



# **INSP.S4 Matter 9 Bodmin Spatial Strategy & Allocations**

Cornwall Council Position Statement

02 February 2018

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

Yes, the Allocations DPD was developed over a period of time, which both supported the production of the LPSP and the strategy for Bodmin, as well as the SADPD responding to the LPSP as it was being finalised. The following table highlights some key elements of the Bodmin CNA objectives set out in the Cornwall Local Plan Community Network Area sections, together with comments on how the SADPD strategy and policies compliment them.

<p><b>Objective 1 – Housing</b> Create a better balance between the amount of housing and jobs and enable the delivery of affordable housing</p>	<p>The SADPD identifies various housing and employment sites to achieve the LPSP targets. These housing sites will in turn support the delivery of affordable housing</p>
<p><b>Objective 2 – Travel</b> Address the traffic congestion that leads to the air quality issues in the town centre at Bodmin. Promote walking and cycling</p>	<p>The Transportation Strategy for Bodmin within the SADPD discusses the importance of addressing air quality issues (para 11.47), plus Table Bd3 sets out measures to deliver this ‘Church Square, Dennison Road and Turf Street (low speed environment)’ The strategy also discusses the importance of delivering sustainable transport measures, including walking and cycling</p>
<p><b>Objective 3 – Employment</b> Promote better quality jobs to create a more balanced economy.</p>	<p>The Economic Growth section for Bodmin in the SADPD discusses the aspiration to deliver high quality jobs; the SADPD also allocates three sites to provide new employment space (Bd-E1; part of Bd-UE4; and part of Bd-M1). Plus the SADPD safeguards four existing industrial estates, as being strategically important</p>
<p><b>Objective 4 – Services and Facilities</b> Expand Bodmin town centre to help to retain a greater level of comparison shopping trips. Maintain and enhance local shops, facilities and services with the aim of providing for local communities</p>	<p>The Retail Growth section of the SADPD for Bodmin discusses the importance of the town centre and the aspiration to enhance its offer. Although the SADPD does not allocate any new sites for retail, although it does highlight two town centre sites within the strategy text that are worthy of future consideration (paras 11.26 to 11.29)</p>
<p><b>Objective 5 – Environment</b> Ensure development is sensitive to the natural, built and historic environment of the area.</p>	<p>In selecting sites for development within the SADPD, consideration was given to their potential impact on natural and historic assets, which is reflected within the Bodmin Housing Evidence Base document and within the Sustainability Appraisal</p>

<p><b>Objective 6 – Infrastructure</b> Investigate the need for new road infrastructure to address congestion and air quality issues and to allow continued growth of Bodmin, support drainage infrastructure and promote ICT infrastructure</p>	<p>The Transportation Strategy for Bodmin within the SADPD discusses the importance of addressing air quality issues (para 11.47), as well as congestion related to growth. Table Bd3 sets out measures to deliver this and other highway improvements.</p>
<p><b>Objective 7 – Inequalities</b> Address deprivation in education, training, skills, and health as well as issues relating to disability.</p>	<p>The SADPD includes a section on delivering improved infrastructure for Bodmin, this includes improved education and healthcare facilities</p>

The Cornwall Local Plan Community Network Area section for Bodmin also discusses the importance of continuing *'to strengthen the employment role through development of new sites and the redevelopment of exiting employment sites'*. The SADPD identifies various sites to deliver new employment space, whilst also safeguarding four strategically important employment sites.

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

Yes. Updated information (as at 1/4/17) was provided and summarised within the response to the Inspectors' questions (INSP.S6) – set out in the Council response CC.S4 and detailed in CC.S4.4.

- 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?

Yes. The SADPD has identified an appropriate number of sites to deliver the LPSP commercial and housing targets; this is reflected within the trajectory set out in CC.S4.4.

The Bodmin Housing Evidence document (examination library ref. D7.1) indicates that an assessment was undertaken to understand the appropriate capacity to deliver growth within the existing urban area, before seeking to allocate greenfield sites on the edge of the town (which is in line with LPSP Policy 21). However, the assessment demonstrated that only approx. 1,295 dwellings (Table 3 of the Bodmin Housing Evidence document), i.e. only 40% of the LPSP housing target can be delivered within the existing urban area. As a result, it was necessary to allocate greenfield sites to ensure the housing target can be delivered within the Plan period. The Bodmin Housing Evidence document (D7.1), together with the Habitat Regulations Assessment (library ref. D2), SFRA (library ref. D4), etc, sets out the work the Council undertook to review the appropriateness of land on the edge of the settlement, which is summarised within the sustainability appraisal work.

The site allocations identified will enable the delivery of the remainder of the LPSP target (as set out in CC.S4.4).

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

### **Housing**

The summary of housing delivery, including the trajectory, is set out in response to the Council's response to the Inspectors questions - INSP.S6 (Council response – CC.S4.4). This shows that the estimated delivery rates for the larger sites, including the allocations Bd-UE2, Bd-UE3 and Bd-UE4, go beyond the Plan period. As a result, the sites identified are required to ensure the housing apportionment given to Bodmin in the LPSP document is achieved within the Plan period. It is recognised that the delivery rates for the urban extension sites are below the levels suggested within the methodology used by the Council in preparing its trajectory (i.e. larger sites were generally assumed to deliver 70 dwellings per year, but the Bodmin allocations are shown in the trajectory to only be delivering 35 dwellings per year. This prudent approach was taken to reflect the fact that the housing target for Bodmin represents a fairly significant increase from historic rates of delivery, as a result the Council did not want to overestimate delivery / market demand, therefore the 35 dwellings per year delivery rate was attributed to these larger urban extensions. However, these larger allocations have the ability to be delivering at a faster rate per annum, if it is demonstrated that the market demand exists.

### **Retail**

Table 2 of the LPSP document indicates that there is no quantitative requirement for Convenience floorspace within the Plan period, together with only a very minor requirement for Comparison floorspace at the very end of the Plan period. The Council made the decision not to allocate any sites for retail development within Bodmin because the capacity requirement identified is too far into the future to have any level of certainty that this requirement will still be in place by that time. This is because retail requirements are based upon complex calculations which are affected by many different factors, including: retail spending patterns, the economy, loss or gain of retail space within surrounding towns, etc. The Council also provided an update on permissions and completions since the preparation of the Cornwall Retail Study Update, which is set out in the Council's response to the inspectors questions INSP.S6 (Council response CC.S4.5). This shows that there has been a modest increase in retail permissions, beyond what was taken account of in the Cornwall Retail Study Update, which further reduces the need to allocate sites for retail uses.

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

The Bodmin Housing Evidence document (D7.1) sets out the assessments undertaken in the selection of sites for development; this was supplemented by various other assessments, such as the Habitat Regulations Assessment (D2), SFRA (D4), etc. These assessments considered all main planning and environmental constraints, in doing so enabling the Council to rule out land that would be inappropriate for development. These assessments were summarised within the sustainability appraisal work undertaken throughout the development of the SADPD and enabled the Council to conclude that on balance the allocations selected were appropriate for development.

The Air Quality Management Area for Bodmin covers the town centre and immediate area surrounding it. There are no allocations within the AQMA, but issues relating to air quality are recognised within the SADPD (paras 11.47 and 11.48) and various transport measures are set out within the strategy to help address wider impacts from development. Some of these measures have already been implemented (initial phase of works completed in 2017).

There is no built development proposed outside of a Flood Zone 1 area, as set out in the Strategic Flood Risk Assessment (D4); whilst site specific policies together with Policy 26 of the Cornwall LPSP document ensures that development will need to implement an appropriate SUDS scheme that will ensure no adverse effects downstream.

- 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?

The summary of housing delivery, including the trajectory, is set out in response to the Council's response to the Inspectors questions - INSP.S6 (Council response – CC.S4.4). This shows that taking a fairly conservative view on delivery (as set out in question d above), the housing apportionment for Bodmin can be achieved.

Completions and permissions (net) already account for 2,062 dwellings, which represents approximately two-thirds of the housing apportionment for the town.

The Council is aware that there is developer interest in Halgavor (Bd-UE2) from a national housebuilder, who is in the process of starting engagement activity with Cornwall Council and the Town Council on its masterplanning activity, with the intention of submitting an application by the end of 2018. Permission has also already been granted for the first 71 dwellings within the St Lawrences Urban Extension (Bd-UE3). Improvement of Callywith Gate junction has also been implemented by the Council which will support the delivery of the Callywith Urban Village (Bd-UE4) and Castle St (Bd-M1) allocations. Finally, proposals to take forward the Agri-food aspirations for the town are being progressed between Better Bodmin and Cornwall Council.

As well as Callywith Gate, transportation works to upgrade Church Sq / Dennison Rd and Turf St have already been implemented; as has improvements to Launceston Rd / Priory Rd roundabout. Plus some of the works to improve the towns walking and cycling network have also been implemented. The Council is also at an advanced stage in the development of its One Public Transport System for Cornwall, with the first phase of delivery currently being rolled out. Over £50m of funding has been secured so far which will include providing improved bus services for key transport corridors, including Bodmin, plus improvements to waiting facilities, RTPI, contactless payment, etc. Delivery of a half hourly train service will also be in place for all main stations throughout Cornwall in 2018, including Bodmin Parkway.

The Council is currently working with the NHS and the GP practices within the town to improve healthcare provision. The Council has also facilitated the increased capacity of St Petrocs School by 210 places. Plus the first phase of the post-16 college (referred to in SADPD para 11.39) has already been implemented.

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

The allocation is not covered by any nationally or internationally recognised environmental designations. Furthermore, the Habitat Regulations Assessment (D2) indicated for the site that *'As a result of the arable nature of the development site, along with the distance between the closest European site, and also intervening habitat comprising of existing urban development, it is considered unlikely that there will be fragmentation, degradation, or loss of supporting habitats. There will be no direct habitat loss'*.

The site is located on the immediate edge of the existing urban area; with existing built development (housing) on its north-western and eastern

edges; the site's northern boundary also abuts Bodmin College and the Dragon Leisure Centre, which provide active uses, in the form of sports facilities, in this location (plus the location of these facilities support's the site's sustainability). There are pockets of trees lining parts of the southern and northern edges of the site; whilst they are not protected, the vast majority can be retained as part of any scheme. With the exception of one field on the north edge of the site, there is no public access on any of the land within the allocation, which minimises its amenity value.

It is recognised that there are certain water features (e.g. springs) on part of the site; when reviewing the appropriateness of the site to be allocated, the Council's Hydrologist went out on site, and on inspection considered that the features would not preclude development of the site (Hydrologist's note can be seen in Appendix 8 of the Bodmin Housing Evidence document (D7.1)). However, to reflect the fact that there are various features that might need to be incorporated into the masterplanning of the site, when the Council calculated the number of dwellings that the site could provide, it dropped the net developable area from the standard 70% to 60%. This means it offers additional flexibility for the site to come forward whilst reflecting any on site features, as well as delivering an appropriate SUDS scheme for the site.