



INSP.S4 Matter 6 Falmouth & Penryn Spatial Strategy & Allocations

Cornwall Council Position Statement

02 February 2018

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

Yes, the SADPD was developed over a period of time, which supported the production of the LPSP and the strategy for Falmouth & Penryn, as well as the SADPD responding to the LPSP as it was finalised. The following table highlights the CNA objectives set out in the Cornwall Local Plan CNA sections, together with comments on how the SADPD strategy and policies compliment them.

LPSP CNA Objectives (summarised)	Relationship with the SADPD
<p>Objective 1 – Housing Growth Manage location / distribution / mix of housing Address housing/student accommodation. In the villages focus on affordable housing need.</p>	<p>SADPD identifies four allocations to ensure that the LPSP housing target can be achieved, having regard to permissions / completions already in place.</p>
<p>Objective 2 – Employment Encourage employment particularly in relation to the Universities, Docks/Port and tourism.</p>	<p>Three strategic employment sites (FP-E1 to E3) are safeguarded in the SADPD, along with three r sites (FP-E4 to E6) to specifically support the marine economy. Two sites (FP-M3 & M4) are allocated to provide additional employment capacity for new businesses / research growth supporting the economic potential generated from outputs of the Universities, particularly from Penryn Campus.</p>
<p>Objective 3 – Falmouth Town Centre Maintain Falmouth as strategic centre. Seek opportunities securing the centre’s vitality/ viability. Strengthen retail provision in town centre. Enhance environment - consider pedestrian prioritisation / public realm improvements.</p>	<p>SADPD includes a section on retail (para 7.29 to 7.35); discussing the importance of the retail centre and of supporting retail provision within the town to improve vitality; the SADPD doesn’t allocate any out-of-town sites for retail, ensuring the town centre continues to be prioritised for retail uses. The Transport Strategy (Figure FP2) highlights opportunities for an economically led regeneration of the town centre; which could include the future approaches to traffic management to make the town centre more attractive for pedestrians.</p>
<p>Objective 4 – Community Services and Facilities Improve services and facilities - overcome shortfalls - meet further</p>	<p>The Strategy sets out the importance of the local services and facilities within the main centres of Falmouth and Penryn. The Infrastructure section</p>

<p>demand resulting from growth.</p>	<p>at paras 7.52 – 7.61 highlights the importance and status of key infrastructure to support the growing communities. Additionally, the SADPD policies identify the requirements for additional/new facilities to support existing and new (growth) local communities within the towns, in addition to the provision within the main town centres.</p>
<p>Objective 5 – Sport and Leisure Consider sports / leisure / full potential of waterfront / opportunities for employment / leisure / tourism.</p>	<p>The SADPD seeks to safeguard three key waterfront sites (FP-E4, E5 & E6) for uses related to the marine sector; access to the water; employment and marine related opportunities arising from such locations.</p> <p>Additionally the GI Strategy sets out the Councils approach to the delivery of sports provision as part of its wider open space strategy (Table FP4) and that each site allocation policy identifies the requirement for development to make provision for open space (including sports) as part of any new development.</p>
<p>Objective 6 – Transport Infrastructure Ensure infrastructure, (inc. parking / sustainable transport), is adequate. Tackle congestion at key junctions / approach to towns at Treluswell / Treliever / Kernick Roundabouts. Improve accessibility to I services / facilities</p>	<p>The SADPD includes a section on Falmouth and Penryn’s Transportation Strategy, which includes measures to improve sustainable transport measures. It is noted that that the major road improvements at Treluswell and Union Corner are now completed, addressing local congestion and enabling additional capacity for the local network.</p>
<p>Objective 7 – Economic Development, Environment and Coast Balance economic development, maritime industries, coastal access, manage flood risk, protect environment. Address the relationship between Falmouth and Penryn / CNA villages, to preserve their separate identities.</p>	<p>The SADPD includes a section on retail (para 6.24 to 6.26) which discusses the importance of the retail centre and the softer measures that might be implemented to improve its vitality; plus the SADPD has not sought to allocate any out-of-town sites for retail, to ensure the town centre continues to be prioritised.</p> <p>The Green Infrastructure Strategy for Falmouth and Penryn sets out key habitat and movement corridors, along with other green assets and flood risk management measures that are important for the town. The associated</p>

	<p>GI strategy text also highlights some of the most important assets, which includes both spaces within the towns, but also spaces on the edge of the towns which play an important role in preserving the local identities of the towns and their outlying rural communities.</p>
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The LPSP CNA section highlights the importance of the separate identities of the two towns and surrounding rural communities as a main Objective, the key reason for including green buffers in the SADPD strategy for Falmouth and Penryn. It discusses the importance of the Docks and Universities for future economic growth; and, investment in new technologies and young people

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

Yes. The Council has provided an updated position (as at 1/4/17) to supplement data that was provided at the time of submission (based on figures as at 1/4/16). This updated information is set out in the Council's response to the inspectors' questions – INSP.S6 (CC.S4.4).

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?

Yes. As set out within the Housing evidence document (ref D10.1 – D10.1.8) the Council sought to identify appropriate sites within the urban area capable of contributing towards meeting the growth targets set by the LPSP. Only when this search was exhausted did the Council seek to identify additional greenfield land on the edge of the settlements for allocation.

The Council did not consider it necessary to allocate many sites within the existing urban area, as they were either very small and/or LPSP policies provide sufficient support to enable them to come forward. Furthermore the majority of the larger brownfield opportunities within Falmouth and Penryn have either already been built out or are subject to an existing planning permission. This is reflected in the level of completions and permissions since 2010.

The Housing evidence (D10.1 – D10.1.8) sets out the detailed assessment process that took place in considering greenfield options directly adjoining the existing built settlement, including mapping environmental designations; landscape character assessment, and accessibility mapping. This, in combination with the Sustainability Appraisal process, assisted in identifying the most

sustainable greenfield options for the Plan, and the preferred direction of growth to the North and Northwest of Falmouth and to the South and North of Penryn, these having good accessibility to the towns and their related facilities.

Consideration of Grade 2 and Grade 3 agricultural land was reflected within these assessments, and summarised within the Sustainability Appraisal. On balance the benefits that the sites offered outweighed the comparatively small loss of agricultural land, compared with the total quantum within Cornwall.

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?

Yes. LPSP policy 2a sets out the requirement to provide additional purpose built student accommodation (PBSA). Importantly this policy is in two parts. Firstly that additional PBSA is provided commensurate with the scale of any agreed expansion of student numbers at Penryn campus. Secondly, it requires that consideration is given to any changes to student numbers at other campuses in Falmouth and Penryn. The policy's aim is to ensure that demand from campuses in both Falmouth and Penryn are taken into consideration; but does not suggest that accommodation must be provided in both Falmouth AND Penryn. Instead this is left to the SADPD to identify the appropriate locations.

Currently students are accommodated in either the 2600 PBSA currently available, or within HMO's (approx. 750 homes in Falmouth-Penryn, delivering approximately 3800 beds). It is acknowledged that 10% of current students are from Cornwall and live at home. The majority of PBSA is in Penryn given the presence of the large provision at Penryn campus. The proportion of students living in both PBSA and HMO is approximately 50/50 between the two towns, mainly because of the large village on the campus for year 1 students, despite this 75% of students are educated in Penryn.

A large proportion of HMO accommodation is within Falmouth (75% of student HMO) and an imbalance in local demographic in some locations within the town; restricting the availability of family accommodation for other members of the local community.

The SADPD strategy for student accommodation covers both Falmouth and Penryn as a whole strategy, and not as two separate entities, as is intended when Policy 2a was written. It requires that growth is entirely accommodated by new PBSA, with the majority being provided either on or adjacent to the Penryn campus, that being the primary location of growth in student numbers. The strategy reflects the aspiration of the Universities to increase the number of Cornish students to 25% (but assumes only 20% living at home), and which is included within the S106 Obligation attached to the permission for student growth at Penryn campus

Providing additional PBSA around the Penryn campus (where 75% of all students in Falmouth and Penryn will be educated) brings a range of benefits including:

- Places students within walking distance of the main place of study
- Relieves pressure on highway network at peak times;

- Supports existing sustainable transport measures to further improve bus links between campuses and towns;
- Reduces loss of sites and property within Falmouth to student uses;
- Releases opportunities for housing within Falmouth;
- Helps rebalance the overall proportion of students between the two towns to 60/40 towards the Penryn campus

The Councils ambition is to also enable alternative opportunities for students to live in new PBSA and seek to attract students out of the current HMO stock of housing. Whilst the Council cannot directly draw students out of HMO accommodation, it can enable the provision of new, attractive and competitive accommodation as an alternative to the lower standards that are reported and experienced within HMO in Falmouth.

Table 1: Student growth and PBSA requirements (at a 0.8 ratio arising from Cornish students/living at home)

	Additional Students	Additional Student Beds Required
Penryn Campus	2500	2000
Woodlane Campus	230	184
Falmouth Marine School	217	162
		2346

Table 2: Additional supply of PBSA to meet growth requirements

<u>Additional SUPPLY of Accommodation</u>		
New PBSA		
Penryn Campus - Double Rooms (Completed)		400
1 Trescobae Road (Under construction)		15
Packsaddle (Under construction)		125
Ocean Bowl (Permitted)		190
Fish Strand (Permitted)		119
Roslyn Hotel (Permitted)		117
Penryn Campus (Permitted)		1047
Parkengue		550
Treliever		450
<u>ADDITIONAL SUPPLY</u>		3013

Table 2 represents the current strategy set out within the SADPD, plus recent permissions granted.

The large mixed use site at Treliever (FP-M3) is not likely to come forward in the short term, due to ongoing processes linked to its acquisition. As a site that will be available to deliver in the medium term, and in recognition of the other permissions that have been granted for PBSA, the Council now identifies a capacity of 450 units as part of any economically led mixed use development of the land is appropriate, in order to meet the remaining demand for PBSA projected at that time (although this could rise if demand existed in the long-term).

In addition to the site within Table 2, there is a current planning appeal at Falmouth Coachwork's (APP/D0840/W/17/3178389) is due to be considered on 21st February 2018, and which if allowed (as with other similar appeals) would add a further 135 units to the total supply identified at table 2 above.

The Council considers that the market is capable of delivering its strategy, as it is currently engaged with two PBSA developers at the Parkengue site FP-M2 who are seeking to deliver PBSA in excess of the capacity which the Council currently identifies. The Council is positively engaging with these developers in order to explore maximising the opportunities and making the most efficient use of this site. The Council is also directly intervening to acquire land at Treliever (FP-M3 & M4) to ensure the delivery of both economic and accommodation to enable the wider needs and growth of the Universities.

To provide some additional flexibility and address concerns from the Universities, there is an emerging Statement of Common ground with the Universities, which identifies the following changes and additional capacities to the Councils Strategy for PBSA, namely:

- Increasing the capacity of the **Parkengue Site Penryn (FP-M2)** to approximately 850 units in order to maximise the opportunities of the brownfield site in light of its proximity to the Penryn campus (proposed change reflects further analysis resulting from recent pre-application engagement); and
- The addition of approximately 400 units of PBSA as part of a mixed use development of the brownfield site at **Falmouth Road (FP-H4)**, in order to maximise the opportunities of this larger urban brownfield site, and to assist in the viability and delivery of the site as a whole (proposed change reflects recent pre-app engagement which demonstrates the ability to accommodate further development)

The Council's Strategy, together with recent planning approvals and inclusion of the additional capacities within the proposed statement of common ground (set out above), will deliver capacity that would more than provide for the additional demand for PBSA within the short and long term, and offers greater opportunities for some reduction in the number of HMO's.

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

Yes. The Council believes the green buffer south of Penryn and East of Falmouth is appropriate in respect of the town strategy, and is necessary in planning terms.

It directly addresses the objective within the LPSP CNA section, and balances a range of factors, including the natural environment. It specifically addresses the relationship between Falmouth and Penryn, and rural communities to preserve their separate identities, and reflects the constrained nature of the towns

This approach is further supported by a range of LPSP policies including most notably Policy 25: GI, and the need to provide appropriate buffers to natural spaces of significance.

The Council suggested additional wording to the GI Strategy in its response at CC.S.4.1 (AM 27) to clarify the importance and reasoning for the strategic gap between the two towns.

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

Yes. There are no landscape / environmental designations contained within the site allocations. The Falmouth and Penryn Housing evidence document (D10.1 – D10.1.8) mapped and considered all environmental designations in identifying site options.

A small part of the mixed use allocation at Parkengue FP-M2 is within flood zone 3b. The flood zone cuts through a small part of the site.

The Council undertook an SFRA considering the proposed mixed use development. The site passed the sequential test, with the exception test not being required in light of policy recommendations not to build within the flood zone.

Other employment and marine related sites at FP-E1 - FP-E6 is identified for safeguarding and sits within flood zones. These have also undergone SFRA and successfully passed the sequential tests, having appropriate regard to the low vulnerability of uses, and that allocations E4 - E6, are safeguarded specifically for marine related uses, which are acceptable within marine zones.

Policy 26 of the Cornwall LPSP ensures that development needs to implement appropriate SUDS drainage to ensure no increased or adverse effects downstream. This requirement is also referenced in the GI strategy text at 7.77.

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?

Yes. As set out in answering the Inspector's questions (INSP.S6 question 17) the Council provided updated statistics with regard to its housing supply position, and which is set out in Table 5a) within Appendix 4 of the Councils response (CC.S4.4). An extract of table 5a is set out below.

Area	Local Plan Target	Delivery Total		Delivery against Target	
		Gross	Net	Gross Delivery against Target	Net Delivery against Target
a	b	o	p	q	r
Falmouth and Penryn	2,800	3,048	3,019	109%	108%

This illustrated how the various sources of delivery (completions / permissions / urban sites and SHLAA / windfall / CLI& other / Allocations could provide 3,048 dwellings (gross) and 3,019 dwellings (net) within the plan period. This represents 108% of the LP: SP housing target.

As a result, there is sufficient identified supply of sites to ensure that the LPSP housing target for Falmouth and Penryn is met.

Additionally, there are other considerations which will have a positive effect on the deliverability of the Housing supply for Falmouth and Penryn:

- The allocation FP-H1 has secured planning permission for 150 dwellings (PA16/06414);
- Developer in place with masterplan prepared at FP-H2, currently in pre-app with Council
- Permission secured for 104 dwellings on part of FP-H3 (PA16/01003);
- Developer interest at FP-M2, plus pre-application engagement with Council
- Major highway works at Treluswell and Union Corner (within the transport strategy) now completed.
- The Council is taking forward the site at FP-M3 / M4

The Council have previously provided details of the core infrastructure requirements necessary to support growth at Falmouth and Penryn (CC.S3).

Funding to enable the delivery of necessary infrastructure will be secured from a range of sources:

- Developer Contributions – Site allocations are exempt from CIL, so will be secured through s106 agreements.

- Council sponsored funding bids – Cornwall Council has an excellent record of securing grant funding supporting the delivery of infrastructure to enable growth.
- Cornwall Council Investment Programme – Cornwall Council is developing an Investment Programme, which in part will support delivery of key infrastructure. This programme covers many aspects, including investment in infrastructure. This includes the Council’s traditional investment (e.g. without a return), and investing in infrastructure where developers will pay some/all of the money back at a later date; so enabling early delivery of critical infrastructure ensuring blockages to delivery are minimised.

Finally, the Council is also in discussions with the Government regarding post-Brexit funding, to replace EU funding; this will also support economic initiatives, such as those set out in the SADPD for the towns.