

## **Plymouth City Council Local Development Framework**

### **City Centre and University Area Action Plan Pre-submission stage**

**August 2009**

#### **Statement of Consultation – As required under Regulation 27**

#### **Regulation 25 Statement – Public participation in the preparation of a development plan document**

This document details:

- How the Council has dealt with consultations as required under Regulation 25



## **Plymouth City Council Statement of Consultation**

### **This statement has been prepared to comply with the requirements of Regulation 27 of the Town and Country Planning (Local Development) (England) Regulations 2009**

It details how the Council has dealt with consultations, how representations have been sought and how representations have been received and addressed in preparing the City Centre and University Area Action Plan (AAP) under Regulation 25

### **Consultation under Regulation 25 - Issues and Options consultation**

Regulation 25 of the Town and Country Planning (Local Development) (England) Regulations 2009 requires the Council to undertake Issues and Options consultation on all Development Plan Documents (DPD) with specific consultation bodies and general consultation bodies as they feel appropriate.

During this period the bodies outlined in Appendix A were consulted in the following ways:

The Issues and Options stage of consultation marked the launch of Plymouth's Local Development Framework (LDF), 17 individual documents focusing on individual topics and areas within the city were produced, 8 of these documents were Issues and Options Area Action Plans. These also helped inform the Core Strategy at Preferred Options and Submission Stages. The City Centre and University AAP was document 12.

A six-week consultation period from 7 March until 18 April 2005 was held on the Issues and Options for the City Centre and University AAP and other documents.

During the six-week consultation period copies of the City Centre and University AAP, Sustainability Appraisal, response forms, the statement of availability and proposal matters were available on the Council web page, from the Civic Centre and Windsor House Offices, local libraries and Council housing offices.

Letters were sent to consultees, a copy of the letter of notification is available in Appendix C.

Presentations to Area Committee meetings were given, introducing the new LDF system and its component documents, including the City Centre and University AAP.

A Local Development Framework launch event was held on the 23 February 2004 with key stakeholders invited to attend. Letters of invitation were sent to key stakeholders and copies of the Issues and Options document were made available with the DVD – 'An invitation to aspire'. The leader of the Council and Officers gave presentations and were on hand to answer questions.

## Summary of Consultation responses at Issues and Options Stage

The table below sets out the number of comments received in relation to the City Centre and University AAP.

Issues and Options Document	Number of comments expressing concern	Number of comments expressing support	Number of other comments	Total
12. City Centre and University AAP	6	8	23	37

A document setting out a summary of the main issues raised is available in Appendix D.

## Consultation under Regulation 25 - Issues and Preferred Options

Having taken onboard comments raised during the City Centre and University AAP Issues and Options consultation, the Council produced an Issues and Preferred Options consultation document. This was consulted on for a six-week period from 3 November until 15 December 2008.

The consultation was carried out in order that the public had an opportunity to consider and make comment upon the ideas that the Council put forward as its Issues and Preferred Options for change in the City Centre and University area. The City Centre and University AAP is the first AAP to be progressed using the Local Development Framework Regulations which came into force in June 2008. The regulations have simplified the process of producing a DPD by removing the requirement for a 'Preferred Options' consultation stage. This means that Local Authorities should engage with stakeholders, the public and other organisations as appropriate to the subject matter of the LDF. This new consultation document refreshes the Issues and Options process by re-capping on some information that has been set out before and finalises the list of key issues which the AAP must address. It also sets a milestone in the process of producing the AAP by checking with the public and other stakeholders that we have correctly analysed the key issues. It moves the process on to the development of the strategy for the City Centre by setting out the 'key ingredients' which we believe should form the basis for preparing the strategy, and asking for views on these.

The consultation was carried out in conformity with the Statement of Community Involvement, the aim being to enable and empower people to take an active part in the Development Plan process; all of the bodies outlined in Appendix A were consulted. This has been achieved by widely publicising the plan and the opportunity for consultation in the local press, radio and TV, via the Council's website, at council offices and libraries. The Council also

produced leaflets outlining the AAP which were available at consultation events and various displays throughout the six week consultation period. The leaflets were also distributed to partnering agencies and contained a mind map expressing the most important issues for the City Centre. The unusual mind map format was used in an attempt to attract younger people to comment on the AAP through a vibrant design. The mind map was also enlarged and put on show in a vacant shop window on the main boulevard of Armada Way. This was designed to be thought provoking and attracted a lot of interest from the general public who saw the display whilst walking between shops or through the City Centre. These consultation advertisements and documents are contained in Appendix F.

The Council set up numerous consultation events around Plymouth during the period with the aim of engaging with the general public to get their input to the City Centre and University AAP. The consultation events are summarised below:

### **Plymouth Train Station**

Consultation events were held here at peak travel times, early morning and evening, with members of staff raising awareness about the AAP and encouraging people to comment on the plans.

### **Drake Circus Shopping Mall**

Drake Circus was used for consultation events running from 18 November until 22 November 2008 in an attempt to get the general public to comment. Leaflets were handed out and a stand was displayed on the ground floor of the shopping mall focusing on shoppers who normally would not make formal representations.

### **Shopmobility**

A consultation event was held at Shopmobility in Mayflower Street with the aim of accessing 'seldom heard' groups within Plymouth and allowing them to access information on the AAP.

### **Pannier Market**

Consultations were held in the Pannier Market to address people shopping and working in the Independent Quarter. On a separate occasion 'street entertainers' performed in the Pannier Market and Independent Quarter. They dressed as a film crew and using the images displayed on the 'Virgin' shop windows asked people in and around the Market area their views and opinions on the City Centre.

Exhibitions and displays also ran throughout the six-week consultation period at Central Library, the Civic Centre and Plymouth Guildhall. At these events information was available to take away whilst maps and diagrams were also presented on display boards which remained at the venues throughout the consultation. The Council also attended meetings with local residents groups, 'seldom heard' groups, local stakeholders and businesses. Listed below are some of the meetings attended by the Council with the aim of engaging with communities and businesses:

- Disability Action Network
- English Heritage South West
- Plymouth Chamber of Commerce
- Plymouth Conservative Group
- Plymouth Design Panel
- Plymouth Labour Group
- Prudential Property Investment Managements Ltd
- Public Art Steering Group
- Stonehouse Residents Group
- University of Plymouth
- Youth Parliament

A City Centre ‘fly-through’ was prepared by BDP (Urban Designers) as part of their work on the Plymouth City Centre 'Future Direction: Investment and Development Strategy'. It represented simply one set of ideas of what Plymouth City Centre could be like in twenty years time. It was not in any way a definitive view of what the City Centre will be like in twenty years time but may show some features of what it could look like. The ‘fly-through’ was displayed on the ‘big screen’ in the City Centre at prime time so that the general public could comment on some of the ideas shown.

### **Summary of Consultation responses at Issues and Preferred Options Stage**

The table below sets out the number of comments received in relation to the City Centre and University AAP.

Issues and Preferred Options Document	Number of comments expressing concern	Number of comments expressing support	Number of other comments	Number of comments not related to the AAP	Total
City Centre and University AAP	130	57	47	3	237

A document setting out a summary of the main issues raised during this consultation is available in Appendix I.

### **Consultation under Regulation 25 - Sites Newsletter**

The City Centre and University AAP sites newsletter was part of the Councils commitment to involve people in the preparation process for the AAP.

The newsletter identified some key sites that the AAP would be considering. It also identified what the evidence base reports suggested might be appropriate ideas for sites. This information formed part of the Issues and Preferred

Options consultation held in November 2008 and this was highlighted again as part of the Council's continuous engagement with the public.

The newsletter was sent out to people via e-mail or via post directly to their door, with responses welcomed by the Council in a variety of forms including by letter or via e-mail. This was an informal consultation so all types of responses were welcomed by the Council.

The whole of the Council's consultation database, which includes the bodies outlined in Appendix A, were notified of this newsletter. This includes all councillors and statutory consultation bodies. The newsletter was also available from the Civic Centre and all libraries within Plymouth. As well as the consultation database all City Centre business and stakeholders were notified of the sites newsletter asking for their responses.

A document setting out a summary of the main issues raised during this consultation is available in Appendix K.

A copy of the City Centre and University AAP sites newsletter can also be found in Appendix J.

### **How were the issues addressed in the Area Action Plan?**

The City Centre and University AAP is the product of a great deal of engagement, joint working and consultation stretching over a long period of time, as set out in this Statement of Consultation. At each stage, comments and advice from stakeholders have been gathered and used to develop the strategies set out in the AAP. In particular, the Plymouth City Centre Company has been involved at all stages providing advice on the needs of the City Centre and ensuring that the interests of the City Centre traders are well represented in the strategy now being set out by the AAP.

It is therefore difficult to set out in detail how each and every comment and issue has now been reflected in the policies and proposals now contained in the AAP. The Council has, however, produced a number of documents which broadly set out the main issues which have been raised and identified, and how the AAP and the Strategy for the City Centre has dealt with those issues. These documents are:

- The City Centre and University Issues and Options Response Report (Appendix D of this Statement of Consultation)
- The Issues and Preferred Options Sustainability Appraisal Document (November 2008)
- Summary Report of the City Centre and University AAP Issues and Preferred Options Consultation, (March 2009) (Appendix I of this Statement of Consultation)

- The City Centre and University AAP Pre-Submission Sustainability Appraisal Document (August 2009 – available on the Council website)
- The City Centre and University AAP Pre-Submission ‘You Said, We Did’ publicity leaflet (August 2009 – available on the Council website)

These documents, when taken together and read alongside this Statement of Consultation, tell the story of how the City Centre and University Area Action Plan was created.

### Some of the Main Issues

Many of the issues raised over the course of preparing the AAP can be summarised into general themes. The most significant of these themes are summarised in the table below, along with a brief commentary of how they are dealt with in the AAP. More information on the issues raised and the Council’s approach to them in the AAP can be found in the above documents.

Key Theme	How the theme is addressed by the AAP.
The strategy for the City Centre must be commercially sound and deliverable.	The Council was keen to ensure that the aspirations for the City Centre set out in the Core Strategy could be delivered. A key piece of the evidence base for the AAP is therefore the ‘Plymouth City Centre Future Direction Investment and Development Strategy’, prepared for the Council by Cushman and Wakefield. This sets out a commercially based strategy for change, which has been used to formulate the proposals in the AAP.
The historic environment must be fully considered in the AAP, it should be given due importance and integrated into the strategy, policies and proposals.	The Council has always been keen to ensure that the City Centre’s heritage is recognised and fully integrated into the AAP. The Evidence Base document ‘Plymouth City Centre Precinct: Assessment of strategic options for the management of its heritage assets’ was produced by the Council in 2008 to help inform the debate. Nevertheless, a number of comments were received as part of the Issues and Preferred Options consultation in November 2008 remarking that the historic environment was not being given due weight. In response to this, the Pre-Submission AAP now puts the City

	<p>Centre heritage at the heart of the strategy. Specific policies set out how the City Centre heritage will be conserved and enhanced (CC01, CC02, CC07, CC19), and the City Centre concept (paragraph 3.4 – 3.6) sets out how the Council sees heritage playing a part in the future of the City Centre. The AAP makes it clear that the most important parts of the Abercrombie and Watson ‘Plan for Plymouth’ should be conserved – i.e. the ‘Beaux Arts’ grid of streets and the Royal Parade blocks. In this way, the AAP integrates the City Centre’s heritage with its future.</p>
<p>The AAP must ensure that access to the City Centre convenient for all modes.</p>	<p>The strategy in the AAP is underpinned by the ‘City Centre Transport Model and evidence base’. In order to ensure that access to the City Centre, particularly by public transport, is maintained, policies CC06 and CC07 set out that the role of the strategic road network should be maintained and enhanced and its capacity should be preserved. Where improvements to the strategic road network are necessary, these are shown in the delivery scheme.</p>
<p>The quality of design and architecture in the City Centre must be high.</p>	<p>A number of comments were received at the Issues and Preferred Options stage expressing reservations about the images used in the Cushman and Wakefield Study ‘Plymouth City Centre Future Direction Investment and Development Strategy’. These images were meant to be representative of the sizes and broad dimensions of City Centre blocks and to give a flavour of changes which could take place – they were not meant to be actual impressions of what the new developments will look like. The AAP aspires to a high quality City Centre, as set out in Strategic Objective 2 and individual proposals, including Policy CC03 dealing with the public realm. It should also be noted that other parts of the LDF which promote high quality</p>

	<p>design, such as the Design SPD and Development Guidelines SPD, will be applied in full to City Centre proposals. Finally, it is likely that the strategic change proposals will be elaborated in Design briefs to ensure the Council's aspirations are realised.</p>
<p>There needs to be guidance on housing in the City Centre/there should be affordable housing in the City Centre.</p>	<p>In the Issues and Preferred Options consultation document, it was suggested that the Core Strategy affordable housing requirement could be relaxed for developments in the City Centre precinct. This generated a number of objections, in response to which the AAP now proposes that the Core Strategy affordable housing requirement will only be relaxed on the 3 strategic proposals (CC08, CC11, and CC14). All other developments in the City Centre which would trigger the Core Strategy requirement will be asked to provide affordable housing. Concern was also raised about the need to provide a range and mix of housing types in the City Centre. The AAP proposals tend to be large, mixed use developments where it is reasonable to expect that a significant amount of housing will be provided. The precise numbers and sizes of dwellings will be confirmed as detailed proposals are developed. Policy CC04 therefore sets out how the Council will require developments to provide a range mix and type of housing which will lead to the creation of a sustainable community in the City Centre.</p>

## **Appendix A**

List of bodies consulted

## **Appendix B**

City Centre and University AAP Issues and Options document  
Preliminary Sustainability Appraisal  
Consultation Response Form  
Notice of Proposal Matters  
Statement of Availability

## **Appendix C**

Letter of notification sent to consultees at Issues and Options stage  
Press advertisement for Issues and Options consultation  
List of invitees to LDF Launch Event 23<sup>rd</sup> February 2004  
Invitations letter sent to key stakeholders

## **Appendix D**

Report summarising consultation responses to City Centre and University AAP Issues and Options document

## **Appendix E**

City Centre and University AAP Issues and Preferred Options document  
Sustainability Appraisal  
Equality Impact Assessment  
Consultation response form  
Sustainability response form

## **Appendix F**

Press advertisement for Issues and Preferred Options in Evening Herald  
Sample City Centre and University AAP consultation posters  
Window Vinyl placed in 'Virgin shop'  
Plymouth Medical newsletter  
'Talk Shop' advert  
'City Centre the focus of big discussion' Council press release  
City Centre and University AAP consultation plans photo  
LDF newsletter November 2008  
LDF newsletter January 2009  
Selection of drawings showing ideas for the City Centre from children at Lipson Vale Primary School

## **Appendix G**

Letter of notification sent to consultees at Issues and Preferred Options stage  
E-mail of notification sent to consultees at Issues and Preferred Options stage

## **Appendix H**

City Centre and University APP Issues and Preferred Options consultation leaflet

**Appendix I**

City Centre and University APP Issues and Preferred Options consultation summary document

**Appendix J**

City Centre and University AAP special sites newsletter

E-mail of notification sent to consultees for special sites newsletter

**Appendix K**

City Centre and University AAP sites newsletter response summary document