

CORNWALL SITE ALLOCATIONS DPD

POSITION STATEMENT
REPRESENTATION N0.158a

TUESDAY 10th APRIL 2018

MATTER NO 8
ST AUSTELL AND THE CARCLAZE AND PAR
DOCKS ECO-COMMUNITIES SPATIAL
STRATEGY AND ALLOCATIONS

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SPATIAL STRATEGY AND ALLOCATIONS

Introduction

- 1.1 We write on behalf of our clients the Trustees of the Stanley Martin Estate (representation number 158a).
- 1.2 These comments should be read alongside our earlier representations to the Site Allocations DPD.

General Issues

a. Is the Strategy for St Austell consistent with the LPSP?

- 1.3 No. It is our view that the SADPD seeks to interpret CLP Policy 2a housing figures as targets. The policy is clear in that it sets a minimum level for the provision of housing. The use of the word target in the Site Allocations DPD is clearly contrary to the CLP and should be changed to minimum. Paragraph 2.26 of our consultation response sets out a range of planning appeals which clearly establish the principle that figures contained in Development Plan Documents should be interpreted as a minimum.

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

- 1.4 The Government's proposed formula for assessing housing need, published 14th September 2017 would suggest that the current CLP figure of 2625 completions per annum should be increased to 2,889 per annum.
- 1.5 The combined CNA housing total for St Austell and the China Clay Area is 4,700. The Council's housing team response to the West Carclaze Eco Community planning application (ref. 14/12186), for inter alia 1,500 dwellings, indicated an affordable housing need for the area of 2,268 households. At a level of 30% provision of

affordable housing in the Eco Community area (rather than 25% in both St Austell and Treverbyn Parish areas), it can be clearly seen that the allocation is wholly inadequate to meet this need.

- 1.6 The delivery of housing in the greater St Austell area, and particularly within the Parish of Treverbyn, is largely dependent on the delivery of the single Eco Community proposal of 1,500 dwellings. These proposals have been long in gestation and the planning application submitted in 2014 remains to be determined.
- 1.7 Large complex schemes are frequently the subject of delays in delivery. Furthermore, there are at present no guarantees that the anticipated 1,500 dwellings will be delivered from the proposed area.
- 1.8 It is further noted that the current Eco-Community application proposals differ notably from the strategy set out in Policy ECO-M1 of the Cornwall Local Plan in that significant areas of greenfield land are now proposed for development.
- 1.9 The site the subject of our representation would provide certainty of delivery in the interim and also go some way towards meeting the currently established need to provide 234 affordable dwellings in the Parish of Treverbyn specifically.

c. Are the Green Buffers west of Carclaze Road appropriate with respect to the Strategy and necessary in planning terms?

- 1.10 No. The Council's stance on this matter appears inconsistent. Land west of Carclaze Road, which includes our clients site, has not been included within the "Cell" assessment of the wider area (see appendix 1 of our earlier reps dated August 2017). There are clear discrepancies in the plans which have been prepared by the Council. Figure STA1 includes this area within the proposed green buffer whilst the Proposals Map shows it as white land (i.e. not subject to any designations).
- 1.11 The SADPD states at paragraph 9.69, "*The A391 at the eastern edge of the town is a clear physical barrier which creates a logical edge to the town.*" No evidence was provided at the time of publication of the SADPD to justify a green buffer west of Carclaze Road sandwiched between existing housing and the A391 or to demonstrate why the currently undeveloped area should be treated differently from those areas subject to recent planning permissions, such as on land to the north west of the site (Hammer Drive) where no buffer has been provided.

- 1.12 The Council accept that, in principle, the southern part of our client's site could be developed (recorded in the Officer report for the earlier application at the site ref. PA16/11319 and pre-application advice PA15/00270/PREAPP, see paragraph 2.7 of our earlier representations).
- 1.13 It should be noted that the OS Plans which have been used by the Council are not up to date (2012) and do not accurately reflect the full extent of the existing built form adjacent to our client's site. For example, they do not show properties at Hammer Drive to the northwest of the site. The differences can be seen on plan 2 prepared by Enderby Associates (Appendix 2 of the earlier representations).
- 1.14 The green buffer notation appears to have 'washed over' areas of land without any clear analysis of their function and value. As set out in paragraph 2.14 of our earlier representations, our client's land is in private ownership, there are no rights of way over it and it offers no amenity for local residents, other than being open which can be said for any piece of undeveloped land. The site is also physically and ecologically separated from other land within the proposed buffer so lacks physical connectivity.
- 1.15 There are clear differences in topography between our client's land and land further south east, east of the roundabout with Carclaze Road (Cell 13), which slopes moderately to steeply from the A391 to the adjacent residential development to the south (as set out in the Council's Landscape Assessment).
- 1.16 The Summary Landscape and Visual Impact Appraisal undertaken to inform Planning Appeal ref. 3184721 stated:

"The site is therefore considered to be of medium sensitivity, although some more discreet parts (such as the southern field) are of low visual sensitivity. Tranquillity is generally Low due to disturbance from adjoining development and noise from the A391.

It is considered that the site is of Intermediate landscape value overall but the more contained parts have the potential to accommodate change through appropriately located and designed development that incorporates appropriate mitigation measures, including a buffer of undeveloped land on the more exposed northern and north eastern parts of the site. This is consistent with the Council's own statements regarding the site's potential to accommodate development referred to in section 2 above, (of the SADPD response) and the suitability of adjoining land at Gwithian Road (which has now been developed).

1.17 The professional assessment undertaken by Enderby Associates (Appendix 2 of our earlier representations) provides a clear indication that there is no strategic necessity for a green buffer designation in this location.

f. 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?

1.18 We are not aware of detailed evidence to either support or refute the ability of the major Eco Community site to be delivered in a timely manner. We have however set out our concern above with regard to the difficulties generally experienced with the delivery of large brownfield sites. Therefore, we are concerned that at best delivery will be delayed and that whilst Cornwall Council may be able to demonstrate a 5 year land supply in overall terms there could be a significant failure of delivery in the wider St Austell area. This will in turn adversely impact on the delivery of affordable housing for which there is a significant established need.