

## STATEMENT 01

### City Centre & University AAP Public Examination

<b>Document Number:</b>	<b>PCC CC&amp;UAAP 01</b>
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<b>Title:</b>	<b>Does the AAP contain sufficient explanation of how the Preferred Approach is arrived at?</b>
<b>Examination Session:</b>	<b>26<sup>th</sup> January 2010</b>

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### **Issue to be Examined**

1. The Inspector has asked the question “Does the AAP contain sufficient explanation of how the Preferred Approach is arrived at?”
2. The Council considers that the City Centre and University AAP is sound as submitted. It believes that the primary task of an AAP is to provide the planning framework for areas where significant change is needed by identify the distribution of uses and their inter-relationships, including specific site allocations, and set out as far as practicable the timetable for the implementation of the proposals.
3. The explanation as to how the Council has evolved its approach to the future development of Plymouth City Centre is fully set out in a range of documents submitted alongside the AAP, including the evidence base studies. These documents are signposted in paragraphs 1.4 to 1.10 of the submitted AAP. This background paper itemises these supporting documents in greater detail.
4. The Council believes that the appropriate place for a discussion of how the preferred approach was arrived at is in the supporting documents, leaving the AAP to set out the strategy and policies. This approach has been used in past Local Development Documents and has been followed in the City Centre and University AAP.

### **The Council’s Approach**

5. The Council has taken the view that the revisions to the Local Development Framework Regulations in 2008 and 2009 created an opportunity to present the story of how a preferred approach was arrived at in documents submitted alongside the AAP. This approach allows the Council to submit an AAP which succinctly sets out and justifies the strategy and policies for the AAP, without making it overly long by having to include a detailed description of all the matters that have been assessed, options that have been considered and procedures that have been undertaken in preparing the AAP. The AAP as submitted is therefore the AAP which the Council believes should eventually be adopted.
6. However, to ensure every reader of the AAP is aware of all this supporting information, paragraphs 1.4 to 1.10 of the submitted AAP, marked ‘To be deleted on adoption’, together with the list of evidence base documents that the AAP relies on, have been included to signpost the reader to where they can be found. In addition all these documents are posted on the Council’s web site and referenced from the City Centre AAP page.

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7. With reference to the particular question as to how the Council's Preferred Option has been arrived at, paragraphs 1.4 to 1.10 of the submitted AAP summarise the key outcomes from the Issues and Preferred Options consultation stage (2008). It was felt that this would be useful to readers given that the City Centre and University AAP is the first DPD in Plymouth which has been produced using the new LDF regulations. Greater detail as to what was considered at this stage is obviously set out in the supporting Issues and Preferred Options consultation document and its supporting document which reported on the matters raised during the consultation process.

### **Key Documents Setting Out The Story**

8. There are a number of key documents submitted alongside the AAP which set out how the Council arrived at its preferred strategy. These are either documents which set out how the approach was arrived at, or documents which set out the detailed considerations and deliberations which lead to the preferred approach.
9. The documents which set out how the approach was arrived at, are:
  - The Final Sustainability Appraisal (FSA). The FSA has been used throughout the process of producing the AAP to provide a commentary on the various options which have been considered, and an analysis of those options against SA indicators. Although the FSA sets this analysis out with regard to the submitted AAP, it should be noted that previous SAs contain analyses relevant to earlier stages in the process.
  - The Regulation 30 Statement. This statement was prepared by the Council and submitted alongside the AAP and contains a complete description of all the stages the Council has gone through to produce the AAP since 2005. It also sets out the representations which were received at each stage, and a commentary from the Council setting out how issues have been considered.
10. The key documents which set out the issues, options and considerations which the Council used to arrive at its preferred approach are set out below. It should be noted that many of these documents, in turn, refer in detail to further evidence base documents.
  - City Centre and University AAP Issues and Options Report (2005). This consultation started the process of producing the AAP, introducing some key concepts and the Vision for Plymouth. It also fed into the process of producing the Core Strategy.

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- City Centre and University AAP Issues and Preferred Options Consultation Document (2008). This consultation acted as a milestone event to present the issues which the Council had identified as being important for the AAP to address, and to introduce possible preferred approaches. It did not take the form of a draft AAP, but was a full discussion of the evidence gathered to date and of what approaches the Council could choose to take to address those issues.
- City Centre Sites Newsletter Consultation (May 2009). This consultation set out potential approaches the Council could take to specific sites in the City Centre. It was an opportunity for City Centre residents and businesses to comment on potential site specific policies.
- City Centre and University AAP Pre-Submission consultation (August 2009). This consultation was the first time a draft AAP was published (in accordance with the revised LDF regulations). A full set of evidence base documents, along with the Sustainability Appraisal and Regulation 28 Statement was published alongside the AAP to enable people to comment on the process and options which had been used to develop the AAP.

### **Additional Information**

11. It should be noted that at previous Examinations into Plymouth's LDF documents, the Council has argued that details of procedure, process and explanation of how the strategy has been developed should not appear in the final, adopted DPD – as this make the final document far too long and cumbersome to use. The approach the Council has taken previously has been to set out procedural details and explanations in the submitted DPD in greyed out boxes marked 'To be deleted on adoption'. This approach has been accepted in the past. The revisions to the LDF regulations have clearly attempted to streamline the process of producing DPDs. The Council believes that these alterations have created an opportunity to move the procedural details and explanations into the Regulation 30 statement and Final Sustainability Appraisal, where the story of how a DPD has been created can be explained in more detail. This approach also means that the submitted AAP bears more resemblance to the document that may eventually be adopted.
12. It should also be noted that the Council's used the FSA to explain the options which have been considered, and why certain options are more acceptable than others, as part of the process of evolving the City Centre and University AAP. This approach has been complimented by GOSW.

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### **Conclusion**

13. The Council believes that the AAP and its supporting documents contain a full and comprehensive discussion of how the preferred approach set out in the AAP was arrived at. The detail supplied is clear, detailed, and goes beyond the requirements of the regulations. The Council therefore believes that the AAP is sound.