



INSP.S4 Matter 4 Camborne-Pool-Illogan- Redruth (CPIR) Spatial Strategy & Allocations

Cornwall Council Position Statement

02 February 2018

a. Is the strategy for CPIR 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 CPIR, 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	Comments
<p>Objective 1 – Employment Enable higher quality employment opportunities by sustaining and enhancing the area’s role as one of Cornwall’s primary employment hubs</p>	<p>4 strategic employment sites have been safeguarded through the SADPD; plus it allocates three further sites that will significantly increase the quantum of employment space in CPIR, in doing so creating a ‘hub’ of employment activity in the centre of Pool (CPIR-E5 and CPIR-E7)</p>
<p>Objective 2 – Housing Deliver housing growth that will help facilitate the area’s economic aspirations, whilst also delivering much needed affordable housing for local residents</p>	<p>The SADPD only has to identify one site to ensure the LPSP housing target can be achieved, due to the permissions and completions that are already in place</p>
<p>Objective 3 – Retail Enhance the community network area’s retail offer, providing different but complementary roles for Camborne, Pool and Redruth, strengthening comparison shopping in particular</p>	<p>The SADPD has allocated one site in Redruth (this represents the best option within the town centre to support the retail provision and support other aspirations for the town). The strategy text also highlights the importance of supporting the various retail centres within CPIR</p>
<p>Objective 4 – Education Consolidate and enhance the community network area’s education opportunities, including Cornwall College.</p>	<p>The SADPD includes a section on future education provision (paras 5.35 and 5.36) to ensure appropriate capacity is provided to support the targeted housing growth</p>
<p>Objective 5 – Regeneration Reduce deprivation and support regeneration and growth through allocation of land for services, provision of infrastructure (including open space and enhanced sports and leisure facilities) and through high quality design.</p>	<p>The SADPD strategy sets out the aspiration to continue the regeneration of CPIR, and this has been one of the factors in selecting appropriate sites to enable the housing and economic growth. The GI Strategy sets out requirements in relation to the delivery of open space provision, including sports facilities (Table CPIR4)</p>
<p>Objective 6 – Transport Infrastructure Deliver the highway and sustainable transport infrastructure needed to support the delivery of the area’s</p>	<p>The SADPD includes a section on CPIR’s Transportation Strategy, which includes measures to improve sustainable transport measures. It should be noted that that East-West Link Road is now</p>

regeneration – including the east-west link road and improved access into Redruth town centre	complete, plus the works to deliver improved access into Redruth is on site
Objective 7 – Contaminated Land Continue remediation of the area’s contaminated land, in doing so regenerating underused or derelict sites for housing, leisure and employment uses.	The prioritisation on brownfield land within the existing urban area for allocations supports this objective
Objective 8 – Environment For CPIR to be renowned as a destination for cultural and heritage related tourism; in doing so acting as the hub for experiencing the World Heritage Site. Maintain the separate identities of Camborne, Pool, Illogan and Redruth, whilst utilising their collective strength.	SADPD para 5.9 discusses the importance of the WHS and the area’s historic assets. Furthermore, one of the reasons for selecting to allocate land surrounding Heartlands (one of the area’s main heritage attractions) is to support its future success by bringing more people to live/work/visit the area

Other statements within the Cornwall Local Plan Community Network Area section for CPIR, which are supported by the SADPD include Para’s:

- 5.4.....Pool should deliver employment space and strategic services and facilities that the whole of the CPIR area would seek to benefit from
- 5.5.....underused or derelict brownfield resources are being prioritised for development, such as Tuckingmill, Boilerworks and Dolcoath
- 5.6.....priority should be given to the existing brownfield assets; however greenfield development may be required to support delivery of housing and economic growth particularly in the later stages of the plan period
- 5.7.....Opportunities to deliver office development should be prioritised to the town centres; where this is not possible, Pool represents CPIR’s primary opportunity
- 5.10.....Improved academic and healthcare services
- 5.10.....Enhancement and promotion of sustainable transport options

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

Yes. Updated information (as at 1/4/17) was provided and summarised within the response to the Inspectors’ questions (INSP.S6) – set out in the Council’s response CC.S4 and detailed in CC.S4.4.

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

The SADPD has prioritised the delivery of sites within the existing urban area, with Tolgus urban Extension (Phase 2) the only allocation without planning permission on greenfield land; this approach is in line with Policy 21 of the LPSP document, as well as para 5.5 and 5.6 of the Cornwall Local Plan Community Network Area document.

The SADPD has also prioritised and allocated sites within Pool to support CPIR's economic ambitions/targets, this is in line with the statements set out within para 5.7 of the Cornwall Local Plan Community Network Area document "*Opportunities to deliver office development should be prioritised to the town centres; where this is not possible, Pool represents CPIR's primary opportunity*", as well as Policy 2(j), Policy 5 and Policy 21(b) of the LPSP document.

The retail allocation (Fair Meadow – CPIR-R1) is located within the town centre (as set out within the Cornwall Local Plan CNA document); plus it is in line with national policy, as well as Policy 4 of the LPSP document.

Finally, the sites safeguarded as strategically important employment are in line with Policy 5 of the LPSP document (including the policy's final bullet point); with each of the safeguarded sites of at least 5ha in size, in line with the LPSP.

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

Yes, as set out in answering question b.

- e. How will the focus on brownfield redevelopment in CPIR affect the delivery of affordable housing in line with LPSP Policy 8?

Firstly, the SADPD does not seek to allocate any land for housing within the existing urban area. The reason for this is because all of the larger urban sites, identified through the CPIR housing evidence document (D8.1), already have permission. The focus of the wider strategy on the delivery of these urban sites supports the LPSP policy 21 (a/b) regarding the encouragement of proposals on previously developed land, use of despoiled, degraded, derelict and contaminated land; etc. Furthermore, this approach supports the LPSP CNA objective 5 regarding the regeneration of CPIR and particularly objective 7 regarding the reuse of derelict or under used sites.

The CPIR area is characterised by the remnants of the areas previous mining related activity; there are various urban sites that have the clear scars of this previous activity, but land on the edge of the settlement can equally have mining features that will impact upon development viability. However, urban brownfield sites usually benefit from easy connection to services, as opposed to some greenfield locations (supporting LPSP policy 21). Furthermore, the Council's focus on brownfield sites also offers another significant benefit relating to the area's regeneration activity by bringing back into use these underutilised / disused sites (LPSP Policy 21). Moreover these sites are often in more sustainable locations to access services and facilities, as well as supporting use of sustainable transport measures. Finally, all of the large brownfield regeneration sites already benefit from planning permissions and in most cases are already on site. With the support

of the Council or other government funding, these larger urban sites are delivering levels of affordable housing that are generally compliant with the LPSP policies.

- 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?

When identifying sites to be allocated, various assessments were undertaken, this is summarised within the CPIR Housing and Employment evidence base reports (refs. D8.1 & D8.2). Furthermore, the Habitat Regulations Assessment (D2), SFRA (D4), Heritage Impact Assessment (D3), all concluded that the sites were appropriate to be allocated; which is summarised within the Sustainability Appraisal (D5) that was prepared.

The Tolgus Urban Extension (CPIR-H1) is within a Mineral Safeguarding area, however this would not prevent a scheme coming forward, as the safeguarding area only relates to retaining the ability to use the New Tolgus Shaft for ventilation. To provide clarity on the matter, the Council is proposing the following wording to be added to the policy (set out in the Schedule of Proposed Modifications on the Council's website):

'i) Consideration should be given to the Minerals Safeguarding Area in relation to the New Tolgus Shaft; however this will not preclude delivery of the scheme. Proposals should refer to the Minerals Safeguarding DPD'

Similar wording is being added to the Cornwall Minerals Safeguarding DPD, to also highlight that the designation would not preclude the site allocation from coming forward. Furthermore, a precedent has already been set, with the permission for 380 dwellings (PA12/09717), adjacent to CPIR-H1; with this permission being located closer to the shaft that the safeguarding area relates to.

The whole of the CPIR area is designated an air quality management area, so it would not be possible to deliver the LPSP's targeted growth for the area, without locating new development within the AQMA. However, the SADPD CPIR Transportation strategy sets out various measures to ensure the highway network works efficiently; with many of the most strategic measures already implemented (e.g. East Hill Junction Improvements; East West Link Road; A30 junction upgrades, etc), which helps to reduce congestion and in turn problems associated with air quality. Furthermore, the Transportation Strategy is seeking to deliver various sustainable transport measures to promote modal shift from the private car, all of the measures will support the continued management of air quality within CPIR. Finally, with the prioritisation of urban sites, it maximises the opportunity for people to use sustainable means of transport, which again supports the management of air quality in the area.

- 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

The housing trajectory for CPIR is set out within the response to the Inspectors' questions (INSP.S6) – set out in the Council's response CC.S4 and detailed in CC.S4.4. This shows that the CPIR area already benefits from a significant proportion of its housing target either being completed (1,665) or permitted (2,813 (net)), as at 1/4/17; this represents 86% of the target. Almost all of the permitted larger sites are already on site delivering housing completions. The wider Tolgus Urban Extension area (comprising both the permitted scheme (PA12/09717) and the Allocations (CPIR-H1)) are dependent upon the improvement of the A3047 adjacent to the site (referred to as 'RSEGP (including Tolgus Gateway)' within Table CPIR3 of the SADPD). These highway improvements are now on site and will be completed in 2018, which will enable the two housing schemes to come forward.

The Council has recently acquired the allocation CPIR-E1 to support its delivery. Furthermore, the Council has also recently secured Enterprise Zone status for the site. Moreover, 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 CPIR.

All major highway works required to enable the LPSP housing and commercial growth to come forward are already in place (e.g. East West Link Road, upgrade to East Hill Junction, and upgrades to the three A30 junctions). The delivery of the East West Link Road opens up the ability to bring forward the CPIR-E5 allocation, as well as provide access to the CPIR-ED1 allocation. The Council has undertaken significant work to develop the One Public Transport System for Cornwall project (OPTSC); over £50m of funding has been secured for the initial phases, which includes improved bus services to and from CPIR; better waiting facilities; RTPI; Contactless payment; etc. Implementation of a half hourly train service throughout Cornwall will also be implemented in 2018. Furthermore, the Council has completed feasibility work that identifies a network of routes across CPIR, linking key employment, housing, retail and education sites. Various improvements to ped/cycle routes have already been implemented, plus further improvements are planned.

The expansion of Rosemellin School is currently being undertaken, whilst additional accommodation has also been created at Treloweth School.

The delivery of a new 5ha park within the centre of CPIR, Heartlands, has been implemented, which forms a key component of the public open space provision for the Pool area. Furthermore, a strategic SUDS scheme running north-south through the Pool area has also been implemented, which enables various development to 'plug into', including the Station Road allocation (CPIR-E5).