

Cornwall Site Allocations Development Plan Document

Position Statement on Behalf of Redrow Homes (205)
Matter 1 – General Considerations

January 2018

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1.0 INTRODUCTION

- 1.1 This Matter 1 Position Statement has been prepared on behalf of Redrow Homes (Participant Number 205) in relation to the Cornwall Site Allocation Development Plan Document (CSADPD) and Redrow Homes' land interests at Coyte Farm to the south of Truro Road (A390), St Austell. We are promoting the land at Coyte Farm for around 300 homes as a new strategic allocation to the south west of St Austell, and a full planning application for 150 homes has been drafted for submission this March 2018.
- 1.2 We are promoting Coyte Farm for allocation on the basis that we consider that Cornwall Council does not have a demonstrable five year land supply (5yIs). Coyte Farm meets the requirements of Paragraph 14 of the NPPF, and proposals for 150 homes on the site have been tested through pre-application and planning applications. The timing of the CSADPD is helpful as it presents an opportunity to promote a larger site for 300 homes, making a more significant contribution to Cornwall's housing supply. A site plan of Coyte Farm is included below.



2.0 RESPONSE TO MATTER 1 QUESTIONS A, B AND C

Question 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?

- 2.1 We consider the CSADPD to be unsound. Our assessment of Cornwall's housing trajectory concludes that Cornwall cannot demonstrate a five year land supply (5yIs), and only has a supply of 4.2 years (see Figure 1 – 3 enclosed). As such, the CSADPD fails the test of being effective or positively prepared (Paragraph 182 of the NPPF), because it is not prepared based on a strategy which seeks to meet objectively assessed development requirements.
- 2.2 The NPPF is clear that the Government's preferred approach is for local planning authorities to prepare a single Local Plan for its area. While additional Local Plans can be produced, such as a separate site allocations document, there should be a clear justification for doing so. As such, the CSADPD is a 'local plan' as defined by the NPPF and must therefore meet the tests of a local plan.
- 2.3 To comply with the NPPF and for an Inspector to find the Plan sound it needs to be able to deliver a 5yIs; and have sufficient flexibility to ensure it delivers the Local Plan Strategic Policies (2016) housing requirement of at least 52,500 homes over the plan period. The plan in its current form, does not do this and is, therefore, not sound. Unless the CSADPD allocates additional sites it will become out of date and at risk of challenge early on in the process. The CSADPD cannot be found to be consistent with the NPPF or based on an up-to-date objectively assessed need for housing in accordance with paragraph 47 of the NPPF.
- 2.4 This matter was tested through the recent North Somerset Council (NSC) Site Allocations Examination, where the Inspector concluded that in order to be found sound and deliver their Local Plan housing requirement, NSC must identify sites to deliver an additional 2,500 homes in their SA DPD. This would not increase the overall Local Plan Housing target, but would identify further new residential allocations necessary to deliver the Local Plan housing requirement, taking into account the need to supply deliverable sites and to ensure that the Council could maintain a 5yIs.

Question B Is the existing housing land supply situation in each town based on robust, up to date evidence?

- 2.5 The stated purpose of the CSADPD is to allocate land to support the spatial vision and objectives of Cornwall and the communities they sit within. The Spatial Vision set out in Policy 2 (Spatial Strategy) of the Cornwall Local Plan is to maintain the dispersed development pattern of Cornwall and provide new homes based in the role and function of each place. Strategic scale growth will be accommodated in Cornwall's main towns and cities where they can best support regeneration and sustainable development. Policy 2 further states that proposals will be welcome which support the economic regeneration of St Austell as a centre for retail, business and leisure. Policy 2a sets out key targets including the provision in the period to 2030 of a minimum of 52,500 homes at an average rate of about 2,625 per year to meet future requirements, including meeting affordable housing needs. This housing is apportioned through a series of Community Network Areas (CNAs), and allocates a housing requirement of 2,900 homes for St Austell, with a residual requirement of 300 homes (although there is no plan showing the boundaries between the CNAs). It is difficult to see how these core principles of the Local Plan have fed into and shaped the CSADPD, in that St Austell is identified as Cornwall's biggest town, but only 2,900 homes are apportioned to it and allocated in the CSADPD.
- 2.6 Of the 2,900 home apportionment to St Austell, the CSADPD identifies a net windfall projection of 171 homes, net additional urban capacity at 70 homes, and a residual target of -51 homes. Given the issues we identify in this Position Statement with Cornwall's housing supply, and the lack of contingency sites in the CSADPD, it is likely that further sites will need to be allocated. St Austell as Cornwall's biggest town would be an appropriate location to meet this need, particularly to respond to the significant need for affordable homes in St Austell. In this respect we believe that the CSADPD fails to deliver Cornwall Local Plan policy 6 (Housing Mix) and 8 (Affordable Housing).
- 2.7 We are promoting the allocation of land for 300 homes at Coyte Farm and will be submitting a full planning application for 150 homes with 45 affordable homes (30%) during the CSADPD Examination in March 2018. Further detail is provided in our Position Statement to Matter 8. Allocating Coyte Farm would ensure sufficient choice and flexibility of new homes; offering an opportunity to compensate for delays in the delivery of those sites currently identified in the Site Allocation DPD. In this way, the purpose of the CSADPD to deliver the housing requirement for the Local Plan and to ensure the maintenance of a 5yls is more likely to be achieved. Proposals for residential development at Coyte Farm have previously been dismissed by Cornwall Council for not being allocated in the CSADPD. However, we consider that residential development at Coyte Farm can

be considered as consistent with the Local Plan, and that not allocating sufficient sites in St Austell is in conflict with the Local Plan.

- 2.8 Policy 3 sets out the role and function of places and under the terms of Policy 3 delivery of housing should be through the CSADPD or a Neighbourhood Plan. At the recent Quintrell Downs Informal Hearing (Ref: APP/D0840/W/17/3177729), where the planning appeal was allowed on 20th December 2017 and planning permission (Ref: PA16/12055) granted for 140 homes, the Inspector queried what the Cornwall Local Plan says on windfall developments or unallocated sites, and whether it sets a criteria policy test, or a limit. The response from Cornwall Council was that the Local Plan does not include policy on windfall developments, just a guiding principle that windfall developments are considered to be under 10 units, but there is no definition in the text about scale. The Inspector therefore concluded that if the Local Plan is silent, then the titled balance of the presumption in favour of Sustainable Development through Paragraph 14 of the NPPF applies.
- 2.9 The Cornwall Local Plan is silent on windfall in urban areas. Previous discussion by Members at Cabinet in approving the CSADPD for submission on the matter of unallocated sites is that they should be limited to 150 homes and relative to the size of the town. Given that St Austell is the biggest town in Cornwall, it would seem appropriate for 150 homes to be the suitable size for unallocated, sites in St Austell.
- 2.10 In determining the Quintrell Downs Appeal, the Inspector concluded that although the proposal would not be in accordance with Local Plan Policy 3 as it would represent development which is not managed through the CSADPD, it would comply with Policy 2 in that it would represent strategic scale growth accommodated in a main town. As Policy 2a sets out a minimum number of dwellings to be provided the proposal would accord with this policy. It would also comply with Local Plan Policy 7 in that it would not represent new housing in the open countryside, although there would be limited harm to the landscape. Taking the Local Plan as a whole, the Inspector was satisfied that the proposal would be in accordance with its provisions. As such it would represent sustainable development and planning permission should be granted. There are clear parallels between this site and its consideration against the Local Plan policies and the opportunity at Coyte Farm. Coyte Farm represents a sustainable site in line with Paragraph 14 of the NPPF.
- 2.11 Policy 7 of the Local Plan indicates that in the open countryside new homes will only be permitted where there are special circumstances with new dwellings. As set out in Paragraph 168 of the Local Plan, in determining a settlement, consideration should be

given to proximity, accessibility and relationship of a smaller village or hamlet to other settlements, facilities, employment and services required for day to day living. On this basis, we consider that the Coyte Farm site does not fall within the open countryside. Coyte Farm is immediately south of Truro Road (A390) and bordered by disused quarries either side, and as set out in the table below, is well connected by the services, amenities and transport infrastructure of St Austell.

<i>Service/Facility</i>	<i>Distance from site</i>	<i>Approximate journey time on foot ⁽¹⁾</i>	<i>Approximate journey time by bicycle ⁽²⁾</i>
<i>The Park Medical Centre</i>	<i>1,100m</i>	<i>14 minutes</i>	<i>3.5 minutes</i>
<i>St Mewan Community primary School</i>	<i>600m</i>	<i>8 minutes</i>	<i>2 minutes</i>
<i>Pondhu Primary School</i>	<i>650m</i>	<i>8 minutes</i>	<i>2 minutes</i>
<i>St Austell Library</i>	<i>2,000m</i>	<i>25.5 minutes</i>	<i>6 minutes</i>
<i>Poltair School</i>	<i>2,600m</i>	<i>33 Minutes</i>	<i>8 Minutes</i>
<i>Cornwall College – St Austell</i>	<i>3,000m</i>	<i>38.5 minutes</i>	<i>9.5 minutes</i>
<i>Cornwall Council Office</i>	<i>900m</i>	<i>11.5 minutes</i>	<i>3 minutes</i>
<i>West Hill Retail Centre</i>	<i>1,100m</i>	<i>14 minutes</i>	<i>3.5 minutes</i>
<i>Pentewan Road Retail Centre</i>	<i>1,200m</i>	<i>15 minutes</i>	<i>3.5 minutes</i>
<i>St Austell Town Centre</i>	<i>1,400m</i>	<i>18 minutes</i>	<i>4.5 minutes</i>
<i>Closet Bus Stop – Outside St Mewan School</i>	<i>400m</i>	<i>5 minutes</i>	<i>1 minute</i>
<i>St Austell Railway Station</i>	<i>1,500m</i>	<i>19 minutes</i>	<i>5 minutes</i>
<i>Western Inn</i>	<i>1,100m</i>	<i>14 minutes</i>	<i>3.5 minutes</i>
<i>St Austell Golf Club</i>	<i>1,800m</i>	<i>23 minutes</i>	<i>5.5 minutes</i>
<i>The Cornwall Hotel Spa</i>	<i>1,900m</i>	<i>24 minutes</i>	<i>6 minutes</i>
<i>Poltair Football Ground and Leisure Centre</i>	<i>2,300m</i>	<i>29.5 minutes</i>	<i>7 minutes</i>

- 2.12 If the purpose of the CSADPD is to allocate land to deliver the spatial objectives of the Local Plan, it is failing this purpose, in that the Local Plan spatial strategy sets out that growth should be directed to Cornwall's biggest towns. Despite this, the CSADPD only allocates sites to deliver 2,900 homes in St Austell, Cornwall's biggest town, and this number is driven by the minimum Local Plan housing target, and the CSADPD does not seek to go above this to protect against under supply and site delivery issues. As such, the delivery policies of the Local Plan and CSADPD do not combine to create a positive framework for the delivery of the overall housing requirement of at least 52,500 homes and meeting affordable housing needs. In this respect, it is not 'positively prepared', as required by Paragraph 182 of the NPPF, 2012, and the CSADPD is therefore unsound.

Question 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?

2.13 Despite the Local Plan housing requirement being a minimum, and the Local Plan Inspector making it clear that it must be treated accordingly, the CSADPD only allocates sites to deliver the minimum Local Plan figure of 52,500 homes. There are no reserve sites included in the CSADPD to provide a contingency to account for any potential site delivery issues.

2.14 To meet the minimum housing requirement of 52,500 homes, the council needs to deliver on average 2,625 homes each year from 2010 until 2030. The table below demonstrates that since the beginning of the Plan period Cornwall Council have fallen short of this average by a total of 1,335 homes, which already equates to a 7% shortfall.

Year	Actual Completions	Deficit (out of 2,625 p/a)
2010/11	2060	-565
2011/12	2375	-250
2012/13	2278	-347
2013/14	2040	-585
2014/15	2702	+77
2015/16	2536	-89
2016/17	3049	+424
7-year Req: 18,375	Total Completions: 17,040	Deficit: -1,335 homes

2.15 Cornwall Council should be incorporating the allocation of a reserve of developable sites alongside a release mechanism, as recommended by the Government's appointed Local Plans Expert Group (LPEG). The LPEG Report (March 2016) advises that:

"We recommend that the NPPF makes clear that local plans should be required not only to demonstrate a five-year land supply but also focus on ensuring a more effective supply of developable land for the medium to long term (over the whole plan period), plus make provision for, and provide a mechanism for the release of, developable Reserve Sites equivalent to 20% of their housing requirement, as far as is consistent with the policies set out in the NPPF. Reserve Sites represent land that can be brought forward to respond to changes in circumstances." (Para: 11.4)

- 2.16 Cornwall Council's Five-Year Supply Housing Statement (August 2017) indicates that the Council considers that it has 6.2 years' supply (based on a requirement of 17,057 homes with a 20% buffer). Cornwall Council's previous Five Year Supply Statement published in April 2017 stated the authority had 5.2 years supply. It seems unrealistic that the figure can have increased so significantly in just four months, to 6.2 years. Historically, the council's stated supply has been borderline at best and particularly fragile. There is doubt as to whether the authority can deliver the minimum number of homes apportioned to each town at the necessary rates.
- 2.17 We have reviewed Cornwall Council's Housing Trajectory 31st March 2017 which forms part of the evidence base for the CSADPD. We assessed progress and delivery of: sites in St Austell; and strategic sites of 100+ homes. Our assessment (see Figure 1 – 3 appended) found a discrepancy in the trajectory of 2,622 homes. Applying a 10% reduction on the remaining supply to account for delivery issues, we identify a supply of 4.2 years with a 20% buffer, or 4.8 years with a 5% buffer.
- 2.18 Following our review, it is evident that there are flaws with the Council's anticipated housing trajectory and we dispute a number of the sites that the Council consider will be delivered over the next five years. Cornwall Council's stated housing delivery within the Plan period is over-estimated, which creates a significant risk that the Council will fail to deliver a 5yls, rendering the CSADPD unsound.
- 2.19 During the Local Plan Examination, it was agreed that the housing trajectory should be considered only as an illustrative example of housing delivery, as the Examination did not assess individual sites in detail. To this end, the Inspectors' Report states:

"Because the trajectory is based on the Council's expected delivery rates at various sites which have not been examined in detail in this examination...the trajectory should be labelled as illustrative only." (Para. 144)

- 2.20 In our representations to the CSADPD in August 2017, we queried Cornwall's stated 5yls. In the latest evidence base, Cornwall Council has responded to some of our comments. We would respond to Cornwall Council's comments as follows:

- We reiterate that, as made clear by the Inspector in his report on the Cornwall Local Plan, that the Council must not be applying the 52,500 housing requirement as a ceiling to development. Cornwall Council has a long history of under-delivering their housing requirement, and applying a maximum housing number with no buffer will only exacerbate this issue further.

- The Local Plan does not allocate sites, so it is imperative that the CSADPD allocates a sufficient number of sites to meet Cornwall Council's housing requirement. In its current form, the CSADPD fails to allocate enough sites to deliver sufficient housing or protect Cornwall against planning by appeal on the basis of Paragraph 49 of the NPPF. Cornwall Council is missing a key opportunity to lead the allocation of appropriate sites, by not allocating a sufficient number of sites, or including reserve sites. This runs the risk of Cornwall Council having an under supply again.
- We remain of the view that Cornwall Council's Housing Trajectory March 2017 is flawed.

2.21 To comply with the NPPF and for an Inspector to find the CSADPD 'sound' it needs to be able to deliver a five-year supply of housing land; and have sufficient flexibility to ensure at least 52,500 homes are delivered over the plan period. The CSADPD in its current form, does not do this and is, therefore, not sound.

3.0 CONCLUSION

- 3.1 As drafted, the CSADPD allocates an insufficient number of sites to achieve the Local Plan's housing requirement and the trajectory does not demonstrate a 5yls. The CSADPD is therefore unsound in accordance with Paragraph 182 of the NPPF.
- 3.2 Additional housing allocations are required to ensure sufficient choice and flexibility of new homes; and offering an opportunity to compensate for delays in the delivery of those sites currently identified in the CSADPD.
- 3.3 New housing should be allocated on land in the most sustainable locations. The most sustainable location is confirmed as land to the south west of St Austell and at Coyte Farm, which the CSADPD St Austell Town Framework (2016) identifies as an area of growth for the town.
- 3.4 There are significant benefits of allocating land at Coyte Farm in terms of the provision of much needed affordable homes, support for local infrastructure; and not least, ensuring that sufficient homes are allocated to enable the CSADPD to deliver the housing requirement for the Local Plan and to ensure the maintenance of a 5yls is more likely to be achieved.
- 3.5 To ensure the CSADPD can be found sound, the following needs to be considered:
- The Council needs to be proactive in its delivery of new homes, particularly as the Local Plan's housing requirement of 52,500 homes is a minimum figure not a ceiling. Previous housing delivery rates indicate that Cornwall Council has a history of under-delivery, and to this end the Council will need to allocate a sufficient number of sites if they are to deliver the Local Plan housing requirement and maintain a 5yls.
 - The Council stated 5yls is over ambitious and flawed and is a risk of failing, or challenge via planning appeal.
 - Our own assessment of the Council's land supply results in a supply of 4.2 years. Additional land at Coyte Farm would help ensure that a 5yls can be maintained.
- 3.6 As recognised in the CSADPD, St Austell is the largest town in Cornwall with significant housing and affordable housing need. We therefore consider that there is a requirement to increase the housing provision in the town to address this need.

- 3.7 The Coyte Farm site is immediately available and is subject to a forthcoming full planning application. Redrow Homes is committed to development of a first phase of 150 homes within the next five years of the CSADPD.
- 3.8 In conclusion, allocating the land at Coyte Farm for 300 homes would provide added flexibility to the Plan and would allow the Council to meet its housing need; and help maintain a 5yrs, ensuring that the CSADPD is effectively and positively prepared in accordance with Paragraph 182 of the NPPF.

FIGURE 1

**BARTON WILLMORE'S ASSESSMENT OF
CORNWALL'S 5-YEAR LAND SUPPLY**

Figure 1 – Barton Willmore’s Assessment of Cornwall’s 5-year Land Supply

Requirement		Calculation	5% Buffer	20% Buffer
A	Annual Requirement		2,625	2,625
B	Identified Shortfall	Cornwall Council’s identified shortfall	1,310	1,310
		Unlawful dwellings identified by Cornwall Council	-235	-235
	(1,310 - 235)	Total	1,075	1,075
C	5-year requirement	(A x 5) + B	14,200	14,200
D	Buffer	C x Buffer	710	2,840
E	5-year requirement including buffer	C + D	14,910	17,040
F	Revised annual requirement including buffer	E / 5	2,982	3,408
G	Supply	Council’s Supply (2017-2022) = 18,572 Barton Willmore Supply (2017-2022) = 15,950 Minus an additional 10% buffer = 14,355		
H	5-year land supply position	G / F	4.8	4.2

FIGURE 2

TABLE OF DISPUTED SITES

FIGURE 2 TABLE OF DISPUTED SITES – ASSESSMENT OF CORNWALL HOUSING TRAJECTORY TO 31ST MARCH 2017 & LAND OFF MOUNTSIDE ROAD, PAR APPEAL (REF: APP/D0840/W/16/3162355) SUBMITTED EVIDENCE “TABLE OF DISPUTED SITES.”

Review of sites: in St Austell, and sites over 100 homes

Site	5yls	17 / 18	18 / 19	19 / 20	20 / 21	21 / 22	Discrepancies: trajectory / site capacity	Comment
ST AUSTELL SITES								
Higher Trehiddle Farm, St Austell PA14/12161 Outline for 460 homes 27/07/17	BW	0	0	0	0	20	35	<ul style="list-style-type: none"> One condition discharged. No reserved matters progressed. 2020 start unrealistic, 2021/2022 more realistic given no RM progressed and housebuilder not secured.
	LPA				20	35		
Carlyon Bay, St Austell PA14/10875 RM pursuant to PA11/01331 for 511 homes 23/02/15	BW					0	35	<ul style="list-style-type: none"> One other RM approved 27/08/17, no conditions progressed. Whole site in question.
	LPA					35		

Site	5yrs	17 / 18	18 / 19	19 / 20	20 / 21	21 / 22	Discrepancies: trajectory / site capacity	Comment
Land at Holmbush Rd, St Austell PA13/09195 SHLAA ref S454 (whole site) Outline for 190 homes 10/06/15	BW			30	30	30	23	<ul style="list-style-type: none"> One condition discharged. No reserved matters submitted. As such start 2019/2020 more realistic. 35 dpa unrealistic. Therefore a reduction to industry standard for site of this size and type to 30 dpa 2019 – 2024 (minus 25) (see Figure 3 - Standard industry lead in times and build rates).
	LPA		8	35	35	35		
Land at the corner of Tregorrick Road and Porthpean Road, St Austell PA14/01101 Full for 131 homes 20/02/2015 - PA15/11368 reduced to 101 homes	BW	0	16	16	16	17	36	<ul style="list-style-type: none"> The online planning records indicate that planning conditions remain to be discharged, so completion of 21 homes 2018/2019 is unlikely
	LPA	0	21	35	35	10		
	LPA	0	0	0	0	0		
Duporth Holiday Village, St Austell C2/09/01152 Outline for 48 homes 16/12/10	BW	0	0	0	0	0	48	<ul style="list-style-type: none"> Trajectory assumes 39 to be constructed 2017/2018, but no evidence of this. Midas Homes
	LPA	39	9	0	0	0		

Site	5yrs	17 / 18	18 / 19	19 / 20	20 / 21	21 / 22	Discrepancies: trajectory / site capacity	Comment
Western National Ltd, Eliot Road Full for 30 homes PA14/06870	BW						30	<ul style="list-style-type: none"> No conditions discharged or planning activity since 2014 - permission expires in May 2018
	LPA	13	17					

Site	5yrs	17 / 18	18 / 19	19 / 20	20 / 21	21 / 22	Discrepancies: trajectory / site capacity	Comment
STRATEGIC SITES								
Land south of Priory Road, Bodmin Outline consent granted for 572 dwellings (to the south) and 178 dwellings to the north of Priory Road in June 2016 (PA12/12115)	BW	0	0	10	35	35	77	<ul style="list-style-type: none"> • RM application submitted Oct 2017 for 178 dwellings (Phase 1 - PA17/09582) • Assumed determination date – April 2018 • Based on a decision in April 2018 – delivery in Oct 2019 (1.5 years) • 2.5 dwellings per month (30 dwellings a year)
	LPA	0	0	17	70	70		
Land At Tuckingmill/Church View Farm Camborne Outline consent granted for 296 homes August 2012 (PA10/08671)	BW	0	0	10	35	35	22	<ul style="list-style-type: none"> • RM application submitted April 2017 still awaiting decision (PA17/04068) • Assume decision in April 2018 • Delivery – October 2019 (1.5 years) • 2.5 dwellings per month as per build rates in standard industry table
	LPA	0	0	35	35	35		
Land At Tolgus Tolgus Redruth Outline consent granted May 2013 for 370 dwellings (PA12/09717)	BW	0	0	30	50	50	57	<ul style="list-style-type: none"> • RM consent for 370 dwellings issued July 2016 • Based on industry timescales delivery start in February 2018 • Reduced delivery in line with industry lead in times
	LPA	0	0	47	70	70		

Site	5yrs	17 / 18	18 / 19	19 / 20	20 / 21	21 / 22	Discrepancies: trajectory / site capacity	Comment
Redruth Brewery/Plumbase Foundry Row Chapel Street Redruth Outline consent granted March 2015 for 160 dwellings (PA13/07918)	BW	0	17	35	35	35	35	<ul style="list-style-type: none"> RM application required to be submitted by March 2018 No RM application submitted to date but dwellings to be delivered in 2018/2019
	LPA	0	0	17	35	35		
Langarth Farm, Three Milestone, Turo Outline Consent granted July 2013 for 1500 dwellings (PA11/06124)	BW	0	0	50	50	50	124	<ul style="list-style-type: none"> Reserved Matters consent granted for 494 dwellings in October 2016 (PA15/11489) Condition discharge for conditions 8,11,12, 14 & 30 of outline consent (Approved 2017) 8, 12 & 30 not discharged – require further info NMA approved July 2016 in relation to condition 2 to extend the permission - Application for approval of the first of the reserved matters shall be made to the local planning authority before the expiration of 3 years from the date of this permission. An application for approval of the final reserved matters shall be made before the expiration of thirteen years from the date of this permission (10 July 2026). Is this lawful?

	LPA	0	64	70	70	70		<ul style="list-style-type: none"> • Condition 5- Mini Design Code and Parameter Plan required for each phase before submission – none submitted • Not clear whether there is a developer on board • News article suggest that the Council are aiming to start on site in 2018 http://www.cornwalllive.com/news/cornwall-news/stadium-housing-cornwall-langarth-truro-770069 • Based on industry timescales delivery would start in April 2018 (1.5 years from RM consent) but given the uncertainty over developer etc evidenced by the news article I have pushed out delivery for another year to April 2019 • Reduced build out rates to 50 a year as per build rates in standard industry table
Land at Maiden Green off A390 Kenwyn	BW	0	0	0	50	50	45	<ul style="list-style-type: none"> • Hybrid planning application comprising outline for 515 dwellings, school, shop, district centre etc. (PA14/00703) Approved August 2016 • No RM application submitted. • Based on industry lead in times (2.5 years) February 2019 for first delivery. No reason to query lead in time • Reduced delivery rates based on 50 a year
	LPA	0	0	5	40	70		

Site	5yrs	17 / 18	18 / 19	19 / 20	20 / 21	21 / 22	Discrepancies: trajectory / site capacity	Comment
Land at West Carclaze and Baal Carludon Outline application for 1500 still pending. Submitted Jan 2015 (PA14/12186)	BW	0	0	8	50	50	107	<ul style="list-style-type: none"> Not likely that 15 homes will be delivered in 2018/2019 or 2019/2020 given that the consent hasn't been issued, conditions haven't been discharged and no RM application submitted Assumption on decision date – August 2018? First delivery Feb 2021 Reduced build out rates to 50 as per standard industry build rates
	LPA	0	15	60	70	70		
Land At Broadmoor Farm Stoketon Cornwall Hybrid application comprising for up to 1000 units granted in October 2017 (PA14/02447)	BW	0	0	0	50	50	100	<ul style="list-style-type: none"> Based on industry lead in times first delivery April 2020
	LPA	0	0	0	100	100		

Site	5yrs	17 / 18	18 / 19	19 / 20	20 / 21	21 / 22	Discrepancies: trajectory / site capacity	Comment
Land at Chapel Gover Newquay Growth Area Outline application for 800 dwellings still pending. Application submitted May 2015. Decision still pending.	BW	0	0	0	12	50	31	<ul style="list-style-type: none"> • Further PPA signed until March 2018 • Assume decision – August 2018 • First delivery Feb 2021
LPA	0	0	0	23	70			
Tolgarrick Farm, Green Lane, Truro (Barton Willmore) Outline for 320 homes PA12/07283 at appeal 20/12/12 and; RM PA14/02023 14/03/14	BW				50	50	140	<ul style="list-style-type: none"> • Planning Permission for 320 homes. • 10 x conditions discharged, but no submissions since 2014. • Various NMA and RM submissions.
LPA	40	50	50	50	50			
Tuckingmill, Cambourne (PA10/08671) Outline for 296 Homes 17/08/12	BW				25	50	27	<ul style="list-style-type: none"> • Stalled site for 5 years – no conditions submitted. • Reserved matters validated in April 2017 and awaiting decision.
LPA			32	35	35			

Site	5yrs	17 / 18	18 / 19	19 / 20	20 / 21	21 / 22	Discrepancies: trajectory / site capacity	Comment
Hayle Harbour (W1/08-0613)	BW					50	200	<ul style="list-style-type: none"> No reserved matters approved. PPA submitted in relation to RM for 181 homes still pending and key milestone dates provided by applicant are now out of date.
Outline pp for 819 homes 29/06/10	LPA		40	70	70	70		
Broadmoor Urban Extension, Saltash (PA14/02447)	BW				50	50	100	<ul style="list-style-type: none"> No activity since pp was granted No conditions or RM submitted S106 agreed Oct 2017
Outline pp for 1,000 homes 20/11/15	LPA				100	100		
Land at Maiden Green (PA14/00703)	BW				50	50	45	<ul style="list-style-type: none"> No conditions discharged, No RM submitted. Trajectory states it is a full pp, when it is hybrid with only the access in detail.
Hybrid pp for 515 homes	LPA			5	70	70		
Land between A390, Park and Ride and Willow Green Farm (PA12/11527)	BW			30	30	30	3	<ul style="list-style-type: none"> Layout RM approved in January 2017 The Council's comments on the site state: <i>"The Council accept that although a valid planning permission exists on the site, an appeal has been allowed for retail use on the site in October 2016 and so, this casts considerable doubt that the housing will be delivered."</i>
Outline pp for 93 homes 21/03/13 RM app PA16/02385	LPA		30	30	30	3		

Site	5yrs	17 / 18	18 / 19	19 / 20	20 / 21	21 / 22	Discrepancies: trajectory / site capacity	Comment
Joannies Avenue St Ives (PA15/08967) Outline pp for 165 homes 07/03/16	BW				0	0	70	<ul style="list-style-type: none"> Application and Appeal were Withdrawn in April 2017 therefore there is no ongoing application. The Council's comments on the site state: <i>"The Council considers the site suitable on the basis that it resolved to approve the planning application despite it being called in by the Secretary of State. However, until the decision is known the Council accept that the yield from this site should be excluded."</i>
	LPA				35	35		
Maiden Green Farm Truro (PA14/00703) Outline pp for 515 homes 11/08/16	BW				50	50	156	<ul style="list-style-type: none"> No conditions discharged. The Council's comments on the site state: <i>"The Council maintain that it is expected that more than one developer will be expected to deliver the site however whilst the delivery reflects the application of average lead in times and delivery rates the Council accepts the appellants estimate that 70 dwellings could be delivered by 2021 rather than the 186."</i>
	LPA	0	46	70	70	70		
Land East of Quintrell Rd Newquay (PA14/09346) Outline pp for 180 homes 11/05/17	BW				30	30	27	<ul style="list-style-type: none"> Outline permission granted in May 2017. No RM or conditions approved. The Appellant's comments on the site state: <i>"At the time of writing there is no decision and the Section 106 remains outstanding some 1.5 years after the resolution to grant. I discount 10 dwellings as these 10 dwellings were assumed with a S106 being completed by September 2016 which is not the case and it therefore should be pushed back to beyond 5 years."</i> The Council's comments on the site state:
	LPA			17	35	35		

									<p><i>"Mr Harris discounts 10 dwellings on the basis that the S106 agreement has not yet been signed. It is accepted that if the average lead in time is now applied to the site it would exclude these 10 dwellings."</i></p>
<p>Sunnyside, Merritts Hill, Illogan (PA13/08793)</p> <p>Outline pp for 20 homes 25/06/14</p>	BW				3		10	<ul style="list-style-type: none"> • Permission granted June 2014. • The Council's comments on the site state: <p><i>"The officers report recognises that there has been a reduction in the site size that has brought it below the affordable housing requirement but considered that it could not sustain a reason for refusal on this matter. Whilst the site could still deliver 20 units it is considered that when applying the average lead in time and delivery rate to the new permission that the yield should be reduced by 10 units."</i></p> 	
	LPA				3	7			
<p>Royal British Legion, Cambourne (PA14/05937)</p> <p>Full PP for 10 homes 15/12/14</p>	BW	0	0	0	0	0	10	<ul style="list-style-type: none"> • Following the appeal decision, the Council accept that this site is probably not deliverable. • LPA have 10 units to be delivered in 2022-23. 	
	LPA	0	0	0	0	0			
	LPA	20							
<p>Brigantine Lower Market Street, Penryn (PA13/03592)</p> <p>Full pp for 11 homes</p>	BW	0					11	<ul style="list-style-type: none"> • The Council's comments on the site state: <p><i>"This site expired in July 2016 and has already been deducted from the Councils supply figure see Appendix 18 of MC proof"</i></p> 	
	LPA	11							

Land North West of Bodmin Hospital (DP/14/2005HLA) (PA14/07891) RM for 115 homes 30/06/17	BW			30	30	30	85	<ul style="list-style-type: none"> • Permission approved in June 2017 for the re-plan of "RM, for 115 homes, reducing 18 units from the overall scheme – no conditions submitted yet
	LPA	35	35	35	35	35		
HX1 Helston Urban Extension Land west of Trewennack, Helston (PA16/09129) RM – 450 units	BW				50	50	31	<ul style="list-style-type: none"> • Reserved Matters Application was granted on 9th December 2016. • No conditions submitted yet.
	LPA		26	35	35	35		
Land south east of Pennygillam Industrial Estate Slate Quarry Hill, Launceston (PA16/09268) OL – 275 units	BW				50	50	72	<ul style="list-style-type: none"> • Reserved Matters Application for 259 units was submitted in October 2016 • RM application has not yet been decided.
	LPA	32	35	35	35	35		

POSITION STATEMENT

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Land at Trevithick Manor Farm, Trevemper, Newquay (PA14/04743) OL – 455 units	BW				50	50	162	<ul style="list-style-type: none"> Outline permission for 455 units (some matters reserved, access to be decided) was approved on 14th March 2017. RM application has yet to be submitted.
	LPA		37	75	75	75		
Land at Quintrell Road, Newquay (PA13/08874) RM - 297 units	BW				25	50	178	<ul style="list-style-type: none"> Reserved Matters Application was granted on 19th February 2015 – no conditions submitted yet. (3 NMA applications submitted- 2 approved, 1 refused.)
	LPA	50	48	62	64	29		
	LPA			10	30	30		
Land off West Road, Quintrell Downs OL – PA16/12055 (140 units) Appeal: APP/D0840/W/17/3 177729	BW						100	<ul style="list-style-type: none"> Outline Application for 140 units was refused by Council in April 2017. Appeal was then allowed in December 2017 for 140 dwellings. No RM has been submitted yet.
	LPA				50	50		
St Lawrence's Hospital, Bodmin OL - PA16/08465 (175 homes)	BW			5			40	<ul style="list-style-type: none"> RM approved – March 2017 Discharge of one condition – submitted Nov 2017 – still awaiting decision.
	LPA		35	35				

POSITION STATEMENT

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Boiler Works Road, Cambourne Full – PA16/10866 170 units	BW						25	<ul style="list-style-type: none"> Proposed amendment to Outline application – approved Nov 2016. Variation of one Condition – approved June 2017.
	LPA		20	5				
Land off A390 St Anne Chapel, Calstock Outline – PA1603999 141 units	BW			5			21	<ul style="list-style-type: none"> Reserved matters approved- April 2017 Submission of discharge of 5 conditions – Dec 2017 – awaiting decision.
	LPA		14	35				
Land at Kergillack farm, Budock Outline – PA15/03533 300 units	BW	20	20				40	<ul style="list-style-type: none"> RM – Approved April 2015 Discharge of conditions – approved Nov 2015
	LPA	50	50					
Land to North of Viaduct Hill, Hayle Full – PA16/00501 138 units	BW			5			77	<ul style="list-style-type: none"> NMA approved June 2017 NMA approved August 2017 Deed of modification approved May 2017
	LPA	32	35	35				
Land north of Upper Chapel, Launceston Outline – PA14/08184	BW						52	<ul style="list-style-type: none"> RM submitted October 2017- awaiting decision.
	LPA		17	35				

POSITION STATEMENT

Figures

140 units								
Land at Addington, Liskeard	BW			45	45	15	45	<ul style="list-style-type: none"> • RM approved - January 2017 • RM 5 conditions approved - April 2017
Outline – PA16/07313 450 units	LPA		45	45	45	15		
Looe Comprehensive School	BW		15				45	<ul style="list-style-type: none"> • NMA approved - Oct 2017 • No conditions discharged.
Outline – PA10/03413	LPA	30	30					
Trevithick Manor Farm, Newquay	BW						45	<ul style="list-style-type: none"> • RM approved – July 2015 • No conditions discharged • Variation of condition 1 approved – May 2016
Full – PA15/02185 359 units	LPA	45						
Overall Total							2,622	

FIGURE 3

STANDARD INDUSTRY LEAD IN TIMES AND BUILD RATES

Figure 3

Standard industry lead in times and build rates					
Site Status		Site Size/Number of Homes			Notes
		Less than 50 homes	50 to 200 homes	200 plus homes	
Under construction	Lead in time	N/A	N/A	N/A	Build rate applied to residual capacity
	Build rate (per annum)	15 homes	30 homes	50 homes	
Full planning Permission/ Reserved Matters	Lead in time	1 year	1.5 years	2 years	Lead in time to allow for infrastructure provision and construction start up.
	Build rate (per annum)	15 homes	30 homes	50 homes	
Outline Planning Permission	Lead in time	1.5 years	2 years	2.5 years	Lead in time to allow for full permission / reserved matters, infrastructure provision and construction start up.
	Build rate (per annum)	15 homes	30 homes	50 homes	
Sites without Permission	Lead in time	2.5 years	3 years	3.5 years	Lead in time to allow for planning permission, infrastructure provision and construction start up.
	Build rate (per annum)	15 homes	30 homes	50 homes	