

Central Park Area Action Plan – Submission Stage Representation from Friends of Central Park

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This representation is submitted by Friends of Central Park (66 members on an email circulation group) and other members of the public whose signatures testify their support for the suggestions and amendments we propose with reference to Tests of Soundness 1-9 (165 supporters) – 231 people in total. Friends of Central Park exists to preserve Central Park for the public's free access and use of its unique green open space in the heart of Plymouth. It is a campaigning group that seeks to enhance the park's recreational and relaxation features in an ecological context whilst standing in opposition to any further encroachments or developments of its present green spaces.

We accept the recommendations of the Central Park Area Action Plan that refer to park improvements and the provision of better sports facilities, on the footprint of the existing facilities, these being administered by the City Council and being available for use by the general public. Whilst welcoming such investment in Central Park, which has been poorly maintained for many years, we are of the opinion that the plan needs considerable amendment to make it sound. We are submitting below our suggestions and a summary of our major concerns.

We request the Planning Inspector to invite our spokesperson to make further representations and answer questions at the public hearing on behalf of the members of Friends of Central Park.

Furthermore we respectfully request that the Planning Inspector makes the following recommendations; which would address our concerns regarding the correctness of the way in which this document has been given approval by Plymouth City Council:

- 1. A simple, factual, letter outlining all the principle proposals in the submission stage document, including the planning proposals for Home Park, should be sent out with all the Council Tax statements this year. This letter should also inform the public that all the relevant documents are available for inspection at the main public library in the city centre.*
- 2. Details of the current proposals should be prominently displayed, for at least 2 months from the date on which the letters are sent out, in the glass-fronted display cases in the foyer of the main public library.*
- 3. Full financial details should be published in the public domain, including long-term costings, estimates of revenue, estimates for the maintenance, staffing and running the proposed Life Centre and the costs of servicing and repaying the relative loans. Comments and suggestions should be invited from the public, particularly with regard to possible sources of funding.*
- 4. Individual members of the public, community groups and sports clubs should be invited to submit comments to their councillors and/or the planning department on these proposals.*
- 5. Councillors should listen to the representations of the electorate during this 2-month period.*
- 6. At the end of this period there should be a free, non-party political, no whips allowed, vote in the Council Chamber. The voting should not be on the document as a whole, but each separate policy proposal within the document should be voted on separately by the council, thereby allowing the elected members of the City Council to truly indicate what the people want and what they do not want.*

Summary of the main concerns of Friends of Central Park with respect to the Soundness of this plan.

(We will provide further details at the public hearing if required. We have attempted to group our comments with respect to the specified Tests of Soundness. However these points are often relevant to more than one of the specified tests and therefore we request that they be taken into account as a whole, all of them being based on the concept of soundness.)

Tests 1-3: Procedural

1. The over-riding majority concern expressed at previous stages, of protecting Central Park from building development is still valid. This view is in synergy with the findings of the Hutton Report on Central Park (1981) Paragraph 4.3 (a) and (b).
2. Misleading and inadequate media coverage combined with inadequate diffusion of relevant information by the Council has led to a situation in which a large percentage of the public has no clear idea of what exactly these proposals entail. The present Conservative Council was elected on a manifesto stating that they would "Save Central Park" and not allow commercial building on the park. The public felt that they had expressed their opinion and stopped this proposal by voting Conservative.
3. The council website is cumbersome and difficult to navigate. The 'Examination Library' has been hard to access with some key evidence unavailable. There has been a lack of accurate and specific information on key proposals. Cf. Planning Inspectorate, 2005, Development Plans Examination, 3.3.5: The Examination Library did not include the Planning Policy Statement or the Planning Policy Guidance Note documents, or other key evidence. For example Appendix 1, the map, was missing from page 21 of the Habitat Survey.
4. The lack of a free democratic vote in the Council Chamber, many decisions being delegated and the final decision being taken ahead of the published schedule, with the plan only made available to councillors a few days before the vote, did not give elected council members time to discuss the changes made after the Preferred Options stage with local communities and groups and made it impossible for them to represent democratically the opinions of the electorate.
5. The principle of 'front-loading' and the Statement of Community Involvement need to be upheld by allowing for community involvement and discussion between the Preferred Options and Submitted stages. Friends of Central Park were not contacted during this time, despite assurance of being listed as a group for consultation (cf 4.25 of the Statement of Community Involvement).
6. Key information, for example regarding transport plans, finance and habitat protection is still unavailable and so the Sustainability Appraisal is incomplete.

Tests 4-5: Conformity (with Community Strategy, spatial plans, adjoining areas)

1. Proposals conflict with other local and national policies, reports and consultations. Evidence is not given of the need to waive the guidelines of, for example, Planning Policy Guidance Note 17.
2. The Central Park Area Action Plan 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.
3. The neighbourhood studies cited as evidence for this plan show that communities value the park above all for relaxation and informal leisure. This is already challenged by the location of Argyle within the park. Traffic congestion and associated risks, air pollution and parking problems would increase in these neighbourhoods if this large-scale development were approved. To make the plan sound, the scale of the development in this one location needs to be reduced.

4. Scaling down the proposed Life Centre would make more council funding available for neighbourhood open spaces and facilities in conformity with accessibility criteria, addressing needs for swimming and outdoor sports facilities in more priority neighbourhoods.
5. Any plan for sports facilities, that would be used by a larger number of people than the present facilities, will be more achievable logistically without the inclusion of offices, houses, retail development, a hotel, and a conference centre. These need to be taken out of the plan for Central Park completely. There is already traffic chaos around Central Park when Plymouth Argyle are playing. This is not the best location for additional facilities.
6. Plymouth is already densely populated, and this may affect the Core Strategy target on open spaces. After the creation of Central Park, the 1943 Plan for Plymouth described Plymouth as occupying "the unenviable position amongst the most densely populated county boroughs of England". Many of the Victorian properties around Central Park are used for multi-occupancy housing today, being sub-divided into small bedsits and flats. The population density is high and few people have the luxury of a private garden. Plymouth needs to preserve all the open green space it can. One comment cited in Greenscape Assessment 2000 is: "Plymouth Council has a mania for building high density housing and commercial developments on every available bit of land; open spaces are being swallowed up at an alarming rate".

Tests 6-9: Coherence, Consistency and Effectiveness

1. The overriding focus of the Central Park Area Action Plan is derived from the Destination Central Park report by Nathaniel Lichfield & Partners, consultants and property developers (only the Executive Summary of this is available in the public domain). This justifies building on green space on the grounds of enabling development or 'improving relationship' of the park to the city. These same consultants recommended the deletion of Policy 69 (for the protection of open space) at the Plymouth City Council Local Plan First Deposit stage in December 2001. A sound plan would include more initiatives and plans such as those included in the ODPM guide, How to Create Quality Parks and Open Spaces. This contains strategies for increasing feelings of safety, community involvement and social enterprise for the regeneration of neglected Parks.
2. The original 1920s plan for Central Park is quoted in the Historic Landscape Assessment: 'From the beginning it was intended that the Park should provide opportunities for passive leisure and active recreation'. A focus on informal, outdoor, leisure and recreation activities, as envisaged in this plan, is more likely to meet public health as well as financial, social and environmental habitat and biodiversity sustainability targets. Plymouth Points of View Survey is not cited, this found that walking, housework and gardening are all more popular than sport.
3. The Plymouth Corporation Act (1923) only made provision for land surrounding Central Park, adjoining streets, to be used for building. It was the original plan to preserve the park, in its entirety for all time. (Source: Report by E. Reuben Mawson to the Hoe and Parks committee. 31st October 1928.) This vision was violated when the current sports facilities were built. The Hutton Report, which was accepted by the then Council, (1981) states: "It is strongly recommended that when the present proposals have been constructed No further development be permitted." (Paragraph 4.3a)
4. CP1 and CP2 need to meet BREEAM standards rather than 'target' them.
5. A sound plan would reduce the scale of CP1 and CP2 to within their current footprints and include 106 provision.
6. The Urban Capacity Study is cited, yet this indicates many other possible locations for development, including locations for regional sporting centres, for example the quarry, which will

be accessible through transport infrastructure improvements, and the improvement of the ice-rink in its current location with performance and conference facilities sited elsewhere. The Capita Symonds Business case questions the inclusion of an ice-rink in Central Park.

7. CP3: No evidence has been provided to indicate that a shift to public transport can be achieved. There are no contingency plans to deal with increased traffic congestion and the risk of parking facilities being totally inadequate.
8. CP4 needs more detail and a proper budget to make the plan sound. A target of 'improved parkland' over 76Ha is not a substitute for the recommendation in Phase 1 Habitat Survey of habitat specific targets.
9. The historical and cultural significance of Central Park has not been adequately considered. There should be enhanced proposals for Pounds House and the Cricket Pavilion, not mentioned once in the Central Park Area Action Plan despite the Historic Landscape Assessment that was cited as supporting evidence. We also cite the City Strategy and Action Plan 2004/9, Target 15: 'acknowledging the importance of our historic buildings and open spaces'.
10. An assessment of quantitative elements is needed, analysing the new sports provision that is effectively required in Plymouth. No evidence is given in this documentation apart from a requirement for swimming pools. The 10,000 Life Centre petition by the local newspaper asking for Lottery funding is not a substitute for a needs analysis. It should also be noted that 15,000 signatures collected by communities in Plymouth did not affect the policy of building on West Hoe tennis courts. Reference should be made to ODPM, Assessing Needs and Opportunities: a companion guide to Planning Policy Guidance Note 17.
11. Drake and Trelawny Community Studies contain a response by Plymouth City Council to concerns about building on Central Park stating that: 'From March 2000 to May 2000 several thousand people gave their views on the future of Central Park. The results of this consultation exercise are currently being analysed. ' This evidence is not cited for the Central Park Area Action Plan. The Greenscape Strategy referred to is not yet available.
12. CP5/CP6: The enabling developments are in opposition to Planning Policy Guideline 17, and jeopardise the future protection of green space if allowed. 'Death by a thousand cuts'. The findings of the Hutton Report should be considered binding. Raising money from encroachment to fund enhancements to the park is unsustainable. The statements that funds raised in this way will be ring-fenced for park improvements and not for the Life Centre are irrelevant and misleading.
13. The Central Park Area Action Plan presents an elitist vision of the Life Centre. This is not appropriate when the people of Plymouth need sporting facilities that they can regularly use and can afford. The report made by the inspectors from the lottery commission, rejecting the request for lottery funding, highlights the flaws in the underlying philosophy of these proposals.
14. Circumstances have changed dramatically over the last two years. No detailed estimate of projected council spending to finance this plan has been published and the global estimate that has been suggested is suspect. Reference is, once again, made to the report of the lottery commission and the reasons why they refused to give any funding for the Life Centre. In the last year world steel prices have risen over 60%, with a subsequent increase in building costs for the Life Centre type of structure. Steel prices are still rising. The "credit crunch" has also dramatically increased borrowing costs and Plymouth City Council, already in debt, plans to borrow further to fund the Life Centre. Plymouth is NOT a rich city. Only last week the government announced that Devonport Naval Base will close in 5 years time. Unless very careful consideration is given to all

financial aspects of this plan, including not only the Life Centre but also the associated infrastructure, it is possible that this project could create a situation in which Plymouth City Council is unable to meet the costs of essential services in the city. Services for the elderly and for disadvantaged children have already been pared down in recent years. There are no clear mechanisms for the implementation and monitoring of the Central Park Area Action Plan. We need to proceed with EXTREME CAUTION.