

## PLYMOUTH CITY CENTRE AND UNIVERSITY AREA ACTION PLAN

### COMMENTS FOR HEARING ON 26TH JANUARY 2010 FROM STONEHOUSE RESIDENTS' ASSOCIATION.

#### 1 Areas of agreement with the AAP

Broadly speaking, the plan is welcomed and our objections mainly relate to omissions or to failure to take the plan far enough rather than to major disagreements.

The 8 Strategic Objectives seem non-controversial, as defined in paragraphs 3.7 to 3.14 of the AAP,

(except that these objectives should more appropriately, we feel, relate to the whole City Centre rather than to the functional districts labelled in Objectives 4 - 8 inclusive. The AAP seeks to enliven the City Centre as a whole, whereas the definition of these functional districts might discourage the rich variety of uses needed throughout the City Centre to achieve the vision set out in the AAP).

We agree with policies CC01, CC02, CC03.

However, the loss of public realm and planting in the recent £3 million scheme to introduce cars and a little car parking in a previously pedestrianised zone (see AAP paragraph 5.10) is deprecated. This is inconsistent with the aim in CC03 of promotion of permeability through the City Centre for pedestrians and cyclists and it seems very unfortunate that this work was allowed to proceed and to be completed while the AAP is still unapproved.

We agree with Policy CC04 on creation of a sustainable City Centre Neighbourhood, but, as noted in our comments of 7th October, we are unhappy about point 6 which implies that basic amenities for sustainable living may be omitted from detailed plans for the City Centre. Schools, nurseries, children's playgrounds on so on should all be specifically included to bring the neighbourhood to safe and sustainable life. It should not be necessary to travel outside of the neighbourhood for these amenities.

We agree with Policy CC05,

and with Policies CC06, CC07, subject to our points 2.1 and 2.3 below;

with CC08 subject to our 2.2 below;

with CC09,

with CC10 except the element about car parking, see 2.2 below;

with CC12,

with CC13 except that the plan could contain specific action to attract a very high profile prestigious national retailer to a key site (which could be located at the currently hoarded vacant land near the Money Centre and Drake's Circus and which could bridge or cantilever over the public open space towards the Methodist Central Hall);

with CC14 except that it omits relocation of the bus station to be close to the railway station and any provisions about the High Quality Public Transport system, see 2.3 below and Strategic Objective 3 point 2,

with CC15, CC16, CC17,

with CC18 except that we strongly oppose the siting of tall buildings anywhere other in the Station or University areas. Any tall building to the south of the key areas of the City Centre would cast shadows and harm the general amenity and feeling of well being which the relatively low-rise spacious City Centre layout currently offers - in the Plymouth context, a tall building could be considered as anything over six storeys

and we agree with CC19.

## 2 Soundness and Effectiveness: Main Concerns about the AAP

### 2.1 CC06 The Strategic Road Network, especially the Inner Ring Road and Strategic Objective 3 "to create a safe and accessible City Centre for all transport modes"

We believe that the actions listed in Policy CC06 will not be effective unless they include removal of the Inner Ring Road from the surface level around the City Centre.

We see the failure to deal adequately with the Inner Ring Road as a fatal flaw in the AAP. We regard this road as the prime obstacle to the achievement of many of the other objectives and policies in the AAP, which renders the AAP likely to be unrealisable and ineffective in many respects.

The pre-amble in the AAP and the Sustainability Appraisal both recognise that this road presents a major barrier to pedestrians, cyclists, private vehicles and public transport in the free interflow between the City Centre and its near and further hinterland. It prevents the proper integration of the City Centre with immediately adjacent neighbourhoods. We consider that it is simply not possible to allow free movement of private vehicles along this route at speeds up to 30mph whilst providing the numerous surface level pedestrian and cycle crossings over the Ring Road needed to integrate the City Centre sustainably, conveniently and attractively with its surroundings.

The plan fails to call for the root and branch re-engineering of this road necessary to overcome these problems.

[We perceive three different approaches to the possible resolution of this key difficulty:  
 1) exclusion of private vehicles from the Inner Ring Road, which would imply a negative effect and strain on other roads and communities further out from the City Centre,  
 2) reducing the maximum permitted speed limit to 10mph, which would cause great delay to private and more importantly, public transport or, preferably,  
 3) moving the vehicular carriageway underground, with gardens, linear parks, cycle routes, pedestrian routes and public transport routes all being on the surface or roof over the underground carriageway. The only major disadvantage of this approach, we think, would be its initial capital cost, plus disruption during the works.  
 A fourth approach, the provision of numerous pedestrian and cyclist bridges or tunnels, we consider to be a deterrent to integration and to convenient crossing of the Ring Road. Pedestrians like to take the shortest possible route from A to B and they need to feel safe while doing so].

2.2 Car Parking. There is no specifically numbered policy on location of car parks in the City Centre as a whole. AAP Paragraph 6.11 should be a policy in its own right under Strategic Objective 3. AAP Policy CC11 should be part of an integrated car parking policy. All new City Centre car parking except that at the Station should be underground, and solely for City Centre residents' and businesses' vehicles. (Much of the existing car parking is low grade and should be freed for redevelopment). Employees and visitors should expect to travel by public transport or park at the Station car park and travel to their City Centre destination on foot or by excellent public transport within the otherwise pedestrianised and cycle-tracked City Centre. (This excellent public transport should be planned to satisfy Objective 3 point 2).

Such an arrangement would then satisfy policy CC03 on permeability for pedestrians and cyclists and policy CC04 on Sustainability by excluding private vehicles except those belonging to residents and businesses completely from the City Centre. A large modern car parking facility should be provided as part of a major transport hub at the railway station, where the resited bus station should also be located, together with the zone of tall buildings providing the modern office accommodation called for to serve the new commercial centre of Plymouth, see Strategic Objective 6 and Policy CC14.

2.3 High Quality Public Transport system as called for in Strategic Objective 3 point 2. Despite being vital to the effectiveness of the AAP, there is no policy at all on this topic in the plan. We see this omission as the second major flaw in the AAP. Such a transport system

should, as mentioned in our comments of 7th October 09, include policies to make Plymouth the major Transport Hub for the South West, and to

- a) move the bus station to the railway station area,
- b) locate the major City Centre car park for visitors, shoppers, employees at the redeveloped Station,
- c) provide covered moving pavements or numerous small electric mini buses on designated marked courses between the Station and main City Centre and nearby destinations, such as the Barbican, The Hoe, Ebrington Street, Coxside, Union Street and, in the future, Millbay,
- d) provide all visitor and employee car parking at the Station
- e) provide efficient and totally co-ordinated interlinking of all transport facilities serving Plymouth including local and long distance ferries, bus, coach, rail and air services, and Station and outlying car parks and Park and Ride parks,
- f) provide ample weatherproof and well-lit shelters at bus and transport stops throughout the City Centre, with comforts (seats, coffees, teas) and conveniences nearby,
- g) provide bicycle hire points throughout the City Centre and beyond (as in Paris and Lyon).

2.4 Retail Area too large. The AAP recognises that the retail area is physically too extensive compared with cities such Southampton, Liverpool and Manchester which have a much greater population in their catchment areas, but it does not include any policies to reduce and concentrate the physical size of the retail area. This omission is likely to have a permanent dampening effect on the area as a whole, with all but the immediate vicinity of Drake's Circus being or becoming increasingly "run down". This omission is likely to jeopardise the achievement of the vision set out in Chapter 3 of the AAP and Strategic Objective 4. (A viable solution might be to plan redevelopment for a wide variety of other uses for the entire area to the west of Armada Way as far as the Western Approach, emphasising residential development with a full range of supporting amenities and infrastructure, including parks, gardens, allotments, play areas, schools, nurseries, medical centre, cafes, bars, community rooms or halls, cinema, small food shops, small specialist shops, small offices, high quality public transport and so on, with buildings of between 3 and 5 storeys to harmonise with the iconic post war architecture to the south and east of this western part of the present retail area).

2.5 Tall Buildings Policy. Despite section 2.4 of the EH/CABE Guidance on Tall Buildings 2007, the AAP lacks any clearly stated Tall Buildings Strategy and supporting Policy. Without this, an unrelated random scattering of tall buildings could result. There would be no proper co-ordination and inter-relationship, no visual amenity of clustering, no supporting infrastructures, no planning of microclimate effects including avoidance of localised windiness and loss of sunshine and daylight and no planning of effects on the local road system, parking and public transport. There should be a policy presumption against isolated tall buildings in the City Centre. In our comments, we proposed that new tall buildings should be restricted to the Station and University areas, which would avoid any overshadowing of the main public spaces within the City Centre as these would all lie to the south of the Tall Buildings Zone. This would be consistent with an integrated and sustainable transport policy. We are therefore dismayed to see in the local press today that work has already started on a 31 storey tower, see paragraph 11.6 of the AAP, south of Derry's Cross, before the AAP has been formally approved.

2.6 Missed Opportunities. The AAP dwells at length on retail shopping as the main plank of economic activity in the City Centre. This would seem to be a high risk strategy, especially in a world where the nature of retailing is fast changing and increasingly internet-based. By contrast, little space is devoted to Plymouth's numerous other advantages, which could be exploited and developed as multiple drivers of Plymouth's economic growth, as set out in our comments of October 2009.

### **3 Is the AAP Justified - Effective engagement of all interested parties?**

We do not consider that we have been allowed to engage effectively with the LPA in this matter. Engagement should be a two-way process.

For more than a year, we have been unsuccessful in our attempts to have any discussion with any relevant Plymouth City Council officer on the general aims or details of the AAP, or on how our comments have been received. This was true until today, 11th January 2010, when an officer concerned has agreed to a meeting later this week. At this late stage, it is difficult to understand how we would be able to have any influence on any aspect of the AAP.

There was no feedback after our first set of comments which was submitted in the consultation phase ending in December 2008, nor on our comments on the 2009 version, nor, apparently, any statement of how any comments have been viewed or treated by the LPA. As far as we are aware, the document submitted to the Inspector is unchanged from that we and others reviewed between August and October 2009.

There was no change control (and therefore no visible audit trail) between the 2008 and 2009 versions of the document.

The 2009 version was a total rewrite and redesign of the AAP document, making it extremely difficult to determine whether any of the comments on the previous version had been incorporated or not.

In conclusion, after a great amount of work reviewing this important document, we hope that the Inspector will see some merit in the points made above, that he will agree that the AAP is unsound in respect of those points and that the AAP will be amended to address the shortfalls we have identified.

Harry Vosper For Stonehouse Residents Association

11th January 2010

CC Mrs Jean Trevaskus, Chair, Stonehouse Residents Association  
Ms Lorraine Distin, Secretary, Stonehouse Residents Association.