

**Matter 4: Camborne-Pool-Illogan-Redruth (CPIR)  
Spatial Strategy and Allocations**

1.1 This matter statement has been prepared by Tetlow King Planning on behalf of Percy Williams & Sons Limited and Le Petit Felard Limited in relation to land interests at Tolgus and the proposed allocation CRIE-UE1.

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

1.2 The Cornwall Local Plan: Strategic Policies (LPSP) outlines the following targets for Camborne-Pool-Illogan-Redruth (CPIR):

- To develop 5,200 dwellings between 2010 and 2030;
- To deliver 80,833sqm of B1a office accommodation and 41,417sqm of new industrial space.

1.3 The purpose of the Cornwall Site Allocations Development Plan Document (DPD) is to outline how these housing and employment growth objectives can be delivered in a sustainable manner across the County. CPIR has a key role to play in delivering a minimum of 5,200 new homes as part of the County's minimum housing requirement of 52,500 new homes by 2030 (LP:SP Policy 2a).

1.4 LPSP Policy 2: Spatial Strategy identifies a specific objective for CPIR 'Supporting the economic regeneration of Camborne, Pool and Redruth'. These regeneration principles have been carried forward in the vision for CPIR identified in paragraph 5.4 of the Cornwall Site Allocations DPD:

***“For Camborne Pool Illogan & Redruth to come together to reestablish itself as Cornwall’s economic powerhouse.”***

1.5 In order to achieve this ambitious vision, the strategy recognises that a multifaceted approach should be adopted and paragraph 5.8 states:

***“The successful regeneration of CPIR will require a holistic approach, but future built development will play a critical role; from delivering higher design standards to new / enhanced services and facilities; and from improved employment opportunities to a reinvigorated retail offer.”***

1.6 Housing growth is key to facilitating regeneration and to this end land at Tolgus has been identified as phase two of the urban extension (CPIR-UE1). As paragraph 5.33 of the DPD identifies:

***“The allocation of the site will help to ensure a sustainable neighbourhood can be created, which will also support the delivery of an improved entrance to the town.”***

- 1.7 The delivery of the Tolgus urban extension has been a long-term objective of Cornwall Council as it provides the opportunity for housing and employment growth that will assist with the wider regeneration of Redruth. The development of the phase two site (CPIR-UE1) will further sustain the regeneration of Redruth through further housing and employment growth. The site's allocation is an integral part of the CPIR strategy and accords with the LPSP.

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

- 1.8 Please see response to question d.

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

- 1.9 The Tolgus urban extension is the only site allocation at CPIR. This is principally due to the site's delivery being a longstanding objective of Cornwall Council as it provides the opportunity for housing and employment growth that will assist with the wider regeneration of Redruth.
- 1.10 The concept of the Tolgus urban extension was first proposed in the draft Area Action Plan for Camborne, Pool Illogan Redruth (CPIR) which identified that the site had the development potential for 900 homes and 1,000 square metres of office space and 1,000 square metres of light industrial space.
- 1.11 The Tolgus phase one site has the benefit of planning permission (ref. PA12/09717). The first reserved matters application received approval in July 2016 (ref. PA16/04720) subsequent reserved matters applications for housing are expected to be submitted imminently. The development of phase two will further sustain the regeneration of Redruth through further housing and employment growth.
- 1.12 The CPIR Housing Evidence Report (May 2017) (Examination Document D8.1) sets out the site selection process for sites within the urban area and urban extension options for the CPIR settlements. The report assesses the potential sites against numerous criteria including environmental constraints, accessibility to services and potential benefits. The Site Prioritisation table on Page 38 of the Housing Evidence Report, reproduced below, confirms that Tolgus scores the best compared to the other potential urban extension sites.

	Treswithian Nth / Sth	Killivose	Tolgus	Park Bottom	Tolvaddon
Climate Factors	+	+	+	-	-
Waste	+/-	+/-	+/-	+/-	+/-
Minerals & Geodiversity	+	+	+/-	++/-	+
Soil	--	--	--/+	-	--
Air	--/+	-	-	++/-	+/-
Water	+/-	+/-	+/-	+/-	+/-
Biodiversity	+	+	+	+	+
Landscape	+	+/-	+	+	+
Maritime	0	0	0	0	0
Historic Environment	-	-	--/+	-	-
Design	+	+	+	+	+
Social Inclusion	+	+	+	+/-	+
Crime & Anti-social Behaviour	?	?	?	?	?
Housing	+	+	+	+	+
Health, Sport & Recreation	+	+	+	+	+
Econ Dev, Regeneration & Tourism	+	+	+	-	+
Education & Skills	+	+	--/+	+	++/-
Transport & Accessibility	+	+	+	+/-	+/-
Energy	++/-	++/-	+	-	+/-

1.13 The CPIR Housing Evidence Report (Examination Document D8.1) then considers the deliverability of the sites and establishes that Tolgus is the only site with developer interest and therefore is the only site that has a realistic prospect of delivery:

***“Tolgus – Site has been masterplanned, as part a phase 2 of a permitted scheme; landowners for part of the land are known to have been activity marketing the site for sale” (sic) (Page 38)***

1.14 The CPIR Housing Evidence Report (Examination Document D8.1) then goes on to confirm that Tolgus is the only site to be including in the Cornwall Site Allocation DPD (Page 38):

***“Tolgus (remaining part of site not already permitted) – 280 dwellings***

- ***The site represented one of the best performing options when reviewed through the Sustainability Appraisal criteria.***
- ***Prioritisation of this site will enable the remainder of a well located masterplan site to come forward; in turn this will support a scale of development that will support it as a sustainable neighbourhood.***
- ***Finally, the key concern previously was the barrier created by the adjacent ‘bypass’; however the adjacent permitted development (and grant funding) is addressing this issue.”***

- 1.15 The Tolgus urban extension also scores well in the Sustainability Appraisal (March 2017) (Examination Document D5). Similar to the Housing Evidence Paper’s site prioritisation scoring, see above, Tolgus scores well against most criteria with only negative scores relating to air quality, education and skills and historic environment. However, the Sustainability Appraisal concludes that the site has potential to mitigate any negative impacts from these factors.
- 1.16 To conclude, the Council has demonstrated a robust approach to site selection through its evidence base documents and is therefore consistent with the LPSP. Furthermore, it meets the test of soundness in that it is positively prepared, justified, effective and consistent with national policy.

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

- 1.17 The Housing Implementation Strategy (Examination Document E7) sets out how the CPIR minimum housing requirement of 5,200 new homes will be met through the established housing supply, reproduced below. 86% of the housing target has already been accounted for through net completions or extant planning permissions. The remaining 14% will be met via proposed allocations, additional urban capacity sites and windfall sites. However, it is important to note that 5,200 new homes is a minimum housing requirement as set out by LP:SP Policy 2a and therefore it is not a cap on development.

<b>CPIR</b>	
Local Plan Housing Target	5200
Completions 2010-2017	1665
Planning permission < 10 units (10% discount)	375
Planning permission 10+ units	2438
Windfall on small sites (2022-2030)	528
Proposed Local Plan Site Allocations	245
Surplus	51

- 1.18 However, we observed that the above figures are different to the figures contained in Table CPIR2 in the Site Allocation DPD and CPIR Housing Evidence Report (Examination Document D8.1). We presume that the Housing Implementation Strategy (Examination Document E7) represents the most up-to-date figures but refer to both as Table CPIR2 appears in the Cornwall Site Allocations DPD.

<b>Table CPIR2: CPIR – Delivery against Housing Target</b>	
<b>Target</b>	<b>5,200</b>
Net completions (Apr-10 to Apr-16)	1,412
Net Extant permissions (at Apr-16)	2,862
Net windfall projection	594
Net additional urban capacity	273
<b>Residual target to be delivered by allocations</b>	<b>59</b>

- 1.19 Examining Table CPIR2, the residual target to be delivered by allocations of just 59 new homes seems exceptionally low especially when the Tolgus allocation is proposed to deliver approximately 280 new dwellings. However, this figure would appear to have been superseded by the Housing Implementation Strategy table, provided above, although this is still 35 units short of the full allocation capacity.
- 1.20 As previously mentioned the housing requirement is not a cap on development and the NPPF encourages local planning authorities to boost significantly the supply of housing (paragraph 47). Therefore, the housing supply should exceed the 5,200 dwellings figure and include a contingency allowance in order to ensure a flexible housing land supply.
- 1.21 The CPIR Housing Evidence Report (May 2017) provides the background to the housing figures. Table 3 provides a summary of CPIR Urban Capacity and illustrates how the figures in Table CPIR have been devised. Firstly, we note that the Gross Total for c) Net Extant planning permissions- 10 or more has been incorrectly stated as 129 but it should be 2,588 as per the Net Total. Secondly, whilst we welcome the inclusion of a discount rate for 10% for the sites with extant planning permissions under 10 units it is unclear why no discount rate has been applied to the extant planning permissions on sites of 10 or more units. We believe a commensurate discount rate of 10% should also be applied to the sites over 10 units as it is not realistic to assume that all the extant planning permissions will be implemented.
- 1.22 The 30% discount applied to Urban SHLAA sites seems reasonable as there is no certainty in these sites delivering the estimated site capacities. The Council also needs to be satisfied that sites meet the deliverability tests as set out in NPPF paragraph 47 to ensure the sites are available, suitable and achievable. The density assumptions also need to be reflective of the site constraints and compatibility with its surroundings.
- 1.23 To summarise, we therefore recommend that a main modification be made to Table CPIR2 so that the residual target to be delivered by allocations is at least 280 dwellings and that these figures be expressed as minimums as the housing requirement is not a cap on development and in accordance with NPPF the Council's housing supply needs to be flexible and responsive to change. The table below outlines our suggestion which updates Table CPIR based on the more up-to-date figures contained in the Housing Implementation Strategy (Examination Document

E7). A further 10% discount has been applied to the planning permission to the 'planning permission 10+ units' figure (i.e. 2438 reduced to 2194).

<b>Table CPIR2: CPIR – Delivery against Minimum Housing Requirements</b>	
<b>Minimum Housing Requirements for CPIR</b>	<b>5,200</b>
Net completions (Apr-10 to Apr-17)	1,665
Net Extant permissions (at Apr-17)	2569
Net windfall projection	528
Net additional urban capacity	273
<b>Residual target to be delivered by allocations</b>	<b>280</b>

**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?**

- 1.24 As the Housing Evidence report confirms, the Tolgus urban extension is the most appropriate site for an urban extension as it is geographically the closest to a town centre whereas the other options are in more peripheral locations. Its development connects the school to the town through the provision of new footpath and cycleways. Access to Redruth town centre is via Chapel Street a major regeneration initiative known as the 'Redruth corridor' and together with the intervening highway works the two developments complement each other.
- 1.25 The Sustainability Appraisal (Examination Document D5) has influenced the site selection process and recognises the sustainability credentials of the Tolgus urban extension. The site scores positively against most criteria and any negative scores could be rectified through mitigation measures as Table CPIR2 (Exam Document: D5.4) confirms:

***“The site represented one of the best performing options when assessed against the Sustainability Appraisal criteria; including good accessibility to services and facilities; more limited landscape impact etc. Prioritisation of this site will enable the remainder of a well located masterplan site to come forward; in turn this will support a scale of development that will support it as a new sustainable neighbourhood of Redruth The key concern previously was the barrier created by the adjacent ‘bypass’; however the adjacent permitted development (and grant funding) is addressing this issue. The site, together with the permitted scheme adjacent to it, will help to create an improved entrance to the town. It is recognised that the site could have a minor impact on surrounding heritage assets, but topography and the proposed mitigation means the impact on the World Heritage Site, including the Sara’s Foundry Complex are limited. As a result, on balance it is felt that the potential negative impacts of the development are outweighed by the benefits highlighted above, as well as the delivery of much needed housing, including affordable housing, for the CPIR area.”***

- 1.26 A key part of unlocking the Tolgus urban extension was removing the barrier of the bypass. To facilitate the highway works of downgrading the A3047 between the Tolgus Place Roundabout and Blowinghouse Roundabout a £1.6m Highway contribution towards Highway works was secured via the Unilateral undertaking. These works are now complete so the perceived 'barrier' has now been removed and the site can be developed.
- 1.27 Indeed, the Tolgus urban extension is the only site allocation for CPIR and this is a reflection of it being the only site that can deliver growth in a sustainable manner without any adverse environmental effects. The other sites were discounted as being unsuitable and/or unavailable in the CPIR Housing Evidence Report (March 2017) (Examination Document D8.1). Therefore, the Tolgus urban extension is the only deliverable site.
- 1.28 With regards to Air Quality, it is acknowledged that the site score negatively against this criteria on the basis that the site falls within the Camborne Pool Redruth Air Quality Management Area. The Sustainability Appraisal suggests the proposed mitigation measures and considerations (Exam Document: D5.4, Section 5.1):
- “The extent of air pollution resulting from the proposal can be minimised through careful design and construction and the implementation of sustainable transport networks. Higher level policy provisions seek to meet this objective through Local Plan policies 12 and 13 (Design and Development standards), and which seek to secure high quality safe, sustainable and inclusive design and development standards. These policies require development to demonstrate the application of the guidance set out within the Council’s Design Guide Supplementary Development Document.”***
- 1.29 Air Quality was considered in the Environmental Statement accompanying the phase one planning application. To address concerns about potential air quality impacts the unilateral undertaking includes an air quality and traffic modelling contribution.
- 1.30 With regards to minerals safeguarding, as the Inspector is aware we have submitted representations and attended the recent examination for the Mineral Safeguarding Development Plan Document. Our prime concern is that the two development plans have been prepared in isolation as the proposed 250m buffer zone will significantly encroach into the allocation CRIE-UE1, in particular the area of land owned by our clients.
- 1.31 What is more, the rationale justifying the 500% increase in safeguarding around secondary shafts from 50m to 250m has not been justified by any evidence base.
- 1.32 Moreover, the Tolgus phase one development was considered on the basis that the safeguarding area was 50m, which was able to be accommodated in the planning application (ref. PA12/09717) and the wider masterplan which includes phase two. Therefore, the emerging Mineral Safeguarding DPD appears to be in conflict with the

Tolgus urban extension proposals which has been a long-standing objective of Cornwall Council since its inception in CPIR draft area action plan (2009).

- 1.33 To conclude, the Council's evidence base is robust and justifies the allocation of the Tolgus urban extension phase two CPIR-UE1 and meets the test of soundness.

**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?**

- 1.34 In addition to owning land within CPIR-UE1, our clients are the landowners for the Tolgus phase one site. Planning permission PA12/09717 was a hybrid planning permission which included detailed highway works which needed to be implemented before the rest of the development, which was subject to outline planning permission, could commence. Now that the Highway works are substantially complete the reserved matters applications will be submitted for the residential and commercial phases.
- 1.35 Whilst the Highway works have been taking place the landowners have undertaken various remedial works including the structural mining remediation works, archaeological and contamination investigations and managing invasive species. All of which will facilitate a prompt delivery of the site following the submission of reserved matters applications for housing.
- 1.36 We agree with the Council's housing trajectory (Examination Document E7.2) that the site can start delivering housing in 2019/20 which allows sufficient time for the approval of reserved matters applications and discharge of conditions. We agree with the assumptions that the site can deliver up to 70 homes per year on the basis that more than one housebuilder will be delivering housing on site.
- 1.37 With regards to allocation CPIR-UE1, the housing trajectory (E7.1) indicates that the site is not expected to deliver new homes until 2023/24 and is predicted to deliver 35 units a year which takes the development beyond the plan period by one year to 2031. Our clients' land represents a smaller parcel of the phase two land, approximately 1.8ha which has the capacity to deliver in the region of 70 units. We believe that site could start delivering sooner than 2023/24 and it is our intention to submit a planning application in the immediate future.
- 1.38 Reviewing the Council's housing trajectories (Examination Documents E7.1 and E7.2), there appears to be sufficient sites with planning permissions in the pipeline to give the Council a five-year housing land supply. The housing land supply is currently formally confirmed as being 6.2 years in Cornwall (5 Housing Land Supply Statement) (Examination Document E6.5). Phase One of the Tolgus urban extension is an integral part of the five year housing land supply as it is projected to deliver 175 dwellings in years three to five. Our clients' site within CPIR-UE1 also has the

potential to start delivering as part of the five year housing land supply potentially 2021/22.

- 1.39 To conclude, the Council's evidence base appears to demonstrate that it has a comfortable five year housing land supply with sufficient planning permissions and land allocated for future development. The CPIR section of the Cornwall Site Allocations DPD is therefore robust and accords with the test of soundness.

Prepared by Tetlow King Planning  
1 February 2018

*Word count: 2918*