

## Falmouth Marine School Position Statement

The following Position Statement is set out in three sections:

1. Original Allocations DPD submission
2. Response to Cornwall County Council DPD Statement
3. Continued engagement with Cornwall Council and Falmouth Town Council since the original submission.

### 1. Original Allocations DPD submission

- a. Firstly, we would like to state that the Allocations DPD submission is still relevant, and factually correct. The proposed development for the Marine school is to create additional teaching space with new workshops all to meet the forecast growth of the Marine School. Included in the proposal is student accommodation which will provide much needed purpose designed accommodation but also provide funds to assist the viability and cost of the new teaching facilities.
- b. Forecast growth for Falmouth Marine School remains as per the submitted table.

Academic Year <sup>2</sup>	2016/17 <sup>3</sup>	2017/18	2018/19 <sup>1</sup>	2019/2020	2020/21
Higher Education & Higher Apprenticeships	117	130	175	175	175
Further Education	146	150	160	160	160
Work based learners and full cost recovery	55	100	150	200	200

<sup>1</sup> Assumes planned development available from 18/19 Academic Year

<sup>2</sup> Either taught directly at FMS or by FMS staff at partner organisations / employers

<sup>3</sup> Actuals 16/17

### 2. Response to Cornwall County Council DPD Statement

- a. Secondly, we would like to respond to the Cornwall County Council response to submission 166 (Appendix A).
  - i. *“On the basis that the Council has, following two public consultations, set out a strategy to deliver sites for PBSA to meet the scale of growth identified by the Universities; and as set out above, the Council does not accept that the alternate site put forward within this representation – **Falmouth Coachworks, Falmouth.**”* We note that the response refers to the incorrect site, noting *Falmouth Coachworks* as opposed to Killigrew Street and Wellington Terrace. This statement also refers to the universities, and not Falmouth Marine School, which is independent from the universities.
  - ii. CCC notes that: *“The additional requirements of the Falmouth Marine school set out within the representation are noted as changes to student numbers (growth) at the campus within Falmouth.”* This suggests that the Falmouth Marine School student numbers are being included with those from Falmouth University. This is not a fair reflection of the Falmouth Student population and therefore the current strategy for PBSA is not accurate.
  - iii. The Council notes; *“within the DPD at para 7.50 that the emerging Falmouth neighbourhood plan will seek to include policies to manage other future student related development within the town (separate from the Councils strategic sites set out within the DPD).”* Therefore we have liaised with Falmouth Town Council to include the FMS requirements in the emerging Neighbourhood Plan. We have further elaborated on this under item 3.2.
  - iv. When referring to student growth for Falmouth University and the University of Exeter the councils position statement is: *“The DPD is prepared in line with the requirements set out at Policy 2a of the Cornwall Local Plan, which requires the provision of purpose built student accommodation (PBSA ) commensurate with the scale of any agreed expansion of student numbers at the Penryn campus, taking into consideration any changes in student numbers within other campuses at the universities in Falmouth and Penryn.”* We would suggest that the same principles are applied to the expansion of Falmouth Marine School and recognised within the document. The requirement is set out in the original Application and defined under item 3.2 below.

- v. CCC closing statement notes: *“Further, the Council contends that such urban brownfield sites would be better utilised to provide for future wider housing and employment generating development to contribute towards the urban capacity, rather than form any part of the Councils student accommodation strategy.”* Both sites are currently owned by Educational institutions and would not be released for wider housing development. Therefore their usage for PBSA would be in line with the current strategic thinking applied to the universities, to develop on their own campuses, instead of using other brownfield sites, which may be suitable for housing. Furthermore the development of these sites owned by Falmouth Marine School and Falmouth University, would indeed provide additional employment opportunities for the town.

**3. Continued engagement with Cornwall Council and Falmouth Town Council since the original submission.**

- a. Third and finally, we would like to highlight our continued engagement and consultation with Falmouth Town Council and Cornwall Council in adopting these sites for PBSA and educational usages.
  - i. Falmouth Marine School have presented initial proposals to Falmouth Town Council and are pursuing the inclusion within the Neighbourhood Plan. The following statement has been provided by FMS to Falmouth Town Council for inclusion within the emerging Neighbourhood Plan.
    1. It may be noteworthy that although we are the oldest educational establishment operating in Falmouth, unfortunately the FMS specific student accommodation needs were not considered in the DPD allocation
    2. Our student mix using the accommodation is distinct from the two neighbouring HEI's – we have more mature students, often attending by block release as they are employed – for example crew on superyachts seeking to become deck officers undertaking HE by block release.
    3. The site would be managed by Falmouth University alongside their own proposed co-development in Wellington Terrace generating economies of scale and consistent security for both sites.
    4. As there will be no onsite student parking there is an opportunity to look at a permit system with the Quarry Car park or similar with Cornwall Council.
    5. The development has been deliberately designed by APG at our request as the client to a domestic scale and form brief which blends the contemporary school with the local vernacular. Specific care has been given in the design to prevent overlooking and over shadowing.
    6. The proposed development will allow us to restore our workshop space to levels prior to our last redevelopment in 2013 when the teaching facilities were modernised for the first time in 30+ years and the quality of the exterior of the building was significantly improved ( E.g. new external cladding) but funds were too limited to maintain the same applied teaching footprint. This restoration of lost workshop and laboratory space will enhance our offer and allow the School to grow but is dependent upon the associated PBSA.
- b. **Community consultation will be held at Falmouth Marine School prior to the hearing on 13th March 2018.**
- c. **A formal Pre-Application submission will be completed after the hearing on the 13th March.**

## **Appendix A Cornwall County Council response to Allocation DPD item 166.**

*The additional requirements of the Falmouth Marine school set out within the representation are noted as changes to student numbers (growth) at the campus within Falmouth.*

*The DPD is prepared in line with the requirements set out at Policy 2a of the Cornwall Local Plan, which requires the provision of purpose built student accommodation (PBSA ) commensurate with the scale of any agreed expansion of student numbers at the Penryn campus, taking into consideration any changes in student numbers within other campuses at the universities in Falmouth and Penryn. The Council is satisfied therefore that on the basis of the level of*

*growth set out within the joint application from the two Universities setting out their growth requirements (PA16/03323) and with consideration to any respective changes within other campuses within Falmouth and Penryn, that the strategy set out within the DPD has properly considered the amount of land required to meet the needs generated from the scale of expansion of student numbers at the Penryn campus, having regard to the changes in numbers at other campuses within the towns.*

*The previous inclusion within the Preferred Options consultation of the DPD (3 Oct- 14 Nov 2016) of a number of urban sites identified as 'options' that could potentially deliver more than the required amount of accommodation to address the amount of growth set out by the Universities. That version of the DPD was very clear that the inclusion of a number of options was to consult with the community and other stakeholders on the suitability of all of these sites, either alone or in combination with others to meet the need for PBSA within the area. This was quite clearly set out at paras 7.40 – 7.49, and with para 7.48 explicitly expressing that the Council was seeking feedback from the consultation on each of the identified urban site options to establish which should be allocated. None of these urban site options were ever identified as specific allocations. The responses to that 2016 consultation on those options gave rise to substantial objections from large numbers within the local communities based on the loss of urban brownfield sites for housing or employment, as well as intensifying the proportions of student occupancy within the towns in a number of locations, and the potential for adverse impacts arising from inter-relationships between existing business uses / important economic centres such as Falmouth Docks, through the introduction of sensitive uses adjacent to such noise generating activities. Of all of the site options identified, the overwhelming preference directed any additional PBSA proposals to the option sites identified at or adjoining the Penryn campus rather than within the urban area of the towns. The Council took the view based upon the outcome of that consultation that an alternate approach to providing for student accommodation was necessary, and which resulted in all of the options consultation student sites being dropped for a different strategy approach, as is now set out within the DPD.*

*The provision of advice on pre-application enquiries which the Council provides on a without prejudice basis, whilst material, should not be an overriding factor in preparing a planning policy position. This is especially the case in the absence of due consideration or any formal decision that the Council might take on any such proposals, on balance, having had due regard to all wider material considerations on such proposals. It would not be unusual for the Council to generally encourage the appropriate re-use of previously developed land within the urban area, as this would be supported by both the guidance set out within the NPPF, and also policy 21 of the Cornwall Local Plan, and can contribute to wider windfall and infill type developments for the urban capacities for each town.*

*The Council notes within the DPD at para 7.50 that the emerging Falmouth neighbourhood plan will seek to include policies to manage other future student related development within the town (separate from the Councils strategic sites set out within the DPD).*

*On the basis that the Council has, following two public consultations, set out a strategy to deliver sites for PBSA to meet the scale of growth identified by the Universities; and as set out above, the Council does not accept that the alternate site put forward within this representation – **Falmouth Coachworks**, Falmouth. Further, the Council contends that such urban brownfield sites would be better utilised to provide for future wider housing and employment generating development to contribute towards the urban capacity, rather than form any part of the Councils student accommodation strategy.*

*The Council does not consider it necessary or appropriate to make any proposed modifications as a result of this comment."*