

## North Plymstock AAP Public Examination

<b>Document Number:</b>	<b>PCC PPS3 compliance</b>
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<b>Title:</b>	<b>Statement on the extent to which the submitted North Plymstock AAP complies with PPS3</b>
<b>Examination Session:</b>	<b>General Paper</b>

### Summary

1. This statement comments on the extent to which the North Plymstock AAP complies with the requirements of PPS3.
2. Plymouth's Core Strategy is in compliance with PPS3. Therefore since the North Plymstock AAP is in conformity with the Core Strategy, it follows that the AAP is also in general compliance.
3. In the Council's opinion, Plymouth's LDF already complies with the objectives of PPS3 and has put in place a robust planning framework to deliver sustainable housing within and adjoining the city. This is demonstrated throughout the submitted Core Strategy and through the Council's planning decisions.
4. However, while plans that are at an advanced stage of preparation need only have regard to the new requirements, none the less the Council believes that with minor adjustments full compliance with the details of PPS3 can be achieved. Changes to this effect were put forward to the Core Strategy Examination in respect of the more strategic housing issues. Similar minor adjustments to the AAP are put forward in this statement.

### Context

5. Planning Policy Statement 3 (PPS3) Housing was published in November 2006. It sets out the Government's policy on planning for housing and should be taken into account by local planning authorities in the preparation of their Local Development Documents (LDDs). In relation to emerging LDDs, PPS 3 states that Local Planning Authorities (LPA):  
*"... should consider the extent to which emerging Local Development Documents and Regional Spatial Strategies can have regard to the policies in this statement whilst maintaining plan-making programmes."* (Par. 6 refers)
6. This is expanded further in the letter to LPAs that accompanied the publication of PPS3. It states:  
*"As far as is practicable, changes should be made to emerging spatial plans so that they reflect PPS3 policies, but this should not be done at the expense of putting in place an effective policy framework for housing as quickly as possible. Where it is not practicable for changes to emerging plans to be made, local planning authorities and regional planning bodies should set out the steps they will be taking to address any issues arising from this PPS through an early plan review."*
7. This statement assesses the extent to which the North Plymstock submitted AAP complies with the requirements of PPS3 and identifies areas where minor adjustments can be made, as well as whether there is a need to consider an early review of the plan. It also covers paragraph 7 of PPS3 which states:  
*"Local Planning Authorities will need to assess and demonstrate the extent to which existing plans already fulfil the requirement set out in this statement to identify and maintain a rolling five-year supply of deliverable land for housing, particularly in connection with making planning decisions"*.

### The Council's response

8. The Council's response to PPS3 is set out in the following sections, in terms of comments on:
  - 1) the extent to which the submitted AAP meets the requirements of the government's housing policy objectives (paragraph 9 of PPS3 refers)
  - 2) compliance with the concepts and principles designed to achieve these objectives (paragraph 11 of PPS3 refers)
  - 3) conformity with the detailed requirements of PPS3 (paragraph 10 of PPS3 refers)
  - 4) Suggested adjustments to the North Plymstock AAP

### 1. Meeting the government's strategic housing policy objectives

- 1.1. The Council considers that the Plymouth LDF is fully compliant with the spirit of PPS3 and the Government's four housing and planning objectives, as stated in paragraph 9 of PPS3. These are as follows.

**To achieve a wide choice of high quality homes, both affordable and market housing, to address the requirements of the community.**

- 1.2. The strategic approach is to provide a mix of housing opportunities encompassing the need for urban renaissance of some of the city's older communities, complemented by the need to provide family housing on both regeneration sites, and on greenfield sites within and adjoining the city boundary. North Plymstock AAP fulfils part of this obligation in that it proposes development of a mix of new housing on predominantly brownfield sites.

**To widen opportunities for home ownership and ensure high quality housing for those who cannot afford market housing, in particular those who are vulnerable or in need.**

- 1.3. The Council's approach to the provision of affordable housing is based on a robust and up-to-date evidence base provided by the Plymouth Housing Market and Needs Assessment 2006, This study involving neighbouring Local Authorities is one of the first to be completed in the south west and demonstrates the Council's commitment to a partnership approach, involving planning and housing departments together with the private sector and other stakeholders, in preparing its LDF. The North Plymstock AAP provides for in the region of 2500 homes of which over 650 are to be affordable.

**To improve affordability across the housing market, including by increasing the supply of housing.**

- 1.4. The City Vision commissioned by Plymouth 2020, the Local Strategic Partnership, sees the city growing from 250,000 to an eventual population of some 300,000 to 350,000, although this is only likely to be achieved beyond the time period of this plan. The submitted Core Strategy sets out the

framework for the long term delivery of this level of growth in housing and the associated economic and infrastructure development. Recognising that these levels of growth are above Structure Plan and existing RPG levels, the city has been awarded New Growth Point status. The North Plymstock AAP plays a key role in delivering housing development as part of this strategy

**To create sustainable, inclusive, mixed communities in all areas, both urban and rural.**

- 1.5. Creating sustainable linked communities is a key objective of the Plymouth LDF. It provides the 'golden thread' that links the various elements of the plans together. Policies for all areas of the city are based on a series of Sustainable Neighbourhood Assessments which identify the key sustainability needs and opportunities for each community. In the North Plymstock AAP the proposals incorporate the need for sustainable urban design, local distinctiveness, providing locally for the daily needs of residents and improving quality of life. Objective 1 of the AAP sets out the desire to achieve a "high quality sustainable new neighbourhood".

## 2. Compliance with the Government's key housing principles

- 2.1. The Council's approach is also considered consistent with the Government's key principles as set out in paragraph 11 of PPS3. These are as follows:
- **Sustainable development** – creating sustainable linked communities is a fundamental objective of the Plymouth LDF and sustainable neighbourhood assessments form a key element of the evidence base.
  - **Visionary and strategic approach** – the Plymouth LDF follows the vision promoted by the city's Local Strategic Partnership (LSP). It provides for the city's long term growth through a sustainable, quality agenda, in order to create sufficient critical mass to support the level of services needed.
  - **Market responsiveness** – Plymouth and its sub-regional partners have recently published one of the first Housing Market and Needs Assessments in the region. This study has been undertaken in partnership with the private sector and neighbouring authorities, providing a robust evidence base that underpins the plan.
  - **Collaborative working** – Housing and Planning Departments, both within the city and between neighbouring authorities, have worked closely together on both policy formulation and housing delivery. This has been particularly evident in terms of the joint working between Plymouth and South Hams, but has also included the other neighbouring authorities. For example, both the Housing Market and Needs Assessment and the Joint Study Area report were prepared as evidence base for the Plymouth and South Hams Core Strategies as well as joint sub-regional inputs to the Regional Spatial Strategy. In addition, Plymouth and South Hams have worked in partnership to coordinate the planning and delivery of the Sherford new community and the new development at North Plymstock particularly with reference to a common sustainable transport infrastructure.

- **Evidence-based policy approach** – a wealth of evidence has been commissioned to underpin the housing policies and other aspects of the Plymouth LDF. Key housing evidence base documents include the Urban Capacity Study, Plymouth Housing Needs Assessment, joint sub-regional Housing Market Assessment, Urban Character Assessments and Sustainable Neighbourhood Assessments.
- **Outcome and delivery focus** – a detailed implementation schedule is included within the AAP. In addition to this the Council is preparing a detailed Housing Delivery Action Plan which will assist in overcoming any barriers to implementation of the development and supporting the timely delivery of infrastructure.

### 3. Conformity with the detailed requirements of PPS3

- 3.1. The main sections of PPS3 identify the outcomes that the Government expects the planning system to deliver. These are summarised in paragraph 10 of PPS3. The following paragraphs explain how the Plymouth LDF and in particular the North Plymstock AAP comply with them.

#### **High quality housing that is well designed and built to a high standard**

- 3.2. Achieving high quality development appears at the forefront of the submitted Core Strategy with its own objective and a detailed design policy. Other aspects of good design including amenity space, biodiversity and safety are covered by more detailed policies in the relevant sections of the plan.
- 3.3. The Council's planning team includes a number of urban designers who advise on both policy and planning control matters. At Sherford, the design of the new settlement is being informed by the Prince's Trust Enquiry by Design process.
- 3.4. In the AAP, Objective One, makes it clear that the development "will be an exemplar of sustainable urban design and reinforce local distinctiveness." The detailed proposals all refer to the need to provide a balanced and sustainable neighbourhood, using the standards and principles of sustainable urban design. For the housing that will form part of the Sherford mixed use settlement there is a requirement for a sustainability checklist to be prepared and for all buildings to be subject to a BREAAAM assessment and achieve a rating of excellence with all dwellings to achieve an Ecohomes rating of Excellent. A Design strategy and Design Codes will provide a framework for the detailed design work.

#### **A mix of housing, both market and affordable, particularly in terms of tenure and price, to support a wide variety of households in all areas, both urban and rural.**

- 3.5. The submitted Core Strategy seeks to provide a mix of housing across the city to provide for both in-migrants, as well as household formation generated from within the city itself. Demographic trends and profiles at both regional and local levels have informed this approach and the recent Housing Needs and

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Housing Market Assessment is a key element of the evidence base. Housing growth has also been informed by the recent revised household forecasts.

- 3.6. The Council's approach is to provide housing opportunities on both greenfield and brownfield sites, which both meet the identified range of needs and demands, as well using housing growth in support of the city's urban renaissance agenda and helping to build sustainable linked communities.
- 3.7. The LDF sets out an overall affordable housing target, which goes some way to meeting the need identified in the Housing Needs and Market Assessment, but equally recognises the need for successful regeneration, the limited capacity of the system to deliver affordable units and the other pressures placed on development sites such as the need for contributions to infrastructure and the overall viability of development on each site.
- 3.8. The North Plymstock AAP provides for approximately 2500 homes of a variety of tenures and house types, of which in excess of 650 will be affordable.
- 3.9. Amplification of affordable housing policy will be contained in an SPD. This should include setting more detailed targets for social rented and intermediate affordable housing, the type and size of property and all other relevant information. Whilst the AAP provides the broad framework for type and tenure, of housing, the Planning and Housing Departments will work closely with the developer over the precise details, both before and during the submission of detailed planning applications

### **A sufficient quantity of housing taking into account need and demand and seeking to improve choice.**

- 3.10. The city's aspiration is to increase the city's critical mass to a level which supports the service provision needed, through a sustainable and quality agenda. This approach has been guided by the quantum of development identified in the emerging RSS, which in turn was informed by an extensive Joint Study Area investigation into the quantity and location of potential housing development throughout the sub region. This work has in turn been informed by the city's Urban Capacity Study, as well as through the preparation of the AAPs, providing a truly 'joined up' approach.
- 3.11. On the demand side the extensive evidence base includes a Housing Needs Study as well as the Housing Market Assessment. The quantity of housing is also linked with the economic strategy, whereby the economic potential of the city and the sub-region has helped to determine the level of housing development required. Again, a range of alternative, but supporting approaches have been used in order to arrive at realistic estimates of demand, forming the foundations for an effective plan, monitor, manage approach.

### **Housing developments in suitable locations, which offer a good range of community facilities and with good access to jobs, key services and infrastructure.**

- 3.12. The concept behind the objective of creating sustainable linked communities is that all communities, whether they be new or existing, should have an

appropriate range of facilities and good access to local services and facilities, as well as linking to the city's other facilities.

- 3.13. The sustainable linked communities objective seeks to secure, amongst other things:
- Neighbourhoods that are able to support basic amenities and facilities
  - A mix of housing to support a range of household size and type
  - Fully accessible neighbourhoods served by good public transport
  - Safe, accessible and healthy local environments
  - A positive sense of place and identity
- 3.14. The locations of development identified in the Plymouth LDF have been informed by an Urban Capacity Study, a joint study area investigation of potential locations for growth, and the Sustainability Appraisal. The objective has been to identify a range of sites in sustainable locations whilst allowing for a mix of dwelling types from family housing to flats. This meets the need to provide housing for economic in-migrants as well as the need to secure urban renaissance within key parts of the city.
- 3.15. The proposals at North Plymstock are driven by the need to plan for development that responds to Plymouth's changing population characteristics and housing needs. The locations relate to the significant brownfield redevelopment opportunities at Plymstock Quarry, following the closure of the Blue Circle Cement Works. This opens up the opportunity to create a sustainable mixed use neighbourhood. In addition Sherford will also provide a large sustainable new settlement, albeit primarily located in South Hams. This will define the eastern extent of Plymouth by consolidating the boundary between Plympton and Plymstock.
- 3.16. New transport infrastructure is planned as part of the proposal to link the development with the City Centre and other key areas, providing sustainable access to jobs and key services. The AAP also provides for a new local centre containing local shops, commercial services and leisure facilities as well as new public facilities including a school, indoor and outdoor sports facilities, community facilities, employment opportunities and health services to meet local needs. There will also be space and facilities for younger children as well as older children and teenagers.

**A flexible and responsive supply of land – managed in a way that makes efficient and effective use of land, including re-use of previously developed land, where appropriate. (para 10)**

- 3.17. The Plymouth Core Strategy identifies broad locations and specific sites to 2021 and an indication of further long term opportunities in the period beyond 2021. This is in accordance with the level of housing provision set out in the emerging RSS. It also includes an objective to ensure that at least a five year supply of housing land is available for development. This will be demonstrated within the AMR which will show how the supply of deliverable sites will be rolled forward each year to always ensure a 5 year supply.
- 3.18. Plymouth's ambitious LDF programme, which includes a series of AAPs and a Key Site Allocations DPD, will demonstrate the further supply of specific

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developable sites for years 6-10 and where possible for years 11-15. Broad distributions of development are shown on the Core Strategy key diagram. Specific sites, when allocated, will be shown on the Proposals Map. The anticipated housing trajectory is included within the Core Strategy and will be monitored through the AMR.

- 3.19. Overall the Plymouth LDF aims for a target of 80% of new dwellings being on previously developed land. To assist in meeting this target the Council with other partners are preparing a Housing Delivery Action Plan with the express purpose of identifying obstacles to development and the actions needed to overcome them. Within the North Plymstock AAP, over 60% of the housing development proposed is on previously developed land.
- 3.20. The submitted Core Strategy does not contain a specific housing density policy but states that national guidelines will be followed. Appropriate densities will vary from site to site and will be guided by the Characterisation Studies undertaken for key areas of the city, as well as the Sustainable Neighbourhood Assessments. These identify the distinctive features that define the character of a local area. Within the Plymstock Quarry proposal, densities will vary between 60 to 70 per hectare at the core of the site to between 35 and 50 for the rest of the site. At Sherford, densities will range between 35 and 55 per hectare.
- 3.21. The Council agrees that the AAP could be improved by the inclusion of a housing trajectory showing the split between greenfield and previously developed land. This is justified in the Council's statement - PCC Test 7F: Housing location, timing and delivery and the trajectory is attached as an annex to this statement. The North Plymstock AAP is expected to deliver housing during the 5 year and 6-10 year periods. The Housing trajectory will demonstrate the expected annual build rate.

## 4. Suggested adjustments to the North Plymstock AAP

- 4.1. The following amendments to the AAP are suggested:
  - 1) Inclusion of a table showing the delivery timescales for each proposal.
  - 2) Inclusion of a housing trajectory showing the split between greenfield and previously developed land.
  - 3) Inclusion of tables showing the monitoring frameworks, for housing and employment, for each proposal.

Annex 1: Delivery Summary

Proposal Reference	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021
NP01 Plymstock Quarry	■	■	■	■	■	■	■	■	■	■					
NP02 Pomphlett Industrial Estate		■	■	■											
NP03 Wakehams Quarry									■	■	■	■	■		
NP04 Billacombe Green	■	■	■	■	■	■	■	■	■	■					
NP05 Sherford and sports hub	■	■	■	■	■	■	■								
NP06 future development at Elburton										■	■	■	■	■	■
NP07 HQPT route	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■
NP08 public transport service improvements	■	■	■	■	■	■	■	■	■	■					
NP09 highways and traffic improvements	■	■	■	■	■	■	■	■	■	■					
NP10 National Cycle Network															
NP11 countryside park	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■
NP12 Chelson Meadow	■	■	■	■	■	■	■	■	■	■					
NP15 Moorcroft Quarry					■	■	■	■	■	■	■	■	■	■	■

Key

■ Construction and completion

Annex 2 Monitoring Tables

Table 1 Monitoring of Housing Development

Indicator	Plan Target					
	Total	NP01	NP02	NP03	NP05	NP06
Building of new dwellings	2595	1625	50	300	320	300
Of which, affordable homes	673	487	15	90	96	
Of which, lifetime homes	445	325	10	60	64	
Of which, on previously developed land	1575	1225	50	300		

Table 2 Monitoring of Employment Development

Indicator	Plan Target					
	Total	NP01	NP02	NP03	NP05	NP15
Retail space sq m net	2000sqm+	2000sqm+				
B1 sq m net	22800sqm	3.5ha 21000sqm	1800sqm			
Hotel	2700sqm		2700sqm			

Table 3 Expected Housing Delivery<sup>1</sup>

Proposal Reference		2006/7	2007/8	2008/9	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	Total
NP01 Plymstock Quarry	Brownfield	0	0	50	110	115	100	100	250	250	250	0	0	0	0	0	1225
	Greenfield	0	0	0	0	100	100	100	100	0	0	0	0	0	0	0	400
NP02 Pomphlett Industrial Estate	Brownfield	0	0	25	25	0	0	0	0	0	0	0	0	0	0	0	50
NP03 Wakehams Quarry	Brownfield	0	0	0	0	0	0	0	0	0	0	100	100	100	0	0	300
NP05 Sherford and sports hub	Greenfield	0	0	0	0	100	110	110	0	0	0	0	0	0	0	0	320
NP06 potential development at Elburton	Potential Greenfield Allocation	0	0	0	0	0	0	0	0	0	0	0	100	100	100	0	300
<b>North Plymstock AAP Totals</b>	Identified Sites - Brownfield	0	0	75	135	115	100	100	250	250	250	100	100	100	0	0	1575
	Identified Sites - Greenfield	0	0	0	0	200	210	210	100	0	0	0	0	0	0	0	720
	Potential Greenfield Allocation	0	0	0	0	0	0	0	0	0	0	0	100	100	100	0	300
<b>NORTH PLYMSTOCK AAP HOUSING TOTALS</b>		0	0	75	135	315	310	310	350	250	250	100	200	200	100	0	2595

<sup>1</sup> Delivery of housing on Proposal NP06 would be subject to assessment of need and economic justification through a Plan, Monitor, Manage process

Figure 1 North Plymstock AAP Housing Trajectory

