



# Report to Plymouth City Council

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an Inspector appointed by the Secretary of State  
for Communities and Local Government

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## PLANNING AND COMPULSORY PURCHASE ACT 2004

### SECTION 20

## REPORT ON THE EXAMINATION INTO THE CITY CENTRE AND UNIVERSITY AREA ACTION PLAN

Document submitted for Examination on 30 October 2009  
Examination Hearing held on 26 January, 1 and 2 February 2010  
File Ref: LDF000462

## **1 Introduction and Overall Conclusion**

- 1.1 Under the terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004, the purpose of the independent Examination of a Development Plan Document is to determine:
- (a) whether it satisfies the requirements of s19 and s24(1) of the 2004 Act, the regulations under s17(7), and any regulations under s36 relating to the preparation of the document; and
  - (b) whether it is sound.
- 1.2 This report contains my assessment of the City Centre and University AAP ("the AAP") in terms of the above matters, along with my recommendations and the reasons for them, as required by s20 (7) of the 2004 Act. The starting point for the Examination is the assumption that the Council has submitted what it considers to be a sound plan. My report firstly considers the legal requirements, and then deals with the relevant matters and issues considered during the Examination in terms of justification, effectiveness and consistency with national policy. I conclude that the AAP is sound, provided it is changed in the ways specified in Annex 1. None of these changes should materially alter the substance of the AAP or undermine the sustainability appraisal and participatory processes already undertaken. The changes required are:
- a) Clarify that the Core Strategy Policy CS15 requirement for an element of affordable housing is applicable to all qualifying sites;
  - b) Change the requirement in Policy/Proposal CC 5 for a Combined Heat and Power and District Heating and Cooling Network to an encouragement to provide such a facility.

## **2 Legal Requirements**

- 2.1 The AAP is contained within the Council's Local Development Scheme 2009, with a submission date of October 2009 and an Examination date of March 2010. The Council's Statement of Community Involvement has been found sound by the Secretary of State, and was formally adopted by the Council before the Examination hearings. The Statement of Consultation is very comprehensive. Notwithstanding the fact that some may not have been aware of the various consultation stages, I am satisfied that the Council has exceeded the statutory requirements for consultation.
- 2.2 The preparation of the AAP has been appropriately informed by a Sustainability Appraisal. The plan is also guided by Plymouth's Sustainable Community Strategy 2007 - 2020. In accordance with the Habitats Directive, I am satisfied that as a result of the Screening Report undertaken, and the inclusion of recommended minor amendments to the AAP, there will be no significant adverse impact on the integrity of the relevant Natura 2000 sites. Finally, the South West Regional Assembly has indicated that the AAP is in

general conformity with the draft Regional Spatial Strategy for the South West. Accordingly, the legal requirements have been satisfied.

### **3 Justified, Effective and Consistent With National Policy**

#### **Matter 1 – Does the AAP sufficiently explain how the preferred approach is arrived at?**

- 3.1 The vision and objectives for the City Centre and University AAP are set down in the adopted Core Strategy. The AAP takes these forward in a consistent and appropriate way. The comprehensive and expansive evidence base is listed in Chapter 16. The current state of the City Centre is briefly described in paragraphs 2.4 to 2.6, followed by the main issues that need to be addressed. The AAP then contains a series of strategic objectives, and appropriate Policies/Proposals to achieve them. These are consistent with those in the Core Strategy.
- 3.2 The path towards the submitted AAP's Policies/Proposals and the choices made are clearly explained in the supporting documents, including the Sustainability Appraisal, the Regulation 30 Statement, the Issues and Options Report 2005, the Issues and Preferred Options Report 2008, the City Centre Sites Newsletter Consultation 2009, and the Pre Submission Consultation Report 2009.
- 3.3 The Council is correct in proceeding on the basis that the AAP does not need to include summaries of the various stages of plan production, provided the evidence base is clear and an audit trail visible. A minor criticism could be that it is difficult for members of the public to track changes in the Council's approach throughout the various documents preceding the submitted AAP. This is an issue that the Council is aware of and is seeking to address in the production of further development plan documents. Notwithstanding this, I am satisfied that the AAP is sound in relation to this first matter, and accordingly no changes are needed.

#### **Matter 2 – Is the encouragement of more intensive development justified, and appropriate recognition given to the townscape and heritage assets?**

- 3.4 The commercial health of the City Centre and the issues for its future prosperity are well summarised in Chapter 2 of the AAP. The conclusions there are founded on the comprehensive analysis of the Centre's commercial strengths and weaknesses, set down in the document "*Plymouth City Centre – Future Direction Investment and Development Strategy*". The inescapable conclusion is that if Plymouth is to perform its role as a regional shopping destination, serve the needs of an expanding population in the sub region and attract the level of investment needed to enhance the Centre's built environment and thereby achieve the Core Strategy vision, more intensive commercial development is needed. Given the constraints

imposed by the highway network and the opportunities provided by the low intensity and poor quality of some existing City Centre buildings, the most feasible and attractive option is to selectively redevelop and intensify existing sites. Accordingly, the AAP proposes to accommodate about 200,000 sq m of new high quality retail and commercial floorspace on a number of sites within the existing Centre.

- 3.5 There is no dispute that more intensive development must not be at the expense of the unique heritage of the Abercrombie Plan with its "Beaux Arts" street pattern and landmark buildings, which deserve to be enhanced. The AAP is founded on a solid understanding of the importance of this matter, utilising conclusions from several detailed studies of the City Centre's heritage assets. It is evident that the approach taken by the AAP is not to intensify development at the expense of heritage but to use development to prevent further decline, and then to significantly enhance the Centre's architecture and the quality of the public realm. I am satisfied that the relevant Policies/Proposals for development sites and the public realm, supported as they will be by the generic design Policies in the Core Strategy and by the Council's Design Supplementary Planning Document (Sustainable Design in Plymouth), are capable of achieving the AAP's strategic objectives.
- 3.6 Accordingly, I find that the AAP's overall approach and its Policies/Proposals are well justified by a solid evidence base. A minor criticism is the submission document could be clearer as to how the AAP will be interpreted in order to achieve its objectives. The Council recognises that the document could be made clearer by indicating the AAP's role in the context of the Waterfront Regeneration Area and in relation to the production of more detailed guidance for specific areas of change. Changes to the text are suggested, which I endorse as they do not question the soundness of the plan but are welcome clarification of the approach being taken. My overall conclusion on this matter is that no other changes to ensure soundness are required.

**Matter 3 - Does the AAP justify its relaxation of the Core Strategy requirement to provide at least 30% affordable housing on some sites?**

- 3.7 The AAP proposes that three strategic sites, which are identified through Policies CC 8, CC 11 and CC 14, should be exempt from Core Strategy Policy CS 15. This seeks the provision of least 30% affordable housing on sites of 15 dwellings or more. The Council told me that its approach would be that affordable housing will not be required on these sites but developers would still be encouraged and supported to provide an element of affordable housing in accordance with the provisions of Policy CC 4. This identifies a range and mix of housing as a key component of a sustainable City Centre neighbourhood. The Core Strategy policy would apply as

normal to all other qualifying sites which come forward in the City Centre.

- 3.8 With regard to the justification for this approach, a general point made by the Council is that from a strategic housing delivery perspective, there is no need to make provision for affordable housing in the City Centre. This is because the Annual Monitoring Report and Strategic Housing Land Availability Assessment both indicate a sufficient supply of housing sites outside the City Centre that will meet the Core Strategy's overall affordable housing target. Whilst that is the case, the affordable housing target is expressed in the Core Strategy as a minimum target and should be viewed in the context that it is considerably less than the identified affordable housing need. Therefore, if an opportunity arises whereby the level of affordable housing delivery may be increased above the minimum target, then I consider that that opportunity should be taken.
- 3.9 The main reason put forward by the Council for taking an exceptional approach to the three strategic sites is that they are complex and expensive sites to assemble. Accordingly, it may not be viable to make provision for affordable housing whilst also delivering a high quality commercial regeneration scheme. However, I consider this argument could be equally applicable to other sites found in the City Centre, albeit on a smaller scale. Importantly, the Council has provided no evidence to substantiate the view that a requirement for affordable housing would be likely to tip the balance of viability on these strategic sites in comparison to others. I do note that the Council is either the landowner or one of the landowners in relation to all three sites. Consequently, I consider there may be more scope for these sites to absorb the additional costs of affordable housing because the Council may consider it has the flexibility to accept less than "best consideration" for the land where economic and social well being objectives can be achieved.
- 3.10 In the light of the above, I do not consider a case has been made for an exceptional approach to be taken to the three strategic sites. I consider Core Strategy Policy CS 15 should continue to apply to all qualifying sites with the target of at least 30% affordable housing provision being the starting point for negotiation. Flexibility to accept less than this target where viability is critical is already firmly built into the Core Strategy policy by reference to paragraph 10.32 of that document. Nevertheless, in order to apply this flexibility with a clear rationale, I consider it is necessary for the AAP to set out how the provision of affordable housing fits into the priorities for the AAP. The over-arching objective of the AAP is the delivery of high quality commercial regeneration schemes. Therefore, if a choice has to be made due to viability considerations between the maximisation of affordable housing provision and the delivery of a high quality commercial scheme, then it should be made clear in the document that it is the latter that will take

priority, and the level of affordable housing sought will be reduced accordingly.

**To ensure soundness in relation to the AAP's approach to the provision of affordable housing, I recommend it is changed in accordance with Recommendation R1 in Annex 1.**

**Matter 4 - Should the Policies/Proposals contain more detail in relation to the housing numbers expected, including affordable housing and student accommodation?**

- 3.11 The Area Vision for the City Centre and the strategic objectives set down in the AAP make it clear that the thrust of the plan is aimed at reinforcing its commercial, cultural and recreational role. The AAP also seeks, via Policy/Proposal CC 4, to create a sustainable City Centre community, but the Centre is not relied upon to deliver significant amounts of new housing, having regard to the overriding commercial objective. Accordingly, a housing target is not an essential element of the AAP, and the Policies/Proposals do not, for the most part, specify a minimum amount of new housing to be included in the mixed use developments planned for. In view of the complexities of redeveloping City Centre sites, and the more detailed work that must follow this AAP in defining appropriate development briefs, I agree that it would not be appropriate or helpful to restrict the amount of new housing that could be provided.
- 3.12 Further justification for not relying upon the City Centre to deliver a specific amount of housing can be found in the provision for new housing that is made in the Core Strategy, other AAP's already adopted by the Council, and the 2009 Annual Monitoring Report. These confirm that the Core Strategy housing requirement can be comfortably provided for on sites outside the City Centre. However, some detail is specified in the AAP. The Key Development Outputs table on page 17 indicates that 830 – 1,000 dwellings will be provided. Table 3 on page 82 shows 830 – 1,100 dwellings, whilst Figure 5: "City Centre and University Local Delivery Scheme" indicates a range of 1,383 to 1,683 dwellings being provided. A further indication of numbers is provided by Figure 6: City Centre Housing Trajectory. Clearly the AAP needs to be consistent throughout. The Council has recognised this consistency point, and proposed minor changes to ensure that this is achieved. These changes do not raise soundness issues and I am content to endorse them as useful clarification.
- 3.13 As far as affordable housing is concerned, I accept the Council's reasoning that the City Centre does not offer significant potential to provide affordable housing. Therefore, it is not appropriate for the AAP to specify numbers of affordable housing units to be provided on each site. However, for the reasons I have already given, the plan should seek affordable housing provision wherever it can be

achieved without deterring the investment needed to ensure sites are redeveloped in accordance with the AAP's strategic objectives.

- 3.14 In relation to student accommodation, the AAP aims to support Plymouth University's objective to provide a room for all first year students. This objective leads to a requirement for some 2,000 additional rooms, which clearly will not all be provided within the City Centre. Although I appreciate that additional student accommodation close to the University is very desirable, again it would unnecessarily constrain redevelopment options and require the AAP to specify too much detail to impose a requirement on specific sites. For that reason, the AAP should not be changed in this respect. To conclude on this matter, no further changes are required to ensure soundness.

**Matter 5 – Is the AAP's relationship to the Waterfront Regeneration Area sufficiently explicit?**

- 3.15 The starting point for the consideration of the relationship of this AAP with surrounding areas is the Core Strategy. Diagram 3 therein shows the City Centre as part of the wider Waterfront Regeneration Area. Eventually, six AAPs will define the detailed policy framework for the Waterfront. The City Centre and University AAP is therefore to be seen as one element of this framework. The submitted AAP already contains references to the surrounding areas and how developments there will be integrated with the City Centre.
- 3.16 However, although duplication across the relevant AAPs should be avoided, I consider that it is important that the current plan gives clear guidance where there are important cross boundary issues being addressed and more detailed policy guidance available in other, adopted AAPs. One such area is the new Boulevard planned to link the City Centre with Millbay and Stonehouse and the significant amount of residential and commercial development planned there. This Boulevard is one of the key features of the City's regeneration vision, and it is therefore important that the AAP provides clear policy guidance so that detailed plans for the Boulevard provide for proper integration with the existing City Centre's public realm and built environment. The Council proposes a series of minor changes to the submitted AAP, including improved diagrams and the Proposals Map. These will make more explicit the relationship of this AAP with others to produce comprehensive policy guidance across the Waterfront Regeneration Area. These changes do not in any way raise questions of soundness but they have my support.

**Matters 6 - Does the AAP contain sufficient guidance on what improvements to the public realm are expected?**

- 3.17 Policy/Proposal CC 3 promotes improvements to the City Centre's public realm that are consistent with the Core Strategy Area Vision, and consistent with the retention and enhancement of Plymouth's Beaux Arts townscape. The form of these improvements will clearly be of crucial importance to the achievement of those wider objectives. The Council recognises that much more detailed guidance is needed in this respect, and intends to produce a Public Realm Delivery Plan. This will draw upon the very detailed content of the Council's recently adopted Design Supplementary Planning Document, which includes guidance on the appropriateness of tall buildings.
- 3.18 Further to discussion at the Hearings, I am satisfied that the AAP itself, with the minor changes the Council's proposes, goes as far as it ought to in setting down the guiding principles to follow when the Delivery Plan is drawn up and at the stage when development proposals for individual sites will be assessed. I accept that it would be neither feasible nor desirable for the AAP to contain greater prescription of the precise form of improvements to the public realm. Accordingly the AAP is sound in this matter, and no other changes are needed.

**Matter 7 – Does Policy/Proposal CC 18 contain enough guidance on the form of development expected?**

- 3.19 I understand that CC 18 includes a number of sites in different use, some of which present redevelopment opportunities to strengthen the fundamental leisure and entertainment function of that part of the City Centre. In view of the uncertainty over when such redevelopment proposals might emerge, I accept that the AAP cannot be more detailed on the form of development expected beyond expressing guiding principles applicable to much of the City Centre. However, on one matter the supporting text to CC 18 is unequivocal in stating that the Council proposes to vacate the existing Civic Centre and move its offices to another location. I am aware that this is a locally controversial issue, and I make no comment on the merits of the building's Listing, or retaining the Civic Centre or otherwise. The Council told me that the correct position is that no decision has been made to vacate this site. Therefore the AAP should be changed to remove a misleading statement and clarify the current position. The Council's proposed changes deal with this point, and I endorse it as welcome clarification rather than a soundness matter.

### **Matter 8 - Is Policy/Proposal CC 5 correctly worded?**

- 3.20 Much to its credit, the Council has been proactive in considering how the Government's drive towards achieving zero carbon development can be met within the area covered by the AAP. The Plymouth City Centre and Derriford Sustainable Energy Study (2009) concludes that an area wide approach through the use of combined heat and power and district heating/cooling (CHP/DH) is technically the most sensible solution to adopt. The Council is now moving forward with this by investigating the feasibility of establishing an Energy Service Company (ESCo) to design, build and manage such infrastructure. To provide greater detail and clarity about the proposed CHP/DH network the Council have put forward revised wording for Policy CC 5 and its supporting text. I generally endorse this.
- 3.21 However, although the Council's evidence base justifies the pursuit of this solution over other possible options, the preferred option has not been subject to detailed viability testing, as required by paragraph 33 of the PPS 1 Supplement "Planning and Climate Change" in terms of the overall costs of bringing sites to the market and the need to avoid any adverse impact on the development needs of communities. In the light of this, it is inappropriate for the Policy to "require" the provision of such infrastructure, it should rather "encourage" its delivery pending a detailed viability assessment.

**Therefore, to ensure soundness, I recommend amending Policy CC 5 and the supporting text in accordance with the Council's suggested change but incorporating necessary alterations. The replacement Policy and text is provided in full in Recommendation R2 in Annex 1.**

### **Matter 9 – Does the AAP promote sustainable and integrated transport?**

- 3.22 The creation of a safe and accessible City Centre for all transport modes is rightly one of the AAP's strategic objectives, and its achievement will be a key indicator of the success of the plan's overall approach. Policy/Proposal CC 6 relates to the Strategic Road Network. Subject to some relatively minor junction improvement works, the Council is confident the highway network contains sufficient capacity to accommodate the traffic growth expected to occur. Other sections of the AAP aim to rationalise car parking, improve pedestrian and cycle links and make provision for the High Quality Public Transport system being developed across the City. The AAP needs to be read alongside other Council documents, especially the Local Transport Plan. The latter contains much more detail on the schemes that will achieve Strategic Objective 3.

- 3.23 One minor change to the AAP that will ensure clarity and consistency is the addition of a reference to the potential to improve connectivity between rail and bus in proposals to redevelop Plymouth Railway Station. The Council proposes an appropriate change to Policy/Proposal CC 14, and other minor changes to improve connectivity between the City Centre and adjoining areas, which I support. Overall, I am satisfied that the AAP is sound on this matter and no further changes to ensure soundness are needed.

**Matters 10 – Does the AAP bring together the plans and proposals of all relevant bodies to achieve implementation? Are any implications of any delay in delivering key projects sufficiently identified and accounted for?**

- 3.24 It is clear from the Council's statement in response to this matter that the AAP has been prepared in close collaboration with major stakeholders. Table 1 on pages 75 to 78 demonstrates that the Council is keenly aware of the important role that other bodies will play in the AAP's implementation. The Council's Infrastructure Delivery Plan will allow the AAP's Policies/Proposals to be matched with available resources and with other plans and programmes.
- 3.25 Table 1 also includes an analysis of the risks to delivery of infrastructure projects. Improving transportation to and from the City Centre involves several major projects; chief amongst these is the High Quality Public Transport system. The implications of any delay in securing funding and implementing this project are well understood by the Council. Nevertheless, the latter confirmed at the Hearings that, mainly due to sufficient highway capacity on the existing network, redevelopment of City Centre sites is not dependent on transportation projects and they could proceed in advance of such improvements taking place. Accordingly I find that the AAP is realistic and geared towards achievement, and no changes are needed to ensure soundness in this respect.

#### **4 Overall Conclusion**

- 4.1 There are no other matters related to justification, effectiveness or consistency with National policy and Regional Guidance that cause me to question the soundness of the AAP. I therefore conclude that with the changes I recommend, as detailed in Annex 1, the AAP satisfies the requirements of S 20(5) of the 2004 Act and is sound. The Council wishes to make several minor changes to the submitted AAP in order to clarify, correct and update various parts of the text. As I have already stated these changes do not address key aspects of soundness, and I endorse them in the interests of clarity and accuracy. These changes are shown in Annex 2.

*Douglas Machin*

Inspector

**ANNEX 1 - CHANGES REQUIRED TO ENSURE SOUNDNESS**

<b>Rec. No</b>	<b>Page No</b>	<b>Para No</b>	<b>Change Required</b>
R1	16  39,46,53  40,47  80  27	3.16    7.11, 8.10   5.18	<ul style="list-style-type: none"> <li data-bbox="788 371 1366 517">▪ Delete the fourth and fifth sentences of the first bullet point and delete "also" from the last sentence.</li> <li data-bbox="788 551 1366 629">▪ Delete the last sentence of Policies CC8, CC11 and CC14.</li> <li data-bbox="788 663 1366 696">▪ Delete paragraphs 7.11 and 8.10.</li> <li data-bbox="788 730 1366 976">▪ In Table 2, under the "Delivery" box for Affordable Housing, replace the text with, "The Core Strategy affordable housing requirement applies to all developments in the City Centre which meet the policy criteria".</li> <li data-bbox="788 1010 1366 2038">▪ Insert the following text after the first sentence of paragraph 5.18: "This means creating a local City Centre community of sufficient mass of between 2000 – 3000 people, linked to the wider communities of Millbay, Stonehouse and Sutton Harbour (see Core Strategy paragraph 3.6) to support a sense of belonging, vitality and safety. Policy CC4 applies to all sites in the City Centre. It challenges all development proposals to provide an element of housing, and where they do it sets out that the Council wishes to see a range and mix of house types provided, including affordable housing. The site threshold and target levels of affordable housing provision set out in the Core Strategy will be applicable. (Policy CS15 specifies a threshold of 15 dwellings or more and a target level of at least 30% affordable housing provision). However, where viability assessments demonstrate it is not possible to achieve this</li> </ul>

			<p>level of affordable housing provision whilst also delivering the Council's aspirations for a high quality commercial regeneration scheme, then it is the latter that will take priority as this is the over-arching objective of the AAP and thus the level of affordable housing sought will be reduced.</p> <ul style="list-style-type: none"> <li>▪ The remaining part of paragraph 5.18 should form a new paragraph.</li> </ul>
<b>R2</b>	28	<p>5.21</p> <p>5.22</p> <p>5.23</p>	<p><b>Replace the section on "Enabling Low Carbon Development" by</b></p> <p>The Council recognises the need to reduce the city's carbon footprint as part of the necessary response to climate change, delivering the Government's move towards low or zero carbon development. Plymouth's Climate Change Action Plan sets out targets for a 20% reduction in City-wide CO2 emissions by 2013 and 60% by 2020.</p> <p>The potential developments in the City Centre are of a significant scale, in terms of future energy demand, and they will be subject to increasingly challenging targets concerning carbon dioxide emissions under future Building Regulations, which means that plans for the City Centre need to embrace new low carbon energy infrastructure.</p> <p>The Plymouth City Centre and Derriford Sustainable Energy Study (2009) demonstrates that due to size, mix, location and phasing of new development proposals, the Government's aspirations for low or zero carbon developments can only realistically be met through the use of combined heat and power, and district heating/cooling solutions. This area wide approach has the potential to significantly reduce the level of carbon emissions from new and existing developments whilst also reducing the cost burden to the developer.</p>

	<p>29</p>	<p>5.24</p>	<p>The Core Strategy, Strategic Objective 11 and Policy CS20 support the Government's move toward zero carbon development. With regard to the City Centre &amp; University area, Policy CC5 defines how this can be progressed through specific development proposals.</p> <p><b>Policy/Proposal: CC5</b></p> <p><b>Combined Heat and Power/District Heating and Cooling</b></p> <p>The delivery of an integrated Combined Heat and Power and District Heating and Cooling (CHP/DH) network throughout the City Centre and University area will be encouraged to enable existing and new development to achieve significant carbon savings. To enable the delivery of this network:</p> <ol style="list-style-type: none"> <li>1. Development proposals at Colin Campbell Court (CC8), Cornwall Street (CC11) and North Cross (CC14) will be encouraged to include space for a Combined Heating and Power Energy Centre, to support a phased roll-out of the district heating network.</li> <li>2. All proposals for non-residential development exceeding 1,000 sq m of gross floor space and residential developments comprising 10 or more units (whether new build or conversion) will be encouraged to:             <ol style="list-style-type: none"> <li>a. Where the district wide network is not yet operational in relation to the particular development under consideration to:                 <ol style="list-style-type: none"> <li>i. Make an offsite contribution to the establishment of the network.</li> <li>ii. Include heating and cooling systems that allow future connection to the local district heating/cooling networks.</li> </ol> </li> <li>b. Where the district wide network is operational in relation to the particular development under consideration to:</li> </ol> </li> </ol>
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		<p>5.25</p>	<p>i. Connect to the network. ii. Make an offsite contribution towards local completion of the network.</p> <p>The requirement (set out in Core Strategy Policy CS20) for development to incorporate onsite renewable energy production equipment is relaxed for such developments, in favour of measures that enable the delivery of area wide solutions.</p> <p>Individual proposals that come forward that would help the delivery of the CHP/DH network will be supported by the Council. The opportunity to incorporate district heating/cooling pipe infrastructure will be considered in the forward planning and delivery of all relevant transport and public realm work in the City Centre and University area.</p> <p>Other developments will be encouraged to include heating and cooling systems that allow connection to the network.</p> <p>The Plymouth City Centre Sustainable Energy Study 2009 demonstrates that due to the nature and location of the proposed developments that the emissions reduction targets proposed in the CLG Policy Statement, 'Building a Greener Future' will not be deliverable through the use of 'micro renewable' solutions. Having considered the specific characteristics of new development in this area, the Study identifies delivery of a Combined Heat and Power and District Heating network (CHP/DH) is sensible post-2013, and essential post-2016. Whilst site specific micro-renewable solutions may be able to meet the short term Building Regulation requirements for emissions reductions, their implementation will reduce the effectiveness and viability of a CHP/DH network in the longer term.</p>
		<p>5.26</p>	<p>A CHP system can be fuelled by biomass (renewable energy technology) or by natural gas (low carbon technology). It can also incorporate other technologies</p>

		<p>5.27</p>	<p>as part of a wider network. To set the foundations of this low carbon network it is likely that natural gas CHP will be the initial preferred option as a well-established proven technology, with low capital costs and small development footprint.</p> <p>Gas CHP is a low carbon technology with the potential to deliver substantial reductions in the City Centre's carbon emissions. In the future other fuel sources such as biomass could be 'plugged' into the CHP/DH system, once the initial infrastructure is in place. This proposal will bring considerable benefits to new developments in terms of providing a cost-effective way of meeting increasingly challenging Building Regulation requirements as well as providing cheap low carbon energy and heating for future occupants. CHP can also offer the benefits of being able to deliver carbon savings for existing buildings, where building fabric improvements may be difficult to achieve. It may also deliver other improvements, including reduced cost of boiler replacements, and lower revenue costs.</p>
		<p>5.28</p>	<p>This proposal will be implemented on a phased basis, and delivered by an Energy Service Company (ESCo) in partnership with the City Council and developers. The role of the ESCo will be to develop, manage and maintain the CHP/DH infrastructure and to provide energy services to customers across the City Centre and University area. Further work demonstrates that there is the potential to establish a first phase of the DH network based upon existing heat and power requirements for customers around the University of Plymouth campus.</p>
		<p>5.29</p>	<p>Given the lead in time that will be required for establishing the ESCo, and associated CHP/DH infrastructure, this work will need to be completed early in the plan period to ensure that it provides</p>

			the required foundation that will facilitate the roll out of 'carbon compliant' development.
		5.30	The exact specification of the CHP energy centres required to support a commercially viable energy network will evolve according to local market conditions, but to deliver the desired carbon savings from the network some proposals will be encouraged to accommodate energy plant that supports the delivery of heat and power to adjoining sites/proposals. Key proposals that have the potential to support this phased rolled out are therefore encouraged to safeguard land for this purpose.
		5.31	The current expectation is that the area is likely to require a number of energy centres to support the phased roll out of the district heating and cooling network. It is currently anticipated these will be focused around Colin Campbell Court, Cornwall Street and North Cross. Proposals in these areas are therefore encouraged to safeguard land that could support this kind of use.
		5.32	The Council will proactively support the establishment of a City Centre and University ESCo, and then support the ESCo in the implementation of the necessary CHP/DH pipe infrastructure. This support will come through the planning process and when the Council carries out transport or public realm works. Developments will be encouraged to connect to the network and to provide financial contributions towards its establishment".

Attachments:  
 Annex 2  
 Revised Diagrams and Proposals Map