

STATEMENT 07

City Centre & University AAP Public Examination

Document Number:	PCC CC&UAAP 07
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Title:	Should the Policies/Proposals contain more detail in relation to the housing numbers expected, including affordable housing and student accommodation
Examination Session:	26th January 2010

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Issue to be Examined

1. The Inspector has asked the question, “Should the Policies/Proposals contain more detail in relation to the housing numbers expected, including affordable housing and student accommodation.”
2. The Council believes that the AAP is sound as submitted. It contains an appropriate amount of detail, for a strategic document, regarding the housing numbers expected to be delivered by the proposals set out in the plan, given the following points:
 - The AAP sets out a number of development proposals in the City Centre, all of which are mixed use, commercially lead opportunities. As part of these opportunities, housing may be an element of the mix but will not be the main component. This has implications for assessing the precise numbers of houses which could be delivered by each proposal, at this time.
 - Where it has been possible to produce an estimate of how many dwellings could be provided, as part of the development proposals, this has been included in the AAP – for example in Proposal CC11. This has only been done where there is specific evidence to back up the estimates.
 - Clearly the Council is aiming to achieve much greater numbers of people living in the City Centre, as part of its policy of creating a sustainable community. As set out in Council Statement 02, the AAP will deliver this by:
 - Highlighting where in the City Centre housing could be provided, with numbers given where possible,
 - Setting out in Policy CC04 that the creation of sustainable communities, including the provision of a range, mix and type of housing, is a key policy of the AAP and that all development should contribute to meeting this policy where possible,
 - Preparing, in due course, as the AAP proposals develop into Planning Applications, a range of more detailed delivery plans and documents, such as masterplans and site briefs, which will set out where and how housing will be provided in accordance with the AAP’s Policies and Proposals. This approach could be further clarified in the AAP, and Council’s Statement 03 proposes some suggested clarifications which the Inspector may wish to use.

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- The Plymouth Strategic Housing Land Availability Assessment (SHLAA) has now been prepared and sets out where housing could potentially be provided. This will be updated each year and will monitor and quantify housing provision in the City Centre, as well as for the rest of the city. The latest information from the SHLAA is included in this Statement.

Context of the AAP and Nature of the AAP Proposals

3. Chapter 3 of the City Centre and University Area Action Plan sets out a wide range of strategic objectives. Its key role is to set a vision and framework for the significant change proposed in the City Centre - which will deliver a truly regional centre in Plymouth by 2021. The main focus of the AAP is not, therefore on housing delivery, but on the developments which will create a transformational change in the City Centre.
4. This is not to say that the provision of housing is not important to the delivery of this change in the City Centre. Clearly it is in terms of achieving one of the Council's objectives for developing a new sustainable community, as part of the proposed changes for the City Centre. The AAP confirms this in Policy CC04, stating that it is important to see more people living in the City Centre as part of the creation of a sustainable community. For this reason, the creation of opportunities for housing development in the City Centre is an aim which is embedded into many of the AAP's strategic objectives.
5. Housing numbers in the City Centre will, however, be delivered as a part of the proposals which will drive the changes in the centre, rather than as the driving force behind the change. For this reason, there is not a distinct strategic objective focused on housing delivery, and the precise numbers which could be delivered have not been quantified in all cases. It would be expected that the numbers which will be delivered will be set out in detail in further documents to be prepared following the AAP, and in detailed site briefs which will set out the mix of development to be provided on specific proposals.
6. In terms of priorities, it may also be that the provision of a given number of dwellings on specific proposals is given a lower priority than other AAP objectives, such as creation of a high quality place and a commercially successful scheme. In such situations, the flexibility of the AAP to lead a process to create the best development for the City Centre could be compromised by using prescriptive housing targets.
7. It should also be noted that the strategic proposals in the AAP are for mixed use developments which will be lead by non-housing, usually commercial uses. As explained in Council Statement 02, if housing is part

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of the mix which is assembled for these proposals, the precise numbers which will be delivered will only be quantified once the complete scheme has been worked out and been subject to development appraisal. Generally, this would logically occur at a later stage in the development process than the AAP stage.

8. The main concern of the City Centre and University AAP is to put in place the building blocks to create a renewed, high quality City Centre, providing a thriving commercial centre that is of regional significance. Therefore, the focus should not be on setting out housing targets to be met by the end of the Plan Period. Given this, and the above considerations, it was decided not to set out precise housing figures for all sites, especially not for the three strategic sites, as these may not reflect the final amounts of housing which could be provided in the development mix and could inhibit development opportunities.
9. The exception to this is Proposal CC11, where an indicative amount of housing has been set out in the proposal. It should be noted that this a broad estimate of housing numbers based on evidence set out in the Future Direction report, which is part of the evidence base. The Council is keen to see an element of housing provided by this particularly important proposal, and the figure used is commensurate with the broad numbers provided on major City Centre schemes in other parts of the country. The wording of the policy, however, makes it clear that the emphasis of the proposal is the delivery of a commercial development which will create a step change in the quality of shopping in the City Centre, and gives flexibility to the housing requirement.

Monitoring Housing Delivery and Further Work

10. Clearly the AAP is setting the principles of how, and broadly where, housing of all types should be provided in the City Centre. It does not set out the detail of precisely how many dwellings, affordable housing or student dwellings will be provided over the plan period, as to do so would be to give a potentially inaccurate picture of change in the City Centre.
11. It is similarly clear that, as work progresses on the City Centre proposals and as proposals are implemented, the Council will monitor the delivery of numbers and types of dwellings in the City Centre. This will take place in the following ways:
 - The Council has recently published its Strategic Housing Land Availability Assessment. This document has been produced particularly rigorously and sets out how the Council will achieve its housing targets for the City and its 5 year supply. It will be updated on a rolling, annual basis, and therefore will reflect housing numbers

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which have been achieved in the City Centre, and housing sites with numbers which are set out in detail. It will therefore be a useful tool for understanding how the Council's objectives set out in the AAP are being delivered.

The SHLAA (2010 update to the SHLAA as set out in the 2009 Annual Monitoring Report) shows that there are sufficient sites in the city to deliver 17,394 dwellings by 2021, against the Core Strategy target of 17,250 dwellings by 2021. The SHLAA does take account of City Centre sites, but due to the complexity of the path to delivery on the strategic proposals, it does not make an allowance for these sites until after 2021. This matches the analysis set out in Council Statement 02. Therefore, of all the housing identified in the AAP, only 159 dwellings are identified as being deliverable before 2021 by the SHLAA. It is therefore not necessary for the Council to rely on housing sites in the City Centre to meet its 5 year supply or to deliver the Housing targets for the City as a whole. It should be noted that the SHLAA sets out a constrained supply of housing, taking full account of the current difficulties in the housing market (see Council Statement 03).

- As part of the work the Council plans to do to produce a sequence of steadily more detailed documents and delivery plans plotting out the process of the change in the City Centre, it is proposed to set out in detail how and where housing numbers will be provided in the City Centre. This document can be produced at a time when monitoring through the SHLAA and planning of more detailed development proposals should have provided some more certainty regarding housing numbers. This approach is set out in more detail in Council Statement 02.
- This approach will also mean that housing numbers will be given further certainty as site masterplans and site briefs are produced, both by the Council and potential developers. These numbers will clearly be reflected in future updates of the SHLAA.

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Affordable Housing and Student Housing

12. The reasons for not including more detail relating to affordable housing and student housing are similar to the points made above regarding housing numbers in general. The AAP sets out principles regarding the provision of affordable housing and student housing, but does not set out detailed numbers, leaving this for later stages of plan making and monitoring. It should be noted that:

- The Council's approach to affordable housing is set out in Council Statement 02. Given this approach, it will clearly not be possible to give accurate, evidence based figures for the amount of affordable housing to be provided in the City Centre until the later stages of plan making are reached. Attempting to put figures into the AAP would not be based on good evidence, is not necessary to show the Council can meet its affordable housing targets and would harm the flexible approach set out in the AAP and in Council Statement 03.
- Student Housing is clearly an element of the development proposals in the City Centre. Several recent consents in the City Centre contain significant amounts of student housing and the University clearly has a requirement to provide accommodation for all of its first year students. It is also a part of the Council's solution to issues in neighbourhoods adjacent to the University, caused by the increase in numbers of houses occupied by students. Student housing is not, however, an element of housing supply which can be monitored by the SHLAA nor the AMR. It is therefore difficult to count it against the housing supply calculations in the SHLAA.

The Council clearly see student housing as part of the 'range mix and type' of housing to be provided in the City Centre and would see the creation of student units as contributing to the creation of a sustainable City Centre community. Similarly to regular housing, however, it is not possible to quantify exactly how much student housing will be provided until a more detailed stage of planning City Centre proposals is reached.

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Conclusions

13. The Council believes that the City Centre and University AAP is sound as submitted.
14. The AAP sets out an appropriate amount of detail regarding the numbers of houses, affordable houses and student accommodation, given the role it sees the AAP play in guiding change in the City Centre:
 - Housing provision is an important element of the changes envisaged in the City Centre, but is only one of a number of priorities. The Council does not want to hamper the AAP's flexibility by setting firm targets which may be undeliverable in the context of assembling large mixed use commercially viable schemes,
 - The AAP therefore sets out principles to guide the range, mix and type of housing required to create a sustainable community within a successful City Centre. Putting in place too much detail would actually weaken the AAP's ability to do this.
 - The Council will be producing a range of delivery plans which will put in place progressively more detail regarding the development priorities and proposals set out in the plan. Housing numbers will be one of these details which will be firmed up as development proposals are properly assembled.
 - The Council will also monitor the amount of housing being provided in the City Centre as the proposals are progressed, through the annual update of the SHLAA and the AMR. The Council is therefore properly using the Plan, Monitor, Manage approach to housing delivery in the City Centre. It should be noted that the delivery of housing in the City Centre is not needed for the Council to meet its city-wide housing or affordable housing targets.