This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

English Heritage welcomes the opportunity to comment on this important document. We welcome the redrafting of the pre-submission draft Area Action Plan for the City Centre which has a greater recognition of the historic environment and goes someway to emphasising its importance to Plymouth. As the document acknowledges, the Abercrombie Plan for Plymouth is an important survival of the post-War years, and is unique in Britain. We particularly welcome: Chapter 1 Introduction and Process We welcome the better recognition of the historic environment throughout this section. Chapter 2 Context and History We welcome the better recognition of the historic environment throughout this section. Chapter 5 Place making in the City Centre We welcome this section particularly, Policy/Proposal: CC1 Place making and the historic Environment and we welcome the Policy/Proposal: CC2 the Royal Parade Blocks. Chapter 6 Movement and Accessibility This is a useful section and English Heritage welcomes it.
This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

In conclusion there are a few key themes and are areas that require clarification. Evidence Base There are no links between the proposed demolition of post-war fabric and the evidence base (i.e. The Gould Report, Baxter’s Characterisation study, condition surveys etc). Presentation The document needs to be more visual in order to give life and clarity to the words and to help in bring together the document that is more descriptive and visually engaging. This could incorporate views and topographical analysis that identifies key viewpoints and that help enhance legibility. A visual expression of what an increase in height and mass might mean and what is aimed at will assist in providing clarity. Tall buildings, form and mass Several chapters either talk about office or retail floorspace. As we raised earlier in the document what work has been done on examining the capacity of particular sites to deliver the proposed areas cited in the AAP? Will this necessitate a significant increase in height or bulk to accommodate the floor plates required? What are the impacts upon the historic core? In addition, throughout the document reference is made to new “landmark buildings” with no definition of what this means or what the defining parameters or spatial considerations are. Our comments of December 2008 raised this issue yet do not appear to have been addressed in this draft. At that time we raised concerns as to whether the evidence base has been undertaken to support tall buildings. We are aware that in 2005 a Draft Tall Building Strategy was published for consultation, but that this was not progressed. This would have been useful in defining what a tall building or landmark building is in context of Plymouth City Centre, and importantly would have provided certainty to partners in the appropriateness of tall buildings (if any) in certain areas. We remain disappointed that the City Centre is not provided with conservation area status. Were the City to include it within their plans and aspirations for the centre, it might provide English Heritage with the confidence that the proposals would not unduly undermine such a significant and distinctive asset. We therefore remain unconvinced that the proposals and policies that are proposed will preserve or enhance a defining locally distinctive characteristic of Plymouth. In conclusion we remain to be convinced that the document will give clarity, direction and
confidence to partners in the private and public sectors. Ultimately, should this plan be implemented we remain unsure of what Plymouth City Centre will look like in 10 or 20 years time. I hope you find the above comments useful and should you require clarification please contact me.

This plan is looking up to 20 years ahead. Keeping this in mind...

Please make detailed comments about the plan here:


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We understand that the Tall Buildings study has not been completed. It is unclear how the tall building zone boundaries have been derived and from what evidence?

This plan is looking up to 20 years ahead. Keeping this in mind...
This plan is looking up to 20 years ahead. Keeping this in mind...

Please make detailed comments about the plan here:

Chapter 13 Community Benefits Monitoring We welcome a number of the specific intended actions of the monitoring process; particularly that of the quality of new developments and the ongoing assessment of whether a sustainable community is being created in the City Centre. Fundamental to the creation of a locally distinctive place is proper monitoring of the historic environment, whether designated or not. In order to be able to develop an effective strategy for the management of the historic environment it is essential that the issues facing it are properly understood. Therefore in order to properly assess the AAPs performance and effects there needs to be thought given to receptors and indicators that relate to the historic environment when set against the Vision, targets and Objectives of the AAP. From monitoring and indicators it should be possible to demonstrate what impact the policies and proposals of the Local Development Framework are having upon the historic environment. It should also be possible to show how effective the strategy has been at delivering the plans objectives for the historic environment. Possible examples might include:

- Number and percentage of historic assets at risk.
- The extent of the areas, in this case adjacent, with up-to-date Conservation Area appraisals and management plans;
- The adoption of a historic environment SPD/framework;
- It is essential that as part of the delivery plan a series of indicators related to the strategy for the historic environment are constructed to allow monitoring of its effectiveness.

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We welcome the City’s intention to prepare a framework for the historic environment. What form will it take, when is it proposed to be carried out and how will it influence this document? If it is not in time to feed into this document, what is its purpose? Likewise, the Design SPD - Tall Buildings and general guidance (which we understand has not been completed) how will this feed into a complete AAP; and what is its purpose if the strategic decisions as to where the locations of tall buildings have already set out in the AAP? In the context of this chapter we understand the need to provide a degree of flexibility, particularly bearing in mind the current economic conditions and the likelihood that some sites will take some time to come to fruition. However, 12.6 and again at 12.7 present a tone that is somewhat laissez faire in its approach to the design of retail and investor schemes. New designs should have proper regard for the historic environment, which should inform the design of new buildings and public realm. It would appear contradictory to Chapter 5 and on first reading any developer would not be provided with certainty as to the importance of having proper regard to those assets. The Gould study usefully outlines which buildings are of quality and those that are not; it brings out the unique nature of the 1940s and 50s architecture; it also looks at the importance of the building lines, even amongst buildings of lesser importance, in maintaining the Plymouth Plan form and its wide avenues. As the document states in Para2.2, Abercrombie’s plan only partially achieved the boulevards and impressive architecture. There may, therefore, be an opportunity to increase the height and massing of some of the buildings in order to enhance the weaker aspects of the Abercrombie Plan as it was realised. That enhancement however needs to be much more clearly expressed and articulated than at present, and should be clearly grounded in the overarching design rationale of the existing built form of the City, which might be expressed in the form of design codes.

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Please add any further comments here:

Policy Proposal CC19 We support this policy/proposal.

Comment by Mr Ross Simmonds
Comment ID CCPS99
Response Date 30/09/09 09:46
Consultation Point Policy/Proposal: CC 19 South of Royal Parade, East of Armada Way (View)
Status Processed
Submission Type Email
Version 0.2

Policy Proposal CC18 We support this policy/proposal.

Comment by Mr Ross Simmonds
Comment ID CCPS98
Response Date 30/09/09 09:46
Consultation Point Policy/Proposal: CC 18 South of Derry's Cross and Royal Parade (West) (View)
Status Processed
This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

Policy Proposal CC18 There are a lot of high quality buildings in this District and reincorporating or reknitting them into the fabric of the urban form is left too open to interpretation and does not provide clarity or certainty.

Mr Ross Simmonds
Comment by CCPS97
Comment ID 30/09/09 09:45
Response Date 30/09/09 09:45
Consultation Point Chapter 11: The Leisure and Civic District (View)
Status Processed
Submission Type Email
Version 0.2

This plan is looking up to 20 years ahead. Keeping this in mind...

Please make detailed comments about the plan here:

Strategic Objective 6 On the whole we support the objectives. Though again these and the detailed Policy Proposals would be helped by visual depiction that is based on the evidence. Paragraph 11.4 We welcome the recognition of the Civic Centre as a key landmark from Armada Way. Should the City decide to vacate the Centre that the proposals to seek an adaptive re-use are welcomed. English Heritage maintains that the Civic Centre is one of the city’s key historic buildings, and as such needs to be treated sensitively.

Mr Ross Simmonds
Comment by CCPS96
Comment ID 30/09/09 09:44
Response Date 30/09/09 09:44
Consultation Point Policy/Proposal: CC 14 North Cross and the Railway Station (View)
Status Processed
Submission Type Email
This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

Policy/Proposal CC14 Can the northern part of the Abercrombie plan identified as the office quarter accommodate 100,000 Sq m of office floorspace without detrimentally affecting the character of the original plan? What work has been done on capacity? Will this necessitate a significant increase in height or bulk to accommodate the floor plates desired? An extension to the north linking up to a new train station is certainly to be encouraged as is the continuation of Armada Way. Visualisations, expressing the words in this policy would be useful. They would assist in understanding if the proposals are intended to be an extension to the Abercrombie Plan or something very different. We remain to be convinced that the proposals give clarity, direction and confidence to partners both in the private and public sectors. Paragraph 9.10 The reference to finding a definitive solution to Caprera Terrace by either integrating or removal is not helpful. The AAP should provide guidance and in this instance integration is preferable.

Comment by: Mr Ross Simmonds
Comment ID: CCPS95
Response Date: 30/09/09 09:34
Consultation Point: Policy/Proposal: CC 13 Land outside Drakes Circus
Status: Processed
Submission Type: Email
Version: 0.4

This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

Policy Proposal CC13 What height or bulk of building constitutes a landmark building near Drakes Circus? As mentioned in the elsewhere in this letter we have raised concerns as to what work has been undertaken to support landmark and/or tall buildings. How have English Heritage’s and CABEs guidance on tall buildings, as well as Plymoughs own work, informed the appropriateness of the location? Has there been any 3D modelling of a tall building in this location?

Comment by: Mr Ross Simmonds
Comment ID: CCPS94
Response Date: 30/09/09 09:32
This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

Policy/Proposal CC12 Drakes Circus and New George Street along with Paragraph 8.12 - We are unsure what the further expansion of Drakes Circus means for the existing environment? We’re it to be the privatisation of public realm that involved the covering over of the Abercrombie Plan area then that would raise concerns. Furthermore, what of the “improvement of units and shopfronts along New George Street and Armada way”? The Gould Study indicates that buildings along this street are of the good quality and that in addition there is a building line which would be best served by being kept. The AAP needs to be more explicit and clear about what is proposed.

Comment by Mr Ross Simmonds

Comment ID CCPS93

Response Date 30/09/09 09:34

This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

Chapter 8 the Core Retail District Policy Proposal CC11 English Heritage has a general concern that this section appears to forget the document’s previous expression with regards to the historic environment. The historic environment should play a greater role when outlining what form development is appropriate in the creation of place. For example the opening paragraph of CC11 and 8.9 appears to propose a laissez faire approach to design and contradict Chapter 5. This provides no certainty or guidance to developers as to what is appropriate. The second sentence of CC11 should be clear that the final scheme needs to respond to the historic environment, in this case those specific buildings of historic merit of national or local importance (whether formally designated or not) with regard to the Abercrombie Plan. The creation of a large floor plate structure on the corner of Armada Quay and Cornwall Street will need to be carefully considered in this context.; as will the creation of large car parks. The policy proposes the demolition of a number of buildings in order provide a landmark building
and floor space requirements for retail schemes. Whilst the density or heights of Cornwall Street may be low the consequences of such retail requirements and the aspiration for a landmark building are not fully considered. Such conclusions for demolition need to be born out of the evidence in the “Gould study” (Plymouth Planned, The Architecture of the Plan for Plymouth 1943-62, Jeremy Gould) and this appears to be lacking. Likewise how will the one of the new car parks service the new anchor store via Mayflower Street and what are the impacts? In general, we would question the rationale for the location of landmark (and/or tall) buildings, as the AAP does not appear to be based on an integrated consideration of accepted urban design/master-planning approaches with a retail/commercial/residential floorspace evidence base. Paragraph 8.7, Bullet point 4 refers to two-level shopping street with high level links. What is the desirability or justification for this and its impact upon townscape? Such devises are often unsuccessful in an external environment and are potentially at odds with the more formal, traditional urban form of the Plan.

Comment by Mr Ross Simmonds
Comment ID CCPS92
Response Date 30/09/09 09:34
Consultation Point Policy/Proposal: CC 10 The Heart of the Market and Independent District (View)
Status Processed
Submission Type Email
Version 0.2

This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

Policy Proposal CC10 We welcome the intention to refurbish the important high quality building of the City Market. English Heritage can understand the aspiration to provide an outdoor public route to the east side of the Market; but would question the desire to remove shop units to other sides, as these form part of the special interest of the building. Again a better graphic depiction would enable a better understanding of the proposals and may provide a degree of certainty to stakeholders. Paragraph 7.18 and 7.19 are unclear as to whether demolition is proposed for at least part of the New George Street block. English Heritage are of the view that the proposed arcades that would break through the blocks and link up New George Street and Cornwall Street are understandable in terms of permeability and would provide a useful public benefit. But would need to be sensitively carried out and retain the building line.

Comment by Mr Ross Simmonds
Comment ID CCPS91
Response Date 30/09/09 09:32
Consultation Point Policy/Proposal: CC 8 Colin Campbell Court (View)
Status Processed
Submission Type Email
This plan is looking up to 20 years ahead. Keeping this in mind...

Please make detailed comments about the plan here:

Chapter 7: The West End – The Market and Independent District Policy Proposal: CC8 Colin Campbell Court
We broadly welcome the proposals. However, their articulation would be assisted by visualisations and graphics to express what is meant. The Gould study outlines the quality of assets and key frontages. These issues and the conclusions would usefully inform any graphics that sought to provide clarity about what was proposed.

Comment by Mr Ross Simmonds
Comment ID CCPS90
Response Date 30/09/09 09:30
Consultation Point Chapter 6: Movement and Accessibility. (View)
Status Processed
Submission Type Email
Version 0.2

This plan is looking up to 20 years ahead. Keeping this in mind...

Please make detailed comments about the plan here:

Chapter 6: Movement and Accessibility
We particularly support paragraph 6.9 and the supporting text. We would welcome the cross-referencing to the Department of Transport's Manual for Streets and English Heritage's Streets for All documents. These would assist you in the arriving at high quality solutions when dealing with the relationship of the strategic road network and pedestrians, along with the removal of street clutter and the creation of a legible city strategy. This would be particularly useful in the context of Policy/Proposals CC7.

Comment by Mr Ross Simmonds
Comment ID CCPS89
Response Date 30/09/09 09:29
Consultation Point Chapter 5: Place making in the City Centre (View)
Status Processed
Submission Type Email
This plan is looking up to 20 years ahead. Keeping this in mind...

Please make detailed comments about the plan here:

Chapter 5 Place making in the City Centre On the whole we welcome Policy/Proposal CC3 City Centre Public Realm, although there are a few areas of concern. Criterion 10 particularly needs to be carefully considered and articulated in order that it does not undermine the character of the Abercrombie Plan. As mentioned earlier, awnings over individual shop fronts or colonnades would be welcomed; however the concept of covering over the street space entirely in such a way as Cabot Circus in Bristol would be counter to the character of Plymouth. A recent example of a more considered approach that responds to its specific surrounding context would be Princeshay in Exeter. CC5 Enabling Low Carbon Development. The AAP should also seek to address the reuse of existing and historic buildings and the opportunities to enhance their energy efficiency. These buildings are not necessarily inefficient in their use of energy, and in many cases are capable of being upgraded to an appropriate standard.

Comment by Mr Ross Simmonds
Comment ID CCPS88
Response Date 30/09/09 09:27
Consultation Point Chapter 3: The Vision for the City Centre. (View)
Status Processed
Submission Type Email
Version 0.2

This plan is looking up to 20 years ahead. Keeping this in mind...

Please make detailed comments about the plan here:

Chapter 3 The Vision for the City Centre Paragraph 3.4 We welcome the assessment of how other Cities have integrated new development into the historic core. We would hope that the response will be unique in responding to the locally distinctive qualities and character of Plymouth and in this regard not be a repetition of those cities interpretation to their circumstances. We broadly welcome Strategic Objective 2: Placemaking. However in order to achieve place making that is truly locally distinctive to Plymouth new developments should respond positively to the existing historic character of the area. The wording should be consistent with Policy/Proposal: CC1 Place Making and the Historic Environment. Strategic Objectives 4 to 8 (The Districts) We note the change in name of quarters to districts. In the December 08 consultation we questioned the approach that each quarter should be “recognisably different to the other “quarters”, in terms of their built form. Whilst we are concerned that this has the potential to undermine the uniform nature of the beaux arts plan, and its built form, and not provide for a truly mixed use regeneration of the city centre, we are not averse to the idea of quarter or district approach. This is dependent upon the document providing certainty that the unified whole of the city centre will not be lost. It is possible that the current doubt may be due to the way it is expressed in the
submission document, however, whilst recognising the desire for a more progressive, mixed-use approach, the broad spatial approach of the original plan is in danger of being lost though the imposition of “recognisably different quarters”. It is not clear how the District approach is intended to be implemented, this could lead to a failure in providing a sustainable mixed use area and instead create zones of use. Milestones 2006 – 2021 Whilst we can see that the delivery of some of the AAPs objectives will be measured using simple quantitative methods, how will objectives such as high quality placemaking measures be assessed? Building for Life? etc

Comment by Mr Ross Simmonds
Comment ID CCPS87
Response Date 30/09/09 09:20
Consultation Point Chapter 2: Context and History (View)
Status Processed
Submission Type Email
Version 0.3

This plan is looking up to 20 years ahead. Keeping this in mind...

Please make detailed comments about the plan here:

There are, however, some points in the AAP that require clarification and that would ensure the soundness of the plan. Specific comment on the Pre-submission draft: Chapter 2 Context and History Para 2.20 Bullet point 3 The uniform nature and “straightness” of the street plan is in many ways a defining character of Plymouth Abercrombie plan. We are concerned that City’s perspective is that these features lead to a “monotony” of townscape and that this underlies a real failure to understand the character of the Abercrombie plan. By way of example, a Georgian Terrace or townscape are broadly regular and uniform in both detail and plan form and yet could not be described as monotonous. To use this phrase implies a basic lack of understanding of the character and importance of the Abercrombie plan form and of the buildings within it. Bullet point 6 English Heritage is unsure what is proposed to address protection from the weather? Will the AAP seek to outline this in some detail or are we left to wait for a development proposal to arrive at its own solution? In our view, well-designed awnings over individual shop-fronts or colonnades would be welcomed (and could provide individuality within the overall uniform character of the streets), however, the concept of covering over the street space could undermine the character and would be contentious.

Comment by Mr Fergus Pate
Comment ID CCPS85
Response Date 29/09/09 17:31
Consultation Point City Centre and University Area Action Plan - Pre Submission (View)
Status Processed
Submission Type Email
Version 0.2
This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

Thank you for consulting the South West of England Regional Development Agency (South West RDA). The Agency welcomes the progressing of Plymouth's City Centre and University Area Action Plan (AAP). The AAP will be critical in ensuring delivery of the Regional Economic Strategy, the Devon Employment Space Strategy and a step-change for Plymouth in moving towards achieving its full economic potential. The Way Ahead (the region’s response to the Sustainable Communities Plan) recognises Plymouth as a nationally important but underperforming centre of economic activity. It points to the need for urban renaissance of the city centre and waterfront. The City Centre and University AAP will play a fundamental role in helping to deliver sustainable local, sub-regional and regional growth. The Agency has considered the draft AAP in terms of its ability to deliver the Regional Economic Strategy (RES) and the Delivery Framework and Spatial Annex thereto. Overview Developing upon Plymouth’s Mackay Vision, the Local Development Framework Core Strategy, and the Plymouth Local Economic Strategy, all of which envisage population growth to a level in excess of 300,000 and 42,000 new jobs by 2026, the Pre Submission Area Action Plan clearly articulates step-change aspirations for wide ranging redevelopment of the city centre. In doing so, it highlights the individual roles of city centre districts in eliciting wider and sustainable economic growth. The South West RDA welcomes this comprehensive yet flexible approach. The Agency also supports a commitment to improving Plymouth city centre’s provision for learning and culture uses, and developing a new office quarter at North Cross. ‘Spatial Implications – Place Matters’ (2006), the RES spatial annex, emphasises the importance of university and education infrastructure growth in Plymouth and supports the delivery of high quality city centre employment sites where they are based on a clear understanding of demand and business’ needs. The RES cites Plymouth as holding the potential to play a far more significant role in the region, as an economic engine for the far south west. Its spatial annex recognises Plymouth city centre’s capacity to spearhead growth of the city as a regional and sub-regional economic driver. The South West RDA is also conscious of wider thematic and spatial considerations. For instance, prospects for pedestrian and cycle links between Millbay and the city centre, and for the strategically integrated redevelopment of Bretonside Bus Station (proposals for which are included in the Sutton Harbour AAP) imply significant opportunities. The broader influences of growth in competing centres and economies too, are notable. The Agency therefore welcomes a commitment to review and, where appropriate, refresh the evidence base and policies of the City Centre and University Area Action Plan. More specific comments relating to individual aspects of the AAP are set out below. Employment and Office Uses ‘Additional Employment Floorspace and Land Figures’, the update to DTZ’s (2007) ‘Demand and Supply of Employment Land’, suggests a need for 153ha of employment land within the Plymouth Travel to Work Area (TTWA) during the period to 2026. This includes 231,000 sq m of office floorspace. Mindful of ambitions for office space at other locations across the city, the South West RDA broadly supports the targets, expressed within the AAP, for provision of around 100,000 sq m of office space in the period to 2021. It will, however, be important that new office developments within the AAP area are phased to complement the delivery of employment space programmes at other city locations including Millbay, Derriford and Langage. Whilst it supports the prospect of significant employment growth, DTZ's study does recognise that Plymouth has had a traditionally weak office market. King Sturge's 2009 'Plymouth Office Market Report' highlights a current market reluctance to commence development on a speculative basis. In view of this, it is important that prospective office allocations and developments are viable and deliverable. With regard to the above premises, we support the AAP’s proposals for a Northern Office District and the contribution to the diverse economic redevelopment of Plymouth city centre that this implies. The RES Delivery Framework highlights the importance of investment in infrastructural improvements to unlock the economic growth potential of Plymouth. The agency understands that the success of the Northern Office proposals will depend on highway reconfiguration, rationalised car parking provision and enhancements to the railway station as a gateway to the city centre. The Key Development Outputs table contained on page 17 of the draft AAP is welcomed. Its second row, on employment, may contain a typographical error; it seems to refer to floorspace (sq m) rather than jobs. The aforementioned DTZ study found that employment growth in Plymouth city centre is unlikely to be confined to business, and other B-uses. Around 27ha will be required across Plymouth’s TTWA for non-B class employment generating land uses. It would be
useful if the AAP also contained a breakdown, split by land use, of the number of jobs that will be created in the city centre, including retail, education, health, leisure and cultural facilities. Retail On the basis of Plymouth’s growth assumptions, ‘Investment, Intervention and Interrelationships in the South Central Zone’ (2007) produced by EKOS Consulting for the South West RDA recognises a need within Plymouth to create employment opportunities in both high value added sectors and other sectors including retail. In fulfilling this need, we understand the critical role that an enhanced high value retail offer should play in improving the attractiveness of the city centre and, therefore, directly and indirectly securing a successful future for Plymouth. The AAP should enable the type of retail and related development that will attract high-spending shoppers and visitors. Plymouth has a well-defined retail catchment area and should completely dominate it. This is a fundamental principle that should be more clearly articulated within the key tasks set out in paragraph 2.21 of the AAP. The Agency supports the proposals, set out in the AAP, to consolidate Plymouth’s existing retail core. The South West RDA notes the conclusions of the Plymouth Shopping Study (2006) and its recognition that new developments at locations including Drakes Circus and Princesshay, Exeter are likely to result in short to medium term implications for the vibrancy and enhancement of Plymouth’s wider city centre retail offer. At the same time, we understand the post-2020 proposal to expand the city’s retail floor space through a retail-led mixed use scheme at Cornwall Street. Whilst we support ambitions to redevelop Cornwall Street, it will be important that this occurs on the basis of strong physical links to Plymouth’s existing retail core. In the meantime, long term aims should not unnecessarily hamper the advancement of otherwise feasible mixed-use redevelopment projects elsewhere, including at the West End. Renewable Energy The RES Delivery Framework promotes the delivery of sustainable energy supplies across the region. The Regional Renewable Energy Strategy for the South West supports collective action in aggregating the demand of several users to facilitate energy solutions including Combined Heat and Power (CHP) and associated district heating. The South West RDA therefore welcomes a comprehensive and ambitious approach to meeting the energy and heating needs of Plymouth city centre as advocated within our response at the preferred options stage. We recognise the significant undertaking that installing the infrastructure that will be necessary to deliver CHP across the city centre represents. The Agency notes the content and conclusions of the Plymouth City Centre and Derriford Sustainable Energy Study (2009). The implications of different CHP solutions for the city centre in terms of footprint, fuel supply, capital expenditure and lead times are clear; as are Net Present Value projections. In the first instance, we support the installation of a Gas fuelled CHP solution where it will reduce the carbon emissions attributable to the city’s energy and heat use. However, we understand the advancement of technologies associated with renewable and more environmentally and economically sustainable CHP solutions. Whilst these may imply a considerably greater land take than Gas engines, they may help to more fully address environmental challenges and to facilitate the provision of genuinely mixed use development features, including affordable housing. For the purposes of reducing carbon emissions and promoting renewable energy generation, it will be important that provision, including land provision, is made for city centre electricity consumption, and the proposed district heating network, to efficiently draw from more sustainable supplies. It will also be important that city centre heat and energy needs are considered against the wider context of Plymouth’s energy and waste strategies and South Devon Energy from Waste (EfW) development proposals. Prospects for links and synergies therein should be comprehensively explored. The Learning and Culture District and Land outside Drakes Circus ‘Spatial Implications – Place Matters’ supports the continued development of Plymouth’s university and the city’s education infrastructure. The South West RDA therefore welcomes the proposed redevelopment of the college of art, mixed use learning facility-led redevelopment development of North Hill, and more fluid spatial relationships between the two. The RES Delivery Framework underlines the role of public realm and design in presenting and delivering the range of facilities and services that is available within city centres. The Agency recognises the nodal significance of the land between Drakes Circus, the Money Centre, the Roland Levinsky Building and North Hill. We will be likely to support proposals to develop this land where their uses and design will be effective in better linking the Learning and Culture District with Plymouth’s retail core. Colin Campbell Court The South West RDA welcomes a flexible approach to the redevelopment of Colin Campbell Court and the recognition of this as a priority site. We also support the promotion of firm functional links between Colin Campbell Court and Millbay, the City Market and the wider West End. Movement and Accessibility The South West RDA understands the AAP’s recognition of a growing air quality problem in the city centre and the need for efficient movement by all transport modes. It will be important that significant commitment and resources are applied to ensure that all of the related measures identified in the Plan are delivered and will be vital to maximise the efficiency and sustainability of strategic and local movement associated with Plymouth city centre as the city grows. Through the RES Delivery Framework, the Agency supports
sustainable mobility. We welcome proposals to align car park locations with strategic road network flows, and to increase the pedestrian and cyclist permeability and accessibility of the city centre – especially where the strategic road network forms a structural barrier. The agency supports proposals to significantly enhance bus facilities and deliver a High Quality Public Transport interchange at Royal Parade. The RES recognises the significance of Plymouth’s railway station and its connectivity to important markets. As an important gateway to the city centre, the Agency supports the provision of a new station to complement a new office district at North Cross and to create more legible links with other city centre quarters. The pace of this development however, will also need to match the demand for accommodation from prospective business occupiers. Conclusion The South West RDA welcomes the advancement of the Plymouth City Centre and University Area Action Plan and its whole-economy ambitions for growth. The Agency supports the idea that the city centre should be “chameleon” in character; during the daytime led by retailing and business uses with a café-culture feel, and during the evening focussing on food and drink, events and entertainment. However, the 24 hour city centre must not impinge on the amenities and quality of life of the increased residential population. Throughout its implementation, it will be important that the Plan continues to strike a balance between offering a sound framework for development and reserving the opportunity to exercise flexibility where it is required to help ensure the delivery of transcendent objectives for sustainable growth. Should you wish to discuss this matter further, please do not hesitate to contact me or Jessica Potter, (interim) Planning Manager.

Comment by Mr David Parlby

This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

I write on behalf of the membership of the Plymouth Chamber of Commerce and Industry in respect of the City Centre and University Area Action Plan – Pre Submission (CCUAAP) which was issued by the City Council for public consultation on 18 August 2009. As you are aware we wrote in overall support of the CCUAAP in response to the Issues and Preferred Options Consultation Document released by the City Council in November 2008. I will not repeat our credentials for making representations on behalf of our many member employers and employees who use the City Centre but instead refer you to our letter of 15 December 2008. We consider that the CCUAAP represents a critical step in achieving the City's objectives of creating a net 42,500 jobs and increasing GVA from 90% to 120% of the UK average by 2026. We regard the North Cross redevelopment and the creation of a genuine office quarter as being the cornerstone of the CCUAAP. Plymouth is rare, if not unique, amongst major UK cities in not having a recognisable office quarter. Its development, allied to the proximity to the railway station and the university, will create the lodestone which will draw in businesses operating in the priority sectors that Local Economic Strategy seeks to attract. We consider that the plans enshrined within the CCUAAP will help further improve the retail offer of the city, through the realisation of a major anchor store in Cornwall Street, an enhanced environment for independent
retailers and improved volumes and quality of car parking. We believe that the approach to the historic environment set out in the CCUAAP is practical, taking account of the commercial realities of modern life while being sensitive to the need to protect genuine heritage. Overall we believe the plan helps meet the needs of Plymouth in realising its ambition to take it its rightful place as the major regional economic hub in the South West peninsula and we have no hesitation in commending it.

Councillor Nicky Wildy

**Comment by**

**Comment ID**

CCPS83

**Response Date**

29/09/09 17:20

**Consultation Point**

City Centre and University Area Action Plan - Pre Submission (View)

**Status**

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**Submission Type**

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This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

Labour Group Response to pre submission consultation. The Labour Group is pleased to note that some suggestions made at Preferred Options consultation stage have been incorporated into the AAP. We do have specific concerns in the area of affordable housing as this requirement has been dropped from this plan in terms of new and strategic sites. Development of Colin Campbell Court – we note this is a strategic site and that there is no plan for affordable housing on the major strategic sites. Does this mean that existing residents will be ‘decanted’ out of the City Centre? Does this further mean that the City Centre will not be an area for families to live and work in? How may this impinge on the development of the West End and the creation of SME and micro businesses? In what way would this negate some of the aspirations for creative and cultural industries? Policy CC4. Similarly, there is no specific reference to affordable family accommodation in other sections save a reference to gradual development. This is at odds with the Core Strategy. Has sufficient attention been given to the infrastructure needed to sustain the retail development envisaged? Has sufficient attention been given to the ‘gateways’ to the City and the linkages within the City Centre? What about pedestrian movement around the City? There is a real emphasis on Car parking and the number of spaces to be delivered and yet there is an aspiration for a low carbon footprint. It is good to see that the Historic Environment has been identified and protected. Place making and Heritage has been enhanced from previous versions. What protection will be afforded to ensure high quality cultural provision runs throughout the City with definite linkages between the City Centre, West End and University and North Hill Area? How do the different ‘districts’ link to each other. It is not immediately clear from the document, in particular the ‘office’ district and the Univeristy district. Overall the Labour Group would expect S.106 community benefits to be secured to ensure that the University and City Centre has a range of housing and live/work options for a diverse community and that families are encouraged to live and work in this part of Plymouth.

Mr Martyn Dunn

**Comment by**

**Comment ID**

CCPS82
This plan is looking up to 20 years ahead. Keeping this in mind...

Please make detailed comments about the plan here:

I write on behalf of the owners of the Drake Circus roundabout site in respect of Policy CC13 of the Plymouth City Centre and University AAP. On the whole we welcome the wording of Policy CC13, which protects the owner’s rights to develop this site for a variety of commercial uses and in particular encourages the development of a ‘landmark’ building that respects the prominence of the location. Our concern however, is over the ambiguity of certain aspects of the policy wording and in particular the following: ‘The footprint of the development should safeguard the potential of the development to enhance the capacity of Drake Circus Traffic Junction.’ & ‘8.16 Development will need to safeguard the site’s potential to play a role in maintaining the capacity of the Strategic Road Network. In particular it will be necessary to look at whether any part of the site needs to be used to enhance the capacity of the traffic junction, which is currently constrained’ The suggestion that part of the site may be required to be adopted as public highway is clearly of concern to us, given that the footplate of the site as a whole is constrained. In the light of this, we would like to seek clarification of what exactly is envisaged on the basis of the ‘constraints’ perceived to affect the junction at the present time. Clearly, if anything...
more that a nominal area was diverted to highway use, it could potentially make the development of this site for a commercial use, within a ‘landmark’ building, unviable. We feel therefore that this aspect of the policy requires clarification in order that it does not conflict with the basic policy presumption in favour of a commercial development. 8.19 During the consultation on the City Centre Issues and Preferred Options document in November 2008, a number of comments were received expressing the view that the area should be used as a public open space. Any development proposals should therefore look at how elements of public open space could be incorporated into the final scheme. In the short term the Council will look to bring the site into use as a public open space until firm development proposals come forward. We have an obligation as owners of the site to landscape the site as soon as reasonably practicable after December 2009 if not developed. We are in consultation with the Council via the Plymouth City Centre Partnership at the present time, with a view to progressing this. We are fully supportive, therefore, of the principal of this site being used as public open space until a firm development proposal comes forward. However, as explained above, the site has a restricted footplate and we do not believe it is realistic to expect any commercially viable development to incorporate elements of public open space. Once again therefore we believe that this objective is at odds with the more fundamental principal that this site should be developed to accommodate a commercial ‘landmark’ building. We would therefore like to see an unambiguous assurance within the policy that any open space provided at the site it would solely be on a temporary basis pending redevelopment of the site (in line with the AAP redevelopment objectives for the site) and consequently that a) it would not hold up development of the site, and; b) development of the site would not be judged against the loss of open space. Furthermore, we would like to see the removal of the requirement that ‘any development proposals should look at how elements of public open space could be incorporated into the final scheme’. I would welcome the opportunity to discuss these representations with you directly although trust that this email will suffice as public record of our concerns.

This plan is looking up to 20 years ahead. Keeping this in mind...

Please make detailed comments about the plan here:

[As a general comment there is very little in these chapters which describes how the cultural infrastructure will be supported, how delivery mechanisms will work or who the wider stakeholders in the implementation of the AAP are. Community benefit cannot be measured in commercial, economic or housing quality terms alone. The measure of the vibrancy of a city and the social impact of a strong cultural identity, whilst difficult to measure, are vital to a successful and sustainable community.] We hope the PCB response to the draft of the City Centre and University AAP is of use and relevance to you - and we look forward to a continuing conversation. Please feel free to consult us further on any matter you feel appropriate.

Comment by Mr Adrian Vinken

Comment ID CCPS136
Response Date 20/10/09 16:59
Consultation Point Chapter 12: Delivery (View)
Status Processed
Submission Type Email
Version 0.2
This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

Policy/Proposal: CC 18 South of Derry’s Cross and Royal Parade (West) The area is characterised by a mix of uses with an emphasis on culture, leisure and entertainment. Future developments in this area should strengthen this character, and could include culture/leisure uses, hotels, bars and restaurants and residential. Developments should ensure that: 1. Sites are planned comprehensively and in an integrated way, so that a distinctive City Centre district is created with a mix of uses, activities, positive urban streets and public spaces. 2. The area creates a positive gateway to the City Centre and the West End when approached from Millbay and The Hoe, including the use of high quality architecture. 3. Proposals explore ways to provide areas of public space which actively engage with the built volumes and uses, to create pedestrian routes through the area, and contribute to the creation of a better public space at Derry’s Cross.

This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

Strategic Objective 8 To consolidate the existing concentrations of leisure and cultural uses to the south and west of Royal Parade, and of civic functions to the south and east of Royal Parade. These areas are already characterised by a variety of cultural uses around Derry’s Cross, centred on the Theatre Royal, and civic uses such as the Guildhall, Magistrates Court and St Andrew’s Church to the east of Armada Way. These characteristics should be strengthened and enhanced, by: 1. The creation...
of a new public space at Derry’s Cross, which provides a better setting for the Theatre Royal and a gateway to the West End. 2. Support for existing leisure uses and encouragement for new leisure, cultural, office and residential developments to the west of Armada Way which will improve the attractiveness of the area, create links to the Hoe and Millbay waterfronts and support the creation of a public space at Derry’s Cross. 3. The conservation and enhancement of the area to the east of Armada Way as an important part of Plymouth’s past and the route to Sutton Harbour and the Barbican, and as the focus of civic functions such as the Magistrates’ Court and Guildhall.

This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

[Please see note in Part One about the designation and use of the word ‘culture’ in the context of the wider aspirations for the city and the ambition to create cultural anchors in the city as well as retail structures.] 10.1 This area includes the University of Plymouth campus, North Hill, Tavistock Place and the Plymouth College of Art (PCA) and environs. It also includes the City Museum and Library, various venues, cafes and exhibition spaces. Please delete - and has become known as the ‘Cultural Quarter’.

This plan is looking up to 20 years ahead. Keeping this in mind...
Please make detailed comments about the plan here:

Strategic Objective: 6 To drive forward the economic regeneration of the City Centre, and contribute to the city’s economic growth plans through the creation of a focus for a new business services sector in Plymouth. To improve the gateways to the city and the City Centre, and create an improved environment and true spine route between the waterfront and the station, and beyond. This will be achieved by: 1. The identification of a substantial new office-led mixed use development to drive forward the regeneration of the City Centre and to signal a strong cultural identity for the city as a whole. 2. Integration of the University and complementary uses. 3. The creation of a modern and attractive railway station, which is more accessible from the City Centre and which is a high quality gateway to the city. 4. The gradual change of the ‘northern triangle’ of the City Centre from retailing to predominantly offices, residential and student accommodation. 5. Strengthening the character of Armada Way as a key link north and south through the new developments. [CC14 and CC15 proposals for North Cross and The North triangle should not preclude cultural/leisure uses.]

Comment by Mr Adrian Vinken
Comment ID CCPS131
Response Date 20/10/09 16:54
Consultation Point Chapter 8: The Core Retail District (View)
Status Processed
Submission Type Email
Version 0.2

This plan is looking up to 20 years ahead. Keeping this in mind...

Please make detailed comments about the plan here:

Culture/leisure uses should not be precluded from this area.

Comment by Mr Adrian Vinken
Comment ID CCPS130
Response Date 20/10/09 16:54
Consultation Point Policy/Proposal: CC 10 The Heart of the Market and Independent District (View)
Status Processed
Submission Type Email
Version 0.2

This plan is looking up to 20 years ahead. Keeping this in mind...
Please add any further comments here:

Policy/Proposal: CC 10 The Heart of the Market and Independent District
The role of the City Market will be strengthened as the heart of the Independent District and hub of the West End. The block comprises the Market and a mix of independent units and larger retail units linking the West End with Armada Way. It plays a number of roles and should continue to provide a mix of retail, residential and other City Centre uses. Proposals for development of any part of this block should:
1. Give more prominence to the Market by possibly removing units along its frontages to order to allow views into the central market area.
2. Create a greater diversity of uses in the Market, including local food outlets and space for cultural and community activity.
3. Create opportunities for the improvement of units and shop fronts along New George Street, Cornwall Street and Armada Way.
4. Seek opportunities to create an arcade of higher value, boutique style retailers and other uses, breaking through the block and linking Cornwall Street (West) and New George Street (West).
5. Seek opportunities for new homes as part of any redevelopment proposals.

Comment by Mr Adrian Vinken
Comment ID CCPS129
Response Date 20/10/09 16:53
Consultation Point Policy/Proposal: CC 3 City Centre Public Realm (View)
Status Processed
Submission Type Email
Version 0.2

This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

Policy/Proposal: CC 3 City Centre Public Realm
The City Centre’s public realm will be improved to create a succession of safe, attractive, inclusive and innovative linked spaces, places and features which enliven the City Centre whilst respecting its unique Beaux Arts character. Public realm improvement schemes should:
• Use high quality, durable and sustainable designs and materials.
• Facilitate movement and promote permeability through the City Centre precinct for pedestrians and cyclists.
• Provide flexible design solutions which support the future development options suggested within this Area Action Plan.
• Provide a variety of spaces both in terms of scale and character, including:
  1. Events and spectator spaces.
  2. Group gatherings.
  3. Smaller seating areas.
  4. Places for all ages, including spaces and activities for children’s play and for young people.
• Use innovative designs to improve the identity and legibility of the City Centre such as public art, sculpture, planting, water features and lighting.
• Support the principle of legible streets – allowing views down boulevards to help people orientate themselves and understand the City Centre.
• Provide for a range of uses which support the retail needs of the city such as street markets, promotions, performances, events, pavement cafes.
• Encourage spaces for activities and entertainments which create an environment which is stimulating and attracts visitors to the City Centre, recognising these as an important part of the cultural infrastructure of the city.
• Include high quality structures for catering, displays and tourist information within public spaces, whilst mitigating street clutter and without reducing permeability and flexibility.
• Explore ways to provide cover over the main shopping streets, and incorporate protection from the weather to provide shade, shelter, urban cooling and sustainable drainage.
This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

To create a modern, enlivened City Centre which successfully integrates its historic assets with its new developments, and which uses attractive and innovative public spaces to create high quality settings for key buildings. New developments and public realm schemes use the latest sustainable construction methods and facilitate the use of Combined Heat and Power throughout the City Centre. This will be achieved by: • Ensuring that the grid of streets in the City Centre (Armada Way, Royal Parade, New George Street, Cornwall Street and Mayflower Street) remains as the underlying structure of the City Centre and is celebrated as the essence of the Plan for Plymouth. • Conserving and enhancing the best, highest quality buildings and elements of the Plan for Plymouth, and older buildings, as important parts of the City Centre’s heritage. • Linking these areas into proposals to redevelop and alter the City Centre, to create a City Centre which celebrates and recognises its history. • Creating a high quality, attractive and enlivening public realm, with a range of public spaces, enriching activities and sights which will generate interest. • Requiring development to be low carbon, and to facilitate the provision of Combined Heat and Power facilities. • Ensuring that the diversity of uses and cultural activity engage with the public realm and contribute to the development of a balanced evening/night time economy [Ref LDF Core Strategy SO8]
Please make detailed comments about the plan here:

Chapter 4 A Regional Destination Strategic Objective: 1 To deliver the regional commercial centre and cultural destination for the South West Peninsula of England. This will be achieved by: 1. Implementation of about 100,000 sq.m. of new high quality retail floorspace and 100,000 sq.m. of new high quality office space by 2021, bringing Plymouth into the top 10 commercial centres in England. 2. Delivering a vibrant mix of activities and experiences for the visitor, and a centre of such quality that Plymouth becomes a major cultural destination in its own right throughout the South West region. 3. Delivering a modern, efficient, attractive and safe transport system, with high quality car parks and public transport. 4. Delivering the ‘greenest’ City Centre in the country, with a state of the art low carbon energy network and high quality green spaces and public realm. 4.3 When these aims have been achieved, Plymouth will be the regional commercial centre servicing the south west peninsula. It will provide a diversity of experiences, cultural and leisure attractions, complementing those found in Bristol and supporting a much wider area, including the smaller centres of Truro and Exeter. Plymouth will fulfil its role as the main regional destination of the south west peninsula.

Comment by Mr Adrian Vinken
Comment ID CCPS126
Response Date 20/10/09 16:49
Consultation Point Chapter 3: The Vision for the City Centre. (View)
Status Processed
Submission Type Email
Version 0.2

This plan is looking up to 20 years ahead. Keeping this in mind...

Please make detailed comments about the plan here:

Chapter 3 The Vision for the City Centre 3.3 It is a spatial vision, in that it does not focus only on land uses and their distribution, but also on: • Balancing the commercial realities that underpin the area’s potential for change and the deliverability of the AAP’s ambitions to create a real ‘downtown’, 24 hour experience, with the need to integrate the best parts of the historic townscape, building and spaces, as key assets in promoting a high quality built environment, supporting the area’s role as a vibrant city centre. • Delivering the regional and sub-regional commercial offer. • How to develop the City Centre as a special form of sustainable neighbourhood, where the mix of uses is inextricably linked to the quality of the urban environment and a strong cultural identity, making it an attractive place to both live, work and visit, and in doing so, supporting the commercial health of its role as a sub-regional and regional shopping centre and the cultural health of its role as a vibrant city and destination for the far south west.

Comment by Mr Adrian Vinken
Comment ID CCPS125
Response Date 20/10/09 16:48
Consultation Point City Centre and University Area Action Plan - Pre Submission (View)
This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

Thank you very much for coming to the Plymouth Culture Board (PCB) meeting on 15 September - particularly at such short notice. Your presentation was very pertinent to the concerns of the PCB, and gave us much food for thought. We will certainly take up your suggestion of inviting Hannah Dempsey to come along to talk about the LDF as a whole. Here is our feedback on the pre-submission draft of the City Centre and University Area Action Plan. It is in two parts. The first sets out our thinking, and the second comprises suggestions for slight (though significant) changes to the wording of the AAP.

As promised, this feedback is intended to be both positive and helpful! Part One First, we warmly welcome the draft AAP and its vision 'to reinforce the City Centre's role as a vibrant and thriving regional destination, providing high quality shopping, recreation, cultural, civic, education and commercial facilities, well connected to surrounding neighbourhoods as well as being a safe place of quality in which to live'. We believe that cultural assets and opportunities have a great (though still largely untapped) part to play in the business of regenerating the city centre, and the draft AAP represents a move in the right direction. Second, we would recommend adopting a broader-based conception of 'culture' than the draft currently uses. As set out in The Vital Spark: a cultural strategy for the city of Plymouth 2009-2020, culture is more than the arts. The PCB supports the DCMS view (echoed in People Places and Spaces: A Cultural Infrastructure Development Strategy for the South West of England) that culture has both a material and a value dimension. The material dimension encompasses things like:

- performing and visual arts, music, crafts and fashion
- film, television, interactive media, games, digital technologies
- museums, artefacts, archives and design
- libraries, literature, writing and publishing
- built heritage, architecture, natural and marine landscapes and archaeology
- cathedrals, churches and places of worship
- sports events, facilities and development
- parks, open spaces, wildlife habitats, coastal environment, countryside and outdoor recreation
- children's play, playground and play activities
- tourism, festivals and visitor attractions
- informal leisure pursuits [including shopping]

The value dimension embraces things like:

- relationships between individuals and groups, sense of belonging and self-esteem
- shared memories, experiences and identities
- diverse cultural, faith and historic backgrounds
- social standards, values and norms
- what we consider valuable to pass on to future generations

The PCB's starting point is that culture is the vital spark that makes a city vibrant. Culture is eating out at Chloe's or Tanners, taking in a show at the Theatre Royal or Pavilions, kicking a ball in Central Park, dancing at the Barbican Jazz & Blues Festival, sailing in the Sound, visiting the City Museum or diving down to HMS Scylla. These things are also part of Plymouth's creative economy, which is a key driver of the city's development, encouraging entrepreneurship, drawing spending into the city centre, providing direct and indirect employment, attracting visitors, generating inward investment and creating demand for goods and services. More than this, however, the culture of a place is the product of people's sense of pride, identity and connectedness; cultural activity provides a route for harnessing and developing local distinctiveness; and the physical cultural infrastructure (i.e. the buildings, facilities, places and spaces where culture happens) is the glue that holds it all together. In terms of place-making, an enhanced cultural offer is both a delivery agent as well as a delivery outcome, and it would be great if this dual aspect could be more robustly reflected in the AAP text. Third, we wonder if there would be mutual advantage in making explicit reference (in your evidence base) to those themes and objectives of The Vital Spark that connect most closely with the vision and aims of the AAP i.e. Culture and a wealthy city • To strengthen Plymouth's identity as a dynamic and distinctive cultural centre with equally strong appeal for residents, visitors and investors alike Culture and a safe and strong city • To ensure that culture contributes to a public realm that is vibrant, distinctive, well designed and sustainable Culture and a wise city • To extend opportunities for people to experience and originate recreational and leisure activities of the highest quality, as befits...
the city's size, stature and aspirations. Fourth, it might also be useful to mention other relevant strategies and initiatives, like Living Places, the Culture and Sport Planning Toolkit, and People, Places and Spaces (together with the role of the PCB as the Planning Area for Culture Partnership Group for Plymouth) as further evidence of the strategic interconnectedness of the AAP and the City Council's good practice in progressing the LDF. Fifth, we have a concern about the naming of a 'Learning and Culture District', not because we have any objection to your policy and proposals under this heading, but rather because a) when the 'c' word is used in this way, it ring-fences culture as the arts and creative industries, when - as we hope we have demonstrated - it is much more than that, and b) it can conceal the fact that culture has a major part to play in the development of all the Districts, particularly where 'shopping, recreation... civic, education and commercial facilities, [community safety], heritage, and [the creation of] new districts showcasing the best in modern design and architecture' are concerned. As we mentioned at the meeting, we see culture as something that should 'marble through' all aspects of the LDF process, including the City Centre and University AAP. We would even go so far as to say that in its desire to knit together different elements to 'tell a story of the City's development from its medieval beginnings to the 21st century' - the City Centre and University AAP is, and has to be, culture-led, and we challenge you to make this explicit in your formal submission to the Secretary of State!

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**Comment by**  
Mr Harry Vosper

**Comment ID**  
CCPS141

**Response Date**  
23/10/09 16:23

**Consultation Point**  
Strategic Objective: 4  
([View](#))

**Status**  
Processed

**Submission Type**  
Email

**Version**  
0.2

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This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

Objectives 4, 5, 7 and 8 are inconsistent with the aim of enlivening the centre by encouraging a rich variety of uses in the respective localities, because they tend to prescribe limited types of activity to take place there. Objective 6 to modernise the Railway Station and introduce modern office and hotel space is welcome as far as it goes but it stops short of specifying high quality development and inclusion of full transport integration as a Transport Hub, including bus station, airport and ferry links, cycle hire, convenient pedestrian walkways and City Centre electric minibus service for pedestrianised areas. Summary of recommendations 1 Address the potential lost opportunities, especially Transport Hub and thorough integration with surroundings, and rationalise access by private vehicles. 2 Delete definition of City Centre "Districts" as they may have a restrictive effect on potential development. Suggest use historic names instead, eg Derry's Cross, etc. 3 Introduce policies on tall buildings, restricting them to Railway Station and University areas. 4 Allow no building taller than 6 storeys in the rest of the City Centre 5 Encourage rich variety of uses in any area, with the exception of noisy, smelly or unsightly industrial uses, or other likely nuisances, bearing in mind all areas should also be residential. 6 Include the ring road within the Plan. 7 Protect existing public realm. 8 Protect and promote Plymouth's historic buildings and spaces, including post war "Grid". In the hope that these comments may be considered helpful and constructive, best wishes and yours sincerely,
This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

Objective 3: Safe and Accessible City Centre for all transport modes. As discussed in the second general point above, it is not practicable to allow private vehicles to move at current speeds around the ring road whilst providing safe, convenient and attractive access for pedestrians and cyclists from all directions. The move away from the Mackay et al vision described in paragraph 6.8 would therefore be unacceptable. The ring road should be defined as being within the area covered by this Action Plan. A policy should specify the design of the ring road giving priority to pedestrians, cyclists and public transport and removing all fences and providing street wide pedestrian crossings at every junction with the ring road. Former junctions now closed off should be reopened for pedestrians and cyclists. Pedestrians and cyclists should be protected from each other by kerbs. A cycle hire scheme should be provided using Lyon or Paris as a guide, with numerous conveniently placed bike stations throughout the Centre and surroundings. Policies should provide for public transport as specified under Objective 1 above on the Transport Hub. Policy CC06 is not acceptable, as it is inconsistent with convenient and safe access for pedestrians and cyclists unless the streets are redesigned to limit vehicle speeds to 10mph. Policies should provide for convenient supervised park and ride locations on all major routes into the Centre and for fast, frequent and attractive public transport between the car parks and the City Centre. Paragraph 6.11 is inconsistent with this solution to the access problem. Policies should provide for convenient, safe and well lit pedestrian and cycle routes to surrounding areas, including University, Mutley, Barbican, Sutton Harbour, Cinemas, Millbay, Stonehouse, North Road and the Hoe. Policies should include transport co-ordinated with Ferry and Flight arrivals and departures, from the City Centre and the Station. Policies should include development of the Airport and incentives for its greater use by a larger number of airlines. Bus services should be much more frequent in the evenings until at least midnight to help enliven the City Centre.
This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

Objective 2: Placemaking. Overall objective agreed, but statement in 5.4 not agreed. Tall buildings should be confined to the Station and University area, see fourth general point above. A policy should include listing of all key buildings, trees and special landscaping features. A policy should provide for conduits to carry all services with attractive removable lids for ease of maintenance and avoidance of disruption to streets by utility companies. Decoration of conduit lids could help highlight the character of each street. A policy should specifically provide for the development of excellent market facilities to be more attractive as a destination than Tavistock Pannier Market. Plymouth also needs a much more frequent Farmers' Market. The shopping policy should be to make Plymouth the shopping destination of choice for Devon and Cornwall. This means not only national chains but also high quality independent shops, markets and high quality food and provisions shops.

Comment by Mr Harry Vosper
Comment ID CCPS138
Response Date 23/10/09 16:21
Consultation Point Strategic Objective: 1
Status Processed
Submission Type Email
Version 0.2

This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

Objective 1: The Regional Commercial Centre for the South West Peninsula. Agreed, but not with the sole emphasis on shopping. There are no policies which specifically address this objective. As a minimum, the provision of the fully integrated Transport Hub (see above) is a key requirement. A policy should include relocating the bus station to be very close to the railway station. A policy should call for the principle City Centre car parks to be located at the Transport Hub. A policy should call for concentration of new office, hotel and mixed use blocks and car parking in the immediate vicinity of the Station together with station and bus station concourse on a level with the top of Armada Way for easy pedestrian access to the rest of the Centre via Armada Way, and giving an immediate vista from the station to the Hoe. A policy should protect the planting and landscaping along Armada Way and enhance it with more effective water features and larger trees, whilst maintaining the vista from the top of the Way. This is a set of features unique to Plymouth and very attractive to pedestrians. A policy should call for covered moving pavements to ease passage of pedestrians and luggage from the Station to the Centre as far as Royal Parade or, alternatively, the provision of small electric mini buses from the Station along a designated part of Armada Way and its intersecting streets, and onwards to key destinations beyond (Barbican, University, Ebrington Street, Theatre, Millbay, etc) of such a frequency that there would always be a vehicle waiting to depart. These would also coordinate with the principle bus stops around the City Centre. A policy should ensure that the pedestrianised nature of the Centre be preserved and enhanced.
This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

This Area Action Plan has been totally rewritten since the last version, so it has been difficult to review it to see whether and how our previous comments have been incorporated. The comments below fall into two categories, firstly, general observations on potentially lost opportunities and, secondly, detailed comments on specific objectives and policies. General comments on potentially lost opportunities

Whilst many of the aspirations and analyses in the new plan are most welcome, the plan still appears to overlook some major opportunities. Firstly, the plan seems to focus on non-food retail shopping as the main source of regeneration and progress. There are other very important assets in Plymouth which merit equal emphasis, recognition and even celebration as key drivers of Plymouth's future. Properly developed, organised and promoted, these should include: - Tourism and closely related Heritage assets: the dramatic coastline, the Dartmoor National Park, the historic naval and military heritage, the unique post-war Town Plan and its iconic architecture, the Barbican and attractions of Sutton Harbour, especially the Aquarium, numerous nearby National Trust properties, Mount Edgcumbe estate and similar attractions - Plymouth as the Transport Hub for a large part of the Southwest, including all of Devon and Cornwall, demanding thorough integration of rail, air, local and international ferry routes and bus and coach services and all pedestrian links between them - Plymouth as a business centre particularly stimulated by the benefits of the Transport Hub - Plymouth as the major cultural centre in the Southwest, with its theatres, museums, galleries, Arts Centre, churches, TV and radio stations, clubs and bars and relevant university departments - Plymouth as a world class sports centre, especially including sailing and watersports, exploiting the vast area of relatively sheltered waters of the Sound and its many river estuaries, also swimming, ski slope, "historic" bowls, football, rugby - Plymouth as a centre of medical excellence including research and development - Plymouth as a world renowned centre of marine, marine biological and oceanographic engineering, plus environmental research - The University of Plymouth and its particular strengths - Plymouth as a gastronomic centre supported by a much improved food market and by its own fish quay and market, high quality food shops and wealth of good local produce from Devon, Cornwall and Brittany. This Action Plan should ensure that there is no valid reason for small places such as Tavistock, Totnes and Lostwithiel to be more attractive than Plymouth to people seeking top quality food. Secondly, despite its stated objective number 3, the plan fails adequately to provide for integration of the City Centre with its immediately adjacent surroundings, although this is vital for Plymouth's survival and growth. The ring road acts as a hostile barrier to pedestrians for most of its length. The ring road should be redesigned with no fences and to restrict vehicles to speeds of no more than 10 mph with pedestrian crossings all being very wide and on the level. Resurfacing with pavours and planting of trees along both sides and in the centre of the road would all contribute to discouraging of traffic and encouragement of people to come into the Centre. This integration would depend on excellent, co-ordinated public transport and park and ride facilities. The Western Approach is the probably the ugliest and most unattractive part of this ring road barrier and should probably be the first part to be redesigned. There are no policies which
specifically address this need for integrating the centre with the surroundings, but on the contrary,
plenty of emphasis on protection of the Strategic Road Network. It is unlikely to be possible to bring
traffic at 30mph to and all round the City Centre at the same time as giving pedestrians the priority
they need to encourage them into the Centre, unless the vehicles, not the people, are funnelled
underground. Forcing pedestrians above or below ground would be a significant deterrent to visiting
the centre. Thirdly, the plan recognises the large extent of the retail centre of Plymouth in comparison
with other major cities serving much larger populations, but fails to propose policies for major reduction
of this retail area. A policy to concentrate the major retail area to the east of Armada Way is probably
necessary, together with policies much broader than CC04 to encourage a very wide set of alternative
uses for all the land between Armada Way and Western Approach, ideally including open spaces with
cafes, restaurants, bars, shops, markets, offices, gardens, houses, theatres, cinemas, galleries, libraries,
schools, health centres and so on. Such a wealth of alternative uses would help bring life to the Centre
outside shopping hours. The tendency of the plan to describe separate districts for market, retail, office,
culture and leisure respectively works against the objective to enliven the Centre, as such “districts”
imply specialism rather than diversification. Fourthly, on height of new buildings: although there are
some specific policies protecting the existing, such as CC02, there is no policy protecting the skyline
in the Beaux Arts grid of streets and buildings. It is important to specify a policy which requires all new
building within that grid to be of a consistent height, matching that of the general height in the
neighbourhood, and neither taller nor shorter, especially on key frontages. However, the existing two
storey character of the Western Approach should be revised upwards to a general height of three to
six storeys, which could be considered as more appropriate to the City Centre location. There should
be a policy governing height of new buildings throughout the City Centre and its immediate surroundings,
which takes into account sun and shadow within the Centre and the view of the City from outside,
especially from the sea. Tall buildings, in Plymouth terms, of over 6 storeys should be confined to the
University and Railway Station areas. These lie to the north of the Centre and would therefore cause
no loss of sunshine within the rest of the Centre. This railway and University area should be a zone
where tall buildings are permitted, provided that they relate well to each other in terms of visual amenity
and practicality. For example, wind effects making life uncomfortable for pedestrians at ground level
should be precluded.

Comment by Mr McVeigh
Comment ID CCPS115
Response Date 30/09/09 15:27
Consultation Point Strategic Objective: 4 (View)
Status Processed
Submission Type Email
Version 0.2

This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:
The Strategic Objective 4 for the West End identifies that the area will be developed for market and
independent retail use. In particular, para 3 states that the West End will be safeguarded for small
independent retailers, we support this policy however we request that this should also make reference
to significant large scale retail development being focused to the east of Armada Way to ensure that
the West End redevelopment does not ‘dilute’ the retail critical mass which is required within Plymouth
City Centre.
Policy CC2 seeks to retain the Royal Parade Blocks. In general, we support the AAP’s approach to conservation within the City Centre and the broad objectives of CC2. The policy identifies the ability to sensitively alter the buildings where required, however will resist their loss or replacement. Whilst significant alterations to the buildings are not envisaged, we consider that the policy wording should be amended to allow for more substantial alterations if these were required as part of a large scale improvement/ redevelopment. On this basis, we propose the following amended wording: 'the blocks forming the norther side of Royal Parade are the best surviving examples of the quality that was envisaged in the Plan for Plymouth. Replacement of these buildings will not ordinarily be permitted, although it is recognised that it may be necessary to sensitively alter the buildings in order to retain viable, successful uses. In addition significant alterations may be acceptable as part of a wider retail regeneration scheme. In particular proposals which aim to widen the use mix of the buildings, introducing residential and office uses, may be acceptable as long as they retain active ground floor frontages.'
Cornwall Street West It is noted that within the draft document, the Core Retail District has been expanded to include Cornwall Street to the west of Armada Way. In particular Policy CC11 identifies Cornwall Street as the key area for retail led regeneration and identifies the Armada Way and Cornwall Street (west) as a suitable location for a new department store (25,000sqm). Whilst the regeneration of Cornwall Street is welcomed, subject to the comments above, we recommend that this policy should focus first upon redevelopment of buildings to the east Armada Way before expanding to the west. Any premature expansion to the west will weaken the retail circuit of Cornwall Street and New George to the east and damage the required critical mass by diluting footfall and the focus of activity and investment. Specifically, we request that this policy should emphasise a phased approach to retail within this part of the City Centre and state that significant new retail provision with Cornwall Street West shall only come forward if there is no capacity in the identified retail core to the east of Armada Way.

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Comment by Mr McVeigh
Comment ID CCPS112
Response Date 30/09/09 14:36
Consultation Point Policy/Proposal: CC 12 Drakes Circus and New George Street (View)
Status Processed
Submission Type Letter
Version 0.2

This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

We write on behalf of our client PruPIM in relation to the above document which was published for consultation in August 2009. As previously stated, PruPIM are major landowners within Plymouth City Centre and have an interest in the future development of the City. Our clients are wholly supportive of the Council’s intention to enhance the position of the City centre and are broadly supportive of the aims and objectives of the AAP. However, we wish to make the following comments in relation to the consultation document. Please note that these comments follow on from our previous representations to the issues and Options (December 2008) and Newsletter consultations (24 June 2009) and the discussions which have been held with Council Officers. Our representations are set out below. New George Street Our key concern relates to the emphasis placed on new George Street and Drakes Circus within the draft document. Policy CC12 states that this is a core retail circuit which should be enhanced through improvements to the units. However, the significance of this area should be emphasised further in the wording of this policy. In particular, it is considered that New George Street offers the greatest opportunity for the delivery of retail regeneration in the short to medium term. The majority of the property of New George Street are within one ownership which allows for the delivery of large scale improvements and alterations. In addition, the existing units are large in comparison to other locations within the City Centre and offer the opportunity to adapt and respond to the need of different tenants. In comparison, the retail units on Cornwall Street east do not allow for this flexibility and do not fall within one ownership which makes delivery relatively less viable in the short to medium term. This is identified within the Investment and Development Strategy (2008) which states: ‘The scale of Cornwall Street is plainly wrong and too low and this should be taken into account in assessing all the buildings along its length. The quality of the finishes and detailing is in most cases not of high quality and represents the fact that Cornwall Street was ‘off pitch’ in retail terms even when it was first
built.' On this basis, we request that Policy CC12 is strengthened to state that New George Street should be the focus for significant retail regeneration within the east of the City centre ahead of other locations including Cornwall Street.

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**Comment by** Dr Michele Kiernan  
**Comment ID** CCPS79  
**Response Date** 29/09/09 12:56  
**Consultation Point** Chapter 9: The Northern Office District, North Cross and the Railway Station (View)  
**Status** Processed  
**Submission Type** Web  
**Version** 0.1

**This plan is looking up to 20 years ahead. Keeping this in mind...**

**Please make detailed comments about the plan here:**

I must object strongly to concreting over our lovely green and safe pedestrian and cycling route into the city centre and university. This is an absolutely terrible idea which will create the most horrendous local pollution problems where we currently have fresh air. Filling the space with office blocks will also hinder the progress of pedestrians and cyclists to the university and city centre. Parents with young children, the disabled and able bodied alike currently move freely in a green area completely protected from motorised traffic. What you propose will ruin this for ever, please think again. I cannot understand why there is a need to develop yet another ‘office core’ away from the current areas where offices are concentrated. Especially when there is still room for redevelopment nearer to the current office quarters (such as at Bretonside, which is currently a disgrace). I can only suppose that the university has put pressure on the council to allow its expansion into this area due to the constraints of its current site. However I feel that this will backfire on the university, because I have already heard prospective students saying they are put off by the lack of green space on campus. This is a wonderful attractive city in the most beautiful setting, please don’t spoil the best parts of it.

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**Comment by** Ms Maria Mills  
**Comment ID** CCPS116  
**Response Date** 02/10/09 12:33  
**Consultation Point** Policy/Proposal: CC 4 A Sustainable City Centre Neighbourhood (View)  
**Status** Processed  
**Submission Type** Letter  
**Version** 0.6

**This plan is looking up to 20 years ahead. Keeping this in mind...**
Please add any further comments here:

The views set out below comprise the consultation response of the following community/residents groups: Adelaide Community Project Flora Court Tenants Association North Road West Residents Association Gloucester Court Residents Association King Street Residents Association Stonehouse Action Policy CC4. It is considered that there should be a recreation area in the city centre that is adaptable and provides for recreational needs throughout the year. It could be located in the Place de Brest, the Piazza outside Dingles or the area by the Eagle. The area could include fountains, play equipment and include an open air skating rink in the winter. The recreation area would reduce vandalism because it would encourage people to stay in the city centre later in the day/evening. There is concern that the policy suggests that new developments can rely upon the use of community facilities in neighbouring communities. It is considered that new developments should include all the necessary community facilities on site. If, in exceptional circumstances, existing community facilities in neighbouring communities are to be relied upon, the new development should fund the upgrading of these facilities in line with their increased usage and should similarly fund the upgrading of pedestrian links to them via a financial contribution etc secured by a S106 Agreement.

This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

Any developments which includes housing should have a minimum of 30% affordable housing in line with current core strategy policy. With this exception, the group wanted to add that it supported the policy.

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**Comment by** Ms Maria Mills

**Comment ID** CCPS122

**Response Date** 02/10/09 14:35

**Consultation Point** Policy/Proposal: CC 14 North Cross and the Railway Station (View)

**Status** Processed

**Submission Type** Letter

**Version** 0.2

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**Comment by** Ms Maria Mills

**Comment ID** CCPS121

**Response Date** 02/10/09 14:38

**Consultation Point** Policy/Proposal: CC 15 The Northern Triangle (View)

**Status** Processed

**Submission Type** Letter

**Version** 0.2
This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

The views set out below comprise the consultation response of the following community/residents groups: Adelaide Community Project Flora Court Tenants Association North Road West Residents Association Gloucester Court Residents Association King Street Residents Association Stonehouse Action

Any access between Stonehouse North and the University should be well lit and accessible to all users.

Comment by: Ms Maria Mills
Comment ID: CCPS120
Response Date: 02/10/09 14:37
Consultation Point: Policy/Proposal: CC 10 The Heart of the Market and Independent District (View)
Status: Processed
Submission Type: Letter
Version: 0.2

This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

The views set out below comprise the consultation response of the following community/residents groups: Adelaide Community Project Flora Court Tenants Association North Road West Residents Association Gloucester Court Residents Association King Street Residents Association Stonehouse Action CC10 and CC11

Any development which includes housing should have a minimum of 30% affordable housing in line with current core strategy policy.

Comment by: Ms Maria Mills
Comment ID: CCPS119
Response Date: 02/10/09 14:26
Consultation Point: Policy/Proposal: CC 8 Colin Campbell Court (View)
Status: Processed
Submission Type: Letter
Version: 0.2
This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

The views set out below comprise the consultation response of the following community/residents groups: Adelaide Community Project Flora Court Tenants Association North Road West Residents Association Gloucester Court Residents Association King Street Residents Association Stonehouse Action There is concern that high-rise development could overshadow neighbouring developments/communities and result in overshadowed ‘dead areas’. To this end, we consider that buildings should not exceed six storeys, to enable natural light to be used effectively. The ‘art deco’ building towards the south-east corner of Colin Campbell Court is a building of significant architectural merit that should be retained in its present form as part of any proposal to redevelop the wider area. It could be used as a community centre or cultural centre - mindful of the aim to provide community facilities within convenient reach of residents, and the building's location within the 'cultural quarter'. Redevelopment will entail the loss of existing social housing stock within Colin Campbell Court. With this in mind, the statement that no affordable housing will be required as part of any redevelopment is a major concern. Whilst understanding the need to secure redevelopment of the area, the removal of existing social housing in this area and redevelopment of the area with 100% open market housing would be at odds with the government objective to build mixed communities. Moreover, the overwhelming need for social housing in the city should not allow for the acceptance of reduced affordable housing levels. In view of the above, a reduced quota of 25% affordable housing is considered more acceptable. We are not opposed to a major foodstore (see p.40, paragraph 7.9) but do not wish to attract a discount retailer. However, we are concerned about the size quoted of 11,000sqm and the implications for parking, access for vehicles and traffic. It would not bring added business to surrounding areas as people would shop and leave.

Comment by Ms Maria Mills
Comment ID CCPS118
Response Date 02/10/09 14:20
Consultation Point Policy/Proposal: CC 6 The Strategic Road Network (View)
Status Processed
Submission Type Letter
Version 0.2

This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

The views set out below comprise the consultation response of the following community/residents groups: Adelaide Community Project Flora Court Tenants Association North Road West Residents Association Gloucester Court Residents Association King Street Residents Association Stonehouse Action The criterion should seek to provide new or improve existing street level access across the road into neighbouring communities.
This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

The views set out below comprise the consultation response of the following community/residents groups: Adelaide Community Project Flora Court Tenants Association North Road West Residents Association Gloucester Court Residents Association King Street Residents Association Stonehouse Action Although the stated objective is to provide a safe and accessible city centre, the word accessible does not appear in any of the criteria, the aim should be to improve access to/from the city centre for those living outside it. Pedestrian accesses should be at street level, well lit and safe during the day or night for use by able bodied, wheelchair or pushchair users. Cobbles should not be used as they are not suitable for wheelchair or pushchair users.

This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

I am writing to you with regard to the proposed city centre plan as reported in the Plymstock Shopper newspaper. I am, unfortunately, not able to attend the dates designated for final comments and consultation with the public but i do not want to lose the opportunity to make my views and wishes known. I understand that a major new department store is planned. I wanted to express my views on this issue as I am very concerned that what I have been advised happened to Drake Circus is not
allowed to occur again. I understand that a golden opportunity to attract the John Lewis partnership to Plymouth was lost because they were invited after construction work had begun on the drake circus development and that, because of this, the space allocated for a department store was too small for a major player like John Lewis. I believe the acquisition of a John Lewis department store would be a major coup for Plymouth and long overdue in Devon. It would provide clear evidence that Plymouth has a major shopping centre at its heart. I am therefore writing to you to express my fervent wish that they are invited to Plymouth and that they are consulted as to their needs before any building work or final plans are made.

Comment by ms Maggie Bolt

Comment ID CCPS77

Response Date 29/09/09 12:03

Consultation Point City Centre and University Area Action Plan - Pre Submission (View)

Status Processed

Submission Type Email

Version 0.3

This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

PLYMOUTH CITY CENTRE AREA ACTION PLAN – CONSULTATION REPONSE Plymouth Arts South West (PASW) Please find below a response from PASW's planning resource, Mark Luck on behalf of PASW. This is followed by some additional comments from Maggie Bolt and Diana Hatton for PASW. They echo many of the comments in Mark's response below, but we wanted to keep Mark's consideration whole rather than edit it, which is why the information is presented in two elements. With thanks. Response follows: Public Art South West (PASW) Planning Associate) Comments Outline The AAP document covers a wide area of central Plymouth and sets out a significant level of aspiration for revitalising the city centre and University area. The timescale of the document covers the period up to 2021, and advocates large-scale changes to all of the sub areas identified. As a consequence the proposals and aspirations are generally broad brush but advocates improvements to the quality of the built environment as a key part of the process. Comments The document can be read as broadly encouraging a creative and potentially a public art approach, given its repeated references to achieving high quality and innovative public realm and new landmark developments in addition to an overall aspiration for a more mixed-use and vibrant city centre. The document has a clear structure but reads as a broad strategic plan, which results in it being rather all encompassing and somewhat superficial. In some ways as a spatial planning document it lacks graphic representation and diagrams to clarify the main principles and in particular the relationship between the identified development sites and the broader areas described. As such, the document could be said to be too comprehensive and covers too long a planning period leading to a repetition of broad aspirations of high quality. The document states that the vision needs to retain flexibility in order to be achievable but as such also lacks clarity and a firm direction. Looking at the city centre area as a whole there are some big issues to resolve. Particularly the amount of inward investment required to make a step change in the quality and vibrancy of the area; the detrimental impact of the existing highway infrastructure which fragments the area and maintains a lack of connection between areas such as the university precinct and the retail core over-emphasising the separation of land-use; and the need to provide a more tangible vision for the city centre in twenty years time. Although it is not always useful to be too radical with the evolution of
urban form, and there is much to be said for a sustained incremental approach to renewal and regeneration, there are some fundamental issues within Plymouth city centre that are not being addressed in the AAP. Key to this is the highway network and its physical affect on the modern city centre and traffic impact, which takes the 1943 planned vision beyond its reasonable limits. Cities such as Birmingham and Bristol have based their successful regeneration on the downgrading and softening of their inner circuit road, humanising traffic flows, making pedestrian connections and reallocating space for public transport. Significantly the short chapter related to movement and access does not provide a confident picture of how the transportation and modal shift to more sustainable movement will be managed, and as such it is difficult to envisage how the challenges of increasing footfalls, making connections and ultimately attracting investment to deliver the quality aspirations will occur. Arguably the agenda set out around CC6 is key to the future renaissance of the city centre and the suggestion of a series of detailed delivery plans to be drawn up alongside development proposals to deal with transforming the inner ring road into less of a barrier needs a clearer and comprehensive vision at this stage. One of the first impressions is that the document covers too wide an area and as such is broad brush resulting in repeated statements about high quality public realm and landmark buildings without any steer to give a greater understanding of the issues or what is meant. However both the timescale and the extent of the plan are required to deal with the strategic issues related to transport, longer term inward investment and developing a vision that is understood by key stakeholders. The document does not adequately articulate expectations fully, or make clear short term priorities for action and as such the section on delivery (chapter 12) includes a lot of ambiguity and uncertainty which may be true but does not portray a confident direction for change. Arguably too much emphasis is placed upon the planning application procedure as a delivery mechanism rather than a planned and co-ordinated approach through forward planning and masterplanning. As such their should be a greater role for developing the areas based strategies – which provide a starting point but are overly based on opportunistic planning principles - and site briefs once the overall strategic issues have been further developed as suggested throughout the document. The document does read as a broad strategic document, which includes a number of hooks on which other work can be hung. However if the roles of factors such as public art, public realm improvements and increasing mix and vibrancy are to be developed the scope and processes involved in pushing forward what is a significant agenda for change need to be clearer. For example the numerous key sites identified in the area sections need to be assessed further. Which sites will act as strong catalysts for change, which are likely to come forward first from private developers and does this best help to promote change? What are the priorities and can these be promoted creatively and physically through public realm improvements or public art projects to raise the profile and potential? How can areas be made more livable in the short term to encourage a mix of uses to develop, are certain housing types better suited to the city centre in the short-term i.e. students, live work, etc? Will aspirations change over time and how might the criteria for short-term changes given the economic climate differ from long-term aspirations? Does this reality raise a question about temporary work to change perceptions in preparing for what is significant change? How are key sites actively promoted through site briefs or other mechanisms, can these begin to better articulate the ambitions of landmark buildings and high quality public realm? In some ways it is hard not to advocate more of a graphic and evolving document along the lines of the Bristol City Centre Strategy, which has been able to respond to major physical change and as such the changing perceptions of future change that this brings. In addition it has been used to provide an ongoing picture of change and respond to in some cases quite radical re-evaluations of the different areas of the city centre as they have been affected by change. Specific points. Chapter 2: Context and History perhaps understates the cultural aspects of the city centre by concentrating on the retail aspects and historic buildings. If increased cultural activity is one of the things that will transform the city centre then how is this embedded in the past. 2.20 paints a negative picture of the public realm, perhaps at this point more could be made of the contribution of a creative public realm to the success of city centres and its potential within Plymouth to initiate wholesale changes. Chapter 3: The Vision for the City Centre provides an appropriate level of ambition and suggests an area where perhaps expectedly there is a requirement for a quality built environment. This can be translated to support a creative approach to design solutions and a role for public art although this is implied rather than specific. Strategic Objective 02: Placemaking again implies a creative approach to achieving an attractive and vital city centre. Perhaps along with explicitly stating that public realm schemes will use the latest sustainable construction techniques that the aesthetic, distinctive and creative aspects of the public realm should also be emphasised as an important aspect of the plan. Strategic Objective 04: West End and 3.11 indicates a key role for street theatre and street art but somehow seems to relegate the contribution of the artist as an entertainment activity rather that something that can be used to transform the fabric
and character of the area in a wider sense. By including this aspect under West End without a stronger statement in Objective 02 seems to imply that the role of public art is to be focused here rather than in other areas where the role of public art is less explicit. Chapter 4: A Regional Destination. Again this chapter should possibly try to give greater emphasis to the improved cultural offer to the region as a key contributor to a mixed and vibrant centre, and as part of the day/night offer. This is quite a brief chapter but could be added to better sell it’s potential for more intense and diverse mix of uses to service the wider area, including the destination points briefly touched upon and raising the stakes for both a creative built environment and public art led activity. Chapter 5: Place making in the City Centre. The expanded version of Strategic Objective 02 again implies a role for public art but is still not explicit in providing a role for artist collaboration. 5.2 goes on to include reference to art however this again seems to restrict this to engaging visitors rather than being inherent in the creation of a high quality city centre built environment Policy CC3 includes the role of public art adding to the legibility and hierarchy of the city centre and is welcomed. In 5.10 however is would be useful to include some objective evaluation of the recent improvements as a way of benchmarking the aspirations in the AAP. Have these recent examples met the quality expectations or are they falling short? What aspects are more and less successful? This will help to inform expectations of future work. The indication of developing a public realm framework as set out in 5.12 is potentially good, but needs to be developed broader that the two areas indicated. 5.17 should be developed to a more defined programme outlining the process of progressing this area of work and its relationship to major development opportunities. Policy CC4: A Sustainable City Centre Neighbourhood recognises the value of creative industries, which is welcomed, but perhaps limits potential by again linking this firmly within the West End. It could be argued that there is greater potential within the city centre area as a whole and these principles could be expanded by applying these aspirations more widely, whilst recognising the different approaches that this would bring and the potential for other sub-areas. Chapter 6: Movement and Accessibility. Notwithstanding the more fundamental issues above, there should be greater emphasis improving the pedestrian environment as a mechanism for encouraging the most sustainable form of movement as well as the need to radically shift peoples perceptions of public transport. Although these are touched upon the are areas where this importance pedestrian environment and links are understated. For example as part of the car parking strategy, routs from car parts are not emphasised as an important factor in encouraging people to park at the earliest opportunity and make more of the journey on foot, Again the motivation to walk further distances within the city centre can be improved by the experience of the public realm and key routes which can be in-turn enhanced by a broad public art approach to legibility and public space. Chapter 7: The West End. Here the role of public art is most explicit, however as with many of the area statement the mechanisms or phases of change might be more firmly expressed. Chapter 8: The Core Retail District includes for some degree of diversification of use including some residential component. These aspirations require a significant shift in perceptions to provide a successful residential environment particularly linked in with its connectivity to the north and east as well as the south. Again the role of a creatively led process to facilitate this could be emphasised. Chapter 9: The Northern Office District, North Cross and Railway Station, recognises the huge step change required to realise the aspirations of linking this area back into the city centre and the significant impact currently imposed by the highway network. In reality this area requires a significant masterplan or development framework to co-ordinate the expected level of change. The role of public art can again be significant in the remodeling of significant public spaces and connections to the North of Armada Way in establishing a new identity for this city quarter. Chapter 10: the Learning and Cultural District. This area currently possesses perhaps the greatest potential for using the arts to invigorate and intensify the identity of the area and which could then help to act as a benchmark for areas such as the West End. The role of artists to help reinforce aspirations for new landmark campus buildings and public realm improvements is understated. Chapter 11: The Leisure and Civic District. Likewise there is huge potential here for artists working in the public realm to echo and reinforce the uses and cultural activities which exist in the area. This is indicated to an extent with the remodeling of Derry Cross as a more active public space but is again not explicit. Development potential in this area comes across as being largely about the replacement or conversion of exiting plots or buildings and spaces, however the grain of the area is very fragmented by large buildings and car parking areas and as such a more radical approach to regeneration which might give greater intensity and vitality to the area over time could be considered. Conclusions The AAP is a key document for the future of Plymouth, and its revitalization and diversification as a city centre is perhaps too great a topic for this single document, which is characterised by it’s broad statements and aspirations. In truth the test of this document can only be expected to act as a co-ordinating mechanism for a number of more detailed studies and briefs that will follow. As such the document gives a number of hooks for public art, linked in with a more legible
and vital city centre as might be expected. A question that arises however is whether the ambition of the document is too great for the plan period (a period of just over 10 years) and if therefore greater focus is required to begin a transformation, which may well only be realized over a longer period. Each of the sub-areas identified could well be the subject of an AAP with the degree of change and investment that is envisaged. The role of artist has much to offer to the vitality and distinctiveness of the modern city centre, but the diversity and identity that will ultimately benefit the legibility of such a large area will only come about if a creative approach to city planning is at the heart of the regeneration process. If this is envisaged it is currently not expressed in this document. Mark Luck – PASW planning Associate – 09/09/09 Comments from Maggie Bolt and Diana Hatton PASW In general we feel that there is room for advocating a more creative and bold approach as befits the successor to the 1940’s vision. The role of public art at present throughout the document is relegated to the idea of art and sculpture enlivening the public realm. There are some good strong statements throughout the document encouraging quality of design, the need for innovation, and an approach, which encompasses all the potential uses of space and elements, which will make essentially a retail heart of a city attractive, vibrant and sustainable in a broader sense. It cites cities such as Manchester and Bristol which has much more diverse and attractive activities and uses than merely retail and more than Plymouth currently boasts although does not then follow through with any aspirations or proposals to achieve their approach. As an example, when you look at what Bristol are doing with Suzanne Lacy - who is currently engaged in a project in Bristol entitled The University of Local Knowledge, a collaboration between Knowle West Media Centre and Arnolfini, focussing on supporting an ongoing professional development programme for state of the art research between equal spheres of knowledge - community development, local knowledge, and contemporary art practices. How we try and feed through the need to make the city of Plymouth become a living entity that engages with its community? Surely then, there is a strong case to involve artists and creative thinking in a more joined up and strategic way, and to be frank, perhaps alongside other design professionals and interesting thinkers; so maybe championing ensuring that developers involve artists and creative thinking at masterplanning stages, having a design review approach which is high profile and has teeth, involving creative work throughout legibility, sustainability and design and not just public realm. If Plymouth is to become the exciting and user-friendly destination which is being sought, then a freer, more thoughtful and creative approach should be advocated. (The new post could take a lead in steering this through and ensuring, where appropriate, artist and design thinking across all 'boxes' - perhaps look at Milton Keynes as an example?). There is a need to reflect the thinking and work which is ongoing in Plymouth with regard to public art, so there should be some overarching reference to 'Vital Spark' - the cultural strategy for Plymouth and Lisa Harty’s report for West End - and recommendations on how these should lead on and inform certain developments - so that they provide the cultural framework reference for future activity.

Comment by Mr Bruno Moore
Comment ID CCPS111
Response Date 30/09/09 11:52
Consultation Point Policy/Proposal: CC 8 Colin Campbell Court (View)
Status Processed
Submission Type Email
Version 0.4

This plan is looking up to 20 years ahead. Keeping this in mind...
Please add any further comments here:

On behalf of our client Sainsbury's Supermarkets Ltd we are pleased to provide comments on the recently published Pre-submission version of the City centre and University AAP. As you will be aware our client is currently represented within the city centre area with a foodstore in the Armada centre. This store is considered to be the primary convenience offer in the city centre and as such acts as a key anchor for shopping activities in the city centre as well as providing a valuable food shopping destination for local residents. The existing Sainsbury's store is assessed to contribute significantly to the vitality and viability of the city centre. Following discussions at the recent meeting with our client, you will be aware that they are keen to maintain and improve where possible their offer and representation in the city centre. We note that the AAP identifies the aspiration to redevelop the Colin Campbell Court area and potential of anchoring this redevelopment with a new foodstore. In addition, the AAP identifies the Armada Centre, where our client is currently represented, as falling within the proposed northern office district where it is envisaged the new business sector of Plymouth will be focused, with a move away from retailing. In general, our client supports the Council's aims and objectives to regenerate the city centre where these objectives accord with PPS6 and and the emerging draft of PPS4. Our client is keen to maintain their existing representation in the city centre in the Armada centre but is also willing to consider any other opportunities to improve their representation in the city centre such as that which may arise from the proposed redevelopment of Colin Cambell Court. We would again clarify the need to maintain a balance of retail development in the city centre to encourage linked trips, meet the needs and aspirations of local residents and maintain the vitality and viability of the city centre. New development must be integrated with the existing to ensure a balanced city centre, which fulfils its role and function in the retail hierarchy. In this regard, the retention or replacement in kind of our client's store would be consistent with prevailing government policy for town centres. We trust that these representations are of assistance and we look forward to receiving clarification of their receipt shortly. In addition, we would welcome meeting again with representatives of the Council to discuss aspirations for redevelopment in the city centre.

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This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

Thanks for the opportunity to comment on this document. Whilst I have no specific comments on behalf of the County Council, I shall be interested to see how these ambitious proposals take shape. They certainly look good on paper, and I hope they become reality, they will improve Plymouth considerably.

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This plan is looking up to 20 years ahead. Keeping this in mind...

Please make detailed comments about the plan here:

City Centre and University Area Action Plan - Pre Submission Consultation Bride Hall Developments have been established since 1983 and have subsequently developed in excess of 5 million square feet of floorspace within the UK. This has been achieved through successful partnerships with over 200 landowners, occupiers, local government bodies and public and private organisations. Bride Hall has a strong track record in the implementation of town centre shopping developments and is currently assessing development opportunities within Plymouth City Centre around the West End. It is on this basis that we previously made representations to the Issues and Preferred Options consultation of the Area Action Plan and are now making representations to the pre-submission version of the AAP. The West End & Colin Campbell Court Our previous representations relating to the Issues and Preferred Options consultation concerned the approach that was advocated for the redevelopment of Colin Campbell Court. Bride Hall considered that restricting the site’s development to independent and niche retailers would not prove a viable development option or generate sufficient footfall to this part of the City Centre. Indeed the Council’s own advisers made exactly the same point. Following the changes made within the pre-submission document, Bride Hall is now supportive of both Strategic Objective 4 and Policy/Proposal CC8 (relating to The West End and Colin Campbell Court respectively), as it is now considered that this provides a flexible policy framework to enable the redevelopment of this important area of Plymouth. It is important to recognise the potential difficulties in developing this site and the exemption from the Core Strategy Policy to provide 30% affordable housing in any regeneration proposal is welcomed. However, Bride Hall also consider that the need to provide live/work accommodation and an energy centre as part of any proposals may impact on the deliverability of any redevelopment as these options have not yet been fully tested in either urban design and viability terms. Whilst such uses are supported in principle, it is considered that these will need to be examined in more detail as part of the masterplanning process to ensure that such uses are achievable and viable. It is therefore recommended that the wording relating to points 8 and 9 in Proposal CC8 relating to the need to accommodate live/work units and the energy centre, is consolidated to the following: Any masterplan for this area should include an assessment and illustration of how live/work units (incorporating exhibition space) and an energy centre can be provided at this location. These uses should then form part of any development proposals where appropriate. This will enable a robust assessment to be prepared taking into account site specific issues that will need to be addressed in working up development options and appraising the viability of proposals at this location. Further Issues I would also like to draw the Department of Development's attention to a typo. Point number 9 under policy CC8 I believe should read ‘heat and power’ not ‘heart and power’. I trust that the above information will be taken into account in the preparation of the submission version of the Area Action Plan and should any further information be required then we will be happy to discuss this with you.

Comment by Ms Rose Freeman

Comment ID CCPS108
This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

Thank you for the email of 18 August from Limehouse consulting The Theatres Trust on the pre-submission draft of the City Centre and University Area Action Plan. The Theatres Trust is The National Advisory Public Body for Theatres. The Town & Country Planning (General Development Procedure) Order 1995, Article 10, Para (v) requires the Trust to be consulted on planning applications which include 'development involving any land on which there is a theatre.' It was established by The Theatres Trust Act 1976 'to promote the better protection of theatres'. This applies to all buildings that were either built as theatres or are used for theatre presentations, in current use, in other uses, or disused. Due to the specific nature of the Trust’s remit we are concerned with the protection and promotion of theatres and therefore anticipate policies relating to cultural facilities. We support the Pre-Submission Draft with regard to Strategic Objective 8 and Policy/Proposal CC18 to create a public space at Derry’s Cross which will provide a better setting for the Theatre Royal. Allowing restaurants and cafes in an open plan settings will enhance theatre use for patrons coming to the evening entertainment venues which will enliven the surrounding area in the evening and provide regular custom for the new local bars and restaurants outside normal working and shopping hours. Your theatrical venues form a prized part of the community and their significance (both architecturally and culturally) has a local dimension in that they are popular places where families go and provide a focal point for cultural activity in the community. As such they immediately connect with the current debate around place making and sustainable communities. The Theatres Trust is however concerned that access to the theatre is not impeded by other proposals, such as those which could prevent disabled access and drop off, parking of trucks and vans for stage get-ins, broadcasting and other uses of theatre spaces. A theatre’s economic sustainability relies upon it being able to have unrestricted physical access for users. We request therefore to be consulted on any planning applications for the creation of the new public space and look forward to being consulted on further planning policy documents in due course.

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Response Date 30/09/09 11:25
Consultation Point City Centre and University Area Action Plan - Pre Submission (View)
Status Processed
Submission Type Email
Version 0.4

This plan is looking up to 20 years ahead. Keeping this in mind...

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Comment by Mr John Oakes
Comment ID CCPS75
Response Date 29/09/09 11:53
Consultation Point The concept (View)
Status Processed
Submission Type Email
Version 0.2

This plan is looking up to 20 years ahead. Keeping this in mind...
Please make detailed comments about the plan here:

We do not specifically object to any of the site/area specific proposals but have a few general points to make. The emerging strategy seems to be building in the flexibility and adaptability that will be essential in taking into account potential changes in the longer term. The need to build in flexibility to the strategy and its proposals is a key soundness issue and in general we welcome this. Our only concern is that in some cases this flexibility seems to leave readers of the plan a little unclear as to what is actually being proposed (because the possible uses being put forward are so wide and varied) and secondly, with this flexibility is the risk that it may allow proposals to come forward which don’t properly respect the cultural heritage of the City Centre. On connectivity and the linkages with the other AAPs in the Plymouth LDF, the plan generally makes the sort of references we would have expected. However, we would have expected its proposals to set out how it proposes to link the northern City Centre with Central Park. The LDF Core Strategy 30% affordable housing requirement is waived on the 3 key Strategic Development Proposals (CC8 -Colin Campbell Court, CC11 - Cornwall Street and CC14 - North Cross and Railway Station. At first sight, there is a conflict here with national planning policy (PPS3 – Housing – see para 9 and others) and Regional Spatial Strategy policy (SW RSS Proposed Changes Policy H1 – Housing Affordability and Policy H3 – Mix of Housing), as well as the Plymouth Core Strategy. These waivers should be justified by evidence, but the references to complexity and assembling a viable project for CC8 and CC11 are not really sufficient to form a judgement (we could not see any justification in the text of the plan in relation to CC14). You should satisfy yourselves that these waivers are necessary, and justify the departure from your objective to create a mixed and balanced community. No doubt you have evidence to support them, but you should be ready to convince the Examining Inspector, and it would be helpful to set out the main points of the justification in the reasoned justification. Also on affordable housing, the plan does not set separate targets for social rented and intermediate affordable housing (PPS3 para 29). It should be amended to reflect PPS3 in this respect.

Comment by Mr John Oakes
Comment ID CCPS74
Response Date 29/09/09 11:52
Consultation Point Chapter 6: Movement and Accessibility. (View)
Status Processed
Submission Type Email
Version 0.2

This plan is looking up to 20 years ahead. Keeping this in mind...

Please make detailed comments about the plan here:

Although generally supportive of this section we do have some concerns. Although the plan does define preferred locations for development as we would expect there appears little material on how the impact of these proposals will be addressed in transportation terms. There is little evidence that transportation modelling has taken place to underpin these proposals although it may be this is contained in the detail of the evidence base. Part of our concern arises because, as the plan acknowledges in paragraph 5.20, the City Centre is not far away from being designated as an Air Quality Management Area. Whilst we support the plan’s positive efforts to enable low carbon development, it looks on the face of it that the plan will attract more traffic to the City Centre with the growth envisaged and this seemingly will worsen the air quality problem. We would have expected clearer actions to address this. We would also like to see more reference in the plan’s proposals to integrating with the sustainable...
transport opportunities for mode swap on the approaches to the City Centre. One example would be the opportunities which will arise from the proposed new park and ride on the A38 at Deep Lane Junction. On a general note, it may just be our interpretation, but it seems to us that the approach of maintaining the ratio of car parking to retail floorspace is somewhat at odds with the low carbon credentials of the plan. The proposal for a new railway station in Policy CC14 is noted. However, in relation to its potential delivery, as far as we are aware, the proposal is not contained in either the Regional Funding Allocation or the Network Rail Route Utilisation Strategy.

This plan is looking up to 20 years ahead. Keeping this in mind...

Please make detailed comments about the plan here:

The vision in the document is supported and unpacks the Core Strategy vision in a suitably spatial way. Similarly, the strategic objectives are generally supported as is the clear emphasis on the delivery and monitoring of these objectives. We support the aim of enhancing the City's green credentials with a low carbon energy network and high quality public realm. The accompanying focus on sustainable construction methods and the plan's innovative and ambitious approach to the low carbon agenda in this section is welcomed. The plan also appears to take a reasonable approach to conserving and enhancing the City's heritage and establishing a sustainable city centre neighbourhood and this is reflected in policies CC1, 2 and 3. The content on place making and heritage looks to be based on a reasonable understanding of the key features and characteristics in the City Centre and their historic value and seems to contain a greater recognition of the historic environment of Plymouth than in the previous version of the plan.

This plan is looking up to 20 years ahead. Keeping this in mind...
Please make detailed comments about the plan here:

The Context and History This section is well written and gives the reader a clear understanding of the context to the AAP and sets out the key issues the City Centre faces, how the AAP can respond to these issues and the key tasks facing the AAP. It also tells a clear story which is both user friendly and set out in a logical format.

This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

General Comments This AAP is welcomed as another significant step in the development of the LDF for Plymouth. It seems to us to effectively build upon the Plymouth Core Strategy content for this part of the City set out in the adopted Core Strategy and is well presented and generally clear and concise. We are also pleased to see a focus on implementation and delivery, and note that flexibility is being built into the plan. We made detailed comments on this AAP at its last stage and are satisfied that our comments, in most cases, have been taken into account and addressed. We particularly welcome and support the way in which Sustainability Appraisal has been used to develop and improve this plan and in our view, as a result, this version of the plan is a better and far more rounded document than the earlier version. Examples of this improvement are in the way it now more clearly addresses the City Centre’s historic assets and on the greater emphasis it places on the low carbon agenda. It covers most of the areas we would have expected of an AAP and generally follow the relevant guidance set out in PPS12, Local development Frameworks, particularly paragraphs 5.4 – 5.6. Our comments are limited and in particular focus on a few areas of concern/potential conflicts with national policy or on areas where we see scope for improvement.
This plan is looking up to 20 years ahead. Keeping this in mind...

Please make detailed comments about the plan here:

We welcome the content of this section and support the emphasis on delivery and implementation that is evident throughout the plan. On job numbers we did have some difficulty in reconciling the various figures in the plan. Para 3.17, Key Development Outputs table, refers to 106,700 jobs to 2021? We assume this is an error? Para 12.10 refers to the figure of 24,000 new jobs in the TTWA (up to 2021?). Para 12.11 has the figure of 27,500 new jobs in the PUA and 42,000 jobs in the TTWA up to 2021 (or beyond?). It would be helpful for the plan to be consistent and to make it very clear which period and which geographic areas these figures relate to.

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Comment by: Mr Steve Gerry
Comment ID: CCPS107
Response Date: 30/09/09 11:21
Consultation Point: City Centre and University Area Action Plan - Pre Submission
Status: Processed
Submission Type: Email
Version: 0.2

This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

I write on behalf of the Plymouth Manufacturers’ Group (or ‘PMG’) – a body of some thirty years standing which represents the interests of the City’s major manufacturers. Despite the current recession, there are still over twelve thousand employees in the Plymouth manufacturing and engineering sector. Collectively we generate over £700m within the local economy annually. Having considered the City Centre and University Area Action Plan - Pre Submission document, the PMG are fully supportive of its objectives and in particular welcome its proposals for a new Plymouth Railway Station. The station is a major gateway into the City which is undoubtedly capable of shaping visitor’s perceptions of Plymouth – some of which will be our clients and suppliers. We are also generally supportive of the planned linkages with the University and the proposed creation of a new business district in the vicinity of North Cross. We believe that this will help to attract professional business services that our members currently have to seek from outside the City.

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Comment by: Jeremy Gould
Comment ID: CCPS106
Response Date: 30/09/09 11:03
This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

On behalf of the Plymouth Architectural Trust I would like to make the following representation with respect to the City Centre and University Area Action Plan, this is a summary of the principle concerns arising at our consultation event held on the 28th September 2009, our full and more detailed response will follow under separate cover. Accessibility and Movement The Trust regrets the departure of this AAP from the Core Strategy and Mackay Vision for Plymouth with respect to the greening of the ring road. Having proposed a substantial increase in the net parking provision in the city centre, no clear case has been made for how the traffic on the ring road will be reduced to allow for the objectives of better cycle/ pedestrian access, improved sustainability/ air quality, improved connections to neighbouring areas and a more pleasant and attractive environment. Improved connections to the wider city including to the Barbican and Waterfront, The Hoe, Millbay and Stonehouse, North Hill and Central Park were felt to be of great significance to the success of the city and it was thought that the AAP lacked detail with respect to the relationship of this policy area to adjacent ones. In particular, the relationship of the city centre to the waterfront, Barbican, Bretonside (including the release of Charles Church from its road collar) was noted. Zoning Whilst the move away from the Quarters proposed in the last version of the AAP is welcomed, there remains a sense that zoning principles are still underpinning the policy. The idea of a business district and an independent quarter are supported. It was, however, thought that in particular the identification of a ‘leisure and civic’ district, the ‘learning and cultural’ district is limiting and misleading. We support the idea of place making in order to create a commercially and culturally healthy city centre and that cultural activity (culture in the broadest sense) should be integrated throughout the city centre to support diversity of uses and a balanced night time and evening economy. Doubt was expressed as to the viability of such a substantial increase in retail floor area and concerns raised about better integrating housing and communities into the city structure eg. reducing the barrier of the ring road to allow a better relationship between Stonehouse and the city centre. Historic Environment The increased emphasis on the importance of the historic city centre in this iteration of the AAP was welcomed. However, without greater assurance eg through a robust local listing policy the Trust maintains that the best mechanism for protecting the historic environment (as stated in its previous response) is through Conservation Area status. We do not believe that this is a barrier to development and if embraced will add significant value to the character and quality of the Plymouth offer, commercially and culturally. The detail of the integration of a substantial bus interchange on the very important Royal Parade, how Armada Way will develop, the integration of high level walkways and shading, the control of street clutter, the legibility of the city and the design of the public realm were areas of concern in relation to the historic environment and the way in which Plymouth is perceived by residents, visitors and investors.

Comment by R Everett
Comment ID CCPS70
Response Date 29/09/09 11:02
This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:
Please see attached.

Comment by
Ms Louise Baxter
Comment ID
CCPS105
Response Date
30/09/09 11:01
Consultation Point
Policy/Proposal: CC 4 A Sustainable City Centre Neighbourhood (View)
Status
Processed
Submission Type
Email
Version
0.2

This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

CC4 – City centre Sustainable neighbourhood I welcome the vision as a whole however I feel it is rather vague and clarification on exactly how a sustainable neighbourhood will be produced is needed. The immediate Mutley Greenbank neighbourhood has the potential to be such and yet due to neglect and little investment has been allowed to deteriorate and produce a much fragmented community. The council would do well to learn from other cities who have similar issues and have been able to turn things around and create sustainable and integrated neighbourhoods. Pt.6 ‘Facilities in neighbouring communities’. I support this idea in principle as there are existing community facilities in many of the immediate neighbourhoods provided by local third sector organisations. If a new city centre community was to be sign posted to these I would encourage greater support and investment into these. It is worth noting that Mutley Greenbank neighbourhood have no community facility and would welcome support in realising this vision, particularly as the cultural quarter sits within the neighbourhood.

Comment by
Mr Ian Hutchinson
This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:
Policy/Proposal: CC 13 - Land outside Drakes Circus I am in agreement that this site should be brought into use as public open space in the short term and could be used as an exemplar site of innovative public realm design and temporary public art commissions. Serious consideration should be made into what development this site should hold - a cultural venue could be considered. Whatever the development option is here, the continuation of excellent public realm and art would be essential.

Please make detailed comments about the plan here:
Further Comments It is essential that there is a rich ‘marbled effect’ of cultural provision, innovative solutions to the public realm/space and public art that runs through the city. With this in mind there needs to be consideration made to potential cultural use from the redevelopment/reuse of buildings within Plymouth. I am keen to know how the Barbican and Sutton Harbour Area Action Plan fits in with the City Centre Area Action Plan? Some of these points had been highlighted by the City Centre Public Art Steering Group during the public consultation round in November 2008. If you wish to discuss my comments then please do not hesitate to contact me.

Mr Ian Hutchinson
Please add any further comments here:

Policy/Proposal: CC 3 - City Centre Public Realm It is important to ensure that the Public Realm and Public Art developments are of the very highest quality, the creative approaches to the public realm/art must demonstrating strength of design and purpose. Plymouth must not over design its public spaces nor do nothing – coherent and meaningful solutions are required. No to public ‘broach art’ and public art ‘clutter’. The identification of locations and the acknowledgement for the need of both temporary and permanent public art works with in the city centre are needed. Has there been any thought as to how the quality of proposals/commissions/interventions are assessed and their implementation?

Comment by Mr Ian Hutchinson
Comment ID CCPS67
Response Date 29/09/09 10:42
Consultation Point Strategic Objective: 7 (View)
Status Processed
Submission Type Email
Version 0.2

This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

Strategic Objective 7 - The Learning and Culture District 3.14/10.1 The CCAAP ‘This area includes the University of Plymouth campus, North Hill, Tavistock Place and the Plymouth College of Art (PCA) and environs. It also includes the City Museum and Library, various venues, cafes and exhibition spaces and has become known as the ‘Cultural Quarter’ while this recognition of culture is very much welcomed, I would like to point out that this should not be the only area for cultural development with in the city. North Hill is as much a knowledge/education/learning district or quarter. Cultural infrastructure/activity should not be locked in to one zone or quarter within the CCAAP. The cultural provision needs to permeate thought the city centre. There are other cultural organisations in or near to the city centre; Plymouth Arts Centre, Theatre Royal, Athenaeum etc. These cultural anchors draw the public between key areas of the city.

Comment by Member of Parliament Linda Gilroy
Comment ID CCPS63
Response Date 29/09/09 10:41
Consultation Point City Centre and University Area Action Plan - Pre Submission (View)
Status Processed
Submission Type Web
Version 0.1
Have you made comments about the City Centre and University Area Action Plan before? Yes

Do you think your comments were listened to? Yes

This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

I welcome the document and congratulate all those involved in producing this work. It blends the best of what was originally conceived for and emerged from the post war reconstruction with the needs and potential of Plymouth today and tomorrow for a vibrant city centre. I welcome recommendation CC 4.2 (pg 27) assuming that this means that the proposal in para 6.1 of the City Centre and University Area Action Plan: Issues and Preferred Options Consultation - “It may be that the types of dwellings appropriate for the developments in the City Centre are not the types of dwellings most required to meet affordable needs” - which appears to dilute the City commitment to affordable housing - has been rejected. I would welcome more information about the type of housing and confirmation that affordability will remain a key element of housing development in the City Centre. With the need to meet carbon reduction and sustainable community goals affordable housing will be just as necessary in the City Centre and University Area as elsewhere. One of the impacts of turning houses into HMO’s to meet student accommodation needs has arguably been one of the things driving up property princes and contributed to the situation outlined in the study which I conducted with others (Filby, Moore and Rogers) in 2008. In this respect I also note recommendation 10.4, regarding tension between students and existing residents. I am pleased to see the needs of both communities recognised, and that this will be taken up in Sustainable Neighbourhoods DPD (para 10.9). I also note plans for student accommodation to move further into the City Centre and agree that this could ease current problems, and also help energise the City Centre. Linda Gilroy MP 29 September 2009

Mr Ian Hutchinson

CCPS66

29/09/09 10:40

Strategic Objective: 4

Processed

Email

0.2

This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

Strategic Objective 4: The West End – The Market and Independent District 3.11/7.4 It is important to highlight the wider public art agenda and creative opportunities possible. This should be carefully thought through with innovative and creative approaches to the design of place/space, road, deliveries and the ways in which they are to be integrated. Working with the local communities/businesses would be an essential part of this process.
This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

To deliver the regional commercial and cultural centre for the South West Peninsula of England 4.1 Plymouth as a regional destination must include the cultural offer alongside the commercial aspiration, by developing this combination Plymouth will attract a greater number of visitors to the city encouraging them to stay longer and spend more - Plymouth need to be more than a regional commercial centre.

This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

Strategic Objective 2: Placemaking 5.2 There could be some more explicit references to public art as well as creative uses of the public realm – there needs to be encouragement to move people/footfall around the city with innovate solutions and design. With the development of high quality environment, public spaces, public art and cultural facilities placed at strategic points across the city, provides destination points/anchors and linkages between shopping and commercial aspects of the city. In between these points the linkages can provide opportunities for public places and areas of distinction, some grand in scale and others small and secluded.
Have you made comments about the City Centre and University Area Action Plan before?  No

This plan is looking up to 20 years ahead. Keeping this in mind...

Do you think that it is the most appropriate plan?  Yes

Do you think the ideas suggested in the plan are flexible, realistic and deliverable?  Yes

Do you think the ideas suggested in the plan are backed up by facts and good research?  Don't know

Do you think the plan fits in with other local, regional and national plans and strategies?  Don't know

Please add any further comments here:

St Andrew's Church should be surrounded by open spaces as shown in the pre-war photo. This open space has now been halved in area. Also we have no parking space for our services for the Lord Mayor's visits and funerals (many of which are televised nationally). Further more the prominence of the church would be enhanced with floodlighting.
This plan is looking up to 20 years ahead. Keeping this in mind...

Do you think that it is the most appropriate plan?  No

Do you think the ideas suggested in the plan are flexible, realistic and deliverable?  Yes

Do you think the ideas suggested in the plan are backed up by facts and good research?  Don't know

Do you think the plan fits in with other local, regional and national plans and strategies?  Yes

Please add any further comments here:

In regard to office development specifically, there is a lack of ambition on what Plymouth could be. These plans support the assumption Plymouth is a second class city. Behind the likes of Exeter, Southampton and Bolton. When in fact much more could be achieved with what we get. The keeping of the Abercrombie buildings is another huge mistake this city will be making regarding these post war constructs. They limit the opportunity of growth through reducing the scope of planning professionals to devise innovative, fres, succesful and renowned developments. There should also be a memorandum of understanding between the Council and the University's succesful departments for example. So that the Council can provide non financial subsidies for law services and develop an industry and retention of highly skilled graduates in the city.
Do you think the plan fits in with other local, regional and national plans and strategies?  

Don't know

Please make detailed comments about the plan here:

This is a key space between two landmark buildings (Drake Circus shopping centre and the University’s Roland Levinsky Building), which for too long has been an eye-sore, when instead it should be a key open space activity in which pedestrians have priority. If you owned an out of town retail outlet, would you bring in clients by having purple boarding around a weed cover dump at the main entrance? The same is true here. The longer this eye sore remains in its present state, the fewer people and their money will be attracted to the city centre. There is clearly no possibility of developing this for offices, etc in the foreseeable future, so improving this as public open space must be a priority. It would cost little, but bring much benefit to Plymouth. In the long run too, this is likely the best use for this site.

Comment by Mr Andrew Young
Comment ID CCPS61
Response Date 28/09/09 20:24
Consultation Point Policy/Proposal: CC 3 City Centre Public Realm (View)
Status Processed
Submission Type Web
Version 0.1

Have you made comments about the City Centre and University Area Action Plan before? Yes
Do you think your comments were listened to? No

This plan is looking up to 20 years ahead. Keeping this in mind...

Do you think that it is the most appropriate plan? No

Do you think the ideas suggested in the plan are flexible, realistic and deliverable? Don't know

Do you think the ideas suggested in the plan are backed up by facts and good research? Don't know

Do you think the plan fits in with other local, regional and national plans and strategies? Don't know

Please make detailed comments about the plan here:

The plan still fails to appreciate the role of trees in providing scale, character and amenity. They should be an integral part of the overall design and assist with creating perspectives, framing views, dividing and linking spaces, while imparting a sense of pleasantness and belonging. The plan currently equates trees with public art, water features and sculpture. This is a serious misconception which is very likely to lead to disappointing results and the trees’ requirements for growth not being met. This has in fact
been the case with the recent public realm improvements cited at paragraph 5.10. The intention to
draw up a detailed City Centre Public Realm Framework is most welcome and we hope that stakeholders
will be involved in its development and have the opportunity to comment as drafting proceeds. We
consider that there is a definite need for a strategic-level plan that addresses the incorporation of new
and replacement trees into the urban fabric and the conservation of existing trees unless there are
compelling reasons for their removal. The plan reveals an excessive nervousness that future
developments may be constrained by public realm features. It is most evident in Policy CC03 where
“flexible design solutions are intended to support future development options.” The problem with this
approach is that the public realm could be prevented from reaching its potential and the aspiration to
“create a succession of safe, attractive, inclusive and innovative linked space, places and features”
may not be realised. Where access has to be safeguarded for future developments, the public realm
design should still be a finished product in itself but capable of being delivered in stages. This approach
would ensure that there is no pretext for short-cutting the design process and giving undue prominence
to one parameter – flexibility – to the detriment of others. The plan completely ignores Plymouth's
wealth of tree species in the City Centre, which is something that most cities would dearly love to have.
This 'unique selling point' should be actively promoted especially as the plant exploration aspects
reinforce Plymouth's theme "Spirit of Discovery". It is fully compatible with the need to provide a stronger
identity to the arterial linkages into the city centre and to aid spatial orientation. With good design, it
should be possible to use different tree species so that they contribute very strongly to place-making
and 'legibility'. There are in fact several good existing examples of this. The defects outlined above
and other minor points could be addressed by making the following changes to Policy CC03: Change
sub-para 2 to read: “Facilitate movement and promote permeability through the City Centre precinct
for pedestrians and cyclists.” Change sub-para 3 to read: “Be designed and implemented such that
the development options suggested within this Area Action Plan can be accomplished”. Change
sub-para 5 to read: “Use innovative designs to improve the identity, legibility and amenity of the City
Centre such as public art, etc.” Insert new sub-para 2 to read: “Use trees and shrubs effectively within
and between spaces, and along main roads, to provide scale, character and amenity”. Renumber the
succeeding paragraphs. Insert new sub-para 12 to read: “Seek to add to the wide diversity of tree
species which is one of the distinguishing features of Plymouth's City Centre.”

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Comment by: Mr Andrew Young

Response Date: 28/09/09 20:17

Consultation Point: Policy/Proposal: CC 13 Land outside Drakes Circus

Status: Processed

Submission Type: Web

Version: 0.1

Have you made comments about the City Centre and University Area Action Plan before? Yes

Do you think your comments were listened to? Yes

This plan is looking up to 20 years ahead. Keeping this in mind...

Do you think that it is the most appropriate plan? Yes

Do you think the ideas suggested in the plan are flexible, realistic and deliverable? Yes
**Do you think the ideas suggested in the plan are backed up by facts and good research?**

Don't know

**Do you think the plan fits in with other local, regional and national plans and strategies?**

Don't know

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**Please make detailed comments about the plan here:**

The plan recognises that shoppers require a high-quality environment but it should also mention that they like to sit and rest at times, and public spaces have to be suitable for the purpose. Currently, the spaces in and around Drake Circus are essentially thoroughfares. We are pleased that paragraph 8.19 identifies the need for better amenity close to Drake Circus and consider this needs to be reflected in Proposal CC13 as follows: Insert new sub-para 4 to read: “Elements of public open space”. The proposal to bring the site into use as public open space in the short term is most welcome.

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<td>City Centre and University Area Action Plan - Pre Submission (View)</td>
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**Have you made comments about the City Centre and University Area Action Plan before?**

Yes

**Do you think your comments were listened to?**

Not sure

**This plan is looking up to 20 years ahead. Keeping this in mind...**

Yes

**Do you think that it is the most appropriate plan?**

Yes

**Do you think the ideas suggested in the plan are flexible, realistic and deliverable?**

Yes

**Do you think the ideas suggested in the plan are backed up by facts and good research?**

Yes

**Do you think the plan fits in with other local, regional and national plans and strategies?**

Yes

---

**Please add any further comments here:**

This is a response on behalf of Plymouth Tree Partnership which brings together community groups, local organisations and conservation charities to work with Plymouth City Council on the conservation and improvement of trees in streets, parks and open spaces. We consider the plan captures the imagination and reflects the importance of achieving high-quality public spaces as part of a balanced development framework. We have particular comments on Policy CC03: City Centre Public Realm.
and Proposal CC13: Land outside Drakes Circus, and these are made in the relevant sections. If adopted, our comments will support the achievement of all of the high-level Sustainability Appraisal objectives.

Comment by Mr Martin Berkien
Comment ID CCPS58
Response Date 28/09/09 16:01
Consultation Point City Centre and University Area Action Plan - Pre Submission (View)
Status Processed
Submission Type Web
Version 0.1
Have you made comments about the City Centre and University Area Action Plan before? Yes
Do you think your comments were listened to? Yes
This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

These comments have also been sent in a letter from the university's Vice-Chancellor, Professor Wendy Purcell, to Barry Keel, the city council's chief executive. I was delighted that the City Centre and University Area Action Plan (AAP) formally incorporates the University of Plymouth and recognises the integration of our campus with the city centre and local community. I believe that the strategy and approach outlined in the AAP is key in helping Plymouth to deliver on its huge potential. I have taken the opportunity during the consultation period to bring this to the attention of all staff, who have had the opportunity to view the plans, ask questions in a face to face forum – at which the city council was represented – and to comment in writing. There was a very strong theme emerging from our face to face consultation that staff wish to see more community engagement and even stronger links with the city centre – including more waymarked ‘trails’, improved signage to, from and around the university and better use made of our ‘campus gateways’. All of these are issues that I shall pick up and that will further enhance the university’s integration with the city. The university has already commented on a previous iteration of the AAP (our comments were submitted on 12 December 2008 by Martin Berkien, Director of Learning Facilities) and this response builds on those comments as well as our previous representations to the Core Strategy in May and September 2006. We acknowledge that comments made at this stage in the AAP preparation process should not raise any new issues and should be focused on the “soundness of the document”. For this reason we seek to focus on any new contents within the document but may touch upon our previously raised comments to ensure that they are duly considered by the Inspector. I have asked my PR team to ensure that the comments are submitted online as part of your formal consultation process, but wanted to ensure that you were personally aware of our response. The university welcomes the forward-looking and ambitious nature of the proposals. In particular, we are pleased to note the following points. • The university largely welcomes the changes which have been made to the AAP between the Preferred Options Stage and this Pre-Submission stage. We particularly support the aspirations within Policy CC03, CC16 and CC17 regarding the use of spaces for events and the promotion of environmental and streetscape improvements in areas including the university. • The city council's aspirations to 'create a city centre worthy of one of Europe's finest waterfront cities' and the 'greenest city centre in the country' - and the
long-term strategic approach it sets out to achieve this are laudable. Due recognition is given to the fact that significant development will not happen overnight and that flexibility and small-scale, step-change will be part of the process • The proposed higher intensity of uses would increase activity levels and improve the safety of those who use the city centre and the university. • The proposed increase in retail capacity would enhance the overall attractiveness of Plymouth: the city still lags behind others, especially Exeter in its overall retail offer. • Due recognition is made of the university as ‘one of the city’s success stories’ and a major contributor to the economic, social and cultural wellbeing of the city: by continuing to work in close partnership we can deliver some of the more significant changes set out in the plan (eg at proposal CC16 the construction of more student accommodation, helping to bring vibrancy and more residential accommodation to the city centre; at proposal CC14 and policy CC15 creating a new gateway to the university campus at North Cross and a link to the proposed new business district by relocating our business school) • We particularly welcome recommendations that Drake Circus roundabout site is to be brought into use as a public open space in the short term – and that any long-term development must respect ‘its setting and relationship with the university and Drake’s Circus’ (proposal CC13). We believe that there is a strong case to re-think this area, based on the traffic ‘clutter’ and difficulties involved with the pedestrian crossing and would welcome being involved in any future discussions. • The university strongly supports the proposals for the northern office district. It provides an unparalleled opportunity to create employment opportunities in a sustainable location well served by public transport and in close proximity to the amenities of the city centre. The development would enable the university to further integrate physically with the city and improve the campus gateway. We will wish to work closely with the city council to make the most of potential synergies here. We have already indicated in principle that the university would seek to take up to 10,000 sqm (for a new Business School). Clearly the scope for small business spin offs and incubation units as well as businesses related to University research and enterprise activities is enormous. • The council’s recognition of the university’s achievements to date in ‘creating a high-quality campus, well connected to the city centre and surrounding neighbourhoods’ is appreciated. The university’s Strategic Development Plan (SDP) proposals include significant improvements to the public realm and therefore we would welcome this to be complemented by improvements within the city centre. Issues and questions that we wish to raise are identified below. • The university welcomes the principle of developing a ‘university and cultural district’ including Plymouth College of Arts and the University of Plymouth. However, we question the proposal to move the city library from North Hill which is at the heart of this education district and would request assurance that, in the event of a relocation, the space vacated would be retained for cultural and educational purposes. We also note that the district does not include the north eastern and far western part of the university campus. We would therefore seek assurance from the council that the designation for educational use can be preserved in respect of the area to the north east of the campus to the junction of North Road East and North Hill which is provided for in the current Local Plan, but falls outside the boundaries of the AAP. • Policy / Proposal CC4 is an all encompassing sustainable neighbourhood strategy for the city centre, however no mention is made of the contribution that education will make to a sustainable neighbourhood and the requirement for residents to have opportunities to access such facilities. • We believe that activity and vibrancy of the city centre will be enhanced by increasing the number of people living in the city centre. To that end the mix and type of housing should include a significant proportion of new, purpose-built residential accommodation for students. Whilst we note that student accommodation is referred to as potential new developments within Policy CC15 (The Northern Triangle), however the provision for student accommodation could also more broadly be referred to within Proposal CC4 (Sustainable Neighbourhood Strategy), Strategic Objective 7 (The Learning & Culture District) and CC16 (The University Campus). As an institution, the university has over 6,000 rooms – broadly equivalent to 1,050 individual properties – registered on its housing database, all within walking distance of the city centre. These are mostly in the Greenbank and Mutley area. Additionally there are several very large commercial letting agencies also serving the student population. Encouraging and supporting new purpose-built student residential developments in the city centre could release up to 2,000 small properties back for use by other groups in the housing market, with a resulting re-balancing impact on the communities of Mutley and Greenbank. This benefit to the wider city should therefore be picked up within the policy text, it will also potentially reduce the requirement to consider greenfield sites for new dwellings. • Whilst we welcome the inclusion of ‘movement, transport and accessibility’ as an issue that needs to be addressed, the statement that the university is ‘moving towards being a car-free campus’ is not the case. The Strategic Development Plan (SDP) for the university promotes a ‘pedestrian first’ environment which seeks to reduce car dependency and encourage the more sustainable modes of walking, cycling and public transport. We will also develop
the concept of negotiated space, characterised by the absence of street markings, encouraging different campus users to traverse the campus with mutual consideration and respect. This approach will be further enhanced by improvements to sustainable transport networks within the wider context. University staff would welcome the prioritisation of greener forms of transport across the city centre and wider city, not just on the university campus itself. • The university notes the aspiration for (Strategic Objective 3) improved parking within the city centre through the provision of a smaller number of, but much larger car parks that are high quality and easy to get to from the main roads. As noted above the University’s strategy is not to be car free but we are committed to working towards improved travel movements by sustainable travel modes. We note that more research is proposed regarding movements in and out of the centre and we would welcome involvement in key decision-making regarding future car parking provision within and around the centre which may potentially serve the university. • We understand that the ‘districts map’ is largely illustrative. Furthermore, we are keen to understand more fully how it relates to the northern office district. The university also seeks clarification as to whether the AAP will fully reflect the earlier designations of the wider area for education purposes in the adopted and First Deposit Local Plans. We also wish to seek reassurance that the promotion and identification of this district will not result in any undue restrictions on the implementation of our future development plans, and that the university will be consulted at the earliest possible stage of any proposals which may impact upon the district. The university would also welcome appropriate planning flexibility within the AAP policy to allow for consideration of the knock on benefits (in terms of investment into education facilities on the main campus) from disposal of university owned sites outside of the defined area when considering alternative higher value uses. • The university supports the priority given to securing community benefits in the city centre and university area through Section 106 agreements and other mechanisms. The university seeks to ensure however, that university development proposals are not unduly burdened by planning obligation requirements, and seeks acknowledgement that the educational benefits associated with university development should outweigh the requirement for planning obligations from such developments. We would be very concerned if the blanket tariff approach (in addition to a negotiated element) was applied to those schemes which have significant educational benefits. In particular, we are concerned about the financial burden of any requirement to contribute to the development of strategic road network development. • The council has not acknowledged the university’s commitment to corporate social responsibility and the significant progress it has made in addressing community relations issues (concerns are expressed about the erosion of communities in Greenbank and Mutley as the student population expands into these neighbourhoods - paragraph 10.9 under policy CC16). • During the staff consultation, a common theme that emerged was the need to focus on the attractiveness of the city centre, keeping it clean and litter-free and introducing more amenities for families. • University staff involved in the consultation expressed disappointment that it had taken place over the summer, when students were away. Thus a key group of stakeholders in the university and city’s future have been excluded from the consultation exercise. I hope that these comments are helpful to you in taking forward the AAP and I look forward to working with you to make the ambitions a reality.

Comment by Mr Alan Parsons
Comment ID CCPS57
Response Date 28/09/09 15:06
Consultation Point City Centre and University Area Action Plan - Pre Submission (View)
Status Processed
Submission Type Letter
Version 0.3

Have you made comments about the City Centre and University Area Action Plan before? Yes
Do you think your comments were listened to?  No

This plan is looking up to 20 years ahead. Keeping this in mind...

Do you think that it is the most appropriate plan?  Yes

Do you think the ideas suggested in the plan are flexible, realistic and deliverable?  Yes

Do you think the ideas suggested in the plan are backed up by facts and good research?  No

Do you think the plan fits in with other local, regional and national plans and strategies?  Don't know

Please add any further comments here:

Lack of toilet facilities. Concern over access for the disabled community I agree that the railway station should be redeveloped. Plymouth should have covered areas to protect people from the weather.

Comment by Ms Jessica Csere
Comment ID CCPS56
Response Date 28/09/09 15:02
Consultation Point Chapter 6: Movement and Accessibility. (View)
Status Processed
Submission Type Letter
Version 0.2

Please make detailed comments about the plan here:

Prams and pushchairs should be folded up before going onto buses as they obstruct access for people with mobility scooters/wheelchairs. Lack of respect for disabled travellers. This is not allowed on trains. Stop all traffic going down Mayflower Street by Drake Circus or anywhere in the City Centre. Better access to shops for disabled people.

Comment by Mr Edward Lees
Comment ID CCPS55
Response Date 28/09/09 14:59
Consultation Point Chapter 5: Place making in the City Centre (View)
This plan is looking up to 20 years ahead. Keeping this in mind...

Please make detailed comments about the plan here:

Some of the trees in Armada Way are too big and are blocking the view down to the Hoe. Tall buildings should be included in the main part of Millbay rather than on the ends of the Quay, protect the strategic views around the City Centre. Wind tunnels in the city centre are a problem and studies should be done on this to ensure any new development doesn't add to the issue. Sign posting from the city centre to the Barbican is not good - for example signs from the merchant house to Notte Street do not connect. I really like the new signs funded by the Co-op.

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Have you made comments about the City Centre and University Area Action Plan before? No

Do you think your comments were listened to? Yes, definitely

This plan is looking up to 20 years ahead. Keeping this in mind...

Do you think that it is the most appropriate plan? Yes

Do you think the ideas suggested in the plan are flexible, realistic and deliverable? Yes

Do you think the ideas suggested in the plan are backed up by facts and good research? Yes

Do you think the plan fits in with other local, regional and national plans and strategies? Yes
This plan is looking up to 20 years ahead. Keeping this in mind...

Please make detailed comments about the plan here:

I have checked recent minutes of the 'spatial planning and health' group which we convene here at public health, and which includes representation from PCC Planning staff, and I would like to send an additional comment. The group wished to formally comment on the AAP: “that the AAP should formally recognise the value of providing health services (both 'primary' and secondary' health services) in the city centre. Services provided in the centre can potentially be provided more sustainably and equitably (because it is easy for people to access the centre, including groups who may not easily access various scattered health service locations. Examples could include breast screening, sexual health, psychological therapies and walk-in GP services etc

This plan is looking up to 20 years ahead. Keeping this in mind...

Please make detailed comments about the plan here:
Delivery We believe that it will be desirable for there to be good public health involvement with the City Centres policies and proposals as they emerge, including via engagement with the City Centre Company. We hope the Council gives good opportunities for engagement with (eg) • A transportation/urban design masterplan for the Strategic Road Network • A City Centre public realm framework… Please do contact me if you have any queries about these comments. Thank you for your consideration of our views.

Comment by   Mr Andrew Pratt
Comment ID   CCPS50
Response Date 28/09/09 12:00
Consultation Point Policy/Proposal: CC 16 University of Plymouth Campus (View)
Status Processed
Submission Type Email
Version 0.2

This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:
CC 16 University of Plymouth campus Ensuring that the development and improvement of educational facilities in this area go hand in hand with the creation of sustainable neighbourhoods and considering the needs of existing residents…Safeguard and enhance the University as a vibrant, distinctive and diverse area of central Plymouth, taking into consideration the needs and requirements of the local community. Overall the policy can offer health and wellbeing benefits for many groups, but we would like the council to ensure that the rights and needs of existing non-student communities are explicitly protected and supported.

Comment by   Mr Andrew Pratt
Comment ID   CCPS49
Response Date 28/09/09 11:55
Consultation Point Policy/Proposal: CC 14 North Cross and the Railway Station (View)
Status Processed
Submission Type Email
Version 0.2

This plan is looking up to 20 years ahead. Keeping this in mind...
Please add any further comments here:
CC 14 North Cross and the railway station This policy needs to include the aspiration to also connect the city centre and station with the large green space resource of Central Park (see Central Park AAP) via excellent pedestrian and cycle and public transport links.

Comment by Mr Andrew Pratt
Comment ID CCPS47
Response Date 28/09/09 11:54
Consultation Point Policy/Proposal: CC 11 Cornwall Street (View)
Status Processed
Submission Type Email
Version 0.2

This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:
CC 13 Land outside Drakes Circus We believe it would be most positive for health to bring the site into use as public open space. It is also important to enable improvements to opportunities for pedestrian
and cycle movements around Drakes Circus junction, creating stronger links between the City Centre and University.

This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

CC 10 The heart of the market To give more prominence... greater diversity of uses... to the market, including the suggestion of increasing local food outlets, could support health and wellbeing by increasing the availability of affordable fresh food in a stimulating environment where social interactions are maximised. However it will be important that any new development do not exclude the existing stall-holders - and often lower-income customers - who use the market for a range of purposes. Please note that we have a regular public health promotion in the current market in recognition of the health promotion opportunities the market offers. This is an area utilised by many nearby residents for social as well as shopping needs. Before permitting a new major food store in this neighbourhood we suggest it would be vital to assess the prospective impacts of such a development on the AAP aspirations for an independent shopping experience and the vision of a distinctive and attractive independent quarter.

Have you made comments about the City Centre and University Area Action Plan before? Yes

Do you think your comments were listened to? Not sure
This plan is looking up to 20 years ahead. Keeping this in mind...

Do you think that it is the most appropriate plan? Yes

Do you think the ideas suggested in the plan are flexible, realistic and deliverable? No

Do you think the ideas suggested in the plan are backed up by facts and good research? Don't know

Do you think the plan fits in with other local, regional and national plans and strategies? Don't know

Please add any further comments here:

We support the plan in general but would argue that the "sectors" should not be enforced too rigidly. That was one of the main problems with the Abercrombie Plan which has left us with a shopping area with far too few houses.

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Comment by Mr Andrew Pratt
Comment ID CCPS45
Response Date 28/09/09 11:35
Consultation Point Policy/Proposal: CC 9 Morley Court and Harwell Court (View)
Status Processed
Submission Type Web
Version 0.2

This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

CC 9 Morley Court and Harwell Court The Council will look for opportunities to improve the quality of the homes in the Morley and Harwell Court areas, and will use these opportunities to provide more homes of different sizes and types, and also examine the potential for introducing other uses. Proposals should contribute to the creation of a sustainable neighbourhood of apartments and family homes, with associated community facilities. The possibility of including uses such as a health centre, managed workspace or live work units should be investigated. The wording for this policy is most welcome.

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Comment by Mr Andrew Pratt
Comment ID CCPS42
Response Date 28/09/09 11:31
Consultation Point: Policy/Proposal: CC 7 Policy CC07 – Royal Parade and Exeter Street (West) (View)

Status: Processed
Submission Type: Email
Version: 0.2

This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

CC07 – Royal Parade and Exeter Street (West) This policy is welcome and can improve the environment as described. Prioritising the proposed wider linear urban park could help promote health and wellbeing. However it may not be positive for overall health and wellbeing to propose an increase in car-parking capacity in the centre (as proposed in 6.11).

Comment by: Mr Peter Towey
Comment ID: CCPS43
Response Date: 28/09/09 11:29
Consultation Point: Chapter 10: The Learning and Culture District. (View)
Status: Processed
Submission Type: Web
Version: 0.1

This plan is looking up to 20 years ahead. Keeping this in mind...

Please make detailed comments about the plan here:

Strategic Objective 7 seems merely to require the Council to support the University's and College's aspirations - whatever they may be. This is not acceptable in a policy that will inform planning applications. It is giving them carte blanche to do what they like. There should in any case be much better opportunities at an earlier stage for the public to be able to comment on the University's and College's development proposals before they are set in stone. When did either body last consult the public about their plans? We are presented with a fait accompli which the Council then rubber stamp.

Comment by: Mr Andrew Pratt
Comment ID: CCPS41
Response Date: 28/09/09 11:25
This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

CC6 – Strategic Road Network This policy does not appear to give enough priority to promoting active healthy travel choices rather than private car access to the city centre. One of the city's key LAA targets aims to tackle rising obesity etc by increasing the number of people taking regular exercise. (This can often be better achieved by improving everyday active travel choices to work and services rather than providing gymnasiums and sports centres etc). Evidence suggests that: • Reducing private car access can support health if pleasant environments are provided for people to walk and cycle. • Less traffic will reduce the air pollution which this AAP specifically admits is becoming an increasing health and environmental problem in the city centre • Less traffic will also help reduce the severance and noise created by many of the city's central roads • Reducing private car usage is essential for the longer-term health and sustainability of our communities as the needs grows to reduce personal and collective carbon emissions and per capita consumption of natural resources.

This plan is looking up to 20 years ahead. Keeping this in mind...

Please make detailed comments about the plan here:

Affordable housing. ‘Development proposals will be exempt from the Core Strategy policy to provide 30% affordable housing. …although developers are still urged to look at whether an element of the housing provision can be affordable’ The availability of decent and affordable housing is important for health and wellbeing. We note the Council's decision to waive the Core Strategy requirement for the named city centre sites, but nonetheless urge the Council to encourage developers to include as much affordable housing as possible in any city centre developments.
Mr Andrew Pratt

Comment ID: CCPS40
Response Date: 28/09/09 11:23
Consultation Point: Policy/Proposal: CC 3 City Centre Public Realm

This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

CC 3 - City Centre Public Realm This policy deserves support for aiming to deliver an improved public realm which is stimulating and accessible should help improve health and wellbeing. To 'facilitate movement and promote permeability' for pedestrians and cyclists is vital. (Please note that CC3 (10) proposes providing cover over the main streets to provide protection from the weather etc. This could certainly improve the public realm in some cases but some exposure to the weather/ 'natural elements' is also important for health the natural elements as well as benefiting the health promoting green space elements of the city centre environment.)

Mr Peter Towey

Comment ID: CCPS38
Response Date: 28/09/09 11:19
Consultation Point: Chapter 9: The Northern Office District, North Cross and the Railway Station

This plan is looking up to 20 years ahead. Keeping this in mind...

Please make detailed comments about the plan here:

We note that in the proposals for North Cross and the Railway Station (CC14) the Council intends to exempt proposals from the 30% affordable housing requirement (though without giving any reasons!). Where will the affordable housing shortfall be made up? We need to avoid the "ghettoisation" of central Plymouth between rich and poor. If this proposal is because the council fears that developers are likely
to be put off by the "credit Crunch", we would argue that the plan runs to 2012 by which time the crisis will (we hope!) be long gone.

This plan is looking up to 20 years ahead. Keeping this in mind...

Please make detailed comments about the plan here:

We note that in the proposals for Cornwall Street (CC11) the Council intends to exempt proposals from the 30% affordable housing requirement. Where will the affordable housing shortfall be made up? We need to avoid the "ghettoisation" of central Plymouth between rich and poor. If this proposal is because the council fears that developers are likely to be put off by the "credit Crunch", we would argue that the plan runs to 2012 by which time the crisis will (we hope!) be long gone.

This plan is looking up to 20 years ahead. Keeping this in mind...

Please make detailed comments about the plan here:

The success of the plan for the West End will depend largely on better transport access to ensure that people from outside the area are encouraged to shop there. We note that in the proposals for Colin Campbell Court (CC08) the Council intends to exempt proposals from the 30% affordable housing...
requirement. Where will the affordable housing shortfall be made up? We need to avoid the "ghettoisation" of central Plymouth between rich and poor. If this proposal is because the council fears that developers are likely to be put off by the "credit Crunch", we would argue that the plan runs to 2012 by which time the crisis will (we hope!) be long gone.

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Have you made comments about the City Centre and University Area Action Plan before? Yes

Do you think your comments were listened to? Not sure

This plan is looking up to 20 years ahead. Keeping this in mind...

Do you think that it is the most appropriate plan? Yes

Do you think the ideas suggested in the plan are flexible, realistic and deliverable? Don't know

Do you think the ideas suggested in the plan are backed up by facts and good research? Don't know

Do you think the plan fits in with other local, regional and national plans and strategies? Don't know

Please add any further comments here:

We support the proposals for cyclists and pedestrians. Cycle lanes need to be wider and better separated from other traffic as they are on the Continent. There should also be a specific commitment to provide for disabled people. Care should also be taken to ensure that new developments do not cut across pedestrian routes as happened when Drake Circus was built across Old Town Street necessitating a wide detour on foot when Drake Circus is closed for the night. The planning department should have been aware of this effect and taken steps to prevent it happening.

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This plan is looking up to 20 years ahead. Keeping this in mind...

Please make detailed comments about the plan here:

We support the provision of a new high quality railway station with improved access to the Centre and we are very pleased that it should happen 2012-16. But the station also needs to be part of an integrated public transport system. At present few bus routes go anywhere near the station and even fewer stop there. Transferring the bus station there as recommended by Mackay would be a great help.

Mr Peter Towey

Comment by
CCPS33
Comment ID
28/09/09 10:58
Response Date
Policy/Proposal: CC 4 A Sustainable City Centre Neighbourhood (View)
Consultation Point
Processed
Status
Web Submission Type
Web Version
0.1

Have you made comments about the City Centre and University Area Action Plan before? Yes

Do you think your comments were listened to? Not sure

This plan is looking up to 20 years ahead. Keeping this in mind...

Do you think that it is the most appropriate plan? Yes

Do you think the ideas suggested in the plan are flexible, realistic and deliverable? Don't know

Do you think the ideas suggested in the plan are backed up by facts and good research? Don't know

Do you think the plan fits in with other local, regional and national plans and strategies? Don't know

Please add any further comments here:

We support the proposals to monitor and improve air quality in the City Centre.
This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

Network Rail would like to thank you for the opportunity to comment on the Plymouth Local Development Framework (LDF) - City Centre and University Area Action Plan planning document. Upon a review of this planning document Network Rail have the following comments to make. The comments relate specifically to Network Rail’s role as the agency responsible for delivering a reliable and safe rail network and also to maintain, improve and upgrade every aspect of the railway infrastructure. Strategic Objective 6 is considered to be of most relevance to Network Rail due to the potential for direct impact upon the operational railway. This objective, which is supported by Policy CC 14 - North Cross & Railway Station, sets out the Council’s aim for the creation of a modern and attractive railway station of which is proposed to be integrated and more accessible to the rest of the city centre. Network Rail would support this objective in principle. However; Network Rail will need to undertake further investigations in order to explore all available viable funding opportunities for a new railway station, in advance of progressing the proposals, in order to assess the feasibility of the Council’s aspiration. Whilst this objective is in its early stages, it is hoped that discussions will continue between the Council and Network Rail in order to examine all avenues towards creating an enhanced facility at this location. Please feel free to contact me if you have any queries in reference to the above.
Please make detailed comments about the plan here:

We strongly urge that the HQPT Northern Corridor is provided very much earlier than proposed. Para 6.1, 2nd bullet point, states "The operation of these corridors is key to the success of the City Centre." If so, late provision will undermine the overall plan.

Comment by Mr Peter Towey

Consultation Point Policy/Proposal: CC 3 City Centre Public Realm (View)

Have you made comments about the City Centre and University Area Action Plan before? Yes

Do you think your comments were listened to? Not sure

This plan is looking up to 20 years ahead. Keeping this in mind...

Do you think that it is the most appropriate plan? Yes

Do you think the ideas suggested in the plan are flexible, realistic and deliverable? Don't know

Do you think the ideas suggested in the plan are backed up by facts and good research? Don't know

Do you think the plan fits in with other local, regional and national plans and strategies? Don't know

Please add any further comments here:

We would like a specific commitment here to ensure that there is more city centre green open spaces ie gardens, grass and trees.

Comment by Mr Peter Towey

Consultation Point Chapter 3: The Vision for the City Centre. (View)
This plan is looking up to 20 years ahead. Keeping this in mind...

Please make detailed comments about the plan here:

More City Centre housing (which we support) will need more local infrastructure - schools, health facilities, community centres, etc. Also more will need to be done to ensure local employment is available. Will they all work in retail, offices or the University? The timing of provision is also important to ensure that housing, employment and facilities are all available at the appropriate time. Also the Centre should be protected from too many clubs, pubs & bars. That kind of nightlife culture scares away other people and results in a dangerous and unappealing centre. The Council needs to use its powers to ensure a much more balanced culture.

Comment by Mr Edward Keast
Comment ID CCPS28
Response Date 28/09/09 10:30
Consultation Point Policy/Proposal: CC 8 Colin Campbell Court
Status Processed
Submission Type Email
Version 0.2

This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

Colin Campbell Court This proposal has been in local plans since the 1980’s and has never got off the ground because it is considered to be unviable – even in two “property boom” periods. The Independent Inspector into the Colin Campbell CPO 2004 spelt out the reasons for this in no uncertain terms (see Clauses 169 – 178 of his report of 22nd March 2007). His final conclusion was that the proposal would not add to the long term viability and vitality of the City Centre and that there was not a compelling case in the public interest that the CPO be confirmed. Many years ago the Independent Inspector into the Adopted Local Plan reached the same sort of conclusions. Over many years a number of developers have tried to progress this development but all have failed to generate much interest from retailers. The recent development strategy relies on finding an “anchor tenant” but comes up with no ideas of who this might be. In the past Habitat, Kwik Save, Hypervalue and others have all tried to make a success of a business in this location and failed. Now they would also be up against competition from Aldi and Lidl in Union Street and your proposals for Cornwall Street. The fact is that the value of any completed development in this location would not cover the costs incurred in acquisition of buildings and businesses, infrastructure and construction costs and other development expenses. Drake Circus succeeded because values are three times as much at the prime “east end” of the City Centre. To continue to include this proposal in your plans for the City Centre is worse than useless because it perpetuates the “planning blight” from which this area has suffered for 20 years, the results of which are plain to see, being lack of investment in buildings and empty premises because of
reluctance to spend money on building up businesses in an area which might be redeveloped. So what should happen to improve the area? The Inspector at the CPO Inquiry covered this in Item 177 of his report when he said “Yet I consider that the Western Approach buildings could be refurbished to provide a more visually pleasing appearance. They could also provide retail outlets the same as, or similar to, those proposed. The car park could be developed for a retail and mixed use scheme incorporating the 1930’s Art Deco Colin Campbell House either through redevelopment or refurbishment. The Market Avenue terrace would require some little work to improve the rear.” The reality is that no major redevelopment of this area will take place in the foreseeable future. You have to make the best with what you have got – as with your excellent proposals for The Pannier Market. The improvement of existing buildings is in your own hands by enforcing repairing / decorating covenants in ground leases so would cost the Council nothing. If this proposal is removed from your plan and shadow of “planning blight” is removed then people would be prepared to invest in building up successful businesses in this area – as existed before the area was allocated for redevelopment.

Mrs Lynn Fearon

Comment by

CCPS27

Response ID

24/09/09 18:23

Consultation Point

Chapter 10: The Learning and Culture District. (View )

Status

Processed

Submission Type

Web

Version

0.1

This plan is looking up to 20 years ahead. Keeping this in mind...

Please make detailed comments about the plan here:

I applaud the improvements to the university -its growth physically and culturally and impact it has on the city, and integration with the city and local community . I welcome the opportunity to sit on the Parks and Reservoir Forum representing the community -I actually live in the area. This area should have extended east to include all the university accommodation up to Radnor and then Greenbank would have made up the triangle. It seems it was conveniently left out as problematic. There are huge problems with the integration of the local community which frankly is no longer a sustainable community. NO one is looking at the big picture and the needs of the indigenous resident population. It is not only students that are infiltrating area - ethnic minorities seem to be being pushed into the area in ever increasing numbers, homeless and beggars are on the increase. Mount Street School has received an excellent OFSTED report and is a great school but it is struggling with numbers because families have left. It is sad. The warden controlled homes built close to the city centre for obvious reasons are now surrounded by students. The problems are parking, refuse and noise and the main culprit the 24 hour drinking laws, despite the government stating they have had no detrimental effect. The council could help by stopping further conversion to HMOs, but not giving HMOs parking permits, by better wardening of streets where cars are double parked and on yellow lines, increasing the refuse collections and street cleaning and not allowing extensions to drinking hours in the pubs and clubs. Further CCTV cameras would help on North Hill. I recommend council officers visit NorthHill on weekend evenings between 1- 5am. Some of these issues are being given some attention but it is too slow, has been going on for years. The same problems will arise in the city centre with the mixed community envisaged.
This plan is looking up to 20 years ahead. Keeping this in mind...

Please make detailed comments about the plan here:

The plan talks of 24 hr vibrant city with mixed housing 'sustainable community'. It is an ideal and should be good but will never work with students, residents, bars and the 24 hr alcohol laws. The document alludes to the problems in Multley / Greenbank but nobody addresses the issues. High quality transport system also vital to success of city but has already failed for the Drake Circus shopping precinct. I raised it before the complex opened and was told 'We will wait and see'. We have, and now have no adequate vehicular access to the precinct. From Charles roundabout which gets quickly jammed, cars are prevented from entering by the buses migrating constantly from left to right in front of you -I have sat 10 mins watching this. The bus stops should be moved, the north entrance probably reopened with cctv camera on the junc. Ideally should have been 4th lane down North Hill for Lt turning traffic.

This plan is looking up to 20 years ahead. Keeping this in mind...

Please make detailed comments about the plan here:

Personally I like North Cross as it is -from pedestrian point of view walk down through university straight across North Cross precinct down Armada Way to centre and the HOE -it is a simply wonderful walk -no other city like it. However access to station could be better and if students have to go anywhere
good place to put them away from residents. Copthorne resembles a prison. Surely this is golden opportunity to relocate bus station. I am hugely anxious re possibility of losing Sainsburys - it would have to be relocated in city centre with adequate car park. It is used hugely by residents all around city centre, senior citizens living in warden controled homes all around centre and students. It is our only city centre supermarket and vital because people then go to other shops as well. For some reason council always seems to have 'down' on Armada Centre but it is hugely important for those who live in centre ant that is what you want to encourage. I am also anxious about 'redesigning' road system. North Cross is hugely busy and works well as roundabout because it is large. The city will fail if the road sytem is not good and has already failed along Exeter street by Drake Circus - see comments Ch 2.

Comment by  Mr Clive Narrainen
Comment ID  CCPS24
Response Date  23/09/09 09:51
Consultation Point  City Centre and University Area Action Plan - Pre Submission (View)
Status  Processed
Submission Type  Email
Version  0.2

Have you made comments about the City Centre and University Area Action Plan before?  No

This plan is looking up to 20 years ahead. Keeping this in mind...

Do you think that it is the most appropriate plan?  Yes

Do you think the ideas suggested in the plan are flexible, realistic and deliverable?  Don't know

Do you think the ideas suggested in the plan are backed up by facts and good research?  Yes

Do you think the plan fits in with other local, regional and national plans and strategies?  No
Have you made comments about the City Centre and University Area Action Plan before? No

This plan is looking up to 20 years ahead. Keeping this in mind...

Do you think that it is the most appropriate plan? No

Do you think the ideas suggested in the plan are flexible, realistic and deliverable? Yes

Do you think the ideas suggested in the plan are backed up by facts and good research? Don't know

Do you think the plan fits in with other local, regional and national plans and strategies? Don't know

Please add any further comments here:

reference: Plymouth City Central Bus Station. I appreciate what has been achieved in this city and what is planned for the future but there is one area in our city that has been so neglected and should be thought of within the future plans and that is PLYMOUTH CITY BUS STATION, where visitors arrive and depart from. WHAT A DISGRACE! Having visited other cities I feel quite ashamed. I believe at one time there was talk of a new station being planned but that is all it seemed to be “talk”. I wonder? Do any of our councillors have need to visit this station? Maybe not as most people have cars these days. Well, if cash is not available for this project then this poor delapidated - and yes- disgusting station of ours should be given a thorough clean up, the areas where the buses and coaches arrive and depart is passible but the entrances from the steps especially from the east end is shocking. What visitors must think Heaven knows! I wish you would consider what-in my mind-is more important than some of your other planning projects. OUR CITY NEEDS SOMETHING BETTER.

Comment by Mr Neal Whitehead
Comment ID CCPS22
Response Date 11/09/09 14:26
Consultation Point City Centre and University Area Action Plan - Pre Submission (View)
Status Processed
Submission Type Email
Version 0.2
Under the 2004 Planning and Compulsory Purchase Act and accompanying Regulations the South West Strategic Leaders' Board (the executive arm of South West Councils), as the Regional Planning Body (RPB), has the role in assessing the general conformity of Local Development Framework (LDF) documents with the Regional Spatial Strategy (RSS). It has also the duty to respond to strategic planning applications and pre-application proposals and to assess if they would impinge on the delivery of the RSS. It also responds to consultation received from local authorities and developers on such issues (within the parameters set out in the Act and Regulations). The current RSS is RPG10 but you will also be aware that the new RSS is being produced. The Examination in Public (EIP) of the draft RSS (dRSS) closed on 6 July 2007 and the Panel Report was published in January 2008. The evidence base behind the emerging RSS can be considered as a material consideration and will carry greater weight the closer to publication the RSS gets. The Secretary of State’s Proposed Changes to the draft RSS were published on 22 July 2008 and public consultation closed on 24 October 2008. The draft RSS is the RPB’s agreed strategic planning position; however, the Proposed Changes clearly set the planning policy framework for the region. Although the RPB may not agree with some of the modifications made in the Proposed Changes, it is important to note that the Government’s Proposed Changes now carry very significant weight as a material consideration, and must be taken into account when assessing LDDs and planning applications. Comments As you know the RPB previously commented on this AAP at the Issues and Options stage, my letter of 12 December 2008 refers. At that time we concluded that “In the RPB’s opinion it is clear that the document is in general conformity with RPG10 and the draft and emerging RSS” We note, welcome and agree with your conclusions (eg at para 3.4 of the Sustainability Assessment) that this current consultation document has largely carried forward the general themes remain very similar but now with • Greater emphasis and clarity on the key role of Plymouth City Centre in supporting service provision & economic growth within the south west. • Specific focus on the need for low carbon solutions towards energy supply. • A more balanced objective around ‘movement’ that provides greater recognition for public transport, pedestrians & cyclists. • Greater emphasis on the value of the City Centre’s historic assets. • Specific recognition of the key role the West End has to play in supporting independent retailing, enterprise and sustaining supply and demand for local goods and services. We note and welcome that these changes perform strongly against SA objectives and appraisal criteria, and are positive responses to previous SA recommendations. We consider that the document is consistent with delivering the strategic objectives of the current and emerging RSS and have no additional comments to make. I trust that you have found these comments useful and look forward to seeing the document at the next stage. Please let me know if you need any further information.

Comment by Mr Martyn Dunn
Comment ID CCPS21
Response Date 09/09/09 09:31
Consultation Point City Centre and University Area Action Plan - Pre Submission (View)
Status Processed
Submission Type Letter
Version 0.2

This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:
Further to your letter and documentation dated 18 August 2009 regarding the notice of pre-submission of the above I would advise that at this stage South West Water have no particular comments. Clearly as and when the final proposals are identified we would welcome the opportunity to comment upon its impact in terms of our being able to provide adequate water and drainage infrastructure.

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<tr>
<th>Comment by</th>
<th>Mrs Joan Johnson</th>
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<tr>
<td>Comment ID</td>
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<td>Consultation Point</td>
<td>City Centre and University Area Action Plan - Pre Submission <a href="#">View</a></td>
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Have you made comments about the City Centre and University Area Action Plan before?  
- No

Do you think your comments were listened to?  
- Not sure

This plan is looking up to 20 years ahead. Keeping this in mind...

Do you think that it is the most appropriate plan?  
- Don't know

Do you think the ideas suggested in the plan are flexible, realistic and deliverable?  
- Don't know

Do you think the ideas suggested in the plan are backed up by facts and good research?  
- Don't know

Do you think the plan fits in with other local, regional and national plans and strategies?  
- Don't know

Please add any further comments here:

I read in the PPI Newspaper that you wish to make Plymouth the top shopping destination, you should give priority to the following - 1. Provide a kiosk on the pavement space between Dingles and the Edinborough Woollen Mill shop, where visitors can ask about various shops, places, buses etc which they want to visit. I have been stopped so many times by people asking me info on these items, (even though you have put sign posts up) whilst shopping in Plymouth. 2. I have seen so many people sitting on the walls of the flower beds because there is not enough seating provided in the city centre, remember men get fed up walking around shops, they prefer to sit and wait for the wives and women prefer this and both of them like to sit and enjoy the various activity going on around them before moving on to spending their money in the shops and cafes. Take a walk yourself around the city on a busy Friday and you will see for yourself where extra seating etc should be provided. Also a skate board park should be provided for the young people as they have taken over the square by the civic centre and i was almost knocked over by one of them and hit by the board when I went to pay my Council Tax. Space by the putting green on the Hoe would be ideal as this would then make it safer for people using the centre streets and the young people would be given an area out of the way and be provided for the same as the older people who have the bowling green to enjoy.
Ms. Wendy Kent

Have you made comments about the City Centre and University Area Action Plan before? No

This plan is looking up to 20 years ahead. Keeping this in mind...

Do you think that it is the most appropriate plan? No

Do you think the ideas suggested in the plan are flexible, realistic and deliverable? No

Do you think the ideas suggested in the plan are backed up by facts and good research? No

Do you think the plan fits in with other local, regional and national plans and strategies? No

Please add any further comments here:

I agree with comments made by Mrs. Ruth Smith. The North Hill/Greenbank/Mutley area has a very high proportion of student lets, many of which are not well run or controlled. This causes horrendous problems with parking, rubbish put out at the wrong time or tipped in the back lanes, and rowdy behaviour exacerbated by the proliferation of bars and clubs on North Hill and Mutley Plain. As a long-term resident of the area, I feel aggrieved that my Council Tax subsidises this behaviour, even if it is by a minority, as students do not pay Council Tax or contribute to the upkeep of such facilities as the area has. North Hill and Mutley plain need more "practical" shops, not more drinking establishments.

Please make detailed comments about the plan here:

See above.
Version 0.2

Have you made comments about the City Centre and University Area Action Plan before? No

This plan is looking up to 20 years ahead. Keeping this in mind...

Do you think that it is the most appropriate plan? Don't know

Do you think the ideas suggested in the plan are flexible, realistic and deliverable? Don't know

Do you think the ideas suggested in the plan are backed up by facts and good research? Don't know

Do you think the plan fits in with other local, regional and national plans and strategies? Don't know

Please add any further comments here:

The area that does not seem to be included in your plans is the one that is currently derelict between the Drake Circus Shopping Centre and the University. This is one area that is high profile and needs to be brought back under the control of the Council. Why should it not be created as a "green" area with trees, seats etc. With the potential building being proposed in front of the university Babbage Building, then the amount of green space will be reduced, so using the suggested space would compensate for the potential loss.

Please make detailed comments about the plan here:

My concern is that if we have another "landmark" building in that position it will be just creating a cavernous space between the Levinsky building and this new building. At the minute pedestrians coming down North Hill have an open view across to the parkland across the Hamoaze, bring light and space into the city. If a building is built in the current vacant lot, this view will be blocked and the sense of Plymouth being near the sea obscured. As stated I think the space should be made a open public area, we have relatively few at this end of the town. I am also rather concerned about "landmark" buildings – does this mean we have something like the current Drake Circus Shopping centre? If a building is go there then it needs to reflect its position the other buildings around it and a scale that will not dominate.

Comment by Mr Paul McAuley
Comment ID CCPS17
Response Date 03/09/09 18:14
Consultation Point Chapter 9: The Northern Office District, North Cross and the Railway Station (View)
Status Processed
Submission Type Web
Version 0.1
This plan is looking up to 20 years ahead. Keeping this in mind...

Please make detailed comments about the plan here:

I find it hard to believe that the council feel the need to pull down Caprera Terrace. This would be repeating the mistakes of the past from Abercrombie. Plymouth has lost enough of its soul, to be replaced with the architects white elephants of the future, that are now being considered for removal. I would be extremely against this scheme and would prefer to see integration of old and new buildings. I also think that a chance to resite the bus station next to the train station should be taken.

Comment by Miss Rachael Bust
Comment ID CCPS16
Response Date 01/09/09 15:43
Consultation Point City Centre and University Area Action Plan - Pre Submission (View)
Status Processed
Submission Type Web
Version 0.2

This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

Having reviewed your document, I confirm that we have no specific comments to make on this document at this stage. We look forward to receiving your emerging planning policy related documents; preferably in an electronic format. For your information, we can receive documents via our generic email address planningconsultation@coal.gov.uk, on a CD/DVD, or a simple hyperlink which is emailed to our generic email address and links to the document on your website. Alternatively, please mark all paper consultation documents and correspondence for the attention of the Planning and Local Authority Liaison Department. Should you require any assistance please contact a member of Planning and Local Authority Liaison at The Coal Authority on our departmental direct line.

Comment by Mrs A Morgan
Comment ID CCPS15
Response Date 01/09/09 09:17
Consultation Point City Centre and University Area Action Plan - Pre Submission (View)
Status Processed
Submission Type Email
Have you made comments about the City Centre and University Area Action Plan before?  Yes

Do you think your comments were listened to?  No

This plan is looking up to 20 years ahead. Keeping this in mind...

Please add any further comments here:

I have been in touch previously with my comments about the future development of Plymouth. I feel that many opportunities have been lost in the past and I have lived in Plymouth for over 40 years. My suggestions are to build at least a couple of play areas for children - one play park could be beside Drake's Circus and another at the far end of town near Colin Campbell Court. Also, to bring life and invigorate the city and to include all ages, maybe an indoor bowling/leisure centre - once again Colin Campbell Court would be a good site to use. The park and bowling green centre would encourage all ages to utilise an underused area of the city. Also, a couple of shops which would also attract new visitors and locals are Lakeland Ltd. (again placed at the bottom end of town) and Carluccio's - a great favourite eaterie and store and reasonable priced. Thank you for your time.

Please make detailed comments about the plan here:

Throughout the document, there is no clarity of the Armada Way leading the City Centre pedestrian southward to the City's most historic and valuable open air asset, called "The Hoe". Throughout the year a series of events take place on "The Hoe" and at all times there is a magnificent outlook over Plymouth Sound. The South West Coastal Path runs along the seaward side of The Barbican and The Hoe and up the west side of The Centre. Secondly the pressing need for a proper road and pedestrian system to link the Centre with evolving "Millbay" and convey ferry traffic in and out of Millbay, avoiding "The Centre", is absent.

Comment by Sir Robert Gerken
Comment ID CCPS14
Response Date 28/08/09 12:37
Consultation Point Chapter 2: Context and History (View)
Status Processed
Submission Type Web
Version 0.1

This plan is looking up to 20 years ahead. Keeping this in mind...

Comment by Mr R Sroka

This plan is looking up to 20 years ahead. Keeping this in mind...
This plan is looking up to 20 years ahead. Keeping this in mind...

Please make detailed comments about the plan here:

The railway station is a key gateway to the city - but so is the bus and coach station. The plan makes no mention of this opportunity to integrate city transportation infrastructure into the design. Such integration would enable visitors or residents arriving at the city by train to continue their journeys elsewhere by public transport and help give critical mass to the area enabling shops and restaurants to thrive out of business hours. Think also about visitors or residents arriving late evening, say from London. Even with a 'high-quality' gateway to the city, deserted office buildings and concourses are not an attractive proposition, possibly inviting a mugger's paradise. You don't want a visitor's reaction to be to get out of the area as quickly as possible. I would also like to see more details about the railway station. The topology of the area might lead the architects to design a below-surface station complete with escalators and lifts, unfortunately prone to vandalism and failure. They may have New Street, Birmingham in mind as a model. Please avoid this option at all costs. On the plan itself (as illustrated in Monday's Herald), the 20-storey hotel appears to be the main feature, not the square. I think this is a mistake. Cities are for people not for hotel residents. Therefore, make the square the main feature and make it larger. Surround it by shops and possibly the gateways to the railway (and bus/coach) station. Move the hotel from its proposed location to the south side of the square to avoid the ugly juxtaposition of buildings currently proposed. Make this area a living area not just for daytime but for evenings as well. What about car-parking? Think about security and vandalism in the kind of city that Plymouth aspires to be.
This plan is looking up to 20 years ahead. Keeping this in mind...

Do you think that it is the most appropriate plan? Yes

Do you think the ideas suggested in the plan are flexible, realistic and deliverable? Don't know

Do you think the ideas suggested in the plan are backed up by facts and good research? Yes

Do you think the plan fits in with other local, regional and national plans and strategies? Yes

Please add any further comments here:

More access for disabled people please.

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Comment by: mr brett johnson
Comment ID: CCPS11
Response Date: 24/08/09 11:49
Consultation Point: Strategic Objective: 6
Status: Processed
Submission Type: Web
Version: 0.1

Have you made comments about the City Centre and University Area Action Plan before? No

This plan is looking up to 20 years ahead. Keeping this in mind...

Do you think that it is the most appropriate plan? No

Do you think the ideas suggested in the plan are flexible, realistic and deliverable? No

Do you think the ideas suggested in the plan are backed up by facts and good research? Don't know

Do you think the plan fits in with other local, regional and national plans and strategies? Don't know

Please add any further comments here:

frankly i know very well i cant do anything about these plans ,as i know the views of local residents won't be taken into account anyway , however as a disabled person who uses a mobility vehicle to get round - i want to know what provisions will be made for us to safely access the town centre whilst all this is going on WITHOUT having to go miles out of our way ? based on previous experience - little if
ANY thought is given to the disabled when these major schemes are in progress - so what are you
going to do about all the disruption and providing us with safe and convenient access ??

Please make detailed comments about the plan here:

where i live ( Winston avenue ) seems to be on the edge of this little lot - so years of disruption , noise ,
dust , increased traffic and construction vehicles - then being overshadowed by this monstrous hotel
that's proposed - ( looks worse than that awful railway station building that exists now !! ) - - and will it
all stop here ?? - oh no , next step will be clear us all out and the whole will become one large part of
the university area - after all all these posh people in the hotel wont want to be looking down on us
poor folk in our tatty houses just more ugly faceless buildings in my opinion - with no consideration for
those of us that will have to put up with all the inconvenience of all this - but really whats the point ??
no one listens and my comments will just be dismissed as irrelevant and negative !! - situation normal
in Plymouth so it seems when the locals comment - ( all i can hope is i will either be dead or someone
will come and offer me a good price for my property before it gets blighted so i can move elsewhere )
well i have said my piece - please feel free to ignore my comments .lol

Mrs Ruth Smith

This plan is looking up to 20 years ahead. Keeping this in mind...

Do you think that it is the most appropriate plan? No

Do you think the ideas suggested in the plan are flexible, realistic and deliverable? No

Do you think the ideas suggested in the plan are backed up by facts and good research? Yes

Do you think the plan fits in with other local, regional and national plans and strategies? Don't know

1. There needs to be a greater effort made to keep Greenbank/Mutley as sustainable communities. I
see very little evidence of this happening at the moment. e.g. there is an absence of young families
in these areas, Greenbank especially, due to an increase of housing inappropriate for families. This
has a 'knock-on' effect in the whole area. In our street there are only aprox. 3 - 4 families with school-age
children! Could there be greater liason with other University cities to see how they have dealt with, or
are dealing with, this type of issue. 2. As the University have a Green Travel Plan for their Campus,
can they be encouraged to do more to discourage students from using Residents Parking spaces as
cheap long-term parking, i.e. they walk to the University Campus and their cars are rarely used. This causes problems for permanent Council Tax-paying residents being unable to park their cars. This is clearly demonstrated during vacation times when parking is much easier for local residents. We can even park within sight of our properties whereas during term time we are often unable to park in our street. It has been suggested that only Council Tax-payers should be entitled to residents parking permits. This is not discrimination against students. If students have a genuine reason to bring their cars to the city whilst studying at the University, why does the University not provide a dedicated, secure parking facility for those particular students. An alternative would be to use the Parking facility at the Eaton site, Estover as used recently for the University Open Days. Alternative facilities could be provided at the Regents Street Multi-storey car park or at the secure Park and Ride site at Roborough which has considerable spare capacity at the moment. 3. What is meant by 'enhancing the cultural area of North Hill', is this an euphanism for more Bars!? 4. The Roland Levinsky building is a superb piece of architecture which enhances both the Campus and the bottom of North Hill. It is claimed that it is available to the Community but at a price. The local Primary school would love to use the facility as part of their 'relationship' with the University, but were unable to afford the fees!

Please make detailed comments about the plan here:

See above.

Comment by Cllr Peter Berrow
Comment ID CCPS9
Response Date 19/08/09 09:25
Consultation Point Policy/Proposal: CC 14 North Cross and the Railway Station (View)
Status Processed
Submission Type Web
Version 0.1

This plan is looking up to 20 years ahead. Keeping this in mind...

Please make detailed comments about the plan here:

Again if Housing is constructed in this area it should not only not be exempted from Afford housing but that the figure for this should be at most £90,000 or less.

Comment by Cllr Peter Berrow
Comment ID CCPS8
Response Date 19/08/09 09:21
Consultation Point Policy/Proposal: CC 11 Cornwall Street (View)
Status Processed
Submission Type Web
Version 0.1
This plan is looking up to 20 years ahead. Keeping this in mind...

Please make detailed comments about the plan here:

Again affordable housing in my view should not be exempted from the Development as quite clearly as present First time buyers can't not access the market place and also the Affordable housing should be below £90,000.

Cllr Peter Berrow
Comment by
Comment ID CCPS7
Response Date 19/08/09 09:17
Consultation Point Policy/Proposal: CC 8 Colin Campbell Court (View)
Status Processed
Submission Type Web
Version 0.1

This plan is looking up to 20 years ahead. Keeping this in mind...

Please make detailed comments about the plan here:

I would have thought that we should be not only keeping the 30% affordable housing but also increasing it for this area. Also the price tag for this should not anything more than about £90,000 due to the fact that most people working in this area will not be able to afford any dwellings above this figure.

Cllr Peter Berrow
Comment by
Comment ID CCPS6
Response Date 19/08/09 09:07
Consultation Point Milestones 2006 – 2021 (View)
Status Processed
Submission Type Web
Version 0.1

This plan is looking up to 20 years ahead. Keeping this in mind...
Please make detailed comments about the plan here:

In terms of the employment hopefully most jobs will be Full time rather than Part time. Also in terms of Housing again hopefully most dwellings will be below the £100,000 price tag as this is the maximum most people living in Plymouth can afford in terms of not only first time buyers but also people with zero equity in their property.

Comment by Cllr Susan McDonald
Comment ID CCPS4
Response Date 18/08/09 13:46
Consultation Point Policy/Proposal: CC 3 City Centre Public Realm (View)
Status Processed
Submission Type Email
Version 0.2

This plan is looking up to 20 years ahead. Keeping this in mind...

Please make detailed comments about the plan here:

There is very little mention of the needs of children and play space within the AAP.

Comment by Cllr Susan McDonald
Comment ID CCPS3
Response Date 18/08/09 13:44
Consultation Point Policy/Proposal: CC 8 Colin Campbell Court (View)
Status Processed
Submission Type Email
Version 0.2

This plan is looking up to 20 years ahead. Keeping this in mind...

Please make detailed comments about the plan here:

Whilst obviously not a definitive planning document, the AAP lacks clarity concerning the housing at Colin Campbell Court. There should be greater clarity concerning the mix of additional car parking, traffic, residential, commercial e.g. shops and licensed premises as to how this mix will be managed successfully since it isn't managed very well now.
This plan is looking up to 20 years ahead. Keeping this in mind...

Please make detailed comments about the plan here:

There is a distinct lack of clarity concerning social housing in line with the Mackie vision which advocated more people living within the city centre, not just those who can afford to buy their homes.

This plan is looking up to 20 years ahead. Keeping this in mind...

Please make detailed comments about the plan here:

Why are the issues and options going back for further public consultation when the students (and there appears to be quite a lot of them) are out of the city for the summer holidays? This point also includes staff of whom it could be said work within the area of coverage as the city centre and University AAP.