**STATEMENT 06**

City Centre & University AAP Public Examination

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Issue to be Examined

1. The Inspector has asked “Are the diagrams and Proposals Map sufficiently clear?”

2. The Council believes that the City Centre and University Area Action Plan is sound as submitted. The diagrams contained in the AAP illustrate the key issues which the AAP needs to address, and represent some quite technical concepts in clear ways. The Council also believes that the submission Proposals Map clearly shows the policies and proposals contained in the AAP.

3. The Council does not believe that the AAP requires more diagrams in order to explain the strategy, policies and proposals set out in the AAP. It is, however, the presentation of the adopted AAP will be improved in its final published form, so that it includes more illustrations and is a more visual document. Examples of the sort of changes envisaged to the diagrams and Proposals Map are appended to this statement. These changes do not affect the content, policies or proposals of the AAP.

4. The Council accepts that it has experienced difficulties in producing a fully interactive adopted Proposals Map on its website. There is, however, an interactive Proposals Map on the website, albeit that it is only at the most basic level to meet minimum statutory requirements, which can be interrogated and linked to the adopted policies and proposals. The Council is in the process of overcoming the technical difficulties it has experienced in developing a fully interactive mapping facility, of an suitable quality to match the Council’s other LDF achievements.

Clarity of the Area Action Plan Diagrams

5. The AAP contains a number of diagrams intended to explain and clarify some of the issues and challenges being addressed by the Strategy. These diagrams are mostly found in Chapters 2 and 3 of the AAP. It should be noted that the illustrations found at the start of Chapters 4 to 11 are simply intended to illustrate the area being considered in that chapter, and do not refer directly to policies or proposals. However, enhanced versions of these diagrams have been included as an appendix to this statement, to illustrate the type of improvements envisaged in the final adopted document.

6. The AAP is based on a great deal of frequently complex and technical information, found in the evidence base. Previous versions of the AAP, and in particular the Issues and Preferred Options Consultation Document, have set out the evidence in greater detail. In the submitted AAP, the amount of technical detail and explanation has been reduced
and summarised, for the sake of clarity, so that the emphasis of the
document is on the Council’s strategy and proposals for the City Centre.

7. It should also be noted that much of the information in the evidence base
is visually presented. The diagrams which are presented in the AAP are
taken from the Evidence Base, they are briefly explained in the text and
the relevant evidence base documents are referenced. If an individual
wishes to investigate the detail of how a particular issue has been
evidenced, it is a straightforward matter to find this information, particularly
using the Council’s LDF web site.

8. There have been several comments made, most notably from English
Heritage and the Plymouth Architectural Trust, that the AAP should
contain more detailed diagrams. The following points can be made here:

- It has been set out elsewhere that the Council does not believe that
detailed masterplanning and urban design statements are an
appropriate level of detail for an Area Action Plan. An AAP is a
strategic document setting out broad principles. Detailed design
and masterplanning should be the next level of planning to be
carried out after the AAP is adopted, and this will be the time /place
where detailed analysis is used to examine how the AAP’s
objectives and proposals are to be delivered. This approach is set
out in Chapter 12 of the AAP and is expanded on in the Council’s
Statement 02.

- It is recognised, however, that the final adopted AAP needs to
capture the excitement and potential of the plans for the City
Centre’s renaissance. For this reason, the Council intends to make
the published AAP a more visual document, using illustrations,
pictures and mock ups to show what the City Centre of the future
could offer visitors, residents and workers. These would not be
intended to show precisely what development would look like, as
this would be a level of detail which the Council would expect to be
worked up through the detailed masterplans and site briefs to be
prepared at the next stage. These illustrations would be purely
presentational and in no way prescriptive as to how the AAP
proposals should be implemented in detail. For this reason, the
Council does not believe that the use of illustrations in this way
should have a bearing on the Inspector’s judgement regarding the
soundness of the AAP.

- It is also for this reason that the Council chose not to include such
illustrations in the Pre-Submission or Submission drafts of the AAP.
Using such illustrations can give people the impression that the
AAP proposals will be implemented in the way shown in the
illustration. This can lead to comments on the detail of the illustrations, rather than on the principles and policies which are actually being proposed. The Council wished to avoid causing such confusion, and to ensure that the comments received at Pre-Submission related directly to the proposals of the AAP.

The Proposals Map

9. The Council recognises that it has experienced a series of technical difficulties in producing an interactive Proposals Map of a standard to match its work on the Local Development Framework. In the past, this may have made it difficult for people to see how the proposals in an AAP might fit into the overall strategy for the City.

10. When the City Centre and University AAP was submitted, the Council had published an adopted Interim Proposals Map as an Adobe Acrobat (pdf) document on its website. This enabled individuals to compare the submission City Centre and University AAP Proposals Map with the adopted Proposals Map and, in particular, to understand the relationships with the adjacent areas.

11. The Council is in the process of publishing its fully interactive LDF mapping system on its website. It will continue to develop the functionality and usability of this system so that it becomes a new and more user friendly way for people to engage with the LDF. On adoption, the City Centre and University AAP Proposals Map will be added to this system.

12. The Council believes that the submission Proposals Map is sufficiently clear. It sets out the policies, proposals and relevant constraints which make up the City Centre and University AAP. It will be necessary to alter the colours and fills of some of the policy areas and markings to ensure that it is consistent with the scheme used in the interactive Proposals Map. These changes, however, are cosmetic and presentational and do not affect the policies and proposals themselves.
Conclusions

13. The Council believes that the City Centre and University Area Action Plan is sound as submitted.

14. The diagrams and Proposals Map are sufficiently clear for the following reasons:

- The diagrams are appropriate for the strategic nature of an AAP. They clearly link to the evidence base where the greater detail can be found.

- Further layers of detail and analysis will be carried out in masterplanning and site briefs to be produced following the adoption of the AAP. More detailed and analytical diagrams will be produced at this stage, based on the strategy, polices and proposals set out in this AAP.

- The final, adopted AAP will contain more illustrations and graphical material intended to create a more accessible and engaging document. However, it will also be made clear that these illustrations are not intended to be seen as an exact replication of the Council’s vision of how the AAP proposals should be implemented, but rather just one way in which it could be implemented.

- The submission Proposals Map is clear and shows the application of the Council’s policies to the City Centre and University AAP area. On adoption it will be added to the adopted Proposals Map and will be accessible using the Council’s interactive LDF mapping system.
Chapter 4: A Regional Destination
Chapter 7: The West End - the Market and Independent District
Chapter 8: The Core Retail District
Chapter 9: The Northern Office District, North Cross and the Railway Station
Chapter 10: The Learning and Culture District
Chapter 11: The Leisure and Civic District