

1. Introduction

This Statement has been prepared by Savills on behalf of The Noy Family, landowners for all of the land at Treswithian Farm, Camborne, identified on the plan appended to previous representations submitted. The site forms part of a wider area of land identified within the Council's SHLAA, referred to as 'Camborne West (north of railway line)', site reference CPIR SO1.

The contents of this Position Statement supplement the representations previously submitted in July 2017, (Representation Number 91, The Noy Family (Savills), responding directly to the issues raised by the Inspector under Matter 4 of INSP.S4, specifically matters a – g.

a. Is the strategy for CPIR consistent with the LPSP?

We continue to have fundamental concerns with the Council's approach in relation to allocations and housing delivery in the Camborne-Pool-Illogan-Redruth area (CPIR). We have already expressed concerns through previous representations that the Council is aiming to simply meet the housing requirement for the area through the allocation of a single site, alongside allowances for a number of sites without planning permission, rather than providing for an additional allowance.

It is considered that the approach taken by the Council provides no flexibility should the single allocation at Tolgus (Policy CPIR-UE1), commitments or windfall sites fail to deliver at the time or delivery rates anticipated.

Indeed, adopted Local Plan Policy 2a confirms that the overall strategic housing requirement of 52,500 homes is a 'minimum'. The implication is that, should further suitable land be available, there is no reason to preclude further allocations on the basis that it would result in the delivery of a level of housing in excess of the adopted Local Plan policy. Such an approach is consistent with the spirit of the Local Plan and also the NPPF objectives to provide flexibility and to boost significantly the supply of housing.

Given this context, there is a clear logic to using the Site Allocations DPD to provide flexibility in delivery and identify additional sites for housing to provide added comfort that the required minimum will be achieved. The methodology adopted by the Council however effectively applies the Local Plan figure as a maximum, as opposed to a minimum. The effect of this is to preclude any additional allocations in the CPIR area despite the Council's own evidence confirming there are additional suitable and sustainable sites to accommodate development. Indeed, these appear to have been discounted on the basis of a prioritisation strategy in order to limit the delivery of housing to a 'maximum' housing requirement.

Whilst there is a requirement to deliver 5,200 dwellings over the plan period, relying on a single allocation, alongside existing commitments, to deliver the majority of this need would have significant risks to the delivery of housing to meet the needs of the area.

We have significant concerns over the emphasis placed on windfalls and consider it a much better approach to plan for additional allocations to increase certainty over delivery. In addition, whilst there appear to be commitments within the housing supply amounting to 2,813 dwellings, it is unlikely that all of these planning permissions will be implemented. As such, opportunities to maximise the delivery of housing within sustainable locations should be explored.

We are therefore concerned that the Council's approach of progressing with a delivery strategy which, at best, will only marginally deliver the housing requirement for the area, and does not provide for any additional buffer if certain sites do not deliver as projected, will impact on the delivery of housing to meet the needs of the area. The Council must make absolutely certain that sufficient land is allocated for development to meet the objectively assessed housing need, including a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5%.

Whilst the Local Plan has been adopted, and the strategic housing requirement for the plan period set, the Council must take this opportunity through the Site Allocations DPD to properly plan for the objectively assessed needs for Cornwall, and more specifically the CPIR area, and therefore allocate sufficient land through the Allocations DPD to significantly boost the supply of housing and ensure a supply of specific deliverable sites.

Development of the land at Treswithian Farm, on the western edge of Camborne, would add to the housing land supply pipeline on a highly suitable and sustainable site. Indeed, development to the west of Camborne could deliver residential dwellings in the short term alongside the other committed sites and the Tolgus Urban Extension, thus increasing the rate of housing delivery.

Furthermore, providing a choice of locations for house purchases at different locations in the area will offer purchasers the opportunity to meet their housing needs in the most sustainable and suitable location. A single allocation at Tolgus would not carry with it the same benefits.

b. Is the existing housing land supply situation based on robust evidence?

We do not agree that the existing housing land supply is based on robust evidence.

The Table on page 90 of the Site Allocations DPD indicates that there is a requirement to deliver 5,200 dwellings by 2030. As set out in our response above to matter a), the Council's planned housing land supply is reliant on only a single allocation to deliver 245 dwellings in the plan period, alongside existing commitments amounting to approximately half of the housing requirement (2,813 dwellings) and a windfall projection of 528 dwellings. Alongside completions amounting to 1,665 dwellings, this amounts to a supply of 5,251 dwellings against a requirement of 5,200 dwellings for the plan period.

The Council state within the Consultation Statement that *"these permissions and completions account for 87% of the target. The fact that there is only one housing allocations is as a result of this very healthy position. Therefore it is not considered that further allocations are required to deliver the housing target"*.

Regardless of the completions and commitments which form a substantial part of the Council housing supply, we are concerned that the planned supply is only very marginally in excess of the housing requirement of 5,200 set by the Local Plan. Planning to deliver in excess of 51 dwellings in our view allows for no flexibility should commitments or the single allocation fail to deliver at the anticipated rates.

As stated for matter a) above, we are concerned by the emphasis placed on windfalls and consider it a much better approach to plan for additional allocations to increase certainty over delivery.

In our view, the Council must take the through the Site Allocations DPD to properly plan for the objectively assessed needs for Cornwall, and more specifically the CPIR area, and therefore allocate sufficient land through the Allocations DPD to significantly boost the supply of housing and ensure a supply of specific deliverable sites.

c. Is the approach to the selection of sites for allocation consistent with the LPSP and appropriate?

The Land at Land at Treswithian Farm, Camborne, was identified within the background evidence for the Site Allocations DPD as suitable for development including within the Strategic Housing Land Availability Assessment, Camborne Pool Illogan & Redruth (CPIR) Housing Evidence Report, and Landscape Character Assessment.

It would appear from the available evidence that the Land at Treswithian Farm was discounted primarily due to a lack of developer involvement. It is strongly considered that such a lack of developer involvement in this site at this stage should not be the sole reason for allocating one site over another. The land at Treswithian Farm has been confirmed through the Council's evidence base as being a suitable and sustainable site, appropriate to accommodate a proportion of the housing requirement for the CPIR area, and as such it should be considered as an additional allocation to support the development of the Tolgus Urban Extension.

It is therefore difficult to see how the Council's site selection process has resulted in the Land at Tolgus (Policy CPIR-UE1) being prioritised and subsequently selected as the preferred location for development within the emerging plan over and above other suitable sites such as the land at Treswithian Farm, Camborne.

d. Is the existing housing land supply situation in CPIR based on robust evidence?

Please see our response to matter b) above.

f. Are the individual allocations and proposed land uses suitable, having regard to planning and environmental constraints, including air quality and the proximity of mineral development and safeguarded reserves?

Notwithstanding our concerns with the Council's approach to allocating only a single site in the CPIR area, there are some uncertainties relating to elements of the Tolgus Urban Extension (Policy CPIR-UE1).

Draft Policy CPIR-UE1 suggests that the delivery of the site is dependent on the capacity within the local sewage Treatment facility, otherwise an alternative facility will need to be provided prior to commencement of the scheme to ensure there is not a detrimental impact upon the Godrevy Head to St. Agnes SAC. Having reviewed the evidence, it is unclear what justification has been provided by the Council to confirm that this matter can be addressed. Any uncertainties over the delivery of the site due to required infrastructure may have an impact on delivery timescales.

Furthermore, the site abuts the World Heritage Site on its eastern boundary, which includes the Grade II* Sara's Foundry Town Mill and the Grade II Foundry House. The Council has prepared a Heritage Assessment to support the Site Allocations DPD, however this is the only available supporting evidence and there appears to be a lack of detailed assessment work to justify development in such close proximity to designated heritage assets.

The Council has already highlighted highway concerns through a pre-application response in relation to the development of part of this proposed allocation (ref: PA16/03521/PREAPP). The publically available response states *"the timing of the deliverability of this scheme given the works to the downgrading of highways have not yet been complete and this is crucial in accessing your site from Tolgus Road. In addition, development of your site would need to link back to the overarching master plan and would need to be seen in the context of this as opposed to isolation. I do however appreciate that you have intentions to move this site forward and there are in my view a couple of options. Firstly, wait for the highways to be complete and for the reserved matters application for the adjoin site to be granted. Another alternative is to put forward an outline planning application which includes access; this would however need to include the upgrade of the side road (Tolgus Road) in order to move your scheme forward"*.

Indeed, the Council's highways officer as part of the pre-application response stated *"Without connecting to the consented works, the development would not be acceptable due to the road network not being adequate and pedestrians would not be catered for"*.

Therefore, the site is reliant on the delivery of the adjacent committed site first which brings into question whether the timescales for the delivery of the allocation are dependent on infrastructure delivered on adjacent land.

As set out in our response to matter g), the uncertainties over the suitability of this site as well as the risks associated with delays in the delivery of the site suggest that the Council should be reviewing the need to provide additional allocations to ensure the soundness of the plan. For this reason the land at Treswithian Farm, Camborne should be considered as an additional allocation for the reasons set out under our response to matter g).

g. Is there robust evidence to demonstrate that allocations and infrastructure would be delivered at a sufficient rate and suitable timescale to meet the minimum numerical development requirements for the town, including with reference to the five year housing land supply required by the NPPF

As already expressed under our response to matters a) and b) we are concerned with the Council's approach to planned supply and delivery. Proposing only a marginal over delivery of 5,251 dwellings against a requirement for the CPIR area of 5,200 dwellings does not allow for any flexibility should commitments or the single allocation not deliver at the rates anticipated.

The Council's Five Year Supply Statement (August 2017) confirms itself that the proposed Tolgus Urban Extension (CPIR-UE1) will deliver 245 of the planned 280 dwellings within the plan period to 2030. Indeed, given the Council anticipate commitments on the site from 2023 onwards despite no planning application having been submitted and the site therefore not benefitting from a planning permission, we consider that a 2023 commencement is ambitious. The Council's own evidence indicates that the site may deliver 35 dwellings per annum, starting in 2023/24. This is considered to be ambitious in terms of both start date and delivery rate. However, even with this rate of delivery, the Tolgus Urban Extension will not deliver all 280 dwellings within the plan period. The Council's planned trajectory for this site does not allow for any delays in delivery which inevitably occur with such larger strategic allocations.

Furthermore, as set out in our response to matter f), the site is reliant on the delivery of the adjacent committed site first which brings into question whether the timescales for the delivery of the allocation are dependent on infrastructure delivered on adjacent land. No evidence has been presented to demonstrate the timing of the necessary infrastructure delivery in this location, and this brings into question the certainty of delivery.

Land at Treswithian Farm, Camborne

Any delays in the delivery of the Tolgus Urban Extension, or the planned commitments, will result in the Council not meeting the housing requirement for the CPIR area and therefore the Site Allocations DPD is not sound in this regard. The Council should therefore look to allocate additional sites to increase certainty over delivery.

Our previous representations submitted in July 2017 (Representation Number 91) set out our evidence for why the Land at Treswithian Farm is entirely suitable for development, and importantly how development on the western edge of Camborne would add to the housing land supply pipeline on a highly suitable and sustainable site. Given the concerns raised over the delivery trajectory for the Tolgus Urban Extension and existing commitments / windfall sites, it is strongly considered that the land at Treswithian Farm presents an opportunity to deliver residential dwellings in the short term alongside the other committed sites and the Tolgus urban extension, thus increasing the rate of housing delivery.

Furthermore, providing a choice of locations for house purchases at different locations in the area will offer purchasers the opportunity to meet their housing needs in the most sustainable and suitable location. A single allocation at Tolgus would not carry with it the same benefits.

The land has already been assessed through the Council's SHLAA (January 2016), under reference CPIR SO1 (Camborne West (north of railway line), which concluded that the site is suitable for development.

The Camborne Pool Illogan & Redruth (CPIR) Housing Evidence Report also confirmed the suitability of the land at Treswthian Farm (referred to as 'Camborne West (north of railway line)' in the document). The site scored highly within the various technical assessments undertaken, and was part of an original shortlist of ten urban extension options considered for allocation, eventually forming part of a final shortlist of five options. The site scored joint highest of any of the sites in relation to accessibility, including access to schools, healthcare, retail, employment, and open space.

However, whilst the site was part of a final shortlist of potential urban extensions within this Report, the Report does conclude, through a site prioritisation exercise, that only one site (Tolgus Urban Extension) should be allocated to meet the housing requirement for the area.

Notwithstanding our concerns over the need to allocate additional land, and not simply rely on one sole allocation for the CPIR area, it is significant that the Land at Treswthian Farm scored highly through the assessment criteria and the final prioritisation exercise. However, it appears that the main reason for the Council proposing to allocate the land at Tolgus is due to the site having already been masterplanned as part of a phase 2 to a permitted scheme, and the apparent lack of developer involvement on the alternative site options.

Whilst it is acknowledged that developer involvement does provide certainty on the deliverability of sites, developer interest should not be the sole reason for allocating one site over another. The land at Treswthian Farm has been confirmed through the Council's evidence base as being a suitable and sustainable site, appropriate to accommodate a proportion of the housing requirement for the CPIR area.

The Land at Treswthian Farm, is suitable, available and deliverable, there are no physical constraints that would preclude the development of the site, and there is no restriction to it contributing towards meeting the strategic housing needs for CPIR and Cornwall.

The site should therefore be considered for allocation within the emerging Site Allocations DPD.

Based on the Council's own evidence base, the site is entirely suitable for future development, and we consider the site is capable of accommodating approximately 460 dwellings. Furthermore, if a proportion of the overall site can be delivered within the Plan Period then this will greatly assist the Council in meeting the Local Plan housing requirement for the CPIR area.