



INSP.S4 Matter 10 Launceston Spatial Strategy & Allocations

Cornwall Council Position Statement

02 February 2018

General Issues**a. Is the strategy for the town consistent with the LPSP?**

The Council considers the strategy for Launceston to be consistent with the LPSP, due to the reasons set out below.

Launceston sits within Launceston Community Network Area (CNA). The LPSP (Community Network Area Sections) sets out that Launceston is the main settlement in the CNA and will be the focus for the majority of the CNA's growth. The CSADPD reflects this strategy.

Eight Strategic Objectives for the wider Launceston CNA are presented. These are included below with a comment setting out how the proposals in the Allocations DPD align with these.

Strategic Objective for Launceston CNA	Consistency in the CSADPD?
<p>Objective 1 – Affordable Housing Enable the provision of affordable housing.</p>	<p>The CSADPD allocates sites for housing in Launceston which meet the housing targets set out by the LPSP and which will be subject to Policy 8 (Affordable Housing) of the LPSP.</p>
<p>Objective 2 – Employment in Launceston Sustain and enhance Launceston town's employment role, through the provision of employment sites and necessary infrastructure.</p>	<p>The CSADPD allocates land for employment at Launceston to meet the target set out by the LPSP.</p> <p>It also safeguards employment land at existing employment sites under policies LAU-E3, LAU-E4 and LAU-E5.</p> <p>Launceston is a town that has limited flat land and Policy LAU-E1 has been identified as a future direction of growth (i.e. beyond the Local Plan targets) partly due to the importance of protecting this area of flatter land for employment in the longer term.</p> <p>The Infrastructure Strategy of the Launceston section sets out the strategies for education, healthcare, utilities (water/drainage and electricity), transportation, green infrastructure (biodiversity, public open space, green links and flood attenuation) for the town.</p>
<p>Objective 3 – Employment Opportunities Raise the quality and quantity of employment opportunities, including prioritising the use of brownfield sites</p>	<p>The CSADPD works to meet this objective by identifying land for future employment growth.</p> <p>The Launceston CNA Employment</p>

<p>for employment.</p>	<p>Evidence Report sets out how the employment sites at Launceston have been arrived at and includes a consideration of brownfield sites. There were no appropriate brownfield sites for employment allocations in Launceston.</p> <p>Policies LAU-E3, LAU-E4 and LAU-E5 safeguard land for employment uses at existing brownfield employment sites.</p>
<p>Objective 4 – Community Services Improve the provision of and access to community services and facilities, especially sustainable transport, health services, further and higher education and training opportunities and public open space.</p>	<p>The policies set out for Launceston within the CSADPD include a requirement for contributions to the Launceston Transport Strategy and requirements for some other facilities such as open space and education as appropriate.</p> <p>In addition to this the Infrastructure Strategy presents strategies for education, healthcare, utilities (water/drainage and electricity), transportation, green infrastructure (biodiversity, public open space, green links and flood attenuation) for the town through the plan period.</p>
<p>Objective 5 – Infrastructure To deliver the highway and sustainable transport infrastructure needed to support the delivery of future housing and economic growth and to deliver other infrastructure required for the growth of the area.</p>	<p>The policies set out for Launceston within the CSADPD include a requirement for contributions to the Launceston Transport Strategy.</p> <p>The Launceston section of the CSADPD also includes Infrastructure Strategy section, as referred to above.</p>
<p>Objective 6 – Congestion Tackle congestion in Launceston.</p>	<p>The Transport Strategy for Launceston sets out to maximise the highway capacity and improve provision to support more sustainable movement (i.e. journeys by foot, bike and public transport). This strategy will work to help tackle congestion in the town.</p> <p>Furthermore, the selection of sites has focused growth to the south of the A30, in part, to minimise the potential of adding further congestion onto the town centre.</p>
<p>Objective 7 – Drainage Improve surface water drainage in</p>	<p>Strategic Flood Risk Assessment has informed the development of policies in</p>

Launceston.	the CSADPD.
Objective 8 – Heritage Assets Maintain and enhance the area’s heritage assets for the community’s benefit and to enhance the area’s tourism offer.	Heritage Impact Assessment has informed the development of policies in the CSADPD.

Delivery Targets

The Launceston section of the CSADPD presents a strategy to ensure that the housing and employment targets for the town, set out within the LPSP to 2030, are met through the allocation of appropriate sites (LAU-H1, LAU-H3 and LAU-E2). These sites have been arrived at following a consideration of existing urban capacity, including extant planning permissions and potential windfall development. As a result, the combination of sources of delivery will enable the targets to be met.

The approach also identifies two ‘Future Directions of Growth’; one for employment and one housing. These sites, which provide for growth in excess of the targets in the LPSP, are not required in order to meet the LPSP targets. They are justified in order to more effectively plan for the longer term growth of Launceston i.e., substantial planning and investment will be required to deliver a new highway through the sites and by identifying these now this provides certainty over the direction the town plans to grow in the longer term. LAU-E1 and LAU-H2 are only planned to come forward either beyond 2030 or if the need is required ahead of this.

The LPSP includes a requirement for retail provision at Launceston. Updated information was provided within the response to the Inspectors’ questions - INSP.S6 (Council response CC.S4.5); where this sets out that the balance of commitments for Launceston shows a net increase in convenience commitments and a net loss in comparison commitments over the quantum’s previously highlighted by GVA in the Cornwall retail update, 2015. The additional convenience commitments will result in only a relatively minor requirement at 2024/2030; whilst the reduction in comparison commitments is still likely to only result in minor requirements between 2024/2030. The Council does not consider that these relatively small requirements would warrant allocating an out-of-town location(s), as there are no appropriate town centre sites available.

Furthermore, GVA Retail study also advocates such an approach for towns with relatively small requirements and no appropriate town centre locations. This in part is as a result of the complexities and sensitivities of calculating retail capacity; with capacity figures being affected by many different factors, including: retail spending patterns, the state of the general economy, permissions granted in surrounding towns etc.

Consequently, the CSADPD does not allocate any additional retail sites at Launceston, however the Council will monitor and review this position throughout the plan period, and react accordingly to any change in this position, with the ability for the Future Direction of Growth being able to accommodate

any requirements, if assessments in future reviews of the SADPD suggests it is necessary.

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 CC.S4.4.

c. Is the approach to the selection of sites for allocation consistent with the LPSP and appropriate?

Yes. As set out in the Launceston Housing Evidence Base Report (Document ref. D13.1) and the Launceston Employment Evidence Base Report (Document ref. D13.2), the Council first sought to identify appropriate sites within the existing urban area to help meet the growth targets set by the LPSP (this approach being in line with Policy 21 of the LPSP, which seeks to ensure the best use of land).

Accordingly, for housing, the CSADPD includes site allocation Policy LAU-H3 for residential development at Kensey Valley, which lies within the existing urban area of the town. For employment, although it was not possible to identify any new and suitable strategic employment sites within the existing urban area, this approach did identify capacity for approximately 4,120sqm of employment space on existing employment sites at Pennygillam and Newport Industrial Estates; with this amount of land being taken into account when calculating how much greenfield land is required to meet the remaining employment targets.

Only when this urban capacity search was exhausted did the Council seek to allocate greenfield sites on the edge of the settlement. The Launceston Housing Evidence Base Report and the Launceston Employment Evidence Base Report continue to set out the detailed assessment process that took place in considering greenfield options of land directly adjoining the existing built settlement. This included mapping of environmental designations; landscape character assessment, and accessibility mapping. Specialised assessments (such as Heritage Impact and Flood Risk Assessments) also informed the process, together with an overarching Sustainability Appraisal. This thorough assessment process ensured that the most sustainable greenfield options were identified; with this being a preferred direction of growth to the south of the town and the A30. The identification of sites to the south of the town will link up with existing development and permissions; the allocations and future directions of growth will help to create a sustainable neighbourhood to the south of the A30; with the allocations providing new services and facilities for new and existing residents, as well as providing a more holistic network of pedestrian/cycle and highway routes, which will join up permitted and completed developments.

Finally, the sites safeguarded as strategically important employment (LAU-E3, LAU-E4 and LAU-E5) are in line with Policy 5 of the LPSP document.

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.

Housing

The summary of housing delivery, including the trajectory, is set out in the Council's response to the Inspectors questions - INSP.S6 (Council response – CC.S4.4). This shows that delivery of housing at Launceston, on allocations LAU-H1 and LAU-H3, is forecast to be complete within the plan period. This forecast together with completions to date, extant planning permissions and an allowance for windfall, demonstrates that the level of housing proposed at Launceston through allocation LAU-H1 and LAU-H3 is justified with regards to the targets of the LPSP.

Delivery of housing on allocation LAU-H2 is not forecast to be completed within the plan period as allocation LAU-H2 is identified as a 'Future Direction of Growth' (see the Council's response to the Inspectors questions - INSP.S6 (Council response – CC.S4.4), for more details regarding the definition of Future Directions of Growth). Consequently, as allocation LAU-H2 is not forecast to contribute to housing delivery within the plan period, this allocation is unlikely to undermine market conditions or contribute to an oversupply of houses above the target of the LPSP.

Employment

Table 10 of the Launceston Employment Evidence Base Report (Document ref. D13.2) sets out that, together with completions to date, extant planning permissions and existing capacity within Newport and Pennygillam Industrial Estates, the allocation LAU-E2 satisfies the target of the employment target of the LPSP and therefore is justified.

Similar to allocation LAU-H2, allocation LAU-E1 is also identified as a 'Future Direction of Growth' and, consequently, is not forecast to contribute to employment delivery within the plan period.

Retail

The LPSP includes a requirement for retail provision at Launceston. Updated information was provided within the response to the Inspectors' questions - INSP.S6 (Council response CC.S4.5); where this sets out that the balance of commitments for Launceston shows a net increase in convenience commitments and a net loss in comparison commitments over the quantum's previously highlighted by GVA in the Cornwall retail update 2015. The additional convenience commitments will result in only a relatively minor requirement at 2024 / 2030; whilst the reduction in comparison commitments is still likely to only result in minor requirement between 2024 / 2030. The Council does not consider that these relatively small

requirements would warrant allocating an out-of-town location(s), as there are no appropriate town centre sites available.

Furthermore, GVA Retail study also advocates such an approach for towns with relatively small requirements and no appropriate town centre locations. This in part is as a result of the complexities and sensitivities of calculating retail capacity; with capacity figures being affected by many different factors, including: retail spending patterns, the state of the general economy, permissions granted in surrounding towns etc.

Consequently, the CSADPD does not allocate any additional retail sites at Launceston, however the Council will monitor and review this position throughout the plan period, and react accordingly to any change in this position, with the ability for the Future Direction of Growth being able to accommodate any requirements, if assessments in future reviews of the SADPD suggests it is necessary.

e. Is the existing housing land supply situation in Launceston based on robust 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 CC.S4.4.

Issues relating to individual sites

f. Are the individual allocations and proposed land uses suitable, having regard to planning and environmental constraints?

Yes, the allocations have been subject to a variety of assessments (including a Sustainability Appraisal, Landscape Assessments, Heritage Impact Assessments and Flood Risk Assessments) and the outcomes of these have informed the policies.

The assessments demonstrate that residential development is appropriate at LAU-H1 and LAU-H3 having regard to planning and environmental constraints and these site areas have been influenced by aspects such as topography and biodiversity.

Similarly, the identification of land at LAU-E2 for employment development is considered appropriate and the policy contains mitigation to reduce negative impacts on the listed buildings at Badash Farm.

A variety of issues, but primarily accessibility constraints prohibit larger scale residential allocations in other areas to the north, west and east of the town. To the west of the proposed allocations there is an extant permission for a mixed use scheme, including 275 dwellings and a supermarket. The CSADPD does not

make allocations where permissions are in place, as the principle for development at this location is established.

Policies LAU-H1 and LAU-H3 include a requirement 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', the reason for this is to avoid development coming through in a piecemeal fashion and therefore presenting a risk to infrastructure delivery, which is key to the success of schemes in both of these locations, and where these sites are controlled by more than one landowner.

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?

Yes there is robust evidence to demonstrate that allocations and infrastructure, particularly transport and education, will be delivered at a sufficient rate and suitable timescale:

Transport Infrastructure –

LAU-H1 – Developers are actively engaged in pre-application discussions associated with PA16/07246 and PA17/02059/PREAPP and are working with officers in order to arrive at a viable position for delivery of the first segment of the Southern Loop Road (SLR), through the site (NB. delivery of the *full* SLR is not required in order to support growth planned at LAU-H1).

CC recognises the need for public sector intervention both financially and in terms of design on the delivery of the wider SLR project and, to this end, have preliminary design work completed, with further work ongoing, and are currently undertaking a Development Brief which sets out the parameters and expectations to support developers future masterplans.

LAU-H3 – It should be noted that an error has been noticed in Policy LAU-H3 (criteria d). Policy LAU-H3 (criteria d) should be worded to reflect that delivery of the housing should not prohibit the delivery of the Kensey Valley Estate Road (KVER), but the delivery of a continuous route from Newport Industrial Estate to Kensey Valley Meadow does not need to be in place before the housing can come forward. As a result, the landowners/developers on either side of Ridggrove Hill can deliver their elements of the road, providing a design and alignment that would enable the road to be connected sometime in the future.

The is because Cornwall Council recognises that there may be need for a public sector financial intervention in make the link between the two halves of the site. The road has been a long term aspiration within parts of the community, which

could support wider proposals to reduce traffic within the town centre, so the Council wants to ensure development of LAU-H3 does not prevent the ability to create the link in the future. Moreover the development can play a positive contribution in providing elements of the road through the delivery of the scheme. The nature of the KVER is that the road should not be designed to such a standard that would encourage speeding or high volume traffic; it is not intended to act as a 'link road' or an alternative route for HGVs and as such the costs of delivery of the KVER should not be unduly inflated compared to a normal estate road.

Proposed revised wording is as follows:

d) Development of this site must contribute to the delivery of the Launceston Transport Strategy; specifically the development of the site must **future proof the ability to deliver the Kensey Valley Estate Road. The development should provide elements of the road on either side of Ridgegrove Hill, to a design and alignment that would enable their connection in the future (connection of the two elements of the road, either side of Ridgegrove Hill, are not required as a result of the development).** ~~an additional road access for residents, connecting Kensey Valley Meadow to Newport Industrial Estate.~~

Education Infrastructure - The construction of a new 420 place primary school at Hay Common is planned with completion anticipated by September 2019. Cornwall Council is working with the Department for Education and the Education and Skills Funding Agency in order to ensure delivery through the Free Schools Programme.