

To: Cornwall Allocations DPD, Strategic Planning

6TH August 2017

From: R & J A Bancroft, [REDACTED]

Reference: Your document 3-dpd-penzance-section-final

We have been advised that objections made at previous levels of consultation will not be included at this new level; our objections raised in November 2016 still apply so we are resubmitting them along with this new document, which includes additional concerns arising from our attendance at the meeting with Cornwall Council officials in Heamoor on 13th July 2017.

Could you please ensure that both documents are considered.

As before, our main objections relate to the allocations for housing in the Heamoor area, specifically PZ-H4 Trannack, PZ-H5 Polmennor Road and PZ-H6 Joseph's Lane; for traffic considerations, however, other allocation areas - PZ-H7, PZ-H8 and PZH9 are also important and are mentioned in the specific points below.

Our additional objections and issues are:

1. Increased risk of severity and frequency of flooding within Heamoor and the surrounding area.

. Severe flooding is already experienced here and also affecting roads, including Church Road, Rock Terrace and Treneere Lane down to and including the Parc Mellan area.

. The Cornwall Council officer and councillors (excluding our local councillor, Mario Fonk) present at this meeting appeared to be unaware of the recurring flooding in the village. They were also unsure of the location and extent of the flood plain in this area.

. We believe that the suitability of each of these sites for housing development should be re-checked ensuring that local knowledge of the flooding problems is taken into account.

2. The ability of the existing road infrastructure to support the increased traffic volumes and road safety /pollution due to the such a significant number of new houses

. All traffic from the allocations PZ-H5, PZ-H6 and PZ-H7 will be channelled through the main road in Heamoor; due to the proximity of the large secondary schools means that there is already much congestion at the start and end of the school day. There is also constant traffic flow throughout the day and delays by traffic having to cope with parked cars. The proposed developments can only increase this and add to the risk of accidents.

. All the village traffic mentioned above then together with that from allocations PZ-H8 and PZ-H9 converges at the Heamoor roundabout on the A30. This is already very busy at peak times and we do not believe it will be capable of supporting the estimated 38% increase in traffic volumes due to these developments.

. In addition to the above, ALL traffic from the Trannack allocation PZ-H4 will join the A30 at some point, maybe the Trenneere roundabout which due to the proximity of the Humphrey Davy school is already congested at peak times. The proposed pedestrian crossing points here will also slow traffic, resulting in more congestion to the adjacent Tesco and Heamoor roundabouts.

. The Council's view that the A30 can cope with all the additional traffic is based on the increased use of bus services (and bicycles which from a safety point of view is impracticable on such busy roads). Over the past few years the bus services through Heamoor have been reduced by 50% so there needs to be a very significant turn of direction and increased investment here to meet the planned 50% increase in usage.

. The local area provides very few job opportunities for such a significant number of new residents so even if the 'local' bus services could be provided on-going services to other centres of employment would need to be increased in both speed and volume or there will be no alternative to cars.

. Local employment here is totally dependent on tourism. The growth of tourism is critical to Cornwall's (and the UK's) economy but this doesn't seem to be reflected anywhere in the Council's policy.

. The A30 is the only major road in West Cornwall and from the Tesco roundabout to Lands End is at best a single carriageway A-class trunk road. Throwing all this extra traffic on to it will as the Council anticipates, slow down traffic allowing it to meet the design capacity. This will lengthen the transit times for all traffic traversing this section moving traffic congestion further out in both directions.

. So we've now filled up the A30 with local traffic, so what about the tourists? The Council does not appear to recognise this group at all; they don't appear to be included in any traffic surveys or plans, and certainly no increase in their numbers seems to be in strategic planning.

. To support increased tourism, with so many attractions in West Cornwall, it is not practicable to provide bus services to cover all tourist requirements, so they will need to rely on cars and expect to be able to do so, or they will go elsewhere.

. To meet the Governments targets for new housing, Cornwall Council should seek government funding to provide a new road (or roads) bypassing the current A30 between St Erth and Lands End to facilitate easier and speedier access to West Cornwall tourist attractions.

We hope that options of this type are under review and included somewhere else in the strategic plan.

Mr R and Mrs J A Bancroft



To: Cornwall Allocations DPD, Strategic Planning

November 2016

From: R & J A Bancroft, [REDACTED]

Reference: Your document 3-dpd-penzance-section-final

We hereby object to the proposed allocations for housing in the Heamoor area, specifically PZ-H4 Trannack, PZ-H5 Polmennor Road and PZ-H6 Joseph's Lane.

Our objections are:

1. Increased risk of severity and frequency of flooding within Heamoor and the surrounding area.

. Water run-offs from all these allocations feed into the Chyandour stream which meanders through Heamoor – private gardens, past St Thomas' church, along Treneere Lane and down to the sea at Chyandour. Severe flooding is already experienced here and also affecting roads, including Church Road, Rock Terrace and Treneere Lane.

. We believe these allocations can only increase the level and frequency of flooding.

. The risk is accepted in your document, but the suggested answer is to capture all the additional run-off, store it somewhere and release in a 'controlled manner' into the local water courses; which we suppose in these instances will be Chyandour stream.

. The water run-off from some 340 properties is a large volume, and particularly if as frequently happens we have continuous rainfall over several days. In addition, there will be run-off from the hard ground level areas of the allocations, which would be impossible to capture.

. In all the capture and controlled release looks fine on paper, but in practice is very expensive to implement, and difficult to operate and maintain.

. The other risk is any resulting extension to the flood plain area, bringing other existing properties into under threat.

2. Increased traffic volumes and congestion on the surrounding roads, and pollution due to the volume of cars from such a significant number of houses.

In all these allocations, the proximity of the large secondary schools means that there is already much congestion at the start and end of the school day; the proposed developments can only increase this and add to the risk of accidents.

The necessary additional access points and junctions will mean more disruption to smooth traffic flow, longer journey times and risk of accidents on roads not capable of supporting further extra traffic.

Allocation PZ-H4 Trannack

The proposal is that all vehicular access will be directly to and from the A30.

- . One assumes that this could be a single access to the existing Treneere roundabout or additional access points would have to be constructed; siting of the latter would appear to be a challenge. The increased traffic volume at the Treneere roundabout could create major problems with the Humphrey Davy school traffic, which currently backs up towards the roundabout.
- . The DPD document also requires pedestrian crossings of the A30 which one would assume would be subways or bridges rather than 'road level' crossings.
- . The document also suggests that these additional junctions and crossings on the A30 would be necessary to slow the flow of traffic to contain it within the design capacity of the road. We should not forget that as well as catering for local traffic the A30 is the main trunk road through Cornwall for most tourist travel.
- . With Cornwall's recognised dependence on the expansion of tourism, we should not be putting additional delays, interruptions of smooth traffic flow and frustration on our visitors.
- . If indeed we are saying that the A30 has reached its planned capacity, with the total number of new homes envisaged in the area, we should be seeking additional road infrastructure to support it.

Allocation PZ-H5 Polmennor Road

The proposal is that all vehicular access will be to and from Polmennor Road.

- . Polmennor Road is a narrow winding lane where at some points two cars passing can be a challenge.
- . Throughout the village there is continuous residential and business parking already and the siting of additional access points would be difficult.

Allocation PZ-H6 Joseph's Lane

- . We assume this will be from Joseph's Lane, although new access could perhaps be created from the Madron Road.
- . Joseph's Lane is already difficult with continuous on-street residents/business parking along the whole length of this allocation to the cross roads with Madron Road.
- . It is a very busy area already due to the proximity to Mounts Bay, already with severe congestion around school start and end times.

With over 1,000 new homes within just the Penzance and Gulval, plus the increase in tourism traffic necessary for the required growth in the Cornish economy, it is inconceivable that the A30 in its current form can continue to support the requirements of this document planned period.

Perhaps, a by-pass for the whole stretch through Penzance and Newlyn should be considered; this could remove much of the tourism traffic from the local roads and smooth traffic to the tourist many attractions West of here. A further linkage to the suggested by-pass for Crowlas, Cockwells, ... could provide additional improvements.

We hope that options of this type are under review and included somewhere else in the strategic plan.

Mr R and Mrs J A Bancroft



Cornwall Site Allocations Development Plan Document (Allocations DPD): Pre-Submission (Regulation 19) Consultation



Representation Form

Please return your completed form

by email: delivery@cornwall.gov.uk OR
by post: Cornwall Council, Local Plans Team, Pydar House, Pydar Street, Truro TR1 1XU OR
by hand: New County Hall reception (Truro) or any Cornwall Council One Stop Shop

before 5pm on Monday 7 August 2017

Fair Processing Notice

Your feedback, which will be retained for the life of the plan, will help Cornwall Council to finalise the Cornwall Site Allocations Development Plan Document (Allocations DPD).

The 2012 Town and Country Planning Regulations require all comments received to be submitted to the Secretary of State, so your information will be shared with the Department of Communities and Local Government and the Planning Inspectorate.

By submitting this survey you are giving Cornwall Council your consent to put your full name (excluding personal contact details and any signatures) and comments into the public domain; for publishing online on the Council's website and in hard copy. Information provided on the Equality Monitoring Form will not be published and will be retained for up to three months from the close of the consultation.

Part 1

1. Your contact details

You must complete this page for your representation to be accepted. The Council cannot accept anonymous representations.

Name:

Matthew Williams

Organisation (if applicable):

Williams Gallagher Town Planning Solutions Ltd

Address:

[Redacted]

Postcode:

[Redacted]

Email Address:

[Redacted]

Telephone number:



If an agent, the individual or organisation you are representing:

White River Developments Ltd (c/o Ellandi LLP)
(Owner of White River Place, St Austell)

2. Legal Compliance, Duty to co-operate and Soundness

This plan is published so that public comments can be considered alongside the plan when it's submitted and examined by an Independent Planning Inspector. The purpose of the examination, as stated in the Planning and Compulsory Purchase Act 2004 (as amended), is to consider if the plan complies with:

Legally compliant – does the plan:

- Appear in the Local Development Scheme timetable which sets out when Local Development Documents are produced by the Council as part of the Cornwall Local Plan?
- Agree with the Local Planning Authority's (LPA) Statement of Community Involvement?
- Comply with the Town and Country Planning Regulations 2012?
- Have a Sustainability Appraisal Report (if required)?

Sound - A plan is deemed sound if it satisfies key points:

- Positively prepared
- Justified
- Effective
- Consistent with national policy

Duty to co-operate - this is a legal test that requires co-operation between local planning authorities (LPA) and other public bodies to maximise the effectiveness of policies for strategic matters. It is separate from but related to test of soundness. The LPA will provide evidence of how they have complied with any requirements arising from the duty.

Do you consider the Allocations DPD is Legally Compliant?

Yes No Don't know

Do you consider the Allocations DPD is sound?

Yes No Don't know

Do you consider the Allocations DPD complies with the Duty to co-operate?

Yes

No

Don't know

Part 2

3. Your comments

Please select from the list below, which town your comments relate to. You can also comment on strategically important employment sites; these are sites which are located within more rural areas.

If you wish to comment on more than one area, please complete a separate survey for each.

- | | |
|---------------------------------------------------------------|-------------------------------------------------------------------|
| <input type="checkbox"/> Bodmin | <input type="checkbox"/> Launceston |
| <input type="checkbox"/> Camborne/Pool/Illogan/Redruth (CPIR) | <input type="checkbox"/> Newquay |
| <input type="checkbox"/> Eco-community | <input type="checkbox"/> Penzance and Newlyn |
| <input type="checkbox"/> Falmouth and Penryn | <input type="checkbox"/> Saltash |
| <input type="checkbox"/> Hayle | <input checked="" type="checkbox"/> St Austell |
| <input type="checkbox"/> Helston | <input type="checkbox"/> Strategically important employment sites |

Please give precise comments saying why you think the plan is or is not legally compliant or sound and explain how you would modify the plan to make it legally compliant or sound.

My comment relates to *(please select one)*:

Policy (site) (please provide the policy number you are referring to)	Our comments relate to Chapter 9 of the Site Allocations DPD Consultation Document (St Austell) and Site Allocation STA-R1 (Old Vicarage Place).
Strategy text (please state the section you are referring to e.g. employment, housing etc.)	
Evidence document (please note which document you are referring to)	

Your comment

Further to our previous representation in November 2016, we are pleased to note that the Council has lent its support to the continuing regeneration of St Austell through the allocation of Old Vicarage Place (STA-R1) for retail development. As part of this we support the policy requirements to:

- bring forward the retail development of this site comprising A1 – A5 uses with other uses permitted on upper storeys;
- create good pedestrian links to both Fore Street and White River Place;
- create a good quality façade onto Fore Street and conserve and where appropriate enhance the setting of the Conservation Area and nearby Listed Buildings; and
- consider creating larger footprint retail units that offer an alternative to smaller premises currently found within the Centre (and outside of White River Place).

A continued commitment to the Town Centre is considered critical, not least because there remains a real threat from out of centre development in this area of Cornwall.

We agree that the site offers the opportunity to further revitalise the Town Centre and as we have always maintained, we consider it to be the most sustainable and appropriate location to deliver a modern retail development in St Austell to meet the needs of the local community.

We also welcome the acknowledgement that St Austell is an important retail centre and that improving its retail offer remains a priority for the Council. Moreover, we continue to support the recognition that there is no further capacity for out of centre retail development beyond that to be provided by the Higher Trewhiddle Farm proposal.

How would you change the plan so it is legally compliant or sound?

N/A

4. Duty to co-operate

Although comments relating to the duty to co-operate can't be amended at examination, if you think the plan doesn't comply we'd still like to know why.

N/A

5. Examination in public and further notification

If your comment(s) request a change; do you wish to speak at the oral part of the examination

No I do not wish to speak at the public examination

Yes I do wish to speak at the public examination

Please note even if you've selected that you wish to speak at the examination, the Independent Planning Inspector will decide who, if anyone, should speak publically. Even if you select No, your written comments will still be considered by the Inspector and given the same weight as verbal comments at a hearing session.

Further notification

Please let us know if you would like to be notified on either or both of the following:

The Independent Planning Inspector's published recommendations of the emerging Allocations DPD under section 20 of the Planning and Compulsory Purchase Act 2004

Yes No

The adoption of the Allocations DPD

Yes No

If you have answered Yes to either of the questions above and your preferred contact details differ to those already given, please enter the details below.

Please use this postal address to notify me

See above

Please use this email address to notify me

See above



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Part 1

1. Your contact details

You must complete this page for your representation to be accepted. The Council cannot accept anonymous representations.

Name: William L Holman

Organisation (if applicable): The North & Middle Pill Landowner Consortium

Address: [Redacted]

Postcode [Redacted]

Email Address [Redacted]

Telephone number: [Redacted]

If you’re an agent, please state the individual or organisation you’re representing

[Click here to enter text.](#)

2. Legal Compliance, Duty to co-operate and Soundness

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Do you consider the Allocations DPD is Legally Compliant?

Yes No Don't know

Do you consider the Allocations DPD is sound?

Yes No Don't know

Do you consider the Allocations DPD complies with the Duty to co-operate?

Yes No Don't know

Part 2

3. Your comments

Please select from the list below, which town your comments relate to. You can also comment on strategically important employment sites; these are sites which are located within more rural areas.

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|---------------------------------------------------------------|-------------------------------------------------------------------|
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| <input type="checkbox"/> Camborne/Pool/Illogan/Redruth (CPIR) | <input type="checkbox"/> Newquay |
| <input type="checkbox"/> Eco-community | <input type="checkbox"/> Penzance and Newlyn |
| <input type="checkbox"/> Falmouth and Penryn | <input checked="" type="checkbox"/> Saltash |
| <input type="checkbox"/> Hayle | <input type="checkbox"/> St Austell |
| <input type="checkbox"/> Helston | <input type="checkbox"/> Strategically important employment sites |

Please give precise comments saying why you think the plan is or is not legally compliant or sound and explain how you would modify the plan to make it legally compliant or sound.

My comment relates to *(please select one)*:

Policy (site) (please provide the policy number you are referring to)	Saltash Chapter
Strategy text (please state the section you are referring to e.g. employment, housing etc.)	Para. 13.2 Saltash : Key Facts
Evidence document (please note which document you are referring to)	

Your comment

Para 13.2 Key Facts

Figures should be presented for 2010 (Baseline at start of Plan) and 2017 (Current progress against plan.)

There is also the need to include Key Facts relating to the five Specific Objectives for PP17Cornwall Gateway Network Area being appropriate baseline data for Regeneration ; Jobs and services , Affordable Housing ; Transport and Tourism.

Additional and more relevant figures need to be provided on Housing.

Saltash according to Cornwall Council's own analysis of Council Tax bandings has an unusual housing balance profile when compared with the Cornwall average. There are low numbers of both small 1 bed homes at the entry level to the housing market as well as a shortfall of top end homes. Details of this should be included in the DPD as well as an intent and measures to bring about a more appropriate balance.

How would you change the plan so it is legally compliant or sound?

Figures should be presented for 2010 (Baseline at start of plan) and 2017 (current progress against plan.)

1. Baseline figures are needed to measure and track the success of the Plan over time through to 2030
Include 2010 and 2017 figures including for :-
Regeneration – no. of shops/business; floor space; footfall etc
Job and Services – no. of f/t and p/t jobs; no. of self-employed businesses, no. of rural based businesses etc
Affordable Housing – no. of current units; current demand and annual % growth assumption.
Transport – annual no of trains stopping; no of weekly bus services; miles of cycle paths; miles of footpaths; no of electric recharge points; no of weekly water taxis etc.
Tourism – no. of bed-night stays; no. of visitors to attractions; no. of local attractions; no. of camp/caravan/chalet sites; no. of hotels and the like.
2. Include figures on **General Housing** provision – no. of dwellings; no of open market housing; no of affordable housing; building rates and the like.
3. Include details and diagrams to illustrate the present unusual balance of housing by Council Tax banding to promote the need and support for 1 Bed/studio accommodation and top end housing with text to encourage developments which encourage the provision of same to bring about a better balance.

My comment relates to *(please select one)*:

Policy (site) (please provide the policy number you are referring to)	Saltash Chapter
Strategy text (please state the section you are referring to e.g. employment, housing etc.)	Para 13.4 Saltash : Strategic Targets and Objectives
Evidence document (please note which document you are referring to)	

Your comment

<p>Paras 13.4 and 13.5 Strategic Objectives and Targets – There is the need to insert the five Strategic Targets stated in the Community Network Areas Document for Saltash being Regeneration, Jobs and Services, Affordable Housing, Transport, and Tourism</p>

How would you change the plan so it is legally compliant or sound?

<p>1. Include target figures necessary to meet plan obligations in 2030. Only housing and retail aspects are included at present. Also the Housing figure stated is the minimum target and needs to be referred to as such. It would also be beneficial to include the predicted housing trajectory figure needed to hit such housing figure in Saltash. This will enable progress against plan to be more transparent and monitored to allow corrective measures to be taken as necessary.</p> <p>Regeneration – no. of shops/business; floorspace; footfall etc Job and Services – total no. of businesses; no. of f/t and p/t jobs; no. of self-employed businesses, no. of rural based businesses; no of business hubs; no. of live-work units; Area (in hectares) of available serviced land; Affordable Housing – no. of current units; no. of new units provided; annual revised demand figure; annual predicted % demand growth need; no. of self-build/self-custom units constructed. Transport – annual no. of trains stopping; no of weekly bus services; miles of cycle paths; miles of footpaths; no. of electric recharge points; no. of water taxis etc. Tourism – no. of bed-spaces; no. of bed-night stays; no. of visitors; no. of local visitor attractions; no. of camp/caravan/chalet sites; no. of hotels etc.</p> <p>2. Also need to include figures on General housing provision – no. of dwellings (both open market and affordable); range/balance of housing by value and/or size/beds; current and predicted building rates etc</p>

My comment relates to *(please select one)*:

Policy (site) (please provide the policy number you are referring to)	Saltash Chapter
Strategy text (please state the section you are referring to e.g. employment, housing etc.)	Para 13.7 Overarching Strategy and Concepts
Evidence document (please note which document you are referring to)	

Your comment

The document states Saltash's" proximity to Plymouth can be used to its advantage." This is a bland statement, does not go into adequate detail and hence demands the question How ?

What are the predicted effects and impact on Saltash ? Will they be negative or positive and what will be the consequences for the Saltash DPD?

The Plymouth & South West Devon Joint Local Plan 2014 -2034 is not even mentioned.

Remember Plymouth is only 300m from Saltash, and has a massive socio-economic impact upon it, being the 16th largest City in the UK. It is too big a topic to say it is a Neighbourhood Plan issue. The sphere of influence and gravitational pull of Plymouth has a profound effect on SE Cornwall and beyond!

Plymouth's long term vision is to be *one of Europe's most vibrant waterfront cities where an outstanding quality of life is enjoyed by everyone.*

What should Saltash seek to derive. Indeed what should the Cornwall Gateway Community Network Area seek to derive? The River Tamar is an administrative boundary not an economic one! The DPD needs to reflect this fully and absolutely.

At present it does not !

Consequently, there is a need to test and reassess the integrity of the whole Saltash DPD in terms of its Economic Growth plan and assumptions and more specifically the future vision for Saltash including job and housing numbers to ensure that the numbers cited are safe, relevant and robust.

How would you change the plan so it is legally compliant or sound?

1. Include much more detailed analysis and policy assessment required for the Saltash DPD taking account of The Plymouth & South West Devon Joint Local Plan 2014-34 including but not solely limited to :-
SPT 2 – Sustainable linked neighbourhoods and sustainable rural communities;
SO3 – Delivering Growth in Plymouth City Centre and Waterfront Growth Area;
SPT 7 – Working with neighbouring areas (specific mention of SE Cornwall and an intent to “maximise the benefits brought by the economic growth of Plymouth.”);
PLY3 – Utilising Plymouth’s regional economic assets (stating specifically that The City will work“to strengthen its higher value industries, including it’s marine, advanced manufacturing, medical and health care and knowledge- based economic sectors, optimising the benefits that these assets bring to the city and regional economy including support for satellite facilities in the Thriving Towns and Villages Policy Area.”
2. Re-examine the Economic Growth assumptions on jobs and housing for Saltash and ensure that these are safe and robust.
3. Re-write the Saltash DPD to take account of 1 and 2 above and also the future Vision for the Parish to ensure alignment with the Saltash Neighbourhood Plan.

My comment relates to *(please select one)*:

Policy (site) (please provide the policy number you are referring to)	Saltash Chapter
Strategy text (please state the section you are referring to e.g. employment, housing etc.)	Paras 13.11 to 13.15 incl. Economic Development
Evidence document (please note which document you are referring to)	

Your comment *(the box will expand as you type)*

More commentary required on the impact and potential of the Plymouth & South West Devon Joint Local Plan to 2034.

A very narrow strategy is articulated in the Saltash DPD.

Jobs are not merely about developing a new Business Park or providing major serviced sites, it is also about creating a climate and environment in terms of infrastructure, premises etc. for SME business and businesses to establish, develop and grow thus generating jobs. This point is missed within the Saltash DPD and potentially is a key aspect in terms of contributing to the future needs and development of the Plymouth and SW Devon economy as an attractive and alternative location. This is why so many people live in SE Cornwall but commute to work in Plymouth.

How would you change the plan so it is legally compliant or sound?

1. See comments relating to the Plymouth & South West Devon Joint Local Plan to 2034 under Para. 13.7. above. The true impact and potential of the regionally significant Plymouth(and SW Devon) economy needs assessment.
2. **Include statements and data on the importance of the small business and self-employed sectors to the local and Cornish economy.**
3. Reference Local Plan policies to encourage and support these sectors especially low cost easy-in easy-out start-up premises, business hubs, and live/work studio accommodation in both urban and rural areas. This will allow more people to work and live in Saltash resulting in improved sustainability.
4. Mention of developing the Renewable Energy sector in the town for generation sites and job creation.
5. Not everyone will require business accommodation on the Business Estates/Parks including the new Stokedon Cross Estate. Greater diversity and choice in provision is required and should be acknowledged.
6. The DPD needs to ensure a broad and balance supply of business start-up facilities, recognition of growing work-from home enterprises and the need to encourage suitable live-work units in the town and rural areas.

Policy (site) (please provide the policy number you are referring to)	Saltash Chapter
Strategy text (please state the section you are referring to e.g. employment, housing etc.)	Paras 13.20 to 13.24 Housing Growth
Evidence document (please note which document you are referring to)	

Your comment

Housing Growth : Quantum and Site Allocation

The Saltash DPD is considered to be flawed in relation to Housing Growth Policy and Planning for four fundamental reasons.

Reason 1 is the lack of adequate consideration of the Economic Growth implications arising from the Plymouth and South West Devon Joint Local Plan 2014 to 2034 as referred to under comments made to Paras 13.7 and Paras 13.11 to 13.15 above.

Reason 2 is the considerable risk in relying upon the Broadmoor Farm Urban Extension as a single strategic site to meet Saltash minimum housing target obligations through to 2030;

Reason 3 is that no robust planning methodology has been applied to predict the target and hence planning level for the provision of Affordable Housing to meet local need through to 2030 resulting in an absence of strategy within the DPD to ensure the delivery of forecast numbers. Indeed, there is no mention of Affordable Housing at all within the Saltash DPD; and

Reason 4 is that the combined total effect of the three deficiencies call into question the integrity of the Sustainability conclusions for the Saltash DPD.

The commentary and reasoning relating to the Plymouth and South West Joint Local Plan 2014-2034 made under Paras. 13.7 and 13.11 -13.15 above (i.e. Reason 1) should be considered in conjunction with the deficiencies raised by the three additional Reasons which are now considered in turn.

Reason 2 : The risk to achieving the desired quality of development and overall positive benefits for Saltash associated with a reliance on one strategic site (Broadmoor farm) as an urban extension to meet Saltash DPD targets.

The robustness or otherwise of the house building trajectory for Saltash as part of the Cornwall Gateway Community Network Area is a material factor here.

The heavy reliance on the strategic Broadmoor Farm development to meet Saltash housing target obligations is a growing risk for the Parish. The planning application has been with Cornwall Council for some three years and variations to the application are, it is understood, being discussed with officers of the council.

It is further understood at the time of writing, that those variations are "in camera" and moreover a draft Sec.106 has not been brought back to the Town Council for

consultation. Consequently, the Section 106 Agreement for the scheme has yet, it is understood to be completed.

Lack of alternative site allocations will encourage brinkmanship in finalising a Sec. 106 Agreement on this strategic site. Indeed, it would be surprising if this were not a tactic being employed by the promoter of the development in such a situation.

Cornwall Council's time imperative to ensure development to hit targets by 2030 will establish an environment to encourage the squeeze and erosion of terms as the scheme promoter plays hard-ball to gain greater commercial advantage. This is a risk for Saltash.

In simple terms the longer the negotiation continues the weaker the hand of the Council. This will disadvantage Saltash by leading to a detrimental effect on the breadth or quality of development and community benefits negotiated. This would of course include matters such as the quantum of affordable housing provision, the scale and quality of community facility provision, the design quality of houses as well as the timing of key obligations. The recent example of South Hams District Council accepting a dilution of Design Standards on the Sherford new settlement development on the eastern boundary to Plymouth is a warning here. This is a real risk for Saltash.

Given the prime reason for the site allocation was the intention to plan for balanced growth at Saltash where employment is linked with housing growth for the Cornwall Gateway area, it is believed that any changes should be consulted on with the Town Council at this important time in the timescale of the Neighbourhood Plan preparation. To do otherwise is a risk for Saltash.

Moreover, the application is by a promoter and is not developer led. Hence there is still the need for applications for reserved matters to be made and approved. This will take further time, eat further into the life of the Plan and again put pressure on the Council to agree reductions in development standards under the Sec. 106 agreement. This is a further real risk for Saltash.

The Cornwall Housing Trajectory as originally envisaged is now behind schedule and given that the Cornwall Council assumed that there would be a four year lead in time between outline consent and start on site this means the scheme will not deliver homes until ten years in to the plan period with no meaningful development being achieved to meet latent demand in the area for homes – both affordable and open market. The development programme and plan is unclear. This is considered to be an unsafe position and a further risk for Saltash.

Further Site Allocations for strategic and/or non-strategic schemes elsewhere within Saltash would be a prudent contingency measure.

Reason 3 : There is an inadequate assessment for predicted Affordable Housing demand to meet local needs through to 2030, and an absence of a robust and meaningful planning strategy to deliver same within the Saltash DPD.

It is evident that there is a disconnect here between the Cornwall Local Plan Affordable Housing Need Trajectory – Methodology April 2016 which plans need through to 2030 and the DPD methodology that does not.

In addition to the affordable housing policy information embodied within the Cornwall Local Plan, the following information sources are of relevance.

1. The Cornwall Local Plan : Strategic Policies Hypothetical Allocation of the Twenty Year Housing Target for The Cornwall Gateway Community Network Area;
2. Qualifying criteria as per www.cornwall.gov.uk/housing/housing-options/homechoice-housing-register/ and
3. The Schedule of Council Minimum Bedroom Need (Homechoice Register) for the parish.

The Cornwall Council affordable Housing Team have stated that they *"do not project growth assumptions for affordable housing but instead use current identified need data.... "*

This is imprudent at best. At worst it neglects the true needs of Saltash into the future.

There is potentially a very significant shortfall in the supply of affordable housing through to 2030 for Saltash.

Cornwall Council advise that demand from Bands A to E should be considered.

Using Cornwall Council's 30% policy target for affordable housing provision on approved residential developments against a 2016 affordable housing demand figure of 664 and excluding any growth assumptions through to 2030 requires a housing allocation of 1992. This is against a Local Plan provision of 1200.

Omitting Band E need, reduces demand by 371 to 293 suggesting a housing allocation of 879, a figure within the Local Plan provision of 1200. However these figures do not allow for any growth in demand between now and 2030.

"What annual growth rate should be assumed for planning purposes based upon the 2016 figures ?"

- 1% p.a. growth increases present numbers by 15% over the next 14 years to 2030
- 2% p.a. growth increases present numbers by 32% over the next 14 years to 2030.
- 5% p.a. growth increases present numbers by 98% over the next 14 years to 2030.

This demonstrates a very worrying and real under provision of housing for Saltash under the DPD. This needs to be re-examined and more robust planning assumptions applied to determine an appropriate overall housing target for the

Saltash DPD.

If not re-examined, what are the Site Allocations Saltash DPD policy intentions for affordable housing? Are they :-

1. Do nothing and consciously underprovide.
2. Only plan to meet the demand from Bands A-D.
3. Encourage the development affordable housing with the private sector, especially for studio (bed-sit) accommodation to meet Band E demand, but how ?
4. Work with an existing or establish a local Community Land/Property Trust (CPT) to increase affordable housing supply above that provided by private and public/social developers, but how to secure land ?
5. Seek to increase the percentage of housing presently provided within the Cornwall Local Plan to enable proportionately more affordable housing.
6. Encourage the regeneration and intensification of existing social housing sites in the Parish.
7. Permit 3/4/5 storey developments to limit land-take requirements.
8. Look for cross-subsidisation opportunities to enable regeneration of existing social housing sites by the inclusion of contiguous or non-contiguous land.
9. Increase land allocations/identify exemption sites/ secure land for CPT for development with higher affordable housing allocation.
10. Extend solutions beyond 2030.
11. Hypothecate monies secured from the disposal of "council housing" by Cornwall Council in Saltash to assist in funding replacement affordable accommodation.

More importantly, what is the Plan under the Saltash (Site Allocations) DPD for Affordable Housing provision through to 2030 and how will the perceived disconnect between the Local Plan, Site Allocations DPD and Saltash Neighbourhood Plan be addressed?

As concluded under Reason 2, further Site Allocations for strategic and/or non-strategic schemes elsewhere within Saltash would be a prudent contingency measure to help meet affordable housing requirements to 2030.

Reason 4 : Sustainability is of course at the heart of both the Cornwall Local Plan and emerging Saltash Neighbourhood Plan.

Further site allocations at Saltash would contribute sufficient capacity to deliver the Sustainability objectives sought.

These factors alone, and the uncertainties and hence risks surrounding the ability of the single site to deliver growth will have consequences for Saltash and hence it is suggested that the identification and allocation of additional sites for residential and mixed developments within the Parish is now not only prudent but essential under

the Saltash DPD.

Significantly, additional Potential Development Options for Saltash were identified by Cornwall Council in their Core Strategy Consultation Document published in January 2012.

This included under the Saltash Town Framework Potential Development Options A4 and A5 in North and Middle Pill. Indicative development figures provided by the Council indicated for site A4, 108 to 144 houses, and for site A5, 90 to 120 houses.

The sites are especially well and closely located to the existing town centre, waterfront, public transport links as well as being located adjacent to two exceptional sport and recreational facilities and a planned cycle-network hub for the Town.

The sites are also outside the very wide-spread AONB designation which covers the majority of the Parish. The special proximity of these sites offers, without question, the greatest opportunity of any potential development site in Saltash to contribute to Strategic Objectives for the Regeneration of the Town Centre and Waterfront.

Public consultation and a series of detailed Pre-Application submissions have already been made to Cornwall Council for Tamar Village Saltash – a concept plan for a mixed development of between 150 and 200 dwellings.

Full details are available at www.tamarvillagesaltash.co.uk

Highway and Traffic assessments have been completed and discussions held with Cornwall Council. Six highway improvement schemes options at the New Road, Glanvill Terrace and Old Ferry Road Junction have been prepared to improve traffic flow and the segregation of vehicles, cycles and pedestrians. Land and Environmental Surveys have also been undertaken.

The Saltash Neighbourhood Plan Steering Group were briefed on the proposal and the present position in July 2017. This included notifying them of separate offers being on the table from different developers for different parts of the land owned by the Consortium ranging in size from 6.1ha (15 acres) to the entire 28.5 hectares (70 acres.) An invitation to prepare the best and most appropriate scheme for Saltash has been offered but at the time of writing no response has been received.

The total area or parts of the North and Middle Pill area can be brought “on-line” with a modest lead-in time. **Because of the nature of the site, mixed development schemes spanning some 50 to 250 homes can be provided.**

Further Site Allocations of this nature will reduce the development risks for Saltash and bring about greater market choice and diversity They will also meet the needs of the town, encouraging new business development and capitalising on the vision, presence and ambitions of Plymouth.

Together, these four Reasons with their associated arguments make a compelling case for a fundamental re-assessment of the overall Economic Growth, Housing Assessment and Sustainability assumptions for Saltash and justify the imperative to make further Site Allocations under the Saltash DPD.

How would you change the plan so it is legally compliant or sound?

To ensure the overall integrity and robustness of the Saltash DPD :-

1. Reassess the impact of the Plymouth and South West Devon Joint Local Plan 2014 to 2034 to test the validity of planned employment and housing number assumptions/targets for Saltash through to 2030.
2. Reassess the risks of relying upon a single strategic site to deliver all of the economic growth and housing requirements through to 2030 for both Saltash and the Cornwall Gateway Community Network Area.
3. Determine an overall planning level for the provision of Affordable Housing units within Bands A to Band E inclusive for Saltash through to 2030 and re-calculate the housing provision required to deliver same. The recalculation should assume the 30% affordable housing quantum for the area and, for the sake of prudence, allow an additional 10% contingency for slippage arising from "scheme viability" reductions under subsequent development Sec 106 Agreements.
4. Check the overall Sustainability integrity for Saltash; and
5. Make appropriate and additional Strategic Site Allocations for Saltash under the DPD or alternatively require such matter to be addressed under the Saltash Neighbourhood Plan through the identification of additional non-strategic sites (up to 50 units).

Policy (site) (please provide the policy number you are referring to)	Saltash Chapter
Strategy text (please state the section you are referring to e.g. employment, housing etc.)	Para 13.37 Transport Strategy
Evidence document (please note which document you are referring to)	

Your comment

The Saltash Green Infrastructure Strategy Map denotes the China Fleet Country Club as an Activity Focus Point. The Club is located in the NE corner of Figure Slt3. The Club is the largest employer and generates considerable amounts of staff, customer and supplier traffic. **There is also considerable pedestrian and cycle use yet there is an absence of an important section of footpath/ cyclepath link from the bottom of Salt Mill to the staggered junction with Pill Lane some 200m distant up the hill to the north.**

Land on the eastern side of the road provides capacity for a footpath and is Highway Maintainable at Public Expense. **This area should be defined/delineated on the Saltash Town Framework : Transport Strategy 2030 Map and Saltash Green Infrastructure Strategy Map as an "Existing/potential future walking/cycling route."**

How would you change the plan so it is legally compliant or sound?

1. Both the Saltash Town Framework : Transport Strategy 2030 Map and Saltash Green Infrastructure Strategy Map should be amended to delineate the route from Salt Mill through to the China Fleet Country Club "Activity Focus Point" as an "Existing/potential future walking/cycling route."

4. Duty to co-operate

Although comments relating to the duty to co-operate can't be amended at examination, if you think the plan doesn't comply we'd still like to know why.

Negligible Evidence of any Effects, Impact or Sustainability Assessment of the Plymouth and South West Devon Joint Local Plan 2014-2034 on Saltash or the Cornwall Gateway Community Network Area.

5. Examination in public and further notification

If your comment(s) request a change; do you wish to speak at the oral part of the examination

No I do not wish to speak at the public examination

Yes I do wish to speak at the public examination

Please note even if you've selected that you wish to speak at the examination, the Independent Planning Inspector will decide who, if anyone, should speak publically. Even if you select No, your written comments will still be considered by the Inspector and given the same weight as verbal comments at a hearing session.

Further notification

Please let us know if you would like to be notified on either or both of the following:

The Independent Planning Inspector's published recommendations of the emerging Allocations DPD under section 20 of the Planning and Compulsory Purchase Act 2004

Yes No

The adoption of the Allocations DPD

Yes No

If you have answered Yes to either of the questions above and your preferred contact details differ to those already given, please enter the details below.

Please use this postal address to notify me

Please use this email address to notify me