

Coastal Access – Cremyll to Kingswear



Representations on CKW 1: Cremyll to Mount Batten Point and Natural England's comments

June 2020

List of Contents

1.	Introduction	1
2.	Background	1
3.	Record of 'full' representations and Natural England's comments on them	2
4.	Summary of any similar or identical points within 'other' representations, and Natural England's comments on them	5
5.	Summary of 'other' representations making non-common points, and Natural England's comments on them	7
6.	Supporting documents	
	• 6A - MCA/CKW1/R/6/CKW2871 - Photograph of the steps linking West Hoe Road to Soap St at the eastern side of Millbay Docks (CKW-1-A001)	
	• 6B - MCA/CKW1/R/12/CKW2658 - Report CKW 1 - [redacted] Representation	
	• 6C - MCA/CKW1/R/11/CKW0008- [redacted] Notes on Infrastructure	12

1. Introduction

This document details representations we have received on the stated coastal access report. These fall into two categories:

- Representations received from persons or bodies that must be sent in full to the Secretary of State ('full' representations, reproduced below); and
- Those which have not come from those persons or bodies whose representations we are required to send in full to the Secretary of State ('other' representations, summarised below).

It also sets out any comments that Natural England choose to make in response to these representations.

2. Background

Natural England's compendium of reports setting out its proposals for improved access to the coast from Cremyll to Kingswear was submitted to the Secretary of State on 15 January 2020. This began an eight week period during which representations and objections about each constituent report could be made.

In relation to the report for CKW 1: Cremyll to Mount Batten Point, Natural England received 12 representations, of which 3 were made by organisations or individuals whose representations must be sent in full to the Secretary of State in accordance with paragraph 8(1)(a) of Schedule 1A to the National Parks and Access to the Countryside Act 1949. These 'full' representations are reproduced in Section 3 of this document together with Natural England's comments where relevant.

As required by the legislation this document also summarises and, where relevant, comments on the 9 representations submitted by other individuals or organisations, referred to here as 'other' representations. Of those 9 'other' representations, 6 contain similar or identical points. Natural England's comments on 'other' representations are set out in two parts:

1. The recurring theme in the 6 'other' representations has been summarised in section 4 with our comments.
2. Any of the same 'other' representations that make other, non-common points are then commented on separately in section 5 alongside any remaining 'other' representations.

Before making a determination in respect of a coastal access report, the Secretary of State must consider all 'full' representations and our summary of 'other' representations, together with Natural England's comments on each.

A further representation was received from Gordon Guest, disabled access representative for Devon Countryside Access Forum, after the period of eight weeks beginning with the date on which the report was first advertised on Natural England's website. In compliance with Regulation 4(4) of the Coastal Access Reports (Consideration and Modification Procedure) (England) Regulations 2010 this representation has not been considered or passed on/summarised.

3. Record of 'full' representations and Natural England's comments on them

Representation number:

MCA/CKW1/R/6/CKW2871

Organisation/ person making representation:

[redacted]

Route section(s) specific to this representation:

CKW-1-S022 to CKW-1-S025

Other reports within stretch to which this representation also relates:

N/A

Representation in full

CKW-1-S022 to S025 is the path linking from Soap St at the eastern side of Millbay Docks, along the road known as Old Custom House Lane through Marina Village, passing seaward side of the RNLI building and a parcel of land along a path, yet to be built, through to Rusty Anchor. It is the optimal and intuitive path for the coast path and part of it was open to the public for many years prior to the area being transferred to the Millbay Marina Company for development. This path passes by the Plymouth RNLI base at S025. The RNLI have stated they

are keen for an improved footfall in this area and intend to make the base a visitor attraction in the anticipation of increased donations from visitors to the area.

[redacted] strongly supports the route CKW-1-S022 to CKW-1-S025 as the preferred route in this area. It is close to the waterfront with good views in places, in keeping with the aims of the English Coast Path. It will be easy to walk, particularly for individuals with mobility issues. It is also the preferred route for the SWCP and the Plymouth City Council Waterfront Walkway in this area. Both organisations intend to amend their current routes to align with the English Coast path route in this area once it is opened.

The alternative option CKW-1-A001, A002 and A003 includes around 30 steps from Millbay Docks (Soap St - up to West Hoe Road) at A001. This route will be used until building development in the area is completed. It is further away from the coast than the preferred route, will lack sea views and is unsuitable for those with mobility issues. It would be the only section of the coast path through Plymouth from Devils Point to the Barbican unsuitable for wheelchair access.

Natural England's comments

We welcome the positive engagement from [redacted] during the development of our proposals and their support for our proposed route sections CKW-1-S020 to CKW-1-S025.

We note the comments about the alternative route (route sections CKW-1-A001 to CKW-1-A003) and recognise that this route is unsuitable for those with mobility issues. Our proposals are for the alternative route to operate as a diversion from the ordinary route between CKW-1-S021 and CKW-1-S026 only until such time that development in the area is completed and the walkway through it can come into use as the line of the trail. The ordinary route, once established, will be suitable for those with mobility issues.

Relevant appended documents (see section 6):

6A - MCA/CKW1/R/6/CKW2871 - Photograph of the steps linking West Hoe Road to Soap St at the eastern side of Millbay Docks (CKW-1-A001)

Representation number:

MCA/CKW1/R/7/CKW2660

Organisation/ person making representation:

[redacted]

Route section(s) specific to this representation:

CKW-1-S022 to CKW-1-S025 and CKW-1-S031

Other reports within stretch to which this representation also relates:

N/A

Representation in full

Map CKW 1b section CKW-1-S022 to CKW-1-S025 We welcome this more coastal path which will give more seaward views of Millbay Docks etc. With reference to your text at paragraph 1.2.4, we hope that the location of the walkway does not change significantly. We hope that Plymouth City Council as the planning authority and highway authority ensures that the walkway comes into use as proposed and is publically maintained as a public footpath or public "street". Map CKW 1a and text at paragraph 1.2.17 and paragraph 1.3.3 (alternative routes etc.) We strongly suggest that where it is possible to walk the route or proposed route NOW then that is the route that should be adopted NOW., Specifically the alignment along Camber Road and around Eastern King Point and then via existing footways through Millbay docks (Ferryport) Any future development should then take account of the route of the ECP as already established.

Map CKW 1b section CKW-1- S031 and text at paragraph 1.2.12 We accept the use of the Barbican to Mount Batten Point ferry as the route of the ECP. As is stated, this ferry provides a continual daytime service throughout the year. We welcome and accept the continued “alternative” route along the Waterfront Walkway and expect Plymouth City Council to do everything necessary to keep this route useable and open to the public and as close to the waterfront as is possible.

Natural England’s comments

We welcome the positive engagement from [redacted] during the development of our proposals and their support for our proposed route at sections CKW-1-S020 to CKW-1-S025 and our proposals for the Plym Estuary.

We note the comments made by [redacted] regarding Camber Road. However, currently it is only possible to walk part way along Camber Road and there is no through route available. The area around Eastern King Point and Camber Road has been identified for mixed use development, the final nature, form and scale of which will be determined following the preparation of a masterplan and the subsequent planning process. Plymouth City Council have identified that future development should provide for a good quality pedestrian and cycling access route as close to the waterfront perimeter as practicable. If these plans are implemented Natural England will review its trail alignment and if appropriate, prepare a separate variation report to the Secretary of State to align the trail to this new more seaward walking and cycling route.

Relevant appended documents (see section 6):

N/A

Representation number:

MCA/CKW1/R/12/CKW2658

Organisation/ person making representation:

[redacted]

Route section(s) specific to this representation:

All route sections in CKW1; CKW-1-S007 & CKW-1-S008; CKW-1-S020 & CKW-1-S021; CKW-1-S022 to CKW-1-S025

Other reports within stretch to which this representation also relates:

N/A

Representation in full

See attached document.

Natural England’s comments

We thank [redacted] for their positive engagement during the development of our proposals and their support for our proposed route sections CKW-1-S007 to CKW-1-S008 (Telegraph Wharf and Freeman’s Wharf) and CKW-1-S020 to CKW-1-S021 (King’s Point Marina and Millbay Docks). We also welcome its confirmation that route sections CKW-1-S022 to CKW-1-S025 align with a number of important and interconnected strategic priorities for the city.

We note that [redacted] have made reference to the Devil’s Point steps within the Royal William Yard (the issue raised in [redacted]’s representation MCA/CKW1/R/11/CKW0008) and that they will work with the landowner to address the concerns raised but do not consider it a matter which should influence the route being proposed for the England Coast Path.

Relevant appended documents (see section 6):

6B - MCA/CKW1/R/12/CKW2658 - Report CKW 1 - [redacted] Representation

4. Summary of any similar or identical points within ‘other’ representations, and Natural England’s comments on them

Representations containing similar or identical points

Representation ID and organisation/ person making representation:

MCA/CKW1/R/1/CKW2873	[redacted]
MCA/CKW1/R/2/CKW2875	[redacted]
MCA/CKW1/R/3/CKW2876	[redacted]
MCA/CKW1/R/4/CKW2877	[redacted]
MCA/CKW1/R/5/CKW2878	[redacted]
MCA/CKW1/R/9/CKW2687	[redacted]

Name of site:

Millbay Docks

Report map reference:

CKW 1B

Route sections on or adjacent to the land:

CKW-1-S022 to CKW-1-S025

Other reports within stretch to which this representation also relates:

N/A

Summary of point:

[redacted]

Supports our proposals for route sections CKW-1-S022 to CKW-1-S025. Leads a local ‘Walking for Health’ group involving people with mental health issues. The group uses as much of the waterside route as is currently accessible and the proposals here would be a “real delight” for the group.

[redacted]

Supports our proposals for route sections CKW-1-S022 to CKW-1-S025 as the English Coast Path should, wherever possible follow the coast. The alternative option CKW-1-A001, A002 and A003 includes steps, lacks sea views and is unsuitable for those with mobility issues.

[redacted]

Supports our proposals for route sections CKW-1-S022 to CKW-1-S025. Active for All deliver weekly, inclusive walking sessions for adults with additional needs. It is a large group and walking along the narrow pavement of Great Western Road and then the main road of West Hoe Road, can feel a little dangerous. The proposals will mean a much safer and more accessible path for everyone.

[redacted]

Supports our proposals for route sections CKW-1-S022 to CKW-1-S025. Leads a group of walkers who walk to improve their mental and physical health, including adults with learning

disabilities, mental health issues, retired people and support workers. Our proposals would considerably enhance their walks (off a busy road) and will benefit walkers and visitors to Plymouth.

[redacted]

Supports our proposals for route sections CKW-1-S022 to CKW-1-S025 and the coastal path should have access through here (an historic site relating to the Titanic survivors coming ashore here).

[redacted]

Supports our proposals for route sections CKW-1-S022 to CKW-1-S025. The current route along West Hoe Road and Great Western Road is not an ideal walking environment and does not offer sea views to any extent. Planned redevelopment will make any such views even less likely. The proposal to re-position the route so that it is adjacent to the waterside will overcome these issues and is strongly supported. There needs to be strong enough measures in place to ensure that the route on CKW-1-S022 to CKW-1-S025 is delivered in due course, rather than using the existing route over sections CKW-1-A001 to CKW-1-A003.

Natural England's comment:

We welcome the positive engagement from these individuals and organisations (including Walking for Health groups and the South West Coast Path Association) and their support for our proposed route at sections CKW-1-S020 to CKW-1-S025.

Relevant appended documents (see Section 6):

N/A

5. Summary of 'other' representations making non-common points, and Natural England's comments on them

Representation ID:

MCA/CKW1/R/1/CKW2873

Organisation/ person making representation:

[redacted]

Name of site:

Stonehouse Peninsula

Report map reference:

CKW 1a

Route sections on or adjacent to the land:

Eastern Kings (Stonehouse Peninsula & Millbay Docks); CKW-1-A001 and CKW-1-S021 to CKW-1-S025

Other reports within stretch to which this representation also relates:

N/A

Summary of representation:

The proposed route, using the existing SWCP route, is the best option until such time that a route becomes available past the existing ferry port.

Natural England's comment:

We welcome the engagement and support from individuals for our proposals.

Relevant appended documents (see Section 6):

N/A

Representation ID:

MCA/CKW1/R/8/CKW2687

Organisation/ person making representation:

[redacted]

Name of site:

Cremyll Street

Report map reference:

CKW 1a

Route sections on or adjacent to the land:

CKW-1-S002 to CKW-1-S010

Other reports within stretch to which this representation also relates:

N/A

Summary of representation:

The Association supports this proposal to move the route to a waterside location off Cremyll Street. This makes the route more maritime and much improves the environment for walkers.

Natural England's comment:

We welcome the positive engagement from [redacted] during the development of our proposals and its support for our proposed route sections CKW-1-S002 to CKW-1-S010.

Relevant appended documents (see Section 6):

N/A

Representation ID:

MCA/CKW1/R/10/CKW2687

Organisation/ person making representation:

[redacted]

Name of site:

Plym Estuary

Report map reference:

CKW 1b

Route sections on or adjacent to the land:

Between route sections CKW-1-S031 and CKW-2-S001

Other reports within stretch to which this representation also relates:

N/A

Summary of representation:

[redacted] acknowledges our proposals to retain the route of the SWCP around the Plym Estuary and to use the Barbican-Mount Batten ferry for the ECP.

Natural England's comment:

We welcome the positive engagement from [redacted] during the development of our proposals.

Relevant appended documents (see Section 6):

N/A

Representation ID:

MCA/CKW1/R/11/CKW0008

Organisation/ person making representation:

[redacted]

Name of site:

N/A

Report map reference:

- Map CKW 1a Cremyll to East Quay
- Map CKW 1b East Quay to Mount Batten Point

Route sections on or adjacent to the land:

1. Report CKW 1: All route sections generally.
2. Map CKW 1a, route sections CKW-1-S012, and CKW-1-S014 junction with CKW-1-S015.



Other reports within stretch to which this representation also relates:

N/A

Summary of representation:

Comment 1

[redacted] has concerns where access furniture along the trail is not of a suitable standard for those who use all-terrain mobility vehicles and pushchairs. Natural England should ensure that any existing or new infrastructure does not present a barrier to their ability to progress along the Coast Path.

[redacted] requests that Natural England address with the necessary parties involved, the issue of existing man-made structures that are a barrier to those who use mobility vehicles; and ensure that all existing and proposed new structures along the Coast Path are suitable for those who use large mobility vehicles, changing infrastructure as needed, and complying with British Standard BS5709: 2018 Gaps Gates and Stiles.

Comment 2

Map CKW 1a, route sections CKW-1-S012 to CKW-1-S014

As well as being on the England Coast Path, the Royal William Yard area is also a destination. The staircase at the Royal William Yard (route section CKW-1-S012 joining CKW-1-S013) is recognised as a barrier to those with reduced mobility, but no reasonable adjustment has been made in the report to address this barrier.

Both users of mobility vehicles and families with pushchairs will find their way blocked when they come across the staircase. A reasonable adjustment would be for signage to be placed at either end of the staircase to indicate a step free diversion/route to reach the other end of the staircase.

This diversion may be achieved by using Admiralty Road to connect CKW-1-S010 to CKW-1-S014. The diversion must be free of obstacles, be suitable for large mobility vehicles, and should have dropped kerbs at appropriate places for pavement scooters and pushchairs. There are bollards beside the car park where CKW-1-S014 joins CKW-1-S015. It is likely to be necessary for at least one of these to be moved or removed to enable safe passage between the car park and the footway alongside Firestone Bay without having to go on the road. There should be a clear gap of 1.1m plus room to manoeuvre for large mobility vehicles and pushchairs.



[redacted] requests that Natural England:

- Place signage at either end of the staircase to indicate a step free diversion/route to reach the other end of the staircase.
- Make any necessary adjustments for dropped kerbs along the route of the diversion
- Reposition the bollards beside the car park where CKW-1-S014 joins CKW-1-S015 to enable safe passage between the car park and the footway alongside Firestone Bay.

Natural England's comment:

We welcome the positive engagement from [redacted]. After the publication of our proposals we had discussions with [redacted] who raised issues at a number of locations in relation to steps, gates (either being too narrow or only opening in one direction) and other artificial obstructions that make access by buggy, Trampler and other similar vehicles difficult if not

impossible. In some of our reports for the Cremyll to Kingswear stretch we have identified locations where we have agreed to replace or install new infrastructure to improve access. Where [redacted] have identified additional locations where they consider accessibility can be improved/modified (including those relating to the staircase and diversion at the Royal William Yard - section CKW-1-S012, and the bollards at section CKW-1-S014), we will discuss their suggestions with the access authority Plymouth City Council and the landowners. Should these suggestions be workable/appropriate, we would agree who would fund such work (whether it is the access authority or Natural England). A separate central government contribution is made annually to the South West Coast Path National Trail Partnership which is available to help with the costs of replacing infrastructure such as gates if the access authority agrees they are necessary.

Any changes to and improvements of furniture included in our reports do not inhibit use by mobility vehicles where the surrounding nature of the route makes this feasible; all new furniture will meet the British Standard 5709:2018 Gaps, Gates and Stiles.

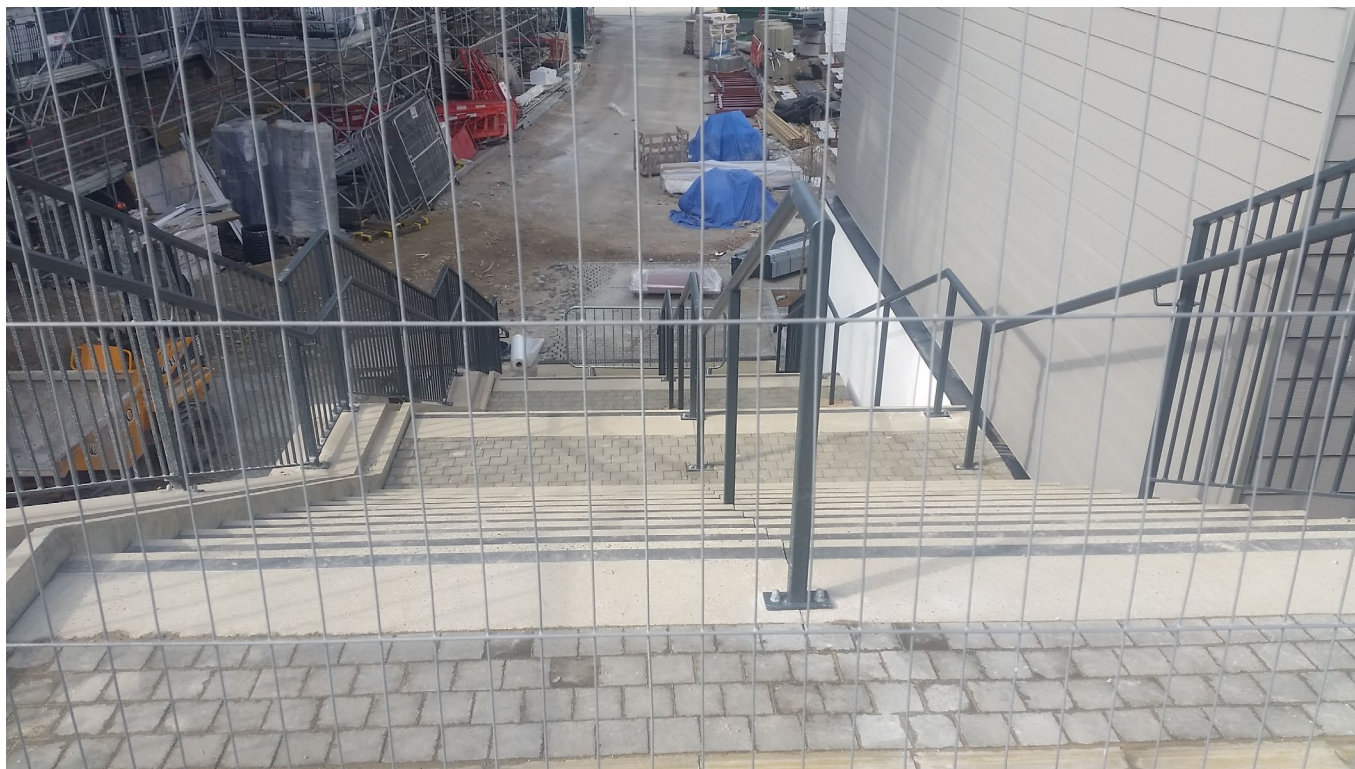
Because of current access restrictions (relating to lockdown restrictions and site visits), it may not be possible to agree specific new projects until the establishment phase of the process. We note that the City Council have made reference to concerns raised by [redacted] regarding the Devil's Point steps within the Royal William Yard in their representation MCA/CKW1/R/12/CKW2658, and that they will work with the landowner to address the concerns raised (but do not consider it a matter which should influence the route being proposed for the England Coast Path).

Relevant appended documents (see Section 6):

6C - MCA/CKW1/R/11/CKW0008 - [redacted] Notes on Infrastructure

6. Supporting documents

6A - **MCA/CKW1/R/6/CKW2871** - Photograph of the steps linking West Hoe Road to Soap St at the eastern side of Millbay Docks (CKW-1-A001). (To be open for public access in Spring 2020 when local building works are complete)



OFFICIAL

ENGLAND COAST PATH

Cremyll to Kingswear



Representation of Plymouth City Council in respect of

Report CKW 1: Cremyll to Mount Batten Point

England Coast Path Stretch: Cremyll to Kingswear

This representation is submitted by Plymouth City Council in response to the publication by Natural England of a series of linked reports setting out their proposals to improve public access to and along the stretch of coast between Cremyll and Kingswear.

We are pleased to see that the overwhelming majority of the proposed route aligns to the existing route of the South West Coast Path National Trail. We agree with this approach and are supportive of it. We were keen for the implementation of the England Coast Path to recognise that coastal access is important in Plymouth and that the South West Coast Path as it is currently walked and managed is an important recreational and utilitarian resource in the city. We are therefore pleased that the alignment of the proposed route was not led entirely by the route of the existing national trail and so provides the opportunity for improvements in coastal access to be realised.

The proposed route sets out three specific sections across the two reports where the proposed route differs from the existing route of the South West Coast Path:

- Cremyll Street (route sections CKW-I-S007 and CKW-I-S008);
- East Quay (route sections CKW-I-S020 and CKW-I-S021); and
- Trinity Pier and Millbay Marina Village (route sections CKW-I-S022 to CKW-I-S025)

We have also identified two locations within the area covered by this report which present opportunities for further improvements for public coastal access:

- Re-routing the South West Coast Path from Devils Point Park along Admiralty Street/Camber Road to land at Stonehouse Barracks
- Millbay Port and docks

Our representations on these specific sections are set out below.

Report CKW I Route Sections CKW-I-S007 and CKW-I-S008

The proposed route differs from the current route of the South West Coast Path by following a path to the seaward side of Telegraph Wharf and Freeman's Wharf. We consider this to be a positive change and one we are aware is already in informal use by the public. Engagement between Natural England and the adjacent residents appears to suggest their support. We have received comments from residents which suggests some misunderstanding surrounding the highway status of this section and the obligations Plymouth City Council subscribe to under *'The New Deal; Management of National Trails in England, 2013'*. However we do not feel such matters should interfere what is likely to be a positive change for all involved and as such we support this proposal.

Report CKW I Route Sections CKW-I-S020 and CKW-I-S021

The proposed route will move the South West Coast Path away from the Millbay Road/West Hoe Road junction and instead take the path onto the recently constructed route along the waterfront to the east of Kings Point Marina and the Millbay Docks. Whilst we are disappointed not to see the route running through Millybay Port (see below) we accept the rationale behind the proposed route being put forward and therefore offer our full support for the selected route. We agree the proposed route provides the public with a more attractive walking route away from the main road and with significantly improved views of the sea.

Report CKW I Route Sections CKW-I-S022 to CKW-I-S025

The proposed route between CKW-I-S022 – CKW-I-S025, along with route sections CKW-I-S020/21 aligns with a number of important and interconnected strategic priorities for the city. The proposal seeks to realign the current route of the South West Coast Path from the main road along Great Western Road instead following the newly constructed waterfront pedestrian route along East Quay, past Trinity and Millbay Piers and along Custom House Lane into the 'Rusty Anchor'. The realisation of this route within the Millbay Marina village relies upon the delivery of supportive development within this area and so a walkable interim position has been identified as indicated by route sections CKW-I-A001 to CKW-I-A003. The alternative route provides a significantly improved user experience and allows for the formal line of the England Coast Path to 'snap' onto its final position once development is completed without the need for utilisation of the formal variation process.

In relation to the proposals through Millbay Marina Village (route sections CWK-I-S022 – CKW-I-S025) Plymouth City Council adopts a neutral position. We ask Natural England to note the following statements of fact in relation to this site:-

- Previous planning permissions have incorporated a pedestrian walkway on the alignment proposed by Natural England, including extant permission 14/01103/FUL (which required public access along this route through its S106).
- Improved waterfront access is an aspiration of the Plymouth and South West Devon Joint Local Plan policy SO3(8), illustrated by Figure 4.2 which shows a 'Waterfront Walkway' aligning with the England Coast Path (ordinary route) proposal.
- Policy PLY29(2) also asks that development provides for 'high quality public realm with public access to and along the quayside walkways around the harbour'

Subject to the above the proposals put forward by Natural England in relation to the Millbay area are strongly supported by Plymouth City Council. The Plymouth and South West Devon Joint Local Plan Policies S03 and PLY29 set out this vision, describing a strategic plan to '*utilise the waterfront's assets, including its waterfront infrastructure, to drive economic growth in the area, and to capitalise on the potential of the waterfront to deliver a world class cultural and visitor offer*'. The area is an important international gateway in the city benefiting from major redevelopment and with existing planning permissions for a new sustainable mixed use neighbourhood the site is set to become a major waterfront destination in the city. With an existing international ferryport and ambitions for port reconfiguration to allow a cruise liner terminal strategic walking and cycling links to and from Millbay via the city centre and adjacent Hoe are vital. These proposals firmly support our vision for this part of the City and indeed delivery of that vision is already well underway. With a number of now occupied residential properties, an anticipated 2000 sqm of commercial floor space and the southern section of the Millbay boulevard already laid out this vision is fast becoming reality. The longer term aspiration for Millbay includes recognition of the role Clyde quay and Trinity Pier will have to play in providing an open-air waterfront platform for art exhibitions, marine events and flexible open-space cultural activity.

Future Opportunities

Plymouth City Councils ambition for increased access to and use of the waterfront are strongly supported by the proposal report put forward by Natural England. However we aspire towards wider development of additional opportunities not established under England Coast Path proposals.

Millbay Port and Docks Walking and Cycling Route: Plymouth City Council is working with the English Cities Fund, Associated British Ports and other key partners to deliver a new off-road walking and cycling route through the port. Whilst there is high level multi-organisational support for the scheme which is at an advanced stage it was unfortunate that the timetables for the two projects could not be aligned. We recognise Natural England's extensive efforts in exploring the potential for alignment and welcome the identification of the Millbay Port Walking and Cycling Scheme as a potential future variation of the new national trail.

Land at Stonehouse Barracks: Despite a mid to long term delivery trajectory it is highly encouraging to see recognition of the potential improvements to coastal access which might be possible through the development of Stonehouse Barracks which would create new coastal links from strategic coastal greenspace at Devils Point Park around the coast and linking in with the Millbay port walking and cycling link.

Other Matters

Devils Point Steps: We note the reference to Devils Point steps within the Royal William Yard and the additional correspondence with regard this matter. We are confident that we can work with the landowner to address this point and do not consider it a matter which should influence the route currently being proposed for the England Coast Path.

**Plymouth and south West Devon Joint Local Plan
Strategic Objective SO3**

SO3 - Delivering growth in Plymouth's City Centre and Waterfront Growth Area

The Plymouth and South West Devon Joint Local Plan is now at the public examination stage. Keep up to date with what's happening on our [Plymouth and South West Devon Joint Local Plan: Examination page](#).

To realise the potential of the City Centre and Waterfront Growth Area as a regionally significant growth hub through:

1. Establishing and reinforcing the City Centre's role as a regional centre for shopping, employment, leisure, a university centre, a strategic transport hub and a sustainable community in its own right.
2. Utilising the City Centre and waterfront's economic assets, including its waterfront infrastructure, to drive economic growth in the area.
3. Improving sustainable transport facilities and connections throughout the area, and particularly between the City Centre and the waterfront at Millbay, The Hoe and Sutton Harbour.
4. Protecting and making best use of the unique historic environment and landscape of the City Centre and waterfront, in particular Devonport waterfront, Royal William Yard and Devil's Point, The Hoe and The Barbican.
5. Capitalising on the potential of the City Centre and waterfront to deliver a world class cultural and visitor offer, with well connected destinations, high quality visitor accommodation, facilities to deliver major events and improved public realm and waterfront access.
6. Delivering new residential-led mixed-use developments that integrate successfully with existing communities and enhance community cohesion.
7. Improving city gateways, arrival points and key transport routes and delivering high quality architecture and urban design.
8. Delivering improved public access to and along the waterfront as well as enhancements to key public spaces and heritage assets.
9. Delivering water transport improvements and integration with other transport modes that will improve access to key locations including The Barbican Mount Batten, Sutton Harbour, Millbay, Royal William Yard, Devonport and Mount Edgcumbe.
10. Safeguarding and enhancing the environmental status of the Plymouth Sound and estuaries, including the European Marine Sites, and making the City Centre and waterfront communities more resilient to the effects of climate change.

**Plymouth and South West Devon Joint Local Plan
City Centre and Waterfront Growth Area Vision Diagram and
Key**

Key

	Green space		Landmark cultural use
	City Centre precinct		Cultural hub
	Univesity and cultural area		Marine employment
	The Hoe heritage and regeneration area		Housing
	Sutton Harbour heritage and regeneration area		Walking and cycling links
	Civic and cultural area		Strategic public realm improvements
	Key regeneration projects		High quality gateway
	Sports hub		Waterfront walkway
	Passenger ferry landing stage		Highway network
	Cruise terminal		Improved water transport links
	Mixed use		Improvements to strategic public transport corridor
	Hotel		Strategic green links
	Opportunity site		
	Heritage led regeneration/improvements		



VI 24 February 2020

Not protectively marked

**Plymouth and South West Devon Joint Local Plan
Policy PLY29 – Millbay Waterfront**

Policy PLY29

Millbay Waterfront

The Plymouth LPA supports the implementation of the existing planning permissions and strategic masterplan relating to the strategic development proposals for Millbay Waterfront. Development will create a new sustainable mixed use neighbourhood which meets the needs of the new community as well as acting as a major destination and attractive international gateway. The proposals provide for 742 new homes, including extra care homes, 12,500 sq.m. B1 offices, as well as small-scale retail, food and drink uses, leisure, hotel, marine related uses and facilities for marine and other events and a multi-storey car park. Any significant changes to the approved schemes will need to be supported by a revised strategic masterplan.

Development should provide for the following:

1. Delivery of a high quality boulevard link from the City Centre to Millbay's quayside, including strategic crossings across Bath Street and to the City Centre.
2. High quality public realm with public access to and along the quayside walkways around the harbour, including connections to the South West Coast Path and the National Cycle Network with new public access to West Hoe and the Stonehouse Peninsula, as well as major new open space for marine and other events.
3. High quality architecture, with tall buildings at appropriate positions such as the key corners and landmark locations, including an iconic building at Millbay pier.
4. Active uses at ground floor level.
5. Public leisure access to the water.
6. Safeguarding the operation of the adjacent working port.
7. Water taxi service from Clyde Quay.
8. Conserving and enhancing the setting of the listed RNLI building and Grand Parade at Millbay Marina.
9. Safeguarding marine-related uses and deep water berthing facilities.
10. Measures to ensure resistance and resilience to coastal flooding and improvement of surface water management, in accordance with the Local Flood Risk Management Strategy.



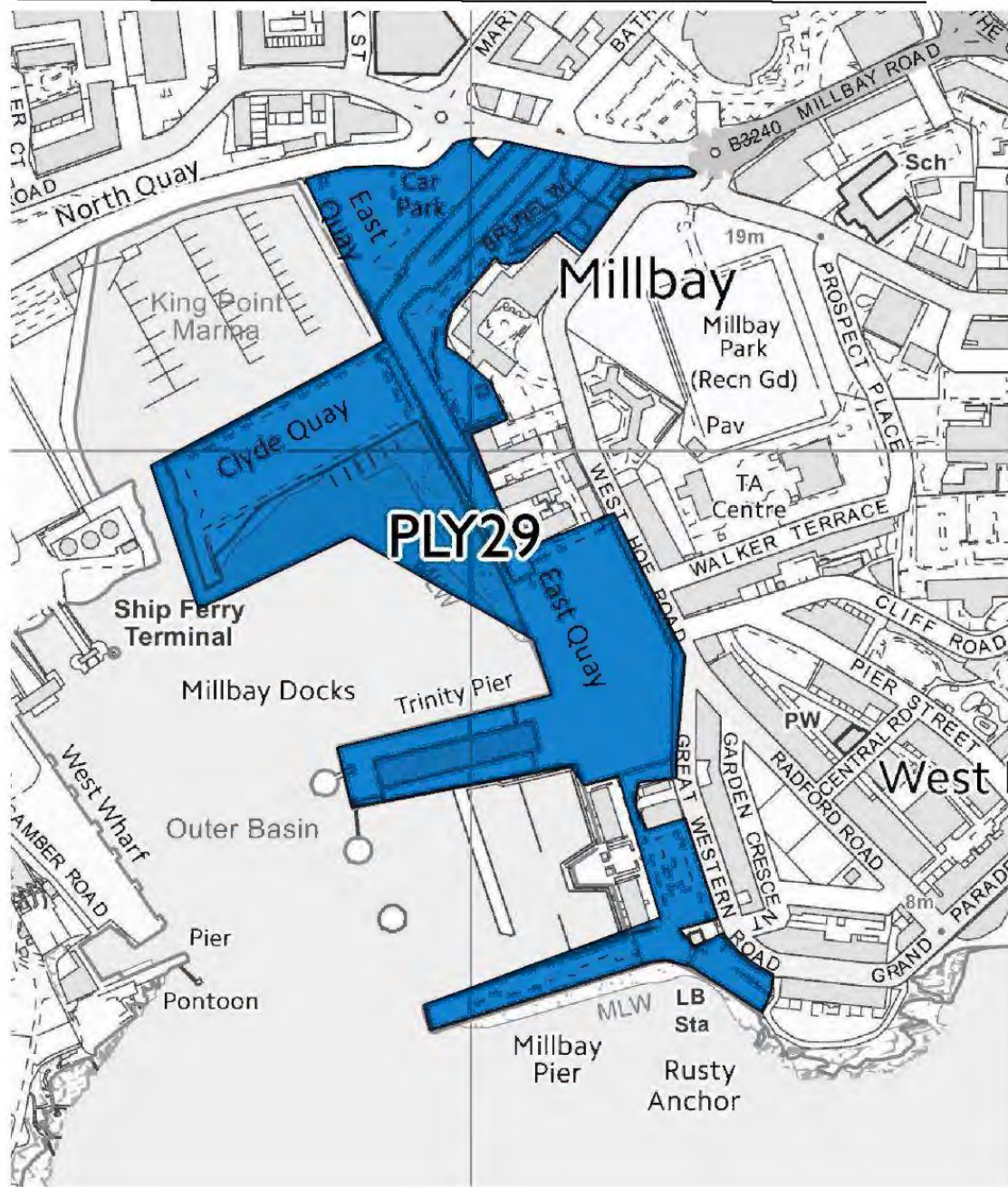
4.118 Millbay is a neighbourhood undergoing major regeneration. Over 400 homes, 2,000sqm of commercial floor space, a new marina and the landmark Plymouth School of Creative Arts have been delivered to date and a new community is starting to form. During this time a number of applications have been consented, including an outline application and more recently reserved matter applications for an Extra Care scheme and 137 residential units under planning reference 14/01448/OUT and 142 units at Millbay Marina under planning reference 14/01103/FUL.

4.119 The vision is for Millbay to become a major city destination – enhanced as Plymouth’s international ferryport and potential cruise liner terminal – as well as a vibrant, sustainable mixed-use neighbourhood. Proposals for a new hotel and more commercial uses are in the pipeline. It will be important that development supports the continued operation of the working port of Millbay.

4.120 The regeneration of the area has been driven by a partnership involving the Homes and Communities Agency, English Cities Fund and Plymouth City Council.

4.121 The regeneration of the Millbay area is a key part of the vision for the waterfront and is identified as such in the Plymouth Waterfront Strategic Masterplan (2016). This identifies the need to create stronger links between the City Centre and the waterfront and carries forward the Mackay Vision idea to create a new boulevard linking the two areas. The south section of the boulevard has already been laid out (with an interim finish) and this will need to be completed to a high quality final finish in the last phase of the development. The boulevard route is planned to extend along Bath Street to Union Street, flanked with substantial new development on both sides. A clear, direct and accessible route is key in the growth and regeneration of this area of the city.

4.122 The proposed boulevard will provide a major new pedestrian and cycle priority route connecting Millbay’s waterfront to the City Centre via Bath Street and providing strategic crossings, including at Millbay Road. Development fronting the boulevard will be expected to provide active ground floor frontages. Trinity Pier and Clyde Quay are identified in the Masterplan as important opportunities for open space for marine and cultural events, public-facing marine technology or arts space - potentially offering new flexible exhibition and studio space as a major new attraction - making Millbay more of a destination. Trinity Pier has an important deep water berth and access to this should be safeguarded for marine-related use.



DISABLED RAMBLERS NOTES ON INFRASTRUCTURE

Useful figures

- **Mobility Vehicles**
 - **Legal Maximum Width of Category 3 mobility vehicles: 85cm** Same width is needed all the way up to pass through any kind of barrier to allow for handlebars, armrests and other bodywork.
 - **Length:** Mobility vehicles vary in length, but **173cm is a guide minimum length.**
- **Gaps** should be 1.1 minimum width on a footpath (BS5709:2018)
- **Pedestrian gates** The minimum clear width should be 1.1m (BS5709:2018)
- **Manoeuvring space** One-way opening gates need more manoeuvring space than two-way opening ones and some mobility vehicles may need a three metre diameter space.
- **The ground** before, through and after any gap or barrier must be flat otherwise the resulting tilt effectively reduces the width

Infrastructure

Infrastructure on the route of the England Coast Path should be assessed by Natural England for suitability for those with limited mobility, and particularly for those riding large or all-terrain mobility vehicles. The assumption should always be that these individuals will be alone, and will need to stay sitting on their mobility vehicle, ie they will not be accompanied by someone who could open a gate and hold it open for them. The principle of the least restrictive option should always be applied.

- **New infrastructure**

New infrastructure should comply with Bristol Standard with BS 5709: 2018 Gaps, Gates and Stiles.
- **Existing infrastructure**

The creation of the England Coast Path provides a perfect opportunity to improve the trail to make it as accessible as possible. Unsuitable existing infrastructure could be removed now and, where necessary, replaced with new, appropriate infrastructure in line with BS 5709: 2018 Gaps, Gates and Stiles.

Gaps

A Gap is always the preferred solution for access, and the least restrictive option (BS 5709:2018). The minimum clear width of gaps on footpaths should be 1.1metres (BS 5709:2018).

Bollards

On a footpath, these should be placed to allow a minimum gap of 1.1metres through which large mobility vehicles can pass.

Pedestrian gates A two-way, self-closing gate closing gate with trombone handle and Centrewire EASY LATCH is the easiest to use – if well maintained, and if a simple gap is unacceptable. Yellow handles and EASY LATCH allow greater visibility and assist those with impaired sight too. <https://centrewire.com/products/easy-latch-for-2-way-gate/> One-way opening gates need more manoeuvring space than two-way and some mobility vehicles may need a three metre diameter space to manoeuvre around a one-way gate. The minimum clear width of pedestrian gates should be 1.1metres (BS 5709:2018).

Field gates

Field gates (sometimes used across roads) are too large and heavy for those with limited mobility to use, so should always be paired with an alternative such as a gap, or pedestrian gate. However if this is not possible, a York 2 in 1 Gate <https://centrewire.com/products/york-2-in-1/> could be an alternative, with a self-closing, two-way opening and yellow handles and EASY LATCH.

Bristol gates

(Step-over metal gate within a larger gate.) These are a barrier to mobility vehicles, as well as to pushchairs, so should be replaced with an appropriate structure. If space is limited, and a pedestrian gate not possible, a York 2 in 1 Gate <https://centrewire.com/products/york-2-in-1/> could be an alternative, with a self-closing, two way opening, and yellow handle and EASY LATCH for the public access part of the gate.

Kissing gates

A two-way, self-closing gate is hugely preferable to a kissing gate, but in certain situations a kissing gate might be needed. Many kissing gates can be used by smaller pushchairs and small wheelchairs, but are impassable by mobility scooters and other mobility vehicles. Unless an existing kissing gate has been specifically designed for access by large mobility vehicles, it should be replaced, if possible with a suitable gate (see above). If a kissing gate really must be used, Disabled Ramblers recommend the [Centrewire Woodstock Large Mobility](#) kissing gate, fitted with a RADAR lock, which can be used by those riding mobility vehicles. NB this is the only type kissing gate that is large enough to be used by all-terrain and large mobility vehicles.

Note about RADAR locks on Kissing gates

Often mobility vehicle riders find RADAR locks difficult to use, so they should only be used if there is not a suitable alternative arrangement. Here are some of the reasons why:

- Rider cannot get off mobility vehicle to reach the lock
- Rider cannot reach lock from mobility vehicle (poor balance, lack of core strength etc)
- Position of lock is in a corner so mobility vehicle cannot come alongside lock to reach it, even at an angle
- RADAR lock has not been well maintained and no longer works properly.
- Not all disabled people realise that a RADAR key will open the lock, and don't know how these kissing gates work. There must be an appropriate, informative, label beside the lock.

Board walks, Footbridges, Quad bike bridges

All of these structures should be designed to be appropriate for use by large mobility vehicles, be sufficiently wide and strong, and have toe boards (a deck level edge rail) as edge protection. On longer board walks there may also be a need to provide periodic passing places.

Sleeper bridges

Sleeper bridges are very often 3 sleepers wide, but they need to be at least 4 sleepers wide to allow for use by mobility vehicles.

Steps

Whenever possible, step free routes should be available to users of mobility vehicles. Existing steps could be replaced, or supplemented at the side, by a slope or ramp. Where this is not possible, an alternative route should be provided. Sometimes this might necessitate a short diversion, regaining the main route a little further on, and this diversion should be signed.

Cycle chicanes and staggered barriers

Cycle chicanes are, in most instances, impassable by mobility vehicles, in which case they should be replaced with an appropriate structure. Other forms of staggered barriers, such as those used to slow people down before a road, are very often equally impassable, especially for large mobility vehicles.

Undefined barriers, Motorcycle barriers, A frames, K barriers etc.

Motorcycle barriers are to be avoided. Often they form an intimidating, narrow gap. Frequently put in place to restrict the illegal access of motorcycle users, they should only ever be used after very careful consideration of the measured extent of the motorcycle problem, and after all other solutions have been considered. In some areas existing motorcycle barriers are no longer necessary as there is no longer a motorcycle problem: in these cases the barriers should be removed.

If no alternative is possible, the gap in the barrier should be adjusted to allow riders of large mobility vehicles to pass through. Mobility vehicles can legally be up to 85 cm wide so the gap should be at least this; and the same width should be allowed all the way up from the ground to enable room for handle bars, arm rests and other bodywork. The ground beneath should be level otherwise a greater width is needed. K barriers are often less intimidating and allow for various options to be chosen, such as a shallow squeeze plate which is positioned higher off the ground. <http://www.kbarriers.co.uk/>

Stepping stones

Stepping stones are a barrier to users of mobility vehicles, walkers who are less agile, and families with pushchairs. They should be replaced with a suitable alternative such as a footbridge (which, if not flush with the ground should have appropriate slopes at either end, not steps). If there are good reasons to retain the stepping stones, such as historic reasons, a suitable alternative should be provided nearby, in addition to the stepping stones.

Stiles

Stiles are a barrier to mobility vehicles, walkers who are less agile, and families with pushchairs. They should be replaced with suitable alternative infrastructure. If there are good reasons to retain the stile, such as historic reasons, an alternative to the stile, such as a pedestrian gate, should be provided nearby in addition to the stile.

Urban areas and Kerbs

In urban areas people with reduced mobility may well be using pavement scooters which have low ground clearance. Where the trail follows a footway (eg pavement) it should be sufficiently wide for large mobility vehicles, and free of obstructions. The provision and correct positioning of dropped kerbs at suitable places along the footway is essential. Every time the trail passes over a kerb, a dropped kerb should be provided.

Disabled Ramblers March 2020