

Cornwall Site Allocations Development Plan Document

Position Statement on Behalf of Redrow Homes (205)
Matter 8 – St Austell and the Carclaze and Par Docks Eco-Communities Spatial
Strategy and Allocations

February 2018

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1.0 INTRODUCTION

- 1.1 This Position Statement has been prepared on behalf of Redrow Homes (Participant Number 205) in relation to the Cornwall Site Allocation Development Plan Document (CSADPD) and Redrow Homes' land interests at Coyte Farm to the south of Truro Road (A390), St Austell. The masterplan is included below.



- 1.2 As set out in more detail in our Position Statement on Matter 1, we consider there to be fundamental issues with Cornwall Council's five year housing supply. As a consequence, CSADPD is not effective, and is therefore unsound.

2.0 RESPONSE TO MATTER 8

Question A: Is the Strategy for St Austell consistent with the LPSP?

Housing Delivery

- 2.1 We do not consider the strategy for St Austell to be consistent with the Local Plan Strategic Policies (LPSP). Section 9 of the CSADPD deals with St Austell. It recognises that St Austell has witnessed substantial housing growth in recent years and represents Cornwall's largest town, but there remains a significant need for housing, particularly affordable housing. Despite this acknowledgment, the CSADPD allocations for St Austell do not go above the Local Plan minimum housing requirement or include any contingency/reserve sites to counter any potential supply issues. There are only two sites allocated for residential development – Higher Trewhiddle Farm (adjacent to Coyte Farm) for 100 homes and 25 homes at Edgcumbe. Heavy reliance is placed in the CSADPD on the delivery of 1,500 homes at West Carcleze Eco-Community. Due to their size and complexity, delivery of such sites can be notoriously slow to be delivered. This is particularly relevant to the West Carcleze Eco-Community which is required to deliver significant infrastructure and the CSADPD policy (Eco-M1) requires the site to be brought forward as one masterplan, not phased.
- 2.2 Given the rhetoric in the Local Plan and the CSADPD about the significant housing and affordable housing need in St Austell, the CSADPD is inconsistent with the objectives of the Local Plan set out in Policy 2a (Key Targets) and Policy 6 (Housing Mix). Due to lack of site allocations in St Austell, we consider the CSADPD to be inconsistent with the Local Plan and has not been positively prepared, as it is at risk of not delivering OAN, or the priorities of Local Plan policies 2a and 6.

Affordable Housing

- 2.3 As identified in the Site Allocation DPD, there is a significant need for affordable housing in St Austell. Cornwall Council has not published a Strategic Housing Market Assessment (SHMA) since 2013. In assessing affordable housing need the SHMA identifies 285 homeless households in Cornwall, which is significantly higher than in the neighbouring authorities of Plymouth, South Hams, West Devon and Dartmoor National Park.
- 2.4 To respond to the significant affordable housing need, Cornwall Council published a Housing Investment Plan 2012 – 2016, which includes a four-year housing investment programme which aims to set a minimum target to deliver 4,000 homes with 3,000 of

them as affordable homes to rent and set a minimum target to deliver 1,000 affordable homes to buy. Of significance, the Housing Investment Paper identifies that Cornwall is second only to Westminster for rough sleeping and recently this has even led to deaths on local streets. Between 1996 and 2008, average house prices quadrupled in Cornwall from £53,700 to £210,300, far out of the reach of those on average incomes. In parts of Cornwall there are London house prices and Cornish wages.

- 2.5 The proposals at Coyte Farm present a significant opportunity to assist in addressing the critical affordable housing need in Cornwall, and St Austell. As part of the proposed allocation at Coyte Farm 30% of the homes are to be affordable housing, both for affordable rent and shared ownership, in line with Cornwall Council planning policy. However, at present, the CSADPD fails to identify a sufficient number of sites to deliver Local Plan Policy 8 (Affordable Housing).

Spatial Policies

- 2.6 Policy 2 of the Local Plan sets out that strategic scale growth should be accommodated in main towns. As Policy 2a sets out a minimum number of dwellings to be provided. However, the CSADPD only apportions 2,900 homes to St Austell, which is based on the minimum Local Plan housing requirement, and as such the CSADPD is not in line with the Local Plan objective of directing housing growth to main towns, such as St Austell.
- 2.7 Cornwall Council published a "Chief Planning Officer's Advice Note: Infill/Rounding Off December 2017". In relation to main towns, such as St Austell, the note sets out that Cornwall Council's Housing Trajectory includes an expectation of small scale windfall development on unplanned sites. The NPPF allows Local Planning Authorities to make an allowance for windfall sites if they have compelling evidence that such sites have consistently become available in the local areas and will continue to provide a reliable source of supply (Paragraph 48, NPPF, 2012). The Advice Note provides helpful clarity on assessing the appropriate scale of windfall sites, stating that the decision-maker should consider the proposal in relation to the role and function of that place (LPSP Policies 2 and 3).
- 2.8 At the Cornwall Council Cabinet meeting on 16th March 2017 where the CSADPD was approved for Regulation 19 submission stage consultation and submitted to the Secretary of State, the following was discussed/agreed by Members (the Webcast of the meeting has been removed from Cornwall Council's website):

- the Council cannot stop anyone from submitting planning applications and when they do they have to be determined on their own merits. However, by supporting the Allocations DPD, it will help to give it increased weight, which will enable the Council to make greater use of it in the determination of planning applications; and
- for a major town such as St Austell, it was considered that a site of up to 150 homes could be considered without resubmitting the CSADPD.

2.9 St Austell is Cornwall's largest town and a key employment hub, as such larger windfall sites, such as Coyte Farm, are considered acceptable in line with Local Plan Policies 2 and 7, and the fact that it is unallocated should not exclude its consideration as an acceptable site for sustainable development.

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

2.10 As set out in more detail in our Position Statement to Matter 1, we consider the CSADPD to be unsound. Our assessment of Cornwall's housing trajectory concludes that Cornwall cannot demonstrate a five year land supply (5yIs). We reviewed Cornwall Council's Housing Trajectory 31st March 2017 which forms part of the evidence base for the CSADPD. We assessed progress and delivery of: sites in St Austell; and strategic sites of 100+ homes. Our assessment (see Figure 1 – 3 appended) found a discrepancy in the trajectory of 2,622 homes. Applying a 10% reduction on the remaining supply to account for delivery issues, we identify a supply of 4.2 years with a 20% buffer, or 4.8 years with a 5% buffer. As such, the CSADPD fails the test of being effective or positively prepared (Paragraph 182 of the NPPF), because it is not prepared based on a strategy which seeks to meet objectively assessed development requirements.

2.11 To comply with the NPPF and for an Inspector to find the Plan sound it needs to be able to deliver a 5yIs; and have sufficient flexibility to ensure it deliver the Local Plan Strategic Policies (2016) housing requirement of at least 52,500 homes are delivered over the plan period. The plan in its current form, does not do this and is, therefore, not sound. Unless the CSADPD allocates additional sites it will become out of date and at risk of challenge early on in the process. The CSADPD cannot be found to be consistent with the NPPF or based on an up-to-date objectively assessed need for housing in accordance with paragraph 47 of the NPPF.

3.0 COYTE FARM

- 3.1 We are promoting land at Coyte Farm, St Austell for around 300 homes as a new strategic allocation to the south west of St Austell, and for 150 homes in the more immediate term. A full planning application for 150 homes, of which 45 homes will be affordable (30%) and public open space has been drafted and is due to be submitted to Cornwall imminently (in March 2018).
- 3.2 Previous to this, we submitted an outline planning application (with all matters reserved except access) (Ref: PA16/141994) in December 2016 for 150 homes at Coyte Farm. The full planning application is largely the same as the previous outline submission, but provides more certainty to officers and Members at Cornwall Council that the site can make a meaningful contribution to housing delivery and affordable housing delivery, and provide further detail on how the site will be built out.
- 3.3 The forthcoming Coyte Farm application includes proposals for 150 high-quality spacious homes, with a mix of two, three and four-bedroom homes, in a sustainable location, well-served by the services, amenities and infrastructure of St Austell. Coyte Farm presents an opportunity to make an immediate and longer-term contribution to housing supply in Cornwall and to the critical need for affordable homes in St Austell.

The Surrounding Area

- 3.4 The Coyte Farm site is located south west of St Austell town centre. The site is bordered by the A390 to the north, disused quarries to the east and west, and hedgerows with agricultural land beyond to the south.
- 3.5 The site forms a natural extension to the west of St Austell, near to the facilities and services of the town. There are a number of local services and facilities that are located within a 2km and 5km catchment of the application site therefore, it is considered that walking/cycling presents a viable alternative for travel to the site than by car.
- 3.6 St Austell has a number of services and facilities consistent with a population of its size and nature. The distances to a range of services and facilities (taken from the centre of the site and provided as actual walking/cycle distances) as summarised in the table below.

<i>Service/Facility</i>	<i>Distance from site</i>	<i>Approximate journey time on foot ⁽¹⁾</i>	<i>Approximate journey time by bicycle ⁽²⁾</i>
<i>The Park Medical Centre</i>	<i>1,100m</i>	<i>14 minutes</i>	<i>3.5 minutes</i>
<i>St Mewan Community primary School</i>	<i>600m</i>	<i>8 minutes</i>	<i>2 minutes</i>
<i>Pondhu Primary School</i>	<i>650m</i>	<i>8 minutes</i>	<i>2 minutes</i>
<i>St Austell Library</i>	<i>2,000m</i>	<i>25.5 minutes</i>	<i>6 minutes</i>
<i>Poltair School</i>	<i>2,600m</i>	<i>33 Minutes</i>	<i>8 Minutes</i>
<i>Cornwall College – St Austell</i>	<i>3,000m</i>	<i>38.5 minutes</i>	<i>9.5 minutes</i>
<i>Cornwall Council Office</i>	<i>900m</i>	<i>11.5 minutes</i>	<i>3 minutes</i>
<i>West Hill Retail Centre</i>	<i>1,100m</i>	<i>14 minutes</i>	<i>3.5 minutes</i>
<i>Pentewan Road Retail Centre</i>	<i>1,200m</i>	<i>15 minutes</i>	<i>3.5 minutes</i>
<i>St Austell Town Centre</i>	<i>1,400m</i>	<i>18 minutes</i>	<i>4.5 minutes</i>
<i>Closet Bus Stop – Outside St Mewan School</i>	<i>400m</i>	<i>5 minutes</i>	<i>1 minute</i>
<i>St Austell Railway Station</i>	<i>1,500m</i>	<i>19 minutes</i>	<i>5 minutes</i>
<i>Western Inn</i>	<i>1,100m</i>	<i>14 minutes</i>	<i>3.5 minutes</i>
<i>St Austell Golf Club</i>	<i>1,800m</i>	<i>23 minutes</i>	<i>5.5 minutes</i>
<i>The Cornwall Hotel Spa</i>	<i>1,900m</i>	<i>24 minutes</i>	<i>6 minutes</i>
<i>Poltair Football Ground and Leisure Centre</i>	<i>2,300m</i>	<i>29.5 minutes</i>	<i>7 minutes</i>

3.7 Manual for Streets (paragraph 4.4.1) states that 'walkable neighbourhoods' are typically characterised by having a range of facilities within 10 minutes (up to 800m) walking distance of residential areas, which residents may access comfortably on foot.

3.8 Cycling has the potential to replace short car journeys for distances under 5km (3.1 miles) and could form part of linked trip using public transport. In addition, the site is immediately adjacent to the proposed Trewiddle Farm urban extension which has planning permission for 460 homes and retail development (ref: PA14/12161), and could therefore form a logical extension to the settlement in this location.

Outline Planning Application

3.9 An outline planning application was submitted to Cornwall Council in December 2016 and scheduled for determination at Strategic Planning Committee on 30th March 2017, but the application was eventually withdrawn on 29th March 2017 to enable further technical work

to be undertaken and consultation with the general public and council officers and Members. Further technical work was undertaken to address the comments in the draft officer's report to committee (30th March 2017), primarily in relation to air quality and transport. In the officer's report to committee the planning application was recommended for refusal, and four draft reasons for refusal set out, which principally related to a need for further technical work. In the table at Figure 4 we consider each of the four reasons for refusal, all of which we consider can be addressed.

Retail Planning Application

3.10 It is worth noting that the previous promoters of the land (Mercian Developments and Sainsbury's Supermarkets) submitted an outline planning application (PA12/10096) for the comprehensive re-development of both the site and a substantially larger area of land including land to the north of the A390 for a retail-led scheme comprising a Sainsbury's retail store, petrol filling station, shopping park, car village, public house and gold academy. Application PA12/10096 was recommended for approval by officers, but refused at committee by a margin of one single vote, in January 2014.

3.11 In summary, the officer's reason for recommending approval were:

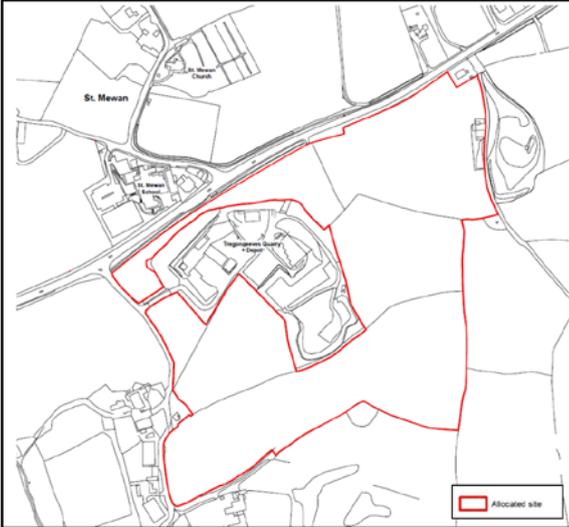
"The scheme promotes mixed use development, creating sustainable public benefit and so encourages multiple benefits for the proposed use of land whilst retaining open land to perform wildlife and flood risk mitigation functions."

3.12 The key reasons for the Planning Committee's refusal of the application related to landscape/visual impact and the historic environment; and principally related to the proposed development on land north of the A390 in the vicinity of St Mewan's Church (i.e. land not forming part of the currently proposed application site).

3.13 The current proposals which only relate to land south of the A390 has the potential to overcome all the previous reasons for refusal. On this basis, we consider that the principle of development on the site has been established through the officer's recommendation, demonstrating that all technical matters have the potential to be satisfactorily addressed.

4.0 PROPOSED ALLOCATION AT COYTE FARM

4.1 We are promoting the land at Coyte Farm for around 300 homes as a new strategic allocation to the south west of St. Austell, and have suggested suitable wording for the allocation below:

Policy STA-M3	Coyte Farm
Site area: 16.6 hectares	Allocation: Approximately 300 dwellings and 60-bed C2/C3 Care Home
	
<p>Additional Policy Requirements:</p> <ul style="list-style-type: none"> a) Residential development (to include 30% affordable housing) of around 300 dwellings in the Plan Period; b) Provision of a 60-bed care home (Use Class C2/C3); c) Preparation of a comprehensive Masterplan, through public consultation, and agreed by the Council, ensuring that development is well integrated within the south west quadrant of St. Austell; d) Development to provide 2 access points from the A390; e) Development to be delivered in a phased manner: <ul style="list-style-type: none"> • Phase 1: Up to 150 dwellings; • Phase 2: 50 - 100 dwellings including care home provision for older persons; • Phase 3: 50-100 dwellings, accessed from Tregongeeves Lane to deliver additional affordable, private and rented housing; f) 25% of the dwellings to be provided as 'accessible homes' and 5% as custom build; 	

- g) The creation of areas for local food production will be encouraged;
- h) Provision of on-site supporting community facilities to be provided (e.g. doctors and/or dental practice), subject to public consultation and site viability;
- i) Provision of formal and informal public open space;
- j) Proposals that protect the long-term use of Pondhu House and the St Austell Arts Theatre and that help integrate these community assets into the new neighbourhood will be encouraged;
- k) Protect and positively enhance biodiversity habitats and seek environmental and ecological gains through the provision of new planting;
- l) The creation of a network of green infrastructure that makes provision for a pedestrian connection to Higher Trehiddle will be supported;
- m) The provision of highway improvements along St Mewan Lane and increased parking capacity at St Mewan School will be encouraged.

4.2 The land is immediately available for development and can provide a strategic location for growth to meet the housing needs of St. Austell and Cornwall. Coyte Farm is located within a suitable and sustainable location for residential development to the south west of St Austell. A location that the CSADPD confirms as the main direction of growth for St. Austell. The site's allocation will ensure that the CSADPD is sufficiently flexible and positively prepared in line with paragraph 182 of the NPPF to deliver the minimum requirement of 2,900 homes in St. Austell and 52,500 homes across the plan period.

4.3 To establish a distribution strategy for new housing development across St Austell, Cornwall Council previously undertook public consultation, which led to the 2016 publication of the *'St Austell & Surrounding Parishes Town Framework.'* This document concluded that the south west of the town was the most sustainable location for new development and represented the main direction of growth for St Austell. The Town Framework states at para. 3.4.13:

"In assessing the appropriateness of all land immediately surrounding St Austell's urban area a preferred urban extension location to the south west of the town at Trehiddle was identified. This area was granted planning permission (PA14/12161) in 2015 for approximately 460 dwellings and will therefore represent the main direction of growth for the town."

4.4 Based on the Town Framework evidence base, the previous CSADPD identified that the southern-western quadrant of land at St Austell as the future direction of growth for the town, stating:

“St. Austell’s main direction of growth will be to its south west.”

4.5 Local Plan, Policy 3 *‘Role and Function of Places’* identifies where new development should be accommodated up to 2030. St Austell is considered as one of Cornwall’s ‘significant towns’ therefore it makes sense to allocate a larger apportionment of housing development at this location due to the affordable housing need, existing infrastructure and services available.

4.6 Given the site’s location in the south west quadrant of St Austell, we believe that development at Coyte Farm, therefore, represents the most logical and sustainable residential development option for St Austell, particularly as:

- the site offers the ability to help address the issue of affordable housing in the town and boost the town’s overall housing supply.
- It is located near to the town centre and local services planned at the adjacent Higher Trewhiddle Farm;
- It is well contained within the existing landscape; and forms a logical ‘rounding off’ to the settlement boundary.

4.7 On review of the St Austell and Parishes Housing Evidence Report, it demonstrates that housing at Coyte Farm would not have a detrimental impact on the surrounding environment. The Council’s Landscape Assessment assesses the site on landscape value, sensitivity of the landscape and the ability for change. Within each of these factors Coyte Farm specifically achieves an overall score of 7, which means that there is potential for development at this location with careful mitigation.

4.8 Furthermore, the Housing Evidence Report assesses the suitability of the Coyte Farm site as an urban extension; and identifying the site as Cell 28c, which confirms that the site is:

- not being visible from the town centre; and
- of lower grade, agricultural value

- 4.9 An extension to the Trewiddle development at Coyte Farm would represent a logical approach to meet St Austell's and Cornwall's housing need and would demonstrate good placemaking through the delivery of necessary infrastructure and services required for the town.
- 4.10 Coyte Farm is, therefore, the most logical residential development option for a new allocation at St Austell; and can address the issue of affordable housing for the local area and boost the overall housing supply across the plan period.

5.0 CONCLUSION

5.1 An allocation at Coyte Farm site presents an opportunity to make a significant contribution to local infrastructure and services, including key improvements to transport infrastructure, as summarised below:

- Provision of vehicular access to the site along the northern boundary onto the A390 - Truro Road.
- Pedestrian/cycle access along the northern frontage of the site through the proposed vehicular access point onto the A390 – Truro Road, as well as separate pedestrian access point located approximately 150m to the west of the proposed access point, which will be utilised as the primary non-motor vehicle access.
- If the Trehiddle development (adjacent to the east of application site) is not delivered, our client will provide a pedestrian crossing point in the form of a refuge island, which will link to existing footway on the northern carriageway edge of the A390 Truro Road.
- A pedestrian route is proposed to extend east to west through the centre of the site from the Trehiddle development to the existing PRoW, located at the north-western corner of the site.
- Internal highway design within the site which has been designed to provide for all road users. This will aid in increasing accessibility and promoting sustainability to the site.
- It is considered that there are ample opportunities for residents and visitors accessing the application site to be able to travel by sustainable modes of transport.

5.2 In addition to the above, allocating the site could deliver:

- 30% affordable housing (up to 45 affordable dwellings);
- 25% accessible homes;
- Provision of on-site public open space and off-site contribution towards the improvements of outdoor pitches at St Austell Rugby Club;
- A financial contribution towards the expansion of the Sandy Hill Academy.

5.3 This Statement sets out the case for an additional housing allocation of 300 homes at Coyte Farm, St. Austell and demonstrates that:

1. As drafted, the CSADPD contains insufficient housing allocations to achieve the Local Plan's housing requirement and the Plan is, therefore, unsound in accordance with paragraph 47 and 182 of the NPPF;
2. Additional housing allocations are, therefore, required to ensure sufficient choice and flexibility of new homes; and offering an opportunity to compensate for delays in the delivery of those sites currently identified in the CSADPD.
3. New housing should be allocated on land in the most sustainable locations. The most sustainable location is confirmed as land to the south west of St. Austell and at Coyte Farm, which the Site Allocation DPD identifies as an area of growth for the town;
4. There are significant benefits of allocating land at Coyte Farm in terms of the provision of much needed affordable homes, support for local infrastructure; and not least, ensuring that sufficient homes are allocated to enable the Site Allocation DPD to deliver the housing requirement for the Local Plan and to ensure the maintenance of a five-year housing land supply is more likely to be achieved.

5.4 To ensure the CSADPD can be found sound, the following needs to be considered:

- The Council needs to be proactive in its delivery of new homes, particularly as the Local Plan housing requirement of 52,500 homes is a minimum figure not a ceiling. Previous housing delivery rates indicate that Cornwall Council has a history of under-delivery, and the Council will need to allocate a sufficient number of sites if they are to deliver the Local Plan housing requirement and maintain a five-year land supply.
- Our own assessment of the Council's land supply results in a supply of 4.2 years. Additional land at Coyte Farm would help ensure that a 5yls can be maintained.

FIGURE 1

**BARTON WILLMORE'S ASSESSMENT OF
CORNWALL'S 5-YEAR LAND SUPPLY**

Figure 1 – Barton Willmore’s Assessment of Cornwall’s 5-year Land Supply

Requirement		Calculation	5% Buffer	20% Buffer
A	Annual Requirement		2,625	2,625
B	Identified Shortfall	Cornwall Council’s identified shortfall	1,310	1,310
		Unlawful dwellings identified by Cornwall Council	-235	-235
	(1,310 - 235)	Total	1,075	1,075
C	5-year requirement	(A x 5) + B	14,200	14,200
D	Buffer	C x Buffer	710	2,840
E	5-year requirement including buffer	C + D	14,910	17,040
F	Revised annual requirement including buffer	E / 5	2,982	3,408
G	Supply	Council’s Supply (2017-2022) = 18,572 Barton Willmore Supply (2017-2022) = 15,950 Minus an additional 10% buffer = 14,355		
H	5-year land supply position	G / F	4.8	4.2

FIGURE 2

TABLE OF DISPUTED SITES

FIGURE 2 TABLE OF DISPUTED SITES – ASSESSMENT OF CORNWALL HOUSING TRAJECTORY TO 31ST MARCH 2017 & LAND OFF MOUNTSIDE ROAD, PAR APPEAL (REF: APP/D0840/W/16/3162355) SUBMITTED EVIDENCE “TABLE OF DISPUTED SITES.”

Review of sites: in St Austell, and sites over 100 homes

Site	5yls	17 / 18	18 / 19	19 / 20	20 / 21	21 / 22	Discrepancies: trajectory / site capacity	Comment
ST AUSTELL SITES								
Higher Trehiddle Farm, St Austell PA14/12161 Outline for 460 homes 27/07/17	BW	0	0	0	0	20	35	<ul style="list-style-type: none"> One condition discharged. No reserved matters progressed. 2020 start unrealistic, 2021/2022 more realistic given no RM progressed and housebuilder not secured.
	LPA				20	35		
Carlyon Bay, St Austell PA14/10875 RM pursuant to PA11/01331 for 511 homes 23/02/15	BW					0	35	<ul style="list-style-type: none"> One other RM approved 27/08/17, no conditions progressed. Whole site in question.
	LPA					35		

Site	5yrs	17 / 18	18 / 19	19 / 20	20 / 21	21 / 22	Discrepancies: trajectory / site capacity	Comment
Land at Holmbush Rd, St Austell PA13/09195 SHLAA ref S454 (whole site) Outline for 190 homes 10/06/15	BW			30	30	30	23	<ul style="list-style-type: none"> One condition discharged. No reserved matters submitted. As such start 2019/2020 more realistic. 35 dpa unrealistic. Therefore a reduction to industry standard for site of this size and type to 30 dpa 2019 – 2024 (minus 25) (see Figure 3 - Standard industry lead in times and build rates).
	LPA		8	35	35	35		
Land at the corner of Tregorrick Road and Porthpean Road, St Austell PA14/01101 Full for 131 homes 20/02/2015 - PA15/11368 reduced to 101 homes	BW	0	16	16	16	17	36	<ul style="list-style-type: none"> The online planning records indicate that planning conditions remain to be discharged, so completion of 21 homes 2018/2019 is unlikely
	LPA	0	21	35	35	10		
	LPA	0	0	0	0	0		
Duporth Holiday Village, St Austell C2/09/01152 Outline for 48 homes 16/12/10	BW	0	0	0	0	0	48	<ul style="list-style-type: none"> Trajectory assumes 39 to be constructed 2017/2018, but no evidence of this. Midas Homes
	LPA	39	9	0	0	0		

Site	5yrs	17 / 18	18 / 19	19 / 20	20 / 21	21 / 22	Discrepancies: trajectory / site capacity	Comment
Western National Ltd, Eliot Road Full for 30 homes PA14/06870	BW						30	<ul style="list-style-type: none"> No conditions discharged or planning activity since 2014 - permission expires in May 2018
	LPA	13	17					

Site	5yrs	17 / 18	18 / 19	19 / 20	20 / 21	21 / 22	Discrepancies: trajectory / site capacity	Comment
STRATEGIC SITES								
Land south of Priory Road, Bodmin Outline consent granted for 572 dwellings (to the south) and 178 dwellings to the north of Priory Road in June 2016 (PA12/12115)	BW	0	0	10	35	35	77	<ul style="list-style-type: none"> • RM application submitted Oct 2017 for 178 dwellings (Phase 1 - PA17/09582) • Assumed determination date – April 2018 • Based on a decision in April 2018 – delivery in Oct 2019 (1.5 years) • 2.5 dwellings per month (30 dwellings a year)
	LPA	0	0	17	70	70		
Land At Tuckingmill/Church View Farm Camborne Outline consent granted for 296 homes August 2012 (PA10/08671)	BW	0	0	10	35	35	22	<ul style="list-style-type: none"> • RM application submitted April 2017 still awaiting decision (PA17/04068) • Assume decision in April 2018 • Delivery – October 2019 (1.5 years) • 2.5 dwellings per month as per build rates in standard industry table
	LPA	0	0	35	35	35		
Land At Tolgus Tolgus Redruth Outline consent granted May 2013 for 370 dwellings (PA12/09717)	BW	0	0	30	50	50	57	<ul style="list-style-type: none"> • RM consent for 370 dwellings issued July 2016 • Based on industry timescales delivery start in February 2018 • Reduced delivery in line with industry lead in times
	LPA	0	0	47	70	70		

Site	5yrs	17 / 18	18 / 19	19 / 20	20 / 21	21 / 22	Discrepancies: trajectory / site capacity	Comment
Redruth Brewery/Plumbase Foundry Row Chapel Street Redruth Outline consent granted March 2015 for 160 dwellings (PA13/07918)	BW	0	17	35	35	35	35	<ul style="list-style-type: none"> • RM application required to be submitted by March 2018 • No RM application submitted to date but dwellings to be delivered in 2018/2019
	LPA	0	0	17	35	35		
Langarth Farm, Three Milestone, Turo Outline Consent granted July 2013 for 1500 dwellings (PA11/06124)	BW	0	0	50	50	50	124	<ul style="list-style-type: none"> • Reserved Matters consent granted for 494 dwellings in October 2016 (PA15/11489) • Condition discharge for conditions 8,11,12, 14 & 30 of outline consent (Approved 2017) • 8, 12 & 30 not discharged – require further info • NMA approved July 2016 in relation to condition 2 to extend the permission - Application for approval of the first of the reserved matters shall be made to the local planning authority before the expiration of 3 years from the date of this permission. An application for approval of the final reserved matters shall be made before the expiration of thirteen years from the date of this permission (10 July 2026). Is this lawful?

POSITION STATEMENT

Figures

	LPA	0	64	70	70	70		<ul style="list-style-type: none"> • Condition 5- Mini Design Code and Parameter Plan required for each phase before submission – none submitted • Not clear whether there is a developer on board • News article suggest that the Council are aiming to start on site in 2018 http://www.cornwalllive.com/news/cornwall-news/stadium-housing-cornwall-langarth-truro-770069 • Based on industry timescales delivery would start in April 2018 (1.5 years from RM consent) but given the uncertainty over developer etc evidenced by the news article I have pushed out delivery for another year to April 2019 • Reduced build out rates to 50 a year as per build rates in standard industry table
Land at Maiden Green off A390 Kenwyn	BW	0	0	0	50	50	45	<ul style="list-style-type: none"> • Hybrid planning application comprising outline for 515 dwellings, school, shop, district centre etc. (PA14/00703) Approved August 2016 • No RM application submitted. • Based on industry lead in times (2.5 years) February 2019 for first delivery. No reason to query lead in time • Reduced delivery rates based on 50 a year
	LPA	0	0	5	40	70		

Site	5yrs	17 / 18	18 / 19	19 / 20	20 / 21	21 / 22	Discrepancies: trajectory / site capacity	Comment
Land at West Carclaze and Baal Carludon Outline application for 1500 still pending. Submitted Jan 2015 (PA14/12186)	BW	0	0	8	50	50	107	<ul style="list-style-type: none"> • Not likely that 15 homes will be delivered in 2018/2019 or 2019/2020 given that the consent hasn't been issued, conditions haven't been discharged and no RM application submitted • Assumption on decision date – August 2018? • First delivery Feb 2021 • Reduced build out rates to 50 as per standard industry build rates
	LPA	0	15	60	70	70		
Land At Broadmoor Farm Stoketon Cornwall Hybrid application comprising for up to 1000 units granted in October 2017 (PA14/02447)	BW	0	0	0	50	50	100	<ul style="list-style-type: none"> • Based on industry lead in times first delivery April 2020
	LPA	0	0	0	100	100		

Site	5yrs	17 / 18	18 / 19	19 / 20	20 / 21	21 / 22	Discrepancies: trajectory / site capacity	Comment
Land at Chapel Gover Newquay Growth Area Outline application for 800 dwellings still pending. Application submitted May 2015. Decision still pending.	BW	0	0	0	12	50	31	<ul style="list-style-type: none"> • Further PPA signed until March 2018 • Assume decision – August 2018 • First delivery Feb 2021
LPA	0	0	0	23	70			
Tolgarrick Farm, Green Lane, Truro (Barton Willmore) Outline for 320 homes PA12/07283 at appeal 20/12/12 and; RM PA14/02023 14/03/14	BW				50	50	140	<ul style="list-style-type: none"> • Planning Permission for 320 homes. • 10 x conditions discharged, but no submissions since 2014. • Various NMA and RM submissions.
LPA	40	50	50	50	50			
Tuckingmill, Cambourne (PA10/08671) Outline for 296 Homes 17/08/12	BW				25	50	27	<ul style="list-style-type: none"> • Stalled site for 5 years – no conditions submitted. • Reserved matters validated in April 2017 and awaiting decision.
LPA			32	35	35			

Site	5yrs	17 / 18	18 / 19	19 / 20	20 / 21	21 / 22	Discrepancies: trajectory / site capacity	Comment
Hayle Harbour (W1/08-0613) Outline pp for 819 homes 29/06/10	BW					50	200	<ul style="list-style-type: none"> No reserved matters approved. PPA submitted in relation to RM for 181 homes still pending and key milestone dates provided by applicant are now out of date.
	LPA		40	70	70	70		
Broadmoor Urban Extension, Saltash (PA14/02447) Outline pp for 1,000 homes 20/11/15	BW				50	50	100	<ul style="list-style-type: none"> No activity since pp was granted No conditions or RM submitted S106 agreed Oct 2017
	LPA				100	100		
Land at Maiden Green (PA14/00703) Hybrid pp for 515 homes	BW				50	50	45	<ul style="list-style-type: none"> No conditions discharged, No RM submitted. Trajectory states it is a full pp, when it is hybrid with only the access in detail.
	LPA			5	70	70		
Land between A390, Park and Ride and Willow Green Farm (PA12/11527) Outline pp for 93 homes 21/03/13 RM app PA16/02385	BW			30	30	30	3	<ul style="list-style-type: none"> Layout RM approved in January 2017 The Council's comments on the site state: <i>"The Council accept that although a valid planning permission exists on the site, an appeal has been allowed for retail use on the site in October 2016 and so, this casts considerable doubt that the housing will be delivered."</i>
	LPA		30	30	30	3		

Site	5yrs	17 / 18	18 / 19	19 / 20	20 / 21	21 / 22	Discrepancies: trajectory / site capacity	Comment
Joannies Avenue St Ives (PA15/08967) Outline pp for 165 homes 07/03/16	BW				0	0	70	<ul style="list-style-type: none"> Application and Appeal were Withdrawn in April 2017 therefore there is no ongoing application. The Council's comments on the site state: <i>"The Council considers the site suitable on the basis that it resolved to approve the planning application despite it being called in by the Secretary of State. However, until the decision is known the Council accept that the yield from this site should be excluded."</i>
	LPA				35	35		
Maiden Green Farm Truro (PA14/00703) Outline pp for 515 homes 11/08/16	BW				50	50	156	<ul style="list-style-type: none"> No conditions discharged. The Council's comments on the site state: <i>"The Council maintain that it is expected that more than one developer will be expected to deliver the site however whilst the delivery reflects the application of average lead in times and delivery rates the Council accepts the appellants estimate that 70 dwellings could be delivered by 2021 rather than the 186."</i>
	LPA	0	46	70	70	70		
Land East of Quintrell Rd Newquay (PA14/09346) Outline pp for 180 homes 11/05/17	BW				30	30	27	<ul style="list-style-type: none"> Outline permission granted in May 2017. No RM or conditions approved. The Appellant's comments on the site state: <i>"At the time of writing there is no decision and the Section 106 remains outstanding some 1.5 years after the resolution to grant. I discount 10 dwellings as these 10 dwellings were assumed with a S106 being completed by September 2016 which is not the case and it therefore should be pushed back to beyond 5 years."</i> The Council's comments on the site state:
	LPA			17	35	35		

									<p><i>"Mr Harris discounts 10 dwellings on the basis that the S106 agreement has not yet been signed. It is accepted that if the average lead in time is now applied to the site it would exclude these 10 dwellings."</i></p>
<p>Sunnyside, Merritts Hill, Illogan (PA13/08793)</p> <p>Outline pp for 20 homes 25/06/14</p>	BW				3		10	<ul style="list-style-type: none"> • Permission granted June 2014. • The Council's comments on the site state: <p><i>"The officers report recognises that there has been a reduction in the site size that has brought it below the affordable housing requirement but considered that it could not sustain a reason for refusal on this matter. Whilst the site could still deliver 20 units it is considered that when applying the average lead in time and delivery rate to the new permission that the yield should be reduced by 10 units."</i></p> 	
	LPA				3	7			
<p>Royal British Legion, Cambourne (PA14/05937)</p> <p>Full PP for 10 homes 15/12/14</p>	BW	0	0	0	0	0	10	<ul style="list-style-type: none"> • Following the appeal decision, the Council accept that this site is probably not deliverable. • LPA have 10 units to be delivered in 2022-23. 	
	LPA	0	0	0	0	0			
	LPA	20							
<p>Brigantine Lower Market Street, Penryn (PA13/03592)</p> <p>Full pp for 11 homes</p>	BW	0					11	<ul style="list-style-type: none"> • The Council's comments on the site state: <p><i>"This site expired in July 2016 and has already been deducted from the Councils supply figure see Appendix 18 of MC proof"</i></p> 	
	LPA	11							

Land North West of Bodmin Hospital (DP/14/2005HLA) (PA14/07891) RM for 115 homes 30/06/17	BW			30	30	30	85	<ul style="list-style-type: none"> Permission approved in June 2017 for the re-plan of "RM, for 115 homes, reducing 18 units from the overall scheme – no conditions submitted yet
	LPA	35	35	35	35	35		
HX1 Helston Urban Extension Land west of Trewennack, Helston (PA16/09129) RM – 450 units	BW				50	50	31	<ul style="list-style-type: none"> Reserved Matters Application was granted on 9th December 2016. No conditions submitted yet.
	LPA		26	35	35	35		
Land south east of Pennygillam Industrial Estate Slate Quarry Hill, Launceston (PA16/09268) OL – 275 units	BW				50	50	72	<ul style="list-style-type: none"> Reserved Matters Application for 259 units was submitted in October 2016 RM application has not yet been decided.
	LPA	32	35	35	35	35		

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Land at Trevithick Manor Farm, Trevemper, Newquay (PA14/04743) OL – 455 units	BW				50	50	162	<ul style="list-style-type: none"> Outline permission for 455 units (some matters reserved, access to be decided) was approved on 14th March 2017. RM application has yet to be submitted.
	LPA		37	75	75	75		
Land at Quintrell Road, Newquay (PA13/08874) RM - 297 units	BW				25	50	178	<ul style="list-style-type: none"> Reserved Matters Application was granted on 19th February 2015 – no conditions submitted yet. (3 NMA applications submitted- 2 approved, 1 refused.)
	LPA	50	48	62	64	29		
	LPA			10	30	30		
Land off West Road, Quintrell Downs OL – PA16/12055 (140 units) Appeal: APP/D0840/W/17/3 177729	BW						100	<ul style="list-style-type: none"> Outline Application for 140 units was refused by Council in April 2017. Appeal was then allowed in December 2017 for 140 dwellings. No RM has been submitted yet.
	LPA				50	50		
St Lawrence's Hospital, Bodmin OL - PA16/08465 (175 homes)	BW			5			40	<ul style="list-style-type: none"> RM approved – March 2017 Discharge of one condition – submitted Nov 2017 – still awaiting decision.
	LPA		35	35				

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Boiler Works Road, Cambourne Full – PA16/10866 170 units	BW						25	<ul style="list-style-type: none"> Proposed amendment to Outline application – approved Nov 2016. Variation of one Condition – approved June 2017.
	LPA		20	5				
Land off A390 St Anne Chapel, Calstock Outline – PA1603999 141 units	BW			5			21	<ul style="list-style-type: none"> Reserved matters approved- April 2017 Submission of discharge of 5 conditions – Dec 2017 – awaiting decision.
	LPA		14	35				
Land at Kergillack farm, Budock Outline – PA15/03533 300 units	BW	20	20				40	<ul style="list-style-type: none"> RM – Approved April 2015 Discharge of conditions – approved Nov 2015
	LPA	50	50					
Land to North of Viaduct Hill, Hayle Full – PA16/00501 138 units	BW			5			77	<ul style="list-style-type: none"> NMA approved June 2017 NMA approved August 2017 Deed of modification approved May 2017
	LPA	32	35	35				
Land north of Upper Chapel, Launceston Outline – PA14/08184	BW						52	<ul style="list-style-type: none"> RM submitted October 2017- awaiting decision.
	LPA		17	35				

140 units								
Land at Addington, Liskeard	BW			45	45	15	45	<ul style="list-style-type: none"> • RM approved - January 2017 • RM 5 conditions approved - April 2017
Outline – PA16/07313 450 units	LPA		45	45	45	15		
Looe Comprehensive School	BW		15				45	<ul style="list-style-type: none"> • NMA approved - Oct 2017 • No conditions discharged.
Outline – PA10/03413	LPA	30	30					
Trevithick Manor Farm, Newquay	BW						45	<ul style="list-style-type: none"> • RM approved – July 2015 • No conditions discharged • Variation of condition 1 approved – May 2016
Full – PA15/02185 359 units	LPA	45						
Overall Total							2,622	

FIGURE 3

STANDARD INDUSTRY LEAD IN TIMES AND BUILD RATES

Figure 3

Standard industry lead in times and build rates					
Site Status		Site Size/Number of Homes			Notes
		Less than 50 homes	50 to 200 homes	200 plus homes	
Under construction	Lead in time	N/A	N/A	N/A	Build rate applied to residual capacity
	Build rate (per annum)	15 homes	30 homes	50 homes	
Full planning Permission/ Reserved Matters	Lead in time	1 year	1.5 years	2 years	Lead in time to allow for infrastructure provision and construction start up.
	Build rate (per annum)	15 homes	30 homes	50 homes	
Outline Planning Permission	Lead in time	1.5 years	2 years	2.5 years	Lead in time to allow for full permission / reserved matters, infrastructure provision and construction start up.
	Build rate (per annum)	15 homes	30 homes	50 homes	
Sites without Permission	Lead in time	2.5 years	3 years	3.5 years	Lead in time to allow for planning permission, infrastructure provision and construction start up.
	Build rate (per annum)	15 homes	30 homes	50 homes	

FIGURE 4

COYTE FARM DRAFT REASONS FOR REFUSAL

Figure 4: Coyte Farm draft reasons for refusal to PA16/141994 from officer's report to committee (30th March 2017)

Draft Reason for refusal	Our response
<p>1 – Policy 3 (Role and Function of Places) of the Cornwall Local Plan 2016 states that the delivery of growth in main towns will be managed through site allocations in order to ensure that growth is genuinely planned. The application site is not an allocated site for development.</p>	<p>Cornwall Council should not be dismissing sustainable application sites on the basis that they are not allocated in the CSADPD. As evidenced in the Quintrell Downs appeal (Ref: APP/D0840/W/17/3177729 and PA16/12055), the Inspector concluded that although the proposal would not be in accordance with Local Plan Policy 3 as it would represent development which is not managed through the Site Allocations DPD, it would comply with Policy 2 in that it would represent strategic scale growth accommodated in a main town.</p>
<p>Reason for refusal 2 –Air Quality Impact and transport</p>	<p>Further technical work has been undertaken to address the comments in the draft officer's report to committee (30th March 2017), primarily in relation to air quality and transport and access, and this is addressed with this application submission.</p> <p>The development would not have a material detrimental impact upon the operation and functioning of the local highway network, the application site is situated in a location that would give rise to residents and visitors being able to walk, cycle and use public transport to travel to and from the site.</p> <p>The air quality assessment has predicted a negligible impact on local NO₂ and PM₁₀ concentrations and has predicted concentrations considerably below the relevant objective limits across the Application Site. The assessment has also concluded that future occupants of the Site would not be exposed to pollutant concentrations above the relevant objective limits or be affected by odour or dust emissions from the adjacent landfill and recycling depot, therefore the impact of the proposed development with regards new exposure to air quality is considered to be negligible. Impacts on local</p>

Draft Reason for refusal	Our response
	air quality during operation of the completed development would also be negligible.
Reason for refusal 3 – standard Section 106 reason	This would be addressed through a Section 106 Agreement, and the imminent submission of a full planning application at Coyte Farm will provide further certainty on Section 106 obligations.
Reason for refusal 4 – no overriding public interest for the scheme. The submitted application is considered to be contrary to Policy 23(3.d) of the Cornwall Local Plan (Natural Environment – Biodiversity and Geodiversity) and the Conservation of Habitats and Species Regulations 2010.	The draft Ecology Report and surveys prepared for the draft full planning application at Coyte Farm conclude that the site is generally of low value for wildlife with the exception of bats, and includes mitigation measures for bats, and for other ecology on the site, and the proposed ecological mitigation has fed into the design of the application.
Reason for refusal 5 – noise impact	An updated noise report has been undertaken which includes further survey work, which responds to comments provided on the previous outline application at Coyte Farm. The Noise Report concludes that any noise impact can be managed by a carefully designed scheme and mitigation.