Appendix I
City Centre and University APP Issues and Preferred Options consultation summary document
city centre and university area action plan 2006-2021

Summary report of the issues and preferred options consultation
march 2009
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1 Introduction

1.1 This summary report has been prepared to provide a broad understanding of the responses made during the Issues and Preferred Options consultation undertaken during a six-week period from 3 November to 15 December 2008.

The Vision for the City Centre

The vision

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. (1)

1.2 The consultation was carried out so the public had an opportunity to consider and make comment upon the ideas that the Council put forward as its Issues and Preferred Options for change in the City Centre and University area. The City Centre and University Area Action Plan is the first Area Action Plan to be progressed using the new Local Development Framework Regulations which came into force in June 2008. The regulations have simplified the process of producing a Development Plan Document by removing the requirement for a ‘Preferred Options’ consultation stage. This means that Local Authorities should engage with stakeholders, the public and other organisations as appropriate to the subject matter of the Local Development Framework. This new consultation document refreshes the Issues and Options process by re-capping on some information that has been set out before and finalises

1 From the Core Strategy City Centre area vision number 3.
the list of key issues which the Area Action Plan must address. It also sets a milestone in the process of producing the Area Action Plan by checking with the public and other stakeholders that we have correctly analysed the key issues. It 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.

1.3 The Issues and Preferred Options Report is the second stage of the Area Action Plan formulation and follows the “Issues and Options Report” which was undertaken in 2005. The following flow chart sets out the anticipated full process of the plan and highlights where we are at this point in time.
Creating a Local Development Framework Plan

**Introduction**

- **Inform**
  - Highlight issues
  - Consider opinions
  - Collect evidence
  - Discuss Alternatives
  - Work with groups and organisations

- **Involve**

- **Consult**
  - 6 weeks for anyone to comment on ideas so far and opinions about the direction the plan is taking. Issues and Options stage (undertaken in 2005).

- **Involve**
  - Discussions to develop the plan further and research ideas. For the City Centre and University Area Action Plan an additional Issues and Preferred Options stage has been conducted.

- **Consult**
  - 6 weeks to comment on a draft plan, the sustainability appraisal and evidence base. This is the formal 'pre-submission' stage consultation

- **Inspect**
  - A final plan is submitted to the Secretary of State for examination and an inspectors report is received (or Plymouth City Council for SPDs for adoption).

- **Monitor**
  - The final plan is adopted and then regularly monitored to make sure changes are being delivered.
1.4 The Issues and Options consultation for the City Centre and University Area Action Plan was carried out in March and April 2005 and received 37 comments regarding the document. A document was produced containing these responses which can be found on the Council’s website. These issues were given due consideration in the development of the plan and were either addressed to satisfy the points made or developed further with alternatives and explanations in order that the strategy could be more readily accepted or understood.

1.5 The consultation has been carried out in conformity with the Statement of Community Involvement, the aim being to enable and empower people to take an active part in the Development Plan process. This has been achieved by widely publicising the plan and the opportunity for consultation in the local press, radio and TV, via the Council’s website, at council offices and libraries. The Council also produced leaflets outlining the Area Action Plan which were available at consultation events and various displays throughout the six week consultation period. The leaflets were also distributed to partnering agencies and contained a mind map expressing the most important issues for the City Centre. The unusual mind map format was used in an attempt to attract younger people to comment on the Area Action Plan through a vibrant design. The mind map was also enlarged and put on show in a vacant shop window on the main boulevard of Armada Way. This was designed to be thought provoking and attracted a lot of interest from the general public who saw the display whist walking between shops or through the City Centre.
1.6 The Council set up numerous consultation events around Plymouth during the period with the aim of engaging with the general public to get their input to the City Centre and University Area Action Plan. The consultation events are summarised below:

**Plymouth Train Station**

1.7 Consultation events were held here at peak travel times, early morning and evening, with members of staff raising awareness about the Area Action Plan and encouraging people to comment on the plans.

**Drake Circus Shopping Mall**

1.8 Drake Circus was used for consultation events running from 18 November until 22 November 2008 to help people to comment on the plan. Leaflets were handed out and a stand was displayed on the ground floor of the shopping mall that was staffed by Officers who were able to discuss issues and answers questions.

**Shopmobility**

1.9 A consultation event was held at Shopmobility in Mayflower Street with the aim of ensuring that people with specific access requirements were able to contribute their views.

**Pannier Market**

1.10 Consultations were held in the Pannier Market for people shopping and working in the Independent Quarter. On a separate occasion ‘street entertainers’ performed in the Pannier Market and Independent Quarter. They dressed as a film crew and using the images displayed on the ‘Virgin’ shop windows asked people in and around the Pannier Market their views and opinions on the City Centre.

1.11 Exhibitions and displays also ran throughout the six week consultation period at Central Library, the Civic Centre and Plymouth Guildhall. At these events information was available to take away whilst maps and diagrams were also presented on display boards which remained at the venues throughout the consultation. The
Council also attended meetings with local residents groups, ‘seldom heard’ groups and local stakeholders and businesses. Listed below are some of the meetings attended by the Council with the aim of engaging with communities and businesses:

- Disability Action Network
- English Heritage South West
- Plymouth Chamber of Commerce
- Plymouth Conservative Group
- Plymouth Design Panel
- Plymouth Labour Group
- Prudential Property Investment Managements Ltd
- Public Art Steering Group
- North West Stonehouse Residents Group
- University of Plymouth
- Youth Parliament

### 1.12

A City Centre ‘fly-through’ was prepared by BDP (Urban Designers) as part of their work on the Plymouth City Centre ‘Future Direction: Investment and Development Strategy’. It represented simply one set of ideas of what Plymouth City Centre could be like in twenty years time. It was not in any way a definitive view of what the City Centre will be like in twenty years time but may show some features of what it could look like. The ‘fly-through’ was displayed on the ‘big screen’ in the City Centre at prime time so that the general public could comment on some of the ideas shown.
2 Issues and Preferred Options formal responses

2.1 The table below shows that 237 formal comments were received from consultation at the City Centre and University Issues and Preferred Options stage. Of these 24 percent of the comments were in support of the Area Action Plan and the ideas that it presented. There were conversely 130 formal comments expressing concern with ideas presented in the Area Action Plan. Three or four main themes accounted for a high percentage of these comments and these are discussed later.

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<thead>
<tr>
<th>Number of comments expressing concern</th>
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<th>55%</th>
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<tbody>
<tr>
<td>Number expressing support</td>
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</tr>
<tr>
<td>Number of general comments</td>
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</tr>
<tr>
<td>Number of comments not related to the AAP</td>
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<td>1%</td>
</tr>
<tr>
<td>Total</td>
<td>237</td>
<td>100%</td>
</tr>
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</table>

Summary of formal responses to the City Centre and University Area Action Plan Issues and Preferred Options Consultation

2.2 Below are summaries of some of the comments received, you can read these comments in full and all the comments made on the Council's website.

Comments in support of the proposed ideas

- The development of a flexible strategy that is able to respond effectively to changes within the economic cycle and adapt to community needs showing a strong interface between the public realm and the built environment.

- As identified at the Issues and Options consultation stage there is strong support for the clear vision set out in the Area Action Plan with the identification of the key issues associated with the City Centre directly relating back to the Core Strategy.

- The improvement of the public realm in order to attract people into the City Centre through using a positive strategic approach.

- The identification for the need for a more ‘prestigious’ retailer within the City is supported, as well as support for the retention of individual specialist niche shops.

- Strong support for a night time economy in the City Centre that is non-retail related.

- Government Office for the South West (GOSW) praises the Area Action Plan stating that it is well written and generally clear and concise. The Sustainability Appraisal has been used effectively in the development of the document which
is believed to have been underpinned by a considerable amount of relevant evidence. GOSW are pleased to see that the option generation work has been accompanied by a focus on implementation and delivery with flexibility being built into the plan.

- Hartnell Taylor Cook is in agreement with most of the main plans of the Cushman & Wakefield study including securing new key anchor stores that can influence regional shopping patterns; correct site location of key new anchor stores; and with the view that there is ample room to accommodate further floor space within the City Centre.

- Plymouth & South West Co-operative Society (PSWC) generally supports the vision for the City Centre as set out in the Issues and Preferred Options City Centre and University Area Action Plan. The Area Action Plan recognises that with the Core Strategy (CS) adopted the overall framework for the City Centre has been set and that the Area Action Plan must now deliver the vision set out in the CS. PSWC support the recognition within the Area Action Plan of the need for greater permeability within the City Centre to encourage pedestrian activity which will contribute positively to the overall health and attraction of the City Centre.

- Plymouth Chamber of Commerce & Industry is broadly supportive of the Area Action Plan but is keen to ensure that attention is focused on delivery. They are in strong support of the North Cross office quarter and the proposed redevelopment of the Railway Station.

- Plymouth City Centre Company (CCC) is extremely supportive of the preferred strategy set out in the document to regenerate Plymouth City Centre. CCC agrees that to achieve the overall strategy commercially viable developments are of critical importance and must be brought to fruition in a way that helps deliver the wider vision. CCC endorses the Council’s view that a ‘do nothing’ or even a ‘do little’ approach would leave the City Centre vulnerable to continuous decline. CCC is again in favour of the need for large amounts of residential development to help diversify the City Centre.

- Plymouth University is supportive of the way in which the plan is being developed and the direction of travel it reflects. The University welcomes the formalisation of a strategic development plan that is flexible and which can adapt to changing circumstances. The inclusion of movement, transport and accessibility is supported by the University as they view this as a priority issue that needs to be addressed. The principle of developing a ‘University and Cultural Quarter’ is also welcomed along with the ‘Northern Office Quarter’ although the University realise that the Quarters Map is largely illustrative.
Comments expressing concern with proposed ideas

- Concerns were raised regarding the over emphasis of retail within the Area Action Plan and not enough importance placed on issues such as the historic environment, public realm and movement. Although retail is recognised by many as critical to development within the City Centre the Area Action Plan should not solely depend on this approach.

- Strong concerns have been raised regarding the historic environment. This follows on from concerns raised at the Issues and Options stage where Plymouth was viewed as a good example of architecture and planning and should not be significantly altered. The Area Action Plan is seen not to give enough weight to the historic environment. Concerns relate to the designation of a conservation area, the protection of valuable and listed buildings and the implementation of tall buildings within the City Centre.

- There are concerns raised over the lack of detail throughout the Area Action Plan with no specific reference to development sites and proposals.

- There are concerns with the over emphasis on the need for tall buildings within the City Centre. Buildings which are too tall could potentially create a wrong sense of proportion between the streets and the buildings above causing increased shade and wind funnelling which would be detrimental to the street level environment.

- Plymouth City Centre Company (CCC) expresses reservations over the proposed establishment of ‘Quarters’. CCC recognises the need to create distinct ‘districts’ with their own identities that support a mixed use agenda, however it would wish to avoid any prescription that resulted in a zonal approach that restricted the variety of uses.

- Plymouth & South West Co-operative Society is concerned about the amount of retail development proposed at Derriford and that the timing of this could have a negative effect on the City Centre. The Area Action Plan highlights the two centre bi-polar City as an alternative approach but does not outline the negative impact it could have on the City Centre.

- Linda Gilroy, MP for Plymouth Sutton Harbour, expresses deep concern about the possibility of a relaxation of affordable housing requirements, which she says would cut across the recently completed Housing Strategy. The concern is also raised by Plymouth Labour Group and they object to any reduction in affordable housing contributions and have submitted a 700 signature petition against a possible relaxation.

- Further to concerns raised at the Issues and Options stage of consultation the Environment Agency has expressed concern about increased levels of surface water due to climate change. It advises that a Surface Water Management Plan...
should be undertaken in accordance with recommendations in Planning Policy Statement 25 and the recent Pitt Review.

- English Heritage South West has significant concerns about the Area Action Plan in that it feels it does not take into account the Abercrombie Plan and its contribution to post war planning in England. As the document progresses, it scopes out the options and attempts to provide an insight into what the strategy might look like, but it fails to achieve the aim of placing at its heart the Abercrombie Estate and in doing so English Heritage considers it to demonstrate a lack of consistency and becomes contradictory. English Heritage believes that there appears to be too much weight and direction towards economic needs of retailers to the detriment of the historic environment and the Abercrombie Plan, which could mean that the document would fail the test of soundness in regard to national policy. This theme is also explored by Plymouth Architectural Trust who again promotes the need to conserve Plymouth’s Buildings, suggesting that the Area Action Plan strategy does not go far enough to stress the importance of this.

- Tesco Stores Ltd is concerned with the robustness of the 2006 shopping study conducted by Cushman and Wakefield and therefore the levels of available expenditure forecast.

- Wm Morrison is concerned that the retail expenditure estimates set out in the Area Action Plan do not refer to the convenience capacity estimates highlighted in the Cushman & Wakefield Study. As such the Area Action Plan only provides a partial indication of the need for new retail development in the study area. In Morrison’s view this omission should be rectified. Furthermore they note that the Area Action Plan states that the retail capacity figures have been produced and verified by the Plymouth Shopping Study 2006. However the Shopping Study contains no breakdown of capacity for individual areas of Plymouth City; therefore it should be explained within the text of the Area Action Plan how these figures have derived from those in the Shopping Study 2006.

General comments relating to the Area Action Plan

- AZ Urban Studio believes that a clear framework for incorporation of residential accommodation within the City Centre needs to be established.

- Humane Houdiscombe considers that the Civic Centre should have never been listed. It is a mediocre building of its period, there may be a case for retaining the council chamber wing but the tower does not make a contribution to the City or the community it serves.

- Linda Gilroy, MP for Plymouth Sutton Harbour, suggests that the impact of the University should be considered on its immediate area as well as the wider City. There is no doubt that the University has a nationwide catchment but have the
local areas of Greenbank and North Hill been considered in terms of its negative impact?

- The Council’s parking policy needs to be considered and be supported by cheap, reliable and frequent public transport.

- The public realm should be classed as an over-riding aspiration, but also a key driver for change within the City. Plymouth Tree Partnership considers this to be best achieved by concentrating on landscape design and selecting materials and plants for good presentation and durability.

- Public Art South West believes that public art has the potential to make a positive contribution to the City Centre as well as trying to generate creative approaches to public realm developments.
3 Issues and Preferred Options bulletin board responses

3.1 In addition to the formal consultation responses, Plymouth City Council set up a live bulletin board online in order to encourage people to make informal comments expressing their desires for the future of the City Centre. This was an innovative consultation format and the first time such a process had been used at an Area Action Plan consultation stage. This was also the first time Plymouth City Council used Drake Circus shopping mall as a consultation venue since it opened in October 2006.

3.2 The Council was pleased with the amount of responses from the bulletin board. In total just under 200 comments from the general public were received encompassing a large range of issues within the City Centre. The bulletin board enabled different groups of people to comment with open informal responses rather than making a formal representation; this lead to more opinionated and personal responses from the public rather than organisations and developers stating their thoughts formally on the Area Action Plan.

![Comment Type]

Summary of key themes raised from the City Centre and University Area Action Plan Issues and Preferred Options bulletin board

3.3 Some of the key issues recorded by the bulletin board are shown above. Issues relating to the historic environment were most common along with the building quality and removal of the subway on Royal Parade. Other common themes are also identified. The figure below, is a ‘tag cloud’ of all the issues raised from comments on the bulletin board. The ‘tag cloud’ works in a way where the more comments received on a particular issue the larger and bolder the subject becomes.
Summary of responses made on the City Centre and University Area Action Plan Issues and Preferred Options bulletin board

Comments regarding the historic environment:

- “There are few buildings within the City Centre that I think need saving. A lot of the buildings are of poor quality especially around the Independent Quarter. Royal Parade is possibly the only area in the centre where the buildings are of value.”

- “Get rid of the Civic Centre! We need something that ties together the two parts of town – I can’t believe how much it’s changed recently – we have to keep it going.”
• “We need to celebrate our history and make more of the waterfront. Plymouth was the centre of some amazing historical moments – let’s be proud and tell people about it!”

• “Retain Plymouth’s historic past!”

Comments regarding land outside Drake Circus:

• “The site near Drake Circus should be a green area – not more shops.”

• “The purple hoardings around the undeveloped piece of land by Drake Circus are ugly and spoil the view of the centre. Could the land be used as green space until future development?”

• “The purple hoarding site should be grassed over with benches. At the moment it is an eyesore.”

Comments regarding covered areas:

• “I think the City Centre should have some under cover shopping areas to prevent shoppers suffering from the elements on a daily basis. I am forever being blown away by winds sweeping down Cornwall Street and Armada Way.”

• “A canopy cover over the streets would detract from the feeling of openness and also the views up and down the streets.”

• “Cover the City Centre to make it weather proof.”

• “More covered places in the City Centre – so we can eat those famous pasties without sitting on a wet bench!”

Comments regarding evening use:

• “I believe that the City Centre needs more night time business. Plymouth is the only City I know of that goes completely dead at night.”

• “We need more sophisticated bars and restaurants in the centre to encourage better quality night life for those who don’t want to be clubbing on Union Street.”

• “Rather than seeing the City effectively ‘shutdown’ at night it would be nice to see more going on outside business hours – not just bars and clubs.”

• “I would support additional uses in the City Centre to make it work 24 hours a day. It’s currently dead after 7pm.”

Comments regarding Royal Parade:

• “Bring back the subway on Royal Parade and make the road wider.”
• “Get rid of the bus lane down Royal Parade, it just causes problems.”

• “I have noticed that the shops at the middle/bottom end of Royal Parade are mostly ‘cheap’ and although popular do not lend themselves to promoting anticipation of a pleasurable shopping centre for visitors.”

• “Less traffic lights – they’re causing too much congestion especially on Royal Parade.”
4 Summary of key points made during consultation

4.1 As a result of the consultation a number of key themes have become apparent, these are summarised below:

4.2 Concerns were raised regarding the over emphasis of retail within the Area Action Plan and not enough importance placed on issues such as the historic environment, public realm and movement.

4.3 The identification of Quarters received mixed comments with support for the ‘general zoning’ theme but also strong objections to the idea which was believed to be ‘artificial and prescriptive’ creating ‘unwanted distinct districts’.

4.4 Strong objections to the Area Action Plan regarding the historic environment most notably from English Heritage and the Plymouth Architectural Trust. This relates to the designation of a conservation area, the protection of valuable and listed buildings and the implementation of tall buildings within the City Centre.

4.5 Concerns have been raised over the lack of detail throughout the Area Action Plan with reference to development sites and proposals. More detail is also requested over the relaxation of affordable housing requirements. Plymouth Labour group have submitted a 700 signature petition against the relaxation of affordable housing requirements.

4.6 Generally strong support for the Area Action Plan’s overarching vision and approach to re-development within the City. Government Office for the South West praise the Area Action Plan stating they believe it to be clear, concise, well written and underpinned by a ‘considerable amount of relevant evidence’.

4.7 The need for a 24 hour economy with evening and night time use that is not retail based.

4.8 Issues were raised over the West End and it's incorporation into the Area Action Plan, although there is support for the inclusion of the West End Strategy equally there is opposition to this, notably from developers with interest in developing the West End.

4.9 Strong support for the vacant land outside Drake Circus and the Roland Levinsky building to be used as open green space.
5 Further information

5.1 All of the comments received during the Issues and Preferred Options consultation will be useful to the City Council as it prepares a full draft of the City Centre and University Area Action Plan. All comments will be considered and weighed against the objectives of the Core Strategy and the Area Action Plan.

5.2 The Council has so far only come to some broad conclusions about the strategy for the City Centre which the Area Action Plan will set out. The comments we received will therefore be genuinely useful as we draw up the Area Action Plan.

5.3 The City Centre is changing and evolving all the time. There are some issues which people raised during consultation where changes are already occurring:

- The Council recognises that modern, clean and attractive parking facilities are essential in improving the City Centre’s attractiveness as a shopping destination to serve the south-west region. The Council's Parking Strategy contains the short, medium and longer term objectives that it is working towards to improve car parking facilities and the tariffs to be used. A programme to modernise the City Centre car parks is already underway with the Theatre Royal car park soon to be changed to a Pay-On-Foot car park and Bank Holiday and Sunday charges have recently been brought into line with charges for the rest of the week.

- Plymouth City Centre Company has designed a programme for the big screen in the Piazza intending to show cultural events to the people of Plymouth. Recently live coverage of the Grand National was shown and there are plans to screen The Royal Ballet and The Royal Opera during the summer.

- There were numerous comments relating to the future use of the purple hoardings outside of Drakes Circus. The Council is currently looking at interim options for this site, one of which as suggested by responses, is to use the area as open greenspace.

- Work has recently been started to transform Plymouth’s West End which includes planting more trees, new paving and improvements in street furniture. All this work is just the beginning of improvements for this part of the City Centre as set out in the West End Strategy.

- Plymouth has also been praised by Government for its attempt to tackle the issue of empty shops within the City Centre. The new scheme is designed to ‘dress’ empty shop fronts with art or allow the empty shops to be used by communities as art galleries, cafés or advice centres. In this way it is hoped that Plymouth City Centre can remain a vibrant and interesting place to visit throughout the difficulties of the recession.
6 The next steps

6.1 The next part of the process of developing the plan is for it to proceed to submission stage. The Council is in the process of producing the draft Area Action Plan in light of all the comments received. This will be published for a 6 week consultation period in the summer and will be known as the ‘pre-submission’ document. This document will be available for formal representation. Following this the Area Action Plan will be formally submitted to the government.

6.2 During the production of the draft Area Action Plan the Council will be holding informal consultations with stakeholders, local traders and interested people over proposed sites that may be included in the draft Area Action Plan.

6.3 All representations received will be considered at an Independent Examination to be conducted by a Planning Inspector. This may include a public hearing. He or she will test the ‘soundness’ of the plan. The Inspector’s report will be binding on the Council.

6.4 Timetable of events for the City Centre and University Area Action Plan:

- August 2009 - Draft Area Action Plan discussed at Full Council (the public can attend)
- Summer 2009 - 6 week consultation to comment on the draft plan (pre-submission stage)
- October 2009 - Submission of a finalised draft to the Planning inspector
Appendix 1 Organisations that made formal representations

- AZ Urban Studio
- Bride Hall Developments
- Chesterton
- Dawnan Ltd
- Department of Work and Pensions
- Devon County Council
- English Heritage South West
- Environment Agency
- Government Office for the South West
- Hartnell Taylor Cook
- Humane Houndiscombe
- Plymouth & South West Co-operative Society
- Plymouth Architectural Trust
- Plymouth Chamber of Commerce & Industry
- Plymouth City Centre Company
- Plymouth City Development Company
- Plymouth Civic Society
- Plymouth College of Further Education
- Plymouth Labour Group
- Plymouth Tree Partnership
- Prudential Property Investment Managements Ltd
- Public Art South West
- Public Art Steering Group
- South West Regional Assembly
- South West Water
- Stonehouse Residents Associations
- Sutton Harbour Group
- South West Regional Development Agency
- Tesco Stores Ltd
- The Theatres Trust
- University of Plymouth
- Wm Morrison
Appendix 2 Equality monitoring

Comment card equality monitoring

2.1 The Council received 105 comment cards during the City Centre and University Area Action Plan consultation, of which 52 came back blank. The remaining 53 comment cards are summarised in the table below, please note that this is a summary table and does not show all the options available on the comment card.

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<th>What is your age?</th>
<th>Total</th>
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