

Accidents happen

If you do damage any Openreach equipment please let us know by calling 0800 023 2023 (opt 1 + opt 1) and we can get it fixed ASAP

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KEY TO BT SYMBOLS

	Planned	Live
PCP		
Pole		
Box		
Manhole		
Cabinet		

Change Of State	+	Hatchings	
Split Coupling		Built	
Duct Tee		Planned	
Building		Inferred	
Kiosk	K	Duct	

Other proposed plant is shown using dashed lines. BT Symbols not listed above may be disregarded. Existing BT Plant may not be recorded. information valid at time of preparation. Maps are only valid for 90 days after the date of publication.

	Pending Add	In Place	Pending Remove	Not In Use
Power Cable				
Power Duct				N/A

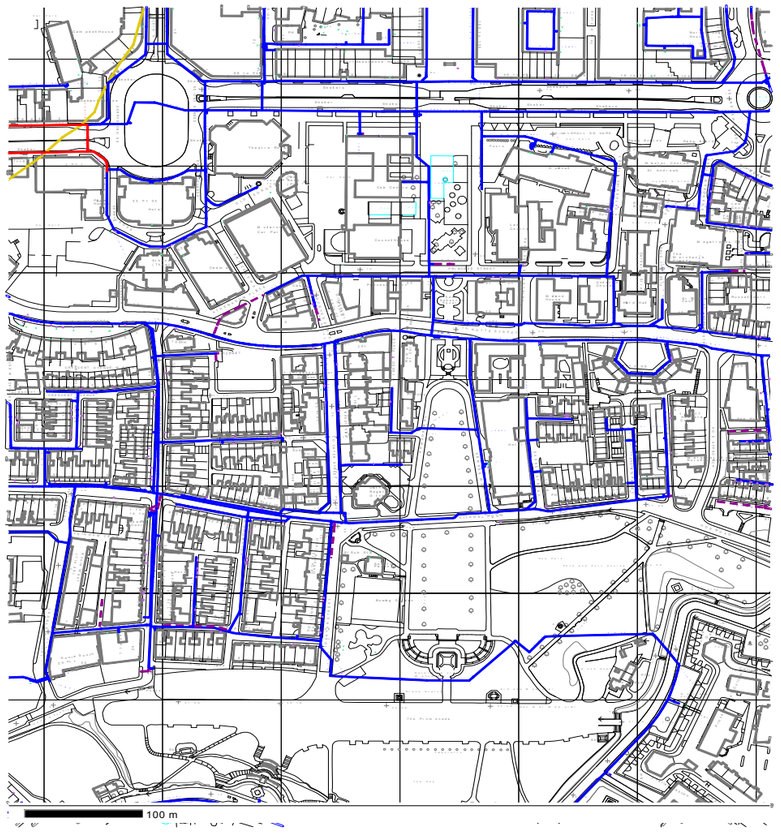
BT Ref : MIW07162E
Map Reference : (centre) SX4761754214
Easting/Northing : (centre) 247617,54214
Issued : 11/02/2021 19:17:08

WARNING: IF PLANNED WORKS FALL INSIDE HATCHED AREA IT IS ESSENTIAL BEFORE PROCEEDING THAT YOU CONTACT THE NATIONAL NOTICE HANDLING CENTRE. PLEASE SEND E-MAIL TO: nnhc@openreach.co.uk

SOUTH WEST WATER

The information indicated on this plan is provided only as a guide and no assurance as to its accuracy is given or implied. The Company accepts no liability whatsoever for any error or omission in the information. It should be noted that not all mains, service pipes and other apparatus of the Company in the area of the plan are shown.

WATER | **SITE OFF NOTTE STREET, PLYMOUTH PL49BD**



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Water Pipe Details

Distribution	
Trunk	
Communication	
Untreated	
Private	
Abandoned	

Common Materials

Cast Iron	CI	High Density Polyethylene	HDPE
Spun Iron	SI		
Ductile Iron	DI	Medium Density Polyethylene	MDPE
Steel	ST		
Asbestos Cement	AC	High Pressure Polyethylene	HPPE
Plastic	UPVC		

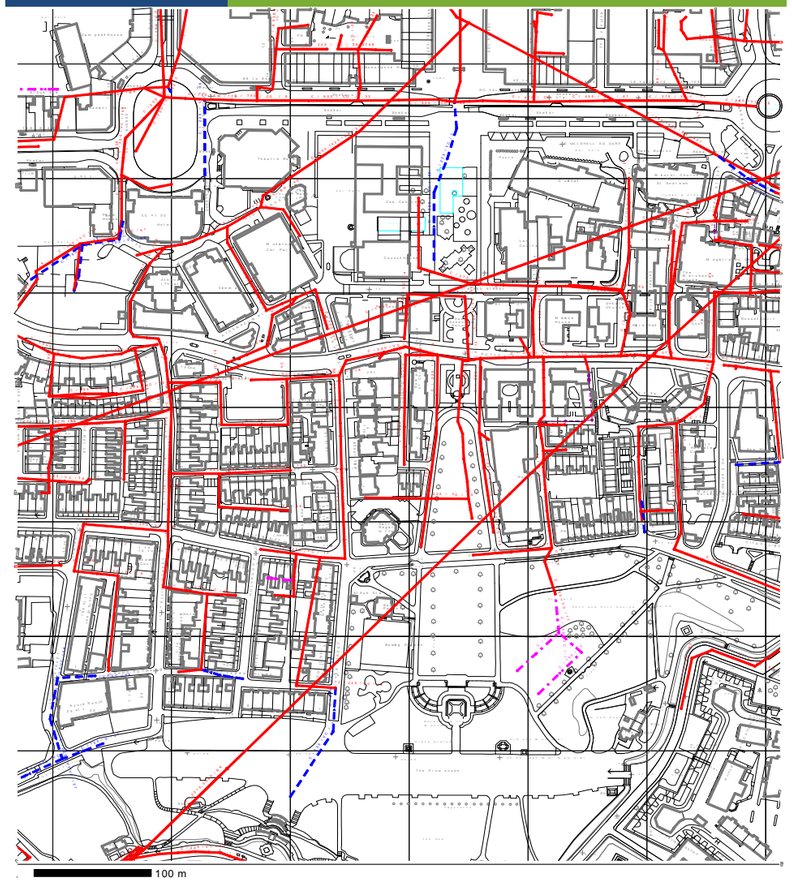
Water Features

Washout, Hydrant, Air Valve (Single), Air Valve (Double), Stop Tap, Hatchbox, Pump, Stuice Valve Open (AC), Stuice Valve Closed, Stuice Valve (CC), Stop Tap, Customer Meter, Mains Meter, Relief Valve, Pressure Reducing Valve, Pressure Sustaining Valve, Non Return Valve / Reflux, Relief Valve

SOUTH WEST WATER

The information indicated on this plan is provided only as a guide and no assurance as to its accuracy is given or implied. The Company accepts no liability whatsoever for any error or omission in the information. It should be noted that not all mains, service pipes and other apparatus of the Company in the area of the plan are shown.

DRAINAGE | **SITE OFF NOTTE STREET, PLYMOUTH PL49BD**



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Sewer Pipe Details

Public - Foul	
Public - Surface	
Public - Combined	
Public - Treated	
Pumping Main	
Elevated	
Unverified	
Abandoned	
Highway	

Common Shapes

Circular	C	Barrel	B	U Shaped	US
Rectangular	R	Trapezoidal	T	Horseshoe	H
Unknown	U	Egg Shape	E	Oval	OV

Common Materials

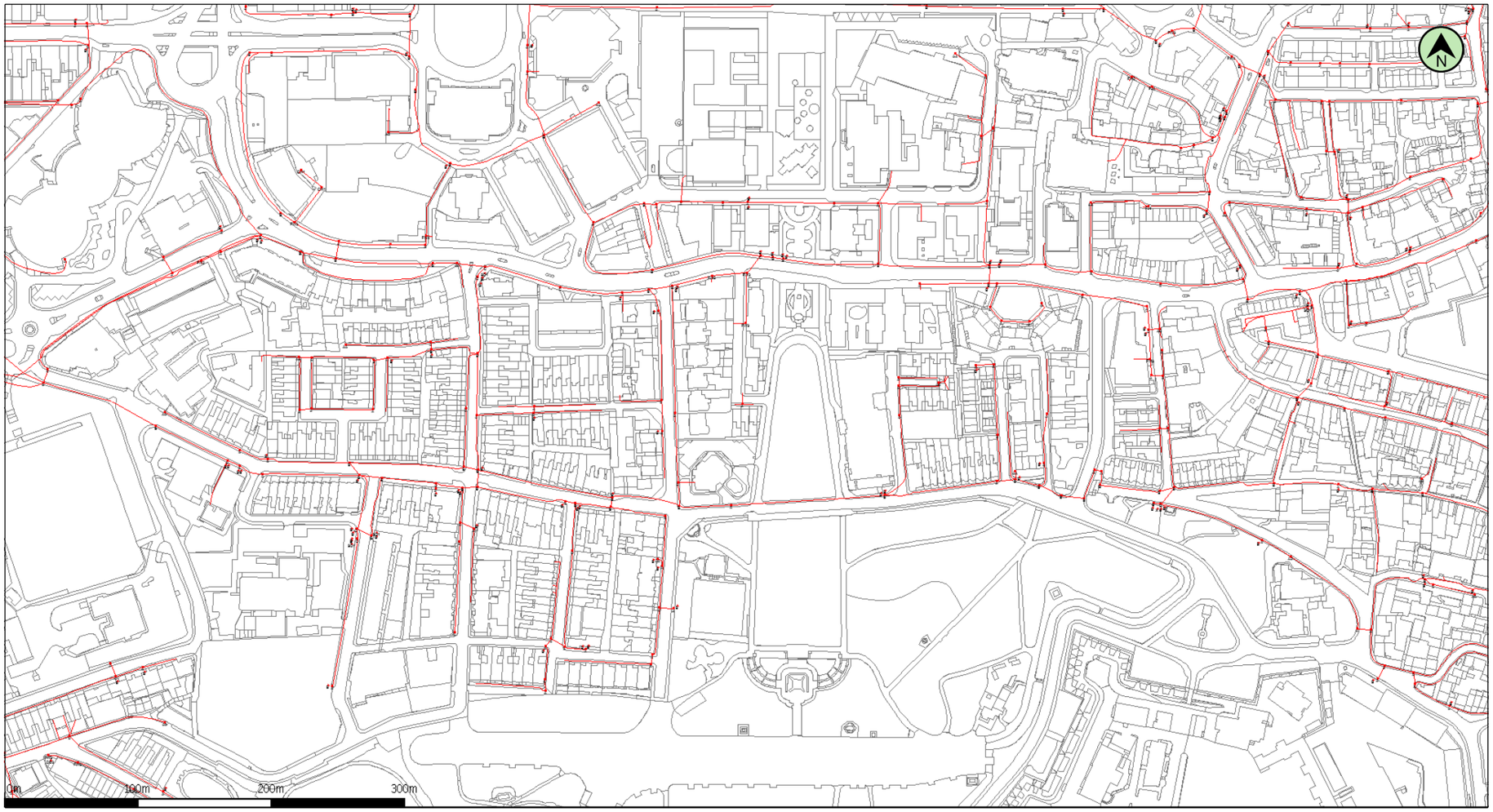
Vitrified Clay	VC	Alkathene	AK	Medium Density Polyvinylchloride	MDPE
Pre Cast Concrete	PCO	Asbestos Cement	AC	Unplasticised Polyvinylchloride	UPVC
Concrete	CO	Polyvinylchloride	PVC	Unknown	U

Sewerage Structures

Manhole Foul		Manhole Surface	
Manhole Combined		Manhole Private	
Soakaway	SK	Catchpit	CP
Washout	WO	Hatchbox	HB
Buried	BU	Unable to Locate	UL

6.2 AWP

Redevelopment Infrastructure Due Diligence Report



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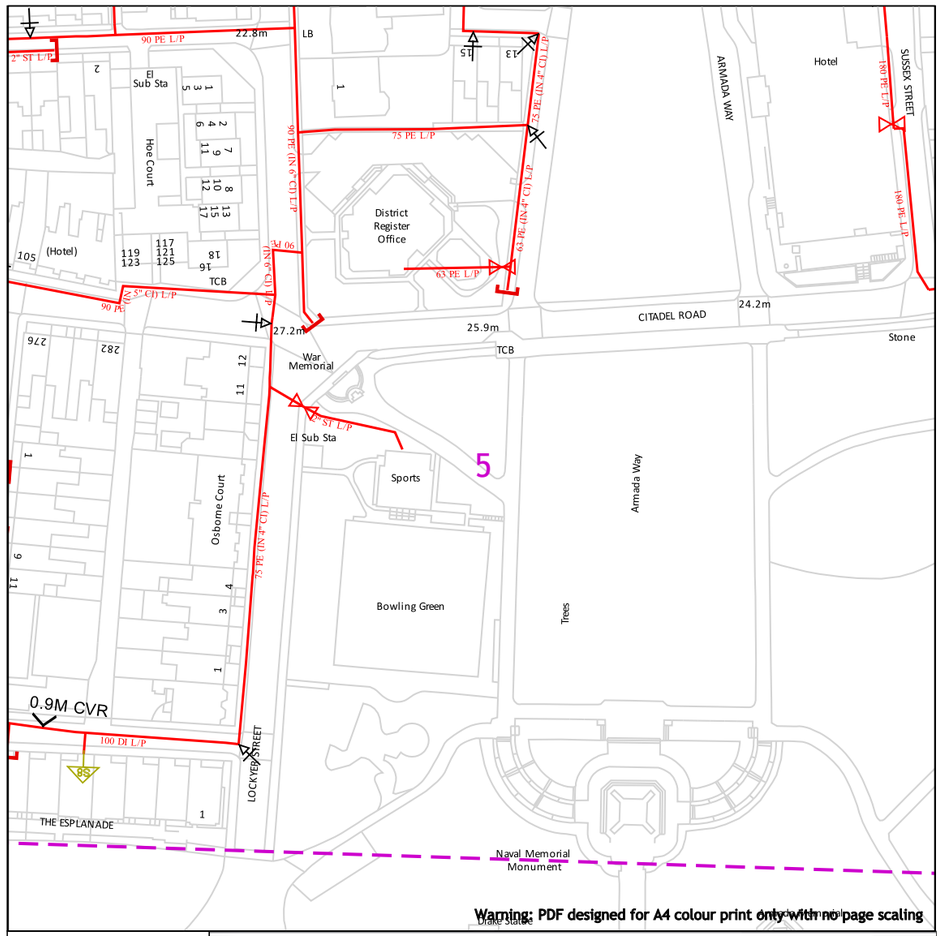
Important Information - please read The purpose of this plan is to identify Virgin Media apparatus. We have tried to make it as accurate as possible but we cannot warrant its accuracy. In addition, we caution that within Virgin Media apparatus there may be instances where mains voltage power cables have been placed inside green, rather than black ducting. Further details can be found using the "Affected Postcodes.pdf", which can be downloaded from this website. Therefore, you must not rely solely on this plan if you are carrying out any excavation or other works in the vicinity of Virgin Media apparatus. The actual position of any underground service must be verified by cable detection equipment, etc. and established on site before any mechanical plant is used. Accordingly, unless it is due to the negligence of Virgin Media, its employees or agents, Virgin Media will not have any liability for any omissions or inaccuracies in the plan or for any loss or damage caused or arising from the use of and/or any reliance on this plan. This plan is produced by Virgin Media Limited (c) Crown copyright and database rights 2020 Ordnance Survey 100019209.

Duct, Trench | Chamber | Cabinet

chilakala.apsar@virginmedia.co.uk

VM.1185540





WALES&WEST UTILITIES

Contact Us
Mapping Enquiries:
All areas 02920 278 912
General Enquiries:
All areas 0800 912 2999

100m

Dig Sites Area: Line:

- Low Pressure (LP) 21mbar – 75mbar
- Medium Pressure (MP) 350mbar – 2bar
- Intermediate Pressure (IP) 2bar – 7bar
- High Pressure (HP) >7bar
- Change of Diameter
- End Cap
- Depth of cover
- Line/Fire Valve
- Governor Station

Date Requested: 11/02/2021
Job Reference: 21269387
Site Location: 247707 054134
Requested by: Ms Christina Elliott

Your Scheme/Reference: 92897/SSM

Scale: 1:1250 (When plotted at A4)

IMPORTANT NOTICES

- This information is given as a guide only and its accuracy cannot be guaranteed
- The plan only shows those pipes owned by Wales & West Utilities (WWU) as its role as a licensed Gas Transporter
- Service pipes, valves, syphons, stub connections etc. may not be shown but their presence should be anticipated
- You must use safe digging practices in accordance with HS(G)47 to establish the actual position of mains, services and other apparatus before any mechanical excavation is used
- It is your responsibility to ensure this information is provided to all persons working near our plant
- If in doubt call the WWU dig team on 02920 27891

Report damage immediately – KEEP EVERYONE AWAY FROM THE AREA
0800 111 999

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Smell gas? Call the Gas Emergency Service on 0800 111 999.
Dial before you dig
Dial Call 029 2027 8912 before you start work.
Investigate Before you dig, make sure you know what's below.
Go ahead Done your research? Now you can dig safely.
We need 10 days' notice

WESTERN POWER DISTRIBUTION
Serving the Midlands, South West and Wales

Contact Us
Mapping Enquiries:
All areas 0121 623 9780
General Enquiries:
All areas 0800 096 3080

Date Requested: 11/02/2021
Job Reference: 21269387
Site Location: 247696 54153
Requested by:
Ms Christina Elliott
Your Scheme/Reference:
92897/SSM

Exact Scales:
1:1250 Area or Circle dig site
1:500 Line dig site

Link Box
Site Location
Line/Area

Overhead Line: PL, Service, LV, HV (11kV), HV (33kV), HV (66kV), HV (132kV)

Underground Cable

SURF Telecoms: PME Earth, Underground Earth

Pilot Cables: Pole Mounted Transformer, Ground Mounted Transformer

IMPORTANT NOTICES

- This information is given as a guide only and its accuracy cannot be guaranteed. Services or recent additions to the network may not be shown.
- Cables, overhead lines & substations owned by other electricity network owners or private companies may be present and may not be shown.
- You should always verify exact locations of cables using a cable locator and by careful use of hand tools in accordance with HSE guidance note HSG47.
- When working within 10m of any overhead electric line you should follow the requirements of HSE Guidance Note GS6.
- For further advice on working near our electricity cables or lines, call our General Enquiries number.
- Advice should be sought from the Western Power Distribution General Enquiries team for any work that is to take place in proximity to 132kV underground cables and 132kV overhead lines.

Report damage immediately – KEEP EVERYONE AWAY FROM THE AREA
0800 6783 105

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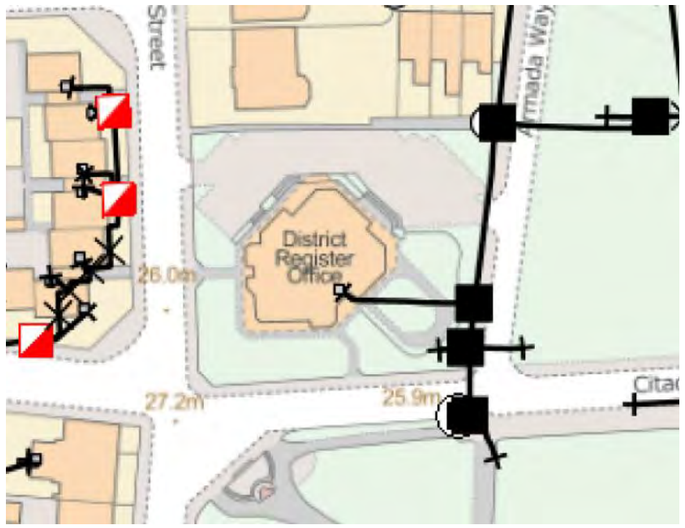
6.2 AWP
Affected Utilities Summary

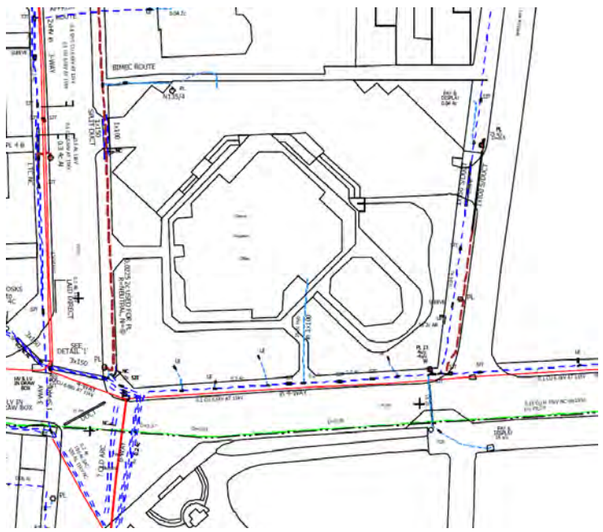
1024 Plymouth Register Office

Summary Utility Enquiries

BT Openreach



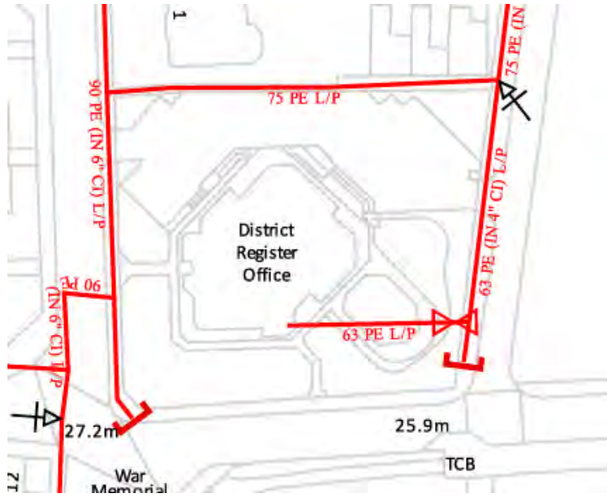
WPD Electric



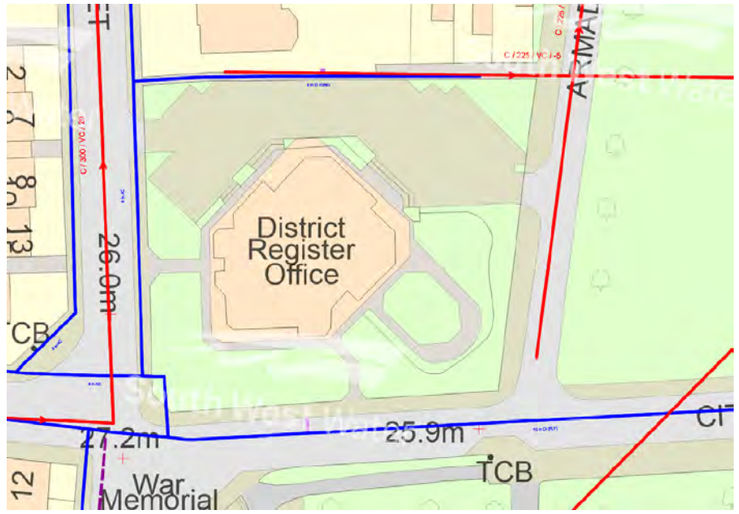
Virgin Media Telecoms



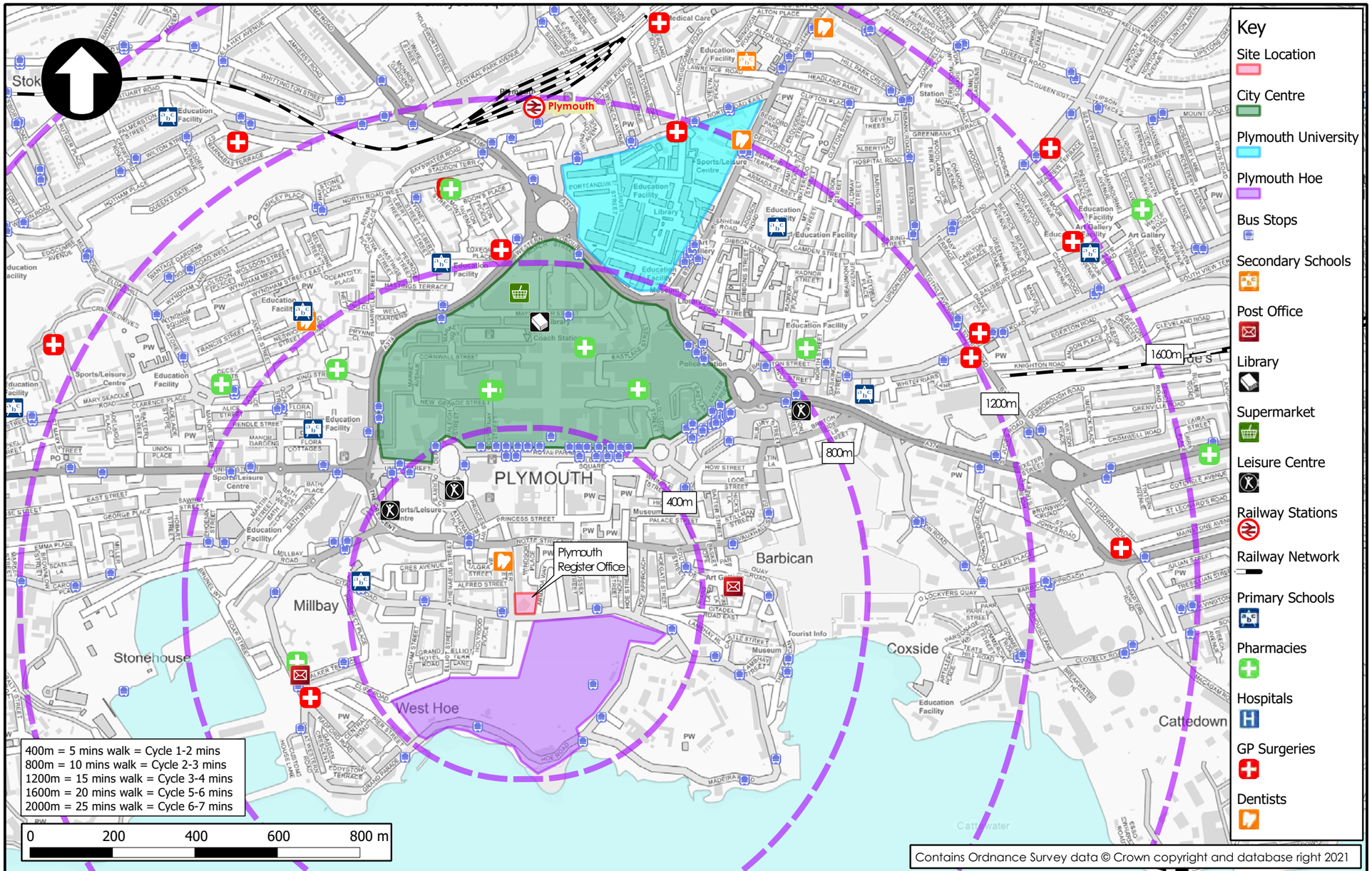
Wales + West – Gas



SWW – Water + Sewers



6.2 AWP
Site Accessibility Plan



awcockward partnership

Plymouth Register Office
Site Accessibility Plan

Job number:	1024
Drawn:	MR
Checked:	SD
Approved:	IDA

Figure 4.1

6.3 PCC Pre-App
LLFA Response

OFFICIAL:SENSITIVE

Plymouth Lead Local Flood Authority (LLFA)

CONSULTATION RESPONSE

Document / Report Title:	Plymouth Registry Office
Document / Report Ref	EDG20/002/FRSR-147
PCC Planning Ref(s)	**20/01766/CONF**

Issue Status/Amendment	Prepared	Reviewed	Approved
Issue 0	Name: DS Miles Signature: Date: 17/12/20	Name: A. Cottam Signature: Date: 17/12/20	Name: A. Cottam Signature: Date: 17/12/20

Site Location	Plymouth Register Office 49 Lockyer Street Plymouth PL1 2QD
Proposed development	Pre-application for the development of a 44-bed residential building with car parking for 44 cars.
Site Summary	The 2,665m^2 site is located in Flood Zone 1, and at a low risk of fluvial or tidal flooding. Surface water flood risk mapping provided by the Environment Agency indicates a low risk of flooding to the site itself from a 1% AEP (1 in 100 year return period) flood event. The site is located in a Critical Drainage Area (green) where the Environment Agency considers the drainage network is at or close to capacity. Public sewer records indicate that there are no surface water sewers in the vicinity of the site. A 225mm diameter SWW combined sewer is indicated to the west of the site in Lockyer Street, and a 225mm diameter SWW combined sewer is indicated along the north boundary of the site that connects to a 225mm diameter SWW combined sewer to the east of the site in Armada Way.
Submitted Information	A flood risk assessment or drainage strategy has not been submitted at this time.
Technical Response	The proposed development is located in a Critical Drainage Area and is required to submit a Flood Risk Assessment and surface water drainage

Strategic Planning and Infrastructure
PLYMOUTH.GOV.UK/FLOODING

OFFICIAL:SENSITIVE

Plymouth Lead Local Flood Authority (LLFA)

CONSULTATION RESPONSE

	strategy in accordance with the Plymouth Local Flood Risk Management Plan. Surface water from the proposed development should be discharged in a separate surface water drainage system which should be discharged according to the following hierarchy: • Discharge to a waterbody (if available and with sufficient capacity). • Infiltration • Discharge to a surface water sewer, highway drain or culverted watercourse with attenuation as required. A surface water drainage strategy or flood risk assessment should be submitted that demonstrates that the proposed drainage system, including any attenuation, can provide a 1% AEP standard of protection plus a 40% allowance for climate change. Calculations and modelling results should be produced in support of any drainage design, including infiltration test results to support the chosen drainage strategy. Details are required of all proposed drainage features identified on a plan prior to planning approval. The Plymouth Local Flood Risk Management Strategy requires that any infiltration tests should be completed in accordance with BRE365, located where the proposed soakaway devices are to be situated and below any made ground. It's recommended that the test sites are shown clearly on a plan. It is recommended by BRE365 to not include infiltration through the base of any infiltration device in the design of a surface water drainage system. BRE365 recommends that infiltration devices are located further than 5m from property and public highway and are not located in ground sloping greater than 10%. For infiltration drainage systems, a ground investigation study including an assessment of the underlying geology should be undertaken to assess and confirm the anticipated path the water will take having been discharged to the proposed soakaway. This is to confirm that water will not follow a pathway that ultimately impacts upon third party land or property. SWW should be consulted for any surface water drainage strategy that proposes to connect to the existing SWW sewerage system and written confirmation of approval from SWW should be submitted, including agreed surface water discharge rates before the drainage proposals are accepted. This will be limited to 1 in 10 year greenfield run off rates, with on-site attenuation required to store surface water volumes over and above these rates to a 1 in 100 year return period standard of protection with a 40% allowance for climate change. In an extreme event that exceeds the design standard, a surface water exceedance flow route should be identified on a plan that shows the route exceedance flows will take both on and off site from the point of surcharge, and demonstrating that these flows do not increase the risk of flooding to properties on and off the site and or to Third Party Land including the Public Highway. Exceedance flows should be intercepted and contained on site as

Strategic Planning and Infrastructure
PLYMOUTH.GOV.UK/FLOODING

6.3 PCC Pre-App
LLFA Response

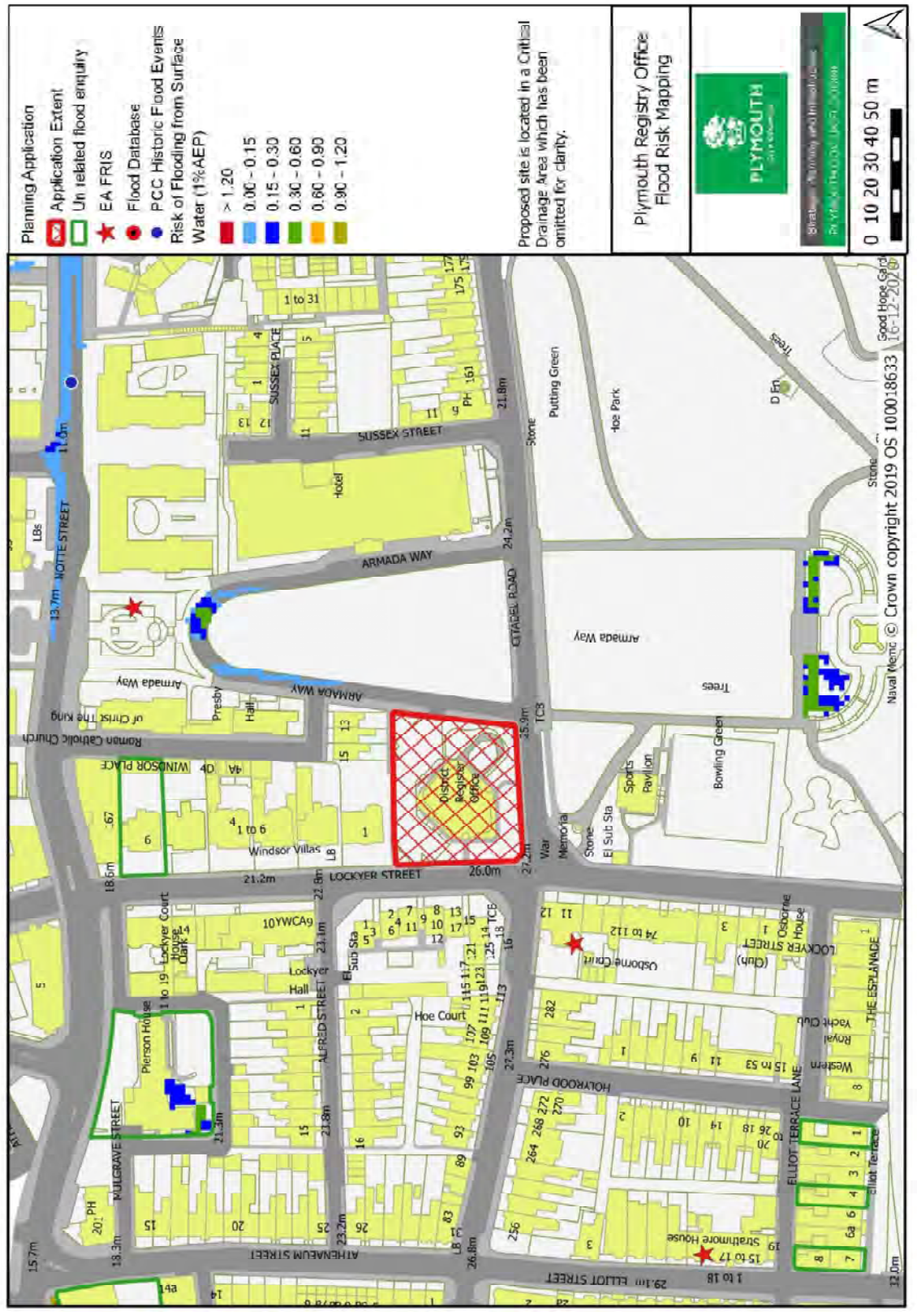
OFFICIAL:SENSITIVE

Plymouth Lead Local Flood Authority (LLFA)

CONSULTATION RESPONSE

	far as this is reasonably practicable and safe to do so, ensuring that flows are directed away from public access areas. Details should be submitted of how and when the system is to be managed and maintained, and any future adoption proposals should be submitted. A construction environment management plan incorporating method statements should be submitted to demonstrate how the water environment and new drainage system is protected during the alteration and construction phases.

Strategic Planning and Infrastructure
PLYMOUTH.GOV.UK/FLOODING



OFFICIAL:SENSITIVE

Plymouth Lead Local Flood Authority (LLFA)

CONSULTATION RESPONSE

Response Summary

Support	
No Objection	
No Objection subject to submission of additional information	✓
Object to application	

No Objection subject to the submission of the following information

The following information should be submitted to support this planning application as required by the Plymouth Local Flood Risk Management Strategy.

a) The proposed development is located in a Critical Drainage Area and is required to submit a Flood Risk Assessment and surface water drainage strategy in accordance with the Plymouth Local Flood Risk Management Plan.

b) Surface water from the proposed development should be discharged in a separate surface water drainage system which should be discharged according to the following hierarchy:

- Discharge to a waterbody (if available and with sufficient capacity).
- Infiltration
- Discharge to a surface water sewer, highway drain or culverted watercourse with attenuation as required.

A surface water drainage strategy or flood risk assessment should be submitted that demonstrates that the proposed drainage system, including any attenuation, can provide a 1% AEP standard of protection plus a 40% allowance for climate change.

Calculations and modelling results should be produced in support of any drainage design, including infiltration test results to support the chosen drainage strategy. Details are required of all proposed drainage features identified on a plan prior to planning approval.

c) The Plymouth Local Flood Risk Management Strategy requires that infiltration tests should be completed in accordance with BRE365, located where the proposed soakaway devices are to be situated and below any made ground. It's recommended that the test sites are shown clearly on a plan.

It is recommended by BRE365 to not include infiltration through the base of any infiltration device in the design of a surface water drainage system. BRE365 recommends that infiltration devices are located further than 5m from property and public highway and are not located in ground sloping greater than 10%.

For infiltration drainage systems, a ground investigation study including an assessment of the underlying geology should be undertaken to assess and confirm the anticipated path the water will take having been discharged to the proposed soakaway. This is to confirm that water will not follow a pathway that ultimately impacts upon third party land or property.

d) SWW should be consulted for any surface water drainage strategy that proposes to connect to the existing SWW sewerage system and written confirmation of approval from SWW should be submitted, including agreed surface water discharge rates before the drainage proposals are accepted. This will be limited to 1 in 10 year greenfield run off rates, with on-site attenuation required to store surface water

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Plymouth Lead Local Flood Authority (LLFA)

CONSULTATION RESPONSE

volumes over and above these rates to a 1 in 100 year return period standard of protection with a 40% allowance for climate change.

e) In an extreme event that exceeds the design standard, a surface water exceedance flow route should be identified on a plan that shows the route exceedance flows will take both on and off site from the point of surcharge, and demonstrating that these flows do not increase the risk of flooding to properties on and off the site and or to Third Party Land including the Public Highway. Exceedance flows should be intercepted and contained on site as far as this is reasonably practicable and safe to do so, ensuring that flows are directed away from public access areas.

f) Details should be submitted of how and when the system is to be managed and maintained, and any future adoption proposals should be submitted.

g) A construction environment management plan incorporating method statements should be submitted to demonstrate how the water environment and new drainage system is protected during the construction phase.

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6.3 PCC Pre-App LLFA Response

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Plymouth Lead Local Flood Authority (LLFA)

CONSULTATION RESPONSE

Flood Risk Strategy
Plymouth City Council's Local Flood Risk Management Strategy for this area aims to improve capacity of combined sewerage systems and reduce the risk of flooding from surface water run off. Any opportunity to achieve these aims as part of these works should be explored, also to protect against increases in flood risk due to future climate change.

Surface water from the proposed development should be discharged in a surface water drainage system which should be discharged according to the following hierarchy:

- Discharge to a waterbody (if available and with sufficient capacity).
- Infiltration
- Discharge to a surface water sewer, highway drain or culverted watercourse with attenuation as required.

Evidence, including infiltration tests, should be provided that demonstrates that these options have been assessed and appraised.

The Plymouth Local Flood Risk Management Strategy Part 1 (April 2017) contains a strategic level overview of the management of flood risk in Plymouth. Technical guidance for flood risk and drainage has been issued in the Plymouth City Council report Local Flood Risk Management Strategy Part 2 - A Technical Design Guide (April 2017).

The Local Flood Risk Management Strategy (LFRMS) can be accessed at plymouth.gov.uk/emergencies/severeweather/flooding

The site is located across the Millbay & City Centre and the Sutton & Laira Flood Risk Management Strategy areas.

Millbay and City	
Key Issues	Surface water flood risk around Union St and the Octagon, very low ground levels ~ 2m AOD. Some tidal flood risk around Millbay development areas. Possibilities to raise ground levels. Future tidal flood risk is an issue. Reduced capacity within surface water and combined sewerage systems.
Objectives	Reduce extent and frequency of surface water flooding. Increase sewerage capacity. Development opportunities for using storage and SuDS. Identify key developments to address flood risk holistically
Strategy	**Improve capacity within combined sewerage and highway drainage systems. Manage interactions between sewerage and surface water systems and tidal influences. Minimise risk from future predicted tidal flooding.**
Delivery	Western Approach and King Street IUDM Strategic Surface Water Drainage Corridors designated for City Centre. Regulation of surface water drainage for future developments through planning consultation with LLFA. Teats Hill slipway refurbishment

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Plymouth Lead Local Flood Authority (LLFA)

CONSULTATION RESPONSE

Sutton and Laira	
Key Issues	Significant pollution incidents into the River Plym impact on Bathing Water Quality. This catchment has both Designated bathing beaches. Risk of tidal flooding to properties in Sutton Harbour and areas along the River Plym. Heavily urbanised area with frequent flooding due to surcharged sewerage networks. Areas at risk of surface water flooding.
Objectives	Improve bathing water quality to meet new testing criteria at East and West Hoe beaches. Reduce tidal influence on surface water drainage. Reduce CSO spills and misconnections Reduce impact of siltation on operation of sewers and highway drainage.
Strategy	**Increase capacity of highway drainage and combined sewerage systems through surface water separation, capacity improvements and management of saline infiltration. Aim to provide 0.5% AEP (2110) standard of defence against tidal flooding.**
Delivery	Lanhydrock Road pumping station (Mount Gould IUDM) Stenlake Terrace IUDM Strategic Surface Water Drainage Corridors designated for North Hill. Arnold's Point Phase 2 flood defence wall West Pier Barbican re-pointing and reconstruction Phoenix Wharf renovation Regulation of surface water drainage for future developments through planning consultation with LLFA. Regulation of tidal defences for future developments through planning consultation with LLFA.

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Plymouth Lead Local Flood Authority (LLFA)

CONSULTATION RESPONSE

Resources and References

This document contains flood risk data as requested for a specific site. The data is intended to inform and advise interested parties about the risk of flooding at the site, including local flood risk management strategies and key flooding issues and objectives. The data has been derived from the following sources:

Data	Source
Key flooding issues, objectives and management strategy to reduce the risk of flooding	Plymouth City Council Local Flood Risk Management Strategy (Draft) (2013)
Potential flood sources	Plymouth City Council Local Flood Risk Management Strategy (Draft) (2013) Environment Agency flood risk mapping (flood zones 2 and 3, and updated flood maps for surface water)
Existing flood defences	Plymouth City Council ordinary watercourse asset register Environment Agency flood defence asset register (NFCDD)
Existing flood risk studies	Various
Flooding History	Plymouth City Council historic flood records (up to October 2011) Plymouth City Council flood database (October 2011 to present) Plymouth Flood Investigation Reports
Ordinary watercourse assets	Plymouth City Council ordinary watercourse asset register
Locations of ordinary watercourses	Plymouth City Council ordinary watercourse asset register

Strategic Planning and Infrastructure
PLYMOUTH.GOV.UK/FLOODING

6.4 Hoe Neighbourhood Forum
Consultation Leaflet/Report

Plymouth **Register Office** Consultation

The Hoe Neighbourhood Forum is seeking your help as local residents and organisations to guide the development brief for the Plymouth Register Office site.

It is your chance to express your views and assist the Forum to engage with Plymouth City Council and achieve a feasible outcome that reflects the aspirations of the community within our Neighbourhood Plan.
Residential or hospitality uses are currently envisaged within Policy PLY27 the Plymouth Joint Local Plan (JLP) and is being marketed for delivery in 2023-2024.

JLP Policy PLY27 Register Office

The joint local plan policy for the site states the following:

Land at Lockyer Street, The Hoe, is allocated for mixed use development, including a quality hotel and housing. Provision is made for in the order of 52 homes. Development should provide for the following:

1. High quality architecture that maximises the site's redevelopment potential whilst responding positively to the Hoe Conservation Area's historic character and the site's role as a strategic gateway to Armada Way. The design should be informed by a detailed character assessment to be undertaken for the proposal.

2. Active ground floor frontages to be encouraged to enliven all public streets and spaces – Armada Way and Citadel Road in particular.

3. Improved east/west public access along the site's northern boundary, linking Armada Way to Lockyer Street.

4. High quality public realm including enhancement of Armada Way.

5. Innovative car parking solutions to reduce the visual impact of vehicles on the public realm.

6. Relocation of the register office function.





The Forum has secured government funding to undertake a study to establish the key issues that are of concern to residents. You are invited to share your views openly with the Forum and some of the questions you might wish to consider, among others, could include the following:

- Would you like to see the site developed primarily for hospitality or residential uses or both?
- The site is located in a strategic position within the Hoe Conservation Area and a landmark building is envisaged. What architectural statement to mark the important junction between Citadel Road and Armada Way do you consider appropriate?
- What community, leisure or congregational uses would you like to see incorporated and should a wedding venue be retained?
- What type of homes would you like to see incorporated into the development that would help sustain the community in the longer term?
- If hospitality, leisure or tourism uses can be attracted to the site, how do you think the amenity value of the adjacent area of Armada Way might be improved?
- How important do you think retaining the trees are to this site and what other 'green' solutions do you think might be appropriate?
- How important do you consider car parking to be or should this development be completely car free?













Please respond by 31st August 2020 with your ideas and any other points you consider relevant by email to: **plan@hoeforum.org.uk**
For further information visit our **facebook page** or website **www.hoeforum.org.uk**

6.4 Hoe Neighbourhood Forum
Proposed NDO Presentation

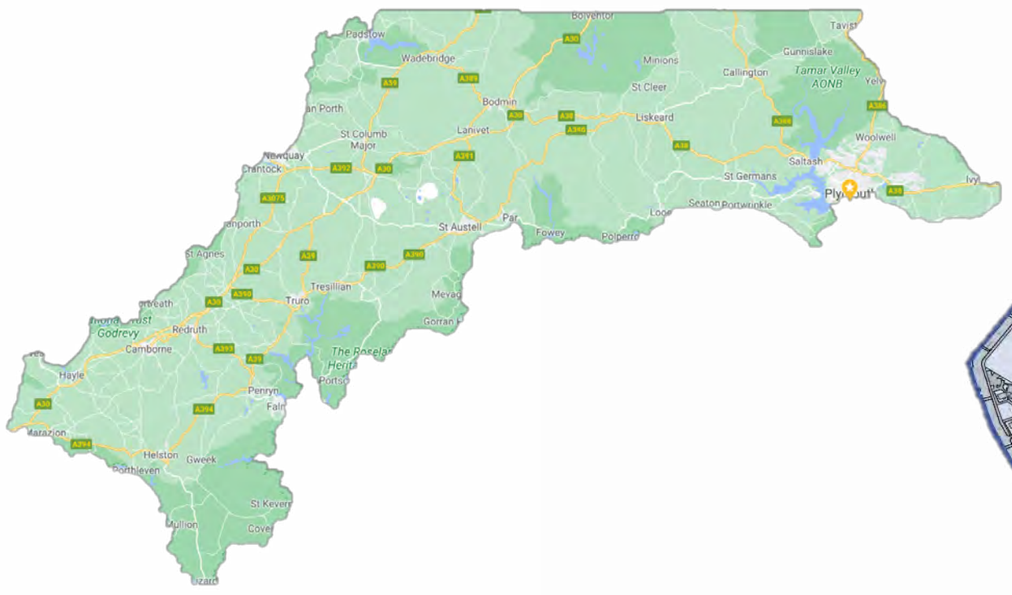
HOE
NEIGHBOURHOOD
FORUM

Overview of our proposed Neighbourhood Development Order



6.4 Hoe Neighbourhood Forum
Proposed NDO Presentation

- The Hoe is an 'urban village' within the city of Plymouth in Devon
- Super-complex neighbourhood forum with highly sought-after Georgian and Victoria streets, plus areas of deprivation.
- National war memorial, Grade 1 Ancient monument, military base, Registered Park, Beautiful waterfront



HOE
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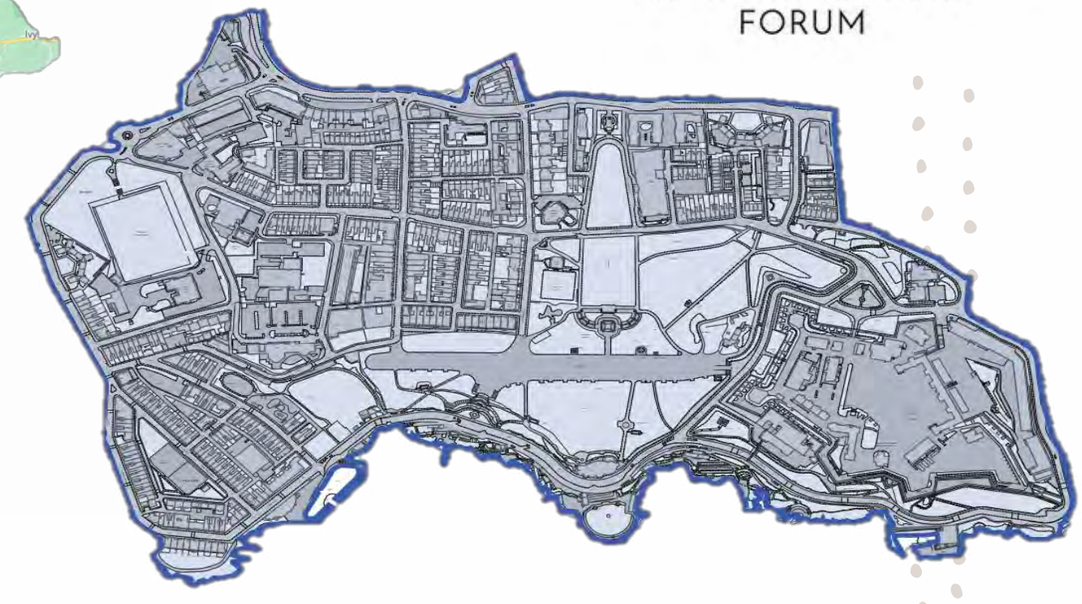
FORUM



Why prepare an NDO?

- Register Office function moved and building on key site redundant.
- Council likely to sell on open market for highest possible land value
- Lack of affordable housing
- Unhappy with development policy in Local Plan – overdevelopment within Conservation Area
- Opportunity arose for alternative community-led vision
- Neighbourhood Forum a credible organisation
- Chance to work with council for more sympathetic scheme
- Support of Locality and access to feasibility grant

HOE
NEIGHBOURHOOD
FORUM



6.4 Hoe Neighbourhood Forum
Proposed NDO Presentation

Local community engagement



Plymouth Register Office Consultation

HOE NEIGHBOURHOOD FORUM

The Hoe Neighbourhood Forum is seeking your help as local residents and organisations to guide the development brief for the Plymouth Register Office site

It is your chance to express your views and assist the Forum to engage with Plymouth City Council and achieve a feasible outcome that reflects the aspirations of the community within our Neighbourhood Plan. Residential or hospitality uses are currently envisaged within Policy PLY27 of the Plymouth Joint Local Plan (JLP) and is being marketed for delivery in 2023-2024.

JLP Policy PLY27 Register Office

The joint local plan policy for the site states the following:

Land at Lockyer Street, The Hoe, is allocated for mixed use development, including a quality hotel and housing. Provision is made for in the order of 52 homes. Development should provide for the following:

1. High quality architecture that maximises the site's redevelopment potential whilst responding positively to the Hoe Conservation Area's historic character and the site's role as a strategic gateway to Armada Way. The design should be informed by a detailed character assessment to be undertaken for the proposal.

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5. Innovative car parking solutions to reduce the visual impact of vehicles on the public realm.

6. Relocation of the register office function.

HOE NEIGHBOURHOOD FORUM

- Leaflet to all 1700 households
- Collated written responses
- Regular monthly updates
- Social media and email
- Polls and surveys to come
- Covid restrictions make it difficult

The role of the Local Authority

- Providing our Neighbourhood Forum with the chance to look at a development site in a fresh way

- Plymouth City Council will benefit from the output we will produce as a result of the NDO Feasibility study – e.g. Housing Needs Assessment, C.A Management plan

- Demonstrate commitment to city's co-operative working and ethos of social enterprise

- Potential to demonstrate support for local participative democracy and empowerment

- Different route to fund affordable housing provision

HOE
NEIGHBOURHOOD
FORUM

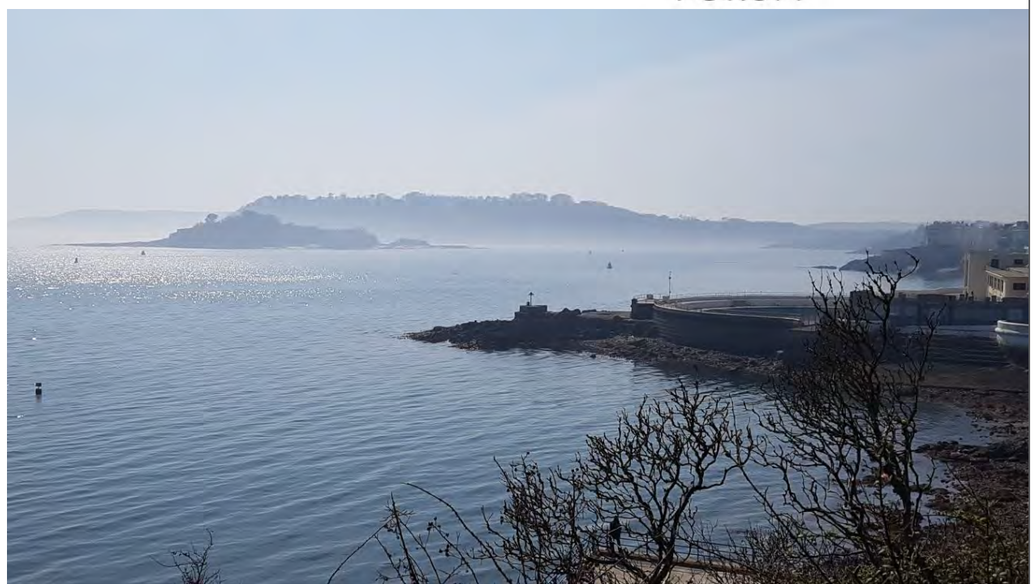


6.4 Hoe Neighbourhood Forum
Proposed NDO Presentation

Biggest challenges and learning points in preparing the NDO

- Sheer complexity
- Highly technical
- Multiple stakeholders with different views
- Keep sense checking
- Bring everyone with you on the journey
- People are pleased to be asked their opinion
- People care about their local community
- It's not for everyone but it is possible to engage a core group, who will upskill, share their expertise and passion and help build a greater sense of community

HOE
NEIGHBOURHOOD FORUM



Tips for other groups looking into bringing an NDO forward

- Gain detailed understanding of the whole community – easy to focus on like-minded birds of a feather
- Be brave, patient and open-minded
- Build strong relationships with local authority and other stakeholders (BIDS, landowners)
- Ask for help, seek mentors
- Don’t be afraid to ask stupid questions - you’re not an expert
- Gain an understanding of the politics
- Thank people for their input - you only have their goodwill and enthusiasm
- Be prepared to spend a lot of your waking hours on it
- Take constructive criticism on the chin and listen
- Work with Locality to look at grant funding possibilities

HOE
NEIGHBOURHOOD FORUM



6.5 Initial Council Planning Advice

From: **Stainwright, Marie** Marie.Stainwright@plymouth.gov.uk
Subject: 20/01766/CONF - Plymouth Register Office
Date: 8 February 2021 at 6:52 pm
To: Graham Lobb graham.lobb@form-design.co.uk

MS

OFFICIAL:SENSITIVE

Dear Graham

I have now had the opportunity to review your scheme including seeking the views of internal consultees.

Please find below my response to your specific queries in relation to the Register Office as reference above. These queries are as agreed with Katherine Graham and are:

1 One meeting and one piece of written advice, seeking a principle view and clarity on relevant policies.
2 Capturing constraints/LPA asks which would require the following internal consultations:
- Highways
- Natural Infrastructure Team
- Lead Local Flood Authority
- Housing
- Low Carbon
- Heritage
- S106

3 Confirmation of validation requirements.

Before going into the detail, the following is in response to the bespoke pre-app/scoping meeting and information submitted. My fundamental recommendation to you is that once you have considered this initial feedback, that should your client wish to develop the scheme further, that you consider entering into a full pre-application process. We would want to work positively and proactively with you through this process to help deliver regeneration of this key site in line with the adopted Joint Local Plan and Policy PLY27.

Constraints
In terms of the site, the key constraints relevant are:
The Hoe Conservation Area
Classified Road – Lockyer Street
Classified Road – Citadel Road
Article 4 Direction – In relation to houses of multiple occupation
HSE – Web based consultation zone

Whilst there are no formal tree preservation orders, the trees are protected as they are located in the conservation area. The site is also located within the Hoe Neighbourhood Forum Boundary.

Principle view
In relation to the first point of your enquiry, the proposal as presented is for a scheme delivering 46 residential apartments including a mix of 22 x 1 bed, 12 x 2 bed and 12 x 3 bed. The proposal will also include 44 car parking spaces, 3 bin stores and 1 cycle store. It is noted that no private amenity space is being proposed, although there may be some communal space.

Currently the site has an existing use relating to the register office, although it is noted that this has now been relocated. It also has a number of trees protected as a result of it being located in the Hoe Conservation Area. It is also worth noting that there are a number of listed buildings in close proximity and the site is located across from the Grade II Registered Park and Garden. Both of which will require further detailed consideration in the scheme's development.

You have requested a principle view of the proposal. As you are aware the site is an allocated site with a specific policy set out in the adopted Joint Local Plan. Policy PLY27 sets out the requirements for the site and can be found using this link but is also set out in brief below. The fundamental requirements of PLY27 require a mixed use development including a quality hotel and housing in the order of 52 homes. It also requires active ground floor frontages, improved east/west public access, relocation of the register office function, innovative parking solutions and high quality public realm improvements.

From the information received and our discussions the proposal presented currently does not fulfil all the requirements of PLY27. Fundamentally there is no hotel, the proposed housing numbers are below that allocated and there are no active ground floor frontages. The proposal as presented is therefore contrary to a number of specific requirements of this policy and as such any further development of the scheme should seek to address these shortfalls. This is a key recommendation from the Local Planning Authority (LPA) for the future evolution of a scheme on this key site.

At present the scheme as a departure from policy would be advertised as such and be taken to Planning Committee for that reason. In addition there would be consultation with the Secretary of State as required for such applications.

If an application were to be submitted along these lines or another alternative similar response to the site, it would need to robustly justify the departure from policy and set out why the policy requirements could not be achieved with in the scheme in the view of your client for the LPA to consider. It should also robustly set out what could be achieved and why this may be acceptable with any evidence to support the justification, for example Housing Need Assessment, viability, feasibility that may be relevant . The proposal would then be considered against all policies within the development plan and any material considerations. That said, as I have set out above, the further development of the scheme through a full pre-application would be the place to start to consider these matters further.

Notwithstanding the above, at our meeting discussion was held about the importance of the trees on site and the need to retain, justify and mitigate any potential loss if loss is deemed appropriate. The discussion included the potential for improving other nearby areas and this needs further consideration to consider the appropriateness given the conservation area, registered park and garden and any potential impact of the views up and through Armada Way to

The Hoe. The starting point is always to retain on site as well as deliver a net gain within the site.

Discussion also included the potential of decked parking and the need to balance car parking with useable and suitable communal / open space, including how to consider private amenity space.

I note that there may be green walls proposed as part of the development. If this is the case it would be worth including any information in an application on fire safety in relation to their provision and maintenance. This is more of a Building Regulations requirement but it is worth considering at this stage and as a scheme develops.

I have set out immediately below a number of other matters not expressly requested / set out in the bespoke pre-app. These are not comprehensive and other matters will also need to be considered. They are set out to be helpful and facilitate future discussions and pre-apps.

You should:

- Consider extending the red line of the application to include relevant footpaths to facilitate public realm improvements
- Include clarity on any east / west public access
- Include commentary on the relocation of the register office function
- Consider the visual impact of the parking arrangements
- Robustly justify why no provision is made for any private amenity space, if this is the case – Policy and the council's SPD set out the requirements relating to this. Again, the starting point and recommendation is to deliver this within the scheme
- Consider residential amenity of residents and neighbours – in this instance I mean in terms of privacy, dominance, potential for overbearing impacts, window to window distances, noise impacts etc
- Clearly set out the biodiversity net gain as well as mitigation for any loss in trees or ecology, noting my point above that this should ideally be onsite
- Consider sun/shading and wind studies and skyline silhouette, as relevant
- Consider incorporating the National Design Guide headings in any urban design response / design and access statements.
- As you have with this scheme it is helpful to include visualisations / montages of the scheme
- Include a statement on compliance with space standards and accessibility

To summarise, as it stands in principle the proposal is contrary to the provisions of policy PLY27. If an application were to be submitted you will need to robustly justify the departure from policy. It is strongly recommended that in taking forward your client's plans for the site that you seek full pre-application advice once the scheme develops. To assist with this and as requested initial advice from key internal consultees is provided below.

Response to internal consultations

Highways

This pre-application enquiry seeks advice on the proposed re-development of the former Plymouth Register Office to provide 46 apartments. The Highway Authority would not wish to raise any in-principle objections to the proposed development.

The site is located on Lockyer Street and is bound to the south by Citadel Road, and to the east by Armada Way. The location of the site is considered to be sustainable and is only a short distance from the City Centre which boasts good public transport links to the rest of the city. Parking restrictions in the form of double yellow lines are present along the eastern, southern and western boundaries and the site lies within a full time operational Controlled Parking Zone (CPZ). It should be noted by the applicant that the properties would be excluded from obtaining permits and visitor tickets for use within this CPZ should the scheme be progressed.

Due to the reasons outlined above, the LHA would accept a reduced level of parking provision at 1x space per dwelling, equating to 46 spaces overall, with E.V charging points provided in line with the details included within the Joint Local Plan SPD.

The level of cycle storage should be provided in accordance with the details contained within the SPD and consideration should be taken to ensure the storage is secure, easily accessible, fully covered and conveniently located.

A Transport Statement assessing the traffic and transport impacts arising as part of the proposed development would need to be submitted with any formal planning application. Comparisons between the impacts generated by the former use of the building as a register office and the new proposed residential use will be required to properly assess whether there is likely to be an increase or decrease in impact as a result of the proposed development. Additionally, the LHA would require the submission of a Travel Plan in order to promote the use of sustainable transport modes and reduce the reliance on single occupancy car journeys. Guidance on providing Travel Plans can be found on the Plymouth City Council website. It should be noted that where a travel plan is required, a travel plan audit and monitoring fee will be payable to Plymouth City Council by the developer. Further details can be found within the Strategic Planning and Infrastructure fees policy which is available to view on the PCC website.

With regard to the new proposed access from Armada Way, additional consent from Plymouth Highways for a Commercial Vehicle Crossing would be required should planning permission be granted. The new access should be designed to ensure safe and suitable access for all road users in accordance with the NPPF.

Due to the close proximity of the site to other residential and commercial units, a Code of Practice during construction will be required, with specific attention paid to deliveries and construction staff parking management. There would also be the requirement for a Highway Dilapidation Survey to ensure any damage caused to the existing highway as a result of the construction activities is rectified by the applicant.

The proposed development has been considered in accordance with the Councils current Development Plan Policies and having regard for the National Planning Policy Framework.

6.5 Initial Council Planning Advice

Natural Infrastructure Team
The following are required:

- Arboriculture Impact Assessment to include Tree Survey and Tree Constraints Plan to see if any existing tees can be retained on site. This can then be used to inform what scale of mitigation is required in relation to potential tree loss, either on or off-site in line with the new requirements in the SPD.
- Biodiversity – we would expect to see a DEFRA biodiversity metric submitted to demonstrate that 10% net gain can be achieved on site.
- Greenspace – during the meeting there was mention of possibly 'enhancing' the greenspace to the east? Before this is considered/pursued we would need input from our Historic Environment/Urban Design/Landscape colleagues in relation to the various designations that apply to this area

Lead Local Flood Authority
As attached.

Housing Delivery Team
Any proposal will need to include affordable housing provision, size of all units, space standard compliance including storage space, 20% Cat m4(2) units, tenure split. Any proposal should also include commentary on provision of outdoor private amenity space. Details of any registered provider, if applicable.

Low Carbon
The applicants would need to submit an Energy Statement, responding to DEV32, accompanied by a resource minimisation and climate resilience statement, as expanded in the SPD and technical guidance. In particular the Energy Statement should address DEV32.3, DEV32.5 and DEV32.6.

Heritage
It has been requested that Urban Design advice is not provided as part of this bespoke pre-app. Design will clearly be a key consideration of any application on this site due to its sensitive location however it shall not be considered here. Future applications will be subject to joint Urban Design and Historic Environment consultation responses. Early engagement with the urban designer is encouraged within the next stage of pre-app.

A comprehensive Heritage Statement written by a suitable qualified professional will be required as part of any future planning application.

There appears to be no direct reference to 'Heritage' issues within either the identified constraints or opportunities in these preliminary documents.

Heritage Considerations

-

- The site lies within the Hoe Conservation Area. The Hoe Conservation Area Appraisal and Management Plan 2008 should be consulted. https://www.plymouth.gov.uk/sites/default/files/HoeConservationAreaAppraisalManagementPlan.pdf
- The setting of the Grade II Registered Park and Garden.
- The setting of Listed Buildings in the vicinity, including (but not exclusive to); The Listed villas on Lockyer Street, Villas on Osbourne Place, the Grade II Listed War Memorial opposite the site, the Grade II listed Christ the King Catholic Chaplaincy, Naval War Memorial.
- An assessment should be made to identify any Non-Designated Heritage Assets which may be impacted.
- A brief statement of Archaeological Potential.
- Consideration must be given to the impact of loss of trees to the character of the Conservation Area.
- 3D images should be submitted showing the development within its setting. These should as a minimum show views from Lockyer Street including the listed villas to assist in interpretation of size and massing and views from within the Registered Park and Garden from both North and South. It is recommended to consult Urban Design officers as they may have further views or images that they would require to assess any further application fully

Economic Development
ED notes that the Hoe is a survey confirmed top City visitor attraction emphasising the need for a quality building in this prominent location. Furthermore, residential development within and south of the City Centre would normally require a contribution towards Hoe Foreshore enhancement works (in the order of £1,000 per dwelling). The employment associated with the previous use has been relocated so the loss of employment space is not seen to be a negative factor for residential development on the site.

S106
In terms of the potential for S106 requirements, I have received an approximate figure which is a starting point and a likely maximum requirement. This of course is likely to change depending on the scheme that is submitted to the Local Planning Authority. It is included to facilitate the application process. The figure includes, natural infrastructure, education and health contributions but does not include any affordable housing contribution as it is assumed this will be delivered on site as per policy DEV7. The approximate figure is £806,000.00. There will also be a community infrastructure levy requirement.

Clarity on relevant policies
Below are the most relevant Joint Local Plan policies relating to the proposal presented. Depending on the final scheme there may be other relevant polices (e.g. DEV16 - Providing retail and town centre uses in appropriate locations) that you will need to consider along with the council's supplementary planning document (SPD), relevant masterplans and/ or site planning statements, Conservation Area Appraisals and the National Design Guidance. However I

have set out the most relevant Joint Local Plan policies at this stage.

Pertinent polices and key policy criteria

Policy PLY27 - Register office, Lockyer Street, The Hoe
Land at Lockyer Street, The Hoe, is allocated for mixed use development, including a quality hotel and housing. Provision is made for in the order of 52 homes.
Development should provide for the following:
1. High quality architecture that maximises the site's redevelopment potential and the site's role as a strategic gateway to Armada Way. The design should be informed by a detailed heritage character assessment to be undertaken for the proposal and should conserve and where appropriate enhance the character or appearance of the Hoe Conservation Area and Registered Park and Garden.
2. Active ground floor frontages to be encouraged to enliven all public streets and spaces – Armada Way and Citadel Road in particular.
3. Improved east / west public access along the site's north boundary, linking Armada Way to Lockyer Street.
4. High quality public realm including enhancement of Armada Way.
5. Innovative car parking solutions to reduce the visual impact of vehicles on the public realm.
6. Relocation of the register office function.

PLY20 Managing and enhancing Plymouth's waterfront:
Protecting and enhancing The Hoe's unique man-made and natural heritage and using development and public realm measures proactively to repair damaged environments, re-use historic buildings and enhance the overall enjoyment of the area by visitors and residents.

PLY21 Supporting visitor economy
1. Strategic opportunities for new high quality hotels will be protected, especially on sites which reinforce Plymouth's unique assets such as its waterfront, heritage and culture, including offering views over Plymouth Sound.
4. Development proposals which result in the loss of important facilities for the visitor economy, including visitor accommodation, will not be permitted unless:
i. There are over-riding sustainability and regeneration benefits from the proposal.
ii. The existing use is demonstrated to be unviable and with no reasonable prospect of becoming viable.

DEV 1 Protecting health and amenity
DEV 2 Air, water, soil, noise, land and light
- Contaminated land
- AQMA

DEV 7 Meeting local housing need in the Plymouth Policy Area
- AH policy requirement (30%)
- Mix of sizes and tenures

DEV 9 Meeting local housing need in the Plan Area
- innovative housing models that meet the local demand/need
- 20% Cat m4(2) on schemes 5 and above - 2% Cat M4(3) on schemes 50 and above

DEV10 Delivering high quality housing
- High quality design
- Meet NDSS

DEV19 Provisions for local employment and skills
- Employment Skills Plan
- Contribution for loss of employment - TBC

DEV20 Place shaping and the quality of the built environment
- Contribute positively to the townscape
- Regard to pattern of development and local distinctiveness
- Building for life criteria

DEV21 Development affecting the historic environment
- Sustain the local character by conserving and enhancing heritage assets
- Impact on listed buildings, conservation area and the registered park and garden

DEV23 Landscape character
- Conserve and enhance the characteristics and views of the area along with valued attributes and existing site features such as trees
- Restore positive landscape characteristics

DEV26 Protecting and enhancing biodiversity and geological conservation
- Development should support the protection, conservation, enhancement and restoration of biodiversity and geodiversity
- Net gain in biodiversity
- Loss of tree mitigation

DEV28 Trees, woodlands and hedgerows
- Tree retention or mitigation

DEV29 Specific provisions relating to transport
- New access and parking
- Cycle parking
- EVC parking
- Travel plan

DEV30 Meeting the community infrastructure needs of new homes
- Major housing developments will be considered in the context of the sufficiency (or otherwise) of the community infrastructure to meet the demands generated by the development

DEV31 Waste management
- Site waste management plan

DEV32 Delivering low carbon development
- As set out in the policy criteria
- 20% renewable
- Connect to or be able to connect to District heating

DEV35 Managing flood risk and water quality impacts
- incorporate sustainable water management measures
- Flood risk assessment / drainage strategy as a result of critical drainage area.

DEL1 - Approach to development delivery and viability, planning obligations and the Community Infrastructure Levy
- Planning conditions
- CIL
- S106

6.5 Initial Council Planning Advice

You are advised to review the adopted SPD particularly in relation to affordable housing, transport requirements (including cycling); biodiversity and the need for a 10% net gain, and the energy chapter. The new SPD can be found following this link. In addition, the appendices are particularly relevant where they relate to New works in Conservation Areas (Appendix 5) materials (Appendix 2), and biodiversity (Appendix 6).

Validation requirements
We have recently adopted a new validation list found here. This includes updated and potentially new validation requirements. Having reviewed the document the following are likely to be relevant to any application you may submit. Please note these are over and above the national requirements which include the standard/usual number and quality of plans including cross sections, a completed application form, a design and access statement, a completed CIL form and the fee.

Depending on the quantum of development - Likely requirement:

- An Affordable Housing Statement - should give specific details of the affordable housing offer
- A standard of residential accommodation statement – How development meets space standards
- Archaeological Assessment - Where any proposal includes works on or adjoining a site of known or suspected archaeological interest.
- Community Involvement Statement – As it is a (potentially) departure from the Joint Local Plan
- Contaminated Land Assessment
- Ecological Information
    - Preliminary Ecological Assessment (PEA) and if required by the PEA further protected species surveys.
    - Ecological Impact Assessment (EcIA) (possibly including a CEMP or LEMP)
    - DEFRA Biodiversity Matrix completed
    - Ecological Constraints and Opportunities Plan
    - Biodiversity Budget Table
    - Arboriculture Impact Assessment to include Tree Survey and Tree Constraints Plan
- Statements relating to Low Carbon Development:
    - Sustainability Statement – Proportionate to scale of development
    - Energy Statement or Strategy - Proportionate to scale of development
- Flood Risk Assessment – The application site is in a Critical Drainage Area
- Drainage Strategy
- (Employment Skills Plan – This can be conditioned if an application were to be approved)
- Evidence to Inform a Habitat Regulations Assessment (HRA)
- Heritage Statement / Heritage Impact Assessment
- Landscaping scheme
- Accessible and Adaptable and Wheelchair User Dwellings – can be included in the design and access statement
- Noise Assessment – Potentially - Given the potential for differing uses (mixed use development) and the residential a noise assessment/response may be appropriate. This, where relevant should consider hours of operation, sound proofing, impact and timing of deliveries, agent of change relating to the nearby night time economy. Further advice can be obtained from our Public Protection Service (additional cost).
- Parking provision - – can be included on the plans or within the transport information – should include electric charging point information
- Planning obligations - draft heads of terms, solicitor's detail, applicant's details, viability appraisal and assessment fee (where relevant)
- Refuse disposal
- Site Waste Management Plan
- Tall Buildings Report (if relevant) – only if building is significantly higher than its neighbours and recognisably changes the skyline.
- Transport Statements, Transport Assessments and Travel Plans
- Secured by Design Statement – can be included in the design and access statement

Potentially a requirement
- Air Quality Assessment – For major development within/or adjacent to an Air Quality Management Area (AQMA) and/or Development in excess of 100 dwellings or 10,000m2 new floorspace
- Town Centre uses - statement of justification

Guidance on the content of these requirements is given in the Validation List and as such you are recommended to review the list before commencing / commissioning any studies.

I hope this information is of help. As I have set out throughout the response, it is the view of the LPA that your client's proposal for the site should be further developed taking on board this initial advice and that future detail pre-application advice should be entered into. I am available to discuss this process should you wish and we are happy to consider how any such engagement could be structured through a planning performance agreement should you wish to receive a bespoke Pre-application process.

PLEASE READ THESE NOTES CAREFULLY
Any advice given by council officers following pre-application enquiries does not constitute a formal response or decision of the council in respect of any future planning applications.
Any views or opinions expressed are given in good faith, and to the best of ability, based on existing planning policies and standards, without prejudice to the formal consideration of any future planning application. The final decision on any application that you may then make can only be taken after the Council has consulted local people, statutory consultees and other interested parties. The final decision on an application will then be made by senior planning officers or by the Council's planning committee and will be based on all of the information available at the time.
It follows that officers cannot give any guarantees about the final formal decision that will be made on any future planning application. However, any pre-application advice that has been provided will be carefully considered in reaching

a decision or recommendation on an application, subject to the proviso that circumstances and information may change, and so alter that position. (The weight given to pre-application advice notes will inevitably decline over time and little or no weight may be given to the Council's pre-application advice for schemes which are submitted more than two years after the advice being issued.)
Any advice given in relation to planning history of the site, planning constraints or statutory designations does not constitute a formal response under the provisions of the Local Land Charges Act 1975.
Pre-application requests for advice are made public and documents will normally be released if we receive a freedom of information request or environmental information request and our file notes will form part of the public file if an application follows. We cannot therefore guarantee confidentiality. If the information you provide includes commercially sensitive or confidential information this should be clearly stated at the head of the submission. We can then take this into account should an FOI/EIR request be received.

Kind regards
Marie

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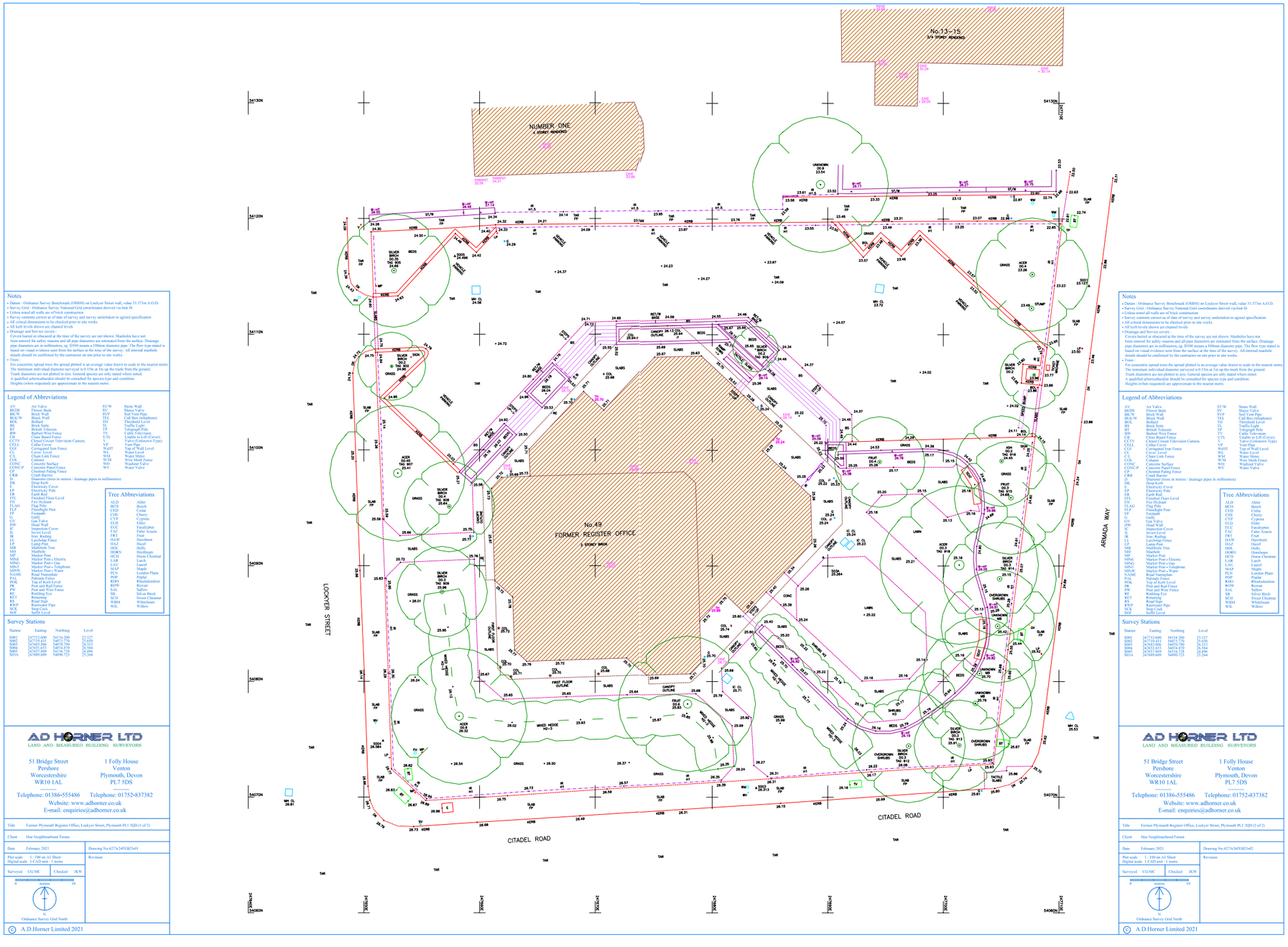
LLFA Response.pdf

6.6 A.D Horner
Topographical Survey



Notes
• Datum : Ordnance Survey Benchmark (OSBM) on Lockyer Street wall, value 31.573m A.O.D.
• Survey Grid : Ordnance Survey National Grid co-ordinates derived via host fit
• Unless noted all walls are of brick construction
• Survey contents correct as of date of survey and survey undertaken to agreed specification
• All critical dimensions to be checked prior to site works
• All kerb levels shown are channel levels
• Drainage and Service covers :
Covers buried or obscured at the time of the survey are not shown. Manholes have not been entered for safety reasons and all pipe diameters are estimated from the surface. Drainage pipe diameters are in millimetres, eg. D100 means a 100mm diameter pipe. The flow type stated is based on visual evidence seen from the surface at the time of the survey. All internal manhole details should be confirmed by the contractor on site prior to site works.
• Trees :
For concentric spread trees the spread plotted is an average value drawn to scale to the nearest metre. The minimum individual diameter surveyed is 0.15m at 1m up the trunk from the ground. Trunk diameters are not plotted to size. General species are only stated where noted. A qualified arboriculturist should be consulted for species type and condition. Heights (when requested) are approximate to the nearest metre.
Legend of Abbreviations
Tree Abbreviations
Survey Stations
AD HORNER LTD
LAND AND MEASURED BUILDING SURVEYORS
51 Bridge Street, Pershore, Worcestershire, WR10 1AL
1 Folly House, Venton, Plymouth, Devon, PL7 5DS
Telephone: 01386-555486 Telephone: 01752-837382
Website: www.adhorner.co.uk
E-mail: enquiries@adhorner.co.uk
Title Former Plymouth Register Office, Lockyer Street, Plymouth PL1 2QD (2 of 2)
Client Hoe Neighbourhood Forum
Date February 2021
Drawing No.6273-24FEB21-02
Plot scale 1 : 100 on A1 Sheet
Digital scale 1 CAD unit : 1 metre
Revision
Surveyed CG/MC Checked JKW
Metres 0 10
Ordnance Survey Grid North
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The natural choice for good advice

Preliminary Ecological Appraisal

Plymouth Registry Office, Plymouth, Devon

February 2021

A report by

Yolande Knight BSc (Hons), PhD, MRSB, Ecologist
Natural England licence no: 2020-47431-CLS-CLS

Report details

Site address:	Plymouth Registry Office, Lockyer Street, Plymouth, Devon PL1 2QD
Grid reference:	SX 476540
Survey date:	10th February 2021
Report date:	15th March 2021
Report author:	Yolande Knight BSc (Hons) PhD, MRSB (Natural England licence no: 2020-47431-CLS-CLS)
Report reviewer:	Colin Hicks BSc (Hons), MCIEEM
Report no:	WOR 1913

Declaration of compliance

BS 42020:2013

This study has been undertaken in accordance with British Standard 42020:2013 Biodiversity, Code of practice for planning and development.

Code of Professional Conduct

The information which we have prepared is true, and has been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management's Code of Professional Conduct. We confirm that the opinions expressed are our true and professional bona fide opinions.

Validity of survey data and report

The findings of this report are valid for 24 months from the date of survey. If work has not commenced within this period, an updated survey by a suitably qualified ecologist will be required.

6.7 Western Ecology
Preliminary Ecological Appraisal

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Non-technical summary

Western Ecology has been commissioned to complete a Preliminary Ecological Appraisal of land and building at Plymouth Registry Office, Plymouth, Devon. Proposals for this site are currently unknown.

The Site comprises one building with hardstanding, amenity grassland and associated garden planting and a mix of native and non-native scattered trees to all sides. Walls provide partial interior boundaries and fencing exterior boundaries.

To ensure compliance with nature conservation legislation and planning policy, the following recommendations are made with regards to species:

Bats

The Registry Office has been assessed as having low suitability for roosting bats. Depending on the proposal for this site, further surveys may be required for roosting bats.

Nesting birds

It is likely that occasional common bird species nest within Site habitats. If any of these habitats are to be cleared or disturbed during the accepted bird nesting season (March to August inclusive), the habitat should be thoroughly inspected, by a suitably qualified person, prior to disturbance. If nesting birds are found, all activities likely to damage the immediate area should be delayed until chicks have fledged.

Invasive Non-native Species

Montbretia is growing within this site. Control of Montbretia is recommended and may best be achieved using a suitable herbicide applied in line with the manufacturer's recommendations.

To ensure compliance with nature conservation legislation and planning policy, the following recommendations are made with regards to Statutory and Non-statutory Nature Conservation Sites:

Plymouth Sound and Estuaries Special Area of Conservation (SAC)

The Site is within the Zone of Influence for Plymouth Sound and Estuaries European Marine Site (EMS): depending on local planning policy, a contribution may be required to mitigate against increased recreational pressures on this Natura 2000 site.

Further survey work

It is recommended that the following species/group specific surveys are completed to ensure compliance with wildlife legislation and relevant planning policy:

Bats- roosting

Depending upon development proposals, the Registry Office will require at least one emergence survey using five trained surveyors. If bats are seen to emerge, a second emergence survey would be required, and any mitigation formulated once the results of this survey work is known. These surveys can only be completed in the optimal bat

survey period, May to September inclusive (with at least one survey between May and August inclusive).

Nesting birds

If site construction is likely to impact potential bird nesting habitats along the boundaries in the period March to August, these habitats should be thoroughly inspected, prior to the start of work, for nesting birds by a suitably qualified person. If nesting birds are found, all activities likely to damage or disturb the nesting area should be delayed until chicks have fledged.

1. Introduction

Western Ecology has been commissioned to complete a Preliminary Ecological appraisal of land and building at Plymouth Registry Office, Plymouth, Devon. Proposals for this site are currently unknown.

1.1. Survey aims

The survey and this report identify features of conservation importance that could constitute a constraint to the proposals for this site. Where appropriate, recommendations for impact avoidance, mitigation and post-development enhancement are made to ensure compliance with wildlife legislation and relevant planning policy.

This survey has been prepared in accordance with the 'Guidelines for Preliminary Ecological Appraisal' produced by the Chartered Institute of Ecology and Environmental Management (CIEEM, 2017).

1.2. Site location

The area of land surveyed is situated in the Barbican area of Plymouth, SW Devon, 330m to the north of the coastline. The site in total comprises an area of land totalling approximately 0.27 hectares.

2. Survey methodology

2.1. Desktop survey

A full search of the biological records was not considered appropriate due to the small size of the site, and the lack of semi-natural habitats with the potential for notable species.

The desktop survey identified any statutory nature conservation sites that may be affected by the proposals. This comprises an important part of the assessment process, providing information on ecological issues that may not be apparent during the site survey. Consultees for the data search included:

- Natural England - GIS datasets of Statutory Nature Conservation Sites.
- Devon County Council - Interactive Map, Environment

The location of nature conservation sites was examined to determine their ecological and landscape relationships with the proposed site. An assessment was then made of how the sites may be affected by the proposal, taking into account these relationships, and the species and/or habitat types for which the nature conservation site was chosen.

2.2. Field survey

A Preliminary Ecological Appraisal of the site was completed by Michael Sanders BSc (Hons), (Natural England licence no: 2016-24281-CLS-CLS) and Yolande Knight BSc (Hons) PhD, MRSB (Natural England licence no: 2020-47431-CLS-CLS).

The survey was completed on 10th February 2021 between 11:00 and 11:45 with an air temperature of 1°C, with 90% cloud, calm and dry.

Habitats were classified using the Phase 1 Habitat Survey methodology developed by the Joint Nature Conservation Committee (JNCC, 2010) and modified by the Institute of Environmental Assessment (IEA, 1995). The main plant species were recorded and broad habitat types mapped. Habitats encountered are described within the Results section, with a map included within the report. Plant species were identified according to Stace (1997).

All areas of the building were carefully examined internally and externally for signs of use by bats, with the aid of torches, by a suitable qualified and licenced ecologist. This included a search for bat droppings, feeding remains, urine stains and polished/scratched woodwork. A search was also made for individual bats, as well as potential access points and cavities capable of providing a roosting space for bats.

This survey method complies with guidelines produced by the Bat Conservation Trust (Collins, 2016).

2.3. Method for valuation of habitats

The ecological value of habitats present is provided in line with Guidelines for Ecological Impact Assessment (CIEEM, 2016), and those which are important in terms of legislation or policy are identified.

The nature conservation value, or potential value, of the habitat is determined within the following geographic context:

- International importance (e.g. internationally designated sites such as Special Areas of Conservation, Special Protection Areas, Ramsar sites);
- National importance (e.g. nationally designated sites such as Sites of Special Scientific Interest or species populations of importance in the UK context);
- County importance (e.g. SNCI, habitats and species populations of importance in the context of Devon);
- Local importance (e.g. important ecological features such as old hedges, woodlands, ponds);
- Site importance (e.g. habitat mosaic of grassland and scrub which may support a diversity of common wildlife species);
- Negligible importance. Usually applied to areas such as built development or areas of intensive agricultural land.

The examples are not exclusive and are subject to further professional ecological judgment.

2.4. Survey constraints

All areas of the site were readily accessible. Although some plant species would have not been visible during the survey period, within such a small, simple site comprising common and widespread habitat types, the timing of this survey is not a significant constraint to a robust initial site assessment.

It should be noted that habitats, and the species they may support, change over time due to natural processes and because of human influence. In line with current guidelines, the survey on which this report is based is only valid for one year, after which time it will need updating. This report is valid until 10th February 2022.

2.5. Study area

The study area for the desktop survey is within 2km for statutory conservation sites and 1km for non-statutory conservation sites. The study area for the Preliminary Ecological Appraisal was the footprint of the proposed development, hereafter referred to as the ‘Site’, and its immediate boundaries. This is the area included within the line described as “Survey area” within the legend of Map 1.

3. Results

3.1. Site description

The Site comprises one building with hardstanding, amenity grassland and associated garden planting and a mix of native and non-native scattered trees to all sides. Walls provide partial interior boundaries and fencing the exterior boundaries.

3.2. Phase 1 habitats

Habitats have been classified using the Phase 1 Habitat Survey methodology, and are described below and detailed in Map 1. Habitats which are important in terms of legislation or policy are identified and the extent of all habitats associated with the survey area is given in Table 1. Plant species that characterise each of these habitats are identified, although this is for descriptive purposes, and comprehensive inventory is not provided.

Table 1. Habitat descriptions

Habitat type	Description	Biodiversity value	Extent
Building	The Registry Office is a brick and block building with a two storey section to the south and areas of single storey section to the north and east. The two storey section has a shallow hipped metal roof, whilst the single storey section is has a shallow metal pitch to the north-west, north-east and south-east. The interior has suspended ceilings, with the voids boarded to the underside. The exterior has suitable gaps for crevice-dwelling bats at the wall top capping/fascia on both levels, and there are suitable gaps under eaves, with membrane visible. The building has low potential for crevice-dwelling bats.	**TBC**	665m^2
Amenity grassland	Areas of close-managed amenity grassland are present to the east, south and west of the Site, with common grass species including dominant Perennial Rye and occasional Fescue spp., with sparse forbs such as Creeping Buttercup, Common Daisy and Dandelion.	Negligible	617m^2
Scattered trees and introduced shrubs	Scattered native and non-native trees are present throughout, with frequent mature native and non-native Birch spp., occasional Hazel, Sycamore and Wild Cherry, and non-native Oak spp. Beds of garden planting including mature introduced shrubs such as Buddleia, Cherry Laurel and Camelia spp. are present in ground beds, with understorey either negligible due to bark chipping, or areas of Ivy with occasional forbs such as Bluebells and Herb Robert. Montbretia is present in the western walled garden area. Small, raised beds with planting such as Rosemary and Daffodils are present to the north of the building.	Site	434m^2
Tarmac hardstanding	Hardstanding is present to the north of the Site, with paths to all sides of the building.	Negligible	985m^2

Fencing	Metal fencing is present around the exterior boundary of the Site.	Negligible	187m
Walls	Walls are present to the east of the Site, occasionally vegetated with Ivy.	Site	53m



Building viewed from north.



Interior of void associated with suspended ceiling.



Gap at wall top capping/fascia.



Gap at wall top capping.

3.3. Desktop survey

Statutory nature conservation sites (SCNS)

Five SNCS are present within 2km of the centre of the Site:

Plymouth Sound and Estuaries Special Area of Conservation (SAC) is situated 360m to the south and is designated for:

Annex I habitats that are a primary reason for selection of this site:

- Sandbanks which are slightly covered by sea water all of the time
- Estuaries
- Large shallow inlets and bays
- Reefs
- Atlantic salt meadows

Annex I habitat present as a qualifying feature:

- Mudflats and sandflats not covered by seawater at low tide

Annex II species that are a primary reason for selection of this site:

- Shore dock *Rumex rupestris*

Annex II species present as a qualifying feature:

- Allis shad *Alosa alosa*

Plymouth Sound Shores and Cliffs Site of Special Scientific Interest (SSSI) is situated 1.14km to the south-west of the Site. Open coast and sheltered bays including shore communities with a south-western influence (boundaries follow Mean Low Water).

Wallsend Industrial Estate SSSI is situated 1.6km to the south-east of the Site and is of geological interest.

Western King SSSI is situated 1.6km to the south-west of the Site. In addition to being of geological interest, the Site also includes colonies of the nationally rare Field Eryngo *Eryngium campestre.*

Richmond Walk SSSI is situated 1.6km to the west and is of geological interest.

The Site is within the Zone of Influence for Plymouth Sound and Estuaries European Marine Site (EMS).

Non-statutory nature conservation sites (NNCS)

Plymouth Road and Madeira Road County Wildlife Site (CWS) is situated 240m to the south.

SSSI Impact Risk Zones

There is no development currently proposed. Taking into account the size and position of the Site, it is not within an area identified as a SSSI Impact Risk Zone for any development possible within the Site.



western ECOLOGY

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email: office@westernecology.co.uk

Legend

- Target note
- Scattered trees
- Fence
- Wall
- Survey area (Approximate)
- Scattered trees and shrub planting
- Amenity grassland
- Building
- Tarmac

Title: Map 1. Phase 1 Habitat Survey

Project: Plymouth Registry Office, Lockyer Street, Plymouth.

Checked by: CDH Version: 01
Date: 04/03/2021

3.4. Potential for species of nature conservation importance

Habitats have been assessed from the results of the field survey for their potential to support the following protected species. Where there is no potential for a species or species group to be present within the site, or where habitats with the potential to support this species or species group will not be impacted by the proposals, they may be scoped out at this stage.

Table 2: potential for protected species.

Species	Assessment	Potential for presence
Amphibians	The Site is isolated within an urban environment, and there is no aquatic habitat within or near the Site that has the potential to support breeding amphibians. Amphibians do not need to be considered further. The Site is within a Great Crested Newt Consultation Zone.	Negligible
Badgers	The Site is isolated within an urban environment, there is no evidence of Badgers within the Site, and they do not need to be considered further.	Negligible
Bats	The registry office building has a number of gaps providing potential for crevice-dwelling bats. The building has low suitability for roosting bats. The Site is surrounded by well-lit residential areas to the north, east and west, with managed, lit parkland to the immediate east and south: as such, it is unlikely that light-averse species will be active around the Site boundaries. The scattered tree and shrub habitat within the Site provides low potential for foraging non-light-averse bats. A mature Lime tree, off-site, but adjacent to the northern boundary, has Potential Roosting Features visible on the south-western facing side of the tree in the form of at least one knot hole.	Low Low Possible.
Birds	Trees and shrubs within the Site provide potential for nesting birds, with evidence of possible Magpie and Pigeon nests in a number of the mature trees.	Present
Common Dormice	Dormice are arboreal and are found within areas of habitat with woodland and fruiting woody shrubs. This Site is isolated in an urban environment, with regular disturbance from adjacent residences by cats. It is unlikely that Dormice are present, and they do not need to be considered further.	Negligible
Hedgehog	Limited potential habitats.	Negligible
Reptiles	The habitats within and bounding the Site have negligible potential for foraging or hibernating reptiles, and they do not need to be considered further.	Negligible
Otter	No suitable water bodies	Negligible
Water Vole	No suitable water bodies	Negligible
Notable invertebrates	Habitats at this site are likely to support common and widespread invertebrates, although priority invertebrate habitats such as flushes, suitable brown-field land and soft rock cliffs are absent from the site	Negligible
Notable plants	Habitats within the Site provide little potential for notable or rare plants and they do not need to be considered further.	Negligible
Invasive non-native plants	Montbretia is present within the planted garden habitat.	Present

4. Evaluation of ecological features and potential impacts

4.1. Introduction

Ecological features that have the potential to be present have been assessed in light of current nature conservation policy, planning policy and wildlife legislation by an experienced ecologist (see Appendix 1). Where necessary, the ecological value of an ecological feature is given along with the potential effect of the proposed development.

If it is considered that the proposed development is likely to have no effect on features that have been identified as present, or potentially present, they may be scoped out at this stage.

4.2. Habitats of nature conservation importance

Protected habitats

Habitats are protected under international and national legislation including The Conservation of Habitats and Species Regulations 2017, and Wildlife and Countryside Act 1981 (as amended). These have been formulated into policy measures, with many examples protected under formal site designations such as SSSIs and SACs.

No habitats of European Community Importance as defined within The Conservation of Habitats and Species Regulations 2017 were present within this site. Protected habitats of this type are not a consideration for this project.

Notable habitats

Sixty five habitats are listed as being of principal importance, in the Secretary of State's opinion, for the purposes of conserving biodiversity. Under section 41 (England) of the NERC Act (2006) there is a need for these habitats to be taken into consideration by a public body when performing any of its functions with a view to conserving biodiversity. These habitats are the subject of National and Local Biodiversity Action Plans.

Hedgerows are given particular protection under the Protection of Hedgerows Act 1997.

There are no notable habitats associated with the Site, and they are not a consideration for this project.

4.3. Species of nature conservation importance

Overview

Many native wild plants and animals are protected by law with the two main legal instruments being the Wildlife and Countryside Act 1981 (as amended) and The Conservation of Habitats and Species Regulations 2017. The latter consolidates amendments to the Conservation (Natural Habitats, &c) Regulations 1994 which transposed into UK Law the EU Habitats Directive.

One thousand, one hundred and fifty species of fungi, plant or animal are listed as being of principal importance, in the Secretary of State's opinion, for the purposes of conserving

biodiversity. Under section 41 (England) of the NERC Act (2006) there is a need for these species to be taken into consideration by a public body when performing any of its functions with a view to conserving biodiversity. These species are the subject of National and Local Biodiversity Action Plans.

Bats

Bat species and their breeding or resting places (roosts) are protected under the Wildlife and Countryside Act 1981 (as amended), and The Conservation of Habitats and Species Regulations 2017. They are identified as European Protected Species. Under these laws it is an offence to:

- capture, kill, disturb or injure bats (on purpose or by not taking enough care);
- damage or destroy a breeding or resting place (even accidentally);
- obstruct access to their resting or sheltering places (on purpose or by not taking enough care); or
- possess, sell, control or transport live or dead bats, or parts of them.

Seven species of bat are listed as species “of principal importance for the purpose of conserving biodiversity”.

As part of the assessment, it is required that the buildings are valued for their suitability to support roosting bats, irrelevant of any signs of roosting. This is due to the highly cryptic nature of bats, in particular those species that roost in crevice habitat associated with roof coverings, fascia, soffit, bargeboards, flashing, feather boarding and stonework.

Buildings are valued as follows (Collins et al, 2016):

- Negligible suitability - Negligible habitat features on site likely to be used by roosting bats

- Low suitability - A structure with one or more potential roost sites that could be used by individual bats opportunistically. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity or hibernation).

- Moderate suitability – A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status.

- High suitability - A structure or tree with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat.

The registry office building has a number of gaps providing potential for crevice-dwelling bats. The building has low suitability for roosting bats.

Although the Site is small, scattered trees and shrub planting provide low potential for foraging bats, although this will likely be limited to bats that are not light averse, such as Common Pipistrelle. It is unlikely that light-averse bats, such as Long-eared, Horseshoe and Myotid bats, are regularly active here.

The loss of habitat to the development would not impact local foraging bat species, and no mitigation is recommended.

A mature Lime tree, off-site, but adjacent to the northern boundary, has Potential Roosting Features visible on the south-western facing side of the tree in the form of at least one knot hole. If development is likely to impact this tree, for example disturbance via close construction works, then mitigation may be required.

Birds

All wild birds are protected under the Wildlife and Countryside Act 1981 (as amended) from being killed, injured or captured whilst their nests and eggs are protected from being damaged, destroyed or taken. Birds which are listed under Schedule 1 of the Act are given additional protection against disturbance.

Fifty-nine species of bird are listed as species “of principal importance for the purpose of conserving biodiversity”.

Occasional common birds nest within hedgerow and tree habitats present on Site, including several Magpie and Pigeon nests. Any activities which impact these habitats have potential to adversely impact nesting birds. Any site clearance is likely to require mitigation for nesting birds.

Any activities that expose invertebrates, such as earth worms and grubs, will provide an additional food resource for local birds and will have a positive temporary effect, particularly when adults are feeding nested chicks.

4.4. Invasive Non-native Species

Schedule 9 plant species

Schedule 9 of the Wildlife and Countryside Act 1981 (as amended), relates to the introduction of plant and animal species that are not native to the UK. It is an offence to 'cause to grow in the wild' and spread any plant that is listed under this Schedule. This includes the Montbretia growing within the Site. Control of this plant is recommended.

4.5. Statutory Nature Conservation Sites

Natural England has assessed the potential for various development types to impact nearby statutory nature conservation sites when they created SSSI Impact Risk Zones. Any development type possible within the small Site is unlikely to be of a type that Natural England judges to be a risk to statutory nature conservation sites. No mitigation is required and there is no requirement to consult Natural England on the potential impact on these sites.

The Site is within the Zone of Influence for Plymouth Sound and Estuaries European Marine Site (EMS): mitigation may be required.

4.6. Non-Statutory Nature Conservation Sites

One NNCS is within 1km of the centre of the Site.

Due to separation distance, and taking into account the habitats currently present on Site and the potential impact of any development type possible in relation to the size and urban position of the Site, it extremely unlikely that any proposed development would adversely impact the species and habitats for which this site has been selected.

5. Recommendations for mitigation and further surveys

5.1. Mitigation

Where there is potential that the proposed development will have a significant[1] effect on a valued ecological feature of nature conservation interest, recommendations for mitigation are made based on the mitigation hierarchy suggested in Paragraph: 018 Reference ID: 8-018-20140306 of National Planning Practice Guidance;

> Avoidance –significant harm to wildlife species and habitats should be avoided through design.
> Mitigation – where significant harm cannot be wholly or partially avoided, it should be minimised by design, or by the use of effective mitigation measures that can be secured by, for example, conditions or planning obligations.
> Compensation – where, despite whatever mitigation would be effective, there would still be significant residual harm, as a last resort, this should be properly compensated for by measures to provide for an equivalent value of biodiversity.

Where the detail of a proposal is unknown, such as in outline planning applications, general mitigation will be suggested. This should be re-addressed once final plans are known.

Further survey work

Where further survey work is not recommended, this is because it is the professional judgement of the ecologist that adequate information is already available and further surveys would not make any material difference to the assessment provided. Where the information within this report is insufficient to allow a full description of the nature conservation features of the site along with a robust assessment of the potential effects on these features, further survey work will be recommended.

5.2. Habitats of nature conservation importance

No recommendations are made with regards to habitats to ensure compliance with nature conservation legislation and planning policy.

5.3. Protected species and species of nature conservation importance

To ensure compliance with nature conservation legislation and planning policy, the following recommendations are made with regards to species:

Bats

The registry office has low suitability for crevice-dwelling bats. Depending on the proposal for the Site, a precautionary emergence/re-entry survey is recommended within the optimal survey season (May-August) to allow confidence in an assessment that bats are not roosting here. Once further detail of the proposal is known, a suitably qualified ecologist should assess the plans to determine if emergence surveys are needed.

[1] For the purposes of this report, a practical approach has been taken to define the term 'significant'. If an effect is sufficiently important to be given weight in the planning process or to warrant the imposition of a planning condition, it is likely to be 'significant' in the context of the level under consideration (BSI, 2013).

Although the site has low potential for foraging and commuting bats, taking into account the limited footprint of the Site, and the good potential of adjacent parkland habitat, it is considered that bat activity transects are not proportionate to the negligible level of risk to foraging and commuting bats posed by any development.

Nesting birds

Hedgerow and tree habitat may support occasional widespread and common nesting bird species. Any activities affecting these habitats should be completed during the period September to February inclusive, outside the accepted bird nesting season. If this is not practicable, prior to the start of works these habitats should be thoroughly inspected by a suitably qualified person prior to disturbance or removal. If nesting birds are found, all activities likely to damage the immediate area should be delayed until chicks have fledged.

5.4. Invasive Non-native Species

Montbretia is growing within this Site. Control is recommended to prevent spread, and may best be achieved using a suitable herbicide applied in line with the manufacturer's recommendations. All arisings, including associated soil and root material will be disposed of in licenced landfill, or retained onsite.

5.5. Statutory Nature Conservation Sites

The Site is within the Zone of Influence for Plymouth Sound and Estuaries European Marine Site (EMS): depending on local planning policy, a contribution may be required to mitigate against increased recreational pressures on this Natura 2000 site.

5.6. Summary of net gains and losses

Table 3 provides a summary of net gains and losses to biodiversity resulting from the proposed development with mitigation, but without biodiversity enhancement.

Table 3. Summary of net gains and losses to biodiversity

Nature conservation feature	Potential impact	Proposed mitigation	Outcome/Comments
Bats (roosting)	Damage or destruction of roost, disturbance. Potential for an offence.	To be determined based on development proposals. Further surveys may be required.	To be confirmed
Nesting Birds	Direct harm or injury during site clearance Increased food items during construction	Any activities affecting possible nesting habitats, should be completed during the period September to February inclusive, outside the accepted bird nesting season.	Direct harm and injury avoided Temporary positive gain
Pest species - Montbretia	Possible spread across Site and wider area. Potential for an offence.	Control and ideally removal and appropriate	Impact avoided.

		disposal of material and associated soil.	
Plymouth Sound and Estuaries EMS	Potential increased recreational pressures on Plymouth Sound and Estuaries EMS.	Depending on local planning policy, a contribution may be required to mitigate against increased recreational pressures on this Natura 2000 site.	TBC

6. Further survey work

Information within this report is sufficient to allow a robust assessment of the potential effects on the majority of ecological features associated, or potentially associated, with this site.

However, it is recommended that the following species/group specific surveys are completed to ensure compliance with wildlife legislation and relevant planning policy:

Bats- roosting

Depending upon development proposals, the Registry Office will require at least one emergence survey using five trained surveyors. If bats are seen to emerge, a second emergence survey would be required, and any mitigation formulated once the results of this survey work is known. These surveys can only be completed in the optimal bat survey period, May to September inclusive (with at least one survey between May and August inclusive).

Nesting birds

If site construction is likely to impact potential bird nesting habitats in the period March to August, these habitats should be thoroughly inspected, prior to the start of work, for nesting birds by a suitably qualified person. If nesting birds are found, all activities likely to damage or disturb the nesting area should be delayed until chicks have fledged.

No other survey work is recommended for this site.

7. References

BSI, 2013. *British Standard 42020: 2013. Biodiversity – Code of practice for planning and development.* British Standards Institution, London.

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Collins, J. (ed.), 2016. Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edition). The Bat Survey Trust, London. ISBN-13 978-1-872745-96-1

Institute of Environmental Assessment (IEA), 1995. *Guidelines for Baseline Ecological Assessment,* Institute of Environmental Assessment. E&FN Spon, aJn Imprint of Chapman and Hall. London.

Joint Nature Conservation Committee, 2010. . Reprinted by JNCC, Peterborough

JNCC and Defra (on behalf of the Four Countries' Biodiversity Group), 2012. *UK Post-2010 Biodiversity Framework*. July 2012.

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8. Appendix 1:

Legislation and Policy used to assess habitats and species:

European Habitats and Species Directive (CEC, 1992)
The main aim of the Habitats Directive is to promote the maintenance of biodiversity by requiring Member States to take measures to maintain or restore natural habitats and wild species listed on the Annexes to the Directive at a favourable conservation status, introducing robust protection for those habitats and species of European importance.

European Red Data lists (IUCN, 2000)
International Union for Conservation of Nature (IUCN and the European Commission have been working together on an initiative to assess around 6,000 European species according to IUCN regional Red Listing Guidelines. Through this process they have produced a European Red List identifying those species which are threatened with extinction at the European level so that appropriate conservation action can be taken to improve their status.

European Council Birds Directive (CEC, 1979)
The Directive provides a framework for the conservation and management of, and human interactions with, wild birds in Europe. An important part of this Directive is the identification and classification of Special Protected Areas (SPAs) to protected vulnerable bird species listed in Annex 1 of the Directive and regularly occurring migrating species.

The Wildlife and Countryside Act (WCA) 1981 (as amended)
This Act is the primary legislation that protects animals, plants and certain habitats in the UK.

The Conservation of Habitats and Species Regulations 2017
The Conservation of Habitats and Species Regulations 2017 consolidate and update the Conservation of Habitats and Species Regulations 2010, and transpose Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora ("the Habitats Directive") and elements of Directive 2009/147/EC on the conservation of wild birds ("the Birds Directive") in England, Wales, and to limited extent, Scotland and Northern Ireland.

The objectives of the Habitats Directive is to protect biodiversity through the conservation of natural habitats and species of wild fauna and flora. The Directive lays down rules for the protection, management and exploitation of such habitats and species.

The Regulations place a duty on the Secretary of State to propose a list of sites which are important for either habitats or species. These sites form a network termed Natura 2000 and include Special Areas of Conservation and Special Protection Areas.

Protection of Badgers Act 1992
The Protection of Badgers Act 1992 consolidated and improved previous legislation. Under the Act it is an offence to kill, injure or take a Badger, or to damage or interfere with a sett used by a Badger unless a licence is obtained from a statutory authority.

The Hedgerow Regulations 1997

The Hedgerows Regulations 1997 protect certain hedgerows from being removed (uprooted or destroyed) if they meet certain criteria.

The Countryside and Rights of Way (CRoW) Act 2000
This Act increases measures for the management and protection for Sites of Special Scientific Interest (SSSI) and strengthens wildlife enforcement legislation.

Circular 06/2005 Biodiversity and geological conservation – statutory obligations and their impact within the planning system
This circular provides administrative guidance on the application of the law relating to planning and nature conservation as it applies in England. It complements the national planning policy in the National Planning Policy Framework and the Planning Practice Guidance.

Natural Environment and Rural Communities Act 2006
The Act made amendments to the both the Wildlife and Countryside Act 1981 and the Countryside and Rights of Way (CROW) Act 2000. For example, it extended the CROW biodiversity duty to public bodies and statutory undertakers.

UK Post-2010 Biodiversity Framework, 2012
The 'UK Post-2010 Biodiversity Framework', published in July 2012, succeeds the UK BAP and 'Conserving Biodiversity – the UK Approach', and is the result of a change in strategic thinking.

National Planning Policy Framework, 2019
The National Planning Policy Framework sets out the Government's planning policies for England and how these are expected to be applied. It contains a number of policies relating to ecology including "minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures".

The natural choice: securing the value of nature (2011) (Natural Environment White Paper)
This White Paper outlines the Governments vision for the future of landscape and ecosystem services.

Biodiversity 2020
This is a national strategy for England's wildlife and ecosystem services based on the White Paper.

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