

## Response to the City Centre and University Area Action Plan

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12th January 2010

### Summary

The aim of this submission is to look at the City Centre and University Area Action Plan (AAP) from the perspective of ward councillor and also as the shadow housing lead. This means that areas of policy incongruity will be highlighted drawing upon statements within the AAP against those of the Core Strategy and the Plymouth Housing Strategy which states a clear need for social and affordable housing.

### 1. The Statement of Community Involvement

Whilst a long standing (since 1973) and relatively vigorous residents associations sited 3 miles away from the city centre (The Stonehouse Residents Association) was approached to work with the charity "Planning Aid" at one of their regular quarterly meetings in public, the same degree of community engagement was not successful to the population density actually living within the neighbourhood of the city centre, specifically the residents of council-owned flats at Colin Campbell, Morley and Harwell Courts. The Plymouth Federation of Tenants and Residents (PETRA) which was funded at the time of the consultation by the city council have staff skilled in community development and engagement and are sited actually within the flats at the Harwell Centre but were not actively engaged in any consultation for and on behalf of residents. Housing officers with responsibility for housing within the flats were also not involved in accessing/assisting the consultative process. It is worth noting that people living within the ward who may work or study at the University may have been disadvantaged by the timing of the consultation since it commenced within the summer holiday period. I would consider that all of the above would have a stake in the area and ought to have been more actively included, including those who are viewed as traditionally "hard to reach".

### 2. Internal Consistency

Internal consistency is seriously compromised by the AAP's attempt to justify the waiving of the 30% social/affordable housing component. The AAP (2.21 p 11) sets out the need to achieve three key tasks: the addressing of problems which have been identified as harming commercial prospects, the establishment of key principles needed to begin the transformation of the city centre, giving heritage due regard and the provision of a framework which is flexible and adaptable to changing circumstances and is able to deliver against aspirations and new ideas. There is also an identified need (2.20 p10) for a broader range of activities including the introduction of more evening uses. None of these aims can justify the complete waiving of social/affordable housing, in fact their inclusion in terms of balanced and sustainable communities would provide a valuable contribution.

The Core Strategy is cited (p12) Area Vision 3 - Plymouth City Centre - "...well connected to surrounding neighbourhoods as well as *being a safe place of quality in which to live*" (my emphasis), this should not preclude social/affordable housing. The AAP2 also cites the 1943 *Plan for Plymouth* "...here it will be possible at a step to pass from the spacious new centre into the homely old streets" . Whilst the AAP states that it sets out this as a "fully realised concept", page 13 provides no mention of people's housing yet states the city centre will have a true diversity of character *not on offer anywhere else*. On this latter point that could well be right.

(5.18 p 27) The clarity of the Core Strategy is set out in that all development within Plymouth should contribute to the creation of sustainable linked communities and there is the laudable aim within the AAP of increasing the number of people living and working in the city centre with following bullet points on p 28 supporting this view but then there is an immediate and

apparent contradiction (5.19 p 28) to which the reader is informed that due to the competing needs of the city centre and the value of the land it may not be possible to provide all the community facilities within the AAP. Whilst the former is understandable in terms of economic and commercial use as a regional centre, the city council is the land owner. Apparently "...City Centre living will be by definition a more dynamic and intense experience for residents, and not all social groups may wish to live in such an environment. It may not therefore be possible to create a truly balanced community in social terms....". This statement is based upon the assumption that the proposed multi-million pound Millbay Dock development where "links to facilities will be created and strengthened" will be a less intense, vibrant and dynamic experience for residents and also for those living in Stonehouse where "links" will be also be created and strengthened.

Strategic Objective 4 (pp 37,38) Bullet point 6 includes Colin Campbell Court as strategically important for a range of uses which includes housing but on page 38 housing is one of the aspects that "may" be included in the form of new homes (7.14) with Morley and Harwell Courts left to the bargaining powers of developers and officers via the tariff system for planning gain. (p 39) Policy Proposal CC8 Development proposals will be exempt from the Core Strategy Policy to provide 30% social housing.

(7.11 pp 40, 41)"Redevelopment proposals could provide a sufficient amount of houses to trigger the Core Strategy requirement for 30% of homes to be affordable. Due to the complexities of this site and the difficulties which *may* (my emphasis) be encountered in attempting to assemble a viable development proposition, the Council will waive the Core Strategy requirement". Colin Campbell Court is a strategically important site, and the benefits to the West End, City Centre and city as a whole of having successful, attractive, landmark development here justify a relaxation of affordable housing requirements". The very factors that have been formerly presented as advantages within the document are now seen as a justification to waive the 30% for social/affordable housing. It needs to be questioned why good quality, well designed, sustainable and well managed housing cannot be incorporated via a percentage of social/affordable housing for people.

(7.13 p 41) Residents are apparently very happy living in Morley Court and Harwell Court and the only supporting evidence to justify this comment on "happiness" is "evidenced by the high numbers of residents who have bought their leases from the Council. It is one of the few areas of existing residential use within the City Centre, and is a highly sustainable location next to facilities and shops in the City Centre Centre and "in" Stonehouse on the far side of Western Approach". The justification for the waiving of the 30% or presumably less than 30% social housing seems to be negated by these statements as does the fact that the SCI selected methodology for engagement failed to capture the happy leaseholding residents, quite possibly because the leaseholders live elsewhere and let their properties via the private letting market. This implies that secondary data analysis was used to measure "happiness" or possibly that heritage includes the application of Benthamite principles for social housing of the greatest happiness for the greatest number of people who are leaseholders. It is of concern that an area of longstanding population density containing family and kinship networks within the city centre appears to be somewhat overlooked in terms of civic benefit and, returning to 5.18 p 27 may not wish to live in an area destined for vibrancy, dynamism and intensity.

Cornwall Street (CC11 pg 46) is earmarked for housing, 700 new homes (bullet point 4) to be accommodated within the development, including flats, apartments and townhouses possibly including roofgardens".

Again, all the development proposals listed in CC11 will be exempt from the Core Strategy policy to provide 30% affordable housing even though the scale of the development would actually trigger that requirement relying instead upon some urging of developers just to look at whether an element of housing provision can be affordable. Again, the benefits the redevelopment of Cornwall Street will bring to the entire city are used as a justification to "relax" affordable housing requirements.

### **Housing for Students (9.12 p 55) The Northern Triangle**

Housing for students within the ward for some time consisted of traditional housing lettings to students. Page 60 10.9 cites that the council is aware of concerns expressed about the expansion of the student population into the neighbouring areas of Mutley and Greenbank but offers little than to demarcate these neighbourhoods as "outside the City Centre and University AAP...and in many cases are caused by existing houses being let to students and may therefore not be a matter which can be controlled under planning powers...". Unlike Stonehouse and Millbay then there are to be no "links" to be not only created but also strengthened. Whilst it may be the case that housing that contributes to problems for occupants (and neighbours) "may not be a matter which can be controlled under planning powers, the same Council does have powers within its private sector housing remit e.g. the licensing of houses in multiple occupancy as just one example quite apart from environmental including health powers. Since students are to be living in the West End and area to the north of Mayflower Street - the presence of numbers of students will assist in increasing the activity and vibrancy, complementing other proposed activities and relieving some of the pressure on properties in other parts of the city". Presumably the pressures of students are felt to be more detrimental to neighbourhoods in the east side of the city than in the west where people must be deemed to be more accepting. This is incongruous. Geography cannot effect tolerance or the ability to probably withstand aspects such as dynamism, vibrancy and the other intangibles .

### **The Housing Context**

The average house price for the city is £157,000, requiring an income of £39,764. The cheapest homes are £32,000 - the average wage is £17,688. Over 51% of newly formed households are unable to afford home ownership. In Plymouth 24.5% of the working population earn less than £10,000 and 28.5% earn between £10,000 and £20,000.

In 2007 the overall shortfall of affordable housing per year in Plymouth is estimated to be 1,848 - a 26.9% increase on the previous year.

50,000 children and young people under the age of 17 years live in the city - 20% of the population.

Stonehouse in St Peter and the Waterfront ward has the worst housing in the city.

Plymouth's Strategic Objectives include - Supporting independent living, narrowing the gap between communities and new affordable and decent housing.

Economic activity rates are below the national average and are consistently lower than the regional average. A range of housing is needed to meet the needs of current and future employees.

(Plymouth Local Economic Strategy 2006 - 2012 and Beyond and "Rooftop Conversation" - Plymouth Housing Strategy 2008 - 2011)

### **Conclusion**

Compartmentalising the inner city is probably deliverable but hardly justifiable whether this is students, leaseholders, prospective buyers of properties or those seeking social/affordable housing (with or without roof gardens and sea views). To designate whole areas of the inner city as a no go area for social and affordable housing is not congruent with sustainable communities. Plymouth does have a proud heritage within the inner city because of its economic and social diversity, its garrison heritage and its relatively new role as a University city. That specialist housing is needed for large numbers of predominantly young students and others is recognised within the document but adaptability should be a key tenet of the design of the housing so that those students who want to remain and contribute economically

to the city can more easily do so via homes built with designed flexibility that can be adapted over the course of a lifetime for a city that is changing faster and faster over time.

There is internal inconsistency within the document in that arguments used to justify the relaxing or elimination of the 30% principle are applied in other parts of the document to support housing, although the tenure changes. There is the sense, at times, that problems of integration amongst students and residents outside of the AAP are "not planning issues". This does not auger well for the City Centre and University AAP which would be critically dependent upon the notion of partnership underpinning planning, regeneration, commercialism, leisure, housing and changes of use for the promotion of culture and heritage within the council departments themselves. The highlighting of interdepartmental difficulties as "not planning" may be honest, but hardly a unique selling point to developers and potential residents.

The economy is a difficult one for those who job it is to regenerate the city is recognised, however, housebuilders in a cold funding climate are turning more and more to social housing development in order to save jobs and retain skills and the companies themselves allied to a large workforce of local labour including migrant workers within the city. It is worth noting that in yesterdays' edition of "The Herald" there is to be a 170 bed hotel, a budget hotel of 140 rooms, along with 182 student apartments and "an impressive" tower of 109 apartments for sae with shops underneath " There are no plans for social housingwith developers Devington being "delighted" at the waiver of 30%. Whilst there may be some justification to waiver the 30% in some cases the accent and focus within the document must be significantly altered to bolster and support the aspirations of those who live in Plymouth both now and in the future rather than to give way too easily to the needs of developers in the short term. This knee-jerk reaction to recession effect along with a sense of bias and imbalance to social and affordable housing needs to be be redressed.