



INSP.S4 Matter 8 St Austell & The Carclaze and Par Docks Eco-Communities Spatial Strategy & Allocations

Cornwall Council Position Statement

02 February 2018

a. Is the strategy for St Austell consistent with the LPSP?

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

LPSP CNA Objectives	Comments
<p>Objective AU1 – New Development Identify the locations for new growth to provide a range of housing, employment and other facilities</p>	<p>A comprehensive assessment (the housing and employment evidence base documents) informed the location of the site allocations at Trewiddle (incl. STA-M1 and M2) for housing and employment, and for employment east of the town at Par Moor STA-E3. These were the most appropriate locations in planning terms and were endorsed by the local community</p>
<p>Objective AU2 – Affordable Housing Promote the delivery of affordable housing</p>	<p>The SADPD has identified two sites (STA-M1 & M2) on which affordable housing will be delivered, to ensure the LPSP housing target can be achieved. These adjoin the recent permission of the Trewiddle farm proposal. There are a number of permissions in place which will provide affordable housing.</p>
<p>Objective AU3 – Economy Support the regeneration of the local economy and the town centre</p>	<p>The SADPD has allocated a site at Old Vicarage Place, which represents the best town centre option linking with the existing White River Place while supporting other regeneration aspirations for the town. Office space is allocated on both STA-M1 & M2 and industrial at STA-E3</p>
<p>Objective AU4 – Infrastructure Enable the delivery of community infrastructure including new community facilities and in particular addressing transport congestion issues and links to the A30</p>	<p>The Transportation Strategy at para 9.53 sets out a range of measures including sustainable measures and capacity improvements aimed at addressing congestion; it also highlights the A30 link road proposal at para 9.59. The SADPD includes a section on future education provision (paras 9.44 and 9.45) to ensure appropriate capacity is provided to support the targeted housing growth.</p>
<p>Objective AU5 – Environment Conserve the south coast AONB, the World Heritage Site at Charlestown and other heritage assets, and maintain green corridors between settlements to preserve community identity and biodiversity</p>	<p>The SADPD strategy sets out a specific strategic aim at para 9.78 to 'protect the identity of settlements within the town's hinterland. Furthermore para 9.11 sets out that growth needs to be undertaken sensitively, to protect landscapes and to ensure that separate identities of communities within the towns hinterland are maintained. Green buffers are also proposed at para 9.69 to maintain separate identities of surrounding communities. The setting of</p>

	the WHS informed the identifications of the green buffer proposed on the GI strategy map at Fig STA4. The AONB is located some distance from the town and more relevant to rural coastal areas not with the SADPD.
<p>Objective AU6 – Flooding Consider flooding issues, particularly at Mevagissey, Pentewan and in the Sandy Hill and Holmbush areas of St Austell</p>	The St Austell strategy has been informed by the SFRA within the SADPD evidence base. There are flood zone considerations within site allocation policies STA-M1 and STA-E3, informed by the SFRA as part of the DPD evidence base. The infrastructure section of the SADPD also references the STARR project at para 9.52 which is focussing on strategic flood attenuation schemes including the Sandy River in St Austell.

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

Yes. The Council has provided an updated position (as at 1/4/17) to supplement the data that was provided at the time of submission (which was based on figures as at 1/4/16). This updated information is set out in the Council's response to the inspectors' questions – INSP.S6 (CC.S4.4).

- c. Is the approach to the selection of sites for allocation consistent with Strategy, including with respect to the use of previously developed (brownfield) and greenfield (agricultural) land?

Yes. As set out in the St Austell Housing evidence document (D17.1), the Council first sought to identify appropriate sites within the existing urban to help meet the growth targets set by the LPSP. Only after this did the Council seek to allocate greenfield sites on the edge of the settlement. The Council did not consider it necessary to allocate many sites identified within the existing urban area because they were either very small and/or the policies within the LPSP document provided sufficient support to enable them to come forward. Furthermore the majority of the larger brownfield opportunities within St Austell have already been built out or are subject to an existing planning permission. This is reflected in the relatively significant level of completions and permissions since 2010.

The St Austell Housing Evidence Base Report (D17.1) sets out the detailed assessment process that took place in considering greenfield options. This included mapping of environmental designations; landscape character assessment, and accessibility mapping. This process assisted, in combination with the Sustainability Appraisal, in identifying the most sustainable options for the Plan, and the preferred direction of growth to the south west of the

town at Trewiddle, with good accessibility to the town centre and related facilities.

Consideration of Grade 2 and Grade 3 agricultural land was reflected within the assessments undertaken to select sites, and summarised within the Sustainability Appraisal. On balance the benefits that the sites offered outweighed the small loss of agricultural land, compared with the total quantum within Cornwall.

- d. Are Green Buffers west of Carclaze Road appropriate with respect to the strategy and necessary in planning terms?

The Council believes that the green buffer area west of Carclaze Road is appropriate in respect to the development strategy for the town, and necessary in planning terms. The main reasoning and justification for the buffer area is as follows:

The adopted Open Space Strategy (E5) for St Austell at para 181 states the following *"...we would recommend that opportunities be better protected and public access and usability be improved to spaces such as ..."* 4th bullet point: *"on land adjoining the North East Distributor road"*. There are two remaining undeveloped opportunity areas adjoining the North East Distributor Road; these are therefore included within the larger linear green buffer area adjacent to Carclaze Road, together with existing amenity and sports spaces in-line with this adopted open space objective for St Austell.

Within the St Austell GI strategy of the SADPD, para 9.69 states *"...a further green buffer is identified on the eastern edge of St Austell, along the A391 corridor, as this represents a logical boundary to the town; an important biodiversity corridor; plus parts offer amenity value to the residents"*

In historical terms the area adjoining the A391 has a planning policy background which sought to restrict built development in certain areas through a landscape policy as follows:

Within the Restormel Borough Local Plan (2001 - 2011), criteria 1 of Policy SA2 on Landscaping, stated *"(1) Land between the Proposed (at that time) North East Distributor Road and the eastern development envelope of St Austell and between the proposed road and the playing fields of Trenowah Road is proposed for landscaping and screening"*. The accompanying Plan explanatory text stated:

"it is considered important to provide an appropriate visual and noise buffer between the proposed new road and the final built up area of St Austell"...the text goes on to clarify: *"provision of a bypass/distributor road carries no implication that development should then be allowed up to the new road"*. Policy SA2 was shown as a buffer area on the proposals maps. The buffer area was similar although slightly smaller than the buffer area now proposed within the SADPD; which includes a further area to the north to reflect the recommendations of the Open Space Strategy.

It is felt the above considerations justify the identification of a green buffer area West of Carclaze Road within the SADPD strategy for St Austell, in the context of developing a locally specific strategy that it is necessary in planning terms and supported and endorsed by local Cornwall Councillors and representatives (that sit on the St Austell Steering Group who informed and endorsed the St Austell section of the Plan).

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

There are no landscape or environmental designations contained within the site allocations. The St Austell Housing Evidence Base Report (D17.1) mapped and considered all environmental designations in identifying site options.

The Air Quality Management Area for St Austell covers the built area of the town, including the development proposals within the SADPD. Issues relating to air quality are recognised within the SADPD, at para 9.8 a specific strategy aim is to "*manage and improve air quality*", and at para 9.42 it explains that the delivery of a new link road at Pentewan will "*help to alleviate congestion of the A390*". Various transport measures are set out within the Transportation Strategy to help address wider impacts from development which are listed in table St3 of the SADPD. Para 9.63 states that the proposed sustainable transport measures will not only help address highways impacts offering alternatives to the car, but will also "*positively contribute to the future management of air quality within the town*".

There are two allocations that include flood zones 2 and 3, STA-M1 and STA-E3. Built development is located outside of these zones and there are specific flood related considerations within each allocation policy. Both of these policies were informed by the SFRA (D4). Policy 26 of the Cornwall LPSP ensures that development will need to implement an appropriate SUDS scheme ensuring no adverse effects downstream. This requirement is also referenced in the GI strategy text at para 9.74

- f. Is there robust provision for the necessary supporting infrastructure for the Eco-towns, including with respect to education, sports facilities and highways?

Outline planning permission for a mixed used community of up to 1,500 homes was approved (March 2017) at the West Carclaze site subject to section 106. The Councils track record of delivering and enabling infrastructure for the Eco-communities is well proven, including: The Carludon A391 road improvement which opened in 2015; in December 2017 there was a positive decision from DfT to fund the delivery of the St Austell to A30 link road (including £79m of DfT funding); the first phase of

the Technology Park, which sits within the West Carclaze site, is also under construction.

West Carclaze is part of the Ministry of Housing, Communities & Local Government Garden Village Programme and the Council has received capacity funding to support delivery at the site. It will provide dedicated CC Officer capacity to work with Eco-bos (the developer) to support delivery and to assist with securing infrastructure such as the primary school, sewerage, energy strategy and establishing the Land Trust.

In response to the inspectors questions INSP.S2 (Q10), the Council set out the core infrastructure requirements necessary to support the growth within towns, and in relation to the Eco-communities sites.

- **Transportation:** The strategy measures were based upon the St Austell Transport Evidence base (D17.4). Other transport assessment work has taken place in connection with the planning application PA14/12186, plus previous transport work undertaken supporting the delivery of the Carluddon A391 Road Improvement.

Para 10.23 states that the proximity of the sites to St Austell will have an impact on the towns highways network and that the *“St Austell section sets out the key projects within the town that the eco-community developments need to address”*. As para 10.22 explains *“proposals are already in place to deliver a new A30 link road”* which will address future capacity constraints on surrounding villages. The list of projects within the St Austell and eco-community sites areas are set out in Table St3 of the SADPD.

- **Education:** An evaluation of the demand for school places generated by the proposed growth within St Austell and the Eco-Community was undertaken jointly by the Council’s Planning Service and its Education Service, (summarised in paras 9.44 and 9.45 of the St Austell section) and set out in para’s 10.19 and 10.20 of the SADPD. These paragraphs also set out the proposed actions to address the shortfall, including the provision of a new (free) primary school at West Carclaze. Detailed discussions are ongoing with DfE, subject to progressing through the detailed information aspects of the free school process the school could open in September 2020. (<http://www.skyaceacademyandnursery.co.uk/web>). Appendix 3 of the Council’s response to INSP.S2 (CC.S3.3) summarises the proposed schemes, their estimated costs; and the actions that have been undertaken to support their delivery.
- **Open Space:** Para 10.26 explains that due to the nature of the regeneration focus the standard formula for creation of new open space at West Carclaze is inappropriate, and that all land not taken forward as built development should be regenerated as open space.

West Carclaze covers 216ha of which 53ha will accommodate built development and 160ha being a heritage park.

- g. Is there robust evidence that the allocated sites and infrastructure will be delivered at a sufficient rate and to a suitable timescale to ensure that the minimum numerical development requirements of the Town Strategy and of the adopted LPSP will be met, including with reference to the five year housing land supply required by national policy?

The St Austell area already benefits from a significant proportion of its housing target either being completed (1,209) or permitted (1,370 (net)), as at 1/4/17; this represents 89% of the target.

As set out in answering the inspectors questions (INSP.S6 question (17) in CC.S4, the Council provided updated statistics with regard to its housing supply position, which is set out in Table A(ii) within Appendix 4 (CC.S4.4) of the Council's response. An extract of Table 1a, is set out below.

Area	Local Plan Target	Delivery Total		Delivery against Target	
		Gross	Net	Gross Delivery against Target	Net Delivery against Target
a	b	o	p	q	r
St Austell	2,900	3,305	3,076	114%	106%

This showed that the various sources of delivery (Completions / Permissions / Urban SHLAA / Windfall / CLI & Other / Allocations) could provide 3,305 dwellings (Gross) and 3,076 (Net) within the Plan period. This represents 114% of the LPSP housing target.

The largest part of the Trewiddle urban extension area has planning permission (PA14/12161). This site was identified as the preferred direction of growth for the town; STA-M1 and STA-M2 are allocated to complete the proposal. STA-M2 is Council owned the Council are looking to bring forward a scheme. Also discussions have taken place with the developer and land owner in bringing forward a proposal on STA-M1.

As a result, there is sufficient identified supply of sites to ensure the LPSP housing target for St Austell is met, plus the other infrastructure considerations set out below assist in demonstrating deliverability.

In response to the inspectors questions INSP.S2 (Q10), in CC.S3 and its appendices the Council set out the core infrastructure requirements necessary to support the growth within towns. In relation to St Austell:

- **Transportation:** The strategy measures were based upon the SADPD St Austell Transport Evidence. This resulted in various projects being identified which are set out in Table St3 of the SADPD. Appendix 1 of the Council's response to the inspectors questions (CC.S3.1) sets out the projects still to be delivered, together with their cost and estimated timescale for delivery, although these timescales can alter depending upon timing of delivery of sites and grant funding opportunities. For example the table sets out the project start dates and project completion dates for the Trewiddle link road and related Edgumbe Triangle improvements (within Council ownership) in the short term to ensure deliverability. Funding was secured for the A30 link road in late 2017.
- **Education:** An evaluation of the demand for school places generated by the proposed growth within St Austell was undertaken jointly by the Council's Planning Service and its Education Service, summarised in paras 9.44 and 9.45 of the SADPD. These paragraphs also set out the proposed actions to address the shortfall. Appendix 3 of the Council's response to INSP.S2 (CC.S3.3) summarises the proposed schemes, their estimated costs; and the actions that have been undertaken to support their delivery and the current position regarding capacity, which helps to show that there is currently capacity within St Austell's schools to take growth in the short to medium term. Expansion of Charlestown primary was completed in 2016; expansion at Sandy Hill Primary is under construction; and a new free school is proposed at West Carclaze.
- **Open Space:** Each policy has the level of open space that should be provided and whether this should be in the form of on-site provision, or as an off-site contribution. As set out in answer to the Inspectors question INSP.S2 (Q10), on-site delivery of open space for allocations sites will be delivered via s106 agreements; whereas improvements to existing open spaces, together with wider biodiversity enhancements, will be dealt with through contributions secured from non-allocated development, through the Council's Community Infrastructure Levy.

Funding to enable the delivery of necessary infrastructure will be secured from a range of sources:

- **Developer Contributions** – Site allocations are exempt from CIL, so will be secured through s106 agreements.
- **Council sponsored funding bids** – Cornwall Council has an excellent record of securing grant funding to support the delivery of infrastructure that will enable growth.
- **Cornwall Council Investment Programme** – Cornwall Council is developing an Investment Programme, which in part will support the delivery of key infrastructure. This will include the Council's traditional investment (e.g. investment without a return), as well as sometimes

investing in infrastructure from which developers will pay some/all of the money back at a later date; enabling early delivery of critical infrastructure, helping ensure blockages to delivery are minimised.