



INSP.S4 Matter 3 Hayle Spatial Strategy & Allocations

Cornwall Council Position Statement

02 February 2018

General Issues

a. Is the Strategy for Hayle consistent with the LPSP?

Yes, the Allocations DPD was developed over a period of time, which both supported the production of the LPSP and the strategy for Hayle, as well as the SADPD responding to the LPSP as it was being finalised. The following table highlights some key elements of the CNA objectives set out in the Cornwall Local Plan Community Network Area sections, together with comments on how the SADPD strategy and policies compliment them.

LPSP CNA Objectives <i>(Objectives are summarised)</i>	Comments
<p>Objective 1 – Employment Support new employment schemes both in towns and in rural areas with emphasis on quality and permanent work. High speed broadband. Continue the delivery of regeneration in Hayle associated with the Marine Renewables and development of employment land south of Hayle.</p>	<p>The SADPD vision at 4.5 and key aims 1. 2. and 3. at 4.6 fully support this LPSP objective. The Marine Renewables Business Park is allocated in the SADPD (H-E3) to ensure its continued delivery. Furthermore the employment space allocated within Trevassack H-UE1 and at St Erth H-E2 accord with the objective of development of employment land south of the town.</p>
<p>Objective 2 – Housing To deliver a mix of housing to meet current and future needs, prioritising affordable and specialist accommodation.</p>	<p>The SADPD vision at 4.5 4th bullet point and key aim 7 at 4.6 fully support this LPSP objective. The SADPD strategy aims to support continued delivery of Hayle Harbour at para 4.12 for residential development, and also to the south of the town at Trevassack, which is allocated H-UE1, and will deliver housing within and beyond the plan period. LPSP Policy 6 will apply to all proposals.</p>
<p>Objective 3 – Community Infrastructure Encourage investment in healthcare, education, neighbourhood centres, leisure facilities and open space provision. Create better linkages between Hayle and its surrounding beaches.</p>	<p>Key aim 4. at para 4.6 within the SADPD aims to support improved community facilities. The Trevassack allocation H-UE1 includes requirements for open space and a new primary school. Within the Infrastructure section from para 4.40 it sets out work that has taken place in ensuring investment in healthcare. Education requirements are set out at para’s 4.35 and 4.36 with proposed expansion at two primary’s schools and also a new school proposed. The GI strategy at para 4.63 explains that better links between the town and beach are a key objective, and this is illustrated on the GI Strategy map Fig. H3, and the Transportation map Fig. H2.</p>
<p>Objective 4 – Environment Ensure development is sensitive to the outstanding natural, built and historic environment of the area, particularly</p>	<p>The 3rd bullet point of the vision at para 4.5, and key aim 8. at para 4.6 aim to support this LPSP objective. All site allocation policies except H-E3 at St Erth and H-HS1</p>

sensitive to the WHS status of Hayle, giving careful consideration to the location, scale and design of all new development.	Tolroy Safeguarding area (due to location) contain policy requirements for development to consider the setting of the WHS designation. All polices have been informed by the Heritage Evidence base (D3) and been subject to heritage impact assessment. The Housing Evidence Base report (D11.1) sets out how environmental designations informed the site allocation process.
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In summary a key aim of the overall SADPD strategy for Hayle is to continue the regeneration around Hayle Harbour, providing jobs and homes, whilst ensuring development is high quality and sensitive to the World Heritage Site designation, which aligns with the LPSP strategy and objectives for the town. Furthermore the allocation H-UE1 south of the town will deliver homes, jobs and community facilities to the south of the town. The (submitted) Hayle Neighbourhood Plan will also support the CNA objectives.

b. Is the existing housing land supply situation based on robust, up to date evidence?

Yes. The Council has provided an updated position (as at 1/4/17) to supplement the data that was provided at the time of submission (which was based on figures as at 1/4/16). This updated information is set out in the Council's response to the inspectors' questions – INSP.S6 (CC.S4.4).

c. Is the approach to the selection of sites for allocation consistent with Strategy?

Yes. As set out in the Hayle Housing Evidence Based Report (D11.1), the Council first sought to identify appropriate sites within the existing urban area to help meet the growth targets set by the LPSP. Only when this search was exhausted did the Council seek to allocate greenfield sites on the edge of the settlement. The Hayle Harbour proposals (including the marine renewables business park) are a key element of the regeneration and development strategy for the town. The SADPD strategy supports the ongoing delivery of these proposals (in-line with LPSP Policy 2 Spatial Strategy, criteria 3.K.) whilst ensuring change is delivered sensitively respecting the context and setting of the World Heritage Site designation. The strategy also seeks to deliver the Trevassack urban extension within and beyond the current plan period to the south of the town up to the A30 road. This proposal will include new open space, community facilities and a new primary school. Employment allocations are proposed to the south of the town within the urban extension (in the latter part of the plan period) and adjacent to the St Erth A30 junction, which has good access to the strategic road network and the St Erth rail station and proposed Park & Ride facility.

Issues relating to individual sites

Note – The Programme and Agenda will identify further individual allocated sites for discussion according to the issues that arise in each case.

- d. Are the individual allocated sites and proposed land uses suitable, having regard to planning and environmental constraints?

Yes. There are no designated landscapes or environmental assets contained within the site allocations. The harbour proposals are in proximity to the estuary SSSI which has been a key consideration (within the harbour proposals) and all allocations are located within the immediate or wider setting of the WHS and Conservation Area. The Hayle Housing evidence document (D11.1) mapped and considered all environmental designations in identifying site options. The Heritage Evidence Base reports (D3.14/D3.10) set out the detailed heritage impact assessments that were undertaken in informing the selection and drafting of site allocation policies.

The SFRA within the evidence base (D4) has informed the site selection process and policy drafting of the allocations. Allocations H-UE1 Trevassack and H-E2 St Erth contain very small areas of Flood zones 2 and 3. No built development is proposed within any of these zones. Policy 26 of the Cornwall LPSP document ensures that development will need to implement an appropriate SUDS scheme that will ensure no adverse effects downstream. This requirement is also referenced in the GI strategy text at para 4.64. A document called the Shoreline Management Plan (which predicts sea level rise) has informed the strategy for Hayle, in particular in relation to the Causeway road west of the town which links to the St Erth A30 junction and in turn the options for a new access on the A30 linking with the Trevassack allocation H-UE1.

- i. Would the allocated employment site H-E2 give rise to unacceptable traffic that could not be accommodated on the highway network?

Transport modelling undertaken as part of the submitted evidence base (D11.4) demonstrated capacity on the strategic and local road network for the quantum of employment space (up to 12,000 sqm) proposed at St Erth H-E2. Highways England reviewed the transport modelling and were satisfied that the transport strategy would adequately deal with impacts on the strategic road network, along with capacity improvements proposed. The Council's Transportation Officers consider that access is possible, either from a remodelled roundabout junction off the A3074 Nut Lane, or from Mill Hill. Moreover there are sustainability benefits in locating employment space in proximity to the A30 junction; St Erth rail

station and the proposed St Erth Park & Ride facility, (plus in a wider west Cornwall context, it is also well located in relation to St Ives where there is a lack of medium and larger employment sites).

As set out in the Employment Evidence Base Report (D11.2) the final selection of employment locations are considered the most sustainable options for locating new employment space when considering environmental and flooding designations, deliverability, and while also prioritising the existing brownfield regeneration proposals at Hayle Harbour in the short and medium term.

- ii. Would the employment element of the allocated Trevassack urban extension H-UE1 give rise to unacceptable traffic that could not be accommodated on the highway network?

Transport modelling undertaken within the submitted evidence base (D11.4) assessed the quantum of employment floorspace (up to 24,000 sqm) proposed within the urban extension. This modelling showed capacity on the local and strategic highway network in relation to trips generated, along with capacity improvements proposed. The short and medium term priority for delivery of employment space in Hayle is at Hayle Harbour and at H-E2 St Erth, which will provide for LP:SP employment requirements in the short and medium term.

The employment element (within H-UE1) is not anticipated, or required, to come forward until the latter part of the plan period when access would be improved from a link road through the urban extension to Mellanear Road (to the west of the employment space). Furthermore the allocation states that "*employment uses should be higher quality focussing on office and lower density*" uses. Therefore vehicles accessing the employment area would typically not be larger vehicles associated with a more heavy industrial use site. Furthermore, providing this employment space within the confines of the A30 will help to reduce trips from Hayle residents.

Beyond the plan period and with a new access on to the A30, this would enable the Trevassack employment space to be fully built out. The site could deliver up to 24,000 sqm in the longer term (which is in excess of the residual employment requirement for the CNA), and early or medium term delivery of the site is not required to meet plan period employment requirements.

- e. Is there robust evidence that the allocated sites and infrastructure, including the future direction of growth H-D1if relevant, will be delivered at a sufficient rate and to a suitable timescale to ensure that the minimum numerical development requirements of the Town Strategy and of the adopted LPSP will be met, including with reference to the five year housing land supply required by national policy?

Hayle benefits from a relatively significant proportion of its housing target being completed (204) and permitted (849 (net)), as at 1/4/17; this represents 66% of the target.

As set out in answering the inspectors questions (INSP.S6) within (CC.S4) the Council provided updated statistics with regard to its housing supply position, which is set out in Table A(ii) within Appendix 4 of the Council's response (CC.S4.4). An extract of Table 1a, is set out below.

Area	Local Plan Target	Delivery Total		Delivery against Target	
		Gross	Net	Gross Delivery against Target	Net Delivery against Target
a	b	o	p	q	r
Hayle	1,600	2,339	1,909	146%	119%

This showed that the various sources of delivery (Completions / Permissions / Urban SHLAA / Windfall / CLI & Other / Allocations) could provide 2,339 dwellings (Gross) and 1,909 (Net) within the Plan period. This represents 119% (net) of the LPSP housing target.

In addition to these sources, the following considerations in relation to certain proposals, further demonstrate deliverability of Hayle's housing supply:

- A key element of the strategy is delivery of the proposals on Hayle Harbour. The site owner has undertaken extensive work in preparing reserved matters applications over the last year. Furthermore Cornwall Council has confirmed an interest in acquiring the North Quay site to support its delivery and there is also a funding bid to implement some of the highways infrastructure which will assist in unlocking the site.
- Developer interest in the north eastern part of the Trevassack H-UE1 allocation continues following the completed scheme PA15/03787 and permitted schemes including PA16/00501. The Council intends to actively work with the remaining land owners of the Trevassack site to bring forward a comprehensive proposal and help to accelerate delivery.

The above demonstrates that there is sufficient and deliverable identified supply of sites to ensure the LPSP housing target for Hayle is met.

It should be noted that H-D1 Barview future direction of growth is not required within the Plan period to contribute to the LP:SP housing

requirements to 2030. The site is anticipated to come forward after the current plan period.

In response to the inspectors questions INSP.S2, in CC.S3 and its appendices the Council set out the core infrastructure requirements necessary to support the growth within towns. In relation to Hayle this includes:

- **Transportation:** The strategy measures were based upon the Hayle Transport Evidence base (D11.4) that was prepared during the preparation of the SADPD. This resulted in various projects being identified which are set out in Table H3 of the SADPD. Appendix 1 of the Council's response to the inspectors questions (CC.S3.1) sets out the projects still to be delivered, together with their cost and estimated timescale for delivery, although these timescales can alter depending upon timing of delivery of sites and grant funding opportunities. For example the table sets out the project start dates and project completion dates for the Loggans and St Erth A30 junction capacity improvements. It also sets out dates for the other key junction improvements within the town. Furthermore, the One Public Transport System for Cornwall (OPTSC) project has commenced delivery on the key bus corridors in the west of the county between Penzance/St Ives
- **Education:** An evaluation of the demand for school places generated by the proposed growth within Hayle was undertaken jointly by the Council's Planning Service and its Education Service, summarised in paras 9.35 and 9.36 of the SADPD. These paragraphs also set out the proposed actions to address the shortfall. Appendix 3 of the Council's response to INSP.S2 (CC.S3.3) summarises the current position regarding capacity, the proposed schemes and their estimated costs; and the actions that have been undertaken to support their delivery. This shows that expansion is required at both existing schools in the short to medium term: Penpol primary was expanded by 30 places in 2017 by installing a modular classroom; feasibility is currently being progressed on expanding Bodriggy primary.
- **Open Space:** Each policy has the level of open space that should be provided and whether this should be in the form of on-site provision, or as an off-site contribution. As set out in answer to the Inspectors question INSP.S2 (Q10) in C.S3, on-site delivery of open space for allocations sites will be delivered via s106 agreements; whereas 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.

Funding to enable the delivery of necessary infrastructure will be secured from a range of sources:

- Developer Contributions – Site allocations are exempt from CIL, so will be secured through s106 agreements.
- Council sponsored funding bids – Cornwall Council has an excellent record of securing grant funding to support the delivery of infrastructure that will enable growth.
- Cornwall Council Investment Programme – Cornwall Council is developing an Investment Programme, which in part will support the delivery of key infrastructure. This Investment programme covers many different aspects, but does include investment in infrastructure. This will include the Council's traditional investment (e.g. investment without a return), as well as sometimes investing in infrastructure from which developers will pay some/all of the money back at a later date; in doing so enabling early delivery of critical infrastructure which will help ensure blockages to delivery are minimised.

The Council is currently putting in place an Investment Programme which is looking at both securing additional sites for housing and employment space, plus in the case of the latter it has various initiatives within the Investment Programme to support delivery of employment sites. Finally, the Council is also in discussions with the Government with regard to post-Brexit funding, to replace the EU funding that will be lost; this will also support economic initiatives, such as those set out in the SADPD for Hayle.