

## **Respondent English Heritage Matter 3 Effectiveness**

### **Plymouth City Centre AAP**

#### **Matter 3 Effectiveness - Does the AAP contain sufficient guidance on what improvements to the public realm and circulation areas are expected?**

The AAP cannot be said to be effective to the proposed improvement of the public realm as it lacks clarity and does not provide certainty due to its contradictory messages. As a consequence English Heritage is unsure about what is proposed for the public realm.

The broad framework of aspirations for the city centre whilst fine, are as non-specific as they need to be to allow for the flexibility and ever changing market circumstances which the Council wishes to accommodate. This they propose can be complemented by a regime of SPDs on urban design, site briefs, heritage, public realm etc which provides the more detailed criteria by which the actual implementation of the AAP will take place.

The difficulty is that this does not provide any sense of clear direction or guarantee at the outset a process for putting in train the quantum of development, of a set composition in given locations and of particular physical form, which will result by the end of the plan period or whose progress against a predetermined target (using performance indicators) can be monitored over time. Alternatively, the Council can produce a masterplan which provides all of that, with criteria which might identify where and in what circumstances exceptions, to given tolerances, might apply, but this will not provide the degree of market-dictated flexibility they seek. In short the City cannot have it both ways and is a contradiction in not only the level of detail provided but also in achieving the Plans Objective.

For example, Paragraph 2.20 raises the issue of “poor protection from the weather” and again at Policy CC3 Criterion 10 seeks as an aim of public realm improvement to “incorporate protection from the weather”. Whilst these are laudable aims we are unsure what this means in practice and what the Councils aspirations are; is it a fully covered controlled environment, or the current solid concrete canopies between ground and first floors. The latter is a locally distinctive feature that is typical of the detailing within Plymouth City centre, and should be retained, re-introduced. Indeed the emerging Development Guidelines SPD recognises this at Section 4.4 (*City Centre shop fronts planning guidance*), furthermore it encourages the use of this distinctive feature at this height where appropriate.

This doubt over the City’s intentions is compounded by the Issues and Option paper that closed for consultation in December 2008 and clearly sought to cover

significant sections of the external public realm of the Abercrombie Plan form and used, amongst others, Bristol Cabot Circus as an example. The nature of the Abercrombie Plan form is in many ways characterised by the long open and uninterrupted vistas, down any number of the streets, some of which are concluded by key buildings or monuments. The full covering of these streets would be harmful and inappropriate to the character of the Abercrombie Plan.

Therefore, between the City Centre Area Action Plan and the Development Guidelines SPD there is the potential for a contradiction in policy and guidance.

The combination of these two policy aims, in addition with the City Centre AAP statements at Paragraphs 12.6, which propose "...the detailed planning and design of individual schemes needs to respond to the needs of retailers and investors at the time of delivery...", and its essence repeated at 8.9, which it to say a more laissez-faire approach to proposals, means there is uncertainty of what is proposed. The policy statement will potentially compromise the Council's aspirations of ensuring that all shop-fronts (and signage) within the city centre are of sufficiently high quality, as well as compromising their ability to promote locally distinctive designs which respond to the unified and coherent qualities inherent in the buildings of the Abercrombie Plan.

Contrastingly, at Paragraph 8.7 a high degree of detail is being proposed. Bullet point 4 refers to two-level shopping street with high level links. What is the desirability or rationale for this and what is its impact upon the Abercrombie townscape? Whilst there appears to be no justification for this proposal and this policy should be deleted, the wider issue is that there are inconsistencies in the level of detail the document aspires to and the other supporting policy documents aims.

Attention in this statement is focused on canopies and weather protection, and the inconsistencies in policies, which is rather narrow in its scope. We acknowledge that Plymouth are proposing to put in place a more comprehensive public realm (embracing landscape and circulation / use issues) strategy. We would hope that this is informed by an understanding of the historic significance of the Abercrombie Estate but also takes account of functional performance and contemporary considerations. However, in the absence of such a contextual framework it is certainly reasonable to assert that it would be premature to consider individual proposals (ie detailed proposals for high level walkways or covering streets) in isolation as they could not be suitably informed. Such detailed policy proposals are therefore inappropriate and not based on the evidence.

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.

The plan and would not be effective as the Plan as sited by this example is unsure if it is a detailed or strategic document moreover, its policies internally are not consistent and does not explain how the policy objective will be achieved. The Plan is therefore unsound

**English Heritage recommends the following changes to the AAP in order to make it Sound:**

1. Paragraph 8.7, Bullet point 4 refers to two-level shopping street with high level links, this should be deleted.
2. Deletion of Policy CC3 Bullet point 10. Alternatively at 10 insert the text: *“Explore ways to provide cover over the main shopping streets that is consistent with the openness and locally distinctive solid canopies at first floor, as identified in the Development Guidelines SPD and incorporate....”*
3. Provide a detailed timetable for the production of the Public Realm Strategy that embraces landscape and circulation / use issues. Be clear about its status. This should be included within the Milestones at paragraph 3.17 and in the Monitoring section at paragraph 13.11.
4. 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."~~