

PLYMOUTH CITY COUNCIL

Subject: Derriford and Seaton Area Action Plan: Examination Inspector's Report

Committee: Cabinet

Date: 11 February 2014

Cabinet Member: Councillor Vincent

CMT Member: Anthony Payne (Strategic Director for Place)

Author: Jonathan Bell, Head of Development Planning

Contact details: Tel: 01752 304353
email: jonathan.bell@plymouth.gov.uk

Ref: JAB

Key Decision: Yes

Part: 1

Purpose of the report:

The Public Examination (PE) into the Derriford & Seaton Area Action Plan (AAP) took place in March 2013. The Planning Inspector's final report into this PE was received in August 2013. Although the Inspector did not dissent with the thrust of the evidence which supports the need to create a new heart for northern Plymouth and found there to be robust and commendable elements within the AAP, his overall final conclusion - having regard to the tests of soundness set out in the National Planning Policy Framework - was that the Plan is not sound.

The Inspector identified five primary reasons for this judgment. Namely, he felt that the AAP:

- Fails to have adequate regard to the close proximity of the currently disused Plymouth Airport and the effects that the potential use of this significant site could have upon the form and location of development within Derriford and Seaton;
- Is not supported by up to date and adequate economic evidence which justifies the location of the District Centre upon the Plymouth International Medical Technology Park;
- Is not supported by adequate evidence that demonstrates the timely deliverability of key sites across the Plan period;
- Is not supported by evidence to indicate that the timely modal shift necessary to ensure transport infrastructure will be able to accommodate the development proposed within the area can be secured;
- Is not supported by evidence that the transport infrastructure shown within the Plan is deliverable in a timely fashion.

As a result, the Inspector has recommended non-adoption of the AAP.

The purpose of the report is to consider the implications of the Inspector's report and to determine what course of action should now be taken by the City Council, including deciding whether or not the AAP should now be withdrawn.

The Brilliant Co-operative Council Corporate Plan 2013/14 -2016/17:

The report is significant in relation to the Growing Plymouth objective of the Corporate Plan.

The Derriford & Seaton AAP was intended to be the key strategic delivery document to drive the huge growth potential of the north of Plymouth. The scale of growth planned for is particularly significant in the context of the wider Plymouth growth agenda, including:

- 2,950 new homes (about 10% of the Core Strategy's overall target of 32,000) of which 765 would be affordable (over 20% of the Core Strategy's overall target of 3,300)
- 8,000 new jobs (about 30% of the Core Strategy's overall target of 27,500)
- Wider benefits from the AAP's strategic infrastructure interventions:
 - The delivery of major transport improvements on northern corridor to enhance and unlock the growth potential of the entire north of Plymouth, where the Core Strategy proposes 6,600 new homes, and improve accessibility of City Centre
 - The delivery of Derriford Community Park which supports overall city growth through addressing European habitats and sustainability requirements for growth.

It is therefore of some significance to the objectives of the Core Strategy that the implications of the Inspector's decision are fully understood and appropriate actions are taken.

Implications for Medium Term Financial Plan and Resource Implications: Including finance, human, IT and land:

The Inspector's report has resulted in a situation where there is increased uncertainty about the future pattern of development and growth in the north of Plymouth. This potentially has financial and resource consequences for the City Council which will need careful management. There is an increased level of risk around the potential to deliver resources associated with growth, such as New Homes Bonus, Business Rates and Community Infrastructure Levy. Additionally, there is an increased risk of costly planning inquiries to resolve key planning issues, such as the location of a new district centre. The recommended courses of action set out in this report are considered the most appropriate ones in light of the need to provide greater certainty about development and growth at the earliest opportunity.

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

The provision of adequate housing and new jobs, as well as quality green spaces for recreation, are key measure to address social issues such as child poverty and community cohesion. The AAP's provisions, and the courses of action set out in this report, are complementary to these objectives.

Equality and Diversity:

Has an Equality Impact Assessment been undertaken? Not in respect of this report. However, an Assessment was undertaken for the AAP itself.

Recommendations and Reasons for recommended action:

It is recommended that the Cabinet:

1. Accept the Inspector's recommendation of non-adoption of the Derriford & Seaton Area Action Plan 2006-2021.

Reason: To accord with Section 20(7A) of the Planning and Compulsory Purchase Act 2004.

2. Agree that the Derriford and Seaton Area Action Plan 2006-2021 (Submitted Version) is not withdrawn, and instead is considered as a background document to support the preparation of the Plymouth Plan.

Reason: Having regard to the provisions of Regulation 27(c) of the Town and Country Planning (Local Planning) (England) Regulations 2012, to ensure that the AAP and its evidence base can play a positive role in the continued development of planning policy for the north of Plymouth and have the potential to be a material planning consideration, albeit of limited weight for planning decisions.

3. Instruct Officers to seek a meeting with the Planning Inspectorate in order to seek a fuller understanding of how it interprets provisions of the National Planning Policy Framework, particularly in relation to evidence of the deliverability of development and infrastructure projects over an entire Plan-period.

Reason: To ensure that the Plymouth Plan is prepared in accordance with a full understanding of the approach that the Planning Inspectorate recommends to its Inspectors in relation to key issues upon which the AAP was found to fail.

Alternative options considered and rejected:

On the matter of adoption of the AAP, the Planning and Compulsory Purchase Act 2004 seemingly provides no alternative to the Council other than to accept the Inspector's recommendation of non-adoption.

However, the Council still is able to determine whether or not to withdraw the Plan, pursuant to Section 22 of the 2004 Act.

Withdrawal would be a normal course of action in these circumstances, and indeed we were invited to consider such a course by the Inspector when he issued his Preliminary Main Concerns report on 4 May 2013. One legal consequence of such an action would be that the AAP and its evidence base would need to be removed from public places, in essence rendering it useless for the purposes of informing the Plymouth Plan. This is because Regulation 27(c) of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires local planning authorities to cease to make available any documents relating to a withdrawn local plan.

However, in this report the Inspector also highlighted that the Council may wish to use much of its relevant evidence base to inform the production of the Plymouth Plan. Furthermore, in his earlier letter of 25 April 2013, the Inspector said that he did not dissent with the thrust of the evidence which supports the need to create a new heart for northern Plymouth and that there are robust and commendable elements within the AAP. In his final report, the Inspector identified 'the informative aspects of some local evidence which has been produced' as part of a suite of documents which could still be used for planning purposes (para. 19). Furthermore, the Inspector did not find against many elements of the AAP and its evidence base.

The pressure for development in the Derriford area remains very significant, and although much progress has been made in relation to bringing forward the necessary infrastructure projects, much more still needs to be done. To withdraw the AAP so that no useful purpose could be realised from the considerable work that went into its preparation would be inconsistent with the intention of the Inspector to enable Council to use the evidence base to inform the Plymouth Plan. A decision to not withdraw the AAP is therefore considered to be the appropriate option in these circumstances.

Published work / information:

Derriford and Seaton Area Action Plan 2006-2021 (Submission Version) December 2012
http://www.plymouth.gov.uk/derriford_aap_submission_rgb_web.pdf

Council's proposed modifications to the submitted Area Action Plan (April 2013)
http://www.plymouth.gov.uk/130416genschedule_of_proposed_amendments_to_aap_proposals_map.pdf

Letter from Andrew Seaman, Senior Housing and Planning Inspector, to Plymouth City Council, 25 April 2013
http://www.plymouth.gov.uk/Inspectors_pmc_issued_for_fact_check_25_april.pdf

Derriford and Seaton Area Action Plan –Preliminary Main Concerns of the Planning Inspector (May 2013), 4 May 2013
http://www.plymouth.gov.uk/derriford_seaton_aap_Inspector_s_preliminary_concerns_4_may_2013.pdf

Report on the Examination into the Derriford & Seaton Area Action Plan 2006-2021 23 August 2013
http://www.plymouth.gov.uk/aap_Inspector_s_final_report.pdf

Town and Country Planning (Local Planning) (England) Regulations 2012
<http://www.legislation.gov.uk/ukxi/2012/767/contents/made>

North West Quadrant Planning Appeal (Reference: APP/N1160/A/12/2169472) Secretary of State's decision
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/226686/13-08-05_Comb_NW_Quadrant.pdf

Background papers:

None

Sign off:

Fin	Pc.Plac eF PC131 4 003.15 0114	Leg	19232/J AR/Jan 14	Mon Off	19232/ DVS	HR	N/A	Assets	N/ A	IT	N/A	Strat Proc	N/A
Originating SMT Member: Paul Barnard, Assistant Director for Strategic Planning & Infrastructure													
Has the Cabinet Member(s) agreed the content of the report? Yes													

1.0 Background

- 1.1 When the Core Strategy was adopted in April 2007, the City Council embarked upon a programme of delivering a series of Area Action Plans (AAPs) which were to be the key strategic delivery plans for the Plymouth growth agenda. These AAPs were targeted so as to drive the City's growth potential around three major areas of opportunity – the City Centre / Waterfront, the Eastern Corridor (centred on Plymstock Quarry and Sherford), and the Northern Corridor (centred on Derriford).
- 1.2 Since this time, the Council has successfully adopted six Area Action Plans. These have helped to drive growth in the city over the last 6 years, including for example around 5,000 new homes, major infrastructure and facilities such as the Life Centre and Eastern Gateway project, and regeneration activities including the transformation of Devonport. Derriford & Seaton AAP was to be the seventh and final Area Action Plan to be adopted before reviewing the Core Strategy in the Plymouth Plan. It was to provide for nearly 3,000 new homes and 8,000 new jobs. This represents about 12% of the population growth, 10% of the homes growth, 20% of affordable housing delivery and 30% of the jobs growth for the city's growth agenda as a whole.
- 1.3 The AAP was formally submitted for Public Examination (PE) in December 2013, and the PE was held by Senior Housing and Planning Inspector Andrew Seaman between 21 and 28 March 2013. The Inspector's final report was issued on 23 August 2013, with the overall conclusion that the AAP was unsound and with a recommendation of non-adoption. Given the strategic importance of the Derriford area to the Plymouth growth agenda, and given the Council's previously perfect track record in securing successful adoption of its development plan documents, this outcome was most disappointing. It became clear to Officers that the Inspector was looking for a level of certainty, detail and depth of evidence well beyond anything that this Council had experienced in earlier PEs, and this seemed to be a direct consequence of his interpretation of the National Planning Policy Framework (NPPF), introduced by the Coalition Government in March 2012. In this respect, it is perhaps noteworthy that the use of AAPs which was encouraged under the former Planning Policy Statement 12 (PPS12) receives no explicit consideration in the NPPF which has replaced PPS12.
- 1.4 A debate took place at Full Council on 25 November 2013 in relation to the implications of the Inspector's report. At that meeting the following resolution was passed:
- 'Notwithstanding the City Council's Core Strategy published in 2007, the Council acknowledges the Planning Inspector's findings following the recent public inquiry into the Derriford and Seaton Area Action Plan.*
- This Council recognises the current uncertainty felt by residents living in the north of our City over potential developments in their communities and in particular the future of the Plymouth Airport site. The Council resolves to ask the Cabinet to review the implications of the Inspector's decision for the Plymouth Plan, including the timing of further community consultation and the need for greater certainty about infrastructure delivery in the north of Plymouth.'*
- 1.5 This report responds to this resolution by considering the implications of the Inspector's report and recommending possible courses of action. Additionally, the timetable for the Plymouth Plan, including the next consultation stages, will form part of the review of the Local Development Scheme which is currently underway.

2.0 The Inspector's reasons for finding the AAP unsound

- 2.1 The NPPF sets out four tests which need to be satisfied for a plan to be considered sound. These are that it is:
- Positively prepared – i.e. based on a strategy that seeks to meet objectively assessed needs and is consistent with achieving sustainable development
 - Justified – i.e. is the most appropriate strategy when considered against reasonable alternatives and proportionate evidence
 - Effective – i.e. deliverable over its period and based on effective joint working on cross boundary priorities
 - Consistent with national policy – primarily the NPPF.
- 2.2 These are in addition to the need to comply with legal requirements, such as the 'duty to cooperate' which was introduced through the Localism Act.
- 2.3 Although the Inspector found that the Council had complied with the duty to cooperate and did not raise concerns in relation to the 'positively prepared' and 'consistent with national policy' tests, he found that the AAP did not adequately satisfy the 'justification' and 'effectiveness' tests on five grounds.
- 2.4 Sections 3.0-8.0 below seek to provide a summary of the key reasoning and messages arising from the Inspector's report, together with a comment on any significant implications where relevant.

3.0 Ground One – relating to Plymouth Airport

- 3.1 The Inspector found that 'The Plan fails to have adequate regard to the close proximity of the currently disused airport and the effects that the potential use of this significant site could have upon the form and location of development within Derriford.'
- 3.2 In reaching this judgment the Inspector agreed with the local planning authority's (LPAs) view that the airport site is of strategic importance to the City and that the LPA was right to consider this as part of the Plymouth Plan process rather than the AAP. However, he felt that in the absence of informed references to the potential future uses of the airport site, the AAP is not considered to be sound.
- 3.3 The Inspector therefore appears to have determined that the AAP cannot be advanced ahead of the Plymouth Plan, notwithstanding the LPA's strongly articulated views to the contrary.

4.0 Ground 2 – relating to economic evidence base & location of district centre

- 4.1 The Inspector found that 'The Plan is not supported by up to date and adequate economic evidence which justifies the location of the District Centre upon the Plymouth International Medical Technology Park.'
- 4.2 The Inspector felt it wasn't clear how the development of a district centre on part of Plymouth International Medical Technology Park (PIMTP) would assist the Core Strategy policy of strengthening the role of PIMTP. Although it would generate employment there was no detailed evidence to indicate that, in terms of volume or quality, such employment would meet or contribute adequately towards the objectively assessed needs of the city. He considered that a more comprehensive employment evidence base was required in order to draw useful conclusions about whether it was appropriate to deliver the district centre upon

what has historically been a strategic location for employment growth in Plymouth and a potentially prime employment site.

5.0 Ground 3 – relating to deliverability evidence base

- 5.1 The Inspector found that ‘The Plan is not supported by adequate evidence that demonstrates the timely deliverability of key sites across the Plan period.’
- 5.2 The Inspector considered that there was insufficient evidence about how the employment proposals of the AAP would be delivered in accordance with the delivery timescales assumed in the Plan. This was particularly so given that the AAP’s Viability Appraisal showed that commercial speculative employment development is currently unviable, notwithstanding the LPA’s case that such development was likely to take place through bespoke or subsidised development in the early years.
- 5.3 The Inspector’s judgement potentially has implications for future land allocations for employment purposes, and therefore further clarification from the Planning Inspectorate on the correct interpretation of the NPPF should be sought so that this does not impeded future plan preparation – most notably the Plymouth Plan.
- 5.4 The Inspector also felt that there was a lack of clarity about the implications of reprogramming of the Forder Valley Link Road (FVLR) until later in the Plan-period for fully delivering the PIMTP proposal. This illustrates the strategic importance of the FVLR to unlocking the growth potential of Derriford and the north of Plymouth.

6.0 Ground 4 – relating to transport evidence base (modal shift).

- 6.1 The Inspector found that ‘The Plan is not supported by evidence to indicate that the timely modal shift necessary to ensure transport infrastructure will be able to accommodate the development proposed within the area can be secured.’
- 6.2 The Inspector agreed that the Council’s ambition for modal shift is well-founded and consistent with the NPPF. Rather, his concern was that the combined effects on modal shift of the transport policies and proposals were unclear and there was insufficient indication that the challenging nature of the necessary modal shift is capable of being delivered. Furthermore, he was concerned that the ‘necessary modal shift’ would not be facilitated by infrastructure provision until such time as discrete elements are provided or key development sites well advanced. Improvements would be piecemeal and not realised until 2020 and beyond.
- 6.3 The Inspector’s conclusions also highlight the importance of prioritising investment in transport infrastructure in order to deliver growth. These are matters that will need to be addressed in the Plymouth Plan process.

7.0 Ground 5 – relating to transport evidence base (infrastructure).

- 7.1 The Inspector found that ‘The Plan is not supported by evidence that the transport infrastructure shown within the Plan is deliverable in a timely fashion.’
- 7.2 The Inspector was concerned about the limited information about how severance caused by the A386 will be resolved. He did not accept the LPA’s argument that this was a detailed matter that would be addressed through masterplanning and project development.

- 7.3 The Inspector agreed that the balance of evidence supports the need for the FVLR. He felt that changes to the programming and costing of FVLR, which had been identified post-submission of the AAP, undermined the timescale in which a key part of the high quality public transport network can be delivered, with potential implications for Seaton Neighbourhood, PIMTP and the proposed district centre.
- 7.4 He also felt that there was a lack of clarity and certainty about future funding for infrastructure projects, although he affirmed that this uncertainty was at 'no fault of the Council'. Significantly, in this respect, he attached little weight to the Council's track record in securing infrastructure funding. It seems clear that the Inspector was seeking a much higher level of certainty of both external (e.g. grants) and internal (e.g. Community Infrastructure Levy, New Homes Bonus, capital receipts, business rates) sources of funding, as well as clarity on the contingencies should funding not be secured.
- 7.5 The Inspector's judgments in relation to deliverability and funding of infrastructure raise fundamental issues about the depth of evidence needed to support local plans and the level of certainty required. The evidence supplied by Officers was far more detailed and forward looking than for any previous AAP, and of a depth that Officers considered appropriate for a local plan of this nature having regard to their previous experience and interpretation of the NPPF. However, the Inspector's interpretation was clearly different and this is a matter which could helpfully be clarified by the Planning Inspectorate before the Plymouth Plan is prepared.

8.0 Other key messages from the Inspector's report

Whether an unsound AAP creates a policy vacuum having a detrimental impact on growth

- 8.1 The Inspector suggested that the absence of an adopted AAP should not lead to a deferral of growth. He felt that the following documents give an adequate basis for determining planning applications:
- NPPF
 - The Adopted Core Strategy and its vision for Derriford
 - Informative aspects of some local evidence which has been produced for the AAP.
- 8.2 It should be noted that were the Council to formally withdraw the AAP it would also need to withdraw the evidence base which was specific to the AAP, in effect rendering it useless as a material consideration. This is a consequence of Regulation 27(c) the Town and Country Planning (Local Planning) (England) Regulations 2012 which deals with the process for withdrawing a plan. See section above on 'Alternative options considered and rejected' for a fuller commentary on this point.

Place shaping

- 8.3 Explicit support was given for the LPA's evidence base and approach in relation to Place Shaping, and to its understanding of local urban character / sense of place. Particular recognition is given to the analysis of the disparate urban characteristics of the locality and the potential to develop the 'second heart' of Plymouth utilising the valley topography and other assets. An implication is that the general location for the district centre – i.e. at the heart of Derriford, rather than in a more peripheral location – gets some support from the Inspector's report.

- 8.4 The role of the Design Supplementary Planning Document (SPD) in supporting permeability and connectivity was given explicit support by the Inspector. This is a helpful reference to the relationship between statutory and supplementary planning documents which the LPA will need to bear in mind for the Plymouth Plan and future SPD production.

Retail policy, evidence and need for district centre

- 8.5 The Inspector accepted that Derriford will be a 'significant' urban centre and, that when it has grown, the district centre will become a 'major' district centre. He sees this as consistent with the Core Strategy, but he also highlighted that the potential retail hierarchy may need to be clarified in the Plymouth Plan.
- 8.6 The quantitative assessments of retail need in the Plymouth Retail and Centres Study (2012) were considered to be up-to-date and reflective of current economic conditions. The Inspector accepted that there is a need for the level of retail provision proposed in the AAP, on the basis of qualitative rather than quantitative need, as supported by the 2012 study. He said that the floorspace figures were not precisely derived and were best used as a guide. With regard to the floorspace guidance provided by Proposal DSI6 (for a new district centre) and degree of flexibility in implementation of DSI6, he found no evidence against the modifications proposed by the LPA in response to discussions at the hearing sessions.
- 8.7 The Inspector supported the LPA's approach to determining the acceptability of future growth of the district centre. He accepted the evidence that the district centre would not be fundamentally harmful to other district centres, supported the LPA's proposed use of Retail Impact Assessments, and agreed that there is no need for a more prescriptive / inflexible approach as sought by City Centre interests.

District centre location

- 8.8 The Inspector accepted that evidence has been produced which enables consideration of locations other than those to the west of the A386, which is relevant in the context of Area Vision 9 of the Core Strategy and its retail policies. However, the issue for him was whether the former Seaton Barracks parade ground was the most appropriate location with due regard to alternatives. In relation to the alternatives:
- Glacis Park – The Inspector agreed with the LPA's view that although the potential exists for a district centre on this site with expansion potential, there was no substantive evidence to support it being deliverable within the timescales desired.
 - North West Quadrant (NWQ) – The Inspector considered this site to be well served by bus routes and well related to other key sites in the Plan, but with limited visible frontage towards the A386 and with a gradient across the site. Notwithstanding the recently dismissed Section 78 Appeal into the refusal of planning permission for a retail-led mixed use development, he acknowledged that the evidence supports the site being considered as a reasonable alternative, this being consistent with the view presented by the LPA. He said that it needs to be considered with regard to the evolving evidence of Plymouth's economic needs and the continuing work on the transport infrastructure of the locality.
 - Plymouth Airport site – The Inspector felt that although this site is closer to existing residential communities, it is distant from the core of activities in Derriford and not supported by the Core Strategy objective of addressing the fragmentation of large single land uses in Derriford. The evidence did not support the site as a better reasonable alternative.

- Former Seaton Barracks parade ground – The Inspector felt that this site was of sufficient size, with reasonable scope for expansion into Derriford Business Park and deliverable in the shorter term. It had the potential to deliver the objectives contained within the Plan. However, the indicative designs did not make best use of A386 frontage and he had concerns about the evidence to support this alternative (see commentary on Ground 2 above).

8.9 In conclusion, the Inspector felt that the location of the district centre was a finely balanced judgement, which in the case of the AAP's preferred site of the former Seaton Barracks parade ground was weakened by inadequate employment land evidence, particularly when the alternative of NWQ is considered.

Homes and Communities

8.10 The Inspector agreed with the LPA's view that the evidence supports the need to create a new heart for the Derriford locality via an appropriate and sustainable mix of housing and other uses.

8.11 In relation to specific site proposals the Inspector:

Seaton Neighbourhood:

- Agreed that the impact of topography had been appropriately considered in the viability assessment.
- Agreed that the evidence supported the principle and content of the allocation.
- Noted the submissions made by another party identifying the sequentially preferable redevelopment of the airport site as a reasonable alternative, but did not consider these submissions justified deleting the proposal. In this regard, he took account of the role of the proposal in supporting the Council's ambition to create a clearer heart to the Derriford and Seaton area.
- Felt there was a lack of clarity on how the development would be phased given the need for the FVLR. This again highlights the urgency of accelerating delivery of the FVLR if possible.

Glacis Park:

- Supported the proposed mix of uses.
- Raised concerns about the viability of employment uses— see comments above on Ground 3.

North West Quadrant:

- Agreed that the retail element of the proposal was adequately justified, although the provision for BI was less well justified.
- Stated that the likely viability of the local centre was unknown, and that the proposal seemed capable of at least partial delivery, but there was uncertainty over whether it could be delivered fully in the envisaged timescales.

Quarry Fields:

- Supported development for housing, with 70 units at the lower end of an acceptable development range.

Education infrastructure

8.12 The Inspector agreed that evidence was in place to support the deliverability of the new primary school. He accepted that there was no contrary evidence indicating the education requirements will not be met.

Monitoring

- 8.13 The Inspector felt that there was no indication that monitoring could lead to reasonable management actions that would secure the effective and timely delivery of the Plan. Additionally, there was no reference in the implementation schedule as to how contingencies had been considered. Monitoring and contingencies will need to be explained much more clearly in the Plymouth Plan.

9.0 Next steps

- 9.1 The Inspector has made a recommendation to the Council of non-adoption of the AAP. The Council has no real choice but to accept this recommendation. However, the question of what should happen to the AAP itself does remain.
- 9.2 In the particular circumstances, it is considered appropriate to not withdraw the AAP, and instead to use the AAP and its evidence base as background documents to support the preparation of the Plymouth Plan. Indeed, as explained in the above section on 'Alternative options considered and rejected', the Inspector himself seems to have anticipated such an outcome. Withdrawal of the AAP would in effect render the draft AAP and its evidence base of no purpose, and yet, as can be seen from the analysis above, the Inspector did highlight that there were elements of the draft AAP that were 'robust and commendable'. In light of the pressure for development in the north of Plymouth as well as the pressing work on the Plymouth Plan, it would indeed be a perverse outcome if the draft AAP and its evidence base could serve no useful purpose.
- 9.3 Notwithstanding this recommendation, it is important to note that the draft AAP will only carry limited weight in relation to any planning application decisions (as confirmed in the recent Secretary of State appeal decision on the North West Quadrant planning application). Furthermore, the weight would be even less where the decision relates to a matter that the Inspector clearly found unsound. Planning Officers who are responsible for determining planning applications or making recommendations to Planning Committee will need to analyse each proposal carefully on a case-by-case basis.
- 9.4 In addition, there is considered to be merit in seeking clarification from the Planning Inspectorate in relation to how it is advising inspectors to interpret planning policy, particularly on issues such as the evidence base requirement around deliverability, viability and funding. The approach now seems very different to previous development plan documents considered in Plymouth, and it is important that any key lessons are learnt ahead of completion of the work on the Plymouth Plan.
- 9.5 Finally, it should be noted that the Plymouth Plan will be the vehicle by which the policy framework for the north of Plymouth, set by the adopted Core Strategy, is formally updated. Although a decision to not withdraw the AAP will enable it, together with the relevant evidence base, to inform the preparation of the Plymouth Plan, there remains the need for further consultation with the public as well as stakeholder organisations. This would have been necessary in any case, regardless of the AAP Inspector's decision. It will take place as part of a programme of city-wide and area-specific consultations currently anticipated for summer 2014. The details of the programme for the Plymouth Plan will be considered in the Local Development Scheme review which is currently underway.