

STATEMENT 03

City Centre & University AAP Public Examination

Document Number:	PCC CC&UAAP 03
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Title:	Does the AAP justify its encouragement for more intensive development in relation to the impact on townscape and heritage assets? How will more intensive development affect the key attributes of the Abercrombie Plan and the existing City Centre?
Examination Session:	26th January 2010

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Issue to be Examined

1. The Inspector has asked the question, “Does the AAP justify its encouragement for more intensive development in relation to the impact on townscape and heritage assets? How will more intensive development affect the key attributes of the Abercrombie Plan and the existing City Centre?”
2. The Council believes that the City Centre and University AAP is sound as submitted. In relation to the AAP's strategy regarding the City Centre's heritage and townscape and the impact of the changes set out in the AAP, the Council believes that the following points are relevant:
 - The Plan is founded upon a robust evidence base, which includes several pieces of work analysing the importance of the City Centre's heritage, including Cushman's “Future Direction Investment & Development Strategy” which demonstrates how the most valuable elements of the historic environment can be integrated with the proposed intensification, and a report by the City Council which brings together the conclusions of all these separate studies.
 - The Council has developed an approach which it believes integrates the most valuable parts of the City Centre's heritage with quality new developments which will put right some of the problems which compromise the City Centre's long term future so as to create vibrant new districts. The old and the new will combine to create a uniquely attractive centre which becomes the regional destination for the south west peninsula. It is not, therefore the case that there is a choice of either having more intense, commercial development or respecting the City Centre's heritage. The AAP demonstrates that a renewed City Centre can be planned which successfully integrates heritage with quality new development and that a failure to do so will compromise the city's long term prosperity.
 - The Plymouth Core Strategy clearly sets out targets for new retail floorspace and office floorspace. The Core Strategy also sets out that the bulk of the new retail floorspace should be provided in the City Centre, and that the Waterfront is a priority area for the location of new employment floorspace. The AAP could not deliver these Core Strategy objectives without proposing an intensification of activity in the City Centre. It is important to note, therefore, that if the AAP did not show an intensification of uses to deliver the floorspace targets, it would not be in conformity with the Core Strategy.
 - The Council has developed this approach by listening to the views of organisations and individuals at previous consultation stages and

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modifying its approach to improve its strategy. This was particularly the case at the Issues and Preferred Options stage when the Council was criticised by a number of people and organisations for pursuing a strategy which was too commercially orientated.

- The Council believes that although an AAP is a document whose role is to deliver change, it is still at a strategic stage of the planning process. The AAP needs to be seen in the context of a sequence of documents which gradually increase the detail of the guidance being provided, starting with the Vision for Plymouth and the Core Strategy, and progressing through the AAP and on to masterplans, site briefs and delivery plans. Some of the detail which will address the specific and detailed potential impacts on the City Centre townscape and heritage will only be developed at these later stages. The AAP, however, sets the principles and policies which these later detailed documents will rely on.
- Although this approach is set out in the AAP, it is accepted that it could be further clarified. The Council have therefore suggested some alterations to the AAP which the Inspector may wish to recommend as a clarification of the document.

Area Action Plan Evidence Base

3. The Council's understanding of the impact of the strategies and proposals set out in the AAP on the City Centre townscape and heritage is founded upon an extensive and robust evidence base. This evidence base includes studies of the City Centre heritage, of the ways in which a commercial City Centre redevelopment could blend with the City Centre's heritage, and of the potential ways in which the strategic proposals could integrate with the rest of the existing City Centre. From a synthesis of this evidence, the Council has developed the AAP strategy.
4. It should be emphasised that the Council's strategy does not seek to 'trade-off' heritage assets against modern, commercial development. It clearly is a strategy which will cherish the City Centre's heritage, the legacy of the Abercrombie Plan, but within this context promote new quality developments that will help to revitalise and renew the City Centre. This approach is based on the following evidence:
 - “Plymouth Planned: The Architecture of the Plan for Plymouth 1943 – 1962”, by Jeremy Gould
 - “Plymouth Waterfront Characterisation Study” Alan Baxter & Associates 2006
 - “City Centre Precinct Urban Design Statement”, Plymouth City Council 2002

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- “Vision for Plymouth”, Mackay, Zogolovich and Harradine, 2004
 - “Plymouth City Centre Future Direction Investment and Development Strategy”, Cushman and Wakefield, 2008
 - “Plymouth City Centre Precinct – Assessment of strategic options for the management of its heritage assets”, Plymouth City Council 2008
 - “North Cross Design Framework”, Form Design Architects Group, 2008.
5. The key studies are the City Council's assessment of strategic options for the management of the City Centre's heritage assets, and the Future Direction Investment and Development Strategy. The former document explains the importance of each of the heritage assets in the City Centre, based on an analysis of the previous studies by Mackay, Zogolovich and Harradine, Jeremy Gould, Alan Baxter and Associates and Cushman and Wakefield. The second document explains how it is possible to integrate a succession of new developments within the Abercrombie Plan which will enhance and strengthen its most valuable characteristics and the most important heritage assets in the City Centre.

The Approach set out in the AAP.

6. The AAP sets out a comprehensive approach to the City Centre's heritage, building on its understanding of the historic environment as set out in the Evidence Base. The AAP sets out an approach which:
- Clearly sets out the importance of the City Centre's heritage and the role it should play in a renewed City Centre (paragraphs 2.8 – 2.9)
 - Sets out a vision for how the Council sees the City Centre heritage working with the new, more intense areas of development to create a coherent and engaging City Centre (paragraphs 3.4 – 3.6),
 - Identifies the most important and valuable heritage assets in the City Centre and sets out how they will be protected and integrated into the renewed City Centre (Strategic Objective 2, Policies CC01, CC02, CC03 and CC07). The AAP clearly sets out that the key heritage assets are the beaux arts street grid laid out by the Abercrombie Plan, and the high quality buildings lining the north side of Royal Parade. The AAP sets the principle that these parts of the historic environment and townscape should be conserved and enhanced as a monument to the City's history in a renewed City Centre,
 - Recognises that some parts of the Abercrombie Plan have not been implemented in the way intended and are of a much lower quality than others (paragraph 2.2). These parts of the City Centre have few if any

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buildings of quality, and their only heritage value is in the relation of the blocks to the street grid. It is in these places that the AAP locates some of the most intense, most important new development (Proposal CC11), but in a way that still respects the original Abercrombie grid.

- The AAP also recognises the importance of caring for and promoting the public realm which makes up the Abercrombie Grid, and particularly the main boulevards of Armada Way and Royal Parade. The AAP therefore sets out policies to guide the future improvement of the public realm and these streets in a way which will show off the heritage of the City Centre and will respect the townscape created by the Abercrombie Plan.
7. It should be noted that although the AAP does contain policies which aim to deliver a renewed City Centre with more intense commercial developments in some parts of the City Centre, it does not advocate these changes at the expense of the City Centre's heritage and townscape. The AAP aims to balance all of the issues which need to be addressed in the City Centre, and to ensure that its approach integrates and respects the City Centre's heritage with the changes. Indeed, the Council aims to make the City Centre's heritage a key component and asset of the renewed City Centre that will continue in the future. The approach set out above contains the principles and priorities to deliver this. In particular, the approach set out in the AAP has been deliberately developed to replace poor quality buildings which detract from the overall attraction of the City Centre and the Abercrombie Plan, and replace them with high quality new developments, which will be required to respect the principles of the City Centre's heritage and will strengthen the beaux arts grid of streets.
 8. It is important to note, however, that there are significant problems with the way the City Centre functions as a commercial destination, which could threaten its future success. In particular, as set out in paragraph 2.12 and Figure 2, the City Centre footprint is the same size as that of Liverpool and Manchester, yet the intensity of development is much lower than in those city centres. In Plymouth, this leads to activity being stretched too thin across large parts of the City Centre. The problems threatening the City Centre are set out in detail in the 'Future Direction Investment and Development Strategy' and are also summarised in the Issues and Preferred Options Document and in paragraphs 2.11 – 2.15 of the AAP. It seems clear that if these problems are not resolved that the City Centre will be unable to maintain its current levels of activity, let alone raise its profile to a regional destination as set out in Strategic Objective 1, or deliver the increase in retail and office floorspace required by the Core Strategy. Clearly, a declining City Centre would also pose problems for the Council trying to maintain and celebrate the City Centre's heritage.

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The AAP has therefore had to devise a strategy which promotes both the City's heritage and which puts in place quality developments which will resolve the problems the City has at the moment and which could compromise its future. This whole debate is summarised in Chapter 2 of the AAP and leads to the strategy set out in Chapter 3.

9. It is therefore considered that the AAP, and its evidence base, contains a strong understanding of how the City Centre can be renewed using both the valuable heritage and townscape of the Abercrombie Plan and the beaux arts street grid, and the introduction of exciting new, quality commercial developments which will increase the density and the variety of activities which can be experienced in a 21st Century City Centre.

Development of the Approach

10. The approach of the AAP, as set out above, has been developed over a number of years, and has been refined using views expressed by a number of stakeholders during consultation events. As set out in the Regulation 30 Statement, the AAP has been subject to a number of consultation events between 2005 and 2009. Perhaps the most notable of these was the City Centre and University AAP Issues and Preferred Options Consultation Document, published in October 2008. This document is included in the Evidence Base. It was not a draft plan, but instead was a discussion of the issues identified to be addressed in the AAP and a suggestion of some options for the strategy the AAP should set out.
11. Some respondents commented that the consultation document was too heavily weighted towards commercial considerations, and gave the impression that the need to conserve the historic environment could be 'traded off' against the need to encourage commercial development. In part, this was because of the need to set out the findings of the Future Direction Investment and Development Strategy which had highlighted the commercial weakness of the City Centre. The Council, however, recognised that it needed to clarify its overall approach to the historic environment and to conserving and enhancing those features that are important in terms of the City Centre's heritage, and has done so in the Submission draft AAP.
12. The most useful comments were received from English Heritage and from the Plymouth Architectural Trust. The Council took these comments on board and used them to develop the approach that has now been set out in the Submission draft AAP. The Council particularly used comments from a number of stakeholders urging it to set out clearly its vision for the City Centre and for how the heritage would form an integral part of any changes, and to set out what it considered to be the most valuable

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heritage assets and how they should be conserved. It has also attempted to explain in much more detail what it sees as the relationship between the renewed City Centre and its heritage.

13. The Council also held a number of workshops with CABE towards the end of 2008 to improve its understanding of the City Centre heritage, and met with English Heritage prior to publication of the Pre-Submission draft of the AAP to explain the approach it was taking. At each of these events, the Council took note of the views of stakeholders and attempted to integrate them into its approach.
14. The Council therefore considers that the approach set out in the AAP is the product of extensive engagement and consultation with stakeholders, and represents a strategy which effectively takes account of all the issues which need to be addressed in the City Centre and has successfully synthesised them into a coherent and balanced approach.

Role of an AAP and Approach to More Detailed Strategies

15. As set out in paragraph 12.6 of the AAP, the Council sees an AAP as being a document which is delivery focused but which is still pitched at a strategic level. The Council sees an AAP as a document which sets out principles and priorities, providing a framework for change. It does not see an AAP as “Blue Print Planning” based on a detailed design framework or masterplan for change in the City Centre. Such a level of detail would lead to a lengthy and unwieldy document, which would not create a flexible framework for change over a long period of time. It does not seem sensible to attempt to set out very detailed design principles for a development which may not reach the planning application stage for over 10 years. The Council's understanding of the delivery process for such large scale City Centre developments set out in the Future Direction Investment and Development Strategy has led it to this conclusion.
16. The Council has therefore developed an approach, summarised in paragraphs 12.6 and 12.7 of the AAP, which places the AAP in a sequence of documents which progressively increases the amount of detailed guidance relating to the City Centre. This sequence of documents can be seen as starting with the Vision for Plymouth, continuing into the Core Strategy and moving past the adoption of the AAP to the creation of more detailed masterplans, site briefs and Delivery Plans which will explain how the principles and policies of the AAP should be implemented. This approach avoids the creation of inappropriate levels of detail being set out at too early a stage.
17. It seems clear from the current objections, however, that the Council has not explained this approach in sufficient detail in the AAP. This

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misunderstanding of the progression of documents needed to deliver major change has clearly generated concern amongst a number of respondents, regarding a variety of issues. The most notable of these has been the comments, chiefly submitted by English Heritage, expressing concern over how the AAP will ensure that its aspirations for the City Centre's heritage will be achieved. Essentially, their points come down to, how can we comment on the acceptability of the AAP proposals if we don't know what the City Centre will look like in 15 years, given the objectives adopted by the AAP.

18. Part of the answer to this is that the AAP contains policies which will ensure the Council addresses the issues of the City Centre heritage in the future, by marking its importance and setting out how the historic assets should be prioritised. However, English Heritage point out that the AAP does not set out the detail of how the Council will develop these principles over the life of the Plan to ensure everyone understands how the AAP proposals will eventually be implemented. The same principal applies to other parts of the AAP that the Inspector has asked questions about, for example the amount of housing to be provided by the plan, the mechanism for providing affordable housing, the provision of infrastructure and delivery of key sites, and other matters of detail pertinent to the AAP proposals.

19. However, the Council believes that the AAP is sound as submitted. It contains the policies and proposals to provide a framework for delivering a renewed City Centre, it is based on sound evidence, and the principle of 'layers' of plans and information is well accepted in terms of how an LDF should be assembled. This is set out briefly in Chapter 12 of the AAP. However, it is accepted that this principle could be explained at greater length in the AAP, and the Council could clarify what additional strategies will be produced, by when, and what status they will have. This would undoubtedly help improve people's understanding of the AAP and address a number of the issues flagged up by the Inspector. A number of points of clarification are therefore recommended in Appendix A.

Conclusions

20. The Council believes that the City Centre and University AAP is sound:

- It is founded on a robust and extensive evidence base which sets out all relevant considerations. The evidence base contains a key document which combines the findings of all the studies of the City Centre's heritage which have been used to produce the AAP.
- It sets out a strategy which includes the intensification of development in parts of the City Centre, which is necessary to deliver the objectives

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and targets of the adopted Core Strategy.

- It sets out an approach which is clear about the relationship between the City Centre's heritage and the new development which will spearhead the renewal of the City Centre. It does not set out a strategy which encourages new development at the expense of the historic environment. It sets out an approach which combines quality new development with the best of the City Centre's heritage to produce a renewed and integrated City Centre worthy of Plymouth's important role in the far south west.
- The approach has been developed through extensive engagement and consultation with stakeholders which has led to a strategy which can be clearly seen to have evolved over successive consultation documents in response to comments.
- The approach is firmly grounded in the Council's understanding of the role of an AAP and the amount of detail which should be included in such documents. Clarifications to the AAP have been set out for the Inspector to consider, if he believes the AAP could be improved by their incorporation. These changes do not affect the Council's judgement that the AAP is sound.

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Appendix A

New paragraphs to be inserted following paragraph 3.15 of the AAP, after the title (old paragraph 3.16 retained and used after the added section)

How Will the AAP Deliver This Vision?

3.16 An Area Action Plan is part of a Local Development Framework, providing the planning framework for areas where significant change is needed by identifying 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.. It is essentially, however, a strategic plan. While it contains more detail and site specific policy than a Core Strategy, it should not contain an inappropriate level of detail and stray into the masterplanning of individual sites. Evolving the detail is something which should be undertaken as part of the process of developing and delivering individual proposals, based on the guiding principles set out in the AAP.

3.17 The City Centre and University Area Action Plan is clearly a key part of the Plymouth Local Development Framework. It sets a vision and a framework to deliver the Core Strategy aspiration of a renewed City Centre by 2026. It does this by setting out strategic objectives, policies and proposals which should be used as guidance for all development which will contribute to the renewed City Centre. It is not, however, a 'Blue Print' for development, but rather guidance to show how the Council wants to see its objectives implemented. The AAP should be seen as one stage in a sequence of plans and strategies which will lead from the Vision for Plymouth through the Core Strategy and AAP to the delivery of fully realised developments. Once the AAP stage has been put in place, a number of more detailed delivery plans will be developed to amplify key aspects of the Council's vision for the City Centre. This AAP must be seen in this context, of being one step along the path to delivery.

3.18 This approach means that the AAP is a practical, manageable and flexible document. It sets the parameters for later masterplanning exercises, site briefs and delivery plans to use, and ensures that development proposals which may not come to implementation until the end of the plan period are not shackled by inappropriate levels of detail at too early a stage. At the same time, it puts in place policies and principles at an appropriate level of detail to ensure that key objectives are flagged up as important at an early stage and will be used to shape the development process. For example, the AAP is clear that place making is a key consideration for any City Centre developments, and that the City Centre's heritage and quality of buildings and public realm will be important considerations throughout the development process.

3.19 The next layer of detailed guidance, that will come after the AAP is adopted, will expand on these themes and provide more detailed information and

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advice relating to how proposals should be developed. Individual site briefs and delivery plans will be prepared as a further layer of detail, setting out detailed masterplanning principles for individual development opportunities. All of these must comply with the principles set out in the AAP.

3.20 These principles can be understood using a diagram:

When	Document	Who
2004	Vision for Plymouth	PCC/LSP
2007	Core Strategy	PCC
2010	City Centre and University AAP	PCC
2010/2013	Detailed City Centre Strategies: - Public Realm Delivery Plan - Urban Design and Heritage Assets Strategy - Strategic Road Network Management Plan - Plymouth Uni Masterplan - Plymouth College of Art Masterplan - Plymouth Delivery Framework – City Centre Sites - Plymouth SHLAA/City Centre Housing Delivery Plan	PCC/Stakeholders
2011 – 2015	Individual Site Briefs: - Site Masterplanning - Public Realm Schemes	PCC/Stakeholders/ Dev't Partners
2015 – 2021	Individual Planning Applications – Strategic Proposals	

3.21 In accordance with these principles, the AAP therefore sets out policies and proposals in the following way: (As existing paragraph 3.16)

Alterations to Chapter 12: Delivery, paragraph 12.7

12.7 The City Centre and University AAP therefore occupies one layer in the sequence of guidance which the City Council will use to deliver change in the

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City Centre. This approach is set out in detail in Chapter 3 of the AAP.

12.8 The Council will produce further guidance and strategies, and give them appropriate status, in accordance with the following schedule:

Public Realm Delivery Plan		
2010-2013	This will be a Plymouth City Council document which will build on the provisions in Policy CC03 of the AAP. It will set out detailed principles for the design of public realm improvements throughout the City Centre, and set out detailed schemes for key places such as Armada Way, Old Town Street and Royal Parade. It will also set out costed schemes for these parts of the public realm so that projects can be undertaken as funds become available.	PCC Plan developed with input from key stakeholders. Could be SPD.
City Centre Urban Design and Heritage Assets Strategy		
2010-2013	<p>This will be a Plymouth City Council document which will resolve 2 issues:</p> <p>Firstly it will bring together existing work (already present in the AAP evidence base) to present a thorough analysis of the quality of urban design and the value of heritage assets (Identifying those non listed buildings it is proposed to keep and those listed buildings it wishes to be renovated) in the City Centre, within the framework and context set by the AAP. To this end it will express how the regeneration of the centre through the issues of retail, office, housing, movement/transport and public realm will be progressed and integrated in the context of the historic environment.</p> <p>Secondly it will present a set of guidelines through the use of design coding for future development to respect which will demonstrate how the objectives of the AAP can be implemented in a way which uses the most suitable urban design principles and conserves, enhances and uses the City Centre's heritage to create a unique and distinctive place.</p> <p>It may therefore be appropriate to adopt this strategy as an SPD.</p>	PCC Strategy, could be SPD.
Strategic Road Network Management Plan.		
2010-2013	This will be a document prepared by the City Council's Transport Strategy team and will have strong links to both the LDF and LTP3. It will also have a strong relationship to the City Centre Urban Design and Heritage Assets Strategy, so that the importance of links across the road, of key nodes	PCC Strategy adopted under the LTP3 (with involvement

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	along the road network, and of the quality of the environment along the road network can be examined. The Strategy should include guidelines and principles to be used as improvements to the strategic road network are made, either as part of transport lead projects or development proposals in the AAP.	from key stakeholders)
Plymouth Delivery Framework – City Centre Sites		
2010/2013	The Plymouth Delivery Framework is the name given to the City Council's system for understanding and influencing the delivery of the projects which are key to the delivery of the City growth agenda. This part of the Framework will examine the City Centre strategic proposals and the relationship with key pieces of infrastructure, using information already set out in the AAP evidence base.	Plymouth City Council internal document prepared with input from key stakeholders.
Plymouth SHLAA/City Centre Housing Delivery Plan		
2010-2013	The Plymouth SHLAA was published in early 2010. Although not specifically a part of the evidence base of the AAP, it does have a bearing on the delivery of City Centre sites. As part of the future rolling annual update of the SHLAA, attention will be focused on City Centre sites so that the Council can influence and respond to City Centre proposals which could include an element of housing.	Plymouth City Council document with input from SHLAA panel and PCC Housing Department.
University of Plymouth Masterplan/Plymouth College of Art Masterplan.		
2009/2010	These documents already exist and are part of the AAP evidence base. They set out in detail the masterplanning principles and proposals for the University and the College of Art. As part of the suite of documents which set out how the City Centre will change, they should be read as guidance as to how the City Council and its partners will apply the policies in the AAP. The City Council will explore whether it would be appropriate for these documents, or versions of them to be adopted as SPD.	UoP/PCA/PC C documents, could possibly be adopted as SPDs.
City Centre Site Briefs		
2011-2015	These documents will be prepared under the Core Strategy, AAP and the above strategy documents to set out how individual City Centre schemes should be implemented. They should include all possible elements of a scheme which should be commented on, including design, relationship to the City Centre and historic environment, elements of housing and potential affordable housing and scheme viability. It is anticipated that they would be prepared in partnership with a developer, who may be the Council's formal development	PCC/future development partner documents. Adopted as SPD?

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	partner for relevant schemes.	
Public Realm Scheme Masterplans.		
2011-2015	These documents will be the detailed plans for public realm works, building on the schemes set out in the Public Realm Strategy. They will therefore be the final vehicle leading to implementation and will be prepared once funding for schemes has been secured, either through Council capital funding or by public realm works being undertaken as part of a development proposal. It may be appropriate for these masterplans to be adopted as SPD.	PCC documents prepared with input from development partners and key stakeholders. May be appropriate to adopt as SPD.

Changes resulting from discussions with English Heritage which the Council is happy to accept:

- 1 Policy CC03, Bullet point 10, replace with the following:
 “Explore ways to provide cover over the main shopping streets *that is consistent with the character of the City Centre* and incorporate (as existing policy)”
 This Policy bullet point will need to be amplified in the supporting text by explaining that the way this should be achieved is explained in the supporting Adopted Design Guide SPD and evolving Development Guidelines SPD

- 2 Deletion of elements of paragraph 8.9

“8.9 The final design, form and mix of uses will be evolved over the plan period. It is anticipated that the lead in time for a scheme of this size will be at least 10 years. During that time the City Council will be considering the most appropriate delivery mechanism, given that it owns the freehold of the site. ~~As the delivery mechanism is implemented, the proposal site is flexible enough for the final scheme to be designed to meet the needs of the City Centre, retailers and other occupiers at that time. The proposal in this AAP sets out the minimum requirements which must be delivered on this site to enable the aims of the AAP and of the City Growth Strategy to be met.~~”

Deletion of elements of 12.6

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“12.6 The approach taken in this AAP is to set out the Council's aspirations for change in the City Centre, to set out the broad strategic approach which should be followed over the plan period, and to 'point a finger' at the sites which will be key in delivering the change. It has done this by developing a comprehensive understanding of the factors which will influence how and when development can be delivered in the City Centre. The AAP does not set out to create a detailed design framework or masterplan for change in the City Centre. ~~This is because the detailed planning and design of individual schemes needs to respond to the needs of retailers and investors at the time of delivery, and needs to be able to take advantage of the latest thinking about City Centre developments and sustainability.~~ Since some of the developments are unlikely to be implemented for at least 10 years, the AAP needs to set out a flexible approach to each site, ~~which does not prescribe the detailed form of development, and which allows the detail to evolve as the delivery process goes on.~~”