

Position Statement

- 1.01 Hallam Land Management controls land at Upper Chapel and which comprises:
- i. land subject to outline planning permission reference PA14/08184 with Reserved Matters submitted for approval (reference PA17/09517) pursuant to the outline permission; and
 - ii. adjacent land to the west with capacity for around 85 dwellings.
- 1.02 Representations have been submitted at the Preferred Options and Pre-submission stages of and both previous stages of the plan in relation to the adjacent land. This position statement should be read in conjunction with our representation reference 139b.
- a. Is the strategy for the town consistent with the LPSP?
- 1.03 No, the strategy is not consistent with the LPSP.
- 1.04 Although the strategy meets mid- and long-term policy objectives, it fails to meet short term objectives (even though they are identified in the CSADPD).
- 1.05 The role of Launceston is as a gateway to Cornwall, promoting itself as a strategic commercial centre. This element of the strategy is proposed to be addressed by an urban extension comprising new highway link serving strategic employment and housing allocations.
- 1.06 However, localised objectives are set out [**Document A.1, para 12.7**] which include enhancing the attractiveness of the town centre, taking advantage of the town's location, and delivering a range of housing stock responding to the communities need. These are immediate priorities to be capitalised upon, but will not, in our view, be served by development south of the A30 which will need time to establish itself and which the plan acknowledges [**Document A.1, para 12.34**] is disadvantaged by the A30 which separates it from the town centre. Sites south of the A30 are expressly identified by the Council as establishing the nucleus of a new community and in that regard [**Document A.1, para 12.10**], will only indirectly support Launceston town centre.
- 1.07 In our view, the strategic and local objectives in Launceston would be better served by a balance of sites which allows strategic sites to be delivered sequentially to early sites more closely related to the town centre. This does not mean delaying strategic sites, but it does mean identifying early-win sites which can meet immediate objectives.
- b. Is the existing housing land supply situation based on robust, up to date evidence?
- 1.08 We comment in relation to land at Upper Chapel, which is in the control of Hallam Land Management. Following the grant of outline planning permission (reference PA14/08184), reserved matters have been submitted for approval (reference

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PA17/09517). We believe that the trajectory set out by the Council for this site is achievable.

- c. Is the approach to the selection of sites for allocation consistent with the LPSP and appropriate?
- 1.09 No, the approach to the selection of site is not consistent with the LPSP, neither is it appropriate.
- 1.10 The LPSP (particularly the Inspector's consideration of the expression of housing figures as *minima* – see LPSP IR139) demonstrates that housing delivery targets must not be viewed as a ceiling. We are concerned at potential optimism in the assumed delivery rates of strategic sites to the south of the A30, and that without mitigation in the form of early-win sites, the selection of sites will fail to deliver the necessary minimum housing target for Launceston.
- 1.11 We also believe that the evidence used to identify preferred sites (and ultimately those now identified for allocation) is flawed.
- 1.12 In our view, the *Housing Evidence Report for Launceston [Evidence Base: D13.1]* and its predecessor reports fail to appropriately assess potential development sites due to:
- i. reliance on large 'cells' which fail to appreciate nuances in geography, topography and site conditions; and
 - ii. a failure to have regard to other evidence available to the Council, namely Inspector's Reports and their own planning decisions.
- 1.13 As a consequence, we believe that sites which may, in fact, be suitable for development, were eliminated from the assessment process without full and proper consideration. We believe that this is the case in relation to land controlled by Hallam Land Management to the west of the permitted development site at Upper Chapel.
- 1.14 Dealing with the reliance on 'cells', we note that the site was considered as a part of the 'Urban Extension Assessment' of the Housing Evidence report for Launceston under various references throughout the process (published in September 2016 and a key part of the evidence base for the Site Allocations Preferred Options, and now identified as **Document D.13.1**). In the latter stages of the assessment undertaken in 2011, the site was included in merged 'Cell A1/B1' which ran from the Upper Chapel area west to Trebursye.
- 1.15 This site was discounted at the Stakeholder Discussions Stage (step 10 of 13 in the process) with reasons given as being "*Highways constraints to support development of this scale. Excess capacity and more feasible options to the south of the town*" (table 6) and "*The concluding view was that neither Cells A1 nor B1 should be considered, at the current proposed scale, due to poor levels of access, reliance on motor vehicles and lack of connections to the town centre*" (Page 30). Therefore, this area did not proceed further through the assessment process.

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- 1.16 However, cells A1 and B1 clearly make up a significantly larger area than had been put forward for consideration by HLM in their submissions. It is evident that the potential scale of development which could be accommodated within cells was a consideration in the allocation of the sites, and the discounting of site A1 and B1 was undertaken on that basis. No consideration was given to sites which could be delivered on a smaller scale.
- 1.17 Table 1 of **Document D.13.1** provides a summary of the accessibility scoring of all assessed cells. Cell 1 scores favourably in comparison with other cells, being particularly well located with respect to primary schools and employment, and only scoring less well in relation to health facilities and supermarkets. This is despite the site being within 1km of Launceston Town Centre via a pedestrian route which does not involve crossing the A30. It is difficult to see how this cell should perform relatively worse than other sites located much further from the town centre, and where the A30 would act as a barrier to movement.
- 1.18 The assessment also fails to take into account other evidence available to the Council.
- 1.19 Prior to the grant of outline planning permission PA14/08184 on the land at Upper Chapel, a previous outline planning application (reference PA13/04056, for 130 dwellings) was refused by the Council but granted on appeal (reference APP/D0840/A/13/2209757).
- 1.20 As we set out in our Regulation 19 response, the Inspector presiding at appeal Inquiry considered at length the sustainability credentials of the site in paragraphs 38 to 47 of his Report.
- 1.21 At paragraph 46 the Inspector addresses other sites assessed by the Launceston Town Framework Plan, noting that:
- “It is not my remit in this appeal to prefer one site over another but, as discussed at the inquiry, the two TFP preferred sites (parts of Cells 13 and 14) although perhaps geographically closer to some facilities are not particularly well integrated into the present urban fabric in that the A30 dual carriageway and the straight and fast (60 mph speed limit) Link Road lie between the expansion areas and the town centre. Whilst there is a choice of routes for pedestrians and cyclists to cross the A30, I saw at my site visit that there are no easy crossing points over Link Road, at least at present. That is, it would appear to be necessary to accommodate compromises when identifying acceptable sites for future development around Launceston.”*
- 1.22 At paragraph 47, the Inspector considered the appeal site in greater detail, concluding that:
- “The appeal site does offer the opportunity for pedestrian and cycle access to the town centre without having to cross either the A30 or Link Road, albeit the 1km distance is slightly greater than the preferred 800m given in Manual for Streets. Neither*

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is the site without reasonable access to at least a local supermarket: there is a convenience shop at the petrol filling station on Western Road, opposite Carboth Lane. There is also an established bus route - which is proposed to be extended to run through the appeal site – which offers the opportunity for an alternative means of transport to the private car. I accept that the accessibility of the appeal site is less than optimal, but neither is it so poor that it has to be regarded as obviously unsustainable. That is, although the appeal site may not have been regarded as a preferred location during the evolution of the TFP, taking account of the guidance in NPPF, overall I consider that the proposed development north of Upper Chapel can be regarded as sustainable development.”

- 1.23 The Council themselves considered the sustainability of the site in determining planning application PA14/08184, the Officer's Report to Committee noting that:

“There are a number of benefits that the proposal would generate for local communities and the surrounding area. These include the opportunities for provision of affordable housing and open space within a sustainable location for housing development situated in close proximity to the town centre and range of local facilities.” (Para 129, Officer's report in relation to planning application PA14/08184, 15 January 2015).

- 1.24 As we note in our Regulation 19 response, planning obligations secured against permission PA14/08184 include:

- i. a £5,000 contribution to the implementation of a Travel Plan for St Catherine's Primary School;
- ii. a traffic management contribution of £30,000 towards local traffic management measures; and,
- iii. a contribution of £279,420 towards achieving the objectives of the Launceston Transport Strategy.

- 1.25 These obligations will address the impacts of the proposed development, but will also address the root cause of existing traffic concerns. Similar contributions could be made by other sites in this broad location and demonstrably provide appropriate reasons for the grant of planning permission. This would also be the case for other land in the vicinity of the permitted site.

- 1.26 Our conclusion is therefore that the approach to site selection it is not appropriate since it has discounted sites (such as the HLM extension land) which could make a meaningful contribution to meeting housing need in accordance with the local objectives set out in the plan.

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d. Is the level of housing and commercial development proposed for Launceston, justified with regard to the targets in the LPSP? With particular regard to allocation LAU-H2 as a future direction of growth and to local market conditions.

- 1.27 The level of housing is not justified in relation to the targets in the LPSP since short-term ambitions are not met – that can only be done in relation to early-win sites capable of rapid implementation.
- 1.28 We do not dispute the role of strategic development to the south providing long term housing capacity in Launceston. However, we do not believe that the answer is to bring forward those sites, since they rely upon the delivery of the same strategic infrastructure as other allocated sites. The answer is to secure early-win sites such as a second phase of development at Upper Chapel.

e. Is the existing housing land supply situation in Launceston based on robust evidence?

- 1.29 Land at Upper Chapel, which is in the control of Hallam Land Management is capable of being delivered in accordance with the Council's trajectory. Following the grant of outline planning permission, reserved matters have been submitted for approval. We believe that subject to timely approval of those reserved matters, development could commence later in this calendar year.
- 1.30 We are concerned at the potential for optimism in relation to strategic land south of the A30 which is allocated as LAU-H1 and LAU-H2.
- 1.31 We note that a smaller parcel forming part of site LAU-H1 (providing capacity of 80 to 90 dwellings, rather than the 300 of the overall LAU-H1 site was subject to EIA Screening in July 2017 (reference PA17/06271). No reference was made to the inclusion of a strategic highway link within documentation, but in any event, the potential development was identified as EIA Development due to the potential for significant environmental impacts to arise on a cumulative basis. Applications for EIA development will take longer to prepare and longer to determine than those without. It is reasonable to assume that subsequent applications within LAU-H1 and LAU-H2 will also be consistently viewed by the Council as EIA development meaning an extended planning process in each case.
- 1.32 We are not aware of the progress made in securing delivery of the southern loop road. However, the Council's own evidence demonstrates slippage in the timetable for its delivery. Evidence base supporting the LPSP (Reference **J.7.12** of that evidence base) indicates delivery of the southern loop road in the 2016/20 period. The CSADPD evidence base (**CC.S3.1**, Appendix 1) indicates a delivery programme with on-site delivery starting in 2023.
- 1.33 It is also unclear as to what the cost of the infrastructure will be. Costs ranging between £5m and £36m are cited in various documents (see for example £20m in **CC.S3.1**, £30.6m in **D13.4.5** and £5m in **J.7.12**) and there must therefore be some doubt as to the extent to which the proposal has been fully planned and costed. Representations submitted by Bovis Homes [64b] indicate that routing remains a matter of discussion.

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- 1.34 For these reasons, we consider the potential for the housing delivery rates to be optimistic.
- 1.35 We respectfully recommend that modifications must be made to the plan to address this optimism, and to provide a contingency housing land supply through the allocation of additional suitable sites.
- f. Are the individual allocations and proposed land uses suitable, having regard to planning and environmental constraints?
- 1.36 We do not object in principle to the identified allocated sites. As expressed in response to the other issues in this Matter, our concern relates to the certainty of timing of their delivery. We note, however, the EIA Screening Opinion issued with respect to the eastern parcel within LAU-H1 anticipates the potential for significant cumulative impacts.
- g. Is there robust evidence to demonstrate that allocations and infrastructure, particularly education infrastructure and transport infrastructure related to LAU-H3 and LAU-H1, 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?
- 1.37 There is conflicting evidence in respect of the timing of delivery of infrastructure to support LAU-H1. There also appears to be an absence of progress in relation to necessary planning approvals. In the absence of clear and consistent evidence, we conclude that there cannot be certainty that the anticipated housing delivery will be achieved.
- 1.38 For that reason, we conclude that early-win sites, capable of early delivery and contributing to the five-year housing land supply, are necessary to ensure that the minimum housing requirements of the LPSP are met. We recommend that modifications are made to the plan to allow a contingency to be identified in the form of an additional allocation of land.