

1. Introduction

This Statement has been prepared by Savills on behalf of John Lewis Partnership Pensions Trust (JLPPT). The content of this Statement supplements the representations previously submitted to Cornwall Council in respect of the Pre Submission draft Cornwall Site Allocations DPD on behalf of JLPPT in August 2017 (Reference: John Lewis Partnership Pension Trust (Savills) [231a]).

The pre-submission representations set the context and explained the background to the Site. Section 3 of the those representations describe JLPPT's land interest in the emerging allocation, the existing mix of uses on site and the relationship of the site with the other landowners with the emerging allocation and the preparation of a masterplan.

This Statement specifically addresses questions d. f. and g. of the Inspector's General Issues set out in Matter 6: Falmouth and Penryn Spatial Strategy. These questions relate to the approach to the provision of student accommodation within Falmouth and Penryn, the suitability of the sites put forward for allocation and whether the sites can be delivered at a sufficient rate and to a suitable timescale. For completeness, we have also provided comment on JLPPT's position in respect of the other questions raised.

2. Response to Inspectors Questions – Matter 6

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

We have no comments to make on this question.

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

We have no comments to make on this question.

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?

We have no comments to make on this question.

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

Policy PP5 of the adopted Cornwall Local Plan requires the focus of housing delivery within the towns in the Falmouth and Penryn Community Network Area to provide an appropriate mix of housing to address local housing need, and the need for student accommodation. We support this objective.

However, without taking a positive plan led approach to the provision of student housing through the allocation of suitable sites, we agree with the Council that unmanaged growth of the student population would continue to have significant detrimental impacts upon the local housing market.

The Council's decision to introduce an Article 4 Direction to control the permitted change of use from open market residential dwellings to houses in multiple occupation in Falmouth is likely to only make the availability of student accommodation more acute, certainly in the context of the University's aspirations to increase the number of students enrolled at Falmouth and Penryn Campus's in the immediate short term. Furthermore, without the release of suitable sites for student accommodation through a positive plan-led approach, the lack of student accommodation is likely to place pressure on the existing housing market and would in turn potentially cause affordability issues due to lack of supply.

Suitable sites should therefore be identified to meet the University's immediate requirement for proposed built managed student accommodation in a manner that is commensurate with the scale of expansion of the Universities in Falmouth and Penryn.

Whilst we support the Council's strategy to allow for growth within the short, medium and longer term to support the University's growth ambitions, the need for student accommodation is based on a student demand figure which is not supported by evidence.

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

We have no comments to make on this question.

Position Statement: John Lewis Partnership Pension Trust (Savills) [231a]

Issues relating to individual sites – Proposed Policy FP-M2 (Parkengue)

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

We agree with the Council that the Site subject to Policy FP-M2 is appropriate for an allocation for mixed development. Indeed, we agree that the site should deliver employment floorspace, however the emphasis for delivery of development on site should be focused on the provision of student accommodation in line with the principal aspiration of the policy.

The initial feasibility work that has been undertaken demonstrates that the allocation has the potential to deliver near to 1,000 student bedspaces, in excess of the 550 student bedspaces identified in Policy FP-M2.

The Site is suitable, available and deliverable, there are no physical constraints that would preclude the development of the site and there is no restriction to it contributing towards meeting the student housing needs for the area.

Further technical work has been undertaken on the Site to inform draft proposals which have been the subject of pre-application discussions (ref: PA17/01957/PREAPP) with the Cornwall Council and parties that have land interests within the emerging 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?

Whilst we support the Council's strategy to allow for growth within the short, medium and longer term to support the University's growth ambitions, the need for student accommodation is based on a student demand figure which is not supported by evidence.

Suitable sites should be identified to meet the University's immediate requirement for purpose built managed student accommodation in a manner that is commensurate with the scale of expansion of the Universities in Falmouth and Penryn; this is consistent with one of the three points that underpin the Council's approach for the management of anticipated student accommodation growth in Falmouth and Penryn. Guidance should therefore be sought from the University in respect of the immediate need for purpose built student accommodation in line with their growth.

The Site is suitable, available and deliverable within the plan period. In this respect, further technical work has been undertaken on the Site which has been led and informed by pre-application discussions with Cornwall Council. The draft proposals for the Site have evolved as part of a collaborative and joined up masterplan process for redevelopment across the allocation as a whole.

3. Conclusion

Through our representations and Position Statement, we have reviewed the evidence base underpinning the proposed approach for the allocation of land at Parkengue.

Whilst we support the principle of the allocation of the site, we continue to suggest that the site should deliver 1,000 plus purpose built student accommodation bedspaces in order to meet the immediate short term need of the University.

JLPPT are working positively with the other parties who have land interests within the emerging allocation to prepare a joint masterplan that will underpin the submission of individual planning applications for mixed used student-led redevelopment proposals. The masterplan has also been the subject of positive engagement with Cornwall Council Planning Officers and Falmouth University.