



# Position Statement on behalf of Wainhomes (South West) Holdings Ltd (ID: 192)

In relation to: Matter 6 – Falmouth & Penryn Spatial  
Strategy and Allocations

Wainhomes (South West) Holdings Ltd

Project : 6412  
Hearing : Matter 6 – Falmouth &  
Penryn  
Client : Wainhomes (South West)  
Holdings Ltd  
Date : February 2018  
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## **1. Introduction**

- 1.1 Emery Planning is instructed by Wainhomes (South West) Holdings Ltd (hereafter referred to as 'Wainhomes') to attend the examination into the soundness of the Cornwall Site Allocations DPD on their behalf.
- 1.2 Wainhomes is a key developer within Cornwall and will continue to be an important delivery partner for the Council in meeting its open market and affordable housing needs during the plan period. Their landholdings and developments can also facilitate further mixed use development including employment and social infrastructure. Wainhomes made representations to, and appeared at the examination of, the Local Plan: Strategic Policies (LPSP).
- 1.3 This statement summarises our client's position in response to the Inspector's schedule of Matters and Issues (INSP.S4), specifically the questions under Mater 6: Falmouth & Penryn Spatial Strategy and Allocations. It should be read in conjunction with our detailed representations to the Submission Version of the plan (ID: 192), and our other Position Statements submitted to this examination.
- 1.4 Wainhomes are promoting the land at Union Road, Falmouth as an allocation for residential development. A site location plan is attached to our representations to the Submission Version. The Council proposes to designate the site as a 'green buffer. We object to this proposal, and have submitted detailed landscape evidence. The site is adjacent to the allocation under Policy FP-H3, and would form a natural and logical extension of the draft allocation for housing.

## **2. Response to General Issues**

### **a. Is the Strategy for Falmouth and Penryn consistent with the LPSP?**

2.1 No comment.

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

2.2 We refer to our comments in response to question (g), specifically in relation to whether there is sufficient flexibility within the supply.

### **c. Is the approach to the selection of sites for allocation consistent with Strategy, including with respect to the use of previously developed (brownfield) and greenfield (agricultural) land?**

2.3 No comment.

### **d. Is the approach to the provision of student accommodation appropriate with respect to its relationship to the market and affordable housing market within Falmouth and Penryn?**

2.4 No comment.

### **e. Are the Green Buffers (south of Penryn and east of Falmouth) appropriate with respect to the Strategy and necessary in planning terms?**

2.5 No. Our client's land at Union Road, to the north-east of Falmouth, is identified within a 'green buffer' as shown on Figure FP1. The Council has not put forward any evidence in relation to the proposed designation. Both the draft plan and the evidence base fail to explain or provide any justification for the green buffer. The proposal is not justified, and should be deleted from the plan.

2.6 In contrast to the Council, we have provided technical evidence in relation to the draft designation. Landscape experts Tyler Grange have undertaken an assessment of the proposal to include the site within the green buffer. Their report was appended to our representations to the Submission Version (ID: 192) at appendix EP11. Their assessment finds no justification for the

proposed green buffer, and they consider that development can be achieved within the site without any significant adverse impacts upon the landscape or the perceived gap between Falmouth and Penryn. The identification of a Green Buffer is not necessary in planning terms, and it is not justified.

- 2.7 In addition, the plan does not provide any specific policies in relation to the identified green buffer. It is not clear what its function or purpose is. There is no policy within either the LPSP or the Allocations DPD setting out what types of development are permitted and/or restricted within the green buffer.
- 2.8 In light of the above, we consider that the proposed green buffer should be deleted from the proposals map in its entirety. However without prejudice to that position, if the green buffer is to remain then we consider that our clients land should be excluded, on the basis of the specific evidence that we have put forward in relation to our client's site.

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

Policy FP-H2: Falmouth North

- 2.9 We object to the allocation of this site ahead of our client's land known as Union Corner. In contrast to the land at Union Corner, the development of FP-H2 would be clearly seen within wider views and would diminish the contribution the lower landform makes to the visual and physical separation of the two settlements. This is due to the more open nature of the land (particularly on the western side where it adjoins the A39) as a result of there being far less tree cover (see appendix EP11 of our Submission Version representations (ID: 192), paragraph 2.10).
- 2.10 The allocation is not justified, is that it is not the most appropriate strategy when considered against the reasonable alternatives.

Policy FP-H3: Kergilliack (Phase 2)

- 2.11 Wainhomes are promoting the land at Union Road, Falmouth as an allocation for residential development. A site location plan is appended at EP10 of our representations to the Submission Version (ID: 192). The site is adjacent to the allocation proposed under Policy FP-H3, and would form a natural and logical extension of the draft allocation.

- 2.12 The site comprises 1.4ha and is capable of accommodating approximately 42 dwellings. The site is under the control of Wainhomes and could come forward immediately for development. It is viable and deliverable.
- 2.13 The site is located to the north of the proposed allocation FP-H3. It is bordered by existing and proposed development to all sides, with Union Road to the east, Hillhead Road to the west, and Hillhead Farm to the north. The A39 lies to the north of Hillhead Farm. The site is extremely well contained and alongside site FP-H3 would form a very logical extension of Falmouth. The site could be identified as an extension to FP-H3, or in the alternative as a separate allocation alongside it.
- 2.14 Reviewing the evidence base, in particular the Falmouth and Penryn Housing Evidence Base Report, it is not clear why the site has not been allocated. The site falls within cell 5, but the site is removed from the parcel at stage 7 of the assessment (urban design analysis). Appendix F of the report states the following in respect of cell 5, criteria 4:

*"There would be significant impact on the greater part of this cell on higher ground, with some impact on the identity of local character of Falmouth for the remaining parts of the cell area due to proximity and encroachment towards Penryn. The cell is very prominent in the sky line due to its topography. This could be mitigated through limiting the extent of the cell boundary to the north."*

- 2.15 It is impossible to reconcile the above statement with the situation on the ground, in particular in relation to our client's land. The northern part of the cell put forward by Wainhomes benefits from a significant amount of existing screening, in particular from the surrounding road network, and is extremely well contained. Consequently there would still be a very well defined buffer to the north, with no perceivable encroachment towards Penryn. In this regard we note that the plan proposes to allocate sites FP-H1 and FP-H2 all the way to the A39, despite similar conclusions being drawn in the assessment to cell 5. The Wainhomes land is also relatively flat and is clearly not prominent in the sky line. In any event the wider cell rises to the south, and therefore we cannot see any justification for limiting the extent of the cell boundary to the north, beyond retaining and if necessary strengthening the existing screening. Furthermore, for the reasons we set out below, we disagree that the site should be included within a 'green buffer'.

2.16 We consider that the assessment and conclusions are flawed, and the site should be re-assessed. Our conclusion is that the Wainhomes land at Union Road can be developed without any significant harm to the identity and character of Falmouth or Penryn, and it is therefore logical to include it as part of the allocation.

**g. Is there robust evidence that the allocated sites and infrastructure 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?**

FP-H2: Falmouth North

2.17 The site is expected to start delivering in 2021/22, to achieve 300 dwellings during the plan period. We understand that an application is yet to be submitted, and the site is not yet in the control of a developer. There is therefore significant uncertainty as to whether this quantum of development can be achieved.

2.18 We also note that the policy requires the developer to provide a vehicular link over the railway line. The costs associated with such a link are likely to be substantial. There is no evidence available in relation to the costs of delivering such a bridge, and as such there is insufficient evidence to demonstrate that the site as envisioned is viable.

General comments

2.19 Including the draft allocations and what the trajectory indicates that they can deliver up to 2030, the CSADPD plans for a supply of just 3,019 dwellings against a minimum requirement of 2,800. This would provide a flexibility factor of just 219 dwellings, equating to 8%. We consider that this provides insufficient flexibility to respond to changing circumstances, i.e. slippage in the delivery of housing from strategic sites, as required by the Framework.

2.20 The supply for Falmouth & Penryn already includes reasonable allowances in terms of small site windfalls of less than 10 dwellings, and other urban capacity from the SHLAA of more than 10 dwellings. Consequently there are no other potential sources of flexibility available to the settlement, other than site allocations. If there is any slippage in any element of the supply, a shortfall against the requirement is almost inevitable.

2.21 We have recommended that at least 20% flexibility is provided in to give the plan a realistic prospect of meeting the minimum requirement. This would require allocation of additional sites through the CSADPD.