

**CORNWALL SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT EIP 2018 WEEK 2
The Falmouth Hotel, Castle Beach, Falmouth, TR11 4NZ**

DAY 4 - TUESDAY 13TH MARCH 2018

MATTER 6 FALMOUTH AND PENRYN SPATIAL STRATEGY AND ALLOCATIONS

FALMOUTH TOWN COUNCIL – POSITION STATEMENT

Submitted on behalf of Falmouth Town Council by Steve Besford-Foster, BA(Hons), DMS, MRTPI

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

FTC's position is that the CSADPD strategy for Falmouth/Penryn is sound in terms of its conformity with both LPSP and NPPF. However, as noted in our responses, it could benefit from a fuller exposition to emphasise the links from strategic to local planning policies. This could provide more explicit guidance for and connexions to Neighbourhood Planning activity in the area, that would help to build a stronger sustainable development strategy in this key strategic area of Cornwall.

6. 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?

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

FTC's position is that, given the limited capacity of the settlements within the Falmouth/Penryn area, and the housing requirements set, it is entirely appropriate to allocate sites which adjoin the built-up area as 'urban extensions'.

However, FTC has two concerns with the approach to the selection of sites adopted:

1. The CSADPD underestimates the potential urban capacity within Falmouth, which the FNDP suggests could be as great as 240 new homes, if high quality designs at densities of 70 dwellings per hectare (dph) and above are successfully achieved. Such provision could reduce the pressure for further greenfield allocations and contribute to the regeneration of Falmouth¹.

2. The Urban Extension allocations (FPH 2, 3 & 4) and permitted sites are appropriate for selection. However, as extensions to Falmouth they should be perceived as sustainable communities that form neighbourhoods of the existing Falmouth communities and be fully integrated with them, rather than being in effect, separate satellite settlements that will never integrate well with the rest of the town. These developments will also inevitably have significant effects on the town and should clearly be responsible for their impact upon it.

In the absence of guidance on this in the CSADPD the FNDP has proposed two potential communities that include the allocated sites, within a sustainable neighbourhood framework comprising various measures that would make the growth proposed in the DPD sustainable, and not simply be the addition housing numbers. The aim being to build a closer relationship with them, to draw the

¹ The Draft Falmouth NDP gives more details in its Section 5 and supporting Strategy & Housing Report

external developments to 'face' the town socially and economically and making them part of the narrative of 'greater' Falmouth.

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?

FTC's position is that the CSADPD student accommodation strategy is entirely appropriate in that it:

- Provides a mechanism to address student demand on the local private rented sector and thereby reduce pressure for additional HMOs;
- Will lead to the reduction of HMOs, or their release back to the local private rented sector, thus alleviating some of the community balance, character and environmental harm experienced in the most popular areas;
- Responds to strongly expressed community representations on the issue of student accommodation (also experienced with the FNDP)

The FNDP submission draft has been drawn up to support the CSADPD student accommodation strategy.

The student accommodation strategy and associated sites should be bought forward as quickly as possible, otherwise rising student demand will outstrip supply, continuing pressure for conversions to HMOs and impacting on the local private rented sector, and FTC looks forward to the CSADPD's early adoption.

Concern has been expressed that a number of recent appeal decisions allowing Purpose Built Student Accommodation could undermine the strategy, leading to a plethora of new PBSA applications and an increase in student issues in the town. Whilst a significant release of PBSA might have that impact, FTC is of the view that the numbers of additional students that could be accommodated by the recent appeals are not significant enough to have such an impact.

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

FTC's position is that the Green Buffers are important to provide separation between the growing settlements, provide a valuable landscape setting, act as biodiversity corridors, and complement the Green Corridor and Garden Walks shown in the FNDP which provide opportunities for healthy activity.