Supplementary evidence on submission on Central Park Area Action Plan
Friends of Central Park – April 2008

CP1: is the level of development inconsistent with the Park’s primary function, and guidance on protection of open spaces?

The idea driving CP1 is of an ‘iconic’ multi-use complex and centre of regional sporting excellence, justified on grounds of public and social health and to help reinvigorate Plymouth (1). Yet the ‘Rolls Royce’ Centre envisioned (2) could instead be of interest to and affordable by few and at increasing cost to taxpayers. Changes to the level, and the type, of development proposed will more likely deliver an effective, sustainable and inspiring ‘destination Central Park’ for the region, city and people of Plymouth.

Central Park’s primary function is to provide open space, for formal and informal leisure and sporting activities, freely accessible to the people of Plymouth. Although only documents from 1958 onwards are available at the Land Registry, the 1923 Plymouth Corporation Act in the archive in Plymouth Central Library, and the minutes of the Hoe and Parks Committee meeting held on 31st October 1928, now in the Plymouth and West Devon Record Office, clearly state that this land was purchased originally, with financial support of the then Ministry of Health, to be a recreational park and dedicated as a public space for all time.

The Mawson Plan contained a coherent vision for a park of regional excellence, but many of its features have never been put in place or been demolished due to conflict of interests, the desire of certain parties for building development, and financial considerations. In 1981, the Hutton Report addressed the problem of building in the park:
4.3 (i) There is concern that the recent building developments have eroded the original concept of the park and that there is a danger of the park becoming a “concrete jungle”.
4.3 (ii) Clearly the Mayflower Centre and the Swimming Pool do provide important recreational activities at a central and accessible spot but there is a conflict between these and general open park activities.
4.3 (a) It is strongly recommended that when the present proposals have been constructed, no further development be permitted.
4.3 (b) ..... no further development be permitted thereafter.

Developments so far have involved increasing ‘enclosure’ and privatisation of the accessible open space – for example demolition of the outdoor tennis courts, leasing of the cricket pitch to Home Park and the subsequent eviction of the cricket club, and sale of the stadium building and surrounding area to Argyle, which plans to commercially develop this land with retail, etc. The provision for 5,380m³ offices for the sake of providing employment is not appropriate for a Park. All these developments are contrary to the original ethos of providing a recreational park which is a public space with free access for all.

PPG17 indicate the need to value green open space as a natural asset with (largely non-monetised) benefits. Following Diagram 1 in PPG17 (Annex 1), even if having demonstrated ‘land surplus to requirements’, there is a need to ask: “are the developer’s proposals widely supported by the local community?” (3). Neither applies here – Community and Neighbourhood Studies
indicate very different preferences. As stated by Sir Clive Booth, Chair of the Big Lottery Fund: “Parks are a vital free space in which people of all generations and backgrounds can come together”(4).

Affordable and effective public and social health

Efforts to reach the public health target of an extra 4% of Plymouth population (~9,200 extra ?) becoming more active are focused on indoor gyms and other facilities yet these are not the most universally attractive way of sustaining active lifestyles; only 12% of the adult population go to private gym or public leisure centres (5). Even the neighbourhood regeneration – funded gym in Stonehouse has only 180 adult members and 27 junior members ‘after several years of hard work’ (6). There are already many gym facilities for people who want to / can afford to pay in Plymouth, and gyms probably “serve those people who are already least likely to be inactive and obese” (7)

The target, alongside other health, economic and environmental benefits, is more likely to be met through informal, and outdoor, activities. Females especially are put off the ‘sweaty, muscular image’ associated with formal sports, and many, of all ages, would prefer activities such as gardening or dancing. The Community Studies demonstrate that people value the Park for relaxation and informal activities, a finding underlined by the BBC Breathing Spaces campaign. Mothers want places they can take their children for free, and school-age children need holiday and evening informal leisure facilities. (8).

The ‘Get Plymouth Active: analysis of need’ report is incomplete, e.g. it does not include the existing gym stations at the Jan Cutting Centre. It does not provide a justification for all the facilities in CP1, nor cover the popular priority sports of cricket, running and tennis, despite a running track and tennis courts being major features in the original Mawson Plan. There are reportedly 1,300 bowls players in Plymouth, yet six out of 10 rinks have closed in recent years and one club struggles to find enough players each week (9). Outdoor free tennis facilities are more likely to meet needs of low-income families rather than indoor tennis, which is available at other centres. The idea that CP1 is ‘worth the loss of just the equivalent of a couple of football pitches’ may be true for higher-income people, but those with no extra disposable income might benefit far more from the space as a couple of football pitches. There needs to be some guarantee that any new facilities will be ‘affordable’ – for those on lower incomes, who need the facilities most and not just ‘elitist’.

While formal facilities struggle to maintain members, there are reportedly 600 people on waiting lists for allotments in Plymouth – up by 100 people, or around 20%, in just one year. With rising fuel and food prices, community gardening or allotments can do far more to increase public health and reduce income inequalities by providing cheap food (an allotment can produce hundreds of pounds’ worth yearly) and exercise in the open air. There is also growing evidence for biophilia - a measurable, evidenced, and very significant benefit to health and wellbeing of engaging with nature (10). Community gardening offers opportunities for all age ranges and provides social cohesion. Botanical and wild gardens provide spaces for relaxation and need protection and enhancing rather than eroding.

Further health benefits come from just being outdoors. Vitamin D significantly reduces risks of cardiovascular disease and major cancers, and enhances immune function. Yet studies estimate
that 90% of the population are deficient in it (12). One hour’s walk outside even in winter provides useful physiological and psychological benefits. (13).

The 13-18 yr old group are in need of free facilities (cf Play England and the ‘nature deficit disorder’ (11)) and funding (e.g. Adventure Playgrounds and My Place) could be applied for. In collaboration with the expert facilitators at TR2 and other youth leaders in the city, far more imaginative and exciting options could be developed – for example, an open air theatre in the natural amphitheatre by Pounds House. An easily erected temporary structure could provide cover against rain and our young people could be guided and encouraged to organise their own theatre, cultural and sporting events in the park.

If social and cultural centre facilities are specified for Pounds House and the Cricket Pavilion, this will take pressure off land needed for new build, and provide for community ‘ownership’ and enterprise (cf Quirk in Sheffield with annual turnover of £1.5m and 90 staff) - and help to provide a ‘joined up’ Park. Other ‘cultural centres’ for dance/music already exist or are planned in Plymouth e.g. University, TR2, and Royal William Yard.

**Regional sporting excellence**

Upgrading of the swimming and diving facilities is needed. An ‘iconic’ centre for these, imaginatively and sustainably built, would be enough at least to begin with, and feasible. If the proposal for this was separated out, lottery or similar funding would more likely be obtainable. Alternatively, the current pool could be refurbished and a site in the north of the city used for the Olympic-sized pool (as previously planned when the Lottery bid failed).

The other facilities proposed put unnecessary pressure on the ‘priceless’ natural environment of the Park, and the need for them - for public health or as inherent to a regional centre of sporting excellence - has not been clearly demonstrated. Other sites have been rejected, for example because they jeopardise the Boulevard in Millbay, but this does not justify building on the Park. The ice rink’s current site is accessible to its main customers where it is, and the Drake Circus development has shown that the Mackay Plan is not definitive. It would be better to put efforts into upgrading existing or brownfield sites for different facilities, rather than squeeze all together on one site. Brickfields was promoted as a ‘regional centre of excellence’ for athletics and not yet reached its potential. The climbing wall and indoor sports, could be located near Marjons, and could then link in with the teaching of sporting skills.

CP1 facilities operated commercially undermines the original idea for the Park to remain free from urban and commercial development – the vendors sold their land at a greatly reduced rate for this reason. The ‘step change in quality necessary to make Central Park a premier destination within the city’ can still be achieved with excellent swimming/diving facilities combined with greatly enhanced open-air facilities and spaces, botanical and wild gardens, imaginative adventure playgrounds. Rather than ‘something to interest and excite everyone’ within one complex, the preferred option is for more dispersed and varied facilities and spaces, throughout the whole Park and city.
The initial cost and the ongoing subsidies of running a large facility could end up being an added cost to Plymouth taxpayers (cf Pavilions). If the management is outsourced, any profits are likely to leak out of the local economy to a national company.

**Deliverable within the timescale set out**

Delivery costs are highly likely to rise, e.g. price of wood doubled in the last eleven months, oil prices rose by 70% in a year. Plans need to prioritise upgrading the swimming and diving facilities before committing to other facilities with viabilities susceptible to a downturn – if parents cut down on pocket money, projected numbers are likely to be optimistic (14). Instead, open spaces are “open-air sitting rooms for the poor” (Octavia Hill, National Trust) and increasingly scarce - Plymouth has high density population, one of the highest private debt levels in the country, and lower than regional- and national- average income. ‘Get Plymouth Active’ uses the comparison of Crawley, yet the economy there is very different. The proposed ballots on spending priorities (15) could well result in deciding that funding needs to be allocated elsewhere, for example, keeping the lottery-funded Mount Wise pool open after 5pm (16), and continuing funding for basic needs services. (17).

**Are CP2, 5 and 6 the most appropriate in the all the circumstances**

Major concerns exist about economic downturn, climate change and social fragmentation and CP2, 5 and 6 need to be resilient to meet challenges. The economic situation raises questions about the reliability of financial planning for CP2 and CP5. The Stern report indicates ‘business as usual is not an option’ (18) – there is a critical need for carbon sinks (trees/vegetation) and reducing CO₂. The need for housing is for the affordable rather than the ‘executive’ home; CP5 and 6 are designed to appeal to the latter – whilst a few people would get this, far more would have less of a view of the Park, and less Park to visit.

The desire to attract inward investment (19) means that ‘bargain basement’ deals may be accepted (cf Home Park sale). To build on the ‘prime real-estate’ Park jeopardises its primary function: “The primary aim of this plan has always been to make significant improvements to the fabric of the park in addition to the building of the Life Centre and its associate works. Development is only justified in the context of this overarching aim.”(20). Although “from March 2000 to May 2000 several thousand people gave their views on the future of Central Park” (21), it is not clear that analysis of these contributed to CPAAP.

**CP2: Home Park facilities**

The commercial development needed by Argyle to pay for the completion of the stadium building will make existing problems worse - traffic congestion, pollution and risk will increase. It will hinder the other functions of the Park and pedestrian routes probably be blocked further.

A clause on the sale of Home Park land stipulates a payback on appreciation of capital value if the land is used other than for football. If people find it increasingly hard to pay for match tickets, the uses allowed in CP2 would enable relocation of the stadium to another site as has happened in other cities. This could benefit other Park users (no traffic, helicopters and police sirens on match
days, or widespread view of a poor-quality, industrial-like, building instead of trees). Although there are many new hotels and conference centres recently built or planned in Plymouth, one here might provide an alternative, less-intrusive, use for the land at Home Park than the current celebrity- and big-business- fuelled football and pop concerts. Retail outlets are not appropriate and there are plenty of empty shops in the city centre. The proposal needs to be either for just completing stadium work within the current area or a hotel/conference centre. The fact that it will still be a chunk of private commerce in the middle of Central Park seems for now unavoidable but it can be contained within current boundaries.

Ten pin bowling is an activity arguably susceptible to economic downturn; the facility at Plympton closed down as it couldn’t be sustained even in an area of higher income.

CP5: Peverell Park

Any extra increase in traffic on this corner is likely to cause congestion, increased pollution and risk. A clear risk assessment has not been undertaken of the proposal, and there is no guarantee that buildings would not be occupied by paedophiles. Rather than building and car-parking (most people who use these shops walk there), it could be a welcoming entrance with an immediate view of trees and Park, not buildings, alongside improved toilets and play facilities on more open view. Any buildings need to enhance not encroach on views of the Park. A row of buildings will block the view and thus sense of arrival at the Park. People like to see the park as they drive past. Open vistas from the road to the park should be maintained and improved where possible.

CP6: Pennycomequick

Building on Park land is being justified on economic grounds, and to ‘mend a poor relationship’ of current buildings with the park. Yet any ‘poor relationship’, as elsewhere, can be put right with low-cost planting schemes and, for example, play facilities or community gardens. This would be better than selling Park land off to private commercial developers.

The land currently being built on by Taylor Woodrow Wimpey is in fact covered by a restrictive covenant (Land Registry Title No.DN55617): “No building of any kind shall be erected on the premises except a private dwelling house on the site of and in substitution for the present dwelling house.” The ‘wrap-around’ development proposed for Pennycomequick is in direct violation of the 1923 Plymouth Corporation Act, which limited the building of houses to plots facing on to the then existing roads, surrounding the park. (22)

To sell off land in Central Park for the sake of ~£1million would be to lose an area of open greenspace within the city for ever and assumes that it is not worth more than that to people now and in the future as open space. If ~£1m is needed now to pay towards the estimated cost of the Centre, then how much more land will be needed if costs escalate? Already asset sales of £24.5m, and borrowing of £15m, are budgeted; another £1m borrowed rather than paying with Park land is the preferred option. If ~ £1m is needed to fund planned improvements to the Park, then the preferred option is to make gradual improvements (as envisaged by Mawson) at low cost with community involvement. (23)
A sound funding application in genuine consultation with people to enhance the Park fabric providing diverse habitats and spaces can be developed. To lose open space to improve other parts of open space is to ‘rob Peter to pay Paul’ – nibbling away at the edges: ‘no-one will notice a little bit more’, ‘death by a thousand cuts’. Yet “The recreational quality of open spaces can be eroded by insensitive development or incremental loss of the site” (23). Also (24): “Greater emphasis needs to be given to refurbishment of the Park in line with the Mawson concepts and to identifying the necessary funding. The creation of high quality open space is as important if not more important than creating new sporting facilities and requires an equivalent budget.” As stated in one leaflet before last May elections: “who could imagine London’s Royal Parks being sold off in this way ...”“Keep off the grass!”

A coherent, inspiring vision for Central Park can draw on the Mawson Plan as well as contemporary experiences of venues such as the Eden Project – ‘Eden in Plymouth’? The links between engaging with nature and experiencing good health, social, emotional, mental, and physical, are undeniable. It would be ironic if, just as this is realised, Plymouth tarmacs and concretes over its main Park in pursuit of a ‘Posh’n’Becks’ style plan. If genuine community participation is stipulated in planning for the Park, the Plan will be more likely to succeed. The Park has the potential to be a premier destination in the city and for the region, by providing a range of high quality varied open spaces for formal and informal sports and leisure in a natural environment.

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“Erosion of public space undermines the very fabric of society ... Public space should not be seen as an additional “amenity” for urban areas, but as an essential element of urban infrastructure.” (Richard Rogers, Guardian, 17 March 2008)

“A stroll in the park increased self-esteem in 90% of a group of people suffering from depression, and 71% reported decreased levels of depression. After a walk through a shopping centre, 44% said their self-esteem had dropped, and 22% felt more depressed. (Guardian 15 May 2007)

“I passionately believe that communities need better and greener public spaces. The benefits to public health, the environment and ecology of open spaces are well evidenced. Research also shows that good parks have the same economic benefits on house prices as good schools. Parks provide outside gyms that can be enjoyed by all. For example Westminster primary care trust has begun referring patients to Regent’s Park. The 170,000 trees across the royal parks also act as a carbon sink.” (Martin Camley, Chief Executive, The Royal Parks, Guardian 19 March 2008)

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3. PPG17 para 10
5. Mintel / Fitness Industry Association 2007
6. LSP Newsletter February 2008 (?)
7. Maguire, Guardian 04.01.08
8. For example the Jack Petchey Foundation summer scheme in 18 London boroughs, cited in ‘Parents struggle to find or afford summer childcare’, Guardian 11 July 2007
14. On current trends, by 2026 the total participation in sport in England could be 900,000 fewer than at present, Sport England estimate, 2000.
20. Plymouth City Council Meeting papers 10 December 2007 (8).
21. Drake Community Study.
22. This act is available in the Local Studies department of Plymouth City reference library.
23. As Buckingham Fields campaigners and those in Southampton, people have very different views of preferences for use of open space than planning departments and councillors keepcroxleygreen.co.uk
24. cf. PPG17, p.10
Diagram 1: Redevelopment of an Existing Open Space or Sports/Recreation Facility

START
Has the local authority undertaken an assessment that is fully compliant with PPG17?

Yes

No

No

Is the proposed development on an existing playing field?

Yes

Does the proposed development satisfy the policy tests of para 15 of PPG17?

No

Grant permission, subject to a condition or obligation to secure the replacement provision, if required, provided the proposals are acceptable in terms of other relevant policies

Yes

Has the developer demonstrated through an independent assessment that the land or buildings are surplus to requirements? (PPG17, para 10)

Yes

No

Are the developer's proposals widely supported by the local community? (PPG17, para 10)

Yes

No

Will the proposed development secure the conversion of other land to substitute for the loss? (PPG17, para 13)

Yes

Grant permission, subject to a condition or obligation to secure the replacement land, provided the proposals are acceptable in terms of other relevant policies

No

Does the land provide an important local amenity and offer recreation and play opportunities? (PPG17, para 11(i))

Yes

No

Yes

Does the land provide a community resource and can it be used for informal or formal events? (PPG17, para 11(ii))

No

Yes

Does the land particularly benefit wildlife and bio-diversity? (PPG17, para 11(iii))

No

Grant permission, provided the proposals are acceptable in terms of other relevant policies

Refuse permission

Yes

No

Is there a deficiency of any other form of open space or sport and recreation provision? (PPG17, para 12)

Yes

Grant permission, subject to a condition or obligation to secure the use of some of the land to reduce the deficit(s), provided the proposals are acceptable in terms of other relevant policies