

Ref. NW/PLG

Submission of Evidence from Plymouth Labour Group to Public Examination of the City Centre and University Area Action Plan

The Plymouth City Council Labour Group is pleased to acknowledge much of the City Centre and University AAP and supports many of the proposals therein. However, as previously outlined in responses to the Consultation there are still areas of concern. We are pleased to see that the Public Examination has picked up on these concerns and have limited our submission of evidence to the points raised for the Public Examination.

Justification;

The Plymouth Labour Group does not consider that the AAP contains sufficient explanation of how the preferred approach is arrived at. In particular, we would argue that there is insufficient and contradictory evidence to justify a relaxation on some sites for a requirement of at least 30% affordable housing. Indeed it can be demonstrated that lack of Affordable Housing on strategic sites of the City Centre and University AAP Action Plan is not supported by the Council's own priorities and strategies. The evidence presented for this assertion is contained within the following documents.

Core Strategy – 2006 – 2021 – States that there should be at least 30% affordable housing. P.107 details the evidence leading to this requirement. We argue that there have been no material changes to the positions outlined in this document to justify a relaxation of housing requirements in the city Centre and University Area Action Plan (or indeed in other AAPs, such as Central Park). If the trend is now to abandon this requirement for 'strategic sites' then there would appear to be a mismatch between the aspiration in the Core Strategy and the delivery in Area Action Plans for certain Areas. It is not helpful to community cohesion or to narrowing the gap to have social housing concentrated in areas of the City already working to relieve the legacy of years of deprivation.

Plymouth Housing Strategy 2008 – 2011 pgs. 3, 4 and 8. This stresses the importance of affordable housing to the council, especially to address the

widening shortfall. Chapter 2 of this document centres on affordable housing and the importance of housing to Plymouth's growth and well-being agenda. The trends section in appendix 2 is additional corroboration.

Plymouth Local Economic Strategy 2006 – 2011+ shows the planned economic development strategy in the Plymouth Area and the need for Economic Development and Skills Development to be central to future prosperity of Plymouth. This includes the development of SMEs and Cultural and Creative Industries, together with the development of knowledge creation. The importance of the University and the retention graduates to live and work in Plymouth cannot be over-emphasised. The lack of a range of affordable and other socially rented accommodation and live/work space in the City Centre will inhibit progress in this key area.

A Vision for Plymouth – MBM Architects (The Mackay Plan). – This always envisaged that the City Centre would be re-vitalised. P.43 -46 refers to the City Centre and its crucial role. It advocates a 'positive creation of a mix of land uses' If there is to be land use for housing in the City Centre, we argue that 'at least' 30% should be affordable housing.

Plymouth Local Area Agreement Housing Target NI 154 Target 2008-1. This shows that in the Draft RSS SR35/Table 4.1 the increase needed in housing allocations and the Secretary of State's revision. The table of ***Average Potential Completions per annum 2008 – 2011*** and subsequent predictions show that there is to be a reduction in housing completions and that the current recession will impact on Plymouth. Successful schemes in the East End and in Devonport (and Devonport features largely in predictions for future completions in NI 154) highlight the advantage for neighbourhoods and their communities in affordable housing. The Labour Group questions the premise that the City Centre and previously the Central Park Area Action Plans do not require affordable housing as part of the identified strategic sites.

Plymouth City Council – Corporate Plan 2009-12. p.33 – 49 details the Corporate Improvement Priorities. Cip 4 – Narrowing the Gap; Cip 5 Better and more affordable housing and CIP12 on Sustainable Growth are of special

relevance. These are long-term priorities and any Area Action Plan should take note of these

Effectiveness

We consider that the AAP should examine how the Policies relate to adjacent areas to the City Centre, but would ask that this includes an examination of the current and proposed Private Rental Sector and in particular HMOs. In particular, we would argue that the recent developments in Millbay and Devonport indicate the extent to which Socially Rented and Affordable Housing options are essential to health and wellbeing.

It is worth considering the ***Audit Commission's Plymouth Area Assessment OnePlace (November 2009)*** overview of local public services. This shows that many homes rented from private landlords are in poor condition and that people who live in parts of the city that are less well-off than others have worse health, educational qualifications and housing. The report states that ***'more needs to be done to close the gap between the better and less well off areas of the City.'*** The City Centre AAP would seek, perhaps to 'hide' these unpleasant truths by creating a sterile retail environment with housing for the well-off in the City Centre, rather than extend the mix and range of affordable housing to improve the health and life-chances of residents. This in conjunction with the documents outlined above. The Policies and Proposals should contain more detail in relation to the housing numbers expected, including affordable housing and student accommodation. This relates in particular to studentification, HMOs and the private rented sector.

We do not think that the AAP brings together the plans and proposals of all relevant bodies to achieve implementation. An examination of the Local Strategic Partnership's stretch targets linked to the recent Audit Commission Report shows that there is a need for more focus on narrowing the gap between the more well-off and the least well-off neighbourhoods. The City Centre AAP appears to ignore this evidential base. The absence of high quality affordable housing will not encourage families to live and work in the City Centre and University Area. The upgrading and further development of

housing in Harwell Street and around the City Centre is somewhat vague and inconsistent.

There is an omission of recent work on cultural and creative industries together with a strategy to encourage Small and Medium enterprises into the City Centre. (***Plymouth Cultural Strategy and Plymouth Sustainable Community Strategy***) This will eventually have a detrimental affect on the City's vibrancy. Again, the evidence for this is contained in the documents mentioned above.

Further, insufficient guidance to Public Realm with regard to Green Space and family friendly place-space is given in the document. This may be due to the lack of focus on affordable housing and on place-making from the point of view of residents and people who wish to live and work in the City Centre.

Pages 66 and 79 of the ***Plymouth Housing Strategy*** refer to the council's need to assess the impact of Studentification on the City. The expansion of houses in multiple occupation to meet student need has sometimes led to tensions between students and long-term residents. Whilst we are pleased to see a move in the AAP to house more students in the City Centre, we would also like there to be a move to house families in the City Centre through affordable housing policies. There is a need to provide housing for families in this whole area and recognise the contribution families can make to the sustainability of a community. There is already evidence that fewer families are living near the University. This, in conjunction with the poor quality of much of the private rental sector and the problems associated with Houses in Multiple Occupation are matters which need to be taken into account, not only on the effectiveness of the City Centre and University AP but also in regard to the delivery of the ambitions and aspirations for the whole City Centre and University AAP.

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