

**Respondent English Heritage
Matter 3 Effectiveness**

Plymouth City Centre AAP

Matter 3 Effectiveness - Does Policy CC18 need to have more detailed guidance on the form of development expected? Should not the Council's proposal to relocate the Civic Centre and Council House be included in CC18?

English Heritage feels that the need for more detailed guidance raised by the Inspector's question over CC18 is applicable to other Policy Proposals; these include CC8, CC9, CC11, CC14, (9.10) CC18. These policies identify sites and or specific buildings which, it refers to for either renovation, alteration or possible redevelopment are also pertinent to the question.

Beyond this point many of English Heritage's concerns on this Matter are explained in other statements, as well as in letters of December 2008 and September 2009. Nonetheless we feel it necessary to reiterate our concerns as it is a demonstration of the documents unsound nature. For brevity we have sought to summarise these issues that have been raised in other statements.

The AAP does not provide an effective plan-led approach to tall buildings as it has potentially identified inappropriate locations for tall buildings.

The justification for these landmark structures is within the Design SPD which forms part of the evidence base. There appears to be a lack the analysis necessary to determine the impacts upon specific listed buildings and the Abercrombie Plan.

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.

The Plan also seeks to accommodate 100,000 sqm of office space and 100,000 sqm of retail space along with a significant number of housing units. English Heritage does not have an in principal objection to intensification or an increase in building heights and larger floor plates. We are however is unsure how the intensification of development will affect the key attributes of the Abercrombie Plan and so, we presume, is the City Council.

3D modelling and visualisations illustrating the impacts must be properly undertaken, and assessed, before the plan is adopted. As a consequence any impacts are unknown and unjustified.

The City wishes to retain sufficient flexibility in its development agenda. It cannot, however, 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 have expressed concern over the AAP because as it is currently configured we cannot predict what the city centre will look like in 15 years and surely 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 and 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 far easier 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 cannot be said to be effective and is therefore unsound.