

**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?

Firstly, the four Future Directions of Growth (Barview Future Direction of Growth: H-D1; Treliever Future Direction of Growth: FP-M4; Hurdon Road Future Direction of Growth: LAU-H2; Landlake Road Future Direction of Growth: LAU-E1) are not needed to meet the overall requirements of the adopted LPSP. They have been identified to highlight the long term strategy for the town(s), either in terms of clarifying provision of strategic infrastructure, and/or providing some certainty around place making and masterplan considerations for current (plan period) allocations as follows:

- Hayle – it ensured that all land between the existing built area to the north and the A30 to the south is identified in some form; which in turn will help to ensure that any masterplanning for the Trevassack allocation is future proofed
- Falmouth & Penryn – it is identifying the likely area for further growth beyond the plan period (i.e. the expectation that further development should be to the east of the Treliever allocation, rather than the north), which again helps to future proof any masterplanning exercises for the Treliever (FP-M3) site)

- Launceston – The two Future Directions of Growth were included as Cornwall Council wanted to highlight the long term (beyond the plan period) intention to deliver a highway route through the southern expansion area, as it will affect the alignment and design of the route / junctions through the adjacent allocations. As a result, an expression of the likely capacity etc of the Future Directions of Growth was felt necessary to future proof early delivery of elements of the road. Plus LAU-E1 was also identified as it represents one of the few remaining areas of relatively flat ground, which would be suitable for larger footprint employment buildings, within relatively close proximity to the A30.

The references to the nature/definition of the sites, in that they are not required within this Plan period, are set out as follows:

- Barview (H-D1): The policy wording H-D1(a) sets out the timescale for delivery
- Treliever FDG (FP-M4): The policy wording FP-M4(b) sets out when the site could come forward; plus paragraph 7.48 of the SADPD sets out the nature of the site
- Hurdon (LAU-H2): The policy wording LAU-H2(a) sets out when the site could come forward; plus paragraph 12.36 of the SADPD sets out the nature and intention regarding the site
- Landlake Road (LAU-E1): The policy wording LAU-E1(a) sets out when the site could come forward; plus paragraph 12.23 of the SADPD sets out the nature and intention regarding the site

The Council would be happy to include a single definition for the Future Directions of Growth, to be included within the introductory sections of the SADPD, if it is felt that this would aid clarity on the matter.

## **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?

Responses in relation to the three most significant elements of infrastructure are set out below:

Transportation – **Appendix 1** sets out the projects still to be delivered within the various town based transportation strategies, together with cost, timescales, etc (the spreadsheet also contains various countywide projects

that are referenced within the strategies for each town). Funding will be from a variety of sources including s106 contributions; Cornwall Council investment; and grant funding. Currently there is approx. £16m secured through s106 agreements for transport projects within the SADPD towns. Cornwall Council also has an excellent record of securing grant funding for highway projects.

**Appendix 2** also sets out a Statement of Common Ground between the Council and Highways England, which helps to clarify their position subsequent to their submission representation, and addresses some of the points highlighted in the question above.

Education – The expansion of existing schools or development of new schools, will be delivered through a number of different mechanisms, including: securing funding through s106 agreements; bids to central government, whether through its free school programmes, Growth Deal etc; plus the Council is putting in place its own Investment Programme, which includes funding infrastructure, including schools, that will help to unlock planned growth. **Appendix 3** sets out a table with the schemes set out within the Education sections of the SADPD, together with estimated costs and associated commentary.

*(Currently there is approx. £17m secured through s106 agreements for education projects within the SADPD towns)*

Green Infrastructure – On-site delivery of open space will be delivered via s106 agreements in relation to the site in question. Off-site improvements to existing open spaces, together with wider biodiversity enhancements will be dealt with through contributions secured from non-allocated development, through the Council's Community Infrastructure Levy.

*(Currently there is approx. £5m secured through s106 agreements for open space projects within the SADPD towns)*

## **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?

The trajectories for the site allocations are set out within the latest published monitoring report; the link to this is within the submission documentation - 'Cornwall Monitoring Report':

<https://www.cornwall.gov.uk/media/30427467/amr-final-211217.pdf>  
(Document library ref: E6)

Within the Cornwall Monitoring Report webpage, the key reports that provide the information requested is the:

- Five year supply statement and appendices (August 2017); and
- Housing Implementation Strategy and the related trajectories (August 2017).

The implementation strategy provides the background as to how delivery was assessed and the trajectories show the detail of delivery on a site by site basis including the proposed allocations. For your information, an earlier version of the Implementation Strategy was considered by the inspector during the LPSP examination and he concluded in his Sep-16 report (ref. PINS/D0840/429/12) that it provided the necessary justification that the target could be achieved (paras 142, 143, 145 & 149).

The specific link, which sets out the trajectory for the site allocations, is below (the allocations are set out at the end of the spreadsheet, from row 461)

<https://www.cornwall.gov.uk/media/28099131/cornwall-ht-2016-17-final.xls> (Document library ref: E7.2)

The quantum of development anticipated within the plan period from the site allocations, corresponds to the quantum of development set out in the housing spreadsheet is discussed in answering Q12 below.

## **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.

### **Housing**

To provide the most up-to-date position, the Council can now rely upon the monitoring data as at 1/4/17 (rather than the 2016 data contained within the Allocations DPD and evidence document). This information is contained within the link to the 'Cornwall Monitoring Report' link provided as part of

the evidence submitted. Within the Cornwall Monitoring report website, the data is contained within the 'Cornwall Housing Implementation Strategy' report: <https://www.cornwall.gov.uk/media/28103322/cornwall-local-plan-housing-implementation-strategy-2017.docx> (Document library ref: E.7)

Summary data (as at 1/4/17) for each of the towns covered by the Allocations DPD is contained within this report, with the exception of anticipated delivery from Urban SHLAA sites, which is discussed within the housing evidence reports for each town that was submitted.

For clarity, all of this information has been summarised into a single table, including Urban SHLAA; this can be found within the submitted summary of responses to the pre-submission consultation 'Overall Comments' spreadsheet that summarises the pre-submission consultation representations (see last tab 'Updated Housing Delivery Data (Table 2) on spreadsheet): <https://www.cornwall.gov.uk/media/28958936/overall-reps.xlsx> (Document library ref: C.10)

Finally, this table also highlights the variation in anticipated provision. This relates predominately to four areas: Hayle (119%); Newquay (143%); Helston (118%); and Saltash (113%). The reason for this anticipated higher delivery rates for these areas are as follows:

- Hayle – The primary housing allocation is Trevassack; its size was extended to ensure the proposed new A30 junction options were accessible from the site; so that the allocation could support its delivery, if it was later determined that there was a need/aspiration to bring forward the junction ahead of schedule (i.e. within the Plan period)
- Newquay – Despite Newquay already being close to having sufficient permissions and completions to deliver its LPSP target, three sites (NQ-H1, NQ-H2 and NQ-M2) were still allocated, as they all contain parts of the Newquay Strategic Route, which represents an important piece of highway infrastructure to support the delivery of the Newquay Growth Area and the wider economic ambitions for the area (this is set out in para 8.29 of the SADPD)
- Helston – This reflects the permissions that are within the system
- Saltash – This reflects the permissions that are now within the system

## **Employment**

**Appendix 4** sets out the latest position (1/4/17) with regard to office and industrial space permissions and completions. This will be published in the 2017 Annual Monitoring Report before the end of the year.

## **Retail**

No targets have been set within the LPSP regarding the delivery of retail floorspace within the Plan period, which means annual monitoring data is not published (although 'Town Reports' have been published on the Council's website that provides commentary on changes within the town centres, including highlighting any significant retail development).

The submitted Retail Study Update, highlights potential capacity for further retail floorspace by the end of the plan period, which is summarised within the Allocations DPD's Retail Evidence Summary – June 2017 (pages 8 and 9): <https://www.cornwall.gov.uk/media/26887194/cornwall-site-allocations-dpd-retail-report-v3-01-06-17.pdf>

Information setting out permissions and completions for retail floorspace within the Plan period, at 1/4/17, is set out in **Appendix 5**.

### **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?

In the cases of PZ-M1 and PZ-M2 the reason figures were not given within the policy in relation to the number of dwellings that is required, is because the Council wanted to give maximum flexibility to the future masterplanning process for these mixed use sites to come up with the appropriate quantum of dwellings. However the Council still wanted to recognise them within the housing evidence report, so attributed quite modest figures against them.

With regard to PZ-M3, the Allocations DPD policy is no longer supporting the delivery of housing within the site; plus the Penzance Housing Evidence report, within Table 14, which summarises delivery from allocated sites, no longer includes the PZ-M3 site.

### **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.

The starting point for calculating the number of dwellings was based upon 35dph, on 70% of the site area; however many of the sites vary from this base position due to site specific characteristics. **Appendix 6** sets out a spreadsheet with the calculations for each of the housing allocations, plus an explanation as to why the Council used an amended calculation for some sites.

## 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.

The CIL *Draft Charging Schedule* defines Strategic Sites as sites identified in the SADPD. Sites included in the SADPD have been identified as necessary to ensure the delivery of the policies of the *Cornwall Local Plan – Strategic Policies* document, notably the area and town based housing and employment targets. Strategic sites are not defined by size because of the different requirements and circumstances of the respective areas and towns.

The proposed CIL has a zero rate for housing allocations in the SADPD. The proposed CIL charging zone 5 also has a zero charge but based on the findings of the viability study.

The basis for the proposed zero charge CIL on Strategic Sites is twofold; effective delivery of infrastructure relating to specific sites and the practicalities of implementing the CIL. The key factors in these considerations are:

- The scale and nature of most of these sites and their associated infrastructure requirements can be identified and require substantial infrastructure, including on-site infrastructure, as set out in the SADPD;
- S106 is the preferred funding mechanism for these sites and areas in order to provide: greater certainty of funding for key infrastructure projects; timely delivery of this infrastructure; the potential to secure contributions in excess of what the CIL might yield; and opportunities for economies of direct delivery by developers;
- The S106 approach ensures that the infrastructure funding is fairly and reasonably credited and appropriate funds raised based on the abnormal burden of the Strategic Sites on the infrastructure and is not underfunded through moderated CIL charge; and
- Simplicity and ease of operating the CIL; the CIL's five charge zones already provide a complex geography for implementing the CIL. The Allocations DPD provides a clear framework for the collection of infrastructure funding through S106 or similar agreement form Strategic Sites (for the reasons given above). Reliance solely on S106 allows for a consistent approach to strategic sites (as allocations) without the creation of an overly nuanced sub set of charge zones

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