

Appendix O - Responses to Representations on the City Centre and University AAP that could lead to potential improvements to the Plan

The submitted AAP has not been changed from the document which was consulted on during August and September 2009, in accordance with the regulations and PPS12. The Council believes the document is soundly based, as submitted, and does not need to be altered.

However, of the representations made during the Pre-Submission consultation on the City Centre, several raised issues which the Council felt could lead to improvements to the plan. The full set of representations are included in this document in Appendix M. It should be emphasised that the Council believes that the AAP as submitted is sound, and that none of these alterations are necessary to make the plan sound. They do, however, highlight areas where clarifications or the correction of typographical errors would help to create a better final product. None of these alterations comprise alterations to policy or changes which would require fresh sustainability appraisal, were the Inspector to recommend changes to the AAP.

The City Centre Districts

What the AAP Says.

The City Centre and University Area Action Plan is divided into a number of chapters, several of which focus on particular parts of the plan area. These areas are referred to as Districts, and each one has an over-arching objective. As paragraph 3.7 states, "The AAP considers the City Centre as a series of districts, each with its own characteristics and each playing a particular role both today and in the future."

It should be noted that the AAP does not contain policies limiting the types of development which should take place in each District. The objectives set out aspirations for the role each District could support in an improved City Centre in the future, without trying to limit the kinds of uses which may locate in each area, and fully based on the existing characteristics each district already displays.

This concept has evolved from the idea of City Centre Quarters which was set out in the Issues and Preferred Options consultation document of October 2008. It was initially introduced in Chapter 7 of the Future Investment and Development Strategy produced for the Council by Cushman and Wakefield in 2008, as a way to introduce variety and distinctiveness into the City Centre to create a number of different attractions to draw people into the City Centre.

What People have said.

A number of respondents raised some reservations regarding the identification of Districts. The Plymouth Architectural Trust, the Plymouth City Council Labour Group and English Heritage South West Region expressed concern that the Districts represented a 'zoning' approach, that it was not clear how the Districts link to each other, and that the identification of Districts could lead to the loss of the unified character of the Abercrombie Plan.

The Council's Response

The Council fully believes that the AAP as submitted is sound and that the approach of identifying City Centre Districts is robust.

It should be noted that the Quarters Plan set out in the Issues and Preferred Options consultation document received a greater amount of objection, and had clearly given the impression that the Council was attempting to zone land uses in the City Centre. This was not the intention, and a direct result of the comments received at that stage has been that the AAP now places less of an emphasis on Quarters and makes positive efforts to set out that:

- A diverse range of uses will be appropriate within each District (each Strategic Objective is based around the existing character of each District and does not in any way restrict the uses which could be developed), and
- The 'Abercrombie Grid' of streets in the City Centre is the defining unifying characteristic of the City Centre and should be protected and celebrated (Strategic Objective 2 bullet point 1).

Nevertheless, the reasons for identifying Districts and the relationships between Districts and the character of the City Centre as a whole could be usefully clarified without altering in any way the essence of the AAP's approach. If the Inspector were to decide that the AAP could be altered in this way, the following changes could be made:

- In paragraph 3.7, after "...both today and in the future.", add:

"These districts already have a distinctive character and contribute to the variety of experiences in the City Centre. This AAP does not attempt to limit the types of development which can take place in the Districts, and aims to show how each District contributes to the character of the City Centre as a whole."

Location of new office developments

What the AAP says.

The AAP proposes the redevelopment of a new office district at North Cross, which will have strong links to the University and will also include a new railway station. The North Cross Office Core could provide up to 100,000 sq m of office floorspace creating approximately 4000 high quality jobs adjacent to the City Centre. It is possible that the scheme could begin within 5 years.

What People Have Said

The South West Regional Development Agency have commented that the new office developments at North Cross should complement the delivery of offices at other locations in the city such as Millbay and Derriford.

The Council's Response

The Plymouth Core Strategy clearly identifies Derriford as a key area for growth in employment over the plan period, particularly in the medical and healthcare sector, and also identifies the Waterfront area as a location for growth and the creation of a business services office sector. The Millbay and Stonehouse AAP also identifies a location for office development as part of the redevelopment of Millbay docks. The Council is therefore clearly committed to the delivery of employment space at key locations across the city. The developments at Derriford are already delivering space for Medical and Healthcare businesses, and the North Cross Office Core will create space for a new business services sector as well as playing a part in the regeneration of the City Centre. This is clearly fully in line with the Core Strategy and the Local Economic Strategy and therefore the Council believes the AAP is sound. It may, however, be helpful to clarify the relationship of the North Cross Office Core to developments in the rest of Plymouth. If the Inspector were to agree that changes were appropriate, the following clarifications could be made:

- In paragraph 9.3, after "...changes in the City Centre.", add:

"The development of an office core at North Cross will kickstart the creation of a business services sector in the City, and will complement the medical and healthcare cluster at Derriford and the office development at Millbay."

Typographical errors

What people said.

Two typographical errors have been highlighted by respondents:

- The Key Development Outputs table on page 17 of the draft AAP refers to amount of employment being provided by the AAP in terms of numbers of jobs. The figure in the table, however, refers to the amount of floorspace in sq m.

Council's Response – This is an error. The table on Page 17 should refer to '**Employment (amount of floorspace)**'

- Proposal CC08 (Colin Campbell Court), bullet point 9 refers to a 'combined heat and power network'.

Council's Response – This an error. Bullet point 9 should refer to a '**combined heat and power network**'.

These changes can be made without affecting the soundness of the AAP.

References to Culture in the City Centre

What the AAP says.

The City Centre and University AAP attempts to show that culture and cultural activity should be one of the key elements of the regeneration of the City Centre. There are many parts of the AAP where culture is referenced, including the Area Vision (page 12), various places within Chapter 5: Placemaking in the City Centre, and in Chapter 7: The West End – the Market and Independent District.

What People have said.

Several responses to the consultation have made suggestions as to how the AAP could include more effective references to culture as a key driver of regeneration:

- The Arts Council of England also believe that the expanded Strategic Objective 2 in Chapter 5 could include reference to providing a role for artist collaboration in developments and proposals, and that this would be inherent in the creation of high quality city centre built environment.
- Overall, the Arts Council for England is keen to see developers involve artists and creative thinking at masterplanning stages.
- Mr Ian Hutchinson believes that it is essential that there is a rich 'marbled effect' of cultural provision throughout the City Centre, including innovative solutions to the public realm and public art.

The Council's Response.

The Council believes that the AAP is sound as submitted. It is clearly the Council's intention to create a strategy for the City Centre which is flexible and which allows innovative designs and solutions to take place as masterplanning of specific sites is undertaken. The Council would hope that developers and masterplanners would involve artists and use cultural tools from the earliest stages of designing schemes.

The AAP attempts to point out where the clearest opportunities exist for cultural activities to take place in the City Centre, particularly in the sections on the public realm and in Chapter 7. It is not, however, the Council's intention to limit cultural input to the regeneration of the City Centre to just these areas. It may therefore improve the AAP if further references were included to guide developers when proposals come forward. If the Inspector were to agree that changes were appropriate, the following clarifications could be made:

- Add an extra bullet point to paragraph 5.2, to read:

“The creation and enhancement of a rich and varied cultural provision across the whole City Centre, so that the City cements its position as a regional cultural destination as well as a commercial destination. Developers will be encouraged to involve artists and creative thinking at the masterplanning stages of proposals.”

Points raised by the University

What the AAP says.

Chapter 10 of the AAP sets out the Council's aspirations for the University of Plymouth and the Plymouth College of Art. The AAP describes much of the work the University has done already to improve its campus, reflects some of the aspirations set out in its Masterplan and supports its future plans.

What People Said.

Mr Martin Berkien representing the University of Plymouth asked for the following points to be clarified:

- The University notes that student accommodation is specifically referred to in Policy CC15 (The Northern Triangle), but believes that it could be referred to more broadly.
- The statement in paragraph 10.6 that the University is moving towards a 'car-free campus' is incorrect and should be corrected.

The Council's response.

The Council believes that the AAP is sound without these alterations being made. The changes are, however, clarifications or expansions of details already in the AAP and would improve the plan. If the Inspector were to agree that changes were appropriate, the following clarifications could be made:

- In paragraph 5.19, after "...significant amounts of new housing, ", add **"including student accommodation,"**.
- **In paragraph 10.6, delete bullet point 3.**

Other Improvements to the AAP.

The following individual comments were received suggesting improvements to the AAP. The Council believes that the AAP is sound as submitted, but considers that the AAP could be improved by these additions and clarifications. The comments are:

- Mr Andrew Pratt believes the AAP should formally recognise the value of providing health services in the City Centre. Examples could include breast screening, sexual health, psychological therapies and walk-in GP services.

Council Response: The Council believes the AAP is sound as it stands. If the Inspector were to agree that changes were appropriate, the following clarifications could be made to the AAP:

Add a new bullet point to paragraph 5.18 to read “Providing healthcare facilities in the City Centre where possible, ranging from drop-in services to GP surgeries.”

- English Heritage South West Region believe that there is not enough reference to high quality design in Chapter 8 The Core Retail District.

Council Response: The Council believes the AAP is sound as it stands. There are many references throughout the AAP to the high quality of design that will be expected of proposals in the City Centre. In addition, it is also clear in the Delivery Chapter that a number of other studies will be prepared to inform the quality of new developments, and that guidance such as the Design SPD will also be used. However, the AAP could be improved by emphasising the expectation of high design standards. If the Inspector were to agree that changes were appropriate, the following clarifications could be made:

Add a new bullet point to paragraph 8.7 to read: “Opportunity to create buildings designed to the highest standards, creating a striking built form which is well integrated into the Abercrombie beaux arts grid of streets.”

- Mr Sean McVeigh of Prudential Property Investment Mngrs Ltd believes that the importance of New George Street in the City Centre retail circuit could be emphasised as part of the text explaining Policy CC12.

Council Response: The Council believes the AAP is sound as it stands. New George Street is recognised in Chapter 2 Figure 1 as a key part of the City Centre retail circuit. Indeed it is for this reason that Policy CC12 is included in Chapter 8 The Core Retail District. Nevertheless, the AAP

could be clarified by commenting on this importance as part of the explanation of Policy CC12. If the Inspector were to agree that changes were appropriate, the following clarifications could be made:

Add the following text to the start of paragraph 8.12: “As set out in Chapter 2, New George Street (East) is part of the primary retail circuit in the City Centre.”

- Mr Peter Whitehead, representing several residents associations for Planning Aid, asks that any routes between Stonehouse North, North Cross and the University should be well lit and accessible to all users.

Council Response: The Council believes the AAP is sound as it stands. Reference to the quality of the links between the University and the University could improve the AAP. If the Inspector were to agree that changes were appropriate, the following clarifications could be made:

Add the following text to the final bullet point of paragraph 9.10: “, and create strong, well lit and accessible links between Stonehouse and the University.”

- The Government Office for the South West comment that it is difficult to make sense of the various figures for job creation contained in the AAP.

Council Response: The Council believes the AAP is sound as it stands. Nevertheless, there are typographical errors with some of the jobs figures in the AAP which could lead to confusion. These do not affect the soundness of the AAP, but could be corrected. If the Inspector were to agree that changes were appropriate, the following clarifications could be made:

Paragraph 12.10: the fourth bullet point of the paragraph should read “Creating approximately 42,000 new jobs in the city’s travel to work area by 2021”

- English Heritage South West Region comment that the Evidence Base should contain English Heritage and CABE Guidance on Tall Buildings (2007); Building for Life (2008); Making Design Policy Work, CABE, (June 2005); Manual for Streets, DoT, (2007).

Council Response: The Council believes the AAP is sound as it stands. These documents were indirectly used in the creation of the City Centre and University AAP, so it would be inappropriate to include them in the Evidence Base per se. However, they are documents that the Council would expect to be referred to as more detailed masterplanning and design work is undertaken by the Council and developers. They could

therefore be referred to in the Delivery Chapter to provide extra guidance to users of the AAP. If the Inspector were to agree that changes were appropriate, the following clarifications could be made:

Change the first sentence of paragraph 12.8 to read: “In addition, there are a number of Supplementary Planning Documents, other guidance and best practice which will be relevant to City Centre developments and which developers should refer to. These are:”

Add the following documents to the list in paragraph 12.8:

- **English Heritage and CABI Guidance on Tall Buildings (2007);**
- **Building for Life (2008);**
- **Making Design Policy Work, CABI, (June 2005);**
- **Manual for Streets, DoT, (2007).**