

Position Statement

Cornwall Site Allocations DPD
Examination

Matter 9

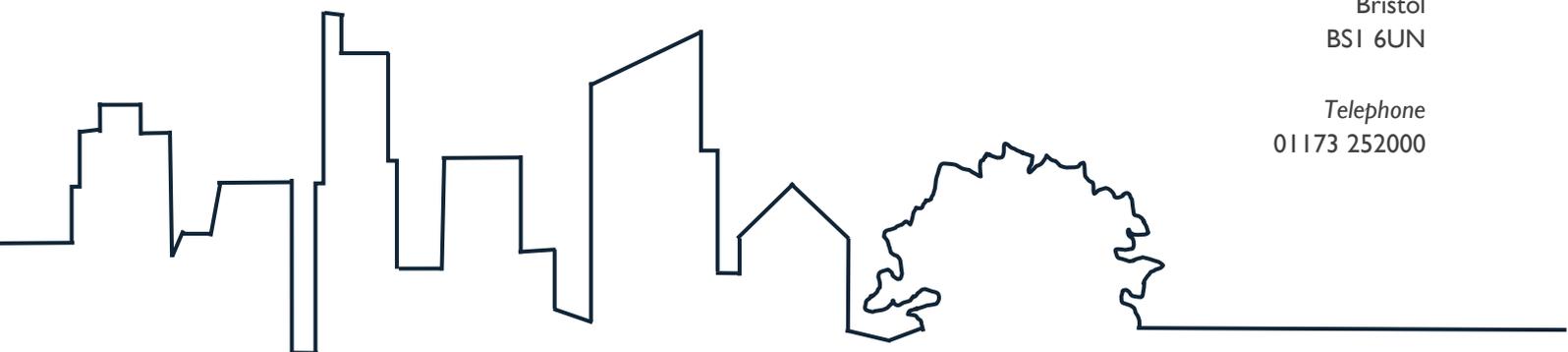
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I INTRODUCTION

- I.1.1 This Position Statement has been prepared by Walsingham Planning Ltd on behalf of Bodmin LVA LLP (LVA) and relates to the Cornwall Site Allocations DPD (SADPD) Examination. Walsingham Planning previously submitted representations in relation to the Regulation 19 consultation, and comments were submitted by Louis Chicot Associates Ltd on behalf of the Landowner in relation to earlier stages of the process including the SADPD preferred options consultation in September 2016.
- I.1.2 LVA has a specific interest in relation to Land southwest of Westheath Road, Bodmin (SHLAA 2016 Ref: North Cornwall_6) as edged red on the site location plan attached to our Regulation 19 representations. It is recognised that the LVA site is not a specific matter for the Examination but reference to it is included to explain the context of the LVA proposals. A number of appendices were submitted with our Regulation 19 representations including a Promotional Document (which included a concept masterplan) and the following technical assessments:
- Initial Visual Appraisal;
 - Phase I Ecology Appraisal;
 - Highways and Traffic Appraisal;
 - Heritage Impact Assessment;
 - Phase I Contaminated Land Desk Study and Walkover.
- I.1.3 In addition to the above assessments, all Phase 2 ecology surveys have now been completed on site.
- I.1.4 This Statement addresses matters identified by the Inspectors in the Detailed Programme of Hearings (INSP.S7) where considered relevant and highlights issues which are still considered to be of concern in relation to the soundness of the plan.
- I.1.5 We note that since the Regulation 19 consultation, a number of responses have been provided by the Council (including appendices) to the questions raised by the Inspectors (references: CC.S1, CC.S3, CC.S4). The Council have also provided responses to the Regulation 19 representations submitted in a number of officer

comment documents, including for Bodmin (no reference number). Reference is made to these documents where relevant.

2 MATTER 9: BODMIN SPATIAL STRATEGY AND ALLOCATIONS

2.1 General Issues

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

2.1.1 LVA consider the strategy for Bodmin is in general accordance with the adopted Cornwall LPSP but would raise the following comments.

The adopted Cornwall LPSP

2.1.2 Policy 1 of the LPSP sets out the overarching presumption in favour of sustainable development as reflected in the National Planning Policy Framework (NPPF). Policy 2 of the adopted LPSP sets out the spatial strategy in Cornwall with Criteria 3b suggesting a key objective is generating and sustaining economic activity by:

“Providing homes and jobs in a proportional manner, where they can best sustain the role and function of local communities and that of their catchment;”

2.1.3 Criteria 3li suggests the role of Bodmin as a strategic employment location will be supported.

2.1.4 Policy 3 of the adopted LPSP includes a hierarchy which sets out how new development should be delivered up to 2030. This suggests the delivery of housing, community, cultural, leisure, retail, utility and employment provision in Bodmin will be managed through a Site Allocations DPD or Neighbourhood Plans and that development ‘at or well related to these towns’ will provide an appropriate level of affordable housing in accordance with the requirements of Policy 8.

The Draft SADPD

2.1.5 The SADPD includes a housing requirement in Bodmin of 3,100 dwellings in the plan period which is expressed as a ‘minimum’ and therefore reflects Policy 2a of the LPSP. Overall it is considered the draft SADPD generally accords with the targets set in the LPSP.

- 2.1.6 The strategy for Bodmin in the draft Site Allocations DPD suggests economic growth in Bodmin is a key priority and a number of large urban extensions are proposed to help achieve this. Whilst a significant amount of homes and jobs are proposed in Bodmin in the draft SADPD to deliver requirements in the LPSP it is important this is proportionate to the settlement to sustain the role and function of the local community in accordance with criterion 3b of Policy 2 of the LPSP. As set out in our Regulation 19 representations this can be achieved through the allocation of smaller sites on the edge of the town (in addition to the large urban extensions). Not only will this provide more certainty and flexibility in response to changing market demands, but smaller development sites are also attractive to a wider range of house builders (not just national companies) and will also inevitably be local. Therefore, the construction expenditure and jobs will contribute to the local economy and support the key priority of delivering economic growth in Bodmin.
- 2.1.7 Therefore, LVA consider smaller development sites should be allocated in addition to larger urban extensions in Bodmin for choice and flexibility, and to support balanced growth which will be important in achieving the objectives set in the adopted LPSP and ultimately will ensure sustainable development is achieved in accordance with Policy 1 of the LPSP.
- 2.1.8 In this regard, we made the case in our previous representations that a further policy should be added in the SADPD to reflect the allocation of Land southwest of Westheath Road. The site has potential to deliver around 45 dwellings as shown in the concept masterplan within the promotional document attached to our Regulation 19 representations.
- 2.1.9 We also made the point in our previous representations that the site could easily be included as part of the St Lawrence Urban Extension allocation (Policy Bd-UE3) which is located the other side of Westheath Avenue. Its inclusion would allow delivery of market and affordable housing in the short term and would not need to rely on the highway capacity improvements also proposed in the SADPD.
- 2.1.10 We note the response provided by the Council to representations submitted at the Regulation 19 stage in a number of documents including in relation to Bodmin, in a

document entitled 'Bodmin Reps Officer Comments'. In terms of our comment on promoting Land southwest of Westheath Road as an alternative site (Ref: 255) the Council have noted:

"It is not felt necessary to allocate the site to enable it to come forward, as the site represents an entirely appropriate proposition for 'rounding off', as it has development or road/rail infrastructure on all sides of the site.

The owners have previously promoted their land and it was deemed a potentially appropriate site for development, but not of a scale that required allocating in Bodmin; plus we had already identified sufficient land.

As a result, the landowners were previously advised that they progress the site through the Development Management process; which still remains the Council's position."

2.1.11 In addition the Council have recently published a document called 'Chief Planning Officer's Advice Note: Infill/Rounding off' (December 2017) which provides clarity on the 'rounding off' of settlements including in the main towns and guidance on when this could be acceptable.

2.1.12 As set out in our Position Statement in relation to Matter I, it is welcomed that the Council have identified Land southwest of Westheath Road as a potentially appropriate site for development which does not need to be allocated for development through the Site Allocations DPD. However, specific allocations provide certainty of delivery and any associated infrastructure requirements and we therefore still think that it is important for smaller sites to come forward through this process.

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

2.1.13 As set out in our Position Statement on Matter I, LVA welcome that the Council have updated their housing trajectories with a base year of March 2017 (within the Housing Monitoring Report webpage). This provides the most up to date position. It will be important that this is updated to include the monitoring period up to March 2018 once

this information is available. This will ensure the housing supply situation is up to date following adoption of the SADPD.

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?

2.1.14 As set out in our response to *question a* the strategy in Bodmin is generally consistent with the LPSP.

2.1.15 In our Regulation 19 representations we raised concern with the approach taken to the selection of sites for allocation in Bodmin with a strong emphasis on urban extensions on the edge of settlements with no smaller allocations identified in the draft SADPD, such as Land southwest of Westheath Road. The LPSP does not provide a steer on the size of allocations which should be proposed in the SADPD or neighbourhood plans but Policy 3 makes it clear that they should be consistent with the role and function of each settlement. It is noted in the '*Bodmin Town Framework Housing Assessment*' which is supporting evidence to the SADPD that to deliver the level of housing required in Bodmin, development on greenfield land on the edge of the town is necessary.

2.1.16 In our previous representations we considered the approach taken in the '*Bodmin Town Framework Housing Assessment*' which has resulted in the large urban extensions being allocated but raised concern as smaller allocations such as Land to the southwest of Westheath Road were too easily discounted from the process. The important contribution these sites can make to delivering housing in the short term has not been considered in the evidence which has resulted in the Council being heavily reliant on large urban extensions to deliver housing requirements in Bodmin. However, to achieve balanced growth it is important to include smaller sites as allocations as well which provide more certainty and flexibility, require less upfront infrastructure and tend to be readily available for development under single ownership.

2.1.17 As set out in our Regulation 19 representations LVA also questioned why the potential to combine the St Lawrence's Urban Extension (Cell 12) with land to the east of Westheath Avenue (part of Cell 11) has not been considered in the site assessment process used in the 'Bodmin Town Framework Housing Assessment'. This approach was used for a number of other cells during the process (parts of cell 7 and 8 were combined to ensure the best performing elements of each are retained), but not for the St Lawrence allocation and the LVA site. Both are independent of each other being located either side of Westheath Avenue but inclusion of the LVA site in the allocation would allow delivery of housing in the short term.

2.1.18 Some of the benefits of including the LVA site as part of the St Lawrence Urban Extension (Policy Bd-UE3) are as follows:

- Assist delivery of market and affordable housing in the short term;
- It will not need to rely on any highway capacity improvements proposed in the plan;
- It will assist delivery of the proposed cycle/walking network across Westheath Avenue;
- It would not compromise the delivery of the St Lawrence urban extension.

2.1.19 It should also be noted that the potential to combine these sites has previously been considered in the 'Bodmin Community Network Area Discussion Paper Preferred Approach consultation' (December 2011). In this consultation document the site was included as a potential site for residential development in both strategies proposed (northern and southern strategy as shown in figure 3 and 4). However, in a similar vein to the Urban Capacity Assessment the site was discounted from the urban extensions map (as shown on Figure 11 of this document) with no justification provided for its exclusion.

2.1.20 Based on the above LVA consider there is some merit in combining the Bd-UE3 allocation with 'Land southwest of Westheath Road'. However, as smaller sites such as this are not reliant on the larger allocations and not constrained by their delivery, separate allocations for smaller sites may be appropriate.

2.1.21 On this basis we do not consider the Plan is justified as it is not the most appropriate strategy when considered against reasonable alternatives or based on proportionate evidence.

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

2.1.22 As set out in our response to *question a* the level of housing proposed for Bodmin appears to reflect the requirements of the LPSP.

2.2 Issues relating to individual sites

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

2.2.1 As set out in our previous representations, LVA raise concern with the suitability of a number of the proposed allocations in Bodmin.

2.2.2 In terms of the Halgavor Urban Extension (Policy Bd-UE2) which is allocated for approximately 770 dwellings in the plan period, the Bodmin Town Framework (March 2017) states:

“the appropriateness of the site for development is dependant on resolving hydrological and transport issues. Firstly, the site would be expected to deliver an improved vehicular link across the railway line from Carminow Rd to Respyrn Rd and into the urban extension.”

2.2.3 Therefore, it appears there are a number of issues still to resolve for this allocation to be considered suitable and it is unclear whether any baseline assessments have taken place on this site.

2.2.4 In terms of the Callywith Urban Extension (Policy Bd-UE4) the site was ranked in the Urban Capacity Assessment as a cell with high landscape value which reflects the findings of the Sustainability Appraisal (SA). The SA suggested that the site is likely to significantly undermine the landscape objective to protect and enhance the quality of

the natural, historic and cultural landscape and seascape. It is important that further assessment is undertaken to assess the landscape sensitivity of the site and a lower density development is reflected in the wording of Policy Bd-UE4.

2.2.5 It is important that the urban extensions proposed as allocations are properly assessed in terms of their potentially significant impacts on air quality. In addition, LVA raise concerns regarding the allocation of sites located in areas at risk to flooding which should be discounted unless it can be demonstrated that there are no other reasonable options available.

2.2.6 Overall LVA do not consider the SADPD is justified as a number of sites proposed appear to be constrained which may impact on delivery. In comparison Land southwest of Westheath Road is a site which is suitable and deliverable. As set out in our Regulation 19 representations a number of technical assessments have been undertaken to support development proposals on this site which demonstrate the site has no unsurmountable constraints. Significantly the site does not fall within any special area designations, is located in Flood Zone I and has no landscape or heritage constraints.

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 reference to the five year housing land supply required by national policy?

2.2.7 As set out in our Regulation 19 representations LVA raise concerns with the delivery rates of a number of proposed allocations in Bodmin. The inclusion of further sites which can deliver housing in the short term as separate allocations (or in combination with the proposed urban extensions) would ensure the development requirements for towns are met and provide flexibility to the housing supply.

2.2.8 It is clear a number of allocations heavily rely on significant infrastructure being delivered to unlock development. This includes the various highway capacity improvements and sustainable transport measures identified in the Bodmin Town

Framework (March 2017) which are required to mitigate the highway impacts from the urban extensions. This is particularly the case for the Halgavor Urban Extension (Policy Bd-UE2) which is proposed as an allocation for approximately 770 dwellings in the plan period and will begin delivering 35 dwellings per annum in 2019/2020 (now delayed to 2021/2022). However, it is clear that there are still issues to resolve with this allocation as it is dependent on resolving hydrological and transport issues. The Bodmin Town Framework (March 2017) suggests that the upgrading of Callywith Road and Launceston Road is fundamental to the delivery of the site to provide the required capacity for the development to come forward.

- 2.2.9 In comparison smaller sites are not heavily reliant on the delivery of necessary infrastructure and can therefore deliver housing a lot quicker. This is particularly the case for Land southwest of Westheath Road which can be delivered without relying on the delivery of infrastructure required in Bodmin. Indeed, the site could easily be combined with the St Lawrence allocation which would allow the quick delivery of housing without having to rely on the delivery of necessary highway capacity improvements proposed in the SADPD.
- 2.2.10 On this basis it is essential that the Council allocates other smaller sites (or considers them as part of the urban extension allocations) to ensure that there are no delays in delivering the housing requirement in Bodmin. Therefore, LVA do not consider the SADPD is effective as it is not deliverable over the plan period, and on this basis the SADPD cannot be considered sound.

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

- 2.2.11 It will be important that any potential impacts on the natural qualities of Halgavor Moor are properly assessed in accordance with best practice.