Appendix E
City Centre and University AAP Issues and Preferred Options document
Sustainability Appraisal
Equality Impact Assessment
Consultation response form
Sustainability response form
city centre and university area action plan 2006-2021

issues and preferred options consultation

november 2008

plymouth city council
department of development
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1 What is the City Centre and University AAP?

1.1 Plymouth City Council is producing an Area Action Plan (AAP) for the City Centre and University area. Its purpose is to set out a strategy with proposals for the regeneration of Plymouth’s City Centre. When adopted, it will form part of Plymouth’s Local Development Framework.

1.2 This consultation document discusses the key issues which the AAP must address and the ways in which this could be done. It then goes on to define the key ingredients that will be used to formulate the plan. This is your opportunity to tell us about anything we have missed, or got wrong, and whether you think we are on the ‘right track’ in terms of preparing the final plan.

What is the Local Development Framework?

1.3 Plymouth’s LDF provides a strategic planning framework for the city, guiding change to 2021 and beyond. The LDF, together with the Regional Spatial Strategy, forms the statutory Development Plan for the City. Several parts of the LDF have been adopted, including the Core Strategy which was adopted in April 2007.

1.4 The Plymouth Local Development Scheme (LDS) sets out more information on the various LDF documents, their current status and the timetable for producing those that are not already adopted.

1.5 The City Centre and University AAP will provide one more piece of the jigsaw in terms of the City’s plans to improve Plymouth’s Waterfront Regeneration Areas – from Devonport to the East End.

Why produce this document?

1.6 The City Centre and University Area Action Plan is the first AAP to be progressed using the new Local Development Framework Regulations which came into force June 2008. These regulations removed the requirement for a ‘Preferred Options’ consultation stage, and effectively set out that Local Authorities should engage with stakeholders, the public and other organisations as appropriate to the subject matter of the LDF document. The new regulations have therefore simplified the process of producing a Development Plan Document.

1.7 The process of producing the City Centre and University AAP was started in 2005 with an Issues and Options Report. This new Consultation Document achieves two things:

- It ‘refreshes’ the Issues and Options process by re-capping on some information that has been set out before and finalises the list of key issues which the AAP must address,
- It sets a milestone in the process of producing the AAP by checking with the public and other stakeholders that we have correctly analysed the key issues. It then moves the process on to the development of the Strategy for the City
Centre by setting out the ‘key ingredients’ which we believe should form the basis for preparing the Strategy, and asking for views on these.

How can you get involved?

1.8 We are publishing this consultation document for a six week consultation period. During this time we are asking people, stakeholders and organisations to let us know what they think about the issues, options and preferred strategy set out in this document, or any other comments or thoughts about the City Centre that they think we should know about and which could influence the development of the AAP. The period for making comments is from Monday 3rd November to Monday 15th December 2008.

1.9 Representations can be made electronically using the Council’s website or in writing using the official form (available on the Council’s website at www.plymouth.gov.uk/ldf, or paper copies at the Civic Centre, local libraries and local housing offices). We will also be holding a number of consultation events around the City Centre during the consultation period – details available on the Council’s website and in local press.

What happens next?

1.10 During 2009 we will be continuing to develop the City Centre Strategy and the proposals which will deliver the Strategy. The responses we receive as part of this consultation will be an important source of information which we will use as part of this work. There may also be further opportunities to get involved with the production of the AAP throughout this time.

1.11 By summer 2009 we will have produced a complete draft of the AAP. This document will be made available for a statutory six-week consultation period, during which formal representations can be made on the “soundness” of the AAP. Following this period, we will consider the representations and assuming this does not mean a major revision of the document, we will formally submit the AAP to the Secretary of State.

1.12 All representations received during the final consultation period will be considered at an Independent Examination conducted by a Planning Inspector. The Inspector will test the ‘soundness’ of the AAP and produce a report setting out what changes (if any) are required. The Inspector’s report will be binding on the Council.

1.13 Full details of the process of producing an Area Action Plan can be found in the Council’s Statement of Community Involvement. The timetable for producing the City Centre and University Area Action Plan can be found in the Local Development Scheme. Both of these documents are available at www.plymouth.gov.uk or can be obtained by contacting the Development Planning Unit at: Civic Centre, Plymouth, PL1 2AA (tel. 01752 305477).


2 The Context and The Vision

Where have we come from and where are we now?

2.1 Plymouth City Centre is an example of the post war rebuilding of a city. The historic centre of Plymouth was largely destroyed by bombing in the Second World War. Following the bombing, an ambitious scheme was drawn up to rebuild the centre using a Beaux-Arts street grid. This became the 1943 Plan for Plymouth developed by Abercrombie and Watson.

2.2 The implementation of this plan commenced immediately after the war and continued until about 1962. In 1987 the City Council adopted the Plymouth Local Plan which set out a set of proposals to revitalise the City Centre. The First Alteration to this Local Plan was adopted in 1996 and continued to identify redevelopment areas in the City Centre. The revision to the 1996 Plan was published as a First Deposit Local Plan in 2001, but the process of producing this plan was halted in 2004 when the Local Development Framework was started.

2.3 The City Centre and University AAP is the key part of the LDF which will focus attention on the future of the City Centre. It will build on the history of Plans for the centre, but will also take account of new work which has been done as part of the LDF process.

2.4 The City Centre in 2008 has a reasonable shopping offer, but has underperformed over the last few decades. Although numerical representation by the multiple retailers is reasonably strong, it has not witnessed the same degree of growth in this sector compared to other major centres in the UK. Furthermore, many of the stores are small in comparison to new stores in other regional and subregional centres. This is reflected in its decline in the national retail rankings from approximately 20th in the 1960’s consistently through to the mid 1990’s, where by 1995 it had fallen to 36th. Overall, the City has witnessed quite limited expansion over the last 40 years, mainly through the recent completion of the Drakes Circus shopping centre (50,000 sqm opened 2006) and, prior to that, the far smaller Armada Centre (10,000 sqm which opened 1986). That represents some 1500 sqm per annum during this period, the equivalent to between 3 and 5 modern shops units per year.

The 'Mackay Vision'

2.5 A key piece of work which sets out a new approach to Plymouth’s future and in particular the City Centre was the “City Centre Precinct Urban Design Framework”, produced in 2002 by the City Council. This study set out a range of ideas for regenerating the City Centre. The study was followed in 2004 by the Vision for Plymouth, published by MBM Arquitectes and A-Z Urban Studio. The Vision (often called the “Mackay Vision”) saw Plymouth’s potential to become ‘One of Europe's finest waterfront cities’, and set out key principles for an attractive city with a thriving and vibrant City Centre. At the same time, the development of the new Drakes Circus Shopping Centre, representing the first new major commercial retail development in the City Centre for about 20 years, promised to open up a new dimension to the City.
Centre's shopping appeal. The LDF and this AAP are now developing the Mackay Vision, providing the framework to deliver a City Centre which drives forward the regeneration of Plymouth and is a showpiece for the renaissance of the City.

What Mackay saw...

2.6 Mackay looked at Plymouth’s location, its hinterland and its history and saw the potential to regenerate the City to create one of Europe’s finest waterfront cities by 2021. The Vision saw the City Centre as the key part of the renewal, but recognised that there were several issues to address:

- The post war regeneration had focused the City Centre on the two boulevards of Royal Parade and Armada Way, and envisaging a grand boulevard between the station and the Hoe. This was never fully realised, with the result that the City Centre has no clear links to the waterfront areas at Millbay and Sutton Harbour/The Barbican, and an unclear relationship to the Hoe.
- By focusing on retailing as the main role of the City Centre, Abercrombie’s plan had provided very few opportunities for people to live in the City Centre, or for many leisure activities and uses to take place in the Centre. The Plan adopted a zoning approach which encouraged large areas devoted to one use. ‘The impact of this zoning approach is clearly evident in the empty and quiet City Centre streets outside of shopping hours, devoid of any leisure or service functions’.¹
- The implementation of the Abercrombie Plan resulted in a variable mix of design and build quality across the City Centre. Subsequent developments have sometimes been of poor design and quality leading to the City Centre having a poor image and reputation, and feeling particularly run down in places.

2.7 Despite these issues, Mackay saw a massive opportunity to renew the City Centre so that it would contain a thriving and diverse mix of activities, underpinned by successful retailing but including places for people to live, work and for leisure activities. He also envisaged it physically and functionally connected to neighbouring areas and crucially to the waterfront. This Vision would be based on invigorating the Abercrombie Plan to create ‘Plymouth’s Downtown’, and ensuring that the City has “a past with a future”. The Vision would be framed around the following principles:

- A ‘released’ City Centre – concentrating on the management of traffic movements around the centre and a greening of the ring road, and shared space so that there is less separation between the car and pedestrians.
- A ‘connected’ City Centre – improving pedestrian movement across and into the centre, with clear connections to the waterfront and the Hoe. Developments on the edge of the centre creating links and relationships with neighbouring areas.

¹ from the ‘Vision for Plymouth’
2. The Context and The Vision

- A ‘diversified’ City Centre – Locating a greater diversity of uses in the centre, providing opportunities for living, working and leisure. Encouraging tall buildings which frame the streets with more retailing providing more intensity.
- A ‘defined’ City Centre - ‘the city centre is no longer defined by its isolation and retail use – it is defined by its varied architecture that exploits the rigidity of the grid – its tall buildings with upper floors providing stunning views of the city and water – its grand gateways from both water and land’.

2.8 Mackay did, however, make a key point: ‘Providing the right conditions and opportunities for occupiers to choose the City Centre rather than out of town locations will be a key hurdle to overcome in the process of regenerating the heart of the City.’

Interpreting Mackay - The Core Strategy Vision

2.9 The Plymouth LDF Core Strategy was adopted in 2007. As the development plan for the City, it puts in place planning policy to guide the development and growth of Plymouth up to and beyond 2021.

2.10 The aims of the Core Strategy are developed from Mackay’s Vision for Plymouth. The Plan shows how the Vision will be delivered in the City and sets out a more detailed set of aims and objectives to guide growth.
The Core Strategy provides a detailed Vision Statement and Diagram for the City Centre, as set out below:

**Area Vision 3 - Plymouth City Centre**

To reinforce the City Centre’s role as a vibrant and thriving regional destination, providing high quality shopping, recreation, culture, civic, education and commercial facilities, well connected to surrounding neighbourhoods, as well as being a safe place of quality in which to live.

The Council’s objectives to deliver this vision are:

1. To diversify the current functions of the City Centre to give it more life outside shopping hours, including intensification of residential, office, and cultural uses, including, where appropriate, the introduction of tall buildings.

2. To significantly intensify the central area to include taller buildings at key locations, and offer visitors and residents a 24-hour life.

3. To identify a central office core within the City Centre in conjunction with the redevelopment of Millbay.

4. To provide some quieter areas with enough activity at all times to make it feel safe.

5. To attract specialised shops, pubs, entertainment and culture.

6. To ensure connections with adjacent areas are strong, direct and meaningful.

7. To positively integrate and reinforce the role of the University and the Cultural Quarter as vibrant and strong parts of the City Centre.

8. To create a more urban environment in the University area through developments which give a better sense of enclosure to the streets.

9. To enrich the quality of the environment in the City Centre, so that the public areas are clean, safe, accessible and attractive.

10. To seek opportunities to create better pedestrian permeability north south through the City Centre blocks and ensure that new developments seek to improve the legibility of the City Centre so that everyone can easily find their way around.

11. To consider the heritage value of the City Centre and University areas as part of its regeneration.

12. To selectively introduce traffic back into parts of the City Centre.
2.12 This Vision picks up on Mackay's key themes by aiming to:

- Diversify the City Centre uses to give more life outside shopping hours,
- Intensify the Central Area and introduce variety, quieter areas, enrichment of the environment and improvements to the quality of the public realm, including the introduction of tall buildings,
- Improve connections to neighbouring areas and pedestrian permeability within the centre.

Sustainable Communities

2.13 The 'golden thread' which runs through the Core Strategy is the principle that all growth and development in the City should contribute to the creation of sustainable communities. This is clearly set out in Strategic Objective 3 and Policy CS01 of the Core Strategy. This principle applies equally to all Plymouth's communities, including the City Centre.

2.14 However, in the context of the City Centre, the picture becomes more complicated. The City Centre provides services on a range of levels:

- local facilities for those people living close to and in the centre itself,
- strategic shopping, employment and leisure facilities for people living in Plymouth,
- sub-regional and regional level shopping and leisure opportunities for people living in the wider catchment area and beyond.

2.15 Changes to the City Centre therefore must create sustainable characteristics for both the city as a whole, as well as the communities living within the area.

2.16 Thus, it is clear that a successful and vibrant City Centre will provide the range of facilities and services that will allow it to act as the hub for Plymouth's communities. However, the AAP should not lose sight of the smaller scale community needs and services required by people living near to the City Centre, and of the people who will be living in the City Centre in the future. The AAP should also address the needs of these people to have access to open space, to quality spaces and places, to facilities which provide a community focus, and to a transport system which addresses their needs as well as the needs of visitors to the City Centre. Given the amount of development which could take place in the City Centre, there is also the potential to plan for the very highest sustainable building standards, including combined heat and power generation and re-use of materials.

So what is left for the AAP to do?

2.17 The Core Strategy is adopted and so the overall framework for the City Centre has been set. The Area Action Plan must now deliver the Vision set out in the Core Strategy.

- City Centre renewal should be underpinned by significant retail led development. Up to 172,000 sq m of new retail floorspace should be provided in the City by
2021, the majority of which should be in the City Centre. By comparison, Drakes Circus provides 50,000 sq m of floorspace.

- The renewal strategy should make provision for significant amounts of new dwellings and new offices – no targets are set for these uses.
- The renewal of the City Centre must include the mixed-use intensification and enhancement of the University, Plymouth College of Art and Design (PCAD), North Hill “Cultural Quarter” and railway station, and improved connections to Millbay, Stonehouse, The Hoe, Sutton Harbour and the Barbican and Central Park.
- A strategy should also be put in place to provide high quality public realm across the City Centre.

2.18 The key tasks of the AAP are therefore:

- To set out proposals which will diversify activity in the City Centre.
- To identify opportunities to increase the number of homes in the City Centre.
- To identify the key opportunity sites in the City Centre.
- To set out a strategy for key City Centre blocks.
- To set out a strategy for the conservation of the most important elements of the historic environment which is also consistent with the renewal strategy.
- To set out a transport strategy which enables the delivery of the renewal strategy.
- To set out a comprehensive and flexible delivery strategy based on sound commercial investment principles, which provides the right opportunities and conditions for investors and occupiers to choose Plymouth City Centre and make the renewal happen.
3 Do we understand the Key Issues facing the City Centre?

Did we get the 'Issues and Options' right?

3.1 The process of producing a City Centre Area Action Plan was formally started in 2005 with the publication of an Issues and Options pamphlet. It developed the key issues flagged up by Mackay and asked if any other issues should be considered. It also set out a detailed Vision and a set of key matters which attempted to bring together all the issues as they were understood.

3.2 A number of comments were received in response to the Issues and Options consultation. These are discussed in the “Summary Report of Responses to City Centre and University Area Action Plan Issues and Options consultation”. No completely new issues were raised, although comments were made emphasising:

- the need for sufficient car parking.
- the amount of crime and disturbance which could result from a ‘24 hour economy’.
- the need to acknowledge the economic importance of the City Centre.
- the need for modern retail facilities.
- the need to protect the historic environment.
- the need to ensure that redevelopment of Colin Campbell Court does not have a negative impact on the Pannier Market.
- the need to provide some covered areas in the City Centre.

The Key Issues

3.3 Since 2005 the Council has been collecting a lot of detailed new evidence in order to fully understand the issues which must be addressed by the AAP. We now think we have a full understanding of the key issues and how they affect the City Centre. We also understand that these issues must be resolved by the AAP if the City Centre renewal is to succeed. The information underpinning these issues is set out in detail in the supporting Evidence Base documents (see Chapter 8), and although these are still being added to, the issues themselves are summarised below:

Structural problems

3.4 These problems have been analysed and discussed in detail in the City Centre Investment and Development Strategy, which was prepared by consultants for the Plymouth City Centre Company and Plymouth City Council. The Strategy has identified some serious issues in the City Centre which, if not addressed threaten its commercial future:

3.5 Size of the City Centre
The geographical extent of the City Centre is far larger than would be expected for a city the size of Plymouth (see Fig 1).
3.6 The footprint of the City Centre is as large as Manchester or Liverpool City Centre, but without the catchment size which supports those cities. Liverpool and Manchester City Centres are more intensely developed and therefore have more attractions for visitors within them, but this means that there is more on offer to encourage people to visit and to shop in the centres. In Plymouth, the size of the centre and the range of attractions on offer means that there is little incentive for people to walk across the whole area. Put simply, the distance from Drakes Circus to Western Approach at Frankfort Gate is nearly 1 km, and there is little incentive for shoppers to make that journey. This is the reason why some of the peripheral parts of the City Centre are in decline.

3.7 Poor anchor store distribution
Anchor Stores are usually the large, well known department stores which attract people to shopping centres. They are important because they are the main destinations for shoppers, and so they attract people who will then visit other shops. The distribution of anchor stores is crucial to the health of a centre, because as people walk between one anchor store and another, they pass and have the opportunity to use other, smaller shops. It is important for the health of the City Centre that people pass as many other shops as possible and therefore have the opportunity to use those shops. Shops that people have to walk past as they move between anchor stores can be described as 'well anchored'.
3.8 The City Centre has a reasonably good number of anchor stores – House of Fraser (Dingles), Debenhams, and Marks and Spencer are represented, Drakes Circus is anchored by Next and Primark at one end of the mall, and Marks & Spencer at the other, and Derry’s acts as a secondary anchor to the west of Armada Way. The anchor stores are, however, poorly distributed. All except Derry's are clustered to the east of Armada Way on New George Street or in Armada Way. The result is that over 80% of shop units in the City Centre are poorly anchored or have no relationship to an anchor store, including virtually all of the West End (see Table 1). These areas are especially vulnerable to decline, particularly since the opening of Drakes Circus.

<table>
<thead>
<tr>
<th>From - To</th>
<th>No of Shops</th>
</tr>
</thead>
<tbody>
<tr>
<td>M&amp;S - Debenhams</td>
<td>16</td>
</tr>
<tr>
<td>House of Fraser - Debenhams</td>
<td>16</td>
</tr>
<tr>
<td>House of Fraser – M&amp;S</td>
<td>33</td>
</tr>
<tr>
<td>House of Fraser - Coop</td>
<td>26</td>
</tr>
<tr>
<td>M&amp;S - BHS</td>
<td>24</td>
</tr>
</tbody>
</table>

Table 1: Number of Shops Between Anchor Stores in Plymouth City Centre (source: “Future Direction and Investment Strategy”, Cushman and Wakefield 2008)

NB – Only 15% of shops are located between primary anchors, only 25% of shops are located between recognised anchors. 75% of shop units are therefore poorly anchored.

3.9 Unit Sizes that do not meet the requirements of modern City Centre retailers. The retail units in the City Centre were mostly created when the City Centre blocks were set out by the Abercrombie Plan. They are therefore over 50 years old and despite internal alterations and units being combined, they are substantially smaller than units being demanded by modern retailers looking for opportunities to trade in Plymouth City Centre. Table 2 compares average unit dimensions in Plymouth with average modern requirements.

<table>
<thead>
<tr>
<th></th>
<th>No of Units</th>
<th>Average Depth (feet)</th>
<th>Average Width (feet)</th>
<th>Average footprint (sq ft)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Prime</td>
<td>50</td>
<td>80 (60%)*</td>
<td>24 (80%)*</td>
<td>1920 (50%)*</td>
</tr>
<tr>
<td>Good Secondary</td>
<td>32</td>
<td>84.5 (65%)*</td>
<td>28 (90%)*</td>
<td>2366 (60%)*</td>
</tr>
</tbody>
</table>
Do we understand the Key Issues facing the City Centre?

### Table 2: Existing Retail Stock vs Modern Market Requirements (source: “Future Direction and Investment Strategy”, Cushman and Wakefield 2008)

<table>
<thead>
<tr>
<th>Type</th>
<th>No of Units</th>
<th>Average Depth (feet)</th>
<th>Average Width (feet)</th>
<th>Average footprint (sq ft)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Secondary</td>
<td>68</td>
<td>77 (60%)*</td>
<td>29 (90%)*</td>
<td>2233 (56%)*</td>
</tr>
<tr>
<td>Tertiary</td>
<td>297</td>
<td>45 (35%)*</td>
<td>20 (65%)*</td>
<td>900 (23%)*</td>
</tr>
<tr>
<td>Modern Units</td>
<td>120 - 140</td>
<td>30 - 32</td>
<td>3600 - 4200</td>
<td></td>
</tr>
</tbody>
</table>

* = percentage of modern unit demand

3.10 The implication of this issue is that even if large multiple chain retailers were keen to locate in the City Centre, they would be unable to find units which would enable them to trade to their optimum potential. The AAP therefore faces a double challenge: to create units which appeal to modern retailers, and to predict what kinds and sizes of units will be required by retailers when any renewal plan is implemented.

3.11 It is also important that the AAP provides for high-quality smaller retail units for locally distinctive and niche retailers, including those that already contribute positively to the character of key parts of the City Centre, including the “West End” for which a Vision document “Awakening the West End: 20 Projects in 20 Years” has been produced by Plymouth City Centre Company. The vision is for the West End to become the ‘Covent Garden of the West’ - the cross roads of city life in Plymouth, characterised by a network of streets, lanes and plazas and with a reputation for its independent niche shops, cultural activities, bars and restaurants, with the Pannier Market a centre for high-quality local produce.

3.12 The quality of some existing buildings is low
Some City Centre blocks are now over 50 years old, and although some were built at a high quality others were much lower quality. Some of these buildings are now in need of repair and upgrading. This causes more problems, as their general condition is another disincentive to modern retailers attempting to locate in the City Centre.

3.13 A key implication of this is that in the absence of a mechanism to bring the buildings back to a reasonable standard, they are likely to become worse, exacerbating the problem.

3.14 Low intensity of uses
The final issue identified reflects Mackay's thoughts regarding diversity of uses and 'urban character'. The City Centre, with its low rise buildings and concentration of retail uses, has a low intensity of activity compared to other City Centres. Development is also very low density, as a result of the post war pattern of development which laid out large courtyards at the centre of the City Centre blocks,
which are largely used for servicing and car parking. This lack of activity outside of business hours contributes to the area feeling unsafe and allows opportunity for antisocial behaviour - reducing the attraction of the City Centre to visitors, and therefore reducing its attraction to investors. The low density of development does, however, present opportunities for the intensification and renewal of parts of the City Centre.

Retail capacity estimates

3.15 The retail capacity upon which the retail strategy in the Core Strategy and the AAP is based is set out in Table 3:

<table>
<thead>
<tr>
<th>Forecast Year</th>
<th>Capacity Estimate (£)</th>
<th>Implied net Floorspace</th>
<th>Implied gross Floorspace</th>
</tr>
</thead>
<tbody>
<tr>
<td>2011</td>
<td>37.44m</td>
<td>5,348 sq m</td>
<td>7,640 sq m</td>
</tr>
<tr>
<td>2016</td>
<td>232.7m</td>
<td>30,907 sq m</td>
<td>44,153 sq m</td>
</tr>
<tr>
<td>2021</td>
<td>543.52m</td>
<td>66,936 sq m</td>
<td>95,623 sq m</td>
</tr>
<tr>
<td>2026</td>
<td>964.64m</td>
<td>110,307 sq m</td>
<td>157,582 sq m</td>
</tr>
</tbody>
</table>

Table 3: Plymouth City Centre Forecast Retail Capacity and Floorspace Implications

3.16 These figures have been produced and verified by the Plymouth Shopping Study 2006 and the City Centre Investment and Development Strategy. They show that there is sufficient retail capacity and need in the Plymouth catchment to support the amount of floorspace which the Core Strategy says should be provided in the City by 2021. It should, however, be noted that the retail capacity is based on an expectation that the estimates of population growth and economic growth set out in the Vision for Plymouth, the Sustainable Community Strategy and the Core Strategy are delivered. If these estimates do not occur by 2021, the retail capacity may not materialise as predicted. This may indicate that the Plymouth Growth Agenda is not on track, in which case the Council would need to monitor growth levels and possibly adjust the timescales over which the Vision is delivered.

Historic environment priorities

3.17 The City Centre’s historic environment has been the subject of several studies, for example by Jeremy Gould (Plymouth Planned: The Architecture of the Plan for Plymouth 1943-1962) which includes an assessment of the architectural quality of City Centre buildings. This information was incorporated into the adopted City Centre Precinct Urban Design Framework (2002). Further studies of the City Centre’s historic environment are included in Alan Baxter Associates’ Plymouth Waterfront Characterisation Study (2006) and in the City Centre Investment and Development
Strategy. Mackay also made references to the quality of the City Centre buildings and the weight which should be placed on various aspects of the historic environment, in order to ensure that the City has 'a past with a future'. In particular, Mackay indicated that:

3.18 'Watson and Abercrombie’s plan for the city centre is, to use a rather hackneyed phrase, the “jewel of the crown” of modern English town planning. It must be conserved, not as a fossil but rather alive to the present circumstances and shift in cultural values. In other words, we must identify its soft or weak parts, where we can act, and readjust to balance the poles of attraction where people will want to go. The significance of this opportunity should not be constrained by protectionist policies – it is the nature of the grid structure that must be respected and responded to…’

3.19 Mackay recognised the key issues regarding the historic environment that the AAP must resolve:

- It must identify the most valuable and precious aspects of the historic environment in the City Centre.
- It must weigh these aspects against the need for renewal and regeneration which will allow the City Centre to respond to changing retail and commercial issues, and guarantee its future.
- It must set out a policy framework which clearly sets out what should be protected and how it should be protected, and what should be allowed to change and evolve.

3.20 The strategy that is adopted in respect of the historic environment and the balance between protection and change that it sets out will be crucial in determining the shape of the City Centre.

Movement, transport and accessibility

3.21 There are several key transport strategy issues which need to be addressed in the City Centre Strategy. There is a debate to be had over whether these issues could be considered as a constraint to the level of development identified by the Strategy, or whether they should be seen as opportunities to improve and support key aspects of the City Centre. Clearly the issue of how people travel to and move around the City Centre is of key importance to the AAP, but the routes through and around the City Centre are also public spaces whose quality is in some places very low. Mackay recognises this with his view that the ring road should be ‘greened’. The City Centre and University AAP provides the opportunity to not just improve the retail product available and to safeguard and enhance the historic built environment, but also deliver the major transport infrastructure needed to serve both the wider Plymouth resident population and visitors to the area.
3.22 The key principle is the need to recognise the functionality of different parts of the network. The Strategic Transport Network is used by through traffic as well as traffic accessing the City Centre and is shared between car, freight, public transport, pedestrians and cyclists. It will be important for the AAP to identify that part of the network which should be designated as the Strategic Transport Network. A long term view covering the whole of the City Centre for the next 20+ years is required to determine what should be considered strategic.

3.23 The City Centre is accessible to most transport modes and any future development should seek to maintain and improve this accessibility to allow the City Centre to fulfil its economic potential. Some of the key issues are:

- How can safe and convenient pedestrian and cyclist movement to and through the City Centre be encouraged and improved?
- How can a positive ‘sense of arrival’ be created to give a good first impression for people arriving at the City Centre by all modes of transport?
- What can be done to help people find their way around the City Centre.
- The City Centre is the start and end for many public transport journeys and this will increase with the aspirations identified in the Core Strategy. It is the most significant transport interchange in the City with priority afforded to public transport wherever possible. The City Council has a long-term transport objective to provide better public transport through the development of a High Quality Public Transport (HQPT) network on the main transport corridors radiating out of the City Centre. Improvements to City Centre infrastructure and the routes that serve it are critical to meeting this objective. As such the objective to provide HQPT within and to the City Centre, should be at the forefront of any consideration given for development plans within the City Centre and for the AAP itself.
- Walking and cycling are important modes of access to and from the City Centre. Joining up key routes, providing new routes and improving facilities along existing routes will be essential to encouraging increased use of these modes. Making clearly marked routes where sustainable modes are prioritised with safety and security being paramount will be a crucial element of transport provision.
- Most of the existing car parks in the City Centre are not easy to access, are relatively small and are of a very poor quality. Future parking provision should be strategically located so that fewer, larger car parks can be accessed from the strategic road network, and the quality of the car parks should be much improved.
- Plymouth’s strategic road network surrounds the City Centre and is critical in the movement of traffic throughout the wider Plymouth area and not just to and from the City Centre. It is therefore essential to determine the impact development plans will have on the way the highway network operates and from that if there is opportunity to reduce its impact in some places so as to reduce severance, landtake and provide more shared space. It is important to consider the function of the non-strategic road network within the city centre, the access this provides and how this could be improved to make better use of the available space.

Do we understand the Key Issues facing the City Centre?
The existing bus and coach station does not meet the requirements of a modern, dynamic city as aspired to in the City Centre AAP and although sited well the facilities are of a poor standard. The potential to use the existing site for development purposes has been proposed and as such a new station will need to be provided. This new station will need a suitable location for easy access to the attractions and services offered by the City Centre with facilities that meets the City's High Quality Public Transport (HQPT) aspirations.

Plymouth Train Station has already been identified as providing a key development opportunity that could, and should, also serve as an iconic Gateway to the city. The accessibility of the existing station does not meet the needs of many of its users particularly pedestrians and the AAP provides the opportunity to improve how it links with the rest of the City Centre.

It is essential that any plans pay due regard to the need of freight and delivery vehicles to access the City Centre and waterfront areas, particularly the port facilities. This must include maintaining access for wide-load purposes from the City Centre and Waterfront areas to the trunk road network.

Exeter Street is already declared as an Air Quality Management Area (AQMA) and it is anticipated that other parts of the City Centre will be identified as AQMAs in the near future. Future development in the City Centre will have to have regard for AQMAs and put in place measures to help alleviate problems.

**Expansion/Redevelopment outside the Core City Centre**

3.24 Several organisations have their own plans for change outside the City Centre triangle, and there are plans and strategies being worked on covering key locations. All of these need to be reflected in the AAP and integrated into the City Centre Strategy. The plans to renew the City Centre may potentially open up new opportunities for these organisations. The key issues are:

- **The University Masterplan.** The University of Plymouth has been pursuing significant expansion plans for many years, and has been seeking to consolidate its satellite campuses into one central campus. It is within the City Centre AAP area and there is therefore an opportunity to formalise the University’s ambitions within the development plan. In partnership with the University, the Council produced Interim Planning Statement 10, which sets out strategic principles for the University area. The University has since incorporated these principles into its Strategic Development Plan which has been produced by Nicholas Burwell Architects. Key issues for the AAP to explore are improving routes to and through the campus and diversifying the uses on site to make it a safe and vibrant area at all times.

- **Plymouth College of Art and Design (PCAD) and the Cultural Quarter.** PCAD have significant ambitions to enhance and redevelop their site to create a high quality environment that reflects the PCAD’s role and aspirations – a vibrant, inviting educational arts focus within the North Hill ‘Cultural Quarter’. The Council prepared the PCAD Design Framework in partnership with the College to establish positive guidelines for the site’s enhancement and redevelopment.
There may be opportunities to combine with adjacent sites to create a better gateway to the City Centre.

- **Railway Station/North Cross.** There is clearly a need to improve the environment around the Railway Station, the Station itself, and links to the City Centre across North Cross. A North Cross Urban Framework study is being produced by Form Design Group looking at this area.

- **West End Strategy.** The West End is within the City Centre triangle, but there has already been a great deal of work done to develop proposals for change. The West End Strategy ‘Awakening the West End’ was produced for the City Centre Company, and sets out 20 projects over 20 years which are intended to revitalise and transform the West End. The Strategy will need to be integrated into the City Centre AAP.

- **Entertainment Quarter.** Major mixed-use masterplans which have led to several planning applications have been produced for sites south of Derry’s Cross.

### Public realm and urban design issues

#### 3.25 As noted by Mackay, the City Centre Investment and Development Strategy and in the City Centre Precinct Urban Design Framework, the quality of the public realm in the City Centre is poor in many places, and the quality of the buildings in some areas makes the centre seem run down. There are some areas of much higher quality, for example around Drakes Circus and the southern end of Armada Way, but in general the City Centre has a poor environmental image. There is a general lack of high quality green space and play space throughout the City Centre, the buildings have a suburban rather than urban scale and design of buildings over the years has been inconsistent. There is also a great deal of street clutter which distracts from the quality of the public realm.

#### 3.26 Good quality public realm contributes to enjoyable, varied spaces and the creation of a more positive urban environment. It is one of the most tangible ways in which the image of the City Centre can be improved and the experience of visiting the City Centre made more enjoyable. It will therefore also make the City Centre more attractive to investors and retailers, as more people enjoying the City Centre means that there will be more potential shoppers to visit shops.

#### 3.27 The Commission for Architecture and the Built Environment (CABE) have produced research illustrating the economic, social and environmental value of high quality public realm. It has been demonstrated that this provides a range of benefits including higher rental levels, lower maintenance costs, enhanced regeneration and increased public support for development.

### Links to neighbouring areas

#### 3.28 As has been discussed the City Centre has poor links to its neighbouring areas, and is not well related to them. In particular, the centre is badly related to:
3. Do we understand the Key Issues facing the City Centre?

- The Hoe. Although Armada Way extends south of Royal Parade up to the Hoe, there is little to direct visitors to the Hoe and little information for people on why they should continue on to the Hoe.

- Sutton Harbour/The Barbican. Although the historic Sutton Harbour and Barbican is already a key attraction for people visiting Plymouth, there is no clear or direct way for people to walk there from the City Centre.

- Millbay. Although there is nothing at Millbay Docks to attract visitors at the present time, there are plans in the Millbay and Stonehouse AAP and in an outline planning permission for major redevelopment, including a Boulevard running between the docks and the City Centre. This will be a very strong link, but it is important that renewal of the City Centre takes advantage of it. At the present time, the Western Approach/Union Street junction is a major obstacle to movement between the City Centre and Millbay due to its complexity and poor pedestrian links. The Millbay Boulevard will join to Western Approach, and the design of this junction will be key to improving links to Millbay.

- Central Park. The railway station sits at the point where the City Centre and Central Park meet, but there is no direct route to reach the park.

- North Stonehouse. Pedestrians must currently negotiate busy roads, subways and bridges to get to North Stonehouse from City Centre areas.

- The “Cultural Quarter”. The busy ring road creates a barrier to pedestrian and cyclist movement from the City Centre precinct to the University, PCAD, North Hill and Greenbank.

Diversification of uses

3.29 Implicit in many of the above issues is the need to greatly diversify the range of uses in the City Centre. Mackay noted that the post war redevelopment’s dependence on retailing had created a single use City Centre with little activity outside of shopping hours. The AAP should address this through the introduction of residential, leisure and employment based uses which will encourage more activity and interest in the City Centre throughout the day. It also needs to examine closely the quality of existing residential areas in the City Centre.

Key Message

3.30 The set of issues above clearly set out a key message. Doing nothing to address the structural issues which have been identified is not an option. If these issues are not addressed, the City Centre will decline further. The AAP must therefore present a strategy which clearly sets out what will and what will not change, which is progressive and radical, and is flexible enough to be responsive to changing circumstances. Above all, it must deliver.

Have we correctly understood all the issues which the Area Action Plan should address?
4 Scoping out the Options

4.1 This document does not set out a draft Strategy or the draft policies of the final AAP. Instead it will:

- Scope out the range of options for developing a Strategy.
- Set out the main ingredients of a Strategy, with an indication of what the preferred strategy may be.

4.2 The key issues to be addressed in the AAP are set out in the sections above. These issues can be split into two groups:

- Issues which are the key drivers of change and which will affect the overall emphasis of the final strategy. Each of these key drivers raise important concerns which must be addressed and which are key to the future development of the City. However, they also suggest solutions which may conflict with solutions suggested by the other key drivers. The Strategy which is eventually set out in the AAP must successfully balance these key drivers and resolve any conflicts;
- Issues which are the main aspirations for a renewed City Centre and which should therefore be expressed in some form in whatever Strategy is chosen. In many respects these issues are more important than the key drivers, as they must be delivered whatever strategy is eventually formulated.

4.3 The final AAP Strategy must therefore balance the competing pressures and deliver all of the key aspirations.

A Sustainable City Centre Strategy

4.4 Over-arching all of these issues of course, is the ‘Golden Thread’ set out in the Core Strategy that all development should contribute to the creation of sustainable communities. As discussed earlier, a thriving City Centre enhances the sustainability of the City as a whole by focusing activity in the most accessible location in the City. Plymouth City Centre will also be a regionally significant centre, meaning that it will be the main service centre for a very wide catchment in the south west peninsula, and contributing to patterns of sustainable development in the region. All of the options are therefore aiming to create a sustainable strategy for the City Centre and for Plymouth.

4.5 The two groups of issues are:

1. Key drivers of Change - the form of the final strategy could be fundamentally affected by the emphasis placed on each of these drivers.

- Commercial and Structural Issues which hold back the City Centre.
- Transport and Movement Issues.
Conservation of the Historic Environment.

2. Over-riding aspirations which must be delivered.

- Reinforce the role of the City Centre as a regional shopping, employment and cultural centre.
- The development of the City Centre as a sustainable neighbourhood in its own right.
- Diversification of uses.
- Public Realm.
- Links to neighbouring areas.
- Integration with the plans of stakeholders within and adjoining the City Centre.
- Delivery of the retail capacity as set out in the Core Strategy.

4.6 Looking at the issues in this way clearly shows that a very broad range of options and alternatives for a City Centre renewal strategy could be developed. The three issues in the first group clearly influence the direction of the strategy, and therefore must be carefully balanced to ensure that the emphasis placed on one does not lead to the failure to address the issues raised by another. For example, too much emphasis on the conservation of City Centre buildings could limit the amount of redevelopment which could take place, which could mean that the serious structural problems affecting the City Centre are not resolved.

4.7 The set of 7 issues in the second group do not skew the direction of the potential Strategy, since they must be addressed in whatever Strategy is formulated. This means that these issues clearly have a high priority, and alternatives should be developed looking at how they can be delivered within the Strategy.

A Flexible Strategy

4.8 The City Centre and University AAP will set a Strategy for the City Centre covering the period up to 2021, and beyond. It must therefore be flexible enough to take account of the potential changes in people's lifestyles in the longer term. For example, rising fuel prices and awareness of climate change could lead to changes in travel habits, and less reliance on the car as the main way for people to get to the City Centre. The Strategy must be able to deal with such scenarios, by ensuring that proposals are adaptable and allow developers scope to come up with solutions when schemes are being designed.
A range of options

4.9 A detailed analysis of different options and alternatives is set out in the City Centre & University AAP Sustainability Appraisal Report. The broad options and alternative approaches which have been considered are briefly detailed below:

- **A two-centred, bi-polar city.** The idea of a city with two centres was considered following comments received during consultation on the Core Strategy and the development of the Local Economic Strategy. This idea explored the potential to develop a second major centre in northern Plymouth, to complement the City Centre. The bi-polar city concept has been identified in the adopted Core Strategy, and the Core Strategy determined that this would include a major district centre at Derriford, with growth in the longer term being subject to detailed impact assessment to safeguard the regional shopping role of the City Centre. Proposals to develop this new ‘heart’ for northern Plymouth will be detailed in the Derriford and Seaton AAP. The Council has consistently set out that it sees the City Centre as the priority location for major new retail developments.

- **Flood risk option.** The City Centre is situated in a former river valley, and could be subject to flooding from the sea through Millbay if sea level rise occurs. As part of the scoping of issues and constraints during the formulation of the Core Strategy, the impact flooding could have on the City Centre was thoroughly assessed. As a result, the Millbay and Stonehouse AAP ensures that flood protection measures will be put in place as part of the Millbay redevelopment which will protect the City Centre.

- **Heritage driven regeneration.** The City Centre and University AAP will clearly aim to conserve those aspects of the historic environment which are identified as being most important. The means by which this is done, however, could have significant effects on the Strategy. The alternative approaches range from using tools such as conservation area and listed building designations, to design frameworks and guidelines. The AAP Strategy must take account of the historic environment, by recognising priorities for conservation and identifying opportunities to improve and enhance priority areas, but the weight given to these issues must be balanced against other considerations.

- **Development driven regeneration.** A strategy placing greater emphasis on redevelopment driven purely on commercial principles could lead to changes and redevelopment of the City Centre, and could lead to more, higher quality shopping. However, development interventions need to be targeted to address the structural issues set out in the Issues section above, and need to be careful planned to avoid harming elements of the historic environment identified as priorities.

- **Regeneration led by sustainable transport options.** Clearly the transport planning of the City Centre is the ‘glue’ which enables City Centre developments to take place. A thriving City Centre which is the focus of trips from the City and from its wider catchment area is clearly a sustainable model. Maximising the choice of mode of transport that people have is also important to the Strategy, as it is
key to ensure that people can use public transport, walk or cycle to get to the City Centre. The Strategy must also ensure that the City Centre is accessible by car, as it is likely that the car will remain a very important means of travel for users of the City Centre in the short and medium term. The Strategy must therefore be flexible so that it can adapt to possible changes in travel behaviour over the next few decades.

- **Low carbon alternatives.** Strategy options can be drawn up based on a low carbon economy, particularly looking at movement patterns, handling of waste, the sustainability of City Centre neighbourhoods.

**4.10** More detailed options for specific parts of the City Centre or for particular parts of the Strategy have been assessed based on:

- Increasing the amount of housing in the City Centre, which assists in the creation of sustainable city centre communities and is a key driver in diversifying activity in the City Centre.

- Incorporating the University Area Masterplan, which has been produced by the University and is something which the AAP must include. There are various options for relating the masterplan to adjacent areas, such as the museum and North Hill, North Cross, and the potential for a new office quarter between Mayflower Street and North Cross.

- The West End Strategy “Awakening The West End” also needs to be incorporated into the City Centre Strategy. There are alternatives concerning the uses for several key sites in the West End, the future role to be played by the market, and the areas, particularly along Cornwall Street, where the West End Strategy area ends and the Core City Centre begins.

- There are several alternatives concerning how links to surrounding areas such as Millbay, the Hoe, Central Park and SuttonHarbour can be achieved.

- There is clearly scope to look at smaller scale retail change than is implied by the Core Strategy. These options must, however, be carefully considered against the need to address the structural problems of the City Centre, and the need to produce a regional shopping destination.

- Identifying the role each of the City Centre roads plays; whether a road is important as a through route, as a way into the City Centre for traffic and buses, or whether it is less important as a traffic route and has more importance for pedestrians, cyclists, or as a shopping street.

**4.11** The above lists sketch out the basis for a number of options for taking the City Centre forward. Some of these relate to the development of the overarching City Centre Strategy which will be set out in the AAP. Others are more to do with the development of individual proposals and components of the Strategy, and these
may need to be developed in more detail as work on the proposals and policies which will ‘flesh out’ the Strategy progresses. The full assessment of these options is set out in the Sustainability Appraisal report.

Have we correctly identified the main drivers for a City Centre Strategy?
What other options could we use to develop a Strategy?
5 So what might this strategy look like?

5.1 This consultation document sets out the Council’s preferred course of action for the regeneration of the City Centre by setting out the key ingredients which will be used to frame the detailed policies and proposals which will make up the Area Action Plan. The next steps in the production of the AAP will be to bring together the results of consultation and engagement with the public and stakeholders with further work on the AAP evidence base, to produce the detailed policies and proposals which will form the final version of the AAP.

5.2 The key ingredients of the preferred strategic approach are:

5.3 The Strategy should identify separate City Centre Quarters, each of which has a distinct identity and which has a unique attraction for visitors which is recognisably different to the other quarters. Each quarter should be a destination in itself.

5.4 These Quarters could include:

- The University and Cultural Quarter – including the University campus, North Hill and the Museum, and PCAD.
- The Northern Office Quarter – including the City Centre ‘triangle’ north of Mayflower Street.
- The Core Retail Quarter – including Armada Way and the eastern stretches of Cornwall Street and New George Street to Drakes Circus.
- The West End Independent Quarter/Market Quarter – including the West End focused on the Market, opportunities for redevelopment of Colin Campbell Court and the relationship to Toys ’R’ Us.
- The Leisure Quarter – including the area along Royal Parade to the west of Armada Way, with a focus provided by the Theatre Royal.
- The Administration Quarter – including the area to the south of Royal Parade from the Guildhall eastwards.

5.5 This part of the strategy would therefore provide the opportunity for people to visit the City Centre for a range of different reasons, and give each of the quarters its own unique selling point to use to attract people specifically to that destination. This would mean that the detailed AAP strategy for the renewal of the City Centre would identify changes and priorities for each of the ‘City Centre Blocks’ to show the role they will play within the Quarters Plan. A possible ‘Plan of the Quarters’ is shown below:
5.6 The Strategy should be underpinned and founded on a sound commercial strategy which is attractive to investors and which corrects the structural problems which have been identified.

5.7 It should:

**Identify a site for a major development opportunity which will:**

- Provide a major new anchor store which will correct the current poor distribution of anchor stores across the core retail area.
- Achieve most of the floorspace targets set out in the Core Strategy.
- Provide a range of retail units with sizes which match the requirements of retailers at the time of construction, and which are flexible and adaptable.
- Intensify and enhance the core retail area and provide a supply of good quality structures which are fit for purpose.
- Provide a renewal of the existing poor quality buildings in the centre.
Create a greater diversity of uses in the centre, including significant amounts of residential development and offices.

Identify other parts of the City Centre which could be redeveloped to provide a wider range of retail units.

5.8 A key element of this part of the Strategy would therefore be the identification of significant areas of the City Centre which could be subject to major redevelopment.

Have we put the right emphasis on a development led regeneration strategy?
Do you support the principle of major redevelopment in the City Centre?

5.9 The City Centre Strategy should retain and respect the key historic environment character of the City Centre, by identifying and protecting the most important elements whilst providing the flexibility to allow redevelopment and regeneration. This will mean:

- Preserving the beaux arts street grid and using it as the basis for renewal plans.
- Locally listing buildings of the highest quality.
- Producing a historic environment policy to express the vision and guide future development.
- **Not** designating a City Centre Conservation Area.
- **Not** pursuing the statutory listing of any more buildings.

5.10 A key element of this part of the Strategy would be the principle that the highest quality buildings are found along Royal Parade, but that quality deteriorates with distance north along Armada Way, producing a less important and less sensitive environment.

Do you think there are historically important parts of the City Centre?
Should we try to conserve these areas, and if so will the Strategy do enough?

5.11 The Strategy should be based on sound transport and movement principles. These principles should include:

- A parking policy setting out parking to floorspace ratios and the principle that parking should be concentrated in large, high quality car parks within but on the edge of the City Centre.
Identifying the key strategic road network where capacity must be maintained in order to minimise delays for cars and for public transport. Guidelines should be put in place for how these routes will be managed, which junctions are critical to maintaining movement around the City Centre, where there are opportunities to create better public spaces through the redistribution of highway space, and where and how there are opportunities to ‘green’ the ring road.

- Identifying those parts of the highway network which are not key strategic routes, and which could therefore be subject to more imaginative treatments, such as shared space or even closure to traffic during parts of the day, and which could therefore contribute to an improved public realm in the City Centre.
- Improved links to Millbay (by examining the relationship with the proposed Boulevard), Sutton Harbour (potentially via the proposed Bretonside redevelopment), The Hoe and Central Park, and through the redesign of the Western Approach/Union Street junction.
- Improvements to the Railway Station to create a first class gateway to the City.

How do you think people will travel to the City Centre in the future?

Is the Strategy identifying the right measures to enable people to get to the City Centre easily?

5.12 The Strategy should include a set of City Centre Design and Public Realm proposals. These proposals should aim to put in place major improvements to the public realm and principles to ensure that all new development in the City Centre is designed to the highest quality, whether it is major redevelopment opportunities or changes to shop fronts. These principles should include:

- Taller buildings in the City Centre to give a better enclosure and urban feel to the street grid.
- Cover provided over the Armada Way/Cornwall Street crossroads and along Cornwall Street East.
Using principles of ‘Urban Cooling’ to create spaces which are comfortable and cool, taking advantage of shade from trees and buildings and encouraging an outdoors café culture.

Guidelines on how the design of new buildings should relate to the street grid, setting out clearly the principles which should not be compromised.

How could the image and appearance of buildings in the City Centre be improved?

What public spaces in the City Centre are in the most need of improvement?

How could the public realm in the City Centre be improved?

5.13 The Strategy should incorporate and integrate the West End Strategy. It should largely reflect the recommendations and vision of the West End Study, but with alterations to ensure that the West End Strategy can be joined seamlessly with the more recent and extensive work on the rest of the City Centre.

The key areas where the West End Study needs to be looked at closely are:

- The places where the West End Study area adjoins the rest of the City Centre, particularly along Cornwall Street
- The nature of development on Colin Campbell Court.

5.14 This part of the Strategy should aim to reinforce the role of the West End as the part of Plymouth devoted to smaller scale, predominantly independent retailing and providing a wider range of attractions and experiences for visitors. It should be based around the principles of creating intimate and interesting places for people to experience, fostering independent traders and giving the market a renewed role as the hub of the West End, and creating a development at Colin Campbell Court which will increase and diversify the number of people visiting the area.

How do you think the West End will fit with the City Centre Strategy?

Do you think the West End can develop a successful distinctive identity?

What ideas do you have that could improve the image of the West End?
A glimpse of what this could mean...

5.15 At this stage of assembling a Strategy for the regeneration and renewal of the City Centre, it is too soon to set out detailed proposals for specific sites. Quite simply, the future of the City Centre is crucial to the success of Plymouth and is too important to rush. The City Council needs to move on from the initial evidence gathering part of the process, to begin a dialogue with the people of the City and the stakeholders in the City Centre so that a Strategy can be set out in detail. The ingredients set out in this document do, however suggest some glimpses of how a Strategy might look in detail:

- A new plan for Colin Campbell Court, with a use or uses which complement its location between the West End Independent/Market Quarter and the Leisure Quarter, which improve the appearance and identity of the area and which introduces a new and diverse set of visitors to the West End.
- Large amounts of new residential development in the City Centre to contribute to the diversification of the centre.
- A greater profile for the Pannier Market, acting as the focus and hub for activity in the West End and incorporating a local food specialism.
- A new plan for the Civic Centre site which will help to strengthen links to the Hoe and which will relate to the Leisure Quarter which the Civic Centre site would sit within.
- A scheme for Royal Parade which protects its appearance and heritage as one of Plymouth’s grand boulevards and which creates an attractive route for people to promenade between Millbay, the City Centre, the Hoe and Sutton Harbour.
- The greatest opportunity for a major retail led development to drive the success of the City Centre being along Cornwall Street with a key focus on Armada Way.
- Retail uses in the ‘northern triangle’ between Mayflower Street and North Cross being redeveloped and replaced by office and high density residential uses.
- Further developments consolidating the University Campus.
- The creation of a Cultural Quarter centred on North Hill and including the University area and improvement proposals and potential PCAD redevelopments.
- Major improvements to public realm across the City Centre.

- Redevelopment of the Railway Station and North Cross for a mix of offices, residential and potentially small scale retail, to create a first class gateway to the City at the start of a clear, direct and attractive route to the City Centre.
- Completion of the redevelopment proposals around Derry’s Cross which were set out in the First Deposit Local Plan.
6 Community benefits

6.1 The Council will secure community benefits in the City Centre and University area through Section 106 agreements and other mechanisms. The following principles could be applied:

- Should the Council relax its affordable housing requirement in the City Centre to ensure that major developments can be made economically viable? The Council will ensure that the total amount of housing to be built in Plymouth meets the need for the range, mix and type of homes across the City – it may be that the types of dwellings appropriate to the developments in the City Centre are not the types of dwellings most required to meet affordable housing needs across the City.

- Should the Council place a high priority on measures to improve the public realm in the City Centre? Such measures could include improvements to surfaces and landscaped areas, but could also involve the creation of new public spaces, new green spaces and more public art.

- What facilities should be required to ensure that sustainable communities are created in the City Centre? What community facilities are needed and what facilities are already available? What additional cultural facilities could be provided in the City Centre and University area?

- How could pedestrian and cycle links be improved to neighbouring areas and communities such as Central Park, Sutton Harbour, Millbay, The Hoe and Stonehouse? What transport infrastructure is needed to enable change to happen?

Do you agree that these points should be the main principles used to identify community benefits in the City Centre & University area?

Are there any other priorities/principles which we should include?
7 Glossary

7.1 Active frontage
A building frontage with entrances and windows that overlook the public realm and generate activity, overlooking, and therefore safety on the street.

Affordable housing
Housing, whether for rent, shared ownership or outright purchase, provided at a cost considered affordable in relation to incomes that are average or below average, or in relation to the price of general market housing.

Amenity
A feature that contributes to the overall character or enjoyment of an area. For example, open land, trees, historic buildings or less tangible factors such as tranquility.

Annual Monitoring Report (AMR)
Assesses the implementation of the LDS and the extent to which policies are successfully being implemented and targets met.

Amenity open space
Open space with the principle purpose of creating a pleasant character to an area, rather than use for recreation and leisure.

Area Action Plan (AAP)
A type of Development Plan Document that will be used to provide a planning framework for areas of significant change or conservation.

Brownfield site
Previously developed land that is or was occupied by a permanent structure (excluding agricultural or forestry buildings) and associated infrastructure.

Built form
Buildings and structures.

Character (of area)
Individual distinctiveness created from a combination of natural and man-made elements with historic, socio-economic and other factors.

Commitment
All land with current planning permission or allocated in adopted development plans for development (particularly residential development).

Conservation Area
An area of special architectural and/or historic interest that deserves preservation or enhancement of its character or appearance.

Constraint
A limiting factor that affects development, conservation etc.
Core Strategy
The key Development Plan document. It sets out the long-term spatial vision and spatial objectives for the local planning authority area and the strategic policies and proposals to deliver that vision. It will contain a set of primary policies for delivering the core strategy. Broad locations for development are also set out. Plymouth's Core Strategy was adopted in April 2007.

Council
The local authority, Plymouth City Council.

Delivery
The implementation of an objective or planned proposal within the criteria set by the plan.

Demands
The aspirations of the public, which may be greater than their needs.

Development
Development is defined under the 1990 Town and Country Planning Act as “the carrying out of building, engineering, mining or other operation in, on, over or under land, or the making of any material change in the use of any building or other land.” Most forms of development require planning permission (see also “permitted development”).

Development Brief
A document that outlines detailed planning requirements for the development of a site. It is subject to public consultation prior to publication.

Development Plan
This will consist of Regional Spatial Strategies and Development Plan Documents contained within a Local Development Framework. It will also contain any ‘saved plans’ that affect the area.

Development Plan Documents (DPDs)
These are prepared by the Council. They are spatial planning documents and subject to independent examination. There will be a right for those making representations seeking change to be heard at an independent examination.

Developer contribution
(see Planning Obligations)

Distinctiveness (of an area)
(see Character)

Environmental appraisal
Applicants for certain types of development, usually more significant schemes, are required to submit an “environmental statement” accompanying a planning application. This evaluates the likely environmental impacts of the development, together with an assessment of how the severity of the impacts could be reduced.
Evidence Base
The researched, documented, analysed and verified basis for all the components of a Local Development Framework.

First Deposit Local Plan
The review of the adopted 1996 Plymouth Local Plan that was published in 2001 following public consultation, but was not subject to a public examination.

‘Front-loading’
The important pre-production processes involved in preparation of Local Development Documents seen by the Government as the key to efficient production and examination of LDDs. The Sustainability Appraisal, Statement of Community Involvement, Local Development Scheme and the Annual Monitoring Report play a large part in ensuring front-loading.

High Quality Public Transport (HQPT)
HQPT is characterised by the following features: reliability; high quality information before and throughout the journey; a safe and pleasant walk to the station / stop; a safe and pleasant wait at the station / stop; good ride quality; a positive image of vehicles and infrastructure; and the aspiration to progress from bus services through intermediate technologies to LRT services.

Home-zone
A small highly traffic calmed residential area, often with road and pavement integrated into a single surface, where pedestrians and cyclists have priority over cars.

Housing stock
The total amount of housing within a plan area, but this may be divided into components such as private housing stock or rented housing stock.

HSE
Health and Safety Executive. The Health and Safety Commission is responsible for health and safety regulation in Great Britain. The Health and Safety Executive and local government are the enforcing authorities who work in support of the Commission.

Impermeable
Buildings or parts of an area that do not allow pedestrian movement through them.

Implementation
Carrying out the proposed actions to required standards that are set out in the plan.

Independent Examination
An examination held in public by an Inspector from the Planning Inspectorate.

Infrastructure
The basic facilities, services and installations needed for the functioning of a community. It normally includes transport, communications, water and power.

Legal Agreement
A legally binding contract, between a developer and the local planning authority that constitutes a planning obligation (see also definition for planning obligation).

**Lifetime Homes**
What makes a Lifetime Home is the incorporation of 16 design features that together create a flexible blueprint for accessible and adaptable housing in any setting. The flexibility and adaptability of Lifetime Homes accommodate life events quickly, cost-effectively and without upheaval.

**Listed Building**
A building mentioned in statutory lists as being of special architectural or historic interest under the Listed Buildings and Conservation Areas Act. There are different grades of listing to indicate relative interest.

**Live/Work Unit**
A dwelling and workspace combined within one unit of accommodation – for example, an artist’s flat and studio space.

**Local Development Framework (LDF)**
This includes a portfolio of Local Development Documents that provide a framework for delivering the spatial planning strategy for the area. It also contains a number of other documents, including the annual monitoring report and any ‘saved’ plans that affect the area.

**Local Development Document (LDD)**
This is either a Development Plan Document or a Supplementary Planning Document and is contained in a Local Development Framework.

**Local Planning Authority**
The local authority or council that is empowered by law to exercise planning functions. In Plymouth’s case this is Plymouth City Council.

**Local Transport Plan (LTP2)**
A five-year rolling plan produced by the Highway Authority. In Plymouth’s case this is Plymouth City Council.

**Local Development Scheme (LDS)**
This sets out the programme for the preparation of the Local Development Documents.

**Material Consideration**
A matter that should be taken into account in deciding a planning application or on an appeal against a planning decision.

**Monitoring (and review)**
The process of measuring (in terms of quantity and quality) the changes in conditions and trends, impact of policies, performance of the plan against its objectives and targets and progress in delivering outputs.
**Needs**
The necessary requirements of the public, which may be less or different than their demands.

**Objective**
A statement that specifies the direction and amount of desired change in trends or in conditions.

**Output**
The direct effect of the plan’s policies measured by indicators such as annual housing completion rate.

**Partner Organisations**
Other organisations that are in partnership with the Council, either through a written agreement or a looser form of partnership.

**Permeability**
The extent to which it is possible to move through buildings or areas.

**Planning Condition**
A written condition on a planning permission that restricts the development in some way to achieve a stated purpose.

**Planning Obligation (and / or Section 106 agreement)**
A legal undertaking given to a Council by a developer who is seeking planning permission for a development. It can be used to regulate or restrict the use of land, require the carrying out of specific actions or require payments to be made to the planning authority.

**Planning System**
The system of town and country planning originally created in 1947 to control the use and development of land. It has been modified extensively since then. The Planning and Compulsory Purchase Act 2004 led to spatial planning as the latest revision of the planning system.

**Planning Policy**
A guiding principle, that has statutory weight, that sets out a required process or procedure for decisions, actions, etc.

**Public Realm**
Those areas in cities and towns that are visible, useable and accessible by the public.

**PPG and PPS**

**Programme**
A time-related schedule of operations and/or funding to achieve a stated purpose.

**Proposal**
A positive-worded policy of the Council that proposes a course of action or an allocation of land for a particular use or development.

**Proposals Map**
The function of the proposals map is to illustrate the policies and proposals in the development plan documents and any saved policies that are included in the Local Development Framework. It will have a geographical base at a scale that allows the policies and proposals to be illustrated clearly in map form.

**Public Open Space**
An allocation or a requirement in a development plan for open space with unfettered access by the public.

**Public realm**
Those areas in cities and towns that are visible, useable and accessible by the public.

**Regional Spatial Strategy (RSS)**
The main policy document setting out the Spatial Strategy for growth and development in the south west region and the strategic policies which will shape this.

**Section 106 agreement**
See definition for Planning Obligation.

**Spatial Planning**
An ongoing, enduring process of managing change, by a range of interests that achieves sustainable development.

**Spatial Vision**
A brief description of how the area will be changed by the end of the plan period.

**Statement of Community Involvement (SCI)**
sets out the standards to be achieved when involving the community in the preparation of plans and in development control decisions. It is subject to independent examination.

**Statutory**
Required by law (statute), usually through an Act of Parliament.

**Strategic Environmental Assessment (SEA)**
A generic term used internationally to describe environmental assessment as applied to policies, plans and programmes. The European ‘SEA Directive’ (2001/42/EC) does not in fact use the term strategic environmental assessment; it requires a formal ‘environmental assessment’ of certain plans and programmes, including those in the field of planning and land use.

**Strategic**
A strategy-based policy or decision that operates at a higher level than a policy or decision created to deal with local and day-to-day issues.
Supplementary Planning Documents (SPDs)
These cover a wide range of issues on which the plan-making authority wishes to provide policies or guidance to supplement the policies and proposals in development plan documents. They will not form part of the development plan or be subject to independent examination.

Sustainable Development
A widely used definition drawn up by the World Commission on Environment and Development in 1987: "Development that meets the needs of the present without compromising the ability of future generations to meet their own needs." The government has set out four aims for sustainable development in its strategy A Better Quality of Life, a Strategy for Sustainable Development in the UK. The four aims, to be achieved simultaneously, are: social progress which recognises the needs of everyone; effective protection of the environment; prudent use of natural resources; and maintenance of high and stable levels of economic growth and employment.

Sustainability Appraisal
This is a mandatory process under the Planning and Compulsory Purchase Act 2004 and is used to promote sustainable development through the integration of social, environmental and economic considerations into DPDs and SPDs.

Sustrans
The UK’s leading sustainable transport charity. One of its projects is to establish a national cycle network.

Targets
Objectives expressed in terms of specified amounts of change in specified periods of time.

Tenure
The conditions on which property is held. Examples are owner occupation, renting and shared ownership.

Townscape
The general appearance of a built-up area, for example a street a town or city.

Transport Interchange
A planned facility for changing between different modes of transport (e.g. bus/car/cycle/taxi).

Traffic calming
Measures to reduce the speed of motor traffic, particularly in residential areas. They include education, enforcement and engineering.

Use Classes Order
8 List of evidence base documents

Plymouth First Deposit Local Plan, Plymouth City Council, 2001

City Centre Precinct Urban Design Framework, Plymouth City Council, 2002


Vision for Plymouth, Mackay, Zogolovich and Haradine, 2004

City Centre and University Area Action Plan Issues and Options Report, Plymouth City Council, March 2005

Summary Report of Responses to City Centre and University Area Action Plan Issues and Options consultation, Plymouth City Council, 2005


Awakening the West End, LHC Urban Design/Plymouth City Centre Company, 2006

Plymouth University Strategic Development Plan, Nicholas Burwell Architects

PCAD Urban Design Framework, PCC/PCAD

Adopted Plymouth Core Strategy Plymouth City Council, April 2007


Plymouth City Centre Precinct – Assessment of strategic options for the management of its heritage assets., PCC, October 2008


LDF Local Development Scheme, Plymouth City Council, June 2008

Plymouth City Centre Future Direction Investment and Development Strategy, Cushman and Wakefield LLP, 2008

City Centre and University Area Action Plan Consultation Document, Plymouth City Council, October 2008

City Centre and University AAP Sustainability Appraisal Report, Plymouth City Council, October 2008

North Cross Design Framework, Form Design Architects Group, 2008
8.1 There are also a number of documents which contain information about Plymouth, which have contributed to the development of the City Centre and University Consultation Document. These can be viewed at: www.plymouth.gov.uk/ldf
city centre and university area action plan 2006-2021
sustainability appraisal
issues and preferred options consultation
november 2008
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1 Introduction

1.1 Planning Authorities are required to produce a Sustainability Appraisal (SA), alongside plans that form part of a Local Development Framework (LDF). Plymouth's City Centre Area Action Plan (AAP) is such a plan. This document is the SA report to accompany the November 2008 Issues and Preferred Options Consultation document that has been produced as part of the preparation of that Area Action Plan.

What is Sustainability Appraisal?

1.2 Sustainability Appraisal uses a range of sustainability objectives and indicators to test whether the plans, policies and proposals are the best possible ones for delivering sustainable development. Sustainability Appraisal is a tool that is used to ensure the full range of environmental, social and economic effects of the LDF are considered during a plans formulation. It seeks to ask the following questions about these effects:

- Could these effects be of special significance?
- Are there ways of reducing or mitigating adverse effects?
- Can any beneficial effects be further enhanced by positive planning?

1.3 The SA plays an important role in improving the quality of the councils LDF by ensuring that it seeks to deliver national & local objectives for sustainable development.

1.4 Sustainability Appraisal is a mandatory requirement of the Planning & Compulsory Purchase Act 2004 for the production of all DPD's & SPD's. This SA will also fulfil the requirement for the AAP to assessed in line with the Strategic Environmental Assessment (SEA) Directive (2001/42/EC).

1.5 Whilst SA is an iterative process, a key output is a Sustainability Appraisal report which describes what elements of the plan have been appraised and how, and the likely significant sustainability effects of the implementation of the plan.

1.6 This document is published along with the AAP consultation document, to inform the process. It is also open to comment, as part of this consultation process.

What is the City Centre Area Action Plan?

1.7 AAP's are the part of the LDF that provide the planning framework for areas where significant change or conservation is needed. They are central to the delivery of Plymouth's LDF in that they set the policies and proposals that direct development to the city's waterfront regeneration areas, as well as to the major opportunity sites located along Plymouth's Eastern and Northern Corridors.

1.8 The City Council's vision for the City Centre/University area is to create a lively and vibrant mixed use regional centre which provides high quality regional shopping, together with a range of facilities for living, working and recreation - both by day and night.
1.9 The City Centre Area Action Plan will set out land use policies and proposals to create a real ‘downtown’ centre that offers residents and visitors a 24-hour lifestyle, with specialised shops, restaurants and pubs alongside a choice of entertainment and culture; as well as improving connections with adjacent areas.

1.10 The Council anticipates there will be 4 key stages in the preparation of the City Centre & University AAP:

- Issues and Options (published March 2005)
- Issues and Preferred Options Consultation Document (November 2008)
- Pre submission draft (due August 2009)
- Submission, Public Examination & Adoption (by November 2010)

1.11 Each of these consultation stages will be subject to a Sustainability Appraisal. The results from these appraisals will be used to improve the plan.

What does Sustainability Appraisal involve?

1.12 Plymouth City Council’s SA follow the 5 stages set out in ODPMs (2005) guidance. Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents (ODPM, 2005). These are:

- Stage A: Scoping - Setting the context and objectives, establishing the baseline and deciding on the scope of the appraisal
- Stage B: Appraisal & Options - Developing and refining options and assessing effects
- Stage C: Reporting - Preparing the Sustainability Appraisal Report
- Stage D: Consulting on the draft plan and the Sustainability Appraisal Report
- Stage E: Monitoring the significant effects of implementing the DPD.

1.13 The Council published its revised Sustainability Appraisal Scoping Report in March 2008. This is amplified by Chapter 2 of this document which scopes out key sustainability issues specific to the City Centre.

1.14 This report aims to achieve Stages B and C, and will focus on a consideration of the sustainability of the draft AAP’s objectives, and the sustainability pros & cons of the different options, and preferred options that exist for delivering these objectives.

1.15 The appraisals are undertaken using an appraisal framework developed and set out in the Sustainability Appraisal Scoping Report (March 2008). The SA framework sets out the sustainability objectives and appraisal criteria that will be used to test whether the options being explored in the draft City Centre AAP, are the best possible ones for delivering sustainable development. The full SA Framework is included in Appendix 1. The SA objectives and appraisal criteria are summarised below in Table 1.
### High Level SA Objective | Appraisal Criteria: Does the policy or proposal?
--- | ---
Improve health, well being, and community safety | Improve health & support healthy lifestyles
None | Reduce health inequalities
None | Reduce anti social behaviour, crime and fear of crime
Support communities & neighbourhoods that meet people’s needs | Help provide a suitable mix of housing that is available & affordable for everyone
Support the delivery of a full range of community facilities
Give everyone access to local opportunities for learning, training, skills, knowledge & culture
Provide a range of opportunities for people to work locally
Provide access to open space / greenspace for sports, play & informal recreation
Help provide opportunities for participation in local action and decision making
A diverse and thriving economy that meets peoples needs | Support business and enterprise that will improve the quantity and quality of jobs within the city.
Support the development of a skilled workforce and increase levels of economic participation.
Encourage local enterprise and support markets for local labour, goods & services.
Reduce the vulnerability of the economy to climate change
A well connected city that meets people’s need for access to places and services with least damage to communities and the environment | Reduce the need desire to travel by car or air.
Help everyone to access basic services easily safely and affordably
Make public transport, cycling & walking easier and more attractive
Maintain & enhance the quality of the city’s built & natural environment | Avoid areas of high flood risk and reduce the vulnerability to future flooding
Maintain and enhance historical buildings, structures, monuments and remains of acknowledged importance
Provide for a high quality urban environment with highest possible standards of urban design
Protect & enhance biological & geological diversity
Protect and enhance local landscape & green space
Minimise consumption of natural resources | Reduce non renewable energy consumption and green house gas emissions
Reduce water consumption
Minimise consumption and extraction of minerals
Reduce waste
Minimise land, water, air and light pollution

**Table 1** The Plymouth LDF SA Framework: Objectives & Appraisal Criteria

1.16 This appraisal was undertaken alongside the publication of the November 2008 consultation document, with a view to documenting the direction of travel against SA objectives and make recommendations that could be used to improve the Pre-submission Draft. It has been completed in-house by officers within Plymouth.
City Council's Planning Service (although separate from the team preparing the AAP), with particular support from colleagues with specialisms in transport and public health.
2 City Centre Sustainability Issues

2.1 The purpose of this chapter is to scope out the key sustainability issues facing the City Centre. The issues at a City wide scale have already been identified as part of the SA Scoping Report (March 2008). The purpose here is to identify the specific challenges or opportunities pertinent to the City Centre.

2.2 There are a number of specific plans, strategies and evidence based studies that help us identify and understand the key sustainability issues facing the city centre. These are:

- The Plymouth Local Development Framework (LDF) Core Strategy (adopted 2007)
- City Centre Future Direction Investment Development Framework (2008)
- Plymouth Shopping Study (2006)
- City Centre Sustainable Neighbourhood Assessment (2007)
- Plymouth Infrastructure Study (2008)

2.3 To provide a baseline, the information from these key documents, and others, is presented against the six headline objectives from the SA Framework:

- Improve health, well being, and community safety
- Support communities & neighbourhoods that meet people's needs
- A diverse and thriving economy that meets peoples needs
- A well connected city that meets people's need for access to places and services with least damage to communities and the environment
- Maintain & enhance the quality of the city's built & natural environment
- Minimise consumption of natural resources

Improve health, well being and community safety

2.4 The City Centre population can be complicated to analyse in public health terms, as the neighbourhood includes pockets of both relatively affluent and disadvantaged groups. The City Centre Sustainable Neighbourhood Assessment (SNA) stated that the health of the resident population (approx 400) was poor compared to much of the rest of the city, especially with respect to their Personal Assessments of their state of health.

2.5 Public health intelligence work in Plymouth routinely groups the city centre population with the third 'most disadvantaged' neighbourhoods (out of the 43 recognised neighbourhoods) in the city.

2.6 Families living in the City Centre are a cause for public health concern, with nearly 11% in temporary accommodation and 8.5% experiencing poor housing-related health effects. A third of families are described as vulnerable and 10% experience social isolation, a fifth have a parent with depression/mental ill-health; 23% are
single-parent families; 12% have problems with English; 41% are rated as low-income and benefit-dependent. In each case, these Health Visitor results are some of the worse in the city.

2.7 Life expectancy for all groups in Plymouth has risen by 3.2% since 1991. However life expectancy for the most disadvantaged neighbourhoods such as the City Centre has only risen by 3%, in contrast with a rise of 3.3% for the most advantaged neighbourhoods.

2.8 The City Centre was seen as the 5th worst neighbourhood in terms of crime, perhaps resulting from previous design policies for the built environment. Crime statistics for the City Centre Neighbourhood for 2007/8 were:

<table>
<thead>
<tr>
<th></th>
<th>Recorded this year</th>
<th>Recorded last year</th>
<th>%change year on year</th>
<th>Total detected this year</th>
<th>% total detected</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total</td>
<td>4196</td>
<td>4602</td>
<td>-8.8%</td>
<td>1715</td>
<td>40.9</td>
</tr>
</tbody>
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2.9 To improve the legacy of this social environment, the AAP should not only aim to increase the number of residents in this area, in order to increase the critical mass necessary to support necessary services, but also broaden the provision of access to health facilities for the proposed additional residents in the city centre area.

2.10 Providing locations for primary and community health services needs to be considered as part of the development of the AAP. Alternatively, good access to facilities close to the city centre, but immediately outside of the boundary will be required to ensure that the ‘new community’ becomes a sustainable unit.

Support communities and neighbourhoods that meet peoples’ needs

2.11 The City Centre Sustainable Neighbourhood Assessment (SNA) indicates that the range, type and mix of the housing stock is not well balanced. Just 33% of the available homes were owner-occupied (as opposed to 64% for the city as a whole and 69% nationally). 82% of the stock was made up of flats and less than 1% was detached properties. The majority of the housing stock is occupied by the student population, with a small enclave of sheltered accommodation at Harwell Court. Currently, the lack of affordable housing in the City Centre is an issue.

2.12 Given the small number of schoolchildren current living in the City Centre, there are no primary or secondary schools with in the AAP area. The City Centre includes a large part of the campus of the University of Plymouth, which is a major international educational institution. Further tertiary educational facilities are provided at the City College, about 2 km from the City Centre. It is essential that good access to primary, secondary and tertiary facilities is provided for the schoolchildren and students, who will be living in the City Centre in future years.
2.13 With respect to local primary and secondary schools provision, the latest proposals contained with the Lifelong Learning strategy document (Ideas for Change II) envisage:

- the expansion of St Peter's CE Primary School to meet the additional demand from the Millbay redevelopment;
- the expansion of Holy Cross RC Primary School on a new site in Exeter Street;
- the eventual demise of The Cathedral RC Primary School;
- a new secondary school, based on Stoke Damerel Community College, to meet the additional demands of the waterfront developments.

2.14 Any additional demand for primary school places arising from the City Centre development would be met at Pilgrim and Holy Cross Primary Schools, suitably expanded. The new secondary school referred to above and/or Lipson Community College would be expected to meet any additional demand for secondary school places.

2.15 The City Centre SNA stated that there was a poor balance of economic activity - with a large proportion of the population economically inactive, due to poor health and a lack of employment skills.

2.16 The Employment Land Review (Baker Associates 2006) stated that, whilst Plymouth as a whole has an excess of allocated employment land, there will be a shortfall of 10 hectares in the City Centre and Waterfront areas.

2.17 Plymouth City Council and the nearby University of Plymouth are the major public sector employers for the City Centre.

2.18 The Employment Land Review (ELR) stated that changes in the nature of employment, away from the manufacturing and distribution sectors towards knowledge-based commercial development, meant that considerably more jobs could be created on a given footprint of land. This would enable more employment and a wider range of employers to be concentrated in the City Centre.

2.19 The AAP will need to ensure that new residents are provided with a wider range of employment opportunities - and that a better quality of life is promoted to enable a higher proportion of existing residents to find work.

2.20 The City Centre has significant areas of open space in the form of public realm, but this is generally of poor quality. There is a shortage of accessible green space within the area, although significant green space assets such as Central Park and the Hoe are nearby, but access to these limited by a number of physical and perceptual barriers. There is one small play space in New George Street, but no allotment provision (although allotments exist in Central Park).
2.21 The City Centre is the main location for cultural activities, with several theatres and music venues in the area and adjacent to it. Sports facilities are provided at the nearby Pavilions complex and at Central Park. Although physically close to the area, the latter is not well connected to the City Centre.

2.22 The AAP should address the severance between the City Centre and neighbouring open space, leisure and cultural facilities - most notably those in Central Park.

A diverse and thriving economy that meets peoples' needs

2.23 The Plymouth Shopping Study (PSS 1996) indicated that a major expansion of the city’s core retail area would be necessary. It estimated that within the Plymouth catchment area a total of about £1,245bn of retail expenditure was available. Of this, Plymouth City Centre only attracted about £637m (51%).

2.24 The Plymouth LDF Core Strategy states that:

- The City Centre performs at about the average level, in retail terms, for a city of its size. However, there is a need for continued investment to establish its regional shopping role and to deliver regeneration benefits.
- Much of the office accommodation within the City Centre is out of date and dispersed, rather than within a clearly identifiable office core.

2.25 The City Centre Future Direction Investment Development Framework (2008) concluded that:

- The current footprint of the retail core is too large (larger than both Manchester and Liverpool).
- The unit floor size for the prime stores is too small - and too inflexible.
- 75% of the shops in the retail core are poorly anchored (by major retailers).
- Much of the retail stock is over 40 years old and is in a poor physical condition.
- The build quality of many retail units - notably those to the North and West of the core - is of a low standard.
- This provides a series of opportunities to expand and renew large sections of the City Centre’s retail offer.

2.26 Beyond 2011, the PSS forecast that there will be a growing capacity for additional floorspace, as a function of both greater available expenditure and expenditure growth per person.

2.27 By 2016, the PSS forecast that there will be capacity for a significant further development in the city - or a number of more modest developments. This could be of the order of two Drake Circus Developments.

2.28 The PSS estimated a growth in:

<table>
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<tr>
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<th>By 2011</th>
<th>By 2016</th>
<th>By 2021</th>
<th>By 2026</th>
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</table>
2.29 To retain a greater proportion of retail spending within the city and to establish Plymouth as a Regional shopping destination, a significant increase in the quantity and quality of retail floorspace is required. This should include one or more new anchor stores.

2.30 The economic base of the city centre should be diversified to include more, better-designed office accommodation.

**A well connected city that meets peoples’ need for access to places and services with least damage to communities and the environment**

2.31 The City Centre is a multiple origin-and-destination trip generator for employment, residential, leisure and shopping purposes - and it is the principal destination for both the city’s residents and from those living further afield.

2.32 The inner ring road, which surrounds the heart of the AAP area and separates the University Campus from the city centre core, performs a number of functions, some of which give rise to a conflict of purpose. Different sections of the inner ring road act as both arterial and distributor roads. Through traffic from the commercial ferry port and the east-west traffic movements occupy the same carriageways as local traffic. Public transport has some priority, but is still hostage to both private and commercial vehicular traffic flows at junctions - and to frequent interruptions at pedestrian crossings.

2.33 The road demarcates the central area, but is perceived to be a ‘concrete collar’ that discourages pedestrian movement and commercial expansion. The nature and critical future role of the Inner Ring Road is currently the subject of an investigation facilitated by CABE, with consideration being given to the reassignment of the Royal Parade section as a public transport corridor. Severance from the surrounding neighbourhoods and facilities, particularly from Millbay and Central Park, is seen as a major difficulty to integrating the city centre with the surrounding urban area.

2.34 The city’s main railway station is located just to the north west of the AAP area and is a critical element of public transport infrastructure. It’s current poor relationship to the rest of the city, poor accessibility, lack of prominence and legibility and unattractive design and setting seriously denigrates the first image many travellers get of the city.
2.35 The City Centre is a starting and finishing point for many of the local bus services, as well as for national and sub-regional bus and coach services. Bretonside bus station is a very poor gateway to the city. Remedial works have been carried out in recent years, but in addition to poor design and accessibility issues, problems such as vagrancy and anti social behaviour contribute to the overall negative perception. The relocation and replacement of the bus station facility are recognised as essential components of future transport infrastructure for Plymouth.

2.36 There are currently 23 public car parks serving the city centre, providing a total of 5,647 spaces, of which 244 are disabled parking spaces. Plymouth has low car parking to retail floor space in comparison to other equivalent cities. In addition, the city centre is served by 3 Park and Ride sites (at Central Park, Coypool and the George) with a total of 1,580 car parking spaces.

2.37 However, potential users to the east and west of the city are not currently served by Park and Ride services. The proposed High Quality Public Transport link serving Langage, Deep Lane Park & Ride, Sherford, Plymstock, Plymstock Quarry and the East End will improve the accessibility of the City Centre by public transport for all people using the A38 and living to the east of Plymouth. Longer term plans have identified a need for a Park & Ride at Saltash.

2.38 At peak times, the principal junctions and roads of the City Centre already suffer from significant congestion, which is believed to have a detrimental effect on the economic viability of the city centre. The construction of the Drake's Circus shopping centre and the provision of a surface-level pedestrian crossing on Royal Parade have added to congestion.

2.39 The tension between providing sufficient highway capacity to enable appropriate vehicular traffic movement to access the city centre - and for through-traffic driving through it to other destinations is a key sustainability issues facing the City Centre.

2.40 The traffic generated by the Drake's Circus redevelopment has resulted in significant congestion for public transport services on the City Centre loop. Bus operators have reported lost mileage and severe delays. Associated route amendments have reduced the accessibility of the East End from some parts of the City.

2.41 At present, there are capacity problems for public transport on Royal Parade. Longer and wider buses have been employed on routes around the city in recent years, resulting in the bus stop provision on Royal Parade becoming increasingly inadequate. Improvements in bus services, resulting in an increase in the frequency of services on key corridors, is exacerbating this problem, as typically more than one bus is at any given stop, at any one time.
2.42 Bus operators have concerns with the increasing number of pedestrian crossings on the City Centre loop. Operators cite delays at traffic lights as one the reasons why extra resources have been put into their routes to maintain current frequencies.

2.43 Mayflower East car park currently houses the Community Transport Shopmobility hire centre. The site is some distance from the main bus stops on Royal Parade and does not have a high profile. The dedicated Ring and Ride stop on Derrys Cross, and the Shopmobility service in Mayflower East and Drake Circus, would benefit from having a greater prominence as they are both ways in which the access of disabled and elderly people to the City Centre could be improved.

2.44 The delivery of the national concessionary fares scheme is a key issue affecting the accessibility of the City Centre. Free travel, for the over 60’s and the eligible disabled, is improving the access of both the City’s residents and of people from further afield. However, the large number of concessionaires is currently posing the City Council a challenge because of reduced capacity on the buses for fare paying passengers and the withdrawal of commercial routes by operators due to reduced revenue.

2.45 The whole of the pedestrianised area of the city centre is currently a no cycling zone. This is clearly a barrier to the promotion and development of cycling in the city. Provision for cyclists on key arterial routes into the centre is very patchy. Few recent pedestrian or cycling surveys have been undertaken, but those available indicate that scale of pedestrian movement around, into and out of the City Centre is significant; but there is a lack of strategy as to how to accommodate and encourage increased demand for these modes.

2.46 The attractiveness of the City Centre to pedestrians & cyclist must be enhanced. Balancing these improvements, whilst also avoiding major detrimental impacts on other transport modes is a key sustainability issue for the City Centre.

2.47 The AAP needs to set out a transport strategy that takes account of the radical change in transport use that will take place in the city centre in the coming decades. This will need to accommodate the change in city centres social environment from a retail led destination to a mixed use neighbourhood with a large residential community. It will also be necessary for the changing nature of transport demand/supply to be taken into account with a projected long term decline in provision for driver only car journeys and a progressive emphasis on more sustainable modes such as walking, cycling and public transport.

**Maintain and enhance the quality of the city’s built and natural environment**

2.48 Although many of its historic buildings were extensively damaged or destroyed during the Second World War (1939-45), parts of the rebuilt Plymouth City Centre have considerable significance as a prime example of twentieth century design. The city centre plan, with its symmetrical axial boulevards is one of the last examples of
Beaux-Arts town planning. Plymouth has importance within the history of post-war reconstruction, as it was developed using a modular grid and an axial arrangement - and the reconstruction process was led by the key figure of Sir John Abercrombie.

2.49 At a local level, the rebuilding of the city centre is of great significance historically and socially, and it has shaped the character and appearance of the city today.

2.50 The architectural interest of the City Centre focuses predominantly on Royal Parade, Derry’s Cross, St. Andrew’s Cross and Old Town Street. Local Building historian Jeremy Gould also argues that buildings such as Pearl Assurance House, Dingles, and the former National Provincial Bank, are nationally significant examples of 1950’s and 1960’s architecture.

2.51 In defining its character and appearance, the existing City Centre is very much that proposed in the ‘Plan for Plymouth’. This is most evident in the arrangement of streets and land uses, which are based on what was envisaged, notably the axial arrangement of Armada Way, Royal Parade, and New George Street. The surviving building line, along these streets together with the wide ‘boulevards,’ are considered positive assets to be preserved, as are the principal views arising from the planned form. As a basis for the protection and improvement of the best parts of the existing centre, guiding principles and policies were set out in the City Centre Urban Design Framework, to include these aspects of the surviving plan.

2.52 Some aspects of the public realm are very strong and positive, particularly the re-landscaped part of Armada Way immediately north of Royal Parade, the tree lined southern side of Royal Parade, and the Jellicoe-designed civic square.

2.53 The Plymouth City Centre Precinct Urban Design Framework (2001) identifies a number of key issues for the City Centre:

- Over emphasis on shopping and day time uses
- Physical and psychological barriers to pedestrian movement & the poor relations with surrounding neighbourhoods and university
- General decline in quality of shop fronts
- Monotony of parts of town scape causes problems with legibility, and lack of inspiration ( ie few landmarks or reference points)
- Large block sizes exacerbate permeability problems
- Buildings are too low compared to the width of its streets
- Links with Railway Station are very weak
- Railway & Bus station are poor gateways / points of arrival
- Poor weather protection / street comfort

2.54 The Plymouth's Strategic Flood Risk Assessment identifies that there is a potential long-term risk of flooding in some parts of the City Centre if mitigation measures are not put in place in Millbay.
Minimise consumption of natural resources

2.55 The Plymouth LDF Core Strategy makes the following commitments:

- ‘... work towards carbon neutrality by minimising energy consumption and providing for renewable energy’.
- Reducing the consumption of non-renewable sources e.g. fossil fuels, land, soil, and minerals in line with national and regional targets.
- Ensuring that all major new developments incorporate onsite renewable energy production equipment to off-set at least 10% of predicted carbon emissions for the period up to 2010, rising to 15% for the period 2010-2016.

2.56 Since the publication of the Core Strategy, government has published Building a Greener Future (which requires all new homes to be carbon neutral by 2016) and the Climate Change Supplement to PPS1. These policy initiatives place responsibility on local authorities to look for opportunities to plan low / zero carbon developments through the investigation of area wide energy networks.

2.57 There is currently no significant renewable energy generation in the AAP area. The scale of redevelopment aspirations and land ownership patterns within the city centre means that potential to integrate area wide low carbon solutions to energy generation is significant.

2.58 Royal Parade, Cobourg Street and Western Approach all have high air pollution levels generated by vehicles. It is expected that parts, if not all, of the City Centre will be declared an Air Quality Management Area (AQMA) in the near future, due to nitrogen dioxide levels being above the National Air Quality threshold. The growth and development planned for the wider Plymouth area over the next 20 years, and the associated increase in traffic levels, could further worsen that air quality. The proposed change in building size and scale could have a further negative impact on air quality if it causes a canyon effect - already experienced at Mutley Plain.

2.59 As the AAP area would be a significant potential generator of waste, the AAP needs to ensure that the objective of waste minimisation is integrated into proposed development, both as part of the redevelopment as well as in terms of the City Centre's future operation.
3 Appraisal of the City Centre AAP

3.1 Sustainability Appraisal is an iterative process about improving a plan's ability to deliver sustainable development. SA will therefore be an ongoing part of the process of forming the Area Action Plan. In order to document this process there is a need to break this learning into a number of discrete tasks. At this stage in the AAP's development the tasks are:

- Test the AAP's Objectives against the SA Framework
- Test the AAP's 'options' against the SA Framework.

3.2 The purpose of these tests and the associated commentary generated in this report is to predict and evaluate the effects of these objectives and options, and to ask the following questions:

- Could these effects be of special significance?
- Are there ways of reducing or mitigating adverse effects?
- Can any beneficial effects be further enhanced by positive planning?

Testing Plan Objectives

3.3 The purpose of this stage of the SA process is to pose a number of questions about the AAP's Objectives:

- Do the AAP's objectives provide a sustainable basis for developing options and reflect the key sustainable development issues set out in the SA Framework?
3.4 The planning vision for the City Centre is set out in Plymouth's Adopted LDF Core Strategy: This provides the agreed framework within which the AAP must be developed.

To reinforce the City Centre's role as a vibrant and thriving regional destination, providing high quality shopping, recreation, culture, civic, education and commercial facilities, well connected to surrounding neighbourhoods, as well as being a safe place of quality in which to live.

The Council's objectives to deliver this vision are to:

- diversify the current functions of the City Centre to give it more life outside shopping hours, including intensification of residential, office, and cultural uses, including, where appropriate, the introduction of tall buildings.
- significantly intensify the central area to include taller buildings at key locations, and offer visitors and residents a 24-hour life.
- identify a central office core within the City Centre in conjunction with the redevelopment of Millbay.
- provide some quieter areas with enough activity at all times to make it feel safe.
- attract specialised shops, pubs, entertainment and culture.
- ensure connections with adjacent areas are strong, direct and meaningful.
- positively integrate and reinforce the role of the University and the Cultural Quarter as vibrant and strong parts of the City Centre.
- create a more urban environment in the University area through developments which give a better sense of enclosure to the streets.
- enrich the quality of the environment in the City Centre, so that the public areas are clean, safe, accessible and attractive.
- seek opportunities to create better pedestrian permeability north south through the City Centre blocks and ensure that new developments seek to improve the legibility of the City Centre so that everyone can easily find their way around.
- consider the heritage value of the City Centre and University areas as part of its regeneration.
- selectively introduce traffic back into parts of the City Centre.

3.5 A preliminary SA was prepared as part of the development of the Issues and Options document for the City Centre AAP in February 2005. The vision and objectives for the City Centre AAP were also appraised as part of their inclusion within the submission version of Plymouth's LDF Core Strategy (July 2005), and this appraisal has been refreshed in light of the 2008 revision of SA Scoping report.

3.6 The July 2005 work found the vision & objectives for the City Centre Area Action Plan to be broadly sustainable although, inevitably, some conflict of interest may arise. The issues raised were:
Will alterations to the transport infrastructure generate negative effects elsewhere, create “rat runs”, and increase traffic congestion?

Achieving sustainable urban communities is a positive approach to future planning. However in recreating and restoring residential areas it is important that the new housing stock and design of individual dwelling units meets the needs of the local community at prices they can afford. The design of buildings also needs to be sensitive to the surrounding built environment and should reflect/retain locally distinctive features.

Will the proposals to introduce sensitive design and increase pedestrian and cyclist usage, reduce crime, prostitution and improve safety or should additional/alternative solutions be explored?

Proposals to ease pedestrian movements may encourage more people to travel on foot or by cycle around the city centre and could have a positive effect on economic growth, but it is questionable as to how far proposals will go in encouraging people to switch to alternative modes of transport.

In considering plans for the development of a cultural quarter, uncertainty arises over the extent to which existing buildings will be reused and restored and what the future will be of existing green space.

Proposals to intensify development through increasing density and height will need to be designed with care in order to avoid wind funnelling, overshadowing, and visual conflicts with historic buildings and green space.

Proposals to extend activities outside shopping hours need to be carefully balanced against proposals to increase residential accommodation. Late opening hours and a possible increase in noise and rowdy behaviour may have a negative impact on local communities’ quality of life.

It is important to ensure that materials for construction are sourced locally, and that energy and waste consumption is reduced.

3.7 The refresh of this work in light of the 2008 Scoping report also concluded that the SA objectives and AAP objectives, both seek to enhance and improve the City Centre, and are therefore broadly compatible, but that the implementation of all of the elements would inevitably create some potential tensions: They key points being:

- The objective of creating a stronger and more vibrant economy in the City Centre would be very likely to increase the use of natural resources, particularly energy, and manufactured materials. It would also increase the demand for transport services of all types. The AAP must take account of this potential outcome by ensuring that all available and practical means are employed to reduce waste, increase resource efficiency, and uptake of renewable energy solutions.
• Tension between conservation of historic assets and the need for redevelopment to achieve increased diversity and intensification, as well as meeting current shopping & service infrastructure requirements.
• The SA objectives aimed at encouraging the minimisation of demand and the promotion of sustainable transport modes could directly conflict with the reintroduction of vehicles to existing car-free zones. The presence of traffic and parking in shopping and employment areas will discourage the take-up of public transport and discourage walking and cycling for those purposes.
• There is also tension within the competing alternative sustainable modes, in that greater pedestrian priority can impact on public transport journey times, and cyclists and pedestrians are sometimes uncomfortable fellow travellers in busier thoroughfares.
• The selective reintroduction of traffic seeks, in part, to enhance street safety through increased activity, particularly during the evening. However, it also has the potential to reduce road safety, damage air quality and lead to an increase in vehicle-related crime.

3.8 The SA recommendation is that these issues be considered in the refinement of strategic options and the development of policy / proposals.
Testing the AAP - Strategic Approach

3.9 There are a number strategic, policy and site based options and alternatives for delivering the planning vision for the City Centre. The City Centre & University AAP Consultation document sets out potential strategic approaches along which the AAP could develop, plus six preferred key ingredients. The role of the SA at this stage is to:

- appraise how these options perform in relation to the SA Framework;
- to facilitate a comparison of how they perform in relation to each other;
- to help provide an objective documentation of the journey of travel towards the preferred approach;
- and to make recommendations about modifications or additions to the options being considered.

3.10 In delivering these four elements this SA aims to, provide a transparent evaluation of the pros and cons of the various options that have been considered, and to identify any additional options or consideration that would could improve the emerging strategy’s ability to deliver Sustainable Development.

3.11 This section of the SA presents a commentary / response to Part 4 of the City Centre and University AAP Consultation document and presents this commentary against the range of Strategic Approaches that have been considered to date. These are presented under the following sub headings:

- The do nothing option
- A sustainable City Centre strategy
- A two-centred, bi-polar city
- Flood risk options
- Heritage driven regeneration
- Development driven regeneration
- Regeneration led by sustainable transport options
- Low carbon alternatives
- Low retail growth option

Strategic Approach 1: The Do Nothing Option

3.12 The first option considered in the development of the AAP is the do nothing option. This option would imply that the Local Development Framework does not put in place a strategy for change and regeneration, and does not pro actively attempt to create remedies for some of the issues which have been identified. In practical terms, this might mean that an AAP is not produced for the City Centre.

3.13 However, the lack of a City Centre strategy would have implications for sustainable development across Plymouth, not just the centre. The Core Strategy and Sustainable Communities Strategy still assume that the population of the City will expand to 300,000 by 2021. Therefore to deliver the SA objective for supporting communities that meet peoples needs there is a need to ensure this growing
population is provided with the full range of services and facilities. A failure to plan for this extra demand for retail floor space in the most sustainable locations (ie the City Centre), would potentially generate negative impacts on SA objectives for A well connected city, for minimise the consumption of natural resources, and maintaining and enhancing the city’s natural & built environment because:

- The lack of a strategy to meet this growing demand would mean development pressure for substantial amounts of out of centre retail floorspace would be hard to resist,
- More people would choose to shop at alternative locations, for example Truro, Exeter and even Bristol. This would lead to long distance trips, most likely made by car, which would create unsustainable travel patterns as a result of the growth of Plymouth.

3.14 At a more local scale the clear implication of a ‘Do Nothing’ option is that the key sustainability issues identified as characterising Plymouth’s City Centre retail economy would not be addressed. In real terms this would not mean that the City Centre continues to function and ‘tick along’ as it has done. It would mean that the City Centre declines, both in comparison to neighbouring, competing centres, and in respect of the range of services and attractions it offers to the people of Plymouth and the subregion. This scenario would generate negative outcomes for SA objectives for supporting communities that meet peoples needs, a diverse and thriving economy, and maintaining and enhancing the city’s natural & built environment because:

- Any investment taking place would not be guided by a Strategy which could ensure that maximum sustainability benefits for the City Centre were gained by the form and location of new development.
- The poor distribution of anchors across the City Centre would remain as it is today. This, combined with the large geographical size of the City Centre, would mean that the focus of retail activity is pulled more and more to the east of Armada Way, leading to further decline of the West End and the market.
- Unit sizes in Plymouth would remain too small to meet the current demand from retailers, making it difficult for these retailers to invest in the City Centre. Plymouth City Centre would therefore find it increasingly difficult to attract the commercial investment it requires.
- The poor quality of some buildings in the City Centre would not be addressed in a cohesive way, and there would be less potential to pro-actively address the conservation of built heritage assets.

SA Recommendation: The City Centre & University Area Action Plan has a key role to play in the sustainable development of the City Centre and wider Plymouth sub region.
Strategic Approach 2: A Sustainable City Centre Strategy

3.15 The aspiration to ensure that the strategy retains the 'Golden Thread' of contributing positively to the delivery of sustainable communities is an approach strongly supported and advocated by this appraisal. Many of the SA Objectives have strong parallels with those expressed in the LDF Core Strategy objectives for the Building of Sustainable Linked Communities, and therefore this approach to options for developing the strategy is endorsed. The weakness to this 'golden thread' is its failure to respond to the principle of 'Living within Environmental Limits'. The sustainable linked communities policy within the Core Strategy makes no reference to environmental limits, (because they are covered by other Core Strategy objectives and policy).

3.16 The SA recommends that the golden thread for the AAP is broader than just the Core Strategy objective for sustainable linked communities and that the golden thread should be amended to include a more rounded definition of sustainable development and specifically the inclusion of the principle of environmental limits.

3.17 This SA supports this 'golden thread' approach because it can help to understand and balance many of the strategic options faced in the production of the City Centre & University Area Action Plan. The City Centre is a unique form of sustainable neighbourhood, in which many of the challenges and issues for delivering sustainable development occur from the tension between the city centre potential function/role as a regionally significant centre and its potential role/function as a local neighbourhood where people live, and where communities thrive.

3.18 An example of this tension is the debate about the AAP's direction in relation to the following issues:

- The need to set a framework that provides a commercially attractive investment opportunity to large retailing organisations that can provide the commercial injections required to generate a sustained change in the city's retail economy,
- Against the need to support strategic measures that support SME's, create a culture of local enterprise, and generate markets for local goods and services.

3.19 There is a strong case to be made that both approaches support the SA objective for 'a diverse and thriving economy that meets peoples need', but the definition of need is difficult to interpret for a city centre that aspires to function as a local neighbourhood, a city centre and 'the economic hub of the far south west'.

3.20 These strategic options do not need to be mutually exclusive, but there is a risk that the natural gravity associated with large scale city centre redevelopment options could overshadow or preclude interventions focused around more bottom up measures to support the local economy.
3.21 These complex characteristics reinforce the need for a strategy that retains a strong golden sustainability thread to ensure that the AAP continues to deliver the required balancing act.

**SA Recommendation:** Golden thread approach is strengthened to include the principle of environmental limits. The golden thread approach should be given greater weight in the shaping the preferred strategy for City Centre to ensure that all proposals a directly linked back to this central theme. For the City Centre this is likely to mean a strategy that gives more emphasis to initiatives that promote low carbon approaches, and address the areas’ growing air quality issues.

**Strategic Approach 3: A two-centred, bi-polar city**

3.22 The Plymouth Shopping Study (2006) identify the need for significant increases in the levels of retail provision to ensure the city has the range of services to provide for the anticipated growth in population and to ensure that it presents an attractive proposition for the inward investment in the employment sectors identified in the Local Economic Strategy.

3.23 There are different ways in which this increase in retail space / employment space could be geographically accommodated. The option of developing a city with two centres has been considered as a part of the the development of the LDF Core Strategy and this AAP. These options explored the potential to develop a second centre in northern Plymouth, and therefore focus a large proportion of new development in the City's Northern Corridor. This option would lead to a substantial reduction in the levels of retail and employment space allocated in the city centre.

3.24 This option scores poorly against the SA objective for *A well connected city that meets peoples needs for access to services with least damage to the communities and the environment.* Whilst a new centre in northern Plymouth could increase access to services for residents in neighbourhoods to north of the city, the scale of additional commercial development implied by the bipolar city option would probably generate direct competition for services currently provided by the city centre. The likely impact would therefore be an increased desire, and/ or need for travel between the two centres, particularly for comparison retailing. Given the substantive public transport infrastructure that already exists around the city centre, there is also a likelihood that this ‘out of centre’ option, would generate an increase in car based trips.

3.25 The SA also identifies concerns about how a bipolar city would support SA objectives for *A diverse and thriving economy that meets peoples needs*. These concerns are based around the probability that this option would increase the need to travel and therefore potentially increase the vulnerability of the city's economy to climate change, but more substantially around the opportunity cost of spreading the
commercial investment across 2 different areas. Chapter 3 identifies a number of very significant structural issues associated with the city centres physical form and economic characteristics. To address these problems Cushman & Wakefield (2008) state that substantial investment is required to deliver a sustained change in the status quo, and that large scale retail led development at Derriford could compromise deliver of City Centre objectives.

SA Recommendation: That a proposal for a bipolar city has significant flaws when tested against SA Objectives, and that council is correct in focusing on the City Centre as the place where the main new retail developments should be concentrated. To achieve sustainable communities at a local scale, additional retail service provision will be required in the northern corridor, but the quantum's associated with this should be restricted so as not to compromise plans for the City Centre's regeneration.

Strategic Approach 4: Flood risk options

3.26 PCC Strategic Flood Risk Assessments identified that due to sea level rise parts of the City Centre could be subject to significant tidal flooding in the period after 2050. The areas within the AAP with the most potential to be affected were the transport infrastructure around Western Approach / Union Street, and the developments around Toy R US, and Colin Campbell Court.

3.27 Development within areas at risk of flooding perform badly against the SA appraisal criteria Avoid areas of high flood risk, and for the SA broader objective around Improving Health Well being and Community Safety. However the risks associated with tidal over topping at Millbay have been addressed through the proposals, and subsequent planning application brought forward through the Millbay & Stonehouse Area Action Plan, and these developments, once in place, will provide protection for the City Centre.

3.28 However the tidal inundation is not the only source of flooding. The low lying nature of the areas noted above means that they are also at risk to flooding generated by surface water drainage issues. Low lying locations around Plymouth suffer from localised flooding associated with surface drainage networking being 'locked' at high tide (ie there is nowhere for the water to drain to). This problem will be exacerbated by sea level rise and the increased intensity of rainfall that is expected in association
with climate change. Data gaps exist in relation to understanding current capacity of surface water drainage system, and where the key areas of future risk are, this knowledge needs to be expanded as part of development proposals.

**SA recommendation:** Flood risk does not represent a strategic constraint to sustainable development within the City Centre, in that it has been mitigated by proposed developments at Millbay. But improvements to essential drainage infrastructure may be required for development proposals around the junction of Union St and Western Approach to ensure regeneration is future proofed against flood hazards caused by tide locking.

### Strategic Approach 5: Heritage Driven, or Development Driven Regeneration

3.29 The tension between the strategic options that the AAP could take in its approach to conserving the city centre’s built heritage against the options for creating a relatively unconstrained investment climate for large retail interests is a significant undercurrent through the AAP consultation document. The evidence base on the City Centre’s heritage assets come to significantly different conclusions of the benefit on different elements of the city’s built form to the regeneration agenda.

3.30 This tension is expressed as two opposing options in the AAP consultation document. Heritage driven Regeneration, or Development driven Regeneration.

3.31 A strategy that prioritised heritage driven regeneration could be based on the designation of a Conservation Area for the City Centre, and the consideration of specific buildings for statutory listing. This approach would strongly support SA appraisal criteria *Maintain & enhance historical buildings and structures*, and by endorsing the built heritage role in supporting local distinctiveness could play a positive role in creating a *high quality urban environment with highest possible standards of urban design*. By reducing the need for demolition & rebuild and focusing on retention & reuse, such a strategy could also score high against SA Objective for *minimise the consumption of natural resources*, as long as satisfactory ways of increasing their energy and water efficiency could be retrofitted.

3.32 A focus on heritage conservation would be a potential constraint on the scale and nature of the redevelopment opportunities and aspirations for certain parts of the city centre. If the scale of additional retail floor space set out in the LDF Core Strategy and supported by Plymouth Shopping Study (2006)& Cushman & Wakefield (2008) is what is required to provide the level of retail services that a growing city needs, then this primary requirement must be met without generating an increased need for travel i.e shopping at Exeter or Truro. Therefore a strategy that is focused on heritage conservation within the locality of the city centre, would generate significant impacts at a city wide scale in relation to SA Objectives for *peoples need for access to services with least damage to the environment*, and *supporting communities and neighbourhoods that meet peoples needs.*
3.33 The counter position set out in the AAP consultation document is a strategy focused on development led regeneration. This is tabled as a polar opposite to an approach that embraces heritage characteristics. This option would respond strongly to commercial interests and would likely result in a significant reduction in the constraints placed on investors wishing to bring forward development proposals to ensure that the headline objective delivering the growth in retail floor space was achieved, within the desired timetable.

3.34 Given the concerns noted above about the potential negative impacts for the city's sustainable growth of a heritage led approach, a case could be made for a strategic approach that lifts these kinds of constraints. However when consider against all the SA objectives there is little else to recommend a planning approach that reduces the checks and balances that exist to minimise the impacts of development and support the delivery of potential wider community benefits. Whilst there will be confidence drawn from 'enterprise zones' that this approach will deliver the growth agenda there is little evidence or confidence that this will approach will deliver it in a manner compatible with the AAP’s Golden Thread or the SA objectives for health / well being, provision of community needs for housing or services, sustainable transport and access, or protecting the built environment.

SA Recommendation: This SA clearly recommends that neither extreme provides a sustainable footing for the City Centre or Plymouth as a whole. The priority heritage assets need to be conserved on a clear understanding of their merit. Their conservation should be debated in the light of a wider understanding of the commercial pressures that will be key in providing local services for Plymouth’s sustainable growth.

Strategic Approach 6: Regeneration led by sustainable transport options

3.35 A transport strategy for the city centre that prioritises, and sets a vision for access to the city centre by sustainable modes is clearly desirable at one level, and completely compatible with the SA objective for A well connected city that meets peoples needs of services with least damage to communities and the environment. It would also score highly against SA criteria for improving health and healthy lifestyles. However in common with the commentary above about the approach to heritage conservation there is a risk that a strategy too heavily focused, in the short term, on sustainable transport solutions could act as a disincentive to the required private sector investors. This in turn would lead to the City Centre potentially performing poorly against its ability to provide the services that a sustainable city requires, and generating a perverse outcome of increasing car based trips to alternative venues such as Exeter.

3.36 Unsurprisingly, to achieve sustainable development, the AAP needs to strike a balance. But this balancing act can only be delivered through the provision of a vision/strategy for sustainable transport within the City Centre that the AAP can the
help to deliver. The Cushman & Wakefield (2008) report clearly articulates an approach / vision for future redevelopment in parts of the City Centre. Whilst section 7.1.2 makes positive noises about the value of an accessible city centre, and the role pedestrians cyclist & public transport have to play in this mix, it also articulates a compelling case for access by car (Plymouth currently has a lower car park / retail floor space ratio than other comparable cities). The lack of this sustainable transport vision means that the required trade offs between the commercial requirements of current and future investors, and the longer term aspirations for sustainable transport infrastructure, cannot be debated equitably. This is a significant gap in the required understanding, and if left unaddressed would generate negative outcomes for SA objectives for health, access, and resource consumption.

SA Recommendations: The AAP should not be led solely by sustainable transport options, but it must be informed by a vision and strategy for sustainable transport that provides a clear statement as to what those options are, and that matches the timescale and ambitions being expressed for regeneration and redevelopment. Additional work should be progressed as a priority to:

- Better articulate the role of pedestrian and cyclist in future movement patterns within the city centre, but also as the primary method of movement from surrounding neighbourhoods
- Take account of the change in transport use in the City Centre which will take place in the coming decades as a result of a response to climate change, to allow this flexibility to be built into the AAP
- Identify preferred locations for public transport routes and provision of attractive multi-modal transport hubs
- Set an aspiration for the level of mode split all new development should be seeking, and provide parameters for all future pedestrian and vehicular movement modelling.
- Recognise the challenges faced by the inner ring road and identify where vehicular capacity of current road network could be compromised to accommodate improvements for pedestrians, cyclists and public transport.
- To explore a low emissions approach to transport, to future proof transport solutions against already anticipated air quality issues
- To identify the most sustainable locations for car parking

Strategic Approach 7: Low Carbon Options

3.37 The recognised need to shift towards a low carbon economy could provide a number of discrete strategic options for the AAP’s ability to generate reduction in the city’s carbon footprint. These are

- Sustainable transport (see points above)
• Low carbon / renewable energy solutions
• Low carbon approaches to retailing consumption of goods & services

3.38 The scale and character of redevelopment proposed for Cornwall Street, and the northern Triangle provides opportunity for the AAP to set parameters of how these could reduce the vulnerability of the economy to climate change, and minimise the consumption of non renewable resources.

3.39 The Government has announced that all new homes in England and Wales must be zero carbon by 2016, and there are similar ambitions to cut carbon emissions from new non-domestic buildings by 2019. These targets are to be delivered through a phased increase in Building Regulations. However the Government has also identified that the planning system has a key role to play in supporting the delivery of this timetable for reducing carbon emissions from domestic and non-domestic buildings.

3.40 The scale and characteristics of developments and redevelopments at the City Centre have a significant and potentially complementary demand for energy that may provide the opportunity for energy solutions at a scale that would not be viable if each part of the site was considered separately. The development of an integrated low / zero carbon energy strategy for these developments as a whole, therefore has the potential to deliver significant additional CO₂ savings, and reduce the level of cost to the developer, and future occupants / residents. Understanding about the practicalities of delivering area wide solutions to low carbon development is growing. This learning needs to be applied within the Plymouth development context to explore its suitability / viability and the output included in emerging proposals of this AAP.

3.41 The City Centre AAP could also set out a pathway towards a low carbon economy based around an approach that sought to reduce / minimise consumption. The high levels of consumption that most developed nations are characterised by are intrinsically linked to our high carbon lifestyles. Against this backdrop, a strategy that sets out a redevelopment agenda focused largely around retail expansion could potentially score poorly against SA objectives for resource use.

3.42 Retailing is responsible for 2.5 % of the UK's Carbon Dioxide emissions (ONS, 2007) and will have a significant influence over a low carbon society and its economy through its marketing, regular customer transactions and globalised supply chains. There is a therefore a concern that significant increases in retail floor space will have further unsustainable patterns of consumption and resource use. However unless low carbon living rewrites the book about the nature of society and the need for exchange there is likely to be continuing need for retailing.

3.43 Forum for the Futures (2007) Retail futures - Scenarios for the future of UK retail and sustainable development, identifies that retail has a vital role to play in delivering sustainable development. It employs 2.9 million people and generates almost 6% of GDP. The scenarios explored within this work highlight the significant uncertainty that climate change, new energy systems, resource scarcity amongst others generate for the retail industry.
3.44 Low carbon economies will need to thrive on products / services that are low carbon and are manufactured from renewable resources. It is currently unclear what this will do to patterns of consumption. As no established models for what retailing in a low carbon economy will look like, the only reasonable approach is for the AAP to be progressed on best available evidence / trend data about past patterns, and ensure that sufficient flexibility is built into proposals to accommodate future change. Cushman & Wakefield (2008) work upon which the AAP is evidenced is based on industry’s standard trend data and builds in significant flexibility to accommodate for shifts in patterns of retailing ie economic down turns / recession, shift to internet shopping. Retail markets and potential spatial plans will need to respond to changes in patterns in retailing driven by the climate change agenda, but it is not the role of the AAP to second guess these in relation to how much additional floor space the city will require.

SA recommendation: Low Carbon options should be given significantly more consideration within the strategic direction of the AAP. Reduction of carbon emissions in line with Plymouth’s Local Area Agreement target should be included as an objective for the plan. The AAP can then maximise its potential as a vehicle for delivering against this target by focusing on interventions around the proposed transport strategy for the City Centre, and an integrated approach to low carbon energy solutions.

Strategic Approach 8: Low Retail Growth Option

3.45 The Cushman & Wakefield’s (2008) City Centre Future Direction Investment Development Framework explores some options around smaller quantum’s of retail development in the City Centre. It concludes that these smaller amounts of retail floorspace would provide less scope to provide solutions to the main issues in the City Centre. If these issues are not addressed, a ‘low retail floor space increase’ option would in fact be similar to the ‘Do Nothing’ option discussed under Strategic Approach 1. This would therefore raise similar concerns in relation to delivery of SA Objectives.
Testing the AAP - Preferred Key Ingredients

3.46 This section of the SA presents a commentary / response to Part 5 of the City Centre and University AAP Consultation document and presents this commentary against each of the Preferred Key Ingredients that have been identified:

- Quarters Plan
- Large retail led redevelopment
- Historic Environment
- Transport & Movement principles
- Design & Public realm
- The West End

Key Ingredient 1: Quarters Plan

3.48 The proposal for a Quarters plan contributes positives for a broad range of the SA Objectives. At a high level it indicates the potential to increase the range / diversity of services offered within the city centre and therefore play a role in making Plymouth a more attractive destination for investors that can help stimulate the sectors identified in the Local Economic Strategy. It can play a key role in delivering a higher quality of urban design for the city centre and bring a diversity of street scape that will help objectives for sustainable movement by providing points of reference and making the centre more legible for pedestrian users.

3.49 The detail indicated on page 28 is that this Quarters Plan could encompass a raised profile for the pannier market as a focus for local food retailing. This is a significant plus point for SA objective for health and for SA criteria encouraging local enterprise and markets for local goods / services.

SA Recommendation: SA supports principle of quarters approach. Detail of delivery of quarters plan needs to hold strong to the sustainable communities golden thread and the importance of maintaining a mix of uses within the quarters to avoid impacts of land use zoning. Need to ensure sufficient emphasis is placed in relevant zones for unit sizes that further the enterprise culture within the city and support business start up.
Key Ingredient 2: Large retail led development

3.50 The proposals support SA objective for providing Plymouth with the services it needs and sets out to pro actively tackle the core structural issues around the city centre’s retailing dynamics.

3.51 A healthy and vibrant city centre will help deliver Plymouth’s Local Economic Strategy aspirations by increasing Plymouth’s attractiveness offer for inward investors and future job seekers within the targeted sectors and therefore can help deliver against the SA objective for *A diverse and thriving economy that meets peoples needs*. Given the scale of inward investment this proposal will require, the sustainability of this ingredient of the AAP could be significantly enhanced by these proposals being developed along side a strong commitment to measures such as Local Labour Agreement that could assist in the development of a skilled workforce, and measures that could increase business start up.

3.52 The scale and character of redevelopment made possible by the AAP provide opportunities for the plan to set parameters as to how it could reduce the vulnerability of the economy to climate change, and minimise the consumption of non renewable resources.

3.53 The Government has announced that all new homes in England and Wales must be zero carbon by 2016, and there are similar ambitions to cut carbon emissions from new non-domestic buildings by 2019. These targets are to be delivered through a phased increase in Building regulations. The Government has also identified that the planning system has a key role to play in support the delivery of this timetable for reducing carbon emissions from domestic and non-domestic buildings.

3.54 The scale and characteristics of developments and redevelopments at the City Centre have a significant, and potentially complementary demands for energy that may provide the opportunity for energy solutions at a scale that would not be viable if each part of the site was considered separately. The development of an integrated low / zero carbon energy strategy for these developments as a whole therefore has the potential to deliver significant additional CO₂ savings, and reduce the level of cost to the developer, and future occupants / residents.

3.55 Whilst this proposal primarily deals with retail led redevelopment it also tables the proposal of significant residential units. To achieve the SA objective *support communities & neighbourhoods that meet peoples needs and reduce the need to travel* there is a need to ensure that this ingredient of the AAP is developed alongside proposals for provision of a range of services that new residential community will require.

SA recommendation: Evolution of policies and proposals around this ingredient of the AAP need to include commitments to Local Labour Agreement, integrate low carbon energy solutions, and consider mix of uses needed for new residential community.
Key Ingredient 3: Historic Environment

3.56 This proposal scores strongly against SA criteria for *Maintain and enhance historical building of acknowledge importance*. The various built heritage assets within the city centre have been the subject of significant analysis relating to their merit and the best mechanism for ensuring their conservation. This ingredient of the draft AAP is based on the results of that analysis, and would therefore appear to be a well evidenced step toward the SA objective for maintaining & enhancing the built environment.

3.57 There is a potential tension between this ingredient and SA Objective for *Minimise the consumption of natural resources*. The city’s existing built stock provides one of the most significant challenges to the reduction of carbon emissions. Therefore the identification of specific heritage assets, that will form a long lasting part of the centre’s built form need to be accompanied by positive policies that pro actively require the retrofit of energy efficiency and renewable or low carbon energy solutions.

**SA Recommendation:** Develop policy approach that supports the retrofit of energy efficiency and renewable or low carbon energy solutions as part of renovation / refurbishment of key heritage assets

Key Ingredient 4: Transport and Movement Principles

3.58 In line with the SA commentary provided in preceding sections of this document, it would appear that this element of the strategy is significantly less developed than other key ingredients. Given that sustainable patterns of movement must be central to the AAP’s approach to delivering *A well connected city that meets people needs for for access to services / places with least damage*, this area needs to be prioritised for additional work.

3.59 The transport principles articulated in the strategy build on the evidenced need to ensure that the City Centre provides an attractive option for the investors who can assist in the delivery of the required retail expansion and diversification of uses. Given the debate articulated under the section on strategic options, this is an approach that is consistent with some aspects of the city’s sustainable development, but is weakened by the lack of a comparable vision & objectives for what is required to deliver sustainable patterns of movement.

3.60 This ingredient could significantly improve its contributions to delivering *A well connected city that meets people needs for for access to services / places with least damage* by balancing its pragmatic approach to short term requirements for car parking / and maintaining road capacity for vehicle movements, with longer term measures that:
Articulate and reinforce the role of pedestrian and cyclist in future movement patterns, both within the city centre, but also as a primary method of movement in from surrounding neighbourhoods.

Take account of the change in transport use in the City Centre which will take place in the coming decades as a result of a response to climate change, to allow this flexibility to be built into the AAP.

Identify preferred locations for public transport routes and provision of multi-modal transport hubs.

Set an aspiration for the level of mode split new developments should be seeking, and provide parameters for all future pedestrian and vehicular movement modelling.

Explore a low emissions approach to future proof transport solutions against already anticipated air quality issues.

Identify the most sustainable locations for car parking.

3.61 These measure would significantly increase the way in which this ingredient of the strategy performs against all three SA criteria related to transport. They could also make a positive contribution to Improving health & supporting healthy lifestyles.

SA Recommendation: Principles need to be rebalanced in terms of a vision for pedestrian, cycle and public transport movements.

Key Ingredient 5: Design and Public Realm

3.62 The principles expressed are broadly in line with a number of SA Objectives around health, local service provision, accessibility & enhancing the built environment. It would be beneficial to SA objective for minimising natural resource use, and the criteria for reducing the vulnerability of the economy to climate change, if the principles around design quality are broadened to encompass the issues around sustainable construction and energy supply. Future critiques about the legacy of quality design left by this period of regeneration & redevelopment within the city will focus on the ability to embrace the required resource efficiency agenda. This agenda needs to placed at the heart of the aspirations for a quality city.

SA Recommendation: Integrate sustainable construction into approach towards delivery of design quality

Key Ingredient 6: The West End

3.63 The principle of reinforcing and enhancing the role of the West End as the focus for small independent retailing, with the Pannier Market as a focus for local food retailing, could make a strong positive contribution to SA Objectives for Health,
and Economy. Whilst being covered by higher level policies within the LDF Core Strategy, explicit reference to the heritage merits of the Pannier market could help reinforce the role of built heritage in the regeneration of this area.

**SA Recommendation: Ensure development raises profile of heritage value of Pannier Market**
4 Conclusions

4.1 This SA recognises that City Centre & University Area Action Plan has a significant role to play in the sustainable development of the City Centre, and the wider Plymouth sub region.

4.2 The SA has explored the pros & cons of a number of the strategic options for the future development of the Area Action Plan. This analysis results in a number of recommendations which are summarised below.

- The approach to ensuring sustainable communities is the cross cutting theme throughout the strategy and should be strengthened and widened to include the principle of environmental limits. For the City Centre this is likely to mean a strategy that gives more emphasis to policy and proposals that promote low carbon approaches, and address the growing air quality issues.
- Improvements to essential drainage infrastructure may be required for development proposals around junction of Union St and Western Approach to ensure regeneration is future proofed against flood hazards caused by tide locking.
- Priority heritage assets need to be conserved on a clear understanding of their merit, and their conservation debated in the light of a wider understanding of the commercial pressures that will be key in providing local services for Plymouth's sustainable growth.
- The AAP must be informed by a vision and strategy for sustainable transport that provides a clear statement as to what those options are, and that matches the timescale and ambitions being expressed for regeneration and redevelopment. This work must be progressed as a priority.
- Low Carbon options should be given significantly more consideration within the strategic direction of the AAP. Reduction of carbon emissions in line with Plymouth's Local Area Agreement target should be included as an objective for the plan. The AAP can then maximise its potential as a vehicle for delivering against this target by focusing on interventions around the proposed transport strategy for city centre, and an integrated approach to low carbon energy solutions.

4.3 The SA has considered each of the Preferred Key Ingredients identified in Part 5 of the City Centre & University AAP Issues & Preferred Options Consultation document, and made the following recommendations:

- Detail of delivery of quarters plan needs to hold strong to the sustainable communities golden thread and the importance of maintaining a mix of uses within the quarters to avoid impacts of land use zoning. Need to ensure sufficient emphasis placed in relevant zones for unit sizes that further the enterprise culture within the city and support business start up.
- Evolution of policies and proposals around large retail led redevelopment need to include strong commitments to Local Labour Agreements; the integration of
low carbon energy solutions, and the consideration of the broad mix of uses needed for proposed new residential community

- The development of a policy approach that requires the retrofit of energy efficiency and renewable or low carbon energy solutions as part of renovation/refurbishment of key heritage assets
- Sustainable movement principles need to be rebalanced in terms of a stronger vision and objectives for pedestrian, cycle and public transport movements.
- There is a need to integrate sustainable construction benchmarks as a key criteria for assessing delivery of quality design within the City Centre
# 5 Appendices


<table>
<thead>
<tr>
<th>High Level Objective</th>
<th>Appraisal Criteria: Does the policy or proposal..?</th>
<th>Explanation of the appraisal criteria (where not obvious)</th>
<th>As indicators of progress towards these objectives the Sustainability Appraisal will look for....</th>
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<tbody>
<tr>
<td>1. Improve health, well being, and community safety</td>
<td>1.1 Improve health &amp; support healthy lifestyles</td>
<td>Measures that will reduce physical &amp; mental illness, and improve safety. Sedentary lifestyles and lack of routine basic exercise are one of the main threats to health.</td>
<td>Development that contributes to positive well being through pleasant surroundings living conditions, access to natural greenspace, freedom from noise &amp; pollution etc. Development that proactively reduces risks associated with known safety hazards ie. road safety, blast zones, tombstoning. Patterns of development that promote active lifestyles ie. where walking &amp; cycling are made attractive as routine forms of transport.</td>
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<td>1.2 Reduce health inequalities</td>
<td>Where you live or your level of income (or other disadvantage) should not increase exposure to health risks or reduce access to a healthy lifestyle.</td>
<td>Development proposals that proactively address existing health inequalities through measures that seek to improve the provision of health care services, address current causes of poor health.</td>
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<td>1.3 Reduce anti social behaviour, crime and fear of crime</td>
<td>Development that designs out crime, eg by providing passive surveillance &amp; avoiding dead spaces and times. Proposals that incorporate design features that address existing issues associated with anti social behaviour.</td>
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<td>2. Support communities &amp; neighbourhoods that meet people's needs</td>
<td>2.1 Help provide a suitable mix of housing that is available &amp; affordable for everyone</td>
<td>Development that delivers appropriate levels of affordable housing and Lifetime Homes. Development that delivers a well-integrated mix of decent homes of different types and tenures to support a range of household sizes, ages and incomes. Development that promotes energy efficiency and affordable warmth in existing housing.</td>
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<td>Development that addresses identified deficiencies in the provision community facilities. Community facilities could include shops, GP surgery, pub, bank, place of worship, community centres, leisure or cultural facilities.</td>
<td></td>
<td>Development that addresses identified deficiencies in the provision community facilities. In providing these facilities they should be grouped to provide strongly identifiable local, neighbourhood or district centres. Cultural facilities as integral part of new development.</td>
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<tr>
<td>2.2 Supports the delivery of a full range of community facilities</td>
<td>Community facilities could include shops, GP surgery, pub, bank, place of worship, community centres, leisure or cultural facilities. Important both to equip people for economic success and for personal development.</td>
<td>Development that addresses identified deficiencies in the quality and/or accessibility of schools, colleges, libraries and training establishments. Encouragement for a diversity of choice of employment, particularly in areas of deprivation. Schools need to be encouraged to support a wider range of community facilities.</td>
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<td>Important both to equip people for economic success and for personal development.</td>
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<td>Development that addresses identified deficiencies in the quality and/or accessibility of schools, colleges, libraries and training establishments. Encouragement for a diversity of choice of employment, particularly in areas of deprivation. Schools need to be encouraged to support a wider range of community facilities.</td>
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<td>This can help to promote community strength &amp; identity and vibrancy and also reduce the need to travel.</td>
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<td>A balance between the areas economically active population and numbers of jobs. Encouragement for a diversity of choice of employment, particularly in areas of deprivation.</td>
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<td>Development proposals incorporate provision for community governance.</td>
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<td>Patterns of development that support the provision of a range publicly accessible open space / green space within walking distance of the home. Improvements to the quality of open space / greenspace facilities within walking distance of the home.</td>
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<td>Development that proactively supports the following sectors: advanced engineering, marine industries, and medical/healthcare sectors, financial / business services, creative industries, and tourism.</td>
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<td>the quantity and quality of jobs within the city.</td>
<td>There is a need to raise skill levels to enable people to take advantage of better jobs and maximise job opportunities for all. Sustainable Economic growth requires a high level of economic participation from within local communities and will necessitate targeted efforts to enable the most deprived communities to realise higher and more sustainable rates of economic activity.</td>
<td>Proactive measures to address social / economic / environmental causes of worklessness and barriers to employment. Development that provides for training of local workforce.</td>
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<td>3.2 Support the development of a skilled workforce and increase levels of economic participation</td>
<td>There is a need to increase the circulation of wealth within the city. If business spend more of their income on goods and services within the locality this increases the benefits of business activities to the city and its economic security. This contributes to community strength, cohesion and resilience, as well as reducing the transport and energy intensity of the economy. There is a need to ensure goods &amp; services are procured in a fair and ethical manner when local sourcing is not possible.</td>
<td>Promotion of local &amp; regional markets in goods and services. Business start up units, encouragement to local businesses, especially micro &amp; SMEs that adopt sustainable practices. Use of local labour and materials.</td>
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<td>3.3 Encourage local enterprise and support markets for local labour, goods &amp; services.</td>
<td>Need to harness the opportunities associated with the growing market for low carbon goods and services. Extreme weather, crop failures, water shortages at home or abroad may disrupt trade, long distance transport and availability of energy and other resources, and increase insurance liabilities. Need to ensure new employment buildings are designed to provide thermal comfort within higher summer temperatures that can be expected, without a reliance on the expense of air conditioning.</td>
<td>Economic activity that supports the development of a low carbon economy avoids unnecessary dependence on long distance trade and travel. A leisure economy that will encourage people to stay within the city, district or neighbourhood rather than go further afield. Enterprise that seeks to harness the economic opportunities that climate change will bring i.e. renewable or decentralised energy, sustainable construction.</td>
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<td>3.4 Reduce the vulnerability of the economy to climate change</td>
<td>Road traffic is the only major terrestrial source of greenhouse gas emissions still increasing, the main source of local air pollution and is regularly identified as one of the main threats to local quality of life, due to danger, noise &amp; community severance. Car dependency deepens social exclusion and adds to pressures for unsustainable land use patterns. Reliance on road links for external transport is a particular issue in Plymouth due to poor quality rail links. Air travel is a primary contributor to the causes of climate change, and it is widely recognised that demand for air travel requires management to alleviate some of the ongoing impacts.</td>
<td>Developments that reduce the need to travel, such as ensuring that people live closer to their work, and increasing access to IT facilities to promote modern communication methods that reduce car dependency. Avoid developments that generate further road traffic. Improvement of alternatives to the car e.g. public transport, video conferencing facilities. Live work units and design that facilitate home working. Proposals that improve strategic cycling and walking networks.</td>
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<td>4.2 Help everyone to access basic services easily, safely and affordably</td>
<td>Enabling people to get access to what they want in life with less travel is a win-win, reducing costs, effort and environmental damage. In order to achieve sustainable communities, the starting point should be that all facilities should be grouped together to form local and neighbourhood centres which are easily accessible, ideally on foot.</td>
<td>Distance to, and ease of accessing schools, shops, places of work and recreation.</td>
<td>Avoidance of development that will encourage air travel. Encourage a switch from transporting freight by road to rail or water through provision of improved port and rail facilities.</td>
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<td>4.3 Make public transport, cycling &amp; walking easier and more attractive</td>
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<td>Development that provides safe, attractive and direct routes for cyclists and walkers. Delivery of gaps in strategic cycle and walking networks. Patterns of development that support their use eg short distance to local services, and that improves the public transport offer. Development that contributes to delivering priorities of the Rights of Way Improvement Plan.</td>
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<td>5. Maintain &amp; enhance the quality of the city’s built &amp; natural environment</td>
<td>There is need to ensure that maintain and enhance the quality of these assets not only within our designated sites, Contact with nature is a key determinant of quality of life is essential component of sustainable communities.</td>
<td>Protection not only of designated sites but of wildlife interest everywhere. Proposals that integrate biodiversity enhancements ie wildlife friendly landscaping &amp; SUDs, green roofs, Development that proactively addresses deficiencies in the city’s Biodiversity Network to support adaptation to climate change. Proposal that increase the area of accessible natural greenspace.</td>
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<td>5.1 Protect &amp; enhance biological &amp; geological diversity</td>
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<td>5.2 Protect and enhance local landscape &amp; green space</td>
<td>Pattern and form of development that is sensitive to the qualities and functions of existing green space assets. Development that supports the long term sustainable management of green space assets. (ie recognising &amp; supporting the role of agriculture in the urban fringe.)</td>
<td>Development that ensures recreation and access is appropriately managed to ensure landscape and biodiversity is not damaged. Development that supports the delivery of the City’s Greenspace Strategy, and avoids impacts on adjoining Areas of Outstanding Natural Beauty.</td>
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<td>5.3 Avoid areas of high flood risk and reduce the vulnerability to future flooding</td>
<td>Existing &amp; new development needs to plan for increased flood risk associated with climate change. New development should seek to reduce flood risk overall.</td>
<td>Appropriate use of analysis from Strategic Flood Risk Assessment, measures to alleviate existing or potential surface water drainage problems, the incorporation of the principles of SUDs from early stage of design (master planning).</td>
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<td>5.4 Maintain and enhance historical buildings, structures, monuments and remains of acknowledged importance</td>
<td>Plans and proposals should recognise the role of the historic environment in establishing local distinctiveness and its role in regeneration, leisure, recreation and tourism. The importance of partnership working (public private and voluntary) in addressing the opportunities and challenges facing the historic environment should be recognised.</td>
<td>Development that ensures the historic environment is accessible and raise its profile, whilst ensuring access is managed do assets are not eroded. Development that protects and enhance Plymouth's historic and archaeological heritage, and value its role in regeneration.</td>
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<td>5.5 Provide for a high quality urban environment with highest possible standards of urban design</td>
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<td>Proposals which seek to deliver high quality and inclusive design solutions which improve the character and the quality of an area, and the way it functions.</td>
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<td>6. Minimise consumption of natural resources</td>
<td>6.1 Reduce non renewable energy consumption and green house gas emissions</td>
<td>Plans &amp; proposals should look for ways to design out energy use and incorporate energy efficiency measures.</td>
<td>Proposals that facilitate the incorporation of decentralised energy systems, that encourage energy efficiency and allow the use of renewable energy sources.</td>
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<td>6.2 Reduce water consumption</td>
<td>Plans and proposals should consider the impact on water supply.</td>
<td>Designs that integrate gray water recycling.</td>
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<td></td>
<td>6.3 Minimise consumption and extraction of minerals</td>
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<td>Greatest possible use of old material in new construction, provision for reuse and recycling.</td>
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</table>
As indicators of progress towards these objectives the Sustainability Appraisal will look for...

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<td>6.4 Reduce waste</td>
<td>Apply principles of waste hierarchy at a local level. Avoid the creation of waste at source. Re use, recycling, digestion and composting are better than landfill.</td>
<td>Development that encourages waste minimisation and the sustainable management of future waste streams, eg. community recycling or composting infrastructure. Reuse &amp; recycling of demolition waste.</td>
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<tr>
<td>6.5 Minimise land, water, air and light pollution</td>
<td>Projected growth in the city may cause localised air quality issues due to increases in vehicle traffic. Regeneration provides opportunity to clean up areas of contaminated land.</td>
<td>Proactive measures to address localised air quality issues.</td>
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Table 2 Plymouth LDF Sustainability Appraisal Framework
Equality Impact Assessment of City Centre Area Action Plan (Issues and Preferred Options) – November 2008

The purpose of this report is to set out the vision, objectives and suggested ‘ingredients’ in the City Centre Area Action Plan Issues and Preferred Options document and to assess these for the likely impact they will have on the six equality groups. Data collected from public consultations is used to inform this analysis and to identify the planning issues of most importance to equality groups. This Equality Impact Assessment concludes that the City Centre Area Action Plan should have positive impacts on all of the equalities groups. A number of actions are proposed to ensure that issues of concern are more fully recognised and addressed in the draft City Centre Area Action Plan.

1. Background

1.1. Context

This document represents the second stage in preparing Plymouth City Council’s City Centre Area Action Plan. It has been produced for public consultation, and builds on an earlier Issues and Options document (published March 2005). This new consultation document finalises the list of key issues which the Area Action Plan must address and also sets out the ‘key ingredients’ which the Council believes should go into the development of the strategy for the City Centre. It provides an opportunity for the public and other stakeholders to comment on these key issues and ingredients. The Equality Impact Assessment is being conducted at this stage of the process so that it can consider the issues and ideas and comments made on them and make recommendations for the development of the draft Area Action Plan.

The next stage of producing the Area Action Plan will be to produce the draft Area Action Plan which will be made available for further public consultation. It will then be formally submitted to the Secretary of State. Once adopted, the Area Action Plan will form part of a portfolio of documents called the Local Development Framework (LDF). The central document in the LDF is the Core Strategy (adopted April 2007) which provides a strategic planning framework for the city, guiding development to 2021 and beyond. The Core Strategy sets out Plymouth’s spatial vision – to turn Plymouth into ‘one of Europe’s finest, most vibrant waterfront cities where an outstanding quality of life is enjoyed by everyone’. Area Action Plans provide more specific detail on development opportunities within key areas of the city. This City Centre Area Action Plan will not repeat the policies contained within the Core Strategy but the two plans should be read together to aid decision-making.

The LDF Core Strategy has been prepared in line with national planning policy and is in general conformity with regional planning guidance (RPG10 and the emerging Regional Spatial Strategy) and the Devon Structure Plan 2001 – 2016. The Core Strategy adopts the overall vision and aims of the City Strategy and of the Corporate Plan, and will support their implementation.
1.2. Aims and objectives
This document uses as its starting point the vision and objectives for the City Centre as set out in the Core Strategy:

To reinforce the City Centre’s role as a vibrant and thriving regional destination, providing high quality shopping, recreation, culture, civic, education and commercial facilities, well connected to surrounding neighbourhoods, as well as being a safe place of quality in which to live.

The following objectives have been set out in the Core Strategy:

1. To diversify the current functions of the City Centre to give it more life outside shopping hours, including intensification of residential, office and cultural uses, including, where appropriate, the introduction of tall buildings.
2. To significantly intensify the central area to include taller buildings at key locations, and offer visitors and residents a 24-hour life.
3. To identify a central office core within the City Centre in conjunction with the redevelopment of Millbay.
4. To provide some quieter areas with enough activity at all times to make it feel safe.
5. To attract specialised shops, pubs, entertainment and culture.
6. To ensure connections with adjacent areas are strong, direct and meaningful.
7. To positively integrate and reinforce the role of the University and the Cultural Quarter as vibrant and strong parts of the City Centre.
8. To create a more urban environment in the University area through developments which give a better sense of enclosure to the streets.
9. To enrich the quality of the environment in the City Centre, so that the public areas are clean, safe, accessible and attractive.
10. To see opportunities to create better pedestrian permeability north-south through the City Centre blocks and ensure that new developments seek to improve the legibility of the City Centre.
11. To consider the heritage value of the City Centre and University areas as part of its regeneration.
12. To selectively introduce traffic back into parts of the City Centre.

2. Data relating to equalities groups
Four different public consultations have been examined to identify the views of the groups subject to this assessment and to consider the likely impacts of this policy document on them:

Issues and Preferred Options Consultation
This consultation ran from November 3rd to December 15th 2008. It was carried out in conformity with the Statement of Community Involvement. It included special initiatives to encourage hard to reach groups to participate in the consultation, including a ‘mind map’ of issues which was displayed in a vacant
shop window in the City Centre and a consultation event at Plymouth Shopmobility to attract older and disabled people. Special workshops were also held with the Disability Action Network and the Youth Parliament. An online bulletin board was offered as an alternative for people who wanted to comment but not to make formal representations. Altogether, 237 formal representations were received and 173 bulletin board comments.

**Issues and options consultation**

Consultation on the Core Strategy Issues and Options document included a consultation with hard to reach groups in addition to the general public consultation. This was carried out in August/September 2005. Presentations and workshops were held for:

- members of Black and ethnic minorities (contacted through FATA HE) – 4 attended
- disabled (contacted through the Guild of Voluntary Services) – 6 attended
- young people (contacted through the Plymouth Youth Parliament) – 4 attended
- elderly (contacted through old people’s organisations) – 9 attended.

Plymouth Pride were contacted but declined the offer of a workshop. They requested copies of the document instead.

The hard to reach consultation for the Issues and Preferred Options was written up as a report.

**Gender Audit**

A Gender Audit of the Local Plan Review was carried out in 2001. The aim was to ‘gender proof’ the plan in order to ensure that all strategies, policies and proposals openly and actively take into account their effects on the respective situations of women and men, and where necessary use specific policies to promote equality. Preparation of the audit involved focus group discussions with women and men and consultations with planning staff. The findings and conclusions of this audit are still relevant to Local Development Framework documents.

**Community Planning Studies**

Community Planning Studies were undertaken in 1998 as part of the Local Plan review consultation programme to inform the development of a new planning strategy and policies. These studies involved holding stalls at fetes and fun days; a schools consultation exercise and community planning workshops. They covered the whole city to include over 6,500 residents. Hard to reach groups were contacted as follows:

- Race – contacted through the annual RESPECT Festival and by letter.
- Travellers – group contacted by letter.
• Faith groups – places of worship informed of events; Muslim and Jewish groups contacted by letter.
• Age – old people through the Senior Citizens Forum (presentation and workshop). Young people (at primary and secondary level) through the schools consultation exercise.
• Disability – workshop together with the Plymouth Guild of Voluntary Service.
• Gender – women’s groups contacted by letter.
• Sexual orientation – groups were contacted by letter.

The data collected from this exercise were written up as 21 Community Planning Studies (published in 2000), one for each ward in the city including Sutton Ward, and one general study covering city-wide issues. The issues raised were used to inform the development of the First Deposit Local Plan (published December 2001), but in some cases are still relevant to Local Development Framework documents.

2.1. Gaps/inadequacies in the data
No special consultation was carried out with faith or sexual orientation groups, and many of the hard to reach workshops were poorly attended, suggesting that consultation is still not fully engaging hard to reach groups.

2.2. Issues raised by the consultations
The following general issues of concern to equalities groups throughout the city have been identified from the ‘hard to reach’ consultation in 2005, the Gender Audit (2001) and the Community Planning Studies (2000). These issues are of relevance to the development of the Local Development Framework:
• Lack of affordable and special needs housing.
• Difficulty in travelling to work and accessing services.
• Too many streets and buildings are inaccessible to mobility-impaired people.
• Need for socially inclusive neighbourhoods with a range of facilities and amenities.
• Safety concerns - fear of crime but also road safety and personal safety.
• Need for a wide range of opportunities to learn and to work.

The Sutton Community Planning Study, which included the City Centre, identified many of these issues as being of particular concern for equalities groups in the City Centre:
• Safety concerns and the need for more police presence
• Safety concerns over pedestrian subways and road barriers
• The need for more housing in the City Centre
• A lack of services to attract families to live in the City Centre
• The problem of too many ‘buy to let’ properties
• The poor quality of children’s play equipment
• The need for more facilities for children of all ages

The City Centre Area Action Plan Issues and Preferred Options consultation of 2008 identified the following issues:

• The City Centre is not accessible enough for disabled and older persons. There need to be better toilet facilities, lifts and better access to shops.
• There is a lack of facilities and amenities for carers with young children. There is a need for a family-friendly café and also a covered children’s play area.
• There need to be better facilities for young people – a skate park or BMX track.
• Proposals to create new ‘shared space’ should not endanger the safety of pedestrians – especially of visually or mobility impaired people and children.
• There is a need to provide local community facilities to serve the local resident population – especially if families are to live in the City Centre.
• There needs to be affordable housing within the residential mix.

The ‘hard to reach’ workshop also identified the need for attractions for families in the City Centre such as a community meeting space where cultural activities can take place.

3. Key findings

The objectives for the City Centre set out in the Core Strategy have been mapped against the issues of most concern to equalities groups, and the results are shown in Table 1. This analysis shows that the objectives do recognise these issues and they will be developed further as the Area Action Plan progresses.

Table 1 – Objectives against equality issues

<table>
<thead>
<tr>
<th>Objective</th>
<th>Housing needs</th>
<th>Travel/access</th>
<th>Accessibility</th>
<th>Inclusivity</th>
<th>Safety</th>
<th>Economy</th>
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3.1. Assessment of impacts by issue

3.1.1 Housing needs

Objective 1 recognises the need to include more residential development in the City Centre. Housing needs are referred to paragraphs 4.10 and 6.1 of the Issues and Preferred Options document. Paragraph 4.10 states that the Area Action Plan needs to increase the amount of housing in the City Centre to assist in creating sustainable City Centre communities. Paragraph 6.1 asks whether the affordable housing requirement should be relaxed for developments in the City Centre. Paragraph 3.29 refers to the need to improve the quality of existing residential areas in the City Centre.

Comment

An increase in housing should have a beneficial impact on equality groups by providing more opportunities to live centrally in sustainable communities. The Area Action Plan should ensure that affordable and lifetime housing requirements are recognised and the need for family housing in the City Centre is considered.

3.1.2 Travel/ access

Objectives 6, 10 and 12 recognise the need to improve connections with adjacent areas, to improve pedestrian access within the City Centre and to selectively introduce traffic back into parts of the City Centre. Paragraph 2.16 of the Issues and Preferred Options document refers to the need for the City Centre to cater to local people’s transport needs as well as to visitors’ needs. Paragraph 3.21 refers to the need to ‘green’ the ring road, while paragraph 3.28 talks about the poor links to neighbouring areas because of the ring road.

Paragraph 3.23 refers to the need to improve pedestrian and cycling provision and public transport, as well as improving the bus station, rail station and the car parks. There is a proposal to move the bus station to a new location. The document also recognises that the current rail station is not accessible to all users and needs to be improved. Paragraph 5.11 mentions the possibility of creating more ‘shared space’ on the City Centre’s streets.
Comment

The Area Action Plan needs to ensure that the transport measures are beneficial for people visiting and living in the City Centre. At the moment the ring road is a barrier to pedestrians and cyclists so the measures put forward to break down this barrier should be beneficial to equality groups.

There are positive opportunities to improve access for non-car users and provide better quality parking for car-users. However, if housing in the City Centre is to be expanded then some residential parking will be needed so the Area Action Plan will need to address this.

Concern has been expressed about the safety of ‘shared streets’ for visually impaired people and children so the Area Action Plan will need to demonstrate the benefits of shared space to both pedestrians and vehicles.

The Area Action Plan needs to ensure that the new bus station is located and designed to improve travel and access opportunities for people who have mobility or visual impairments so that they are not disadvantaged. Finally, it should include a proposal to improve the rail station as this will have a positive effect on all equality groups, especially if it is better connected to the new bus station.

3.1.3 Access for mobility-impaired persons or for people with a disability

Objective 9 refers to making public areas accessible and safe. Improving accessibility is referred to in relation to transport proposals (paragraph 3.23 of the Issues and Preferred Options document). Paragraph 3.25 refers to the poor quality of much of the public realm but does not refer to access for all.

Comment

Accessibility was an issue that was commented on in the recent consultation as a constraint to people with a disability at present. The Area Action Plan should ensure that the need for better access to buildings and public spaces for disabled persons, older persons and carers with young children to make the City Centre an inclusive centre is recognised. It needs to stress that improvements in accessibility will take into account all people’s needs and not just those who are most physically mobile.

3.1.4 Inclusive communities

Objective 5 refers to the need for specialised shops and culture. Paragraph 2.16 of the Issues and Preferred Options document refers to the need to provide facilities for the local community as well as for all of Plymouth’s communities. Paragraph 3.24 refers to the ‘cultural quarter’ linked to the University and College of Art and Design. Paragraph 6.1 also refers to the need to provide community facilities and cultural facilities.

Comment

The Area Action Plan should ensure that these suggestions are included as proposals as they should have a positive effect on all of the equality groups by bringing a variety of cultural activities into the City Centre and a greater variety of
community facilities. Specialist shops could cater to some of the equality groups’ needs that are not currently served. The Area Action Plan needs to recognise the need for better play facilities for children.

3.1.5 Safety

Safety from crime and road safety is referred to in Objectives 4 and 9. Paragraph 3.23 of the Issues and Preferred Options document refers to the need to ensure the safety of pedestrians and cyclists. Paragraph 3.14 recognises that the area feels unsafe after business hours.

Comment

As mentioned in section 3.1.2, the Area Action Plan needs to clearly state the advantages of shared space for all users to allay fears over pedestrian safety. The Area Action Plan also needs to ensure that measures to improve personal safety and to reduce fear of crime such as better natural surveillance, active frontages, etc. are set out.

3.1.6 Economy and jobs

Many of the objectives will help to diversify the economy and create new jobs. Paragraph 3.11 of the Issues and Preferred Options document refers to the West End vision which is for a ‘Covent Garden of the West’. The links with educational institutions (the University and College) will also be strengthened.

Comment

The Area Action Plan should progress these suggestions so that it has a positive effect on education and jobs for equality groups. It is important that a variety of employment opportunities are created.

3.2. Assessment of impacts by equality group

3.2.1 Race

By developing the suggestions set out in this Issues and Preferred Options document the City Centre Area Action Plan should have a positive impact on race groups. It will promote a better quality of life for everyone – including better social inclusion, accessibility, jobs, safety and decent homes. In particular, it should improve the quality and mix of housing, reduce the need to travel by car and improve the range and quality of local and city-wide shops, facilities, services and amenities. It is considered that the Area Action Plan will have no adverse impacts on promoting good race relations or eliminating unlawful discrimination.

3.2.2 Faith and belief

By developing the suggestions set out in this Issues and Preferred Options document the City Centre Area Action Plan should have a positive impact on faith/belief groups. There are opportunities to increase the city’s cultural facilities and range of specialist shops.
3.2.3 Disability

By developing the suggestions set out in this Issues and Preferred Options document the City Centre Area Action Plan should have a positive impact on the quality of life of people with a disability. It will promote better social inclusion, transport, accessibility and decent homes. It will improve the design of streets, buildings and public spaces. New employment opportunities will also be provided. However, the Area Action Plan needs to ensure that proposed improvements to transport, buildings and the public realm will be inclusive in design so that no one is disadvantaged through any mobility or sight impairment. The Area Action Plan will also need to specify a requirement for Lifetime Homes in new residential development.

3.2.4 Gender

By developing the suggestions set out in this Issues and Preferred Options document the City Centre Area Action Plan should have positive impacts on the quality of life of both men and women. In particular, more homes will be provided; access to and through the area will be improved; more jobs will be created and the range of shops and attractions will be increased. However, the Area Action Plan needs to consider the need for affordable housing and the provision of family homes. It will also need to recognise the needs of carers with young children or elderly relatives in terms of access to transport, public realm and buildings.

3.2.5 Sexual orientation

By developing the suggestions set out in this Issues and Preferred Options document the City Centre Area Action Plan should have a positive impact on the sexual orientation groups by increasing the range of specialist shops, entertainment and cultural facilities.

3.2.6 Age

Young people

By developing the suggestions set out in this Issues and Preferred Options document the City Centre Area Action Plan should have a positive impact on young people’s quality of life by increasing the range of housing, education, shops and cultural/entertainment facilities. Better provision for pedestrians and cyclists should also benefit young people. However, the Area Action Plan should recognise the need for provision for housing and services for families living in the City Centre – particularly an improvement in play/recreation facilities for children and teenagers.

Older People

By developing the suggestions set out in this Issues and Preferred Options document the City Centre Area Action Plan should have a positive impact on older people’s quality of life. In particular, travel to and though the area will be improved, public transport will be improved and new community facilities and shops will be provided. However, the Area Action Plan needs to include a
requirement for Lifetime Homes as part of the residential mix and access to public spaces, transport and buildings should take into account the needs of older people who are less mobile or visually impaired.

4. Recommendations

This Equality Impact Assessment has identified that the suggestions set out in this Area Action Plan Issues and Preferred Options document for the City Centre should have positive impacts on the quality of life of race groups, faith groups, people with a disability, men and women, young people and older people and sexual orientation groups as they developed in the draft Area Action Plan. This Equality Impact Assessment has identified some issues where further work could be undertaken to ensure that the draft Area Action Plan will have a positive impact on all of the issues identified as being of concern to equality groups. In particular the Area Action Plan needs to ensure that it addresses the following issues -

- the proposals for transport and public realm improvements need to demonstrate that they will be inclusive and fully accessible to all users.
- The proposals for increasing the amount of shared space need to demonstrate the benefits to all users.
- The proposals for new housing need to consider the need for affordable and Lifetime Homes as well as family housing.
- The proposals for new development need to emphasise the importance of increasing natural surveillance and public safety.
- The provision of new community facilities should be inclusive of all needs.

5. Action Plan

In order to ensure that the points identified above are fully taken into account in the draft City Centre Area Action Plan the following actions are proposed -

1. To include a report to accompany the draft Area Action Plan stating whether the recommendations made in this Equality Impact Assessment have been incorporated.
2. To carry out consultation on more detailed policies or proposals relating to public realm or shared space as required with disabled groups, older people and carers with young children.
3. To report in the consultation summary of the draft City Centre Area Action Plan on the % of respondents by gender, age and ethnicity.
What do you think should happen to the city centre?

Please use this card to add your views and comments.

I think...

Submit your ideas online at www.plymouth.gov.uk/ldf

Write to us or send this card to:
Planning Services
Department of Development
Plymouth City Council
Civic Centre Plymouth PL1 2AA
What is this all about?

The Council is asking you for suggestions to help decide what happens in the City Centre. Please add your ideas to the back of this card.

Equality Monitoring

To help make sure a range of people contribute to the future plans of the City Centre, please answer the following:

What is your age? (please tick)

- Under 18
- 18-29
- 30-49
- 50-64
- 65 or over

What is your gender? (please tick)

- Male
- Female

What is your ethnic origin? ........................................................................................................................................

Are you a person with a disability? (please tick)

- Yes
- No

How would you describe your faith, belief or religion? ....................................................................................................

Please post this to the address overleaf

Do you want to be kept in touch?

Please add your details below and we can keep you up to date on City Centre news.

Name ...........................................................................................................................................................................

Address: ....................................................................................................................................................................

........................................................................................................................................................................ Postcode

............................................................................................................................................................................... Telephone

............................................................................................................................................................................... Email:
Strategic Environmental Assessment/
Sustainability Appraisal Consultation
for City Centre Area Action Plan

Response Form

Your Name: ________________________
Organisation/Company/Individual
represented: (if applicable)
Mr/Mrs/Ms/Miss/Other ________________________

If you are the respondent fill in box A.
If you are an agent put your details in box A and those of your client in box B.

A Your Address

B Client Address if different from A

Post Code: ________________________
Telephone No: ________________________
Fax No: ________________________
E-mail: ________________________

Post Code: ________________________
Telephone No: ________________________
Fax No: ________________________
E-mail: ________________________

Forms with out a name and address will not be treated as valid representations.

Which part of the document do you wish to comment on?

Is you comment in support of or objecting to that part of the document?

Support ☐ Objection ☐

What comment do you wish to make?
Please continue on a separate sheet or overleaf if you require more space.
DATA PROTECTION NOTICE: Information given on this form will be used when addressing representations on the City Centre and University AAP. Please be aware that your representations, including personal details, will be made publicly available, including the council website.

The consultation runs from 3 November – 15 December 2008

Forms must be completed and returned by 15 December at 5pm.

Please return your completed response form to:

Strategy Unit
Planning and Regeneration Service
Plymouth City Council
Civic Centre
Plymouth
Email: ldf@plymouth.gov.uk

Tel 01752 305477
Fax: 01752 304294
Website: www.plymouth.gov.uk/ldf

If you would like this form in any other format telephone 01752 305477