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Mr Matthew Brown
Strategic Planning
Cornwall Council
Dolcoath Avenue
Camborne
Cornwall
TR14 8SX

Our ref: 16334
7 August 2017

Dear Matthew

REPRESENTATION ON PROPOSED CORNWALL SITE ALLOCATIONS DPD (SADPD ON BEHALF OF MR R COURAGE: LAND AT PENRYN

Laurence Associates is instructed by Mr R Courage, to submit representations in response to the Cornwall Site Allocations Development Plan Document (SADPD).

Our representations set out below deal with generally policy issues and also with land controlled by our client off Round Ring Gardens, Penryn. A pre-application was submitted for the site in November 2016 (reference PA16/03254/PREAPP) and discussions are ongoing with Penryn Neighbourhood Planning Group to promote the site for inclusion within the Neighbourhood Development Plan (NDP).

The extent of the land owned by Mr Courage is illustrated in the Site Location Plan at Appendix 1. It is located north of the recently completed development by Persimmon Homes and a recently approved development of 55 dwellings, reference PA16/05239. The recent permission given under PA16/05239 for a residential development highlights that the area is a sustainable one for new development and this also applies to the site owned by Mr Courage which lies immediately to the north. The pre-application letter of 2016 highlights that it is suitable for development, subject to resolution of a number of technical issues which are typical of greenfield sites, i.e. namely landscape impact, trees and ecology.

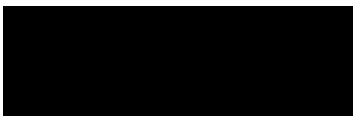
The site has not previously been submitted under the 'Call for Sites' Strategic Housing Land Availability Assessment (SHLAA) process as Mr Courage only took ownership of the site in mid-2015. However, since that time, he has liaised extensively with adjoining landowners (including Persimmon) to try and assemble a larger site and suitable access thereto. These negotiations have been successful and it is likely that access to the site can be achieved as/when required, and adjoining land owned by the Enys Estate may be considered for housing purposes if needed. However, Mr Courage would wish to promote his land in the first instance.

We consider that the SADPD, whilst making provision for a number of dwellings in Falmouth-Penryn, fails to provide sufficient flexibility for other sustainable sites on the edges of urban areas to come forward in the event that other preferred sites do not. There are significant delivery constraints on a number of provisionally allocated sites in the Falmouth-Penryn area and should these fail to yield any units within a reasonable timeframe, the supply for the area will become particularly constrained. We consider that the Council should indicate a date by which it expects sites to be commenced and/or delivered and should indicate potential areas for future growth. The area to the north of Penryn, including the site owned by Mr Courage, is suitable for a modest amount of housing growth and should be considered suitable for inclusion within the SADPD, either as an allocation or future direction of growth.

We hope that you are able to consider our request for inclusion of the site shown in Appendix 1, or part thereof, within the SADPD as a development prospect given its sustainable location and proximity to recent housing developments with which it will integrate well. From work undertaken to date, the technical issues of landscape, archaeology and ecology appear resolvable with typical mitigation measures in place and there are no other obvious constraints to development. The applicant will continue to work with the Penryn Neighbourhood Planning Group to achieve the same outcome in the NDP.

I look forward to receiving an acknowledgement of this letter.

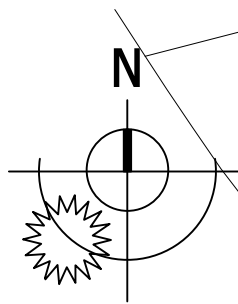
Yours sincerely



Hollie Nicholls MSc MRTPI
Planning Manager

Encs

Appendix 1



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LOCATION PLAN
1:1250

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Notes:

1:1250

Rev.	Description	Drawn	Date

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Project Title:
**CORNWALL SITE ALLOCATIONS
DEVELOPMENT PLAN DOCUMENT**

Project Address:
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Client:
MR R COURAGE

Drawing Title:
LOCATION PLAN

Scale:
1:1250 @ A3

Drawn:
CSR

Date:
04.08.17

Checked:

Drawing No:
16334.SADPD

Rev.

Preliminary



p l a n n i n g | a r c h i t e c t u r e | l a n d s c a p e

Mr Matthew Brown
Strategic Planning
Cornwall Council
Dolcoath Avenue
Camborne
Cornwall
TR14 8SX

Our ref: 14321-2
3 August 2017

Dear Matthew

REPRESENTATION ON PROPOSED CORNWALL SITE ALLOCATIONS DPD (SADPD): ON BEHALF OF CASTLE COURT LAND INVESTMENTS LTD

PA15/06128: Land North of Cuddra Aquatics, Holmbush Road, St Austell, Cornwall

Introduction

Laurence Associates is instructed by Castle Court Land Investments Ltd to submit representations in response to the Cornwall Site Allocations Development Plan Document (SADPD).

Our representations set out below deal with generally policy issues and also with land controlled by our client off Holmbush Road in St Austell. An application for outline planning permission was originally submitted in 2015 (reference number PA15/06128) and now proposes a combination of B2/B8 uses (all matters save for access reserved). The site location plan showing the extent of the site is outlined in Appendix 1.

The B2/B8 proposed application is driven by local demand for new commercial premises and the current lack of available space within St Austell and the proposed SADPD.

The current application proposes units with a total of 1,500 sqm of flexible internal B2/B8 space with associated access, parking and circulation space. Industrial premises which offer net internal

areas (NIAs) of this size could accommodate up to 50 full-time equivalent jobs which is considered to be a significant benefit for the town of St Austell.

Tests of Soundness

As the Plan Adoption process progresses the SADPD will be considered against the tests of soundness as set out at paragraph 182 of the National Planning Policy Framework (NPPF). We consider that the SADPD does not meet these relevant tests of soundness and is not positively prepared in terms of providing a sufficiently flexible and pragmatic framework within which genuine development opportunities for employment growth can be considered.

The reasons for this are set out below:

The Adopted Cornwell Local Plan (LP:SP) strongly advocates for employment growth; this support for sustainable employment growth is reflected in a number of policies supporting the development of workspace within the town of St Austell contained within the Local Plan.

The Local Plan (LP:SP) sets a requirement for new employment targets for St Austell which are expressed in Table St1 of the SADPD, copied below:

Table St1: St Austell's Employment targets (B use classes)		
	B1a Office (sqm)	Industrial (sqm)
Local Plan CNA Target	9,750	12,500
Net Completions Apr-10 to Mar-16	-1,025	4,566
Net extant planning permission / under construction (at Mar-16)	1,045	213
Residual Local Plan Target	9,730	7,721

The requirement for new B2/B8 use class workspace is for a total of 12,500 sqm of B use class floorspace (excluding B1) of which 7,721 sqm is yet to be committed. The SADPD refers to “a number of proposed schemes within St Austell’s hinterland for industrial space, including the Carludon Technology Park, as well as other employment sites located within the West Carclaze Ecocommunity” which are intended to deliver some of the targeted employment space. However, there is insufficient detail or evidence on what will be delivered, where, and how it will affect the overall targets. Without this information expressed clearly in the SADPD the residual target table above (Table st1) remains an aspirational target rather than a deliverable one.

In addition, the current draft SADPD includes and identifies only a single dedicated new employment site for B2/B8 purposes. The strategy map for St Austell town is provided at Appendix 2 for clarity.

The only site identified to deliver new industrial space (B2/B8 uses) is shown to the east of the town at Par Moor (STA-E3), which seeks to provide opportunities for industrial space “in the medium to long term i.e. 2023 onwards”. It is acknowledged that the site currently has temporary permission to be used as a depot for the consented Carlyon Bay beachfront development which prevents any development of the site for B2/B8 purposes until then.

The Councils strategy of choosing only one site to receive all employment growth is risky and unwise. The temporary use as a construction compound will significantly impede planning for and delivery of employment uses for another six years at the very least and it is anticipated given the nature of all largescale construction projects the timescales will likely overrun hindering the delivery of employment space until the end of the Plan period or not at all.

The delivery of the Par Moor site as an employment target is questionable; therefore, St Austell will need to rely on the smaller employment sites coming forward.

Importance of Smaller Employment Sites

In paragraph 9.25 of the SADPD the plan alludes to the importance that smaller employment sites will make to meeting the employment growth targets of the Plan. Given the importance of reinforcing the existing St Austell offer within the town centre we believe that these sites should be given more weight within the Plan and that those currently coming forward through the planning process should be identified and supported. Sites of around 0.5 hectare are fundamental to meeting the Council's employment requirements and will be readily deliverable within the short term to enable your larger strategic sites the time that will be required for these sites to deliver longer term employment growth in St Austell's without adversely impacting on employment land availability in the short term.

Provisional Allocations

The Plan sets out the Provisional allocation of STA-E1 has an existing employment site (Holmbush) which the SADPD seeks to protect given its strategically important role in the town in line with Policy 5 of the Cornwall LP:SP document. There is currently a severe lack of available B2/B8 space within the Holmbush site to allow business to expand or locate within St Austell.

The Site

The site owned by Castle Court (Appendix 1) is approximately 0.8 Hectares and adjoins STA-E1 on its western boundary. It is readily available and deliverable, it conforms with the policy aspirations set out within the SPDPD and the Local Plan and it could provide much needed employment space in the short term. Its delivery will support the Council's aspiration to deliver employment land in a sustainable manner, balanced over the life of the Plan.

As it currently stands the draft SADPD does not include the site as part of the allocation for new employment land. We consider that part of the solution to address the delayed delivery of B2/B8 space is to consider our client's site for employment purposes. Such an allocation will help to deliver a proportion of the targeted floorspace and provide choice in the market. The site would appear as a logical expansion of Holmbush Industrial Estate in terms of its location, sustainability and relationship with the urban form; enclosed by the A390 and A391. The site also benefits from being immediately available and will help to mitigate the significant delay in realising employment space delivery from STA-E3 (Par Moor). The delays from waiting until after the year 2023 to deliver employment space will constrain economic development in the town and undermines the strategic aim of the Cornwall Local Plan to deliver a mix of uses throughout the plan period.

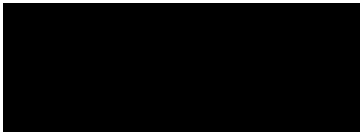
It is therefore asserted that the site should receive an allocation in the Site Allocations DPD for employment purposes. The site-specific matters concerning highways and flood constraints have been addressed through detailed reports submitted with the current planning application and indicate that development of the site is technically feasible and readily available.

Conclusion

In conclusion, we believe that the importance of smaller sites to meeting St Austell's employment growth targets should be given greater weight. We consider that our client's site adjacent to the strategically important Holmbush site is necessary to help meet the business space requirements of St Austell and there is clear evidence that the single opportunity identified by the Council (STA-E3) is constrained by the temporary construction compound use until 2023. To allow the development of the site through the current planning application and with an allocation in the SADPD will help St Austell to fulfil its economic potential and ensure that existing and new businesses have premises in which to grow and relocate.

I trust these comments will be taken into consideration and an acknowledgement provided in due course. We will continue to be involved throughout the adoption process in order to ensure the final SADPD is deliverable, sustainable and meets the required tests of soundness.

Yours sincerely



Hollie Nicholls MSc MRTPI
Planning Manager

Encs

Appendix 1

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 Contractors and Consultants must check all dimensions on site. Only figured
 dimensions are to be used. Any discrepancies to be reported to Laurence
 Associates before work proceeds. This drawing shall be used only for the
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Notes:

Rev.	Description	Drawn	Date
Not issued			

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Project Title:
 PROPOSED B2/B8 COMMERCIAL USE
 DEVELOPMENT

Project Address:
 LAND AT A391 & A390 JUNCTION
 ST AUSTELL

Client:
 CASTLE COURT LAND INVESTMENTS

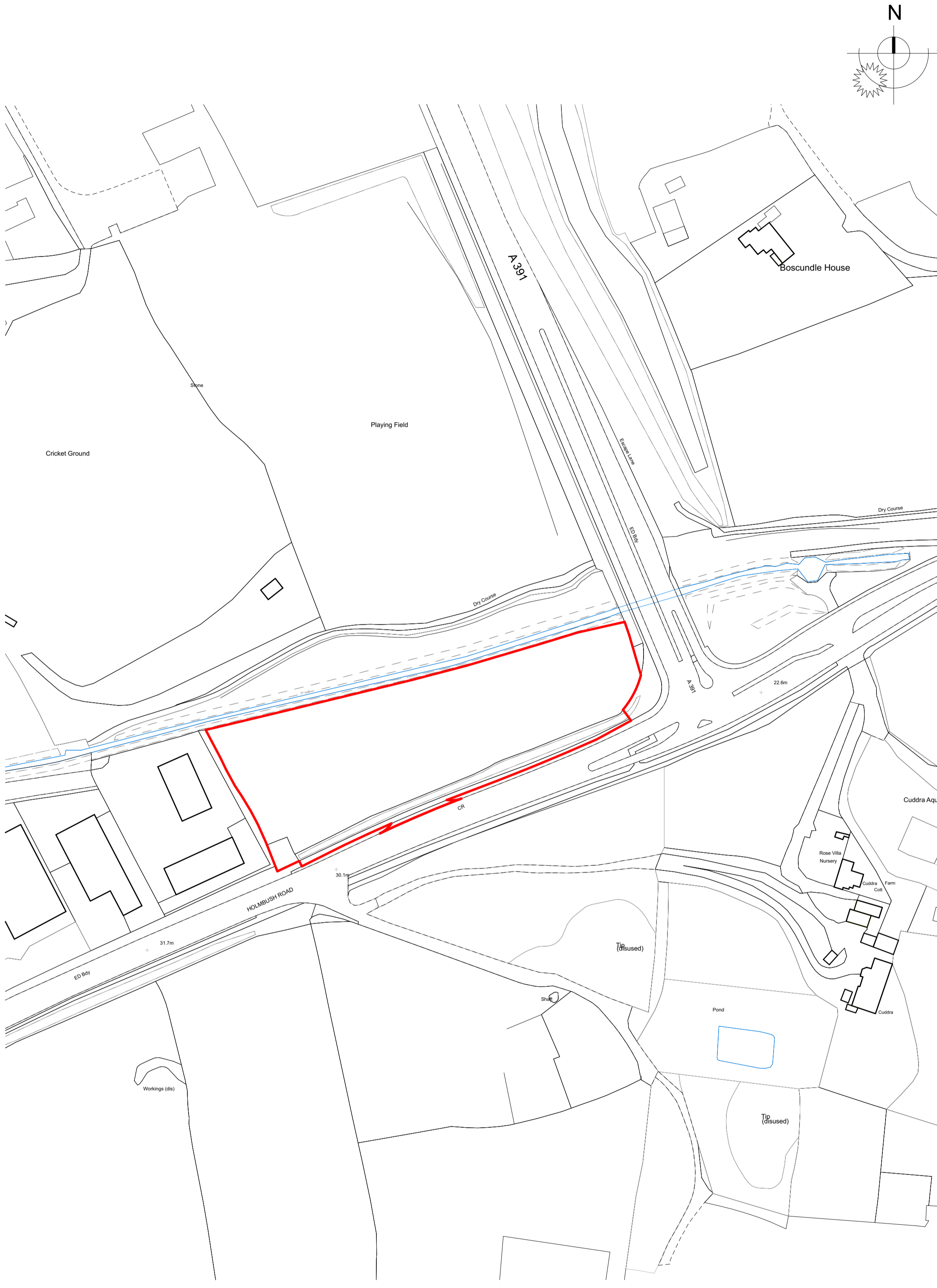
Drawing Title:
 LOCATION & BLOCK PLAN

Scale: SEE LAYOUTS@A1	Drawn: DW
Date: 03/17	Checked:

Drawing No:
14321.11

Rev:

Planning



LOCATION PLAN
1:1250



BLOCK PLAN
1:500