

CORNWALL SITE ALLOCATIONS DPD
MATTER 6: FALMOUTH & PENRYN SPATIAL STRATEGY AND ALLOCATIONS
**REPRESENTATIONS PREPARED BY LICHFIELDS ON BEHALF OF THE CHURCH
COMMISSIONERS FOR ENGLAND**
REPRESENTOR NUMBER: 219B
A. Is the Strategy for Falmouth and Penryn consistent with the LPSP

As set out in the Plan, housing requirement across Cornwall is 52,500 homes over the Plan period and in the Falmouth and Penryn area (F&P), the apportionment is 2,800 dwellings with paragraph 1.62 noting that the residual level of growth (600 dwellings) will be provided through allocations in the SADPD.

In F&P, the LPSP housing target was prioritised to the urban area. However, since adoption of the Plan, it is noted that further assessment by Cornwall Council (CC) has demonstrated that urban sites, together with permissions and completions, would not achieve the target.

Consequently, sites on the edge of F&P are required and have been proposed to provide at least 686 dwellings (paragraph 7.38, SADPD). It's noted that Examination document D10.1 puts the residual requirement at 517 dwellings. This is considered to be the right approach and in accordance with the requirements of the NPPF.

Five urban extension sites have been identified in the SADPD to deliver the remainder of the housing target which, together, could provide circa 856 dwellings (CC.S4.4 - Appendix 4). As the total housing requirement and the area specific requirements are minima it is appropriate that they should not be artificially suppressed.

Indeed, NPPF is clear that *“Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth”* (paragraph 17).

As such, given Falmouth's status as a main town and one of the most sustainable locations for housing growth in Cornwall, it is considered that providing the housing proposed is wholly appropriate and meets the requirement of paragraph 47 of NPPF which seeks to boost significantly the supply of housing and meet in full the objectively assessed need. The proposed strategy is positively prepared, justified as the most appropriate strategy. It is consistent with national policy and it is deliverable (as identified in CCE representations to question g below).

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

CC has produced a number of housing land supply position statements with the latest providing the position as at 01/04/17 (CC.S4.4 - Appendix 4) in response to questions raised by the Inspector (INSP.S6). Having reviewed this latest document along with the accompanying evidence base it is considered that the evidence is robust with respect to F&P.

In terms of the proposed allocations, CC has assumed a delivery rate of 35 dwellings per annum for sites over 100 units (E6.3). As noted within CCE's response to question g below, following

market advice from Savills with respect to site FP-H2, it is considered that this delivery rate is conservative yet robust for the purposes of assessing supply.

When considering delivery across all sites, CC assumes that on average 162 dwellings per annum will be completed in F&P between 2017/18 and 2029/30. Based on marketing input provided by Savills (see response to question g), this is considered to be an appropriate level of growth across the CNA and provides sufficient lead in times to enable the required infrastructure to come forward in a timely manner and for new homes to be delivered.

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

The LPSP is clear that the housing target pursued within the draft Plan was prioritised to the urban area. In line with NPPF paragraph 111, CC has sought to encourage the effective use of previously developed land. However, through further assessment after adoption of the plan, CC identified that requirements could not be met through this strategy alone and consequently sites on the edge of F&P are required to meet the 2,800 dwelling target. This approach is consistent with the LPSP strategy and NPPF guidance.

Five urban extension sites have been identified in the SADPD to deliver the residual requirement which could not be met within the urban area. The assessment of these sites is clearly presented in document D10.1 which details the extensive sifting process undertaken to determine the most appropriate sites to accommodate future growth. It is considered that this document and its conclusions are robust.

The sites have also been subject to significant consultation and in the case of site FP-H2, has attracted minimal objection. Indeed, at Regulation 19 stage, just 3 objections were received, 1 neutral comment and 4 representations of support.

The approach to site selection in F&P is, therefore, both consistent with the LPSP strategy and the NPPF and is considered to be robust. Consequently the decision to allocate appropriate greenfield sites with strong connectivity to the existing settlement is appropriate.

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?

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?

Development of site FP-H2 (Falmouth North) provides opportunity to clearly define the limits of Falmouth and assist in managing future potential for encroachment towards Penryn through the provision of a strategic landscape buffer adjacent to the A39.

As demonstrated within the submitted planning application on site FP-H2, the landscape green buffers have been developed as part of the development constraints from the inception of the proposal before the scheme was designed. These buffers afford the scheme visual buffering to filter and screen the proposed development and enclose FP-H2. Along the western edge of FP-

H2, this buffer has been designed with a substantial width (nominally 20 metres or greater) and will be offset from the existing field hedgerow and tree components bounding the A39 route.

The combination of the existing road corridor landscaping and the proposed buffers will create a significant green corridor to the western edge of Falmouth. This buffer will create a robust, defensible edge up to which the new development at FP-H2 will expand, and the development of FP-H2 will be experienced as the new urban edge of the town limiting the perception of Falmouth coalescing with the neighbouring settlement of Penryn. The buffer will also filter and screen views of the proposed scheme from the existing residential development, and effectively break up the perception of the development mass in terms of the existing and proposed built form.

The proposed layout of FP-H2 has been designed to imbed these landscape buffers, and afford the appropriate level of mitigation. These landscape buffers will integrate existing green infrastructure assets (where appropriate), and through their integration with the proposed green corridors through the scheme will provide opportunities for green and blue infrastructure, ecological enhancements, as well as amenity opportunities for walking and cycling.

The Church Commissioners support the allocation of site FP-H2 and consider the level of separation between F&P which will be maintained to be appropriate and in line with the LPSP Strategy.

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

We respond to this question with respect to site FP-H2 (Falmouth North).

FP-H2 is owned by the Church Commissioners and is currently subject to a live outline EIA planning application (PA17/12164) which broadly reflects the requirements set by draft Policy FP-H2.

The site is highly sustainable, being within easy walking and cycling distance of a number of existing services and facilities. The site has been identified as appropriate for allocation by CC on the grounds of its sustainability credentials and specifically the opportunities which it presents for interconnectivity.

The site is relatively unconstrained and the application submission provides significantly more information on site FP-H2 than is currently available through the CC evidence base. The application documents are available should any outstanding queries regarding the site's suitability remain. A brief summary of the key matters addressed within these documents are considered below:

- 1 **Vehicular Bridge:** the site is divided into two parcels connected via a bridge used for agricultural purposes only. To deliver housing, a new vehicular bridge is required. Negotiation with Network Rail is underway and the delivery of the bridge is not considered a barrier to development.
- 2 **Visual Impact:** The site is visible from wider viewpoints, including the AONB, and therefore careful consideration has been given to the layout, landscape scheme and design quality to appropriately manage and mitigate visual impact, including a significant landscape buffer to the northern boundary.
- 3 **Flood Risk:** the site is within Flood Zone 1 and is not liable to flooding.

- 4 **Drainage:** an appropriate strategy for both surface and foul water disposal can be delivered.
- 5 **Highways:** there are no highway capacity issues.
- 6 **Ecology:** appropriate mitigation is proposed for foraging/roosting bats across the site.
- 7 **Fal and Helford SAC:** A S106 contribution would be made to mitigate the potential contributory recreational effect on the SAC.
- 8 **Noise:** appropriate mitigation can be provided to minimise noise disturbance from the A39.
- 9 **Air Quality:** appropriate mitigation measures during the construction and operational phases are proposed.
- 10 **Loss of Agricultural Land:** the site is predominantly Grade 2 land. However, the urban fringe of Falmouth is almost entirely Grade 2 and therefore any expansion of the town will see the loss of such land.
- 11 **Trees:** Existing hedgerows, trees and planting are to be retained where feasible.
- 12 **Archaeology:** No 'highest significance' features have been identified. Appropriate mitigation measures will adequately offset impact of potential buried features.
- 13 **Heritage:** no resultant harm to the setting of heritage assets has been identified.
- 14 **Open Space:** The proposed development would incorporate a significant area of open space including a LEAP and a LAP. The site is close to Trescobeas open space. S106 contributions could mitigate any identified shortfall.
- 15 **Infrastructure:** The impact on education and healthcare facilities can be absorbed due capacity in current provision within the local area.

In addition, the benefits of developing this site are numerous including the provision of much needed family housing within a highly sustainable location, affordable housing and a significant boost to the local economy through job creation at the construction stage which would contribute circa £6.2m in GVA.

The Church Commissioners are committed to seeing this site come forward for development as evidenced through the submitted planning application. As discussed below, there are no known barriers to the site's timely delivery in line with CC's assumptions.

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?

We respond to this question with respect to site FP-H2 (Falmouth North).

The Site

Falmouth North is owned by CCE and is currently subject to a live outline planning application for up to 315 dwellings, 280 sq. m of mixed use development (D2/A1/C3) uses, a new vehicular bridge, public open space and associated works.

The site is formed by two land parcels which are separated by a railway line. The planning application therefore applies for a new vehicular bridge which will connect the two land parcels.

The application (Ref: PA17/12164) was submitted and validated on 21st December 2017. A significant amount of masterplanning and assessment work has been undertaken in the preparation of the application, pre-application meetings have been held with CC (last meeting was held in July 2017), separate meetings with various stakeholders relating to technical matters (including highways and drainage), public consultation has been undertaken and the scheme was presented to the Design Review Panel in October 2017. Feedback on the proposals has been largely very positive to date.

The application, which is supported by an Environmental Statement, establishes that there is capacity in the local infrastructure (subject to S106 contributions) to support the proposed development and that it would cause no harm in terms of environmental impacts.

Discussions with Network Rail (NR), regarding the bridge, are progressing well and the application is supported by a detailed drainage strategy, which has been prepared in consultation with the relevant stakeholders. Further information has been requested by the Local Drainage Authority on the drainage strategy following submission of the application and CCE's technical advisors are currently working closely with CC to provide the necessary information.

Other than the requirement for a new vehicular bridge, as demonstrated through the planning application submission the site is relatively unconstrained. Additional information to demonstrate deliverability has been provided and is referred to in the statement below.

Housing Delivery Rates

CC is proposing to allocate this site for approximately 300 dwellings and the latest housing trajectory (March 2017) anticipates 35 completions in the period 2021/2022 with the scheme proposed to be built out by 2029/2030.

The delivery rate of 35 dwellings per annum has been based on CC's evidence relating to historic delivery rates for sites of over 100 units (document E6.3).

CC's evidence (document E6.3) also considers appropriate lead in times which anticipates an average of 24 months between the approval of outline consent and approval of reserved matters for schemes of over 100 units. Applying CC's assumptions to Falmouth North, the following timescales for delivery would be assumed:

- Outline planning application submitted: December 2017
- Outline planning approved: summer 2018
- Reserved Matters submitted: winter 2019/20
- Reserved Matters approved: summer 2020
- Commencement on-site: autumn/winter 2020;
- First completions: spring/summer 2021
- 35no. completions by April 2022.

The submitted planning application considers potential for the site to deliver circa 60 dwellings per annum and for development to commence in summer 2020. However, whilst the

assumptions made by CC are perhaps conservative, for the purposes of ensuring a robust assessment, we agree that the delivery rates are acceptable with any potential for exceedance considered a benefit to housing delivery.

As discussed above and below there are no known barriers to the delivery of site FP-H2 which would result in the site not delivering at the required rate within this period.

Infrastructure Delivery

The infrastructure requirements of site FP-H2 are detailed below.

Vehicular Bridge

CCE recognise that to deliver FP-H2 there is a requirement for a vehicular bridge over the railway line to connect the two land parcels. The need for a bridge requires negotiation with Network Rail (NR).

It's envisaged that the programme of securing the necessary agreements with NR will take circa 1 year although these discussions are already underway. Once on site, it's estimated that the bridge construction will take circa 6 months. As such, no significant delay to the project timescale is anticipated.

It should also be noted that with regard to the bridge, dwellings can be constructed on the western parcel prior to its final construction which will assist with delivery.

CCE are therefore confident that the expected delivery targets (35 dwellings by April 2022) can be met if not exceeded.

Drainage Strategy

As established within the planning application submission, the site is wholly within Flood Zone 1 and is not classified as being at risk from flooding. In terms of surface water drainage, a number of options have been considered within the submitted Flood Risk Assessment with the optimum solution identified as a direct outfall from the site to the tidal River Penryn. This will be provided by one of the following approaches: (i) utilisation of existing outfalls subject to capacity checks and stakeholder approval; (ii) construction of a new S104 public surface water sewer by agreement with landowners; or (iii) requisition via the Water Industry Act S98-101 process of a new surface water outfall from the site to the estuary by South West Water (SWW).

This solution, which has been agreed in principle with SWW, will remove all surface water from the site, bypassing downstream receptors, directly to the estuary which is tidally influenced, thus reducing flood risk between the site and the River.

We noted above that the Local Drainage Authority has requested additional information regarding the submitted drainage strategy. CCE's technical advisors are working with the Council to agree all matters relating to drainage and it is not considered that this raises an issue given the amount of work that has been undertaken on these matters to date.

It has also been confirmed by the EA that the River Penryn is tidal at this location and, therefore, discharge from the site would not require attenuation and control. However, to assist with the ecological elements of the site, ponds have been proposed as part of the illustrative masterplan for the scheme. These ponds will be fed by the surface water run-off from the site being discharged at a controlled run-off rate.

A surface water drainage system can therefore be provided at the site which would not increase the risk of flooding elsewhere. The proposed development would, therefore, be in accordance with national policy and Local Plan Policy 26.

With regard to foul water, SWW has confirmed that foul sewage from the development can be discharged to the existing foul sewer, but that off-site sewer upgrade works may be required. The proposed development can be drained by gravity fed sewers to the head of the exiting gravity system.

To conclude, as demonstrated through the submitted planning application, the required drainage infrastructure is not considered to be a constraint and will not have a detrimental impact on project timescales.

Site Access and Highway Improvements

It has been agreed with the Highway Authority that the only vehicular site access and egress required to the site is from the A39 / Union Road (Hillhead) roundabout through the provision of a fourth arm into the site. The delivery of this access is straight forward to deliver and would not impact on overall project timescales.

In terms of the wider highway network, the Transport Assessment which accompanied the planning application assessed junction capacity and forecasts that:

- All junctions currently operate within capacity (2017).
- All junctions are forecast to operate within capacity in a forecast year of 2022, without the proposed development in operation.
- All junctions are forecast to operate within capacity in a forecast year of 2022, with the proposed development in operation.
- The exercise undertaken for the Quay Hill / Commercial Road Signalised Junction shows that the impact will be an additional vehicle every three minutes which is considered minimal.

The TA demonstrates that there are no highway capacity issues associated with the delivery of the site for up to 315 dwellings. Thus, the residual cumulative highway impacts of the development will not be severe and therefore does not require significant improvements to the network.

Conclusions

In line with NPPF Para 177, CCE confirm that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion.

It is considered that this statement has presented robust evidence which demonstrates that site FP-H2 can 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.

It is recognised that the site has abnormal infrastructure costs but, as set out above, the timing and delivery of these requirements is not prohibitive and can be managed in line with the logical phasing of development. As such, these requirements will not impact on the Council's robust assumptions on housing trajectory and delivery of the five year housing land supply.