
Position Statement

- 1.01 Hallam Land Management controls land at Upper Chapel and which comprises:
- i. land subject to outline planning permission reference PA14/08184 with Reserved Matters submitted for approval (reference PA17/09517) pursuant to the outline permission; and
 - ii. adjacent land to the west with capacity for around 85 dwellings.
- 1.02 Representations have been submitted at the Preferred Options and Pre-submission stages of and both previous stages of the plan in relation to the adjacent land. This position statement should be read in conjunction with our representation reference 139b.
- a. Is the CSADPD sound as a whole if the individual town site allocations are found to provide for the timely and effective implementation of the respective town strategies with respect to the numerical requirements of the adopted Cornwall LPSP?
- 1.03 If that were the case, yes, we believe that the Plan would be sound. However, we are concerned that the individual town allocations in respect of Launceston do not offer certainty in respect of timely implementation, due to reliance on infrastructure provision and due to the overall scale and complexity of the combination of proposals upon which the Council relies. We offer further comment as part of our **Matter 10 Position Paper**.
- b. Is the existing housing land supply situation in each town based on robust, up to date evidence?
- 1.04 We do not believe that the evidence used to identify preferred sites (and ultimately those now identified for allocation) is suitably robust. We deal with the specific considerations as part of our **Matter 10 Position Paper**.
- c. Do the housing land allocations of the CSADPD make a sufficient contribution to the overall and five year housing land supply requirements of the adopted Cornwall LPSP 2010-2030?
- 1.05 Whilst the housing land allocations made at Launceston are intended to contribute to ensuring that the five-year housing land supply is met, in our view, there is a risk that they will not do so due to delays in implementation. We have no doubt that the both developers and LPA will do their utmost to secure development in a timely way, but in our view, the complexity of the relationship between a number of sites, and the infrastructure to serve them, means that there is a material risk that development will be delayed.

d. Do the employment (commercial, industrial and retail) land allocations of the CSADPD make a sufficient contribution to the employment land supply requirements of the adopted Cornwall LPSP?

1.06 We do not wish to comment.

e. Does the CSADPD make effective provision for the delivery of necessary highway and other infrastructure necessary to the implementation of the respective town strategies?

1.07 At Launceston, provision is made for highway works to serve the proposed housing and employment allocations, and to achieve wider benefits. For the reasons set out in our **Matter 10 Position Statement**, we have concerns that sufficient certainty exists to ensure that the CSADPD is robust in its provisions.

f. Does the CSADPD make appropriate provision for open space and sports pitches and green infrastructure with reference to current guidance?

1.08 We do not wish to comment.

g. Does the CSADPD make appropriate provision for the protection of European wildlife habitats (in advance of the adoption of a European Sites Mitigation SPD)?

1.09 We do not wish to comment.

h. Should the Purpose and Definition of 'Direction of Growth' allocations be clarified by way of a MM to the Plan text?

1.10 The Council has proposed a MM to the text of the CSADPD to provide clarity on this matter (**CS4.1 MM1**). This aids clarification of the intention of setting out a direction of growth, but it offers so no certainty as to the actions to be taken in the case of a failure of allocated sites to deliver in a timely way. Where these 'Direction for Growth' sites are extensions to proposed allocations, a cumulative delivery risk arises. In our view, further sites should be identified to ensure that the Plan's housing requirements are met.

i. Should the 'retail requirement' of the Plan be clarified in the absence of any retail allocations in the towns by way of a MM to the Plan text?

1.11 We do not wish to comment.