

**Respondent English Heritage
Matter 3 Effectiveness****Plymouth City Centre AAP EiP****Matter 3 Effectiveness - Are the diagrams and Proposals Map sufficiently clear?**

The AAP cannot be said to be effective as it does not clearly demonstrate how the key policy objectives and policies will be achieved. Those diagrams, drawings and proposals maps it does have are ineffective use.

The concerns regarding the question this Matter covers are two fold:

The **first concern** is the quality of the existing diagrams and proposals map which are so poor as to render most of them ineffective. Even at the most basic level they do not provide any information of value and they are not effective at elaborating on the policy objectives or evidence base. For example which historic buildings particularly of local importance are proposed to be kept in the development proposals?

The maps and diagrams that are provided are not adequately placed in context: for example, orientating them through the use of road names.

At the beginning of Chapter 5, the 3D plan has a number of colour coded buildings. There is however no explanation of what the colours mean and also no indication of what the aim of the diagram is.

At the beginning of Chapters 7, 8, 9 and 11 there are diagrams which appear to be crudely expanded sections, or districts, of the central area. Again these diagrams are not clear and for a member of the public (less used to looking at plans) these are potentially very confusing. Even if accurately drawn, English Heritage questions what function they perform?

Throughout the document, either in policy areas or the following text, sites and / or specific buildings are referred to for either renovation or possible redevelopment, for example at CC8, CC9, CC11, CC14, (9.10) CC18. However, the evidence base for these policies is unclear, and it is uncertain how the policies will meet the objectives of the plan. A map of showing nationally listed and locally important buildings (that are proposed to be retained and renovated) and those buildings of lesser quality (that the AAP seeks to demolish) would provide clarity.

The **second concern** is the lack of any visualisations or drawings to either assess or demonstrate what the secondary, synergistic or cumulative impacts of 100,000sq m of office space and 100,000sq m of retail space, in terms of height, bulk and mass might mean for the existing, historic townscape of Plymouth.

For example, there are several references to a landmark building, at Policy Proposals CC13 and C11 along with 61,000sq m of retail, but no indication of the justification, nor impacts, of such a policy.

These ideas and policy proposals should be incorporated within an urban design and topographical analysis that identifies, for example, key viewpoints that help enhance legibility of the urban form. A visual expression of what any potential increase in height and mass will assist in providing clarity and understanding.

Once addressed to a satisfactory degree, there must be provision in the process and timetable for English Heritage to be able to review this information and state where we believe acceptable and unacceptable impacts will arise, and also identify as much as possible what redevelopment and interventions in terms of location, scale etc we think would be acceptable.

English Heritage recommends the following changes to the AAP:

Improved quality of all the diagrams and maps.

Clarification of the sites of all the proposed landmark buildings at CC13 and C11 should be depicted on a plan.

A clearly annotated map is required of those nationally listed and locally important buildings that are proposed to be retained and renovated and those that the AAP seeks to demolish should be included.

Include appropriate 3D modelling and Accurate Visual Representations (AVRs) of heights and bulk of proposals, to demonstrate the implications of C11, CC8, CC10, C11, CC12, CC13. Sites where an increase in height and/or bulk of proposals would harm the settings of listed buildings, and other historic assets, should be excluded.”