

**CORNWALL SITE ALLOCATIONS
DEVELOPMENT PLAN DOCUMENT
EXAMINATION**

**INITIAL QUESTIONS TO CORNWALL COUNCIL
FROM THE APPOINTED INSPECTORS**

Introduction

1. This note follows Preliminary Note INSP.S1 and the Council's response CC.S1 which dealt with matters of administration and general approach. (Q1-8).
2. The following Initial Questions to the Council are aimed at assisting our understanding of the Plan and its evidence base. The answers may lie within parts of the evidence base that we have yet to peruse in detail. In that case, the Council need only provide us with appropriate references. Otherwise the Council has the opportunity to expand on certain matters for clarity where appropriate.
3. On receipt of the Council's response we aim to issue in early December, via the Programme Officer (PO), a formal invitation to Hearing participants together with a Guidance Note and Schedule of Matters and Issues for consideration.

Q9 - Definition and Meaning of the Designation 'Direction of Growth'

4. In several of the towns subject to the SADPD, sites are allocated with the designation 'Direction of Growth'. How and where is this designation defined and does it count as an allocation in terms of current housing or employment other development land supply to meet the overall requirements of the adopted LPSP?

Q10 - Delivery of Highway and other Infrastructure

5. The delivery of most of the town strategies is more or less dependent on the implementation of a sometimes extensive schedule of highway improvements. Highways England made Submission representations that it would provide up to date information at a later date within the Examination regarding the funding and delivery of these works. The timely delivery of necessary highway improvements, and indeed other additions to infrastructure, might be crucial to the effectiveness of the Plan in bringing forward the respective town strategies and ultimately to its soundness. Is the Council able, with the HA and other providers as appropriate, to put forward current funding and delivery information related to the timescale of infrastructure delivery in advance of any Hearings, the better to inform discussion on these matters?

Q11 - Rate of Delivery of Strategic Sites

6. Leaving aside matters of site selection, which may also be for discussion, the rate at which strategic sites are likely to be delivered in several towns may be critical to the effective delivery of the town strategy and the soundness of the Plan. Even accepting that the SADPD is only part of the development plan and that other DPDs and NPs are expected to contribute to the Local Plan land supply, the delivery rate of the town-based site allocations is related to the Local Plan requirement and overall and five year housing land supplies. We recognise that the Council has provided an extensive evidence base in support of the housing and other development land supply. However, is the Council able to reference within the evidence base, or to provide additional information, as to individual site delivery trajectories to inform the foregoing considerations?

Q12 - Distribution of Development Compared with to LPSP Strategy

7. There is some variation between the levels of development for which the SADPD provides in different towns relative to LPSP targets. For example, SADPD allocations would result in the LPSP housing target for Newquay being substantially exceeded. In other areas the intended delivery would be more modest compared to the LPSP target, such as CPIR. There is also some variation in the level of housing, employment and retail consents and delivery set out in the SADPD compared to the LPSP and supporting studies. This may result from the production of these documents at different points in time. In order for the Examination to proceed on the best available evidence, the Council is asked to provide an update on the current situation in respect of housing, employment and retail completions and permissions since the start of the LPSP plan period by town, along with anticipated future delivery, as well as the delivery rates intended for the SADPD allocations sought in Q11. The Council is also asked to indicate where the justification for different levels of intended provision in SADPD towns relative to LPSP targets is set out.

Q13 – Housing Numbers and Floorspace Targets in Site Allocations

8. It appears that specific housing numbers or floorspace expectations for certain sites described in the evidence base for towns are not reflected within the text of SADPD allocations. This is, for example, the case in respect of allocations PZ-M1, PZ-M2 and PZ-M3, where indicative housing numbers are set out in the Housing Evidence Report but not in the SADPD. The Council is asked to clarify the situation in this respect?

Q14 – Residential density

9. Housing Evidence Reports indicate that housing allocations have typically been calculated on the basis of 35 dwellings per hectare with 60% of the land area used for housing, net of infrastructure. For clarity, the Council is asked to provide references to residential site capacity calculations.

Q15 - Relationship to Community Infrastructure Levy (CIL) and Size of Site Allocations

10. The proposed CIL rate is zero for housing allocations in the SADPD unlike elsewhere (section 2 of the Draft Charging Schedule). There is significant variance in the scale of sites proposed for allocation, ranging from in excess of 1,000 dwellings (allocations NQ-H2, SLT-UE1, and H-UE1) to as few as 13 dwellings (PZ-H11). Whilst the CIL Schedule is being examined separately, the Council is asked to explain, as background information, the reason and basis for exempting strategic housing sites from CIL, with reference the considerations of scale or other criteria used to determine what represents a strategic site in the SADPD.

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24 November 2017

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Inspector