

CENTRAL PARK AREA ACTION PLAN DEVELOPMENT PLAN DOCUMENT

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Applying the Tests of Soundness set out in paragraphs 4.24 and 4.25 of the Government's Planning Policy Statement 12 (November 2005) I submit that the Central Park Area Action Plan DPD shows poor judgement and is therefore seriously flawed with regard to the following:

A. TEST 3 SUSTAINABILITY APPRAISAL APPLIED TO POLICY / PROPOSAL CP6 - PENNYCOMEQUICK

1. The sale of open space parkland for housing development fails on economic, environmental and social grounds. Located in a dense urban area Central Park's green space is a precious finite asset and once any part is squandered on inappropriate development it is:
 - a) permanently lost to the public for air and exercise;
 - b) tantamount to selling the family silver for short-term financial gain, thereby disregarding the land's priceless long-term intrinsic value.
2. There is an important principle at stake and ^hte reduction in the proposed scale of house building from 150 / 200 to 40, although welcome, does not make the matter right. Moreover, it is immaterial as to whether the houses would be low cost or not.
3. Residential development would set a precedent for further building within the park. This weakness in the plan has been correctly identified in SEA/SA of Preferred Options for Central Park Area Action Plan Vol 2 prepared for Plymouth City Council by Land Use Consultants, October 2006.
4. It is instructive to compare the indifferent attitude shown towards open space by Plymouth's planners in recent decades with that of the 1943 Paton ~~watson~~/Abercrombie Plan for Plymouth. These distinguished authors in recognising the importance of Central Park as the prime area of public open space in the city went as far as to recommend that the 5 rows of houses off Alma Road should ultimately be demolished and the roof of the old Royal Mail sorting office made flat so as not to interfere with the northerly open view from the railway station. (SEE APPENDIX A)
5. The poorly informed policy of attempting to flog Central Park green space for

house building is, of course, totally at odds with the spirit, aims and recommendations of the 2002, 90page Department for Transport, Local Government and Regions final report of the Urban Green Spaces Taskforce entitled "Green Spaces, Better Places".

- B. TEST 3 SUSTAINABILITY APPRAISAL APPLIED TO POLICIES / PROPOSALS CP1 (LIFE CENTRE AND CP2 (HOME PARK)
TEST 7 STRATEGIES / POLICIES / ALLOCATIONS THAT REPRESENT THE MOST APPROPRIATE IN ALL CIRCUMSTANCES APPLIED TO POLICIES / PROPOSALS CP1 (LIFE CENTRE) AND CP2 (HOME PARK)
6. The development zone / footprint is much too profligate of valuable open space. This weakness has been properly identified by Land Use Consultants* retained by the City Council, when noting that the proposal would entail a larger overall footprint resulting in loss of open space and negative aspects on biodiversity. Moreover, these consultants recognise that high quality open space is as important, if not more important, than creating new sporting facilities.
(* See: SEA/SA of Preferred Options for Central Park Area Action Plan Vol 2)
 7. Additional to its value for informal and formal outdoor recreation, the aesthetic importance of open space in breaking up the continuity of the built-up urban mass cannot be overstressed. We see how this function has already broken down with incremental development of the existing Swimming Pool and Mayflower Sports Centre together with their associated infrastructure (access roads and car parks). The Proposed CP1 development especially, would constitute a vastly larger-scale intrusion of the built environment within the park.
 8. The ^cscale of development does not fit with the location. The Life Centre Complex particularly ("a highly visible-----landscape building") would be a much too dominant feature in the Milehouse/Outland Road locality with concomitant enhanced traffic problems affecting residents in addition to the negative impact of traffic/car parking on land within the park boundary that should, for safety and other compelling reasons, be a traffic - free zone.
 9. It is evident that the financial/business case is driving the proposed CP1 and CP2 to a level of development that is inconsistent with the park's primary function. The footprint and level of intrusion would be immense because it is perceived that the replacement and upgrading of the swimming and other indoor sporting facilities constitute a less prosperous scheme without extraneous add ons. Plainly, there is far too much enabling development to help fund the project. Given that the threatened area is less than pristine through degradation arising from the present structures, it is one matter to provide some good

replacement indoor sport facilities, but it is utterly unacceptable to import supplementary window dressing to bolster the financial viability of the enterprise. Although modified somewhat since the preferred option stage (eg by deletion of the cinema - an altogether inappropriate idea for such a location) the development zone/footprint is much too extensive in taking up valued open space. Most if not all of these package fillers are either unnecessary or could stand alone and thus go elsewhere in the city. I suggest that in the interest of protecting as much as possible of the open space integrity of the park, the following items of excess baggage need discarding: environment centre, plant sales, health facilities including "wellness space", ice rink, event storage facilities, creche, aerobic dance studio, meeting and ancillary rooms, dance training and rehearsal centre, community recording studios, hotel, conference and exhibition space, etc.

10. Lest any argument about the built core be invoked to support, for instance, the hotel or conference and exhibition space, the mere fact that part of the Home Park area has an asphalt surface should not be allowed to influence a decision in favour of developments out of keeping with the Park's primary function.
11. I am convinced that the public spirited City Council that took action (following the Bath and West Show in 1922) to purchase the area of Central Park as parkland by means of a Corporation Bill put through Parliament never intended unsympathetic, intrusive, incremental developments of the kind that have occurred or of the even more incongruous type that are proposed. These have been instigated by a vocal local authority faction with acquisitive eyes ever focussed on the park's open space for whom unchecked urban sprawl is absolutely fine. This mentality would never be satisfied until all the green space has been covered by concrete, glass and brick boxes. If stand alone facilities are genuinely required, planners must be encouraged to comb through other areas within the city boundary for suitable sites.
12. The CP1 and CP2 proposals are inconsistent with Government guidance on the the protection of green spaces in that they conflict with key recommendations of the 2002, Department for Transport, Local Government and Regions final report of the Urban Green Spaces Taskforce entitled "Green Spaces, Better Places". Recommendations of particular relevance are:
 - No 39 The Government should promote the strategic importance of parks and green spaces in improving the quality of urban life and urban environments by ensuring their provision, protection and enhancement are key objectives in planning policy guidance or the proposed series of planning policy statements (PPSs). (SEE APPENDIX B)

No 40 That the Government should ensure that revised Planning Policy Guidance note 17: Sports, Recreation and Open Space (or new PPS) provides clear guidance on:

- 1) the importance of strategic green space planning in developing and enhancing networks of urban green spaces;
- 2) protecting urban green spaces from development, especially incremental development in areas where local schools, people and communities need them; (SEE APPENDIX B)

13. The proposals also conflict with the Council of Europe Recommendation No R(86) 11 of the Committee of Ministers to Member States on Urban Open Space (Adopted on 12 September 1986). Specifically, the current Central Park proposals trample on commitment to:

2. Take steps to ensure that the securing, provision and management of open space are an integral part of urban development and in particular:
 - 2.1 To ensure that open space is adequately secured and protected; (SEE APPENDIX C)

From:

J. PATON WATSON & P. ABERCROMBIE — A PLAN FOR PLYMOUTH (1943)

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Rotunda, and something in the nature of a stadium could be placed here. The station from the Great Western Passenger Dock would bring visitors direct into this centre, and a drive would bring them either to the Barbican end of the Old City or under a bridge into the Civic Centre: both roads would pass under the walls of the Citadel.

The other gateways to the City Centre are, of course, by Road, Railway and Air. Plymouth has the opportunity for one of the finest railway stations and entrances in the Kingdom. Raised aloft on its embankment, the arriving passenger sees to the north the rising slope of Central Park, with its green skyline still awaiting its landscape treatment, with probably a silhouette of trees. Nothing should be allowed to interfere with this northerly open view. The five rows of houses off Alma Road should ultimately be demolished, and the roof of the post-office sorting office made flat. Southwards, the station, rebuilt on its present diagonal frontage, will face an enclosed space whose levels will require very careful handling, but can produce very striking results. In place of the vast open level expanse of the northern continental station forecourt or place, we propose a highly modelled enclosure planted with palms: for Plymouth is a southern town. There will, of course, be ample provision for circulation and parking places for buses and taxis. The station hotel on its higher terrace encloses this station courtyard.

Outside, we have permitted ourselves the one monumental feature of the whole of Plymouth rebuilding—a great view seen from the forecourt entrance, across the Shopping and Civic Centre, to the Naval War Memorial on the Hoe. The station at Plymouth is a long way off, and at present there is no indication to the arriver where the town centre or sea front lies: Brighton suffers from this same disadvantage. The vista itself is to be the visitor's guide, and it will, literally, in itself cost nothing; it is merely a gap left between buildings. It is to be no road or traffic approach, and its enrichment by stairs, terraces, *tapis verts*, or other features of the landscape architect's and gardener's art can be left for gradual realization. It often happens that the simplest treatment is the most effective, and here the ends of the buildings springing from different ground levels and of varying heights and distance apart would, of themselves, produce a series of enclosing screens (as described by the old writers on landscape) containing the space until the openness of the Hoe were reached either on foot or by the carriage.

Railway
Entrance