# STATEMENT 1

Central Park AAP Public Examination

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<td>Whether Policy/Proposal CP1 proposes a level of development that would be inconsistent with the Park’s primary function, and inconsistent with Government guidance on the protection of green spaces? Is it deliverable within the timescale set down in the AAP?</td>
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| Examination Session: | 04 June 2008 |
Issue to be Examined

1. The Inspector has identified the following issues to be examined:

   “Whether Policy/Proposal CP1 proposes a level of development that would be inconsistent with the Park’s primary function, and inconsistent with Government guidance on the protection of green spaces?”

   And "Is it deliverable within the timescale set down in the AAP?"

2. The Council considers that the submitted Central Park Area Action Plan is sound. It does not believe that any of the comments made in the representations regarding Proposal CP1, The Life Centre and summarised in the grey boxes below, bring into question the soundness of the AAP. The Council believes that Proposal CP1, The Life Centre proposes a level of development that would be consistent with the Park’s primary function and is consistent with government guidance on the protection of green spaces.

3. The Council is of the opinion that Proposal CP1, The Life Centre, is deliverable within the timescale set out in the AAP.

Context

4. Area Vision 7 of the adopted Plymouth Core Strategy sets out that Central Park should become “an outstanding venue of regional and national significance for active recreation, health, art, education, culture and the environment”. In particular, the Area Vision sets out the objective “To create a landmark regional Life Centre complex of high quality design and innovative technology”.

5. Proposal CP1 of the submitted Central Park AAP sets out the principles of the Life Centre and should be considered within the context of the Core Strategy Area Vision. It sets out that the Life Centre should be a state-of-the-art regional leisure facility which includes facilities for indoor sports, a swimming pool, ice rink and a range of health facilities. It is therefore a regionally significant centre for top class sporting, recreational and leisure activities which is a key element of the City’s growth agenda to become one of Europe’s finest and most vibrant waterfront cities.

6. The Life Centre is also a key component of the vision for Central Park. Area Vision 7 sets out that the Life Centre should be seen as one of a number of priorities for improving all aspects of the park, ranging from improvements to its formal sport and recreation opportunities, improvements to the facilities and open spaces available to users, and
improving linkages to the surrounding neighbourhoods. The Life Centre is located at the centre of the built core of the park, in a location which is already developed albeit comprising poorly designed buildings and spaces which are not fit for purpose. The Life Centre will be a new focus for Central Park and for many people will be a major gateway to a whole range of activities both at the Life Centre and in the larger Park itself.

Detailed Points

**The Park's Primary Function: CP1 Life Centre**

7. The Council maintains that Proposal CP1 Life Centre proposes a level of development that is consistent with the Park’s primary function.

The ‘Primary function’ of the Park

8. Central Park is a very large area located centrally within the City, and already is host to a very wide range of uses and activities. Given this, and the historical reasons for founding the Park, it is not an easy task to identify a clear ‘Primary Function’ of the Park.

9. The original ideas behind Central Park clearly envisaged a wide range of functions. As set out in paragraphs 2.4 – 2.6 of the submitted Central Park AAP, the masterplan for the Park prepared by Thomas Mawson in 1928 proposed a series of comprehensive developments for sports, leisure and recreation throughout the park. It proposed within the centre of the Park at the convergence of the new main avenues a “Social Centre” (meeting place) around which the principle wet, dry and leisure facilities would be built. These were close to Plymouth Argyle’s Home Park. The Masterplan also proposed a 50 metre swimming pool, facilities for tennis and bowls, a grand pavilion and terrace, a 700-800 space car park, an aviary, athletics track, glasshouse and nursery gardens. Although a number of these aspects of the park were never completed, it is clear that the original Masterplan set out a range of functions which in terms of both uses and scale are similar to those now proposed through the Central Park AAP.

10. Central Park today has a number of roles and functions, some of which survive from the 1928 Masterplan:

- It is a facility for both formal and informal recreation for large numbers of Plymouth residents due its location and accessibility in the centre of the City,

- It is a key facility for improving the health of people in the City, as set out in the Evidence Base document “Our City's Health” (2005),
11. It is therefore not accurate to say that Central Park has a simple Primary Function against which the Life Centre can be compared. It has a number of uses and functions which is only to be expected in an area of its size, complexity and history. The fact that the Council has considered it necessary to produce an Area Action Plan to guide its future development illustrates the complexity of the issues facing the Park.

12. The Primary Functions of the Park can therefore be best understood by the key themes underpinning the Area Vision. If these were to be summarised, they could be understood as:

A regionally and nationally significant venue for active recreation, health, art, education, culture and the environment including built facilities, high quality open space, wildlife areas and landscape, well connected to its surrounding neighbourhoods, and accessible and attractive to everyone living in the City.

Level of Development Proposed for the Life Centre

13. The Proposal for the Life Centre (CP1) clearly sits comfortably with both this definition of Central Park’s functions and with the original Masterplanning of the Park. As set out in paragraph 4 the Life Centre is a facility for formal indoor sport and recreation, clearly respecting the spirit of producing formal sport facilities within Central Park. It is located at the Built Core of the Park (analogous to the ‘Social Centre’ of the Park set out by Mawson in 1928), where there are already a number of built recreation facilities such as Home Park Stadium, Central Park Pools, the Mayflower Centre, the Park and Ride and the Events Field (several of which are to be replaced and vastly improved by the Life Centre).

14. Regarding the scale of the proposal, as is noted above, the land set aside for the proposal is already occupied by a number of existing built uses. It should also be noted however, that:

- The area of land set aside for the Life Centre is the maximum extent of the site required to provide the facility and its cartilage. It is intended to make the best use of the available space and to limit the footprint of the Life Centre, as set out in paragraph 4.12 of the submitted Central Park AAP. Although it is not the role of the AAP to set out detailed site plans and arrangements, it is clear that the built form of the Life Centre should take up much less than the total amount of land allocated for it.
The Life Centre, as discussed, is only one component of the Vision for the whole of Central Park. The Park itself has an area of 94ha (para 2.1 of the AAP), and the land set aside for the Life Centre only takes up about 3% of the total area of the Park.

It should also be noted that the development of the Life Centre will allow some of the existing built facilities in the ‘built core’ of the Park to be returned to open parkland. In particular, paragraph 4.10 sets out the the existing Central Park Pools will be returned to parkland.

15. The scale of the AAP Proposal is therefore minimal, and it is likely that once detailed scheme plans are drawn up the built form of the Life Centre will take up only a proportion of the land set aside for the facility. It is not the role of the AAP to set out these detailed plans. The concept of the Life Centre, however, is an essential component of the Vision for Central Park as set out in the Core Strategy, and the AAP sets out the clear principles that need to be used to deliver the proposals.

Key points made by attendees

16. That the original plan intended that the park should provide opportunities for passive leisure and active recreation, with a focus on outdoor activities.

– Certainly Central Park exhibits many opportunities for outdoor activities and sport and this AAP seeks to enhance these and provide more in terms of both quantity and quality. However given our changeable climate the recreational, sporting and health needs of the City can be addressed far more effectively if it provides some indoor and covered facilities rather than relying solely on the 1920s and 1930s preoccupation with outdoor swimming pools, and the like.

Consistency with Government Guidance on the Protection of Green space: CP1 Life Centre

17. The Council believes that Proposal CP1, The Life Centre proposes a level of development that is consistent with government guidance on the protection of green spaces:

- The aims of the AAP are fully supported by the objectives of PPG17
- The Life Centre proposals are consistent with guidance in PPG17
- The Life Centre proposals have been drawn up alongside Plymouth City Council’s Greenspace Assessment
Consistency with PPG17


19. It is again important to consider the Vision for Central Park as a whole against the objectives of PPG17, rather then simply isolate the Life Centre as a stand alone Proposal. The Life Centre is part and parcel of the package of Proposals aiming to transform Central Park, and it should be considered as such when being assessed against national guidance.

20. PPG 17 sets out a number of Planning Objectives which are all relevant to the broader aims of the AAP. The following objectives are most relevant to the Life Centre proposals:

- **promotion of social inclusion and community cohesion** - well planned and maintained open spaces and good quality sports and recreational facilities can play a major part in improving people's sense of well being in the place they live. As a focal point for community activities, they can bring together members of deprived communities and provide opportunities for people for social interaction.

- **promoting more sustainable development** - by ensuring that open space, sports and recreational facilities (particularly in urban areas) are easily accessible by walking and cycling and that more heavily used or intensive sports and recreational facilities are planned for locations well served by public transport.

21. PPG17 is also about delivering quality facilities to meet the needs of communities for open space, sport and recreation. Paragraph 18 of PPG17 actively encourages local authorities to improve the value of existing recreational land by better management and by capital investment securing “improvements to public open space to provide better compatibility of uses, promoting better accessibility, and better use of land through good design to reduce crime”.

22. Paragraph 21 of PPG17 also sets out that local authorities should consider “mixed use sport, recreation and leisure facilities to make intensive use of land to attract large numbers of visits”, and promotes developments which are “mixed use with significant elements of entertainment, retail or leisure uses that will function for many hours of the day”.

23. The Life Centre proposal clearly satisfies these aims of PPG17:

- It aims to be a facility for local communities, improving health and acting as a focal point for community activities (paragraph 4.5 points 1 and 2)
It is located within walking and cycling distance of a number of neighbourhoods, the City railway station and the City Centre, and is on main public transport routes.

- It will replace outdated and poorly sited buildings and create a regionally significant exemplarary sporting and recreation facility,
- It will make the best use of land to create an integrated mixed leisure use facility including indoor sport, wet and dry facilities, an environment centre and health facilities.

**Greenspace Quality and the Greenspace Assessment**

24. The Life Centre is the centrepiece of the sport and recreation facilities in Central Park and will act as a focus for the many attractions the Park offers. It does this using minimal land take and attempting to make best use of the land allocated, as set out in paragraph 13 above. In addition, it is worth noting that the draft Plymouth Green Space Strategy identifies Central Park as a park of ‘city’ importance in terms of its size and the range of facilities and attractions that it offers. It is identified as one of a number of parks that, with suitable investment, could be a candidate for the Green Flag Award which would raise its profile nationally, and the Life Centre proposal helps to facilitate this through the range of facilities it will bring to the Park.

25. PPG17 also requires local authorities to produce a range of Studies to assess greenspace, sport and recreation facilities. These include the City of Plymouth Greenspace Assessment (2004) and the Plymouth Playing Pitch Strategy (2007). The proposals for the Life Centre have been prepared in line with the findings of these studies and will not result in a significant loss of greenspace. It should be noted that across the City, the Council is proposing to increase the overall amount of greenspace through the allocation of new areas.

**Key points made by attendees**

26. Planning Policy Guidelines (PPG 17) are against building on greenfields and open spaces.

- PPG17 clearly contains guidance which aims to limit the amount of development which takes place on existing open space, sports and recreation facilities. The guidance, however, needs to be considered in its entirety in order to understand how it should be applied to proposals such as the Life Centre. All of the points made in this statement are relevant to this consideration, but the following points are particularly pertinent:
  - PPG17 clearly states that areas of open space, sports and recreation facilities should not be developed in a way which would lead to the loss of those facilities. The Life Centre proposal will
clearly create new open space, sport and recreation facilities and to enhance and improve the open space, sport and recreation facilities in Central Park as a whole.

- PPG17 allows for the loss of open space, sports and recreation facilities if shown to be surplus to requirements in a greenspace assessment. The Life Centre Proposals have been developed within the context set by the Plymouth Greenscape Assessment (2004) and are consistent with its findings. The question of being surplus to requirements is in this case misleading since the Life Centre will provide improved and enhanced open space, sports and recreation facilities both at the Life Centre and in Central Park as a whole.

- PPG17 allows a strategic view to be taken of open space provision across a local authority area (paras 12 and 13 of PPG17 apply). As noted above, the City Council is proposing to create new areas of open space across the City, increasing the amount of greenspace available and improving quality.

- Finally, as discussed above PPG17 supports the provision of new or improved sport and recreation facilities. The Life Centre proposals will create a facility of regional significance which will underpin the improvements being made to Central Park and cement its place as the premier area of open space and sport and recreation activity in the City. It is simply not the case that the development of the Life Centre will harm the availability and quality of open space, sports and recreation facilities in Plymouth.

27. The Central Park AAP cites the Regional Spatial Strategy in support of a regional centre of sporting excellence, but this strategy is still in the consultation and production phase.

- The Examination in Public of the Draft Regional Spatial Strategy for the South West was held during April to July 2007. The Panel Report was issued in December 2007 and the Secretary of State’s proposed changes will be published in June/July 2008. The final RSS is expected to be published in Autumn 2008.

The LDF must be in conformity with the Regional Strategy. In this case, the AAP makes the point that it is in conformity with and supported by the draft RSS, as is the adopted Core Strategy.

28. The Plymouth Corporation Act of 1923 is cited as restricting development of lands on Central Park.

- This is not so as the act is now superseded by the Town & Country Planning Acts and their subsequent revision to the present day.

29. Actual loss of green space reported as 18.6% of the park for total loss over time from first 1928 Plan.
Without detailed information to substantiate this figure it is impossible to comment. It is important to note that the Central Park AAP sets out to protect the functions of the Park as set out above, to improve the relationship of the Park to surrounding neighbourhoods both physically and functionally and to enhance these functions and relationships through limited development.

30. It is also suggested that the AAP is in conflict with Council of Europe recommendation nr R (86) 11 of the Committee of Ministers to Member States which is cited as giving a commitment (paragraph 2.1) to ensure that open space is adequately secured and protected.

- The Planning and Compulsory Purchase Act and planning policy guidance such as PPG17 are prepared by the UK Government with regard to European legislation and guidance. The AAP is fully in line with UK legislation and guidance and therefore is not in conflict with any European legislation. As set out above, the Plymouth LDF, of which the AAP is a part, makes provision for adequate greenspace and open space across the City.

Deliverability with the timescale: CP1 Life Centre

31. The Council believes that Proposal CP1, The Life Centre is deliverable within the timescale set down in the AAP.

32. The current Plymouth City Council Life Centre, Scheme Draft Project Programme demonstrates that the project is on course to be delivered by the target date of before 2012 as set in this AAP (see page 20 of the AAP). This Draft Programme (see Appendix 1) is still correct at this time and shows the main Life Centre completed before the opening of the 2012 Olympics in London, item 66 on the programme indicates the new building open and operational by week of 16th September 2011.

Completion of the Life Centre at this time will capture the enthusiasm for sports and recreation that the Olympics will bring via the press and media particularly for this country as hosts and relevance for the people of Plymouth given the involvement in the Games of our Diving Team.

Key points made by attendees

33. The main assertion being made is that the Life Centre Scheme is not financially deliverable and maintainable at costs that the people of Plymouth can afford and that this indicates that the Life Centre is for wealthy, elitist users.

- The Council maintains that Proposal CP1, The Life Centre is financially deliverable within the timescale set down in this AAP. Appendix 2 is a
Cabinet Report considered by Plymouth City Council Cabinet on 18th December 2007 setting out the details of the delivery of the Life Centre. This report sets out the Council’s commitment to the Authority’s Corporate Plan Objectives 2, 3 and 4, ensuring that the Life Centre will:

- provide excellent, efficient services, delivering value for money,
- put customers first, new facilities and programme will meet customer needs,
- ensure access for all to the Life Centre through its prices fees and programmes.

34. The Life Centre is a major capital project for the City and there is a risk that the costs may fluctuate. Hence an allowance of + 10% has been built into the estimates. The potential costs of the project is estimated at £44.00m.

The revised latest estimate of the capital cost of the scheme and the funding are set out in the Cabinet Report at Appendix 2 and can be summarised as:

**Capital Receipts £24.5 Million**  
**Unsupported Borrowing £15 Million**  
**Grants and Contributions £4 Million**  
**Planning Obligations (S106) £0.5 Million**  
**Total £44 Million**

35. Therefore the Proposal CP1, The Life Centre is financially deliverable within the timescale set down in this AAP will be maintainable at costs that the people of Plymouth can afford and is targeted at its customers needs, i.e. the people of Plymouth, and will be flexible enough to meet the needs of full competition sports required by the Region.
Appendix 1: Plymouth City Council Life Centre Scheme – Draft Project Programme
Appendix 2: Report to Cabinet 18th December 2007 – The Life Centre, Central Park