



## Representations

# Camelford Neighbourhood Plan

Client: Wainhomes (South West) Holdings Limited

Consultation stage: Regulation 14

Project : 6412  
Plan : Camelford  
Neighbourhood Plan  
Stage : Regulation 14  
Date : July 2019  
Author : John Coxon

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## 1. Introduction

- 1.1 Emery Planning is instructed to submit representations to the Camelford Neighbourhood Plan (hereafter referred to as the 'CNP') on behalf of the Wainhomes (South West) Holdings Limited (hereafter referred to as 'Wainhomes').
- 1.2 Wainhomes' specific interest is the land west of Farriers Green, Valley Truckle. A site location plan is appended at **EP1**. We are promoting the site as a sustainable urban extension to the town, which could make a valuable contribution to the supply of housing and employment land. Part of the site is included within a Business Area of Search in the Draft CNP.
- 1.3 In summary, we support the production of the CNP, and it is clear that the Neighbourhood Plan Team has made significant strides in its production of the Neighbourhood Plan. However, we consider that a number of changes to the plan are needed to ensure that it meets the basic conditions. In particular, we consider that greater flexibility is needed in respect of the employment area of search to allow housing development to come forward which can enable the delivery of employment land to meet the development requirements set by the Cornwall Local Plan.
- 1.4 We would very much welcome further discussions with the Town Council to discuss the emerging CNP, and in particular the potential development of the land west of Farriers Green as part of the Business Area of Search. Wainhomes is currently preparing a masterplan for a mixed use development across the site, and therefore this would appear to be an ideal time to meet to discuss the proposals for the site.
- 1.5 Our detailed representations are set out below, under the following key headings:
  2. The Basic Conditions
  3. National Planning Policy and Guidance
  4. The Development Plan
  5. Response to the draft policies
  6. Summary and conclusions

## 2. The Basic Conditions

2.1 The basic conditions are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by Section 38A of the Planning and Compulsory Purchase Act 2004. The basic conditions are:

- a. having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).
- b. having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order. This applies only to Orders.
- c. having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order. This applies only to Orders.
- d. the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.
- e. the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).
- f. the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.
- g. prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).

### 3. National Planning Policy and Guidance

#### National Planning Policy Framework ('the Framework')

3.1 The current version of the Framework was adopted in February 2019. Paragraph 29 states:

*“Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies.”*

3.2 Footnote 16 of the Framework confirms that “Neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area.”

3.3 Paragraph 37 of the Framework states:

*“Neighbourhood plans must meet certain ‘basic conditions’ and other legal requirements before they can come into force. These are tested through an independent examination before the neighbourhood plan may proceed to referendum.”*

3.4 Footnote 21 of the Framework confirms that the basic conditions are set out in paragraph 8 of schedule 4B of the Town and Country Planning Act 1990 (as amended) as referred to in section 2 of this statement above.

#### National Planning Practice Guidance (PPG)

3.5 The PPG was launched in March 2014. It replaced a number of practice guidance documents that were deleted when the PPG was published. Section 41 includes guidance on Neighbourhood Planning.

## 4. The Development Plan

4.1 Neighbourhood Plans must be in general conformity with the strategic policies of the wider local area, which in this instance are set out within the Cornwall Local Plan.

### Local Plan: Strategic Policies (LPSP)

4.2 The LPSP was adopted in November 2016. It is not an allocations plan, and therefore the allocation of sites to meet the requirements set out within the Local Plan will be through the emerging Site Allocations DPD or a Neighbourhood Plan.

4.3 Policy 2 (Spatial Strategy) sets out the overarching strategy for new developments across Cornwall. It seeks to provide homes and jobs based on the role and function of each place. This also includes the strategic scale of growth to be accommodated in the main towns (including Camelford) where they can best support regeneration as sustainable development.

4.4 Policy 2a (Key Targets) sets out the overarching housing requirement for Cornwall and then the proposed distribution across the key towns and community network areas. Part 1 of the policy states that a minimum of 52,500 homes are to be delivered at an average rate of about 2,625 per year. This requirement does not include the need for gypsy and travellers, student bed spaces or communal establishments. Those are over and above the housing requirement of 52,500.

4.5 For Camelford, the housing requirement is 375 dwellings with a further 625 dwellings in the remainder of the Camelford Community Network Area (CNA). The total therefore for the Camelford CNA is 1,000 dwellings.

4.6 Policy 2a also distributes 3,917sqm B1a and B1b office floorspace, and 3,917sqm other B employment floorspace, to the Camelford CNA.

4.7 Policy 3 (Role and Function of Places) sets out the distribution of development according to a settlement hierarchy. Part 1 of the policy states that delivery of housing, community, cultural, leisure, retail, utility and employment provision will be managed through a Sites Allocations DPD or Neighbourhood Plans. Camelford is one of the key locations set out. Part 2 of the policy specifically recognises that development will be at, or well related to, those named towns and

they are to provide an appropriate level of affordable housing in accordance with the requirements of policy 8.

- 4.8 Table 1 sets out the apportionment of local plan housing provision (as at 31<sup>st</sup> March 2016). For Camelford this sets out the overall requirement of 375. Within that figure, there were 128 completions between 2010 and 2016, 65 dwellings with planning permission not started or under construction, and an allowance has been made for 54 on windfall sites less than 10 dwellings between the period 2021 and 2030. This leaves a residual requirement for 128 dwellings<sup>1</sup>.
- 4.9 Policy 5 (Jobs and Skills) states that flexibility is crucial for the delivery of economic growth to stimulate new jobs and economic growth. This is to be achieved through well integrated provision with our city, towns and villages, be well served by public transport and a scale appropriate to its location.
- 4.10 Table 3 (Local Plan Employment Floorspace Requirements 2010 – 2030) sets out the targets for each community network area, the completions and commitments at 2015. For Camelford, it states that there is a need for 3,917sqm of office space between 2010 and 2030. The table then states that at 1 April 2016 there had been a net loss of -299sqm, and commitments only totalled 89sqm. Table 3 also identifies a need for 3,917sqm of industrial space between 2010 and 2030. At 1 April 2016, there had been completions totalling 2,694sqm, and 6,126sqm was committed<sup>1</sup>.
- 4.11 Policy 6 (Housing Mix) seeks to ensure new developments of 10 dwellings or more should include an appropriate mix of house sizes, type, price and tenure to address identified needs and market demand to support mixed communities.
- 4.12 Policy 7 (Housing in the Countryside) states that additional accommodation to meet housing needs in the open countryside will be permitted where there are special circumstances and development will be restricted to replacement dwellings, subdivision of existing dwellings, reuse of suitably redundant disused or historic buildings or agricultural workers.
- 4.13 Policy 8 (Affordable Housing) states that all new housing schemes where there is a net increase of more than 10 dwellings or where dwellings have a combined gross floorspace more than 1,000sqm must contribute towards the affordable housing need. Camelford is located within zone 4 and therefore the affordable housing requirement is 30%.

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<sup>1</sup> These figures have been updated by Cornwall Council in the Annual Monitoring Report 2018, as referred to in Section 5 of this statement



- 4.14 Policy 13 (Design) states that the council is committed to achieving high quality safe, sustainable and inclusive design in all developments and sets out a number of fundamental design principles.
- 4.15 Policy 14 (Development Standards) seeks to ensure that development achieves the provision of sufficient internal space, public open space, off street parking, a space for the collection of waste recycling, and energy consumption.
- 4.16 Policy 15 seeks to increase the use and production of renewable and low carbon energy generation.
- 4.17 Policy 17 (Health and Wellbeing) seeks to improve the health and wellbeing of Cornwall's communities. This seeks to ensure that development protects and alleviates risk to people and environment from unsafe, unhealthy and polluted environments by avoiding and mitigating against harmful impacts and health risks such as air and noise pollution and water and land contamination.

#### Emerging Site Allocations Development Plan Document (SADPD)

- 4.18 The emerging SADPD identifies where new housing and employment uses will be delivered for 10 towns/conurbations and two eco-communities in Cornwall. However the document does not address allocations in Camelford due to the presence of the emerging Neighbourhood Plan.
- 4.19 The emerging SADPD is yet to be adopted. The progress of the SADPD is set out below:
- The SADPD was submitted for examination on 31 October 2017.
  - The Examination Hearings were held between February and April 2018.
  - Main modifications were then consulted upon between September and October 2018.
  - The Inspector's report was published on 10 April 2019.
- 4.20 The SADPD should therefore be adopted in the near future, in advance of the CNP. It is therefore important that the CNP is in general conformity with the strategic policies contained in the SADPD.
- 4.21 Policy 1 of the SADPD states:

*“Housing growth will be delivered for the settlements named in the Site Allocations DPD through the policies in this plan and through:*

- 1. Existing sites with planning permission that can help contribute in a timely manner to the housing supply;*
- 2. Infill development that does not physically extend into the open countryside or diminish a large gap that is important to the setting of the settlement;*
- 3. Small scale rounding off that is appropriate to the size and role of the settlement and does not physically extend development into the open countryside;*
- 4. The development of previously developed land within or adjoining the named settlements.”*

4.22 Policy 1 therefore applies to the settlements named in the Site Allocations DPD. However the justification for the policy is that sufficient allowance needs to be made for windfall development in all of the main towns. Paragraph 1.11 of the SADPD states:

*“Windfall Development - The intention of the Site Allocations DPD is to identify the strategic sites in the main towns to enable the delivery of the LPSP housing and commercial apportionments; however it is also expected that the ongoing delivery of the LPSP housing target requires delivery on unplanned (windfall) sites in the main towns including the towns named in the Site Allocations DPD. To reflect the criteria established within Policies 3 and 21 of the LPSP the windfall development element of the housing requirement for towns can be provided through:*

- 1. Existing sites with planning permission;*
- 2. Infill development;*
- 3. Small scale rounding off;*
- 4. The development of previously developed land within or adjoining the named settlements.” (our emphasis)*

4.23 Paragraph 12 of the Inspector’s report also provides:

*“In response, the Council provided confirmation that the residual development requirements set for each CNA by the adopted LPSP are intended to be delivered by Neighbourhood Plans (NPs) agreed by local communities and supported by a dedicated Cornwall Council team, **as well as** by rounding off, infill and exception sites maintaining a windfall contribution (considered further under Matter 1 below).” (our emphasis)*

4.24 It is therefore necessary for the CNP to provide a policy framework which is sufficiently flexible to allow windfall sites to come forward to meet the LPSP housing requirement.

## 5. Response to draft policies

### Policy 1A – Camelford Development Boundary

- 5.1 The housing requirement for Camelford established in the LPSP is 375 dwellings. At 1 April 2018 there had been 185 completions, and there were 78 dwellings with planning permission not started or under construction, and an allowance has been made for 42 dwellings on windfall sites less than 10 dwellings between the period 2023 and 2030. Without any critical analysis of the deliverability of existing commitments, this still leaves a residual requirement of 70 dwellings. We consider that at least one additional allocation is required to meet this need. Our client's site (land west of Farriers Green, Valley Truckle) is suitable and available to meet this need.
- 5.2 Notwithstanding the above, to meet the overall LPSP housing requirement, Cornwall Council is reliant upon unplanned (windfall) sites in the main towns. The stated intention of the boundary is to clearly define where infill, rounding off and development of previously developed land can take place. However, as drafted the proposed boundary in the CNP is tightly drawn around the settlement, and would prevent windfall sites (of the type envisioned in Policy 1 of the SADPD) from coming forward.
- 5.3 We therefore consider that a more flexible approach is required, which provides for infill and rounding off outside of the identified development boundary. Furthermore, as it is clear from the constraints and Regions of Search identified within the plan that any future growth will be to the west of the settlement, the policy should also specify that such developments should be in that direction.

### Policy 1B – Affordable Homes

- 5.4 We support the objective of providing for exception sites which can deliver at least 50% affordable housing in accordance with LPSP Policy 9. However, it is not clear what justification there is for applying Policy 1B to such a small geographical area adjacent to Camelford. As we set out below in our response to Policy 2A, our client is promoting land within one of the Business Regions of Search. The site would also be suitable for delivering housing as part of a mixed use development, and as such can contribute to meeting the identified need for additional affordable housing.

### Policy 1C – Heritage Impact on new housing

- 5.5 Part b of the policy states that development “*must not impact on heritage assets of Camelford*”. This does not reflect the tests set out within national planning policy at paragraphs 193-202 of the Framework. We recommend that this criterion is deleted, or replaced by a reference to the Framework.

### Policy 1D – Housing Development and Design

- 5.6 Criterion 9 of the policy states:

*“Valley Truckle area has seen extensive development, and CTC will therefore not support any new residential development in this area exceeding 10 properties.”*

- 5.7 There is no justification for this approach beyond the fact that the area has been subject to relatively recent new development. This in itself is not a good reason for restricting new development. The plan as currently drafted identifies an area of search for business development to the west of Valley Truckle, including our client's land. This contradicts the suggestion that new development should be restricted within Valley Truckle. There are no specific reasons given as to why employment development is acceptable, but residential is not.
- 5.8 Furthermore, criterion 6 of the ‘policy intention’ text only refers to safeguarding against over-development within the Development Boundary. As currently drafted the policy itself is inconsistent with the intended purpose, if it is to be interpreted to restrict development outside of that boundary.
- 5.9 Criterion 15 of the policy refers to garden sizes, and references design guidance from other authorities. We consider that the policy should clarify that the sizes provided represent guidance rather than a fixed policy requirement, as clearly meeting such standards will not be necessary or appropriate in all cases.

### Policy 2A – Economy and Employment

- 5.10 We support the identification of part our client's site within a ‘Business Region of Search’. However, we consider that amendments are necessary to Policy 2A to ensure consistency with the strategic policies of the development plan, and to ensure that the plan contributes to the achievement of sustainable development.

- 5.11 Firstly, greater certainty is required to demonstrate how the employment land requirement for Camelford will be met. Policy 2A of the LPSP identifies a need for 3,917sqm of office space between 2010 and 2030 in the Camelford CNA, of which the town must be expected to accommodate the majority of the requirement. However at 1 April 2018 there had been a net loss of office space of -1,121sqm, and commitments only totalled 816sqm<sup>2</sup>. Therefore the residual requirement is 4,222sqm (net) of office floorspace, to be delivered by 2030. There may need to be further provision made to account for the likelihood of any future losses, which appears likely based upon recent trends.
- 5.12 The CNP should therefore specifically identify this requirement and address how it will be delivered. In this regard we consider that specific allocations are required, as are provided in the Cornwall SADPD. The deliverability of these allocations also needs to be considered, including an assessment of viability.
- 5.13 Secondly, we consider that a greater degree of flexibility is necessary in order to enable the delivery of the required quantum of business floorspace. In particular, we consider that the required scale of scale of employment development is only likely to come forward if it is part of mixed use developments which enable the delivery of office space. Such an approach could assist in delivering much needed affordable housing. In addition, mixed use developments could also make financial contributions towards the future delivery of the bypass. Clearly to enable such contributions it will be necessary for development to be of a sufficient scale that contributions are viable.

#### **Camelford Design Guide: Business Region of Search**

- 5.14 Criterion 2 of Policy 2A of the CNP states that development proposals must set out how they comply with the Camelford Design Guide (Section 3, Appendix 2). Paragraph 3.1 of the Design Guide is therefore applicable. We comment below on the specific requirements.
- 5.15 Criterion a(i) requires the inclusion of appropriate vehicular access directly from the proposed bypass. Whilst our client does not object to the provision of a new bypass, it is important to note that the office space requirements must be met by 2030 irrespective of whether the bypass is delivered or not. We are not aware that there is currently funding in place for the

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<sup>2</sup> Cornwall Annual Monitoring Report 2018, page 10

bypass, and there is no certainty that it will be delivered by 2030. Therefore at the present time the policy must not place a restriction on development linked to the provision of the bypass.

- 5.16 Furthermore, there is no technical evidence to suggest that additional development cannot be accommodated on the highways network without the proposed bypass, and in this regard each proposal will need to be considered on its own merits.
- 5.17 We therefore recommend that criterion a(i) is amended to state that all new business development should not prejudice the future delivery of the bypass, and any proposals should be designed with a view to linking into the bypass if and when it is delivered in the future.
- 5.18 Criterion b(ii) requires unit/building design to include the use of sustainable building technology and efficiency measures. Clarification is required as to exactly what measures are being sought.
- 5.19 Criterion e requires businesses to support the vitality and viability of the town centre. It is not clear as to precisely what the policy is expecting in this regard, and how this could be achieved.

## 6. Proposed allocation – Land west of Farriers Green, Valley Truckle

- 6.1 Wainhomes' specific interest is the land west of Farriers Green, Valley Truckle. A site location plan is appended at **EP1**. We are promoting the site as a sustainable urban extension to the town, which could make a valuable contribution to the supply of housing and employment land.
- 6.2 The site was subject to a planning application for up to 89 dwellings submitted in April 2017 (LPA ref: PA17/03148). The application was refused on 20 September 2017. The application was refused for 4 reasons relating to conflict with Policy 3 of the LPSP, noise pollution from wind turbines, insufficient information in relation to ecology and the absence of a Section 106 agreement. Reasons for refusal 2-4 are technical matters which can be addressed through amendments to the proposed development and the provision of additional information. Reason for refusal 1 was a policy matter which effectively required that the allocation of the site be considered through the CNP. The site is therefore put forward for an allocation on that basis.
- 6.3 As we have identified above, the Annual Monitoring Report identifies a residual requirement for Camelford of 70 dwellings to 2030. The site is suitable and available for meeting this need.
- 6.4 Part of the site is included within the Business Region of Search in the Draft CNP. The identification of this site within the Business Region of Search is supported. The site is capable of accommodating B1 employment space and/or other B uses. This could include premises for high technology industries; for example to accommodate emerging businesses related to the Spaceport proposals at Newquay airport.
- 6.5 However as we have set out in our above representations to Policy 2A, we consider that flexibility is required within the policy to allow for housing to come forward as part of mixed use development. This could enable the delivery of the minimum employment land requirement to 2030, whilst also delivering much needed affordable housing and potentially financial contributions towards a future bypass.

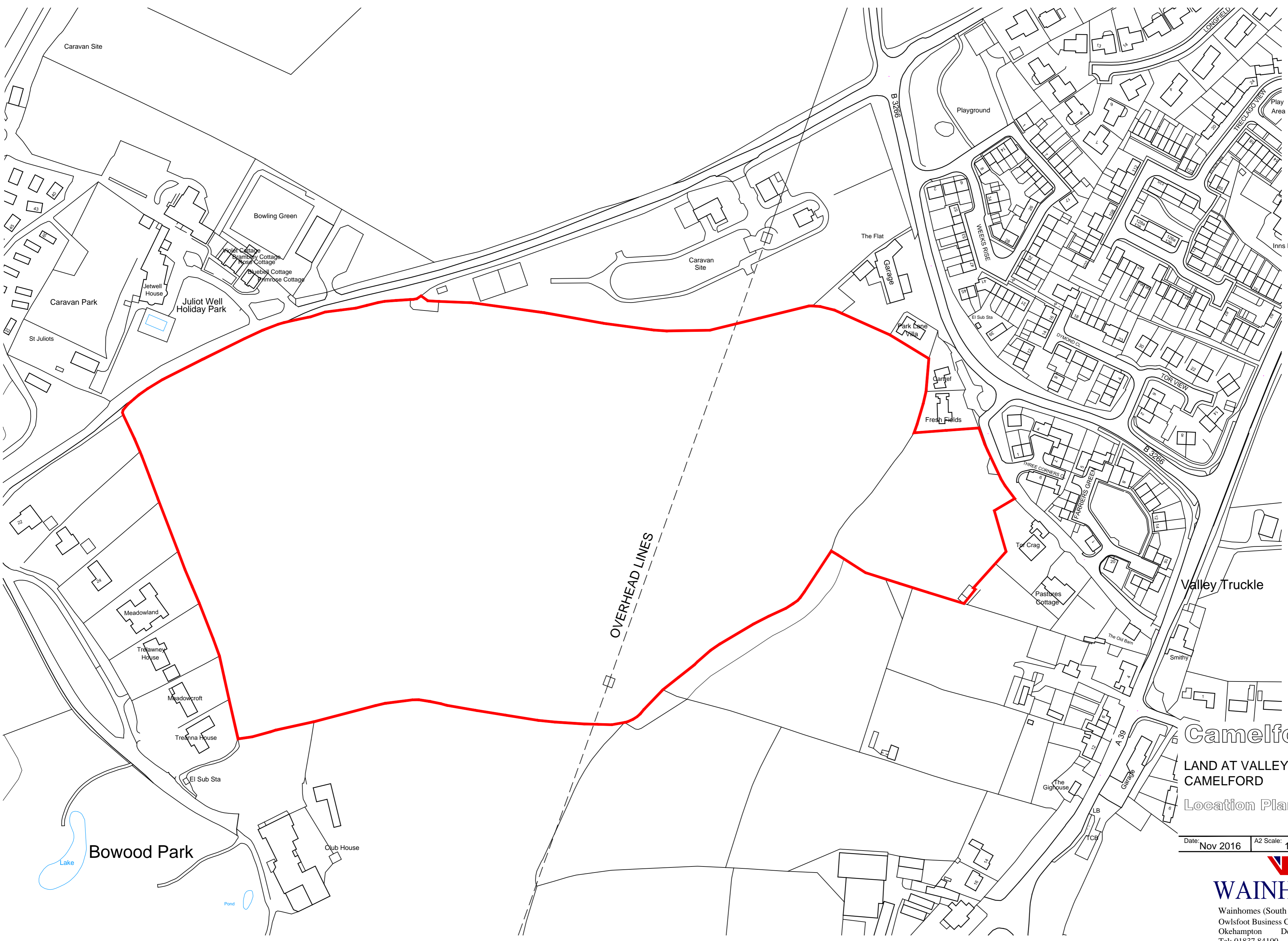
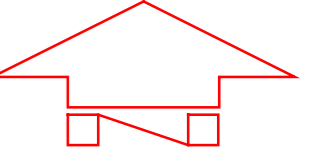
## 7. Summary and conclusions

- 7.1 We support the production of the CNP, and it is clear that the Neighbourhood Plan Team has made significant strides in its production of the Neighbourhood Plan. However, we consider that a number of changes to the plan are needed to ensure that it meets the basic conditions.
- 7.2 Wainhomes is promoting the land west of Farriers Green, Valley Truckle as a sustainable urban extension to the town, which could make a valuable contribution to the supply of housing and employment land. Part of the site is included within the Business Area of Search in the Draft CNP. Part of the site is included within the Business Region of Search in the Draft CNP. The identification of this site within the Business Region of Search is supported. The site is capable of accommodating B1 employment space and/or other B uses. This could include premises for high technology industries; for example to accommodate emerging businesses related to the Spaceport proposals at Newquay airport.
- 7.3 Notwithstanding our support for the identification of part of the site within the Business Area of Search, we consider that greater flexibility is needed within Policy 2A to allow housing development to come forward as part of a mixed use development, which can enable the delivery of employment land to meet the development requirements set by the Cornwall Local Plan.
- 7.4 We would very much welcome further discussions with the Town Council to discuss the emerging CNP, and in particular the potential development of the land west of Farriers Green as part of the Business Area of Search. Wainhomes is currently preparing a masterplan for a mixed use development across the site, and therefore this would appear to be an ideal time to meet to discuss the proposals for the site.

## 8. Appendices

- EP1. Site location plan - land west of Farriers Green, Valley Truckle





**Camelford**  
**LAND AT VALLEY TRUCKLE**  
**CAMELFORD**  
**Location Plan**

Date: Nov 2016 A2 Scale: 1:1250 Drawn: eil



**WAINHOMES**  
Wainhomes (South West) Holdings Ltd  
Owlsfoot Business Centre Sticklepath  
Okehampton Devon EX20 2PA  
Tel: 01837 84100 Fax: 01837 841019