

**Respondent English Heritage
Matter 2 Justified****Plymouth City Centre AAP EiP****Matter 2 Justified - Does the AAP justify its encouragement for more intensive development in relation to the impact on townscape and heritage assets? How will more intensive development affect the key attributes of the Abercrombie Plan and the existing City Centre?**

A number of documents in the evidence base lack rigour, and as a consequence the AAP cannot be justified, as it is not based on a robust and credible evidence base.

The Sustainability Appraisal (SA) fails to assess the impacts of the plan as a whole. The SA appears to contain no assessment of secondary, synergistic or cumulative impacts on the historic environment of the plans proposals, as required by Article 3 (5) and Annex II of Directive 2001/42EC on the Assessment of the Effects of certain Plans and Programmes on the Environment (the SEA Directive).

The plan proposes a number of landmark or tall buildings. The AAP does not provide an effective plan-led approach to tall buildings as it has potentially (the uncertainty is in itself a concern) identified inappropriate locations for tall buildings (Para 2.4 English Heritage and CABE *Guidance on Tall Buildings*, 2007).

The justification for these landmark structures is within the Design SPD which forms part of the evidence base. However, it is unclear about what work has been undertaken to support its conclusions. There appears to be a lack of the analysis necessary to determine the impacts upon specific listed buildings and / or the Abercrombie Plan form, that leads to the identification of the areas that are "Zones of opportunity for tall buildings".

The Design SPD then outlines the approach that will need to be undertaken by applicants to justify any development. This however presupposes that the location is appropriate. This assumption will only lead to a lack of clarity and could potentially affect deliverability and the effectiveness of the plan should these sites be contested at the planning application stage. 3D modelling and visualisations illustrating the impacts must be properly undertaken, and assessed, before the plan is adopted.

This is equally applicable to the Matter's second question: the affect of the possible intensification of development, to accommodate 100,000 sqm of office

space and 100,000 sqm of retail space; most likely through an increase in building heights and / or larger floor plates, resulting in an increase in the mass and bulk of development proposals. English Heritage is unsure how the intensification of development will affect the key attributes of the Abercrombie Plan.

Again, there is an absence of appropriate assessments, for example, 3D modelling or visualisations of the proposed retail, office, and housing figures. This means any impacts are unknown and not justified.

The AAP identifies sites and or specific buildings which it refers to for either renovation, alteration or possible redevelopment at Policy Proposals CC8, CC9, CC11, CC14, (9.10) CC18. Of those buildings identified in the Evidence Base (The Gould Report, Baxter's Characterisation Study), how have these documents been used to inform the development options?

There appears little use of this evidence base to identify which of the nationally listed and locally important buildings are proposed to be retained and renovated and those that that the AAP seeks to demolish. The AAP should be clearer in using the Evidence Base and express this in the form of maps and visual aids, indicating the buildings of local importance that Plymouth intends to retain and those sites that it is acceptable to redevelop.

We remain disappointed and concerned that the City Centre is not provided with conservation area status. Were the City to include it within their plans and aspirations for the centre, it might provide English Heritage with the confidence that the proposals would not unduly undermine such a locally distinctive, historic asset. We, therefore, remain unconvinced that the proposals and policies that are proposed will preserve or enhance the defining locally distinctive characteristics of Plymouth.

This is compounded by the plan's internally inconsistent and contradictory messages. On the one hand the plan places some positive weight on the historic environment; for example, at *Chapter 2, Context and History*, Paragraph 2.21 and in particular *Strategic Objective 2 Place making* along with a fuller explanation at *Chapter 5: Place making in the City Centre*. However, the positive characteristics attributed to the historic environment is offset, and potentially undermined, by Paragraphs 8.9 and 12.6 which propose a *laissez-faire* approach to design, bulk and mass of any proposals.

If the City wishes to retain sufficient flexibility in its development agenda this must cut both ways. It cannot, in the absence of a robust and informed (ie evidence based) rationale, promote a type or level of development because it believes this is what the development sector seeks, rather than what the city requires and the site(s) can stand. English Heritage has expressed concern over the AAP because as it is currently configured we cannot predict what the city centre will

look like in 15 years. The issue is surely that neither can the Council, so how will they know now whether their AAP is fit for purpose in its ability to deliver the regeneration and sustainable growth agenda they aspire to. The City within the AAP draws attention to the subsequent programme of policy / document formulation which will help inform or finesse the AAP but by then the key objectives of the AAP will be in place and it will be easy to dismiss such things as the public realm or heritage strategies if they are seen to “obstruct” the AAP or to “skew” their formulation so they fit.

This contradiction will not lead to an effective delivery and lacks clarity as to how the key policy objectives will be achieved. The AAP seeks to deliver a considerable agenda for growth and intensification over the 20 year period. With the lack of a conservation area status, and the surety that would provide, there is a management/policy deficit necessary to ensure the protection of the historic environment, in this case the Abercrombie Plan form, locally distinctive townscape qualities, and buildings of merit.

The AAP cannot be said to be justified or effective and is therefore unsound.

English Heritage recommends the following changes to the AAP:

Whilst these proposed changes do not, we believe, make the Plan Sound they would start to clarify some of the points raised above.

Deletion of elements of 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."~~

Amendment of the Urban Design Appraisal to include the appropriate elements of a tall buildings study as outlined in Paragraph 2.7 of *Guidance on Tall Buildings* (EH/CABE. July 2007);