## STATEMENT 2

Central Park AAP Public Examination

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Issue to be Examined
1. The Inspector has identified the following issue to be examined: “Whether Proposals CP2, CP5 and CP6 are the most appropriate in all the circumstances.”

Summary of Key Points
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 or statements regarding Proposals CP2, Home Park, CP5 Peverell Park Road Outland Road Corner and CP6, Pennycomequick, bring into question the soundness of the AAP. The Council believes that these Proposals are appropriate in all the circumstances.

3. This statement relates to test of soundness 7 identified in Planning Policy Statement 12: Strategies, policies and allocations represent the most appropriate in all the circumstances, having considered the relevant alternatives, and they are founded on a robust and credible evidence base.

4. This statement demonstrates how proposals CP2, CP5 and CP6 are the most appropriate in all the circumstances. The submission AAP is based on a comprehensive and robust evidence base, has been subject to extensive consultation and has been subject to Sustainability, Equalities and Habitats Regulations assessments. The following paragraphs will demonstrate for each proposal, how it is appropriate in relation to:

- National policy
- Regional policy
- Local policy
- The evidence base
- The consideration of alternatives
- Consultation responses
- Sustainability appraisal
- Deliverability
5. CP2 seeks to deliver major improvements to Home Park stadium and support the extension of PAFCs programmes of training and fitness within the community, engagement with the city’s youth, through developing its southern stand for supporters, corporate clients and hospitality. It will also include complimentary commercial development including a leisure or sporting facility, conference and exhibition space, hotel, leisure and sports retailing, refreshment retailing.

6. In relation to national policy, Proposal CP2 Home Park demonstrates compatibility with National Planning Policy PPG17, (paragraph 21) “Mixed-use Sport, Recreation and Leisure Facilities.” CP2 Home Park offering a mix of enabling uses consistent with the text of PPG17 as set out below:

“Many sporting and recreational facilities will be similar in their land use characteristics to some forms of leisure - by making intensive use of land and attracting a large number of visits. Indeed, some will be mixed with significant elements of entertainment, retail or leisure uses and will function for many hours of the day. Planning permission for such developments should only be granted where they are to be located in highly accessible locations in or adjacent to town centres, or in district or neighbourhood centres. Planning permission should not be granted for a location outside such a town centre if the resulting development would undermine the centre. Sites in central locations should be allocated where there is a high level of demand for such mixed-use facilities.”

7. CP2 is consistent with regional policy. The Regional Spatial Strategy supports the creation of a regional centre for sporting excellence and identifies the need to develop high quality recreational and sporting facilities to meet the needs of the City’s population throughout the plan period.

8. The creation of a regional centre for recreation and sporting excellence as outlined by Proposal CP2, Home Park is consistent with local policies for Community Health, Safety & Well Being as set out in Plymouth’s adopted Core Strategy Strategic Objective 15 Delivering Community Well-being, which states:

“To set a spatial planning framework for the improvement of the city’s community health, safety and well-being for everyone”:

“This will be achieved through:

- Protecting and improving the City’s sport and leisure facilities through supporting the implementation of the city’s Sports Plan 2020, the Sports Facilities Strategy and the Playing Pitch Strategy so as to promote healthy and active lifestyles.
• Development of the Life Centre at Central Park.
• Safeguarding and improving the diverse leisure and recreation needs of the whole community.
• Protecting and enhancing the city’s parks and open spaces as amenity and recreation spaces by supporting the implementation of the city’s Parks and Greenspace Strategy.

9. CP2 is wholly consistent with the adopted Core Strategy Area Vision 7 statement for Central Park, which states that it will “create an outstanding venue of regional and national significance for active recreation, health, art, education, culture, and the environment, which will provide state of the art facilities for the people of Plymouth and the Sub-Region of Devon and Cornwall.”

10. CP2 is also consistent with the adopted Core Strategy Policy CS02 (Design) which states that new development should “promote the image of the City, through enhancement of international, City, and local gateway locations and key approach corridors.” Home Park is such an important site and in composition with the Life Centre is located on a key City approach corridor. In recognition of this the Proposal CP2 has been written to encourage the very best outcome in terms of design and innovation whilst maintaining the deliverability of the southern stand and its related uses.

11. CP2 sets out uses that are compatible with the Core strategy retail policy such that they will not be allowed to undermine the retail status of the City Centre by the scale and nature of the proposals. CP2 limits uses for sports and leisure retailing, the text of the Proposal states that retailing will be “of an appropriate scale and nature consistent with the Core Strategy’s retail objectives”.

The uses proposed for Plymouth Argyle’s Home Park are compatible with and complementary to the sporting, recreational and leisure activities found currently at and proposed for Home Park, and on Central Park itself, and those proposed for the Life Centre. These uses are only what you would normally expect of redevelopment schemes up and down the country in association with Championship Football Stadiums and they will serve to support the public use and enjoyment of both the new indoor recreational, sporting and leisure facilities and the outdoor environment of Central Park.

12. Plymouth Argyle Football Club have been working hard to both excel within the Football Association Championships and to complete their stadium complex for the twenty first century in line with Lord Justice Taylor’s Report into Crowd Control and Safety at Sports Events.
13. Following three years of consecutively improved performance on the field the completion of Argyle’s southern stand remains an important challenge for the Club and for the improvement of Central Park. Plymouth Argyle Football Club acknowledges this. In the past both the Club and the City Council have individually put forward plans for the improvement of built facilities at Central Park, but none of the schemes have proved deliverable at the time. The evolution of this AAP has put forward and tested the alternatives, and it has ensured that both the City and Plymouth Argyle have worked together to develop viable and complementary proposals in the form of CP1 the Life Centre and CP2 Home Park. These collectively provide a regional centre of recreation and sporting excellence with appropriate enabling uses, which are deliverable in the plan period.

14. Up until the Submission version of the AAP, the Life Centre and Home Park had been considered as one integrated proposal. Nevertheless, in relation to the Home Park proposal there are few alternatives available since the football stadium is already established in that location and the need for improvement is clearly demonstrated. Other ways of ensuring the deliverability of the proposal were considered and these included the development of housing as an integrated part of the development as well as additional housing development fronting Outland Road. These were rejected in favour of the current proposals, as they would not have met the Council’s objective of minimising the development footprint, and were not popular with the public.

15. Consultation responses on the AAP were submitted at both Issues and Options and Preferred Options stages. The bulk of the comments related to the inclusion of commercial elements in the proposal and the inclusion of residential development. Other comments related to the loss of parkland and the impact on traffic generation. However there was also a good deal of support for the concept of a regional integrated sporting facility from individuals and local groups. As a result of these comments substantial improvements have been made to the travel arrangements, and much of the residential development has been removed.

16. The SEA concludes that improvements have been made to the proposal such that it performs better than the preferred options version. It recognises the positive impact the proposal will have on leisure, distinctiveness, cultural heritage and the local economy. The submitted proposal also now includes provision for a comprehensive plan to tackle the travel impacts, in response to an SEA recommendation. The Assessment of health impacts identified the positive contribution that the facilities would make to implement the City’s health strategy. The equality impact assessment did not identify any adverse impacts on equalities groups. The HRA concluded that there would be no significant adverse impact on the integrity of the Natura 2000 sites.
17. Plymouth Argyle Football Club and private developers will undertake delivery of this proposal. The commercial elements of the proposal ensure that the scheme is viable and deliverable and able to contribute to the community benefits identified in the AAP. Implementation will be dependent on good joint working with Plymouth City Council as regards its Life Centre development proposal CP1, and the need to ensure that the transport infrastructure can be provided in tandem with the development. It is expected that the development will take place 2009-2012.

18. In conclusion, the Proposal CP2 has a good deal of support amongst the community, although there are concerns about the scale of the commercial element. The proposal however is based on an identified need supported by robust evidence, will have substantial benefits for the community and can meet the requirements of the various assessments undertaken. It is considered strongly therefore that the Proposal contained in the submitted AAP is the most appropriate in all the circumstances.

Key points made by attendees

19. The uses identified for CP2 Home Park should include Student accommodation.

The wording of CP2 does not specifically rule out student accommodation. Any applications would need to be tested against Proposal CP2’s complimentarity test and the overall Central Park Vision. Furthermore the Council questions whether student accommodation here would be too remote from the University and other educational establishments. The overall proposal for Home Park must primarily be about delivering improvements to sporting and active leisure facilities. Commercial uses must be complimentary and required to achieve the primary objective.

20. The ‘Development Zone’ as identified on the proposals map should accord with the boundary of Home Park’s ownership, however the Policy/Proposal CP2 is different and smaller (see Appendix 1).

21. The Council considers the extent of the development zone for CP2 to be appropriate for the Park and the development potential of Home Park. The Boundary drawn for CP2 follows the natural divide between the built form, hard standings around Home Park and the designed and accepted natural landscape of the Park. Any further proposals beyond this development zone would be unacceptable incursions into the park by virtue of visual interruption, restrictions to movement, and effect upon personal security of those both in the park and using Home Park.

22. There should not be Ten Pin Bowling as this would cause unacceptable traffic generation and additional pressure for car parking.
The Council considers that ten pin bowling is acceptable in principle in the mix of uses that can occur at Home Park given it is a commercial leisure provision and one that would sit comfortably with the other uses and be complementary to the mix of uses in CP2 and CP1. Traffic impacts will be determined by a Traffic Impact Assessment through the planning application process and this will restrict car parking and traffic generation to the minimum as an integrated package considering CP1 and the objective of prioritising the use of public transport and promoting sustainable transport modes.

Proposals CP5 Peverell Park Road Outland Road Corner & CP6, Pennycomequick

23. The Council considers that Proposal CP5 Peverell Park Road Outland Road Corner and CP6 Pennycomequick are appropriate in all the circumstances having considered the alternatives and the evidence base.

24. At Proposal CP5 Peverell Park Road Outland Road Corner, the local centre is an important grouping of local services. It contains a small supermarket, chemist, post office in the former Co-Op Jubilee Building, other shops and businesses on Outland Road, and a Church and library on Peverell Park Road.

25. The former Co-Op Jubilee Building is located on the prominent northern corner of the Park and on an important approach corridor to the City. The site and layout of the of the former Co-Op Jubilee Building does cause a number of problems to the appearance, functioning and environmental quality of this part of the Park as identified in the AAP.

26. At Proposal CP6 Pennycomequick, the existing terraces of Holdsworth Street and Wake Street either present their side gable ends to the Park or turn their back on it. This relationship is not an attractive or safe one, and does not encourage the most positive use of the Park at this location. The relationship particularly mars the important elevated view south from the Park towards the City. This poor relationship is also heightened by the condition of the privately owned track known as Jefferson Walk, which runs along the top of the terraces and the park. This track is in such a poor condition it hampers good and reasonable access.

27. All these issues for both Proposals were identified early on in the Local Development Framework process as regeneration issues for the adopted Core Strategy Area Vision 7, Objective 3, “to create a safe and well-connected park with its surrounding neighbourhoods”, and Objective 5, “to improve and strengthen the relationship between the park and the surrounding City in a sustainable manner”.
28. The conceptual solution to Proposal CP5 Peverell Park Road/ Outland Road Corner is set out in the plan for illustrative purposes and gives a 3D vision for how the new development might appear. The proposal promotes a replacement building set back from the main corner behind the current Jubilee building with an element of parkland brought forward on full view to those approaching the City on Outland Road. This will create a landmark composition befitting the status of Central Park in relation to the listed Pounds House beyond. The proposal provides the long standing need for car parking located to the front of the proposal and replacement retail accommodation on the ground floor allowing existing business in the Jubilee Building to easily transfer to the new development when the new is built and has residential development above it to form a mixed-use building of up to 4 storeys. This will strengthen the relationship of the local centre to the park by providing new accesses and direct overlooking from the new building onto what is currently a backland space with public toilets and children’s playground hidden behind the Jubilee Building.

29. The conceptual solution to Proposal CP6 Pennycomequick is set out in the plan for illustrative purposes and gives a vision for how the new development might appear. The proposal promotes a terrace of 2 storey family homes running along the north of the existing terraces running east and then returning south overlooking the Park served by a new access road running along its outer edge. Pedestrian access would be improved by ensuring the existing pavements along Holdsworth Street and Wake Street connect with Central Park and the overall composition would resolve the long-standing problems of the privately owned and ill-maintained Jefferson Walk.

30. Both of these proposals have been developed to be consistent with national planning policy. PPS1 promotes high quality development with a mix of uses and recommends planning authorities have regard to good practice set out in: By Design Urban: design in the planning System - towards better practice. This promotes ground floor active uses, improving the relationship of development to public spaces providing looking as a means to create & promote natural surveillance to achieve safer places. This is exactly what both Proposal CP5 and CP6 achieve by their conceptual solutions.

31. PPS1 also recommends planning authorities have regard to good practice set out in: Safer Places – the Planning System and Crime Prevention, this sets out the attributes of sustainable communities that are particularly relevant to crime prevention such as…. good access & movement with well defined routes, places that are structured to avoid conflict, places that are publicly accessible and overlooked, places that promote a sense of ownership, respect, territorial responsibility and community and places that are designed with management and maintenance in mind, to
discourage crime in the present and the future. This again is exactly what both Proposal CP5 and CP6 achieve by their conceptual solutions.

32. Proposal CP5 Peverell Park Road/Outland Road Corner entirely consistent with the LDF adopted Core Strategy Policy CS02 (Design), which states that new development should “promote the image of the City, through enhancement of international, City, and local gateway locations and key approach corridors.” Peverell Park Road/Outland Road Corner is such an important landmark site on a key City approach corridor. In recognition of this the Policy/Proposal CP5 has been written to encourage the very best outcome in terms of design for this site.

33. Proposal CP6 Pennycomequick is entirely consistent with the LDF adopted Core Strategy Policy CS02 (Design), which states that new development should “promote the image of the City, through enhancement of international, City, and local gateway locations and key approach corridors.” Pennycomequick Proposal provides such an important development that affects an important image of the City. In recognition of this the Proposal CP6 has been written to encourage the very best outcome in terms of design for this site.

34. A range of alternatives have been considered for both these proposals. In relation to Peverell Park Road/Outland Road Corner a number of alternatives were presented as part of and during the preferred options consultation. These explored alternative locations for the replacement buildings, different car parking solutions, retention of buildings and removal of the buildings without replacing them. All have been rejected because they did not address the objectives as set out in the Plan. For Pennycomequick the alternatives included variations on the nature of development such as multi storey car parking, further leisure facilities, allotments and mixed use development. Again none of the alternatives met the objectives of the Plan.

35. Objections to the Peverell Park Road/Outland Road Corner proposal related to the loss of allotments and the provision of car parking. Alternative allotment provision is being made within the Park. The Pennycomequick proposals generated significant objections to the building of residential development. As a result the scale of the proposal has been significantly reduced in the submission version of the AAP.

36. In the SEA both proposals score highly, being improvements on the Preferred Options versions. No negative issues were raised in the Equalities Impact Assessment and the HRA identified no significant adverse impacts.

37. Both the proposals have been developed to ensure that the schemes are deliverable. There are commercial elements to both which will enable the
necessary improvements to be made at these two key locations in accordance with the objectives of the AAP.

Key points made by attendees Peverell Park Road/ Outland Road Corner

38. The scale of the proposal is out of character with the location.
   The Council considers that the scale of the new building at up to 4 storeys as illustrated on the conceptual illustrations is appropriate to the scale of the space that will be defined by the new building in the context of the importance of the city approach, the surrounding buildings and the status of the park.

39. The development would set a precedent to building elsewhere in the park.
   The Council considers that the development is meeting the defined spatial planning objectives identified in the Adopted Core Strategy and the specific issues set out in the AAP. The Spatial Planning solutions to these are identified in this plan and it is satisfied that the proposals it has put forward meet these objectives and issues.

40. The development would result in the loss of important trees eroding the landscape and biodiversity of this part of the park.
   The Council acknowledges that the development will result in change to this part of the park. It considers that the majority of trees that will be affected are ornamental and offer limited value to biodiversity than other more sensitive native groupings of trees in the park. It considers that appropriate planting of trees as part of the new proposal and mitigation locally can heighten biodiversity habitats and species in this particular locality. On balance the Council concludes that the overall development will improve the environmental characteristics of the park thus meeting the spatial planning objectives and specific issues outlined in the Core strategy and this AAP. A stage 1 Habitats Assessment has been undertaken. Work is underway to carry out the further survey work identified in the stage 1 assessment, which will form part of the planning applications.