



Position Statement on behalf of Wainhomes (South West) Holdings Ltd (ID: 192)

In relation to: Matter 9 – Bodmin Spatial Strategy and
Allocations

Wainhomes (South West) Holdings Ltd

Project : 6412
Hearing : Matter 9 - Bodmin
Client : Wainhomes (South West)
Holdings Ltd
Date : February 2018
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1. Introduction

- 1.1 Emery Planning is instructed by Wainhomes (South West) Holdings Ltd (hereafter referred to as 'Wainhomes') to attend the examination into the soundness of the Cornwall Site Allocations DPD on their behalf.
- 1.2 Wainhomes is a key developer within Cornwall and will continue to be an important delivery partner for the Council in meeting its open market and affordable housing needs during the plan period. Their landholdings and developments can also facilitate further mixed use development including employment and social infrastructure. Wainhomes made representations to, and appeared at the examination of, the Local Plan: Strategic Policies (LPSP).
- 1.3 This statement summarises our client's position in response to the Inspector's schedule of Matters and Issues (INSP.S4), specifically the questions under Matter 9: Bodmin Spatial Strategy and Allocations. It should be read in conjunction with our detailed representations to the Submission Version of the plan (ID: 192), and our other Position Statements submitted to this examination.
- 1.4 Wainhomes controls the majority of the proposed allocation Bd-UE2: Halgavor. A plan showing land under their control was appended to their representations to the Submission Version (ID: 192). Wainhomes is actively working with the Council in order to bring the site forward, and a pre-application meeting with the Council took place in January 2018.
- 1.5 Wainhomes is also promoting omission sites within Bodmin which could contribute to addressing any housing land supply shortfall identified through this examination, or indeed in the future. Further details are set out within our representations to the Submission Version of the plan.

2. Response to General Issues

a. Is the Strategy for Bodmin consistent with the LPSP?

- 2.1 Yes. However we have concerns as to whether sufficient housing land is allocated in order to meet the housing requirement, as detailed further below.

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

- 2.2 The Council's housing trajectory (E7.2) anticipates 717 dwellings being delivered at the land south of Priory Road, with the first dwellings delivered in 2019/20. The outline application was submitted at the end of 2012, and approved in June 2016. A reserved matters application in relation to part of the site for 178 dwellings has been submitted by Persimmon Homes, and remains undetermined. The remainder of the site could accommodate another developer, but we are not aware as to whether another developer is actually involved with the site, and no further reserved matters applications have been submitted. We therefore consider that there is a level of uncertainty regarding the delivery of this site, and a more cautious approach should be taken in relation to its delivery.

c. Is the approach to the selection of sites for allocation consistent with the LPSP and appropriate, including in respect of the use of previously developed land (brownfield) and greenfield land?

- 2.3 Yes. The LPSP does not set a specific target for previously developed land in Bodmin. However the land supply from existing permissions and windfall sites has been assessed and the supply has not been under-estimated. There is a need to allocate greenfield sites on the edge of Bodmin, and such an approach fully accords with the LPSP.
- 2.4 Specifically in relation to our client's site (the Halgavor Urban Extension), the allocation is justified by the evidence base, in particular the Bodmin Town Framework: Housing Assessment report (D7.1). Although we do not agree with all elements of the report (for example the landscape assessment of omission sites that we are promoting) the steps undertaken demonstrate an iterative process which considers relevant planning considerations at each stage.

d. Is the level of housing and retail development proposed for Bodmin via the SADPD justified with reference to the requirements of the LPSP?

- 2.5 Including the draft allocations and what the trajectory indicates that they can deliver up to 2030, the CSADPD plans for a supply of just 3,207 dwellings against a minimum requirement of 3,100. This would provide a flexibility factor of just 107 dwellings, equating to 3%. We consider that this provides insufficient flexibility to respond to changing circumstances, i.e. slippage in the delivery of housing from strategic sites, as required by the Framework.
- 2.6 The supply for Bodmin already includes reasonable allowances in terms of small site windfalls of less than 10 dwellings, and other urban capacity from the SHLAA of more than 10 dwellings. Consequently there are no other potential sources of flexibility available to the settlement, other than site allocations. If there is any slippage in any element of the supply, a shortfall against the requirement for Bodmin is almost inevitable.
- 2.7 We have recommended that at least 20% flexibility is provided in to give the plan a realistic prospect of meeting the minimum requirement. This would require allocation of additional sites through the CSADPD.

3. Bd-UE2: Halgavor Urban Extension

e. Are the individual allocations and proposed land uses suitable, having regard to planning and environmental constraints, including air quality and flood risk?

- 3.1 The allocation of the site is strongly supported. The allocation is justified by the evidence base, in particular the Bodmin Town Framework: Housing Assessment report (D7.1). The stream and tree belt provide a strong boundary to the south of the site, and this justifies the reduction of cell 8 to create UE2 as shown at figure 9 of the report.
- 3.2 The allocation (Bd-UE2) sits within the context of adjacent residential development to the north and would not be visually prominent. The land falls outside of the view corridor of Bodmin Beacon as shown on the Bodmin Strategy map. The western side of the allocation has been limited to Halgavor Road which also in plan terms keeps the development from extending into the undeveloped southern area. On the southern edge of the Beacon there are panoramic

views out to the south from the high plateau towards the surrounding hills at Penvivian Down and Bokiddick Downs. However the allocation is hidden from view due to the nature of the falling topography (see our representations to the Submission Version (ID: 192), appendix EP8, View 1 on Plan 11065/P05).

- 3.3 In terms of the specific requirements of Policy Bd-UE2, paragraph h) states that planning permission for the development of only part of the site will not be granted, unless it is in accordance with a masterplan / concept plan for the entire site. Wainhomes is actively working with the Council in order to bring the site forward, and a pre-application meeting with the Council took place in January 2018 to discuss the principles for an application and its relationship with the wider site. The discussions were positive and Wainhomes will be moving forward with a planning application later this year. We will provide a verbal update at the hearing session.

f. Is there robust evidence to demonstrate that allocations and infrastructure would be delivered at a sufficient rate and suitable timescale to meet the minimum numerical development requirements for the town, including with reference to the five year housing land supply required by national policy?

- 3.4 The majority of the site is controlled by Wainhomes, and is considered to be deliverable within the timescales set out within the CSADPD. A plan showing land under their control was appended to their representations to the Submission Version. The remaining land is owned by Cornwall Council. Wainhomes is actively working with the Council in order to bring the site forward, and a pre-application meeting with the Council took place in January 2018.

g. Is allocation Bd-UE2 justified with reference to its potential effect on the natural qualities of Halgavor Moor?

- 3.5 The presence of Halgavor Moor has been accounted for within the Council's evidence base, and is specifically referenced within the Bodmin Town Framework: Housing Assessment report (D7.1). However the land is not subject to any special environmental designation and there are no significant constraints to the proposed allocation.
- 3.6 We note that the percentage of developable land has been reduced to reflect the Council's initial assessment of the hydrological conditions on the site. This is likely to significantly increase

the quantum of green infrastructure across the site, which would also contribute towards any necessary landscape or ecological mitigation.

- 3.7 Our client has commissioned an initial ecological walkover survey to identify the need for further surveys. Whilst a number of additional surveys are required and will be undertaken during the correct survey season later this year, this is not unusual on a greenfield site and no significant concerns were raised by the appointed consultant. We would be happy to provide further information in this regard at the request of the Inspectors.

4. Omission sites

- 4.1 The Inspectors have made it clear that omission sites will not be considered through this examination. Nevertheless, we have highlighted that there is insufficient land allocated for housing in Bodmin. In our representations to the Submission Version we have put forward omission sites in Bodmin which are deliverable, and could make a valuable contribution to boosting the housing land supply. These sites could be allocated through main modifications.