

**Oversight and Governance**

Chief Executive's Department
Plymouth City Council
Ballard House
Plymouth PL1 3BJ

Please ask for Claire Daniells, Senior
Governance Advisor
T 01752 305155
E democraticsupport@plymouth.gov.uk
www.plymouth.gov.uk
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CABINET – SUPPLEMENT PACK

Tuesday 9 July 2019
2.00 pm
Council House, Plymouth

Members:

Councillor Evans OBE, Chair

Councillor P Smith, Vice Chair

Councillors Haydon, Coker, Dann, Lowry, Penberthy, Jon Taylor, Laing and Kate Taylor.

Please refer to agenda item 11 overleaf.

Tracey Lee

Chief Executive

Cabinet

II. City Centre Conservation Area

(Pages I - 54)

Designation of City Centre Conservation Area Cabinet



Date of meeting: 09 July 2019
Title of Report: Designation of City Centre Conservation Area
Lead Member: Councillor Tudor Evans OBE (Leader)
Lead Strategic Director: Anthony Payne (Strategic Director for Place)
Author: Paul Barnard, Service Director for Strategic Planning & Infrastructure
Stuart Wingfield, Strategic Growth Manager
Contact Email: paul.barnard@plymouth.gov.uk
Your Reference: [Click here to enter text.](#)
Key Decision: No
Confidentiality: Part I - Official

Purpose of Report

The report proposes to designate part of Plymouth City Centre as a Conservation Area pursuant to Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

The area of the City Centre proposed for Conservation Area designation is centred around Royal Parade and Civic Square and comprises the area bounded by: New George Street to the north; Raleigh Street, Derry's Cross, Athenaeum Lane to the west; Notte Street to the South; and Old Town Street, St Andrews Cross and abutting the western boundary of the Barbican Conservation Area to the east. The area is shown on attached Map I.

The purpose of the proposed designation is to preserve or enhance the special character or appearance of the area.

Recommendations and Reasons

It is recommended that Cabinet:

1. Designate part of Plymouth City Centre as a Conservation Area pursuant to the Planning (Listed Buildings and Conservation Areas) Act 1990 section 69 as shown on Map I within the report.

Reason: To recognise the special architectural and historic interest of the area and to preserve or enhance its character or appearance.

2. To authorise Officers to carry out the notification procedures prescribed in section 70 of the Act.

Reason: To ensure the decision to designate a conservation area meets the statutory notification requirements.

3. To instruct officers to carry out a Conservation Area Appraisal and Management Plan for the City Centre Conservation Area.
4. Reason: To meet the requirements prescribed in section 71 of the Act and in the NPPF to prepare a Conservation Area Appraisal and Management Plan and to ensure that stakeholders have the opportunity to comment on the detailed management and monitoring arrangements for the conservation area.

Alternative options considered and rejected

Not to designate: this was rejected as an option because it would not afford the buildings and spaces identified in this area as of heritage significance the protection they would get if designated a conservation area.

Designate but change the boundary: this was rejected as an option because the Conservation Area Designation Assessment report and referenced evidence base detail the process undertaken to define the proposed boundary, including a full options assessment that considered the advantages and disadvantages of alternative boundaries. A number of respondents to the proposed designation have also suggested alternative boundaries and response to these is included in the summary report of comments received.

The boundary proposed is identified as it protects the best buildings and spaces in the City Centre while ensuring that the area is of a manageable scale such that any funds and resources can be targeted to best effect. In addition, the merits of including any other parts of the city centre in the conservation area can be considered as part of any future review if that is considered justified.

Relevance to the Corporate Plan and/or the Plymouth Plan

Corporate Plan:

The protection, enhancement and celebration of the City's unique history and assets of heritage significance forms a core part of the Plymouth Plan (March 2019) and Plymouth and South West Devon Joint Local Plan (March 2019) and is embedded through:

Plymouth Plan

1. The philosophy that underpins the plan – (1) Roots: The city's environment and the heritage is cared for and celebrated; and (3) Power: Local stewardship of heritage assets.
2. The Vision – A Healthy City - residents show great pride in the city's...built heritage, leading and supporting many initiatives to promote the city's history and its historic built...environment.
3. Strategic Objective SO 3: Delivering the international city: (3) Promoting Plymouth as an internationally competitive tourist destination...providing an accessible visitor experience which

capitalises on the city's ...built heritage assets, and delivers a long standing economic legacy for the city; and (4) establishing Plymouth as a distinctive, vibrant, cultural city known on the international stage for its rich heritage...having an equally strong appeal for residents, students, visitors and investors.

4. Policy INT1- Implementing Britain's Ocean City - (2) seeking the highest quality of architecture on key and prominent city centre...sites, which reflects and enhances Plymouth's unique ... heritage offer.
5. Policy INT3 – Positioning Plymouth as a major UK designation – (4) maintaining and delivering a vibrant mix of attractions and destinations to support the visitor economy, including in the...heritage sectors.

Plymouth and South West Devon Joint Local Plan

6. Policy SPT11: Strategic approach to the historic environment – the Local Planning Authorities will pursue a proactive and solution-orientated approach for the conservation and, where appropriate, enhancement of the historic environment, ensuring that it is promoted as a key element of local character and distinctiveness, forms a strategic context for regeneration and development, and is conserved or enhanced as part of the area's cultural offer, including in relation to:...conservation areas...[and] Non-designated heritage assets... In particular they will support proposals for heritage-led regeneration and working with developers and investors to encourage them to see historic and culturally led regeneration as the first choice method to achieve a quality legacy. In this respect, development should make a positive contribution to local character and the enhancement of local distinctiveness.
7. Policy PLY6 Improving Plymouths City Centre (1): Respects and celebrates the centre's mid-twentieth century built heritage, including the Beaux Arts grid of the 1943 Abercrombie Plan and the highest and good quality non-designated assets identified in the City Centre Masterplan (2) Recognises the importance of reinforcing the primacy of Armada Way as the principal thoroughfare from the station to the Hoe...[and] to respect the Abercrombie Plan's form and historic context.

Implications for the Medium Term Financial Plan and Resource Implications:

There are no major capital implications for Plymouth City Council as a result of this proposal.

The designation will impose greater controls on development in the area, which may result in a small increase in the cost of works to Council owned/ maintained land and property and trees and greater control over advertisements.

The designation will commit Plymouth City Council to preparing a Conservation Area Appraisal and Management Plan, which will require officer time to prepare, consult and implement.

The designation may result in a minimal increase in planning fees arising from processing of applications for planning permission or for pre-application enquiries, which may initially be greater – and therefore resulting in some additional workload – following designation. The designation would provide access to new funding streams including the High Street Heritage Action Zone Fund, which if successful at Expression of Interest stage, could provide up to £2 Million match funding for future capital works. The designation would also open up access to various Historic England grant programmes, which could be targeted to a variety of building and public realm improvement initiatives.

Carbon Footprint (Environmental) Implications:

There may be a misconception that designation as a Conservation Area will prevent buildings and spaces from contributing to climate change mitigation. Historic England recognises the importance of climate change mitigation and believes that energy efficiency and sustainable technology are compatible with the conservation of our heritage. A carefully balanced approach will need to be taken when considering proposals for climate change mitigation in the Conservation Area. Additional consents and/or a higher design specification maybe required. Historic England offers guidance on the installation of renewable energy generation and the historic environment, and also on energy efficiency and historic buildings.

Other Implications: e.g. Health and Safety, Risk Management, Child Poverty:

** When considering these proposals members have a responsibility to ensure they give due regard to the Council's duty to promote equality of opportunity, eliminate unlawful discrimination and promote good relations between people who share protected characteristics under the Equalities Act and those who do not.*

The designation alone will not have other implications. However, any works to land or buildings proposed as a result of the designation would need to be assessed on a project by project basis.

Appendices

**Add rows as required to box below*

Ref.	Title of Appendix	Exemption Paragraph Number (if applicable) <i>If some/all of the information is confidential, you must indicate why it is not for publication by virtue of Part 1 of Schedule 12A of the Local Government Act 1972 by ticking the relevant box.</i>						
		1	2	3	4	5	6	7
A	Briefing Report							
B	Equalities Impact Assessment							
C	Map 1 – Boundary							
D	Map 2 – Buildings of significance							
E	Map 3 – Spaces of significance							
F	Designation Assessment							
G	Consultation Summary Report							

Background papers:

**Add rows as required to box below*

Please list all unpublished, background papers relevant to the decision in the table below. Background papers are unpublished works, relied on to a material extent in preparing the report, which disclose facts or matters on which the report or an important part of the work is based.

Title of any background paper(s)	Exemption Paragraph Number (if applicable) <i>If some/all of the information is confidential, you must indicate why it is not for publication by virtue of Part 1 of Schedule 12A of the Local Government Act 1972 by ticking the relevant box.</i>

	1	2	3	4	5	6	7

Sign off:

Fin	pl.19. 20.43	Leg	LS/32 809/J P/Jun e19	Mon Off	Click here to enter text.	HR	Click here to enter text.	Asset s	Click here to enter text.	Strat Proc	Click here to enter text.
Originating Senior Leadership Team member: Paul Barnard											
Please confirm the Strategic Director(s) has agreed the report? Yes Date agreed: 02/07/2019											
Cabinet Member approval: Councillor Tudor Evans <i>approved by email</i> Date approved: 03/07/2019											

1. Background

- 1.1 The designation of conservation areas is a tool for conserving and enhancing the special character or appearance of a particular area. The power to declare a conservation area is set out in Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 1.2 Paragraph 184, of the National Planning Policy Framework highlights that heritage assets range from sites and buildings of local historic value to those of the highest international significance. It states: “These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations”. In relation to conservation area designations, paragraph 186 states: “When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest”.
- 1.3 The area of the City Centre proposed for conservation area designation is centred around Royal Parade and Civic Square and comprises the area bounded by: New George Street to the north; Raleigh Street, Derry’s Cross, Athenaeum Lane to the west; Notte Street to the South; and Old Town Street, St Andrews Cross and abutting the western boundary of the Barbican Conservation Area to the east. The area is shown on attached Map 1.
- 1.4 The purpose of the proposed designation is to preserve or enhance the special character or appearance of the unique beaux-art buildings and layout of the area. This has been defined in the accompanying Designation Assessment Report prepared in accordance with Paragraphs 11 and 16 of the Historic England Advice Note 1 (2019): Conservation Area Appraisal, Designation and Management (2nd Ed.).
- 1.5 The designation assessment needs to be considered in conjunction with the summary of comments received to the proposed designation; Map 1 – Proposed Conservation Area Boundary; Map 2 – Proposed Conservation Area Boundary and Buildings of Significance; Map 3 – Proposed Conservation Area Boundary and Spaces of Significance; and the Equality Impact Assessment.
- 1.6 Upon designation, the City Council will carry out the appropriate notifications in accordance with section 70 of the Act. Subsequently the City Council will commit to prepare a Conservation Area Appraisal and Management Plan in accordance with section 71 of the Act, NPPF and Historic England Advice Note 1 and include full consultation with landowners, stakeholders and the public.

2. How the area meets the statutory definition

- 2.1 A conservation area is an ‘area of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance’ Planning (Listed Buildings and Conservation Areas) Act 1990 s.69[1](a). Any area proposed for designation must meet the definition of the Act. The National Planning Policy Framework adds that in designating conservation areas, local planning authorities are to ensure that an area has sufficient special architectural or historic interest not to devalue the concept of conservation (paragraph 186).
- 2.2 Historic England Advice Note 1 (2019) Paragraph 16 recommends that in formally assessing the special historic or architectural interest it may have and whether it is desirable to preserve or enhance its character or appearance it is helpful to consider these as separate criteria (as set out in paragraph 11). In assessing the area against these criteria, Plymouth City Council has drawn upon the evidence base shown in section 2 of the Designation Assessment report, most notably

the Portico Heritage (2019) and Heritage Audit (2014) reports. A full comprehensive analysis of the area will be included in a subsequent Conservation Area Appraisal. Having analysed this evidence the assessment is that the area merits designation as a conservation area.

(a) Sufficient architectural or historic interest for the area to be considered 'special'?

- 2.3 Drawing primarily on the Heritage Audit and Portico Heritage reports, the special interest can be briefly defined as:
- 2.4 ***The specific period in history, the Plan, Professor Patrick Abercrombie & the completeness of the Plans implementation:*** Plymouth was one of the most heavily bombed and severely damaged City's in the UK during World War Two. The re-building of Plymouth centre was envisaged by Abercrombie in 1943 before the War had ended and when enacted was amongst the first major city centre re-building programmes to get underway in the post-War period. The Beaux-Arts street plan reflects the planning, architectural and social vision of Abercrombie and is a relatively unadulterated example of post-war planning, by the most prominent figure in that field, and is of high heritage significance (p120). It is acknowledged that there are elements in which departures from the plan have diluted its significance (notably to the north), but that Royal Parade remains, along with the civic area, the most successful space in the city and worthy of protection (p124).
- 2.5 Royal Parade and the civic area represents much of the earliest construction and is successful in terms of quality of construction and how it relates to the plan with building landmarks (Dingles/ Pearl Assurance) to demarcate the junction of the two major axes of Abercrombie's planned city (P124).
- 2.6 ***The buildings, architectural qualities and their architects:*** Abercrombie allowed individual architects the freedom to design the buildings but within a framework informed by his requirement for architectural consistency. This resulted in buildings designed by some of the leading architects of the time, including Thomas Tait of Sir John Burnet Tait and Partners, J Murray Easton, Curtis Green, Howard Robertson, Giles Gilbert Scott and Louis de Soissons, amongst others, as well as notable local architects, Walls & Pearn. The successful marrying of materials (particularly the use of Portland Stone) and the cohesion of applied art and architecture is very much of its time.
- 2.7 The Heritage Audit identifies the buildings on the southern side of Royal Parade as almost uniformly high heritage significance. The only heritage assets to fall into this category are the individually listed buildings or parks and gardens, which are not only architecturally/visually and historically significant in themselves, but also make a positive contribution to the character and appearance of the city centre in which they are situated. For the most part these are clustered within the proposed Conservation Area.
- 2.8 The buildings on the northern side of Royal Parade are all of medium to moderate significance. The heritage assets of medium significance are buildings that, while not meeting the criteria for listed building status, nevertheless are of distinct architectural importance and interest and/or are significant for the contribution they make to the setting of nearby listed buildings and towards creating a 'sense of place'. High-quality spaces which are made up of such buildings are likely to fall within this category. The heritage assets of moderate significance are those that make a positive contribution to their setting.

b) Whether this is experienced through its character or appearance?

- 2.9 Drawing primarily on the Heritage Audit and Portico Heritage reports, the experience of character and appearance relates very strongly to the unique city centre layout and building alignments and arrangements.
- 2.10 In defining its character and appearance, the existing City Centre follows very closely the proposals and overall philosophy set out in the 1943 'Plan for Plymouth'. This is most evident in the arrangement of streets and land uses, which are based on what was envisaged, notably the axial arrangement of Armada Way, Royal Parade, and New George Street. Despite some changes, the Heritage Audit notes that 'the conjunction of Royal Parade and the southern portion of Armada Way around the civic area, represents the most complete realisation of Abercrombie's plan, meaning the space as a whole represents a heritage asset of high significance' (p46).
- 2.11 It is therefore the planned form of the area that strongly defines the character, with buildings in many cases designed to demarcate or highlight specific spaces of quality. Several buildings are consciously placed in prominent locations with specific views in mind, such as that along the length of Armada Way and Royal Parade, with buildings acting as landmarks to stunning vistas. Probably the most notably example of this is the Royal Bank of Scotland on St Andrews Cross. It is for this reason that the Heritage Audit applies the same assessment to the spaces as it does to the buildings.
- 2.12 Within the proposed conservation area the spaces defined by Royal Parade, Civic Square and Armada Way are assessed as being of high significance. St Andrews Cross, Old Town Street and New George Street East are of medium significance and Derry's Cross, New George Street West and Old George Street are of moderate significance. These spaces help define the unique character of the area.

c) Whether it is desirable for that character or appearance to be preserved or enhanced, and what problems designation could help to solve.

- 2.13 The heritage significance of Plymouth City Centre has been extensively documented over the last two decades with a number of these studies recommending some conservation area designation. In defining the boundary for a conservation area regard has been had to a number of options, including the wider Abercrombie plan area. The proposed conservation area represents the highest quality and most complete realisation of the Abercrombie Plan and the highest concentration of buildings and spaces of high, medium and moderate heritage significance in the city centre. On this basis it is considered that it is desirable to preserve and enhance the character or appearance of this smaller area, because to some extent the wider area has been compromised by later, less sympathetic, additions which do not merit designation. As with any conservation area designation developments need to be monitored and the boundaries periodically reviewed.
- 2.14 The problems that designation could help to resolve include:
- To recognise, protect or enhance the special architectural and historic interest of the area and its character or appearance.
 - Supporting the regeneration of the City Centre, protecting the sustainability and economic vitality of the area, ensuring that new buildings harmonise with or complement their neighbours in scale, style and use of materials, inspiring new development of imaginative and high quality design.
 - Promoting appreciation and understanding of the City Centre's best Twentieth Century heritage assets which are often overlooked.

- Remove ambiguity surrounding the heritage significance of the city centre.
- Help to codify the 'group value' of the area and play an important role in creating a cohesive sense of place and destination.
- Ensuring that proposals for much needed change/ adaptation and investment in buildings and spaces can take place while preserving or enhancing the character or appearance of the area.

3. What does the designation of a conservation area mean?

- 3.1 The designation of a conservation area is not designed to stop development or change occurring to an area. Many new developments can, and indeed should, add positive enhancements to a conservation area in a complementary, as well as contemporary manner, which does not need to detract from the special architectural and historic significance of an area that led to its designation in the first place. The act of designation should therefore be seen as a positive regeneration tool, enabling related marketing and funding initiatives to be pursued, rather than a negative regulatory intervention.
- 3.2 As set out in Historic England Advice Note 1 (2019), paragraphs 7 and 8, conservation area designation introduces some additional controls over the way owners can alter or develop their properties. These controls include:
- The requirement in legislation and national planning policies to preserve and/or enhance, (the details of which are set out further in the National Planning Policy Framework and the Planning Practice Guidance).
 - Local planning policies which pay special attention to the desirability of preserving or enhancing the character or appearance of the area.
 - Control over demolition of unlisted buildings.
 - Control over works to trees.
 - Limitations on the types of advertisements which can be displayed with deemed consent.
 - Restriction on the types of development which can be carried out without the need for planning permission (permitted development rights).
 - Support for the use of Article 4 directions to remove permitted development rights where avoidable damage is occurring.
 - Clarification of archaeological interest, thereby assisting the protection of those assets.
- 3.3 In relation to the determination of planning applications, a conservation area designation means that as Local Planning Authority, the City Council should take account of:
- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - c) the desirability of new development making a positive contribution to local character and distinctiveness. (NPPF paragraph 192 refers).
- 3.4 Given the challenges facing city centres, arising from global market forces which are changing the nature of future retailing, alongside the City Council's own regeneration aspirations for Plymouth city centre set out in the Plymouth and South West Devon Joint Local Plan, it is considered that a conservation area designation will provide a positive additional tool to support a range of planned initiatives that will enable its role to be reconfigured and reimagined in the coming years.

4. Equality Impact Assessment

- 4.1 An Equality Impact Assessment has been prepared to assess the impact of this proposed designation. The Equality Impact Assessment shows that the designation should positively impact all people by promoting the City's unique history and protecting significant heritage assets. It is considered that adverse impacts could arise through the misconception that reasonable adaptations to buildings and spaces to cater for specific needs could not be carried out. To mitigate this impact communications will need to refer to Historic England's guidance ['Equality of Access Works to Listed Buildings and other Heritage Assets'](#). There are many examples of where accessibility requirements and historic environment considerations have been successfully integrated and the policies of the adopted Plymouth and South West Devon Joint Local Plan allow such judgements to be made on any future proposals. This is therefore not seen as an undue constraint.

5. Public Comments

- 5.1 The proposed designation has been published on the Council's web site and available for public comment for a period of two weeks between 17th June 2019 and 30th June 2019. The proposed designation has been widely publicised through the City Council's social media networks and covered in a front page article in the Plymouth Herald. The Council's consultation portal also posed three basic questions seeking feedback on the proposal:
- Do you support the proposed conservation area boundary?
 - Do you have any further comments to make on the designation itself?
 - Do you have any further comments to add to help inform the preparation of the Conservation Area Management Plan which we will be consulting upon in due course?
- 5.2 The responses are summarised in a separate report and have been considered in the preparation of this report. A total of 52 written comments were received on the portal and by email (comments on social media have not been counted but assessment of these is covered in the summary report). Of these, 59% supported the proposal, 20% objected and 21% did not specify support or objection. Of the objections, some challenged the protection of what they consider to be 'eyesore' or 'bleak' buildings and called for more widespread demolition and replacement, while others objected specifically to the proposed boundary. Others supported the designation but also called for changes to the boundary. A number of respondents called for the inclusion of the whole of Armada Way and some for inclusion of the whole of the Abercrombie Plan area. Other respondents supported the designation as proposed.
- 5.3 Having assessed and considered all the public comments made it is concluded that the proposed area shown on Map 1 and as described in the updated Designation Assessment should be designated a conservation area.

6. Conclusions and Recommendations

- 6.1 It is considered that it is desirable to designate part of Plymouth City Centre as a Conservation Area pursuant to the Planning (Listed Buildings and Conservation Areas) Act 1990 section 69 because this meets the legislative requirements and criteria set out in guidance. The designation of the conservation area is consistent with the Corporate Plan, the Plymouth Plan and the Plymouth and South West Devon Joint Local Plan as set out in the report

- 6.2 Cabinet are also requested to authorise Officers to carry out the notification procedures prescribed in section 70 of the Act and to instruct officers to carry out a Conservation Area Appraisal and Management Plan for the City Centre Conservation Area.

EQUALITY IMPACT ASSESSMENT

City Centre Conservation Area



STAGE 1: What is being assessed and by whom?

What is being assessed - including a brief description of aims and objectives?	<p>The proposal is to designate part of Plymouth City Centre as a Conservation Area pursuant to section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>The area of the City Centre proposed for Conservation Area designation is centred around Royal Parade and Civic Square and comprises the area bounded by: New George Street to the north; Raleigh Street, Derry's Cross, Athenaeum Lane to the west; Notte Street to the South; and Old Town Street, St Andrews Cross and abutting the western boundary of the Barbican Conservation Area to the east.</p> <p>The purpose of the proposed designation is to preserve or enhance the special character or appearance of the area.</p>
Responsible Officer	Stuart Wingfield
Department and Service	Strategic Planning & Infrastructure, Strategic Growth
Date of Assessment	26 June 2019

STAGE 2: Evidence and Impact

Protected Characteristics (Equality Act)	Evidence and information (e.g. data and feedback)	Any adverse impact?	Actions	Timescale and who is responsible?
Age	The ONS mid-year	All age groups will	Ensure that	Upon designation – July 19 –

STAGE 2: Evidence and Impact				
Protected Characteristics (Equality Act)	Evidence and information (e.g. data and feedback)	Any adverse impact?	Actions	Timescale and who is responsible?
	<p>population estimates from 2016 are as follows:</p> <p>Under 5 15,881 6.0%</p> <p>Under 16 46,808 17.7%</p> <p>Under 18 52,354 19.8%</p> <p>18-24 33,253 12.6%</p> <p>15-64 172,805 65.4%</p> <p>65 and over 47,112 17.8%</p> <p>75 and over 21,401 8.1%</p> <p>85 and over 6,224 2.4%</p>	<p>benefit from the protection or enhancement of the City's heritage.</p> <p>There may be a perception that buildings and spaces cannot be adapted to address issues of accessibility for age groups more likely to have restricted mobility.</p>	<p>communications associated with the proposed designation reference Historic England 'Equality of Access Works to Listed Buildings and other Heritage Assets' guidance</p>	Responsible Officer.
Disability	<p>More people are living with a disability now than in the past because we're living longer and improved medical treatments are enabling more people to manage long-term health problems. The Equality and Human Rights Commission says that the majority of people over 50 will have a long-term health condition by</p>	<p>People living with a disability will benefit from the protection or enhancement of the City's heritage.</p> <p>There may be a perception that buildings and spaces cannot be adapted to address issues of accessibility for people with disabilities, including but not limited</p>	<p>Ensure that communications associated with the proposed designation reference Historic England 'Equality of Access Works to Listed Buildings and other Heritage Assets' guidance</p> <p>Refer any subsequent proposals for change to</p>	Upon designation – July 19 – Responsible Officer.

STAGE 2: Evidence and Impact				
Protected Characteristics (Equality Act)	Evidence and information (e.g. data and feedback)	Any adverse impact?	Actions	Timescale and who is responsible?
	<p>2020.</p> <p>A total of 31,164 people declared themselves as having a long-term health problem or disability in the 2011 Census.</p> <p>1,297 adults currently registered with a GP in Plymouth have some form of a Learning Disability (2013/14).</p>	to, restricted mobility.	the area to work closely with groups including PADAN, Age Concern, Dementia Friendly and Public Health at concept design stage to address specific needs and concerns.	
Faith, Religion or Belief	<p>Christianity is the biggest faith in the city with more than 58 per cent of the population (148,917 people).</p> <p>32.9 per cent (84,326) of the Plymouth population stated they had no religion.</p> <p>Those with a Hindu, Buddhist, Jewish or Sikh religion combined totalled less than 1 per cent.</p>	No adverse impact anticipated	No action required	

STAGE 2: Evidence and Impact				
Protected Characteristics (Equality Act)	Evidence and information (e.g. data and feedback)	Any adverse impact?	Actions	Timescale and who is responsible?
Gender - including marriage, pregnancy and maternity	Overall 50.2 per cent of our population are women and 49.8 per cent are men. Main concerns for women include the gender pay gap, issues related to pregnancy and maternity and sexual harassment and violence including domestic abuse. Men are less likely to attend university, have a shorter life expectancy and are also affected by domestic abuse, although to a lesser extent than women.	No adverse impact anticipated	No action required	
Gender Reassignment	It is estimated that there may be somewhere between 1,287 and 2,146 adults in the city that are experiencing some degree of gender variance.	No adverse impact anticipated	No action required	
Race	The racial composition of the City is changing and not all residents and visitors understand	No adverse impact anticipated	New or replacement signage or historic interpretation where proposed to be assessed	Upon designation – July 19 – Responsible Officer.

STAGE 2: Evidence and Impact				
Protected Characteristics (Equality Act)	Evidence and information (e.g. data and feedback)	Any adverse impact?	Actions	Timescale and who is responsible?
	English.		for ease of understanding	
Sexual Orientation -including Civil Partnership	On average, respondents were less satisfied with their life nowadays than the general population, scoring it 6.5 out of 10, compared with 7.7 for the general UK population. Trans men scored 5.1 and Trans women scored 5.5.	No adverse impact anticipated	No action required	

STAGE 3: Are there any implications for the following? If so, please record 'Actions' to be taken		
Local Priorities	Implications	Timescale and who is responsible?
Reduce the gap in average hourly pay between men and women by 2020.	No adverse impact	No action required
Increase the number of hate crime incidents reported and maintain good satisfaction rates in dealing with racist, disablist, homophobic, transphobic and faith, religion and	No adverse impact	No action required

STAGE 3: Are there any implications for the following? If so, please record 'Actions' to be taken		
Local Priorities	Implications	Timescale and who is responsible?
belief incidents by 2020.		
Good relations between different communities (community cohesion)	The designation aims to promote awareness of and appreciation for the City's unique history and in particular the often misunderstood and undervalued post-war heritage of Plymouth City Centre. This should help promote community cohesion by encouraging all communities to have pride in their City Centre.	Upon designation – July 19 – Responsible Officer.

STAGE 4: Publication			
Director, Assistant Director/Head of Service approving EIA.	Paul Barnard	Date	26.06.2019

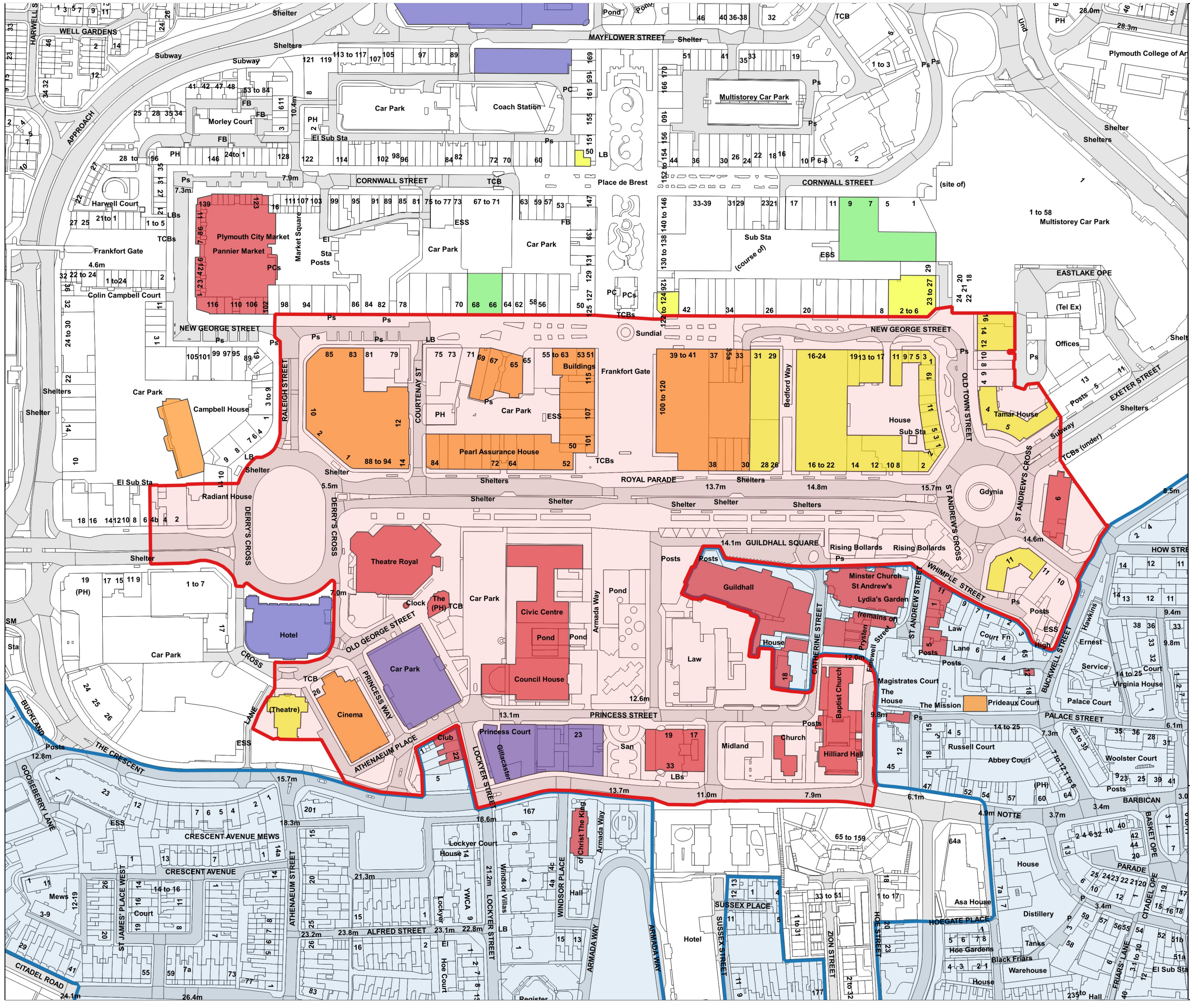
Map 1 - Proposed
Conservation Area Boundary

- Legend
- Proposed Conservation Area
 - Existing Conservation Areas



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Map 2 - Proposed
Conservation Area Boundary
and Buildings of Significance -
Map Updated July 2019

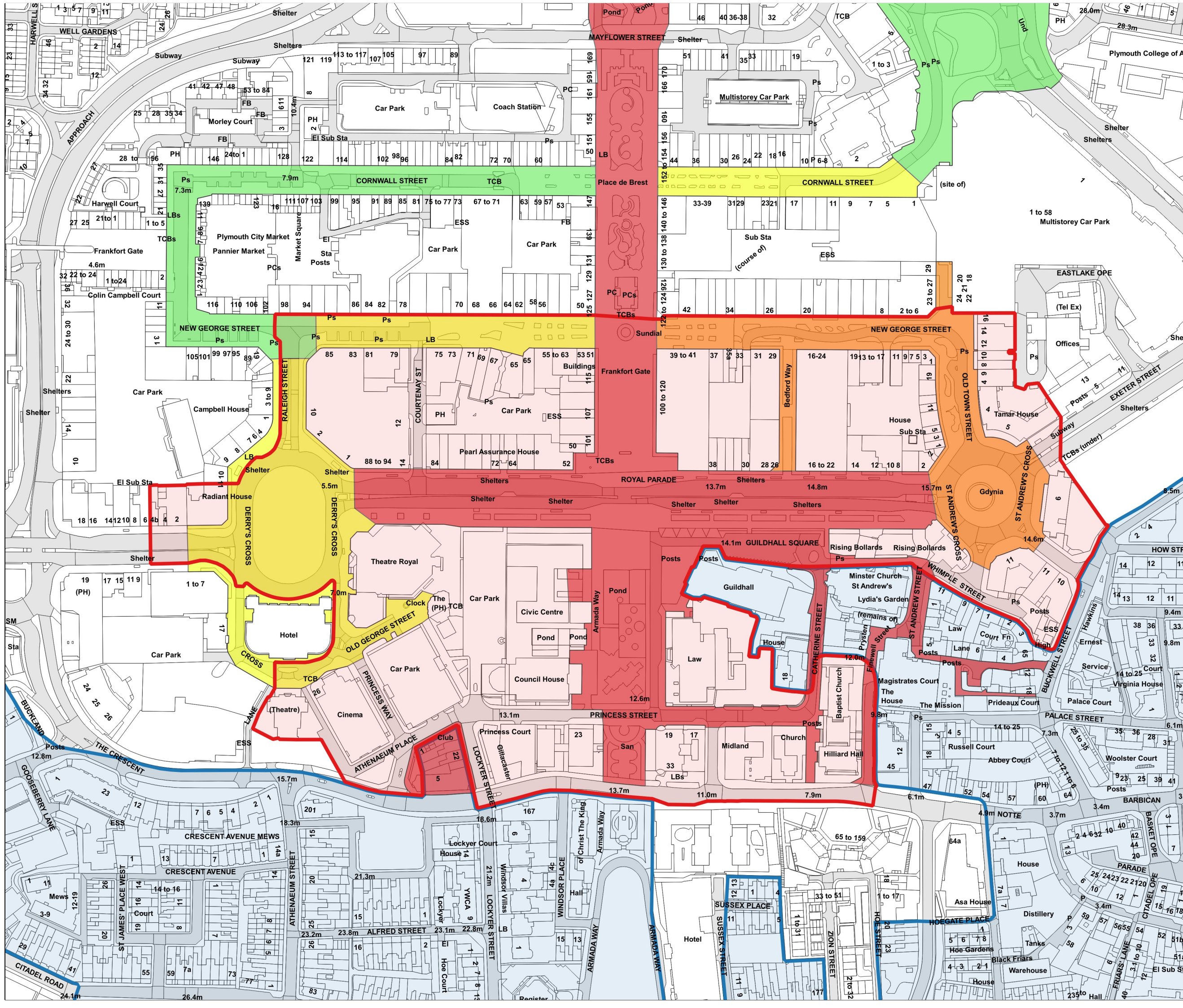


- Legend**
- Proposed Conservation Area
 - Existing Conservation Area
 - Buildings of Significance*
 - High Significance
 - Medium Significance
 - Moderate Significance
 - Low Significance
 - Intrusive

* Source: Asset Heritage Consulting (2014) Plymouth City Centre Heritage Audit and Statement of Significance and updated following subsequent listings
<https://www.plymouth.gov.uk/sites/default/files/PlymouthCityCentreDevelopmentStudy/AppendixA.pdf>



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Map 3 - Proposed Conservation Area Boundary and Spaces of Significance

Legend

- Proposed Conservation Area
- Existing Conservation Areas
- Spaces of Significance*
- High Significance
- Medium Significance
- Moderate Significance
- Low Significance

* Source: Asset Heritage Consulting (2014) Plymouth City Centre Heritage Audit and Statement of Significance. <https://www.plymouth.gov.uk/sites/default/files/PlymouthCityCentreDevelopmentStudyAppendixA.pdf>



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PLYMOUTH CITY CENTRE PROPOSED CONSERVATION AREA DESIGNATION ASSESSMENT

July 2019

PROPOSED CONSERVATION AREA DESIGNATION ASSESSMENT

Plymouth City Centre



I. Introduction

- I.1 In accordance with the Planning (Listed Buildings and Conservation Areas) Act 1990 section 69 (*the Act*), Plymouth City Council proposes to designate a part of Plymouth City Centre as a Conservation Area. The proposal will be reported to the Council's Cabinet meeting on Tuesday 9th July 2019 for consideration.
- I.2 The purpose of this document is to explain how and why the area has been identified for Conservation Area designation and how it meets the statutory definition of the Act. This report is provided as a 'designation assessment' in accordance with Paragraphs 11 and 16 of the Historic England Advice Note 1 (2019): Conservation Area Appraisal, Designation and Management (2nd Ed.).
- I.3 This assessment should be read in conjunction with accompanying Map 1 – Proposed Conservation Area Boundary, Map 2 – Proposed Conservation Area Boundary and Buildings of Significance, and Map 3 – Proposed Conservation Area Boundary and Spaces of Significance
- I.4 This assessment report is not intended to be read as a Conservation Area Appraisal or Management Plan. These documents will be prepared following designation and in accordance with the provisions of section 71 of the Act, NPPF and Historic England Advice Note 1 and include full consultation with landowners, stakeholders and the public.
- I.5 This assessment and accompanying Map 2 have been updated in response to comments received to the proposed designation from 17th June 2019 to 30th June 2019.

2. **Relevant legislation, policy, guidance and evidence base**

- 2.1 In proposing Conservation Area designation and in the preparation of this assessment, regard has been had to the following legislative, policy, guidance and evidential framework. For ease of reference the most pertinent sections/ paragraphs relevant to the process of designation are highlighted. However, each source should be considered in its entirety.
- 2.2 **Legislation**
 Planning (Listed Buildings and Conservation Areas) Act 1990 – in particular sections 69 and 70.
<https://www.legislation.gov.uk/ukpga/1990/9/section/69>
<https://www.legislation.gov.uk/ukpga/1990/9/section/70>
 Town and Country Planning Act 1990 – in particular section 196D
<http://www.legislation.gov.uk/ukpga/2013/24/schedule/17>
- 2.3 **Policy**
 National Planning Policy Framework – in particular paragraphs 186, 200, 201, Glossary
<https://www.gov.uk/government/publications/national-planning-policy-framework--2>
 Plymouth & South West Devon Joint Local Plan (2019) – in particular Vision, SO1[6], SO3[4], SPT11, PLY6, DEV21, DEV23
<https://www.plymouth.gov.uk/sites/default/files/JLPAadoptedVersion.pdf>
- 2.4 **Guidance**
 National Planning Policy Guidance – in particular Paragraphs 025, 047, 018
<https://www.gov.uk/government/collections/planning-practice-guidance>
 Historic England Advice Note 1 (2019): Conservation Area Appraisal, Designation and Management (2nd Ed.)
<https://historicengland.org.uk/images-books/publications/conservation-area-appraisal-designation-management-advice-note-1/heag-268-conservation-area-appraisal-designation-management/>
 Twentieth Century Society – Designating Conservation Areas which include C20th Buildings: Good Practice Guidance
<https://c20society.org.uk/wp-content/uploads/2018/04/Designating-C20-Conservation-Areas-good-practice-guidelines.pdf>
- 2.5 **Evidence Base**
 Portico Heritage (2019) City Centre Conservation Area Options study.
 Twentieth Century Society (2017) Potential Conservation Areas Scoping Report
https://c20society.org.uk/wp-content/uploads/2018/03/Final-C20-Society-CAs-Project_Report.pdf
 Twentieth Century Society (2017) DRAFT Appraisal for a Potential Conservation Area – Plymouth Core City Centre and Appendix 1: Buildings which are considered to positively contribute to the special character of the area
 Plymouth City Council (2017) Joint Local Plan - Heritage Impact Assessment
https://www.plymouth.gov.uk/sites/default/files/HeritageImpactAssessment_1.pdf
 LDA Design (2017) Plymouth City Centre Strategic Masterplan
<https://www.plymouth.gov.uk/sites/default/files/PlymouthCityCentreStrategicMasterplan.pdf>
 Asset Heritage Consulting (2014) Plymouth City Centre Heritage Audit and Statement of Significance.
<https://www.plymouth.gov.uk/sites/default/files/PlymouthCityCentreDevelopmentStudyAppendixA.pdf>
 Gould, J (2010) Plymouth: Vision of a modern City.
<https://historicengland.org.uk/images-books/publications/plymouth-modern-city/plymouth/>
 Alan Baxter & Associates (2005) Plymouth Rapid Urban Character Study
<https://www.plymouth.gov.uk/sites/default/files/PlymouthRapidUrbanCharacterisationStudy2005.pdf>
 Mackay, Zogolovich and Harradine (2004) Vision for Plymouth
 Gould, J (2000) Plymouth Planned: The Architecture of the Plan for Plymouth 1943-1962.

3. **Description of the Area**

- 3.1 The area of the City Centre proposed for Conservation Area designation is centred around Royal Parade and Civic Square and comprises the area bounded by: New George Street to the north; Raleigh Street, Derry's Cross, Athenaeum Lane to the west; Notte Street to the South; and Old Town Street, St Andrews Cross and abutting the western boundary of the Barbican Conservation Area to the east. The area is shown on attached Map I.
- 3.2 The area forms an important part of Plymouth City Centre which was comprehensively rebuilt, following four years of bombardment during World War Two, based on *A Plan for Plymouth 1943* by Professor Patrick Abercrombie and James Paton Watson (revised 1947). The Beaux-Arts Plan is widely regarded as a highly significant example of post-war planning, by the most prominent figure (Abercrombie) in that field, and the area proposed for Conservation Area designation at Royal Parade and Civic Square is considered the best and most complete realisation of that plan (See section 5).
- 3.3 The Plan and its eventual realisation along with each of the buildings and spaces within it have been comprehensively assessed over the last two decades. The 2014 Heritage Audit commissioned by Plymouth City Council shows that the proposed area for Conservation Area designation comprises the following heritage assets:
- 3.4 *Buildings of High significance:* 8 statutory Listed Buildings: Royal Bank of Scotland, St Andrew's Cross (Grade II); Theatre Royal (Grade II); Clock Tower, Derrys Cross (Grade II); The Bank PH (Grade II); Council House & Former Civic Centre (Grade II); Catharine Street Baptist Church (Grade II); Former Barclay's Bank (Grade II); and Unitarian Church (Grade II). With the exception of the Pannier Market (Grade II), the remaining Listed Buildings within the City Centre are already within Conservation Areas.
- 3.5 *Buildings of Medium significance:* the area comprises nearly all of the buildings identified by the study as being of medium significance or of 'local heritage interest which make a significant contribution to the overall character and appearance of the area'. This includes House of Fraser (former Dingles) and adjacent buildings, group of buildings between the former Derry's Department Store and Pearl Assurance Building and the former Reel Cinema.
- 3.6 *Buildings of Moderate significance:* the area comprises nearly all of the buildings identified by the study as being of moderate significance or 'heritage assets of lesser heritage interest which nevertheless make a contribution to the overall character and appearance of the City Centre'. This includes the Athenaeum Derry's Cross, former Lloyds Bank, Debenhams, Norwich Union House, Royal Building, Post Office St Andrews Cross.
- 3.7 The area comprises none of the buildings of *low significance*, few buildings of *neutral significance* and two *intrusive buildings*, notably Theatre Royal Car Park and Princess Court.
- 3.8 *Spaces of High Significance:* the area comprises the highest concentration of spaces of high significance including the Registered Park & Garden, Civic Square (Grade II), section of Armada Way and the tree-lined Royal Parade.
- 3.9 *Spaces of Medium Significance:* the area comprises three spaces of medium significance, St Andrews Cross, Old Town Street and New George Street East.
- 3.10 *Spaces of moderate significance:* the area comprises three spaces of moderate significance, Derry's Cross, New George Street West and Old George Street.

- 3.11 The area comprises no spaces of *low significance*, few spaces of *neutral significance* and no *intrusive spaces*.

4. Background to the proposed Conservation Area designation

- 4.1 The post-war planning and rebuilding of Plymouth City Centre and the distinct character and appearance of its buildings and spaces have for a long time been recognised as being of significant heritage value for the City and nationally. This has been documented in numerous studies commissioned and undertaken by the City Council and independently by Architectural and Historic Interest groups.
- 4.2 Most notably these studies include Jeremy Gould's report *Plymouth Planned: The Architecture of the Plan for Plymouth 1943-1962* (2010) and his book *Plymouth: Vision of a modern City* (2010) and Alan Baxter & Associates *Plymouth Rapid Urban Character Study* (2005). More recently Plymouth City Council commissioned Asset Heritage Consulting to prepare a *City Centre Heritage Audit and Statement of Significance* (2014) and undertook its own *Heritage Impact Assessment* (2017) to inform the preparation of the Joint Local Plan. The Twentieth Century Society has also undertaken its own work including preparing a *Draft Core City Conservation Area Appraisal* (2017). In 2019 Plymouth City Council commissioned Portico Heritage to prepare a *City Centre Conservation Area Options* study to help define an appropriate boundary.
- 4.3 Thanks in part to this extensive body of research there is now a growing awareness and appreciation of the historical and architectural importance of post-war regeneration. There are also a number of other places that have successfully embraced this post-war legacy to harness economic and cultural benefits with Coventry and Le Havre highlighted as particularly relevant precedents.
- 4.4 Plymouth City Centre is the main service centre for Plymouth and the wider sub-region. Its' catchment extends to some 500,000+ people. Like many other Town/ City Centre's and High Streets, Plymouth City Centre is under threat from the structural changes taking place in retail and the changing way that people use their Centre's. Plymouth City Centre is particularly susceptible to these changes because of its over reliance and comparative over provision of retail floorspace and lack of other uses such as office/work space and residential. This is in part a legacy of the zoning approach of the post-war plan.
- 4.5 Bold action is needed to meet these challenges and to reshape the City Centre for the future. This approach is set out in the City Centre Strategic Masterplan (2017) and Joint Local Plan (2019). This means improving existing retail stock to meet modern retailing needs, converting vacant buildings and spaces to new uses, upgrading the public realm and encouraging more homes, work spaces, leisure, culture and community uses.
- 4.6 Major interventions are currently proposed with planning applications recently submitted for the refurbishment of Norwich Union House and public realm improvements to Old Town Street and New George Street and for conversion and refurbishment of the Listed former Civic Centre. Plymouth City Council has also committed £4.5m to refurbish the Listed Civic Square.
- 4.7 Plymouth City Council recognises the special architectural and historic interest of this part of our City Centre and wants to ensure that the changes that need to take place do so, whilst preserving or enhancing the character or appearance of the area. Rapid designation of the area as a Conservation Area would enable these and future proposals to be considered in the context of a Conservation Area. The purpose of this would not be to frustrate or halt these critical investments in our city centre, but to ensure that what is special about the area is appropriately considered in their assessment and preserved or enhanced through positive change.

- 4.8 The designation may also enable access to funding streams that could support regeneration consistent with a detailed Conservation Area Appraisal and Management Plan.

5. How the boundary has been determined

- 5.1 In February 2019 Plymouth City Council commissioned Portico Heritage to consider potential Core City Centre Conservation Area Options. This work considered four options for potential Conservation Area designation including: 1. Full City Centre and University Campus; 2. Core Abercrombie plan area; 3. Cornwall Street and South; and 4. Royal Parade and Civic Square. The report considered the advantages and disadvantages of each option.
- 5.2 Options 1 and 2 include the main elements of Plymouth's post-war redevelopment, however there is a chance that their size will dilute both the economic benefits and public appreciation that Conservation Area designation might bring. Option 3 encompasses the key buildings and spaces and would ensure that the spirit of the Abercrombie Plan for Plymouth is positively recognised and celebrated, however even this option is potentially too large to ensure any regeneration is visibly effective. A more tightly defined area, such as Option 4 will still include the key spaces and buildings – enabling the best quality, materials, public art and public spaces to be positively recognised and celebrated - and could ensure that any funding that is spent has the best possible chance to meaningfully enhance the area.
- 5.3 The Portico Heritage report recommended a Conservation Area based on Option 4 as it provides the best chance to recognise the most important part of Plymouth's post-war redevelopment in a way that can focus funding and effective enhancement in a purposeful and worthwhile way. It encompasses the majority of most significant buildings and the key access of Royal Parade and Armada Way. This proposed boundary strongly reflects the boundary proposed by the Twentieth Century Society (2017) DRAFT Appraisal for a Potential Conservation Area – Plymouth Core City Centre.
- 5.4 If designated, the Portico Heritage report recommends that the boundary is reviewed in line with good practice and national planning policy when the Local Plan is reviewed in five years' time to consider a further extension to encompass that area described in Option 3.
- 5.5 Whilst not equivalent to Conservation Area status, it should be noted that the main attributes of the wider Abercrombie Plan including the Beaux Arts grid, the best quality non-designated assets, the primacy of Armada Way, and control of building heights are afforded policy protection through PLY6 of the adopted Plymouth & South West Devon Joint Local Plan.

6. How the area meets the statutory definition

- 6.1 A conservation area is an 'area of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance' (Planning (Listed Buildings and Conservation Areas) Act 1990 s.69[1](a)). Any area proposed for designation must meet the definition of the Act. The National Planning Policy Framework adds that in designating conservation areas, local planning authorities are to ensure that an area has sufficient special architectural or historic interest not to devalue the concept of conservation (paragraph 186).
- 6.2 Historic England Advice Note 1 (2019) Paragraph 16 recommends that in formally assessing the special historic or architectural interest it may have and whether it is desirable to preserve or enhance its character or appearance it is helpful to consider these as separate criteria (as set out in paragraph 11). In assessing the area against these criteria, Plymouth City Council has drawn upon the evidence base shown in section 2, most notably the Portico Heritage (2019) and Heritage Audit (2014) reports. A full comprehensive analysis of the area will be included in a subsequent Conservation Area Appraisal.

(a) Sufficient architectural or historic interest for the area to be considered 'special'?

- 6.3 Drawing primarily on the Heritage Audit and Portico Heritage reports, the special interest can be briefly defined as:
- 6.4 *The specific period in history, the Plan, Professor Patrick Abercrombie & the completeness of the Plans implementation:* Plymouth was one of the most heavily bombed and severely damaged City's in the UK during World War Two. The re-building of Plymouth centre was envisaged by Abercrombie in 1943 before the War had ended and when enacted was amongst the first major city centre re-building programmes to get underway in the post-War period. The Beaux-Arts street plan reflects the planning, architectural and social vision of Abercrombie and is a relatively unadulterated example of post-war planning, by the most prominent figure in that field, and is of high heritage significance (p120). It is acknowledged that there are elements in which departures from the plan have diluted its significance (notably to the north), but that Royal Parade remains, along with the civic area, the most successful space in the city and worthy of protection (p124).
- 6.5 Royal Parade and the civic area represents much of the earliest construction and is successful in terms of quality of construction and how it relates to the plan with building landmarks (Dingles/ Pearl Assurance) to demarcate the junction of the two major axes of Abercrombie's planned city (P124).
- 6.6 *The buildings, architectural qualities and their architects:* Abercrombie allowed individual architects the freedom to design the buildings but within a framework informed by his requirement for architectural consistency. This resulted in buildings designed by some of the leading architects of the time, including Thomas Tait of Sir John Burnet Tait and Partners, J Murray Easton, Curtis Green, Howard Robertson, Giles Gilbert Scott and Louis de Soissons, amongst others, as well as notable local architects, Walls & Pearn. The successful marrying of materials (particularly the use of Portland Stone) and the cohesion of applied art and architecture is very much of its time.
- 6.7 The Heritage Audit identifies the buildings on the southern side of Royal Parade as almost uniformly High heritage significance. The only heritage assets to fall into this category are the individually listed buildings or parks and gardens which are not only architecturally/visually and historically significant in themselves but also make a positive contribution to the character and

appearance of the city centre in which they are situated. For the most part these are clustered within the proposed Conservation Area.

- 6.8 The buildings on the northern side of Royal Parade are all of medium to moderate significance. The heritage assets of medium significance are buildings that, while not of 'listable' quality, are of distinct architectural importance and interest and/or are significant for the contribution they make to the setting of nearby listed buildings and towards creating a 'sense of place'. High-quality spaces which are made up of such buildings are likely to fall within this category. The heritage assets of moderate significance are those that make a positive contribution to their setting.

b) Whether this is experienced through its character or appearance?

- 6.9 Drawing primarily on the Heritage Audit and Portico Heritage reports, the experience of character and appearance can be briefly defined as follows:
- 6.10 In defining its character and appearance, the existing City Centre is very much that proposed in the 'Plan for Plymouth'. This is most evident in the arrangement of streets and land uses, which are based on what was envisaged, notably the axial arrangement of Armada Way, Royal Parade, and New George Street. Despite some changes, the Heritage Audit notes that 'the conjunction of Royal Parade and the southern portion of Armada Way around the civic area, represents the most complete realisation of Abercrombie's plan, meaning the space as a whole represents a heritage asset of high significance' (p46).
- 6.11 It is therefore the planned form of the area that strongly defines the character, with buildings in many cases designed to demarcate or highlight specific spaces of quality. Several buildings are placed in prominent locations with specific views in mind, such as that along the length of Armada Way and Royal Parade, and buildings are placed at landmark points, such as the Royal Bank of Scotland on St Andrews Cross. It is for this reason that the Heritage Audit applies the same assessment to the spaces as it does to the buildings.
- 6.12 Within the proposed conservation area the spaces defined by Royal Parade, Civic Square and Armada Way are assessed as being of high significance. St Andrews Cross, Old Town Street and New George Street East are of medium significance and Derry's Cross, New George Street West and Old George Street are of moderate significance.

c) Whether it is desirable for that character or appearance to be preserved or enhanced, and what problems designation could help to solve.

- 6.13 The heritage significance of Plymouth City Centre has been extensively documented over the last two decades with a number of these studies recommending some Conservation Area designation. In defining the boundary for a Conservation Area regard has been had to a number of options, including the full Abercrombie plan area. The proposed conservation area represents the highest quality and most complete realisation of the Abercrombie Plan and the highest concentration of buildings and spaces of high, medium and moderate heritage significance in the city centre. On this basis it is considered that it is desirable to preserve and enhance the character or appearance of the area.
- 6.14 The problems that designation could help to resolve include:
- To recognise, protect or enhance the special architectural and historic interest of the area.

- Supporting the regeneration of the City Centre, protecting the sustainability and economic vitality of the area, ensuring that new buildings harmonise with or complement their neighbours in scale, style and use of materials, inspiring new development of imaginative and high quality design.
- Promoting appreciation and understanding of the City Centre's best Twentieth Century heritage assets which are often overlooked;
- Remove ambiguity surrounding the heritage significance of the city centre;
- Help to codify the 'group value' of the area and play an important role in creating a cohesive sense of place and destination.
- Ensuring that proposals for much needed change/ adaptation and investment in buildings and spaces can take place while preserving or enhancing the character or appearance of the area;

7. What does the designation of a conservation area mean?

- 7.1 As set out in Historic England Advice Note 1 (2019) paragraphs 7 and 8, Conservation Area designation introduces some additional controls over the way owners can alter or develop their properties.
- 7.2 These controls include:
- the requirement in legislation and national planning policies to preserve and/or enhance, as discussed further in the NPPF and the PPG
 - local planning policies which pay special attention to the desirability of preserving or enhancing the character or appearance of the area
 - control over demolition of unlisted buildings
 - control over works to trees
 - limitations on the types of advertisements which can be displayed with deemed consent
 - restriction on the types of development which can be carried out without the need for planning permission (permitted development rights)
 - support for the use of article 4 directions to remove permitted development rights where avoidable damage is occurring
 - clarification of archaeological interest, thereby assisting its protection
- 7.3 If you live in or run a business from a property in a conservation area you may need permission from the Council before making alterations such as cladding, inserting windows, installing satellite dishes and solar panels, adding conservatories or other extensions, laying paving or building walls.
- 7.4 Trees - If you are thinking of cutting down a tree or doing any pruning work you must notify the Council 6 weeks in advance if it has a trunk diameter of over 7.5cm at chest height. This is to give the Council time to assess the contribution the tree makes to the character of the conservation area and to decide whether to make a Tree Preservation Order. Please use the Conservation Area notification forms available on the website https://www.planningportal.co.uk/info/200130/common_projects/53/trees_and_hedges
- 7.5 Demolition or substantial demolition of a building within a conservation area will usually require permission from the Council.

8. **Notification and Next Steps**

- 8.1 Advanced notification of the proposal to designate the Conservation Area, including a draft copy of this designation assessment and accompanying plans (Map 1 – Proposed Conservation Area Boundary, Map 2 – Proposed Conservation Area Boundary and Buildings of Significance, and Map 3 – Proposed Conservation Area Boundary and Spaces of Significance) was published for public comment from Monday 17th June 2019 to Sunday 30th June 2019.
- 8.2 The proposed designation was widely publicised through the City Council's social media networks and covered in a front page article in the Plymouth Herald. The Council's consultation portal also posed three basic questions seeking feedback on the proposal:
- Do you support the proposed conservation area boundary?
 - Do you have any further comments to make on the designation itself?
 - Do you have any further comments to add to help inform the preparation of the Conservation Area Management Plan which we will be consulting upon in due course?
- 8.3 The responses are summarised in a separate report and have been considered in the update of this assessment report. A total of 52 written comments were received on the portal and by email (comments on social media have not been counted but assessment of these is covered in the summary report). Of these, 59% supported the proposal, 20% objected and 21% did not specify support or objection. Of the objections, some challenged the protection of what they consider to be 'eyesore' or 'bleak' buildings and called for more widespread demolition and replacement, while others objected specifically to the proposed boundary. Others supported the designation but also called for changes to the boundary. A number of respondents called for the inclusion of the whole of Armada Way and some for inclusion of the whole of the Abercrombie Plan area. Other respondents supported the designation as proposed.
- 8.4 Having assessed and considered all the public comments made it is concluded that the proposed area shown on Map 1 and as described in this assessment should be designated a conservation area.
- 8.5 The proposed designation and a summary of all comments received during the above timeframe will be reported to Cabinet on Tuesday 9th July 2019.
- 8.6 If approved by Cabinet the area will be formally designated as a Conservation Area and shall be entered as a local land charge. In accordance section 70 of the Act, formal notification of the designation will be given to the Secretary of State and Historic England and will be published in the London Gazette and in at least one newspaper circulating in the area.
- 8.7 Plymouth City Council will prepare a Conservation Area Appraisal and Management Plan in accordance with the provisions of section 71 of the Act and Historic England Advice Note 1 and include full consultation with landowners, stakeholders and the public.
- 8.8 Plymouth City Council will submit an Expression of Interest to the High Streets Heritage Action Zones Scheme. If successful in the EOI, detailed bid's for funding will be worked up in conjunction with the preparation of the Conservation Area Appraisal and Management Plan.

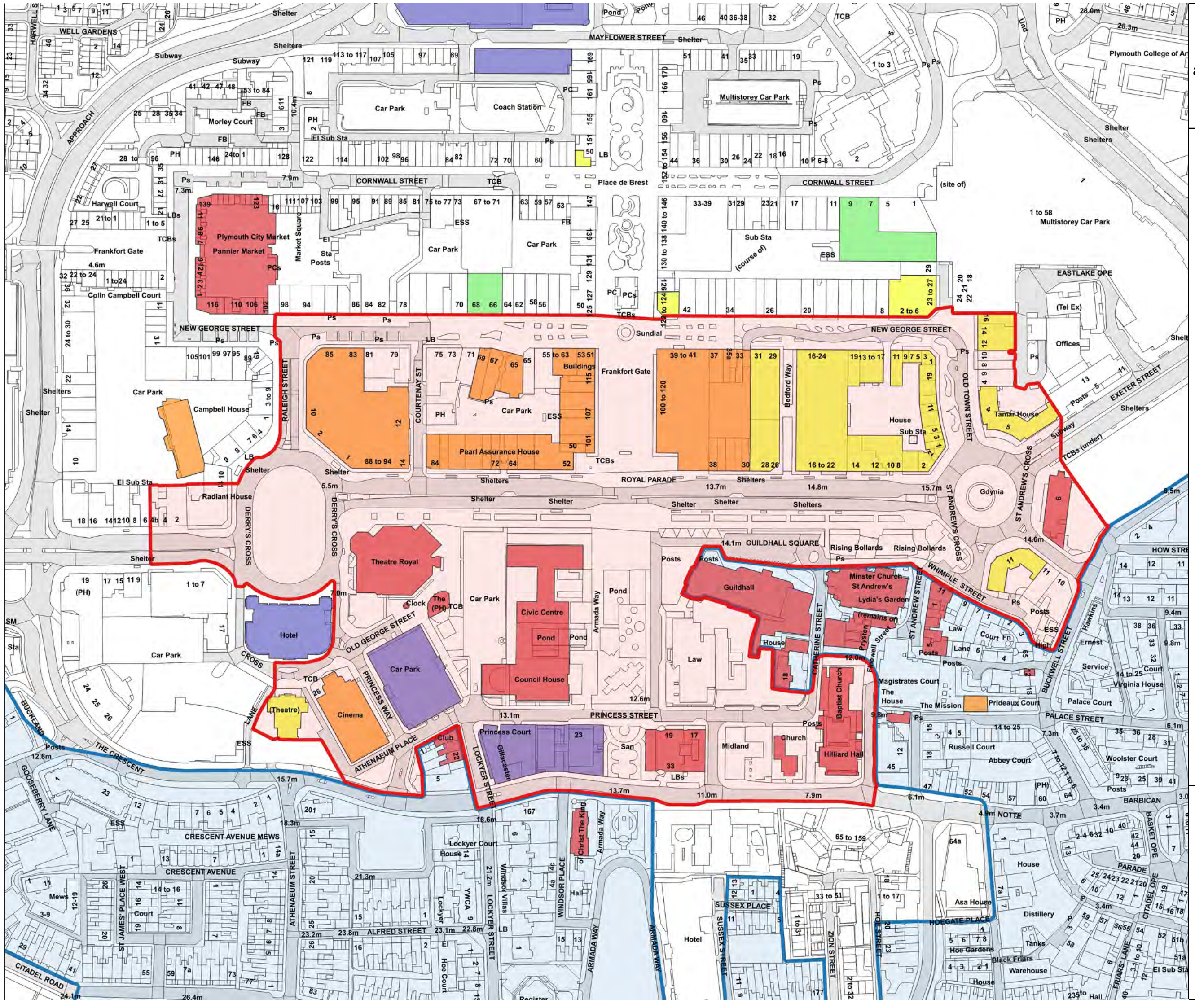
Map 1 - Proposed
Conservation Area Boundary

- Legend
- Proposed Conservation Area
 - Existing Conservation Areas



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Map 2 - Proposed
Conservation Area Boundary
and Buildings of Significance -
Map Updated July 2019



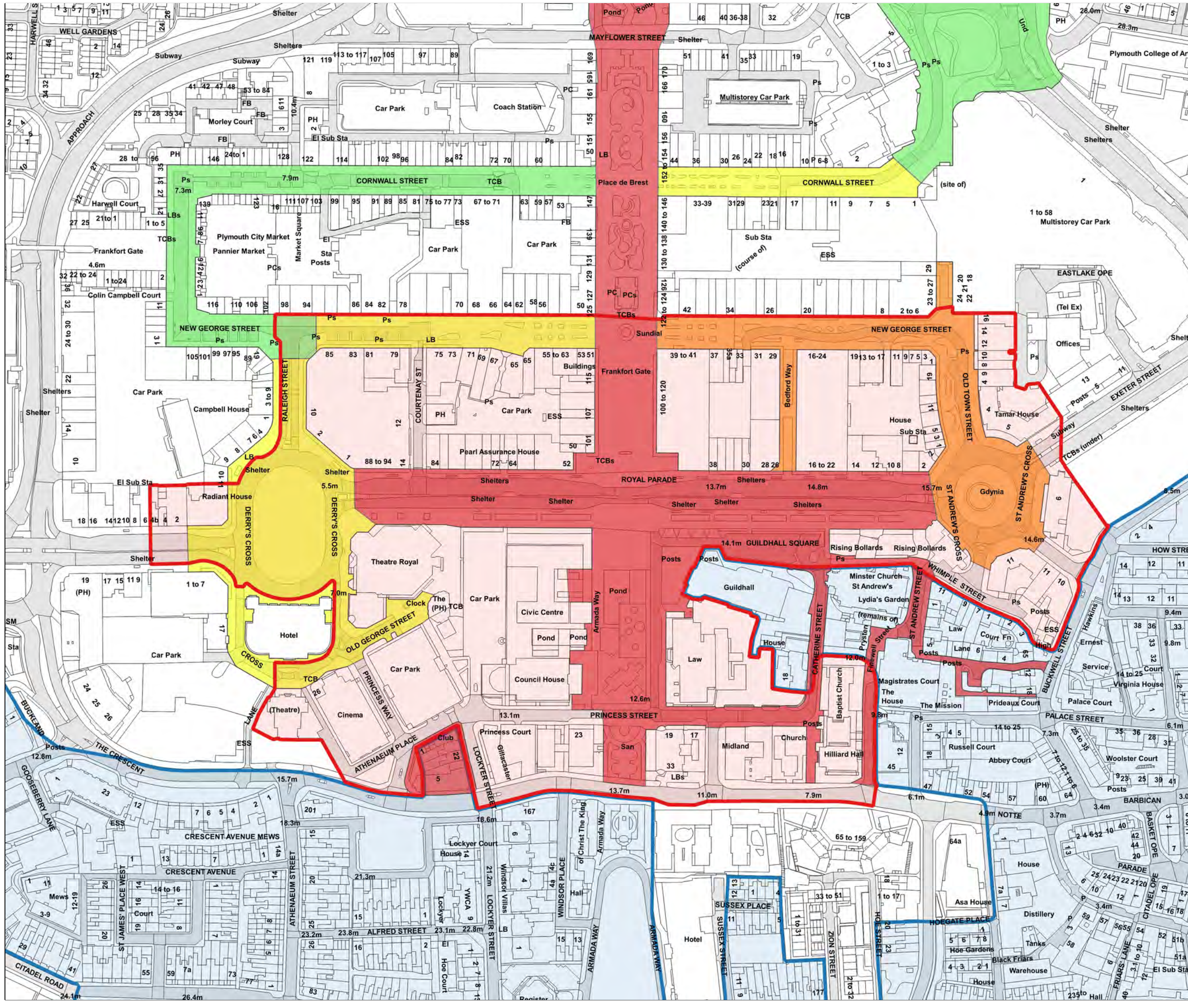
Legend

- Proposed Conservation Area
- Existing Conservation Area
- Buildings of Significance*
- High Significance
- Medium Significance
- Moderate Significance
- Low Significance
- Intrusive

* Source: Asset Heritage Consulting (2014) Plymouth City Centre Heritage Audit and Statement of Significance and updated following subsequent listings
<https://www.plymouth.gov.uk/sites/default/files/PlymouthCityCentreDevelopmentStudy/AppendixA.pdf>



Map 3 - Proposed Conservation Area Boundary and Spaces of Significance



Legend

- Proposed Conservation Area
- Existing Conservation Areas
- Spaces of Significance*
- High Significance
- Medium Significance
- Moderate Significance
- Low Significance

* Source: Asset Heritage Consulting (2014) Plymouth City Centre Heritage Audit and Statement of Significance. <https://www.plymouth.gov.uk/sites/default/files/PlymouthCityCentreDevelopmentStudyAppendixA.pdf>



Sample of Buildings of Heritage Significance: Heritage Audit (2014)

Heritage Assets of High Significance



Heritage Assets of Medium Significance



Heritage Assets of Moderate Significance



1. Former Barclays Bank– W. Curtis Green, Son, & Lloyd of London – 1950-2
2. Civic Centre – Jellicoe, Ballantyne, & Coleridge with H.J.W. Stirling (City architect) - 1954-61
3. Royal Bank of Scotland (formerly National Provincial) – B.C. Sherren, staff architect to National Provincial – 1958-9
4. Pearl Assurance – Alec F. French & Partners with Sir John Burnet Tait & Partners - 1950-2
5. House of Fraser (former Dingles) Department Store, Royal Parade
6. Reel Cinema (originally Royal Cinema) –William Riddell Glen – 1936-8, damaged 1941
7. Post Office (now Skipton, Post Office, and RBS) – C.Woodbridge, Ministry of Works – 1954-58
8. Debenhams – Donald Hamilton, Wakeford & Partners – 1952-8
9. Athenaeum, Derry's Cross – Walls & Pearn - 1958-61

Source: Heritage Audit, 2014.

A Plan for Plymouth (1943) Professor Patrick Abercrombie and James Paton Watson



CITY CENTRE CONSERVATION AREA

Consultation Summary Report – July 2019



1. INTRODUCTION

- 1.1 This report sets out how people got involved with the proposed City Centre Conservation Area designation consultation which ran from Monday 17th June until Sunday 30th June 2019. We received 52 comments via our on-line consultation portal and email. These responses have informed the Cabinet report.
- 1.2 To see a summary of each comment and how we have considered each one, please see **Appendix I**.

2. HOW PEOPLE GOT INVOLVED

- 2.1 The consultation asked whether people supported the proposed area for the City Centre Conservation Area designation and gave the opportunity for further comments to be made to be taken into consideration at the next stage of preparing the Appraisal and Management Plan.
- 2.2 The consultation was focussed around the Designation Assessment document, three key maps and a variety of evidence base studies. These were made available for viewing on our website at <https://www.plymouth.gov.uk/planningandbuildingcontrol/conservationandheritage/conservationareas/proposedcitycentreconservationarea> and a small display of the maps and assessment was available to view in the Guildhall foyer during usual opening hours.
- 2.3 We notified people of the consultation via our planning newsletter on gov delivery, a press release, emails to particular amenity groups and social media.
- 2.4 We encouraged representations via our consultation portal, email and post. To view all of the comments received via the portal and email, please visit <https://plymouth-consult.objective.co.uk/portal/planning/ccca2019/ccca19>
- 2.5 In addition to the 52 comments received via the portal and email, we promoted the consultation through the Council's Facebook and Twitter accounts.

Facebook:

177,114 reach

1,186 engagements (when people perform actions on your content, e.g. likes, share, comments, retweets)

43 likes or reactions

48 comments

17 shares

Twitter:

16,335 impressions (the number of times a post from your page is displayed)

444 engagements

31 Retweets

42 Likes.

- 2.6 The comments made via social media do not form part of the summary report as they were not made in accordance with the advertised consultation process. With the continued increase in use of social media, we are reviewing how we can take on board the comments received via social media in future consultations.

3. WHAT PEOPLE SAID

- 3.1 Of the 52 comments received, 38 were from local residents, 10 were from amenity groups, forums and organisations, 1 was on behalf of local landowners and 3 from statutory consultees.
- 3.2 In summary, the main issues raised during this consultation were:
- Some objected to the designation, challenging the protection of what they consider to be 'eyesore' or 'bleak' buildings and called for more widespread demolition and replacement;
 - Some objected to the designation, calling for changes to the boundary, typically the inclusion of the whole of the Abercrombie plan area or the whole of Armada Way;
 - Some supported the designation as proposed.
 - Some supported the designation but calling for changes to the boundary, typically the inclusion of the whole of the Abercrombie plan area or the whole of Armada Way; and
 - Some challenged the significance assessment, calling for buildings and spaces to be reassessed.

4. RESPONSE TO CONSULTATION

- 4.1 Having assessed and considered all the public comments made, some minor amendments to the Designation Assessment and Map 2 have been made.
- 4.2 No changes have been made to the proposed boundary. It is recognised that there are buildings and spaces of varying significance outside of the proposed area. However, the proposed boundary has been identified based on the most recent comprehensive significance assessment (2014) and options study (2019) set out in the designation assessment.
- 4.3 It is considered that the proposed boundary captures the best of the plan, buildings and spaces and meets the definition of the Planning (Listed Buildings & Conservation Areas) Act 1990, the National Planning Policy Framework and Historic England Guidance Note 1. It is concluded that the proposed area shown on Map 1 and as described in the updated Designation Assessment should be designated a conservation area.

	Resopnse type	Objective comment ID	Name	Organisation (where relevant)	Support/Object	Summary of comments	Council response	Proposed amendments
	Email	1	Janet Robson		Not completed	In favour of updating the city centre but suggests we should tidy up the area first.	The proposed Conservation Area designation is a key part of the wider City Centre regeneration agenda and is seen as a tool to help facilitate positive change.	No change required.
	Objective	2	Prof Marion Gibson		Support	The area chosen seems right. It is very important to get better settings for some of the major post war buildings. Suggest a couple of other buildings may also be considered to receive added protection, such as Opal Villas, Noah's Ark pub and the sculpture on the front of the Old Magistrates Court. Commends attempts to conserve Plymouth's mid-century modern buildings.	Support is welcomed. It is recognised that there are buildings and spaces of varying significance outside of the proposed area. However, the proposed boundary has been identified based on the most recent comprehensive significance assessment (2014) and options study (2019) set out in the designation assessment. We are satisfied that the proposed boundary captures the best of the plan, buildings and spaces and meets the definition of the Act, the NPPF and HE Guidance Note 1.	No change required.
	Email	3	Peter Golding		Not completed	Concerns regarding condition properties, vacant buildings, mainly in/around Union Street, which are being neglected whilst the rest of the city centre appears to be flourishing.	The City has 14 Conservation Areas, including Union Street, and all have their own challenges and need for investment. However, this is not a reason not to designate further Conservation Areas if they meet the definition of the Act. While regeneration is taking place in and around the City Centre the area continues to face many challenges and need for investment and positive change is required to ensure a sustainable future.	No change required.
	Objective	4	Dan Stevenson		Object	Considers that the layout of the streets should be preserved but the buildings should be demolished and redeveloped with an onus on apartments at higher levels and bars/restaurants on the ground floor.	The proposed Conservation Area has been identified based on the most recent comprehensive significance assessment (2014) and options study (2019) set out in the designation assessment. This highlights the heritage significance of both buildings and spaces worth of protection. The proposed Conservation Area designation is a key part of the wider City Centre regeneration agenda and is seen as a tool to help facilitate positive change.	No change required.
	Objective	5	Tony Stokoe	Twentieth Century Society	Support	Encouraging proposal and the Conservation Area is a good way to recognise the quality and significance of post war Plymouth and the buildings that form the core of the Abercrombie Plan.	Support is welcomed.	No change required.
	Objective	6	Ann Power		Support	Think it's a good idea to protect buildings and streets.	Support is welcomed.	No change required.
	Objective	7	Sarah Allen		Support	Great that more of the area is being considered for conservation as an example of old Plymouth. The area doesn't need more student/private accommodation or hotels/restaurants. Would like to see the Reel Cinema re opened as a cinema or arts venue/concert hall.	Support is welcomed..	No change required.

	Objective	8	Adrian Bridgman		Object	<p>Consider the designation is inappropriate, given the many undesirable alterations which have already been permitted and concerned these may be more difficult to reverse, especially if Article 4 restrictions are applied. Questions whether there is another type of designation which would protect the layout of Armada Way and Royal Parade and the 1950s buildings which make the city centre unique without placing a millstone around the neck of progress.</p> <p>The boundary should include the whole of Armada Way up to North Cross to protect it from building encroachment. This wouldn't mean that landscaping can't be periodically refreshed. Cannot see logical reason for including top of Union Street and including buildings which impede the rehabilitation of the art deco Colin Campbell House.</p>	The proposed Conservation Area designation is a key part of the wider City Centre regeneration agenda and is seen as a tool to help facilitate positive change. Article 4 directions are not proposed by this designation but could be considered if, following the preparation of a detailed Conservation Area Appraisal and Management Plan, such additional controls were considered necessary. It is recognised that there are buildings and spaces of varying significance outside of the proposed area. The proposed boundary has been identified based on the most recent comprehensive significance assessment (2014) and options study (2019) set out in the designation assessment. We are satisfied that the proposed boundary captures the best of the plan, buildings and spaces and meets the definition of the Act, the NPPF and HE Guidance Note 1.	No change required.
	Objective	9	Scott Laycock		Support	Plymouth is a fantastic city with wonderful heritage which needs to be protected for future generations. Specifically requests to see ABC/Reel Cinema protected and feels it could be used for other purposes.	Support is welcomed. The proposed Conservation Area designation is a key part of the wider City Centre regeneration agenda and is seen as a tool to help facilitate positive change	No change required.
	Objective	10	Andrew Byford		Support	Excellent proposal that is long over-due. Some buildings require tidying up. Hopes that modern day buildings with unauthorised changes can be rectified. Suggests that the canopy line along Armada Way should be reinstated so it is the same level along the block. Thinks there are number of quick wins to ensure the city is ready for the Mayflower celebrations.	Support is welcomed. The proposed Conservation Area designation is a key part of the wider City Centre regeneration agenda and is seen as a tool to help facilitate positive change.	No change required.
	Objective	11	Edward Lees		Support	Need to ensure that we don't prevent reasonable changes being made to suit future circumstances so we are a city that works rather than a 'museum that flounders'.	Support is welcomed. The proposed Conservation Area designation is a key part of the wider City Centre regeneration agenda and is seen as a tool to help facilitate positive change	No change required.
	Objective	12	Robert Bothma-Stevens		Support	Pleased that this is happening. Considers that the whole of Armada Way should be included and the strategic boulevard should be respected along its whole length. Fully support landscape works along Armada Way and inclusion within the boundary should not prevent this from happening.	Support is welcomed. It is recognised that there are buildings and spaces of varying significance outside of the proposed area. The proposed boundary has been identified based on the most recent comprehensive significance assessment (2014) and options study (2019) set out in the designation assessment. We are satisfied that the proposed boundary captures the best of the plan, buildings and spaces and meets the definition of the Act, the NPPF and HE Guidance Note 1.	No change required.
	Objective	13	Reinherd Quayle		Object	Questions why we are trying to preserve featureless concrete boxes. Supports the Bank public house and Derry's Clock being protected. However, feels the Civic Centre and House of Fraser buildings should be removed. Suggests we should try to restore Plymouth to pre-war where possible.	The proposed Conservation Area has been identified based on the most recent comprehensive significance assessment (2014) and options study (2019) set out in the designation assessment. This highlights the heritage significance of both buildings and spaces worthy of protection. Many of the buildings are of Portland Stone. The Civic Centre along with 7 other buildings are Listed Buildings in their own right. The proposed Conservation Area designation is a key part of the wider City Centre regeneration agenda and is seen as a tool to help facilitate positive change.	No change required.
	Objective	14	Tanya Shepherd		Support	Fully support the proposals. Feels that Plymouth often fails to capitalise on its existing heritage and features of historical significance.	Support is welcomed.	No change required.

28/06 @9:38	Email	15	Arnold Melhuish		Support	<p>Pleased that the Conservation Area has been proposed for its fine example of post-war city architecture. Feels it should be listed but making it a Conservation Area is almost as good.</p> <p>However, notes that Armada Way is not included although it is described as being of importance. It is the jewel of the city centre.</p> <p>In relation to the water feature, feels that the Council have been short-sighted in deciding the pump is too expensive to repair and running costs too onerous.</p>	Support is welcomed. It is recognised that there are buildings and spaces of varying significance outside of the proposed area. The proposed boundary has been identified based on the most recent comprehensive significance assessment (2014) and options study (2019) set out in the designation assessment. We are satisfied that the proposed boundary captures the best of the plan, buildings and spaces and meets the definition of the Act, the NPPF and HE Guidance Note 1.	No change required.
	Objective	16	Andrew Rathbone		Support	Such an extension to the Conservation Area is very welcome but the zone should include the Pannier Market and its setting, onwards up and either side of Cornwall Street.	Support is welcomed. It is recognised that there are buildings and spaces of varying significance outside of the proposed area. The proposed boundary has been identified based on the most recent comprehensive significance assessment (2014) and options study (2019) set out in the designation assessment. We are satisfied that the proposed boundary captures the best of the plan, buildings and spaces and meets the definition of the Act, the NPPF and HE Guidance Note 1. The designation assessment and options study recommends that the boundary is reviewed in line with good practice and national planning policy when the Local Plan is reviewed in five years' time to consider a further extension if necessary.	No change required.
	Email	17	Sam Cookson		Not completed	Considers that Civic Centre should be demolished. Does not feel it has any aesthetic quality or sympathetic asymmetry. The other buildings in the city centre are worth preserving as they reflect an idea of post war brave new world.	The Civic Centre is a Listed Building in its own right and is already protected from demolition.	No change required.
	Email	18	Sharon Trevarthen		Not completed	Objects to the Civic Centre remaining as a building of high significance. Considers it an eyesore.	The Civic Centre is a Listed Building. All Listed buildings are categorised as high significance.	No change required.
	Objective	19	Janet Vosper		Object	<p>Suggests that the area should be extended to include the whole area of the grid, and especially the open spaces. This would give the council more power to protect key open spaces and to insist upon suitable quality, style, scale and massing of new buildings to complement and enhance the frontages to the open spaces. Considers it is important to protect the key vista from the railway station to the Hoe and any development which would complete the missing north end should be encouraged.</p> <p>Any unprotected 'islands' or areas very close to the city centre should now be included in one or other designated Conservation Area, which would help to eliminate low grade potential eyesores.</p>	It is recognised that there are buildings and spaces of varying significance outside of the proposed area. The proposed boundary has been identified based on the most recent comprehensive significance assessment (2014) and options study (2019) set out in the designation assessment. We are satisfied that the proposed boundary captures the best of the plan, buildings and spaces and meets the definition of the Act, the NPPF and HE Guidance Note 1. The designation assessment and options study recommends that the boundary is reviewed in line with good practice and national planning policy when the Local Plan is reviewed in five years' time to consider a further extension if necessary.	No change required.

20/06 @14:27	Email	20	Simon Hickman	Historic England	Support	Historic England welcomes the proposals, having long championed the city's mid-century heritage as unique and of high quality. The designation of the conservation area will recognise the quality and provide for long-term sustainable management. Agree with the proposed boundary, although do suggest the buildings which flank the north west corner of Derry's Cross also warrant inclusion. However, the boundary picks up the majority of the significant post war buildings within the city centre and will hopefully allow for targeted improvements in the central core. Welcome the commitment to review, and possibly extend, the boundary of the conservation area as part of the joint local plan review in five years time. Applaud the proposals which will preserve and enhance the character and appearance of an area of considerable architectural and historic interest.	Support is welcomed.	No change required.
	Objective	21	Tom Clarke	Theatres Trust	Support	<i>No comments made.</i>	Support is welcomed.	No change required.
	Objective	22	Andrew Welch		Support	This should have been done years ago.	Support is welcomed.	No change required.
	Objective	23	Michael Sowden		Object	Considers that when you conserve anything, you prevent the next generation improving an area or buildings which is deteriorating and the cost increases. Suggests that the city centre needs demolishing and starting again.	The proposed Conservation Area designation is a key part of the wider City Centre regeneration agenda and is seen as a tool to help facilitate positive change.	No change required.
	Objective	24	John Stephens		Object	Questions with the change in retail patterns and internet sales whether we should protect an area this large. Feels we need to revitalize the city centre making it more open as the future seems to be more about leisure than retail. The area needs to be used for greater parts of the day, 7 days a week. Need to move with the times and not be hindered by conservation area restraints.	The proposed Conservation Area designation is a key part of the wider City Centre regeneration agenda and is seen as a tool to help facilitate positive change.	No change required.
	Objective	25	Geoffrey Wright		Support	Agree with the proposal in map 1. Considers there is some disparity between maps 2 and 3. Map 2 shows the buildings fronting onto Old Town Street and the upper part of New George Street to be only of moderate significance. Map 3 shows the spaces in these areas to be reversed in significance. This seems illogical. The Box and the University are to be of increasing importance to our city centre and greater significance should be given to the spaces leading to them. Map 3 - suggests that the significance of Royal Parade should be extended to take in the Royal Bank of Scotland. New George Street and Old Town Street should be designated a uniform moderate significance. Map 3 - the area leading to The Box and University should have its significance raised to moderate.	Support for the designation and proposed boundary is welcomed. Map's 2 and 3 are extracts from the 2014 Heritage Audit report by Asset Heritage, as updated by subsequent building Listings. They are provided as evidence to the proposed designation. The heritage significance of buildings and spaces will be revisited as part of the preparation of the Conservation Area Appraisal and Management Plan.	No change required.
	Objective	26	Mr T Mitchell		Support	Excellent idea, fully supported.	Support is welcomed.	No change required.
	Objective	27	Jason Sculthorpe		Object	Disagrees with the notion that Plymouth has agreeable and beautiful architectural buildings. Considers the city centre is dated, unemotional and stark. Suggests we need to create a new city centre that uses 21st century materials with green credentials and quality places to sit and enjoy. Need buy in from locals to maintain a healthy and vibrant city centre with commercial success; leading to job creation and prosperity for investment. Suggests preserving some buildings that are enjoyed by a section of people but fill the gaps with innovation and new ideas.	The proposed Conservation Area has been identified based on the most recent comprehensive significance assessment (2014) and options study (2019) set out in the designation assessment. This highlights the heritage significance of both buildings and spaces worth of protection. The proposed Conservation Area designation is a key part of the wider City Centre regeneration agenda and is seen as a tool to help facilitate positive change.	No change required.
	Objective	28	Caroline Blackler		Support	Relieved to see Athenaeum and Reel Cinema within the boundary. Feels that we must ensure that Plymouth retains its significant heritage buildings otherwise there is a risk that we become a city with little cultural value.	Support is welcomed.	No change required.
20/06 @10:30	Email	29	Martyn Dunn	South West Water	Not completed	Notes the consultation.	Response is noted.	No change required.
25/06 @11:16	Email	30	Michael Phelan		Support	Fully supports the proposed conservation area plans.	Support is welcomed.	No change required.

21/06 @ 16:08	Email	31	Marcus Salmon	Environment Agency	Not completed	Thank you for opportunity to comment on the proposed city centre conservation area. The proposed conservation area raises no concerns from an Environment Agency perspective.	Response is noted.	No change required.
22/06 @ 07:47	Email	32	Sharon Jenkins	Natural England	Not completed	No specific comments to make.	Response is noted.	No change required.
24/06 @ 18:07	Email	33	Helene Jessop	RSPB	Not completed	Recommends a number of urban biodiversity enhancements to be adopted as standards for renovation/rebuild/new build so that buildings and planted areas provide opportunities for nature to thrive. Detailed recommendations around: - Nest sites; - Planting; - Connectivity for wildlife and people; and - Transport.	These comments appear to relate to the management of the area which will be set out in a detailed Conservation Area Management Plan. We will ensure these comments are considered in the preparation of the Management Plan.	No change required.
	Objective	34	Penny Tarrant	Hoe Neighbourhood Forum	Object	Request that the boundary is extended to include the entirety of the public realm up to North Cross. This is an iconic part of the city and the whole length of the green space should have the same level of protection as provided as being part of the Conservation Area.	It is recognised that there are buildings and spaces of varying significance outside of the proposed area. The proposed boundary has been identified based on the most recent comprehensive significance assessment (2014) and options study (2019) set out in the designation assessment. We are satisfied that the proposed boundary captures the best of the plan, buildings and spaces and meets the definition of the Act, the NPPF and HE Guidance Note 1. The designation assessment and options study recommends that the boundary is reviewed in line with good practice and national planning policy when the Local Plan is reviewed in five years' time to consider a further extension if necessary.	No change required.
	Objective	35	Lucy Carayon	Ancient Monuments Society	Support	Fully supports the designation, which will be a positive and inclusive way of celebrating Plymouth's post-war civic and commercial architecture. The Abercrombie and Watson plan for Plymouth is of national significance and the city has one of the finest collections of 20th century buildings.	Support is welcomed.	No change required.
	Objective	36	Ron Wheeler	Plymouth Civic Society	Support	<i>No comments made.</i>	Support is welcomed.	No change required.
	Email	37	Mark Underwood	British Land Company PLC	Not completed	British Land recognises the quality of the buildings in the proposed Conservation Area and welcomes the recognition that the designation is not intended to frustrate or halt critical investments within the city centre. Whilst it is important that the special architectural and historic interest of this part of the city centre is recognised and protected through a Conservation Area, it should not serve to restrict and fetter the ability of the centre to evolve in the future. A particular focus of the Appraisal and Management Plan and SPD should provide flexibility in use classes, with support in the SPD that enables high street units to respond to market trends quickly and efficiently which is important in the context that the Conservation Area designation will remove some permitted development right flexibilities.	The proposed Conservation Area designation is a key part of the wider City Centre regeneration agenda and is seen as a tool to help facilitate positive change. We will ensure that these comments are considered in the preparation of the Conservation Area Appraisal and Management Plan.	No change required.
	Objective	38	Nicola Bryant		Support	Feel its time that Plymouth held onto its historic buildings and should be using them to shout about our city, rather than demolishing and replacing with inappropriate buildings that jar with the current landscape.	Support is welcomed.	No change required.
	Objective	39	Mr D Collins		Object	Considers that many of the buildings in the proposed conservation area are eyesores and should be considered for redevelopment not conservation. Disheartened at this proposal. Suggests being open to an innovative new future and conserve what we will actually want in the future, not just another eyesore.	The proposed Conservation Area has been identified based on the most recent comprehensive significance assessment (2014) and options study (2019) set out in the designation assessment. This highlights the heritage significance of both buildings and spaces worth of protection. The proposed Conservation Area designation is a key part of the wider City Centre regeneration agenda and is seen as a tool to help facilitate positive change.	No change required.

	Objective	40	Lloyd Hunt		Object	Considers that the city centre is in need of drastic change to attract more people. Preventing change to the bleak, colourless buildings seems as short-sighted and mistaken as the post-war plans. Wide streets and open spaces must be maintained for public use. Iconic buildings should be protected for the public.	The proposed Conservation Area has been identified based on the most recent comprehensive significance assessment (2014) and options study (2019) set out in the designation assessment. This highlights the heritage significance of both buildings and spaces worth of protection. The proposed Conservation Area designation is a key part of the wider City Centre regeneration agenda and is seen as a tool to help facilitate positive change.	No change required.
	Objective	41	Paul Channing		Support	<i>No comments made.</i>	Support is welcomed.	No change required.
	Objective	42	Susan Holmes		Support	Suggests that the boundary should be extended to include all of Armada Way. Feels that this area needs to be treated better and have some creative design and art work, new lighting, revise the waterflow, and use the space for interactive events.	It is recognised that there are buildings and spaces of varying significance outside of the proposed area. The proposed boundary has been identified based on the most recent comprehensive significance assessment (2014) and options study (2019) set out in the designation assessment. We are satisfied that the proposed boundary captures the best of the plan, buildings and spaces and meets the definition of the Act, the NPPF and HE Guidance Note 1. The designation assessment and options study recommends that the boundary is reviewed in line with good practice and national planning policy when the Local Plan is reviewed in five years' time to consider a further extension if necessary.	No change required.
	Objective	43	Dr Hilary Kolinsky		Support	Support the proposed designation but considers a wider area would be a more appropriate reflection of the heritage value within the city centre estate and would help to address the economic polarisation created by Drake Circus , Royal Parade/Old Town Street. Concerned that as drawn, there is a danger that the result will be further degradation of the areas outside of the boundary when it is these areas which need most attention. Considers that option 2 of the Portico report would be a more useful boundary to help channel heritage and high street funding towards areas that genuinely need support. Fears that the proposed boundary will exacerbate decline in the west end of the centre and will channel public funds into the hands of the developers. Recommends that the boundary is reviewed at the earliest opportunity and suggests that PCC should adopt a policy of supporting heritage funding bids made by local enterprises and projects, to maximise local economic opportunities that arise from Conservation Area status.	It is recognised that there are buildings and spaces of varying significance outside of the proposed area. The proposed boundary has been identified based on the most recent comprehensive significance assessment (2014) and options study (2019) set out in the designation assessment. We are satisfied that the proposed boundary meets the definition of the Act, the NPPF and HE Guidance Note 1. The designation assessment and options study recommends that the boundary is reviewed in line with good practice and national planning policy when the Local Plan is reviewed in five years' time to consider a further extension if necessary.	No change required.

	Objective	44	Tanya Griffiths	Twentieth Century Society - South West Group	Support	<p>Welcome and support the designation. However, see it as a missed opportunity to recognise and protect the more complete masterplan. Urges the Council to consider extending the boundary at the earliest opportunity to Option 2 of the Portico report. Considers it unfortunate that the boundary excludes the buildings on the north side of New George Street and significantly the Pannier Market and Frankfort Gate.</p> <p>Highlights the exclusion of the Unitarian Church from the signifance plan and recommends its inclusion.</p> <p>Also suggests the significance map should more clearly identify the registered Civic Square.</p> <p>Suggests that the Appraisal and Management Plan should re-appraise the significance of the buildings on the north and east side of New George Street and the Derry's Cross Group. Suggests there should be further consideration of the open space designations as integral to the value of town planning.</p>	The omission of the Listed Unitarian Church is noted and Map 2 will be updated. It is recognised that there are buildings and spaces of varying significance outside of the proposed area. The proposed boundary has been identified based on the most recent comprehensive significance assessment (2014) and options study (2019) set out in the designation assessment. We are satisfied that the proposed boundary meets the definition of the Act, the NPPF and HE Guidance Note 1. The designation assessment and options study recommends that the boundary is reviewed in line with good practice and national planning policy when the Local Plan is reviewed in five years' time to consider a further extension if necessary. Map's 2 and 3 are extracts from the 2014 Heritage Audit report by Asset Heritage, as updated by subsequent building Listings. They are provided as evidence to the proposed designation. The heritage significance of buildings and spaces will be revisted as part of the preparation of the Conservation Area Appraisal and Management Plan.	Update map 2 to show the Listed Unitarian Church as High Significance.
28/06 @16.54	Email	45	Grace Etherington	Twentieth Century Society	Support	<p>Supports the conservation area designation.</p> <p>Suggest that the Unitarian Church on Notte Street should be recognised as a High Significance building in line with other Grade II listed buildings.</p> <p>Proposes a small extension to the Conservation Area boundary to the north as beneficial, including the northern parades of shops on New George Street and inclusion in the designation would offer the chance for closer scrutiny over potential refurbishment or redevelopment schemes that would have a direct impact on New George Street and Armada Way which are spaces of high, medium and moderate significance.</p> <p>Considers there to be a strong case for the consideration of setting of the conservation area to be included in management guidelines, as there is great</p>	The omission of the Listed Unitarian Church is noted and Map 2 will be updated. It is recognised that there are buildings and spaces of varying significance outside of the proposed area. The proposed boundary has been identified based on the most recent comprehensive significance assessment (2014) and options study (2019) set out in the designation assessment. We are satisfied that the proposed boundary meets the definition of the Act, the NPPF and HE Guidance Note 1. The designation assessment and options study recommends that he boundary is reviewed in line with good practice and	Update map 2 to show the Listed Unitarian Church as High Significance.
29/06 @ 23:02	Email	46	Richard Sroka	Plymouth Civic Society	Support	<p>Supports the proposal to designate part of the city centre as a conservation area and see it as a way of protecting the reconstructed city. Additionally, also in favour of the preservation and enhancement of the public realm.</p> <p>Suggest that the boundary is extended northwards along the Armada Way axis to North Cross.</p> <p>Notes that some buildings of significance (i.e. Plymouth Market, Methodist Hall) are outside of the boundary as are others on either side of Armada Way between New George Street and Cornwall Street. Presumes that such buildings would be taken into account in an extended Conservation Area after the suggested five year review of the current proposal.</p> <p>Unclear whether the facades of other significant buildings along the northern boundary would enjoy the protection that a Conservation Area would offer.</p> <p>Notes that many of the buildings behind the facades are of poor quality, particularly towards the West End.</p> <p>Notes that other buildings in the proposed area (e.g. the Theatre Royal Car Park and Princess Court) are identified as intrusive and presumably not for preservation and enhancement.</p> <p>Expects necessary protocols would be put in place to control signage, shop fronts, street furniture etc to make the area attractive to all users, visitors and residents.</p> <p>Notes that some windows are blanked out to create more retail space but this creates a 'soulless' closed look.</p>	It is recognised that there are buildings and spaces of varying significance outside of the proposed area. The proposed boundary has been identified based on the most recent comprehensive significance assessment (2014) and options study (2019) set out in the designation assessment. We are satisfied that the proposed boundary meets the definition of the Act, the NPPF and HE Guidance Note 1. The designation assessment and options study recommends that he boundary is reviewed in line with good practice and national planning policy when the Local Plan is reviewed in five years' time to consider a further extension if necessary. Some comments appear to relate to the management of the area which will be set out in a detailed Conservation Area Management Plan. We will ensure these comments are considered in the preparation of the Management Plan.	No change required.
30/06 @17.23	Email	47	Kate Price		Support	Wholeheartedly support the designation of the new conservation area.	Support is welcomed.	No change required.

30/06 @ 18:23	Email	48	Jeremy Gould		Not completed	<p>Supports the principle of Conservation Area designation. Proposal relies too much on the Portico Report and challenges detailed assessments. Considers that option 4 seems to be based on what is deemed to be financially expedient and what is predicted to be public reaction, neither of which has much to do with the Abercrombie Plan or its architecture and spatial planning. Feels the City Council should be braver and lead with ideas.</p> <p>Considers the boundary is too tightly drawn. It should be simplified and less reactive to particular buildings as they are now and more sensitive to the Abercrombie Plan that the area is trying to protect. At the north-east corner it should stretch to the doors of the Armada Way Shopping Centre. At the south-west corner it should ignore the sub-standard hotel and run down the outer west side of the original Derry's Cross space to connect to the Athenaeum. At the south-east corner, suggests it might be sensible to include the Guildhall and St Andrew's Church as part of this Conservation Area rather than the adjacent one as they are 1950's buildings and are part of Abercrombie spaces. Most importantly, the north-west corner boundary should be extended to include the Pannier Market and Frankfort Gate. The boundary should include the outer building lines of the north side of Cornwall Street, all of Market Avenue, the south side of New George Street and all of the open space of Frankfort Gate up to Western Approach. Further detailed comments on significance assessment of Map 2 and Map 3.</p>	<p>The omission of the Listed Unitarian Church is noted and Map 2 will be updated. It is recognised that there are buildings and spaces of varying significance outside of the proposed area. The proposed boundary has been identified based on the most recent comprehensive significance assessment (2014) and options study (2019) set out in the designation assessment. We are satisfied that the proposed boundary meets the definition of the Act, the NPPF and HE Guidance Note 1. The designation assessment and options study recommends that the boundary is reviewed in line with good practice and national planning policy when the Local Plan is reviewed in five years' time to consider a further extension if necessary. Map's 2 and 3 are extracts from the 2014 Heritage Audit report by Asset Heritage, as updated by subsequent building Listings. They are provided as evidence to the proposed designation. The heritage significance of buildings and spaces will be revisited as part of the preparation of the Conservation Area Appraisal and Management Plan.</p>	No change required.
30/06 @ 19:29	Email	49	Penny Tarrant	Environment Plymouth	Not completed	<p>Requests that the boundary of the proposed designation is amended to include the whole of Armada Way public realm as far as North Cross as it is an important green space for the city with a number of benefits. It has some mature trees, which mitigate air pollution and help with surface water drainage. It would take a significant number of saplings to replicate this benefit. It is a significant wildlife corridor in an urban environment for pollinators, birds etc. Mature green space in a built-up area can contribute to a sense of health and wellbeing. It would help to make the city centre a more attractive residential area in the future. It is part of an historic cityscape, which should be valued as much as the built environment. It would be best to keep the whole of Armada Way together with the same level of protection.</p>	<p>It is recognised that there are buildings and spaces of varying significance outside of the proposed area. The proposed boundary has been identified based on the most recent comprehensive significance assessment (2014) and options study (2019) set out in the designation assessment. We are satisfied that the proposed boundary meets the definition of the Act, the NPPF and HE Guidance Note 1. The designation assessment and options study recommends that the boundary is reviewed in line with good practice and national planning policy when the Local Plan is reviewed in five years' time to consider a further extension if necessary.</p>	No change required.
30/06 @ 20:34	Email	50	Karl Parsons	Plymouth Royal Cinema Trust	Support	<p>Wholeheartedly support the designation of the new conservation area and are pleased to see that the proposal extends to the Royal Cinema and Athenaeum. The significance of the Royal Cinema has been recognised by the Cinema Theatres Association, The Twentieth Century Society and Historic England and the building forms and important part of the city's historic environment. The unique nature of the city centre would be protected by the designation and would encourage the conservation and continued use of the historic, architectural, social and economic assets which are its buildings.</p>	Support is welcomed.	No change required.

30/06 @ 22.14	Email	51	Karl Parsons		Support	<p>Supports the proposed Conservation Area. Suggests that as well as Britain's Ocean City, Plymouth needs to embrace its past and declare itself Britain's Twentieth Century City.</p> <p>Does consider it a pity that the proposed area isn't larger, taking in such buildings as Gaumont Palace, Colin Campbell House and the Pannier Market for instance. Further suggest that some of the significance assessments should be revisited, for instance the Athenaeum could be considered of greater significance than currently assigned due to its long history, architecture and position, along with the Royal Cinema. Notes that the Unitarian Church has been omitted.</p> <p>Overall feels the proposed designation is a positive step for the city and should be supported without reservation.</p>	<p>The omission of the Listed Unitarian Church is noted and Map 2 will be updated. It is recognised that there are buildings and spaces of varying significance outside of the proposed area. The proposed boundary has been identified based on the most recent comprehensive significance assessment (2014) and options study (2019) set out in the designation assessment. We are satisfied that the proposed boundary meets the definition of the Act, the NPPF and HE Guidance Note 1. The designation assessment and options study recommends that the boundary is reviewed in line with good practice and national planning policy when the Local Plan is reviewed in five years' time to consider a further extension if necessary.</p>	Update map 2 to show the Listed Unitarian Church as High Significance.
30/06 @ 22:30	Email	52	Sally Hall		Support	<p>Fully in support of the proposals to extend the conservation area to include the core Abercrombie area.</p> <p>Feels that the key sightline of Armada Way should be preserved and therefore would prefer Option 2.</p>	<p>It is recognised that there are buildings and spaces of varying significance outside of the proposed area. The proposed boundary has been identified based on the most recent comprehensive significance assessment (2014) and options study (2019) set out in the designation assessment. We are satisfied that the proposed boundary meets the definition of the Act, the NPPF and HE Guidance Note 1. The designation assessment and options study recommends that the boundary is reviewed in line with good practice and national planning policy when the Local Plan is reviewed in five years' time to consider a further extension if necessary.</p>	No change required.

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