

## **Plymouth City Council Local Development Framework – City Centre and University Area Action Plan Public Examination**

### **Statement of Common Ground between Plymouth City Council and English Heritage.**

1. This Statement of Common Ground has been prepared jointly by Plymouth City Council and English Heritage. It sets out the areas of agreement between the above two organisations and has been produced to aid the Inspector in his consideration of the AAP.
2. Plymouth City Council believes that the City Centre and University Area Action Plan is sound as submitted. Any improvements set out in this Statement are clarifications to the approach set out in the AAP, and have been agreed to ensure that the AAP accurately reflects the Council's intentions. It is hoped that by setting out improvements, Plymouth City Council and English Heritage are assisting the Inspector to find ways to recommend improvements to the AAP to make it a better and more usable document.

### **Context**

3. Plymouth City Council has conducted a number of consultations during the process of producing the AAP, and at each stage has sought the views of English Heritage. As set out in Council Statement 03, the Council believes that the comments made by English Heritage have been helpful and have assisted it in creating a balanced and sound AAP. It has been in discussions with English Heritage since August 2009 to explain the approach set out in the AAP, and this dialogue has continued throughout the course of the Public Examination so far. Discussions have allowed both organisations to understand the each other's concerns and objectives, and to:
  - Set out the areas of agreement,
  - Develop some improvements to the AAP which will provide English Heritage with the confidence that its concerns will be addressed.

### **Areas of Agreement**

4. English Heritage set out in their representation to the Pre-Submission draft AAP, that they recognise that the City Council has taken on board many of their comments made at previous consultations.

### **Agreed Improvements to the AAP**

5. Discussions are ongoing between English Heritage and the City Council, with the aim of ensuring that the AAP, and the Council's overall approach to change in the City Centre pays full regard to the heritage and townscape of the City Centre. As a result of these discussions, the City Council and English Heritage have agreed a number of changes to the AAP to ensure that the Council's approach is clearly set out.
6. These changes expand upon principles which the Council had already set out in the AAP, but which upon reflection, it felt could be clarified. In particular, the documents and strategies which the Council intends to produce following adoption of the AAP

could usefully be set out, along with timescales for their production, a description of what they will contain and an indication of their status. Since these clarifications expand upon principles already set out in paragraph 12.6 of the AAP, the Council believes they can be made to the AAP as improvements and clarifications. The Council does not believe that the AAP without these changes is unsound.

7. The changes are set out in Council Statement 03, and duplicated below.
8. English Heritage believe that the changes now proposed give them sufficient confidence in the Council's approach, that many of their concerns as set out in their representations to the Pre-Submission draft AAP and their Statements for the AAP hearings have been satisfied. They are therefore happy to confirm that if the Inspector feels it is appropriate to recommend that these changes are made to the AAP, that their reservations regarding the AAP will have been removed.

Improvements to the AAP

9. The following improvements to the AAP were set out in Council Statement 03:

**“New paragraphs to be inserted following paragraph 3.15 of the AAP, after the title (old paragraph 3.16 retained and used after the added section)**

#### **How Will the AAP Deliver This Vision?**

3.16 An Area Action Plan is part of a Local Development Framework, providing the planning framework for areas where significant change is needed by identifying the distribution of uses and their inter-relationships, including specific site allocations, and set out as far as practicable the timetable for the implementation of the proposals.. It is essentially, however, a strategic plan. While it contains more detail and site specific policy than a Core Strategy, it should not contain an inappropriate level of detail and stray into the masterplanning of individual sites. Evolving the detail is something which should be undertaken as part of the process of developing and delivering individual proposals, based on the guiding principles set out in the AAP.

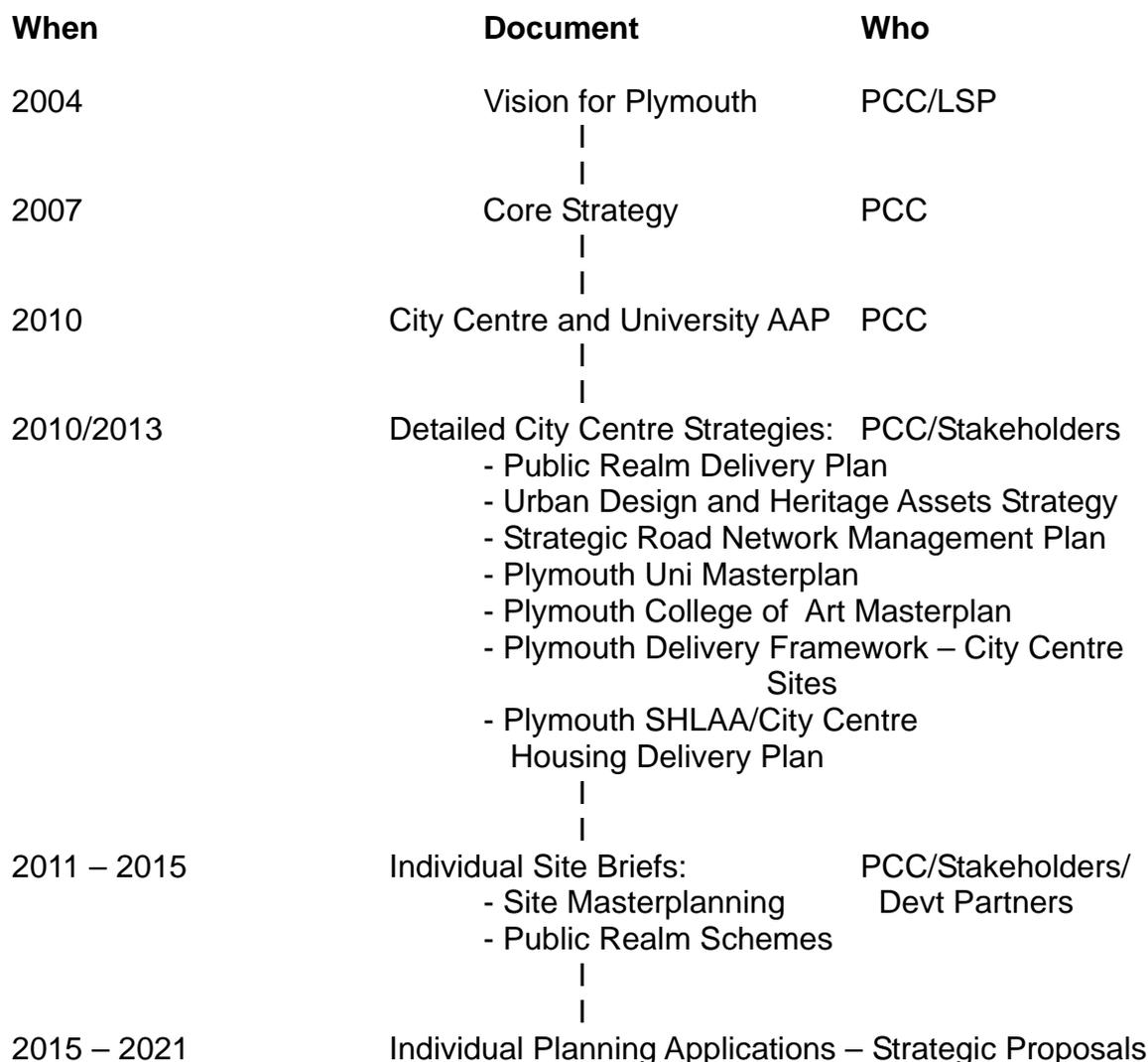
3.17 The City Centre and University Area Action Plan is clearly a key part of the Plymouth Local Development Framework. It sets a vision and a framework to deliver the Core Strategy aspiration of a renewed City Centre by 2026. It does this by setting out strategic objectives, policies and proposals which should be used as guidance for all development which will contribute to the renewed City Centre. It is not, however, a ‘Blue Print’ for development, but rather guidance to show how the Council wants to see its objectives implemented. The AAP should be seen as one stage in a sequence of plans and strategies which will lead from the Vision for Plymouth through the Core Strategy and AAP to the delivery of fully realised developments. Once the AAP stage has been put in place, a number of more detailed delivery plans will be developed to amplify key aspects of the Council's vision for the City Centre. This AAP must be seen in this context, of being one step along the path to delivery.

3.18 This approach means that the AAP is a practical, manageable and flexible document. It sets the parameters for later masterplanning exercises, site briefs and delivery plans to use, and ensures that development proposals which may not come to implementation until the end of the plan period are not shackled by inappropriate levels of detail at too early a stage. At the same time, it puts in place policies and principles at an appropriate level of

detail to ensure that key objectives are flagged up as important at an early stage and will be used to shape the development process. For example, the AAP is clear that place making is a key consideration for any City Centre developments, and that the City Centre's heritage and quality of buildings and public realm will be important considerations throughout the development process.

3.19 The next layer of detailed guidance, that will come after the AAP is adopted, will expand on these themes and provide more detailed information and advice relating to how proposals should be developed. Individual site briefs and delivery plans will be prepared as a further layer of detail, setting out detailed masterplanning principles for individual development opportunities. All of these must comply with the principles set out in the AAP.

3.20 These principles can be understood using a diagram:



3.21 In accordance with these principles, the AAP therefore sets out policies and proposals in the following way: (As existing paragraph 3.16)

**Alterations to Chapter 12: Delivery, paragraph 12.7**

12.7 The City Centre and University AAP therefore occupies one layer in the sequence of guidance which the City Council will use to deliver change in the City Centre. This

approach is set out in detail in Chapter 3 of the AAP.

12.8 The Council will produce further guidance and strategies, and give them appropriate status, in accordance with the following schedule:

Public Realm Delivery Plan		
2010-2013	This will be a Plymouth City Council document which will build on the provisions in Policy CC03 of the AAP. It will set out detailed principles for the design of public realm improvements throughout the City Centre, and set out detailed schemes for key places such as Armada Way, Old Town Street and Royal Parade. It will also set out costed schemes for these parts of the public realm so that projects can be undertaken as funds become available.	PCC Plan developed with input from key stakeholders. Could be SPD.
City Centre Urban Design and Heritage Assets Strategy		
2010-2013	<p>This will be a Plymouth City Council document which will resolve 2 issues:</p> <p>Firstly it will bring together existing work (already present in the AAP evidence base) to present a thorough analysis of the quality of urban design and the value of heritage assets (Identifying those non listed buildings it is proposed to keep and those listed buildings it wishes to be renovated) in the City Centre, within the framework and context set by the AAP. To this end it will express how the regeneration of the centre through the issues of retail, office, housing, movement/transport and public realm will be progressed and integrated in the context of the historic environment.</p> <p>Secondly it will present a set of guidelines through the use of design coding for future development to respect which will demonstrate how the objectives of the AAP can be implemented in a way which uses the most suitable urban design principles and conserves, enhances and uses the City Centre's heritage to create a unique and distinctive place.</p> <p>It may therefore be appropriate to adopt this strategy as an SPD.</p>	PCC Strategy, could be SPD.
Strategic Road Network Management Plan.		
2010-2013	This will be a document prepared by the City Council's Transport Strategy team and will have strong links to both the LDF and LTP3. It will also have a strong relationship to the City Centre Urban Design and Heritage Assets Strategy, so that the importance of links across the road, of key nodes along the road network, and of the quality of the environment along the road network can be examined. The Strategy should include guidelines and principles to be used as improvements to the strategic road network are made, either as part of transport lead projects or development proposals in	PCC Strategy adopted under the LTP3 (with involvement from key stakeholders)

	the AAP.	
Plymouth Delivery Framework – City Centre Sites		
2010/2013	The Plymouth Delivery Framework is the name given to the City Council's system for understanding and influencing the delivery of the projects which are key to the delivery of the City growth agenda. This part of the Framework will examine the City Centre strategic proposals and the relationship with key pieces of infrastructure, using information already set out in the AAP evidence base.	Plymouth City Council internal document prepared with input from key stakeholders.
Plymouth SHLAA/City Centre Housing Delivery Plan		
2010-2013	The Plymouth SHLAA was published in early 2010. Although not specifically a part of the evidence base of the AAP, it does have a bearing on the delivery of City Centre sites. As part of the future rolling annual update of the SHLAA, attention will be focused on City Centre sites so that the Council can influence and respond to City Centre proposals which could include an element of housing.	Plymouth City Council document with input from SHLAA panel and PCC Housing Department.
University of Plymouth Masterplan/Plymouth College of Art Masterplan.		
2009/2010	These documents already exist and are part of the AAP evidence base. They set out in detail the masterplanning principles and proposals for the University and the College of Art. As part of the suite of documents which set out how the City Centre will change, they should be read as guidance as to how the City Council and its partners will apply the policies in the AAP. The City Council will explore whether it would be appropriate for these documents, or versions of them to be adopted as SPD.	UoP/PCA/PC C documents, could possibly be adopted as SPDs.
City Centre Site Briefs		
2011-2015	These documents will be prepared under the Core Strategy, AAP and the above strategy documents to set out how individual City Centre schemes should be implemented. They should include all possible elements of a scheme which should be commented on, including design, relationship to the City Centre and historic environment, elements of housing and potential affordable housing and scheme viability. It is anticipated that they would be prepared in partnership with a developer, who may be the Council's formal development partner for relevant schemes.	PCC/future development partner documents. Adopted as SPD?
Public Realm Scheme Masterplans.		
2011-2015	These documents will be the detailed plans for public realm works, building on the schemes set out in the Public Realm Strategy. They will therefore be the final vehicle leading to implementation and will be prepared once funding for schemes has been secured, either through Council capital funding or by public realm works being undertaken as part of a development proposal. It may be appropriate for these masterplans to be adopted as SPD.	PCC documents prepared with input from development partners and key stakeholders.

		May be appropriate to adopt as SPD.

**Changes resulting from discussions with English Heritage which the Council is happy to accept:**

- 1 Policy CC03, Bullet point 10, replace with the following:

“Explore ways to provide cover over the main shopping streets *that is consistent with the character of the City Centre* and incorporate (as existing policy)”

This Policy bullet point will need to be amplified in the supporting text by explaining that the way this should be achieved is explained in the supporting Adopted Design Guide SPD and evolving Development Guidelines SPD

- 2 Deletion of elements of paragraph 8.9

~~“8.9 The final design, form and mix of uses will be evolved over the plan period. It is anticipated that the lead in time for a scheme of this size will be at least 10 years. During that time the City Council will be considering the most appropriate delivery mechanism, given that it owns the freehold of the site. As the delivery mechanism is implemented, the proposal site is flexible enough for the final scheme to be designed to meet the needs of the City Centre, retailers and other occupiers at that time. The proposal in this AAP sets out the minimum requirements which must be delivered on this site to enable the aims of the AAP and of the City Growth Strategy to be met.”~~

Deletion of elements of 12.6

~~“12.6 The approach taken in this AAP is to set out the Council's aspirations for change in the City Centre, to set out the broad strategic approach which should be followed over the plan period, and to 'point a finger' at the sites which will be key in delivering the change. It has done this by developing a comprehensive understanding of the factors which will influence how and when development can be delivered in the City Centre. The AAP does not set out to create a detailed design framework or masterplan for change in the City Centre. This is because the detailed planning and design of individual schemes needs to respond to the needs of retailers and investors at the time of delivery, and needs to be able to take advantage of the latest thinking about City Centre developments and sustainability. Since some of the developments are unlikely to be implemented for at least 10 years, the AAP needs to set out a flexible approach to each site, which does not prescribe the detailed form of development, and which allows the detail to evolve as the delivery process goes on.”~~

**Further Changes Agreed with English Heritage**

10. Finally, the City Council and English Heritage have recently agreed two further improvements to the AAP:

Amend paragraph 8.7 bullet point 4 to read:

“The potential to create a 2 level shopping street will be examined through the Urban Design and Heritage Assets Strategy. Any potential to create upper level links into Drakes Circus and the new anchor store across Armada Way must be investigated carefully and rigorously to ensure that the integrity of the Abercrombie Plan and grid of streets is not compromised.”

Add the following text to the end of the second paragraph of the description of the Urban Design and Heritage Assets Management Strategy in the above table (beginning “Secondly...”), to be inserted into Chapter 12 of the AAP:

“This will include guidance on tall buildings in the City Centre.”

## **Conclusions**

11. On the basis of the improvements which have been set out in this Statement of Common Ground, and which have been agreed through a series of discussions between English Heritage and Plymouth City Council, English Heritage can confirm that their concerns regarding the City Centre and University AAP have been satisfied.