

PS.216a.11

Cornwall Site Allocations Development Plan Document

Matter Eleven – Saltash Spatial Strategy and Allocations

Participant Statement by Persimmon Homes ID Ref No 216a

**Persimmon Homes
Tamar Business Park
Pennygillam Trading Estate
Launceston
Cornwall
PL15 7ED**



1. General issues

a) Is the Strategy for Saltash consistent with the LPSP?

2. The Strategy of the Plan for Saltash requires modification to be consistent with the LPSP, particularly in respect of the need to be positively prepared with its links to Plymouth City.
3. In this context, it is noted that Plymouth City Council made representation to the Cornwall Site Allocations DPD at Regulation 19 stage of the plan in respect of the strategy section for Saltash. In doing so it stated that the Plan is unsound and has proposed that the strategy section with Plymouth should be more positively prepared, particularly to ensure that infrastructure, housing and employment provided in Saltash is provided for in a manner that is consistent with the plans of Plymouth.
4. Therefore while the plan is required to be consistent with that of the Cornwall Local Plan, which will have considered the high level strategic duty to cooperate links with Plymouth, it must also establish a lower level strategy and planning framework that is consistent with that of neighbouring authority Plymouth. This is particularly pertinent in respect housing, employment and infrastructure.
5. Cornwall Council has responded its Consultation Comments Received document that it could make a number of modifications to the text in the strategy and other parts of the Saltash section of the Plan to be more positively prepared and reflect the representations from Plymouth Council.
6. Having reviewed the comments made by Plymouth City Council and the responses made by Cornwall, Persimmon Homes is of the same opinion that closer links with Plymouth in respect of the shared functional relation should be more positively expressed throughout the Saltash section is welcomed to make the plan sound.
7. Appendix A of this statement contains the summary responses from Plymouth City Council and Cornwall Council's response to them that are supported by Persimmon Homes in order to make the plan positively prepared and sound.
8. As a further point, we would suggest that paragraph 13.21 is amended in order to ensure that it properly reflects the wording of Policy 2a of the Cornwall Local Plan. It is submitted that the following wording could provide the necessary clarity, amendments are shown in bold;
 - a. "13.21 The LP:SP has targeted the delivery of **a minimum of** 1200 dwellings at Saltash. Table Sit2 sets out delivery against this target, which shows there is a

need for land to be allocated to accommodate at least 851 dwellings.

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

9. No, the evidence to support the delivery of housing is not robust and Persimmon Homes remains of the opinion as originally submitted in our representations that there will be a significant deficiency in housing supply in the town without any flexibility built into the Plan.
10. The Plan needs to be more positively worded to encourage additional development that is consistent with the Plan and make an additional allowance of at least 20-30% additional housing above the requirement figure to ensure delivery.

c. Does the Plan make adequate provision for retail development in Saltash, having regard to the lapse of prior planning permission?

11. No comment

d. Does the Plan make adequate provision for the prior delivery of sewage treatment capacity to serve development proposed within the Plan period?

12. No Comment

Issues relating to individual sites

e. Is there robust evidence that the housing supply trajectory for Saltash is realistic and deliverable, having regard to its high dependence on strategic allocation SSLT-UE1 at Broadmoor?

13. The trajectory for Saltash is not realistic or deliverable with its high dependence on SSLT-UE1 (Broadmoor). The outcome of this is that the plan is ineffective and as such, unsound.
14. There are two aspects to this issue, and both are considered in turn below.
15. Expected delivery, timing and rates
16. The expectation that Broadmoor will deliver 100 units in 2020/21 is unrealistic and no evidence has been provided to demonstrate that this is achievable. No evidence has been provided to the examination by the authority to demonstrate that houses will be completed in the context of the infrastructure necessary or a timetable to provide confidence that 100 units will be provided in its first year of delivery.

17. This rate of growth is considered to be highly optimistic given that there is no evidence which has been put forward which suggests that the development of Broadmoor Farm will come forward as projected.
18. It is therefore submitted that the evidence of delivery of the housing trajectory is not sufficiently robust or justifiable.
19. Flexibility
20. The key element of the plans unsoundness, however, stems from the inflexibility of the housing trajectory and its inability to respond rapidly to changing circumstances (paragraph 14 of NPPF refers). This is significant in the context of the Cornwall Local Plan and its policy framework for establishing five year supplies that are non-transferable between Community Network Areas (CNA). On this basis, if the housing delivery should stall, or not establish itself as intended here, as we expect it will not, there is no contingency allowance to enable housing delivery to be maintained within this CAN, as is the intention of the Local Plan framework. On this basis, the inflexibility renders the plan ineffective.
21. To be sound, the plan requires a range of sites to delivery surety in the housing supply as is observed in other CNAs within the proposals.
22. For example, Spatial Strategy Policy 2) states in support of the objective to sustain and generate economic activity that specifically for Launceston and Saltash they are highlighted as Gateways to Cornwall. The spatial strategy for Launceston provides a range of measures at para 12.14 and Figure LAU1 identifies future directions of growth over and above that required for the Local Plan period to give confidence in the investment strategy. Mixes of Strategic policies are included to achieve this.
23. In contrast, for Saltash one location is identified for growth. This is inconsistent with the approach taken elsewhere in the plan where flexibility can be observed.
24. This deficiency in the plan is observed by the Saltash Neighbourhood Plan steering group that has identified this issue as part of their current draft planning policies. It has included wording within Policy H1 which would allow flexibility in order to ensure delivery without the need for extensive further consultation and drafting of revised Development Plan Documents.
25. The draft wording is as follows;

"POLICY H1 - ENSURING HOUSING APPORTIONMENT TARGET UP TO 2030 IS ACHIEVED

If the required housing trajectory required to reach the Cornwall Local Plan Housing apportionment target of 1200 by 2030 is demonstrated to be falling short in the annual CC assessment, then additional urban extension housing will be allowed in accordance Saltash Housing Evidence ranking assessment that has been carried out as part of preparation of the Cornwall Allocations Development Plan Document.

Such extensions beyond the development boundary set in Policy DP1 may be permitted if they are:

- i. of appropriate scale to the area,
- ii. are in accord with the DPD's assessment ranking in terms of sustainability and suitability (based on criteria of location, access, impact and developability).
- iii. comprise a mix of uses including employment land, live/work units, completed workshops to be delivered in-phase with the housing element
- iv. Include provision for enhanced or additional community space and facilities
- v. Include measures to ensure that the development integrates as a new neighbourhood of Saltash and relates well with adjoining neighbourhoods, in accordance with Policy SN3
- vi. On sites of more than 50 dwellings the opportunity to provide some affordable housing in the form of serviced plots available for self-build and self-completion developments"

26. Although the main housing need is to be met by the Broadmoor Farm Strategic Site other sites may be used if their housing delivery meets requirements not met by Broadmoor Farm"
27. This appears to be an entirely sensible approach and is welcomed and it is submitted that Cornwall should adopted a similar approach in the Site Allocations DPD as an overall approach in towns where allocations rely on one single site for delivery.
28. The soundness of the plan is dependant on the robustness of the allocations contained within it and its ability to deliver the minimum levels of housing required by the Cornwall Local Plan. The Council has acknowledged within its recently released Chief Planning Officer's Note that the lack of allocation of a site should not be an absolute barrier to the delivery of alternative sites however they have not acknowledged this is the DPD which would appear to be a sensible place for such an acknowledgement given the lack of weight which can be applied to a Chief Planning Officers Note.
29. It is therefore submitted that it would be entirely reasonable to add an additional paragraph to the Saltash section of the Development Plan Document after paragraph 13.24. It is proposed the following wording is used;

30. Para 13.25: Whilst the Council has allocated Broadmoor Farm for growth at Saltash, the Council will positively encourage and support additional sites coming forward in accordance with the development strategy for the area in order to support the delivery of the housing requirements for the area.

PS.216a.11

Respondent	Section	Comment	Officer Comment [Cornwall Council]
316 Plymouth City Council	Economic Growth	Para 3.13, Plymouth is described as having a "heavy influence" on Saltash. This still seems to be a fairly negative way to describe the close relationship and still implies that there is a problem to be fixed. Why not use this introductory paragraph to really spell out the links in terms of jobs, facilities, schools etc. and the way that people from Saltash and Plymouth use those facilities wherever they may be to their benefit? For example we know that residents of Plymouth work in Saltash, use the Waitrose supermarket, go to school and use leisure facilities in Saltash, and vice versa. These relationships benefit residents and businesses in both settlements and should form the basis of the key policies for Saltash.	The Council could amend para 3.13 to more positively reflect the links between Plymouth and Saltash as follows: "13.1 Saltash is situated on the eastern edge of Cornwall at the lowest bridging point on the Tamar River. The town acts as a gateway to Cornwall and as the main local service centre for many of the smaller settlements surrounding it. <u>Saltash lies across the river from Plymouth and the town has a close relationship with the city. Saltash residents use the higher order facilities found in Plymouth, such as the availability or a range of employment opportunities, the schools, colleges and universities and the shops, the regional hospital at Derriford and cultural attractions in the City Centre. Plymouth residents also access Saltash for employment and facilities such as the Waitrose supermarket.</u> A key characteristic of the town's population is the greater numbers of families with parents of a working age than retired people. Younger people tend to leave the area to seek training and employment."
316 Plymouth City Council	The Strategy	Para 13.7, whilst recognising that "the proximity of Plymouth" offers opportunities, goes on to say that "it also acts as a potential constraint to the town's	The Council could amend para 13.7 to more positively reflect the links between Plymouth and Saltash by amending the last sentence

		<p>economic potential". This seems far too negative and again suggests a problem to be fixed - Saltash can benefit by being presented as a potential location for investors looking for premises in Plymouth, becoming part of the city's economic offer? Saltash is walking distance from the second largest city in the SW England does not need to be a constraint; it's a huge opportunity shaping the way the town functions.</p>	<p>from:</p> <p>"Furthermore, whilst Saltash's proximity to Plymouth offers significant economic opportunities, it also acts as a potential constraint to the town's own economic potential." to,</p> <p><u>"The proximity of Saltash to Plymouth offers significant economic opportunities, for example in providing access for residents to a range of high quality jobs in locations which can be reached by public transport or other sustainable modes of travel. In addition, Saltash can also be positioned as a location for businesses which are engaging in the wider Plymouth economic growth agenda."</u></p>
<p>316 Plymouth City Council</p>	<p>Economic Growth</p>	<p>Para 13.11. The 'heavy influence' of Plymouth seems to be the guiding principle of this paragraph. Why not celebrate the relationships between Plymouth and Saltash and recognise that Saltash with Plymouth forms a sustainable location that is attractive to investors</p>	<p>The Council could amend para 13.11 to more positively reflect the relationship between Plymouth and Saltash by amending the paragraph to read:</p> <p><u>"13.11 Saltash has a close and positive relationship with the city of Plymouth, immediately to the east of the town. This relationship presents significant opportunities and benefits to the community of Saltash (for example shopping, leisure and health facilities, high value employment opportunities, further and higher level</u></p>

PS.216a.11

			<p>education). <u>Nonetheless, Saltash still strives to provide additional employment opportunities within the town, to increase the opportunity for residents to both live and work within the town, in order to create a sustainable local community.</u>"</p>
316 Plymouth City Council	The Strategy	Para 13.10 is welcomed. But it would be useful to expand this to set out some of the ways in which these cross boundary impacts will be recognised, reflected in policy and used to the benefit of Saltash and South East Cornwall.	<p>The Council could enhance para 13.10 as follows:</p> <p>"13.10 Although Saltash lies within the administrative boundary of Cornwall, it is important that the cross border impacts of growth and the functional relationship with the neighbouring city of Plymouth <u>are recognised. For example, the town's major growth area will attract people working in Plymouth and residents of the city may also work in businesses locating in the new employment areas. It will therefore also be necessary to consider improvements to transport links to/from Plymouth including a range of measures that encourage the use of all modes of sustainable transport crossing the Tamar Bridge. Such projects will contribute to strengthening the existing links with the city.</u>"</p>

<p>316 Plymouth City Council</p>	<p>Retail Growth</p>	<p>Retail section. The reference to Plymouth is welcomed, but again seems de minimis. Saltash in many ways functions as part of the Plymouth retail hierarchy. For residents of Saltash, Plymouth City Centre is their main destination for comparison shopping trips, and they will also travel to Plymouth to access supermarkets in the city and retail outlets at Marsh Mills. This is demonstrated by the City's Retail Study 2017.</p>	<p>The Council could enhance para 13.16 as follows:</p> <p>"13.16 Saltash's retail offer is naturally influenced by the wide selection of retail provision offered by Plymouth. <u>Residents of Saltash are able to easily access Plymouth City Centre, which has a wide and comprehensive range of retailers, as well as other retail outlets at locations such as Marsh Mills and the large supermarkets present within the city.</u> Provision locally within Saltash <u>complements the retail offer in Plymouth, and</u> is split between the town centre, which sits on the east of the town, and the out of town convenience offer, which is located near to Carkeel; at Carkeel, land immediately the north-east and south-east of Carkeel Roundabout and outside of the safeguarded employment areas SLT-E4 and SLT-E5, is either already occupied by large national retailers or is planned to be. Because these are prime economic sites it is important to the town that retail/employment uses are maintained in these locations."</p>
--	--------------------------	--	---

<p>316 Plymouth City Council</p>	<p>Transport Strategy</p>	<p>Para 13.36 The references to public transport links to Plymouth are welcomed, but why does this narrative not lead to a conclusion that it would be best to work with the City Council to improve public transport and other alternative travel modes between Saltash and Plymouth, including the beneficial impact to both the Plymouth and Cornwall transport networks of a western park and ride in Saltash? This paragraph seems to seriously downplay the cross boundary transport issues that exist, and also seems to ignore the good joint work on evidence which is ongoing between the two authorities. The strategic role of the A38 and the Tamar Bridge is part of the work programme of the Transport Strategy Working Group (TSWG) which was established from Feb 2016 to facilitate joint working of the Highway Authorities covering the Plymouth TTWA: PCC, CC and Highways England. CC commissioned a Tamar Crossings Travel Analysis Study (2017) and PCC and CC have commissioned jointly a SE Cornwall and Plymouth Travel Demand Management Option Study to investigate the potential and possible options for effectively managing travel demand along this strategic transport corridor.</p>	<p>The Council could strengthen the references to the joint working which is ongoing between the two authorities by making the following amendments to the Saltash Chapter:</p> <p><u>New para 13.37 "Cornwall Council and Plymouth City Council share the ambition to increase levels of walking and cycling and recognise the importance of partnership working between the Local Authorities as being essential to try to solve common issues across the travel to work area. The proximity of Saltash to Plymouth, 5 miles, or 42 minutes by bicycle, suggests there is a significant opportunity to encourage an increase in non-motorised trips, in particular bicycle based trips. Although the Tamar Bridge provides a crossing, recent studies suggest there are gaps in network provision on both sides of the bridge, particularly in terms of linking key destinations. It is through this joint ambition that Cornwall Council and Plymouth City Council will seek to develop a sequenced programme of future investment."</u></p> <p>Within Table SlT3, additional comment for Rail Infrastructure (Station frontage and access improvements) to say "<u>Cornwall and Isles of Scilly Local Enterprise Partnership</u></p>
--	-------------------------------	--	--

PS.216a.11

(LEP) have committed £0.5m towards Plymouth's scheme to increase capacity and upgrade passenger facilities at Plymouth station."

Within Table SlT3, additional comment for Rail Infrastructure (Rail service improvements) to say "From December 2018, the Great Western Franchise includes a requirement to provide 2 trains per hour between Plymouth and Penzance including 2 trains per hour calling at Liskeard, St Germans and Saltash stations."

Within Table SlT3, additional comment for Bus Improvement (Bus services and infrastructure/RTPI) to say "Investigate feasibility and demand for a Western Corridor Park and Ride (to/from Plymouth) to help manage demand for travel across the Tamar."

Within Table SlT3, additional comment for Walking/cycling improvements to say "Cornwall Council and Plymouth City Council will continue to work together to develop a prioritised programme of investment to improve walking and cycling links between key destinations in Saltash and Plymouth."

Enhanced para 13.43 (44) to say "Cornwall

Council will continue to work with Plymouth City Council to identify opportunities for managing existing and future demand for travel between Plymouth and South East Cornwall in a sustainable way. The commitment to this joint working is demonstrated by Cornwall Council and Plymouth City Council jointly commissioning in 2017 a South East Cornwall and Plymouth Travel Demand Study, investigating the potential and possible options for effectively and efficiently managing travel demand along the strategic A38 transport corridor across the Tamar. Future improvements could include a western corridor Park and Ride facility and improved cycling infrastructure to serve both the communities of Cornwall and Plymouth."

Specific reference to a Park and Ride having to be delivered through the plan period is not considered appropriate, as our evidence does not demonstrate that a Park and Ride is required between now and 2030 in order to accommodate the growth planned for through the plan period.

PS.216a.11

<p>316 Plymouth City Council</p>	<p>Transport Strategy</p>	<p>Para 13.40. This paragraph could usefully reflect that CC and PCC have submitted a bid to DfT last month (July 2017) for technical support to develop a programme of cycling and walking investment to promote sustainable, active travel opportunities between key destinations in Plymouth and Saltash.</p>	<p>The Council could include the following amendments:</p> <p><u>New para 13.37 "Cornwall Council and Plymouth City Council share the ambition to increase levels of walking and cycling and recognise the importance of partnership working between the Local Authorities as being essential to try to solve common issues across the travel to work area. The proximity of Saltash to Plymouth, 5 miles, or 42 minutes by bicycle, suggests there is a significant opportunity to encourage an increase in non-motorised trips, in particular bicycle based trips. Although the Tamar Bridge provides a crossing, recent studies suggest there are gaps in network provision on both sides of the bridge, particularly in terms of linking key destinations. It is through this joint ambition that Cornwall Council and Plymouth City Council will seek to develop a sequenced programme of future investment."</u></p> <p>Within Table SlT3, additional comment for Walking/cycling improvements to say <u>"Cornwall Council and Plymouth City Council will continue to work together to develop a prioritised programme of investment to improve walking and cycling links between key destinations in Saltash and Plymouth."</u></p>
--	-------------------------------	--	--

PS.216a.11

<p>316 Plymouth City Council</p>	<p>Transport Strategy</p>	<p>Para 13.41. Reference in the table to rail improvements and Western Park and Ride is insufficient. The fact that PCC and CC have just commissioned jointly a SE Cornwall and Plymouth Travel Demand Management Study demonstrates that we are more than just exploring opportunities but actually doing the work. This should included as part of the Saltash Chapter. See 13.43 below.</p>	<p>The Council could strengthen this aspect of the Saltash Chapter:</p> <p>Within Table SlT3, additional comment for Rail Infrastructure (Station frontage and access improvements) to say "<u>Cornwall and Isles of Scilly Local Enterprise Partnership (LEP) have committed £0.5m towards Plymouth's scheme to increase capacity and upgrade passenger facilities at Plymouth station.</u>"</p> <p>Within Table SlT3, additional comment for Bus Improvement (Bus services and infrastructure/RTPI) to say "<u>Investigate feasibility and demand for a Western Corridor Park and Ride (to/from Plymouth) to help manage demand for travel across the Tamar.</u>"</p> <p>Enhanced para 13.43 (44) to say "<u>Cornwall Council will continue to work with Plymouth City Council to identify opportunities for managing existing and future demand for travel between Plymouth and South East Cornwall in a sustainable way. The commitment to this joint working is demonstrated by Cornwall Council and Plymouth City Council jointly commissioning in 2017 a South East Cornwall and Plymouth Travel Demand Study, investigating the</u></p>
--	-------------------------------	--	---

			<p><u>potential and possible options for effectively and efficiently managing travel demand along the strategic A38 transport corridor across the Tamar. Future improvements could include a western corridor Park and Ride facility and improved cycling infrastructure to serve both the communities of Cornwall and Plymouth."</u></p> <p>It should be noted however that our evidence does not demonstrate that a Park and Ride is required between now and 2030 in order to accommodate the growth planned for through the plan period.</p>
<p>316 Plymouth City Council</p>	<p>Transport Strategy</p>	<p>Paragraph 13.43. Inclusion of a reference to the western corridor park and ride is warmly welcomed. Nevertheless, we would raise a concern about the level of commitment implied. Given the points raised in paragraph 13.36 and my comments above, I would suggest that the park and ride is one response to the wider strategic cross boundary issue of transport movements between Plymouth and SE Cornwall, and therefore would be a key strategic element of Cornwall's transport strategy to unlock growth potential in SE Cornwall well before 2030. It would clearly represent a major improvement to public transport links between Saltash and Plymouth contributing to reducing car trips over the crossings – which has been highlighted as a problem for the area. The transport networks in SE Cornwall are part of the wider</p>	<p>The Council disagrees that a Park & Ride facility is required in order to support the planned growth for the period to 2030. However, acknowledging the likely longer term need, the Council is happy to strengthen the Saltash Chapter as follows:</p> <p>Within Table Slt3, additional comment for Bus Improvement (Bus services and infrastructure/RTPI) to say "<u>Investigate feasibility and demand for a Western Corridor Park and Ride (to/from Plymouth) to help manage demand for travel across the Tamar.</u>"</p> <p>Enhanced para 13.43 (44) to say "<u>Cornwall Council will continue to work with Plymouth</u></p>

Plymouth TTWA transport networks, and therefore Transport issues in SE Cornwall cannot be considered in isolation from those in Plymouth. We would therefore ask that it is described as a joint project benefitting residents of Plymouth and SE Cornwall, and that it should be included in Table Slt3 reflecting the importance placed on the park and ride in the City Council's INA, and in the Plymouth and South West Devon JLP (which was submitted in July 2017)

City Council to identify opportunities for managing existing and future demand for travel between Plymouth and South East Cornwall in a sustainable way. The commitment to this joint working is demonstrated by Cornwall Council and Plymouth City Council jointly commissioning in 2017 a South East Cornwall and Plymouth Travel Demand Study, investigating the potential and possible options for effectively and efficiently managing travel demand along the strategic A38 transport corridor across the Tamar. Future improvements could include a western corridor Park and Ride facility and improved cycling infrastructure to serve both the communities of Cornwall and Plymouth."