

Wadebridge Area Neighbourhood Plan Steering Committee

Response To Wadebridge Town Council Questions

22nd November 2017

PREAMBLE:

For anyone not familiar with the neighbourhood planning process, it is important first to understand the legal basis on which all such plans have to be prepared. In essence this is:

1. All policies have to be based on objective evidence that has taken all relevant considerations into account, and that has been recorded;
2. It must also be demonstrated through consultations and surveys that these policies enjoy the broad support of the community at large, and work towards the objectives set out in the plan;
3. Everything in the plan needs to be compliant with all national planning law and guidance as well as the Cornwall Local Plan (adopted in November 2016);
4. For a plan to secure approval by an inspector at a later stage a clear audit trail has to be kept of the evidence gathered and the reasons for a particular policy in preference to possible alternatives;
5. A neighbourhood plan may point to the need for additional infrastructure but cannot make provision for it. It must also provide for at least the minimum number of new dwellings as prescribed in the Cornwall Local Plan.

It is then essential to read the latest (September) version of the WANP in its entirety to understand the various stages that it has been through, the options considered in fulfilling the vision for the future of our area and, equally vital, the texts justifying each of the draft policies: this also helps to explain the reasons behind them.

It is important to remember that if the remaining stages of the process cannot be completed in time for the plan to be submitted within almost exactly one year from now, Cornwall Council have the right to take over the allocation of sites suitable for development. In that event the result would probably be that more, rather than less, new houses would be built in our area in the coming years than would have been the case under the latest version of the WANP.

You should also be aware that virtually all the huge amount of material that has been gathered and considered is stored at the offices of WTC and is available for your inspection.

The Steering Committee trust that all the material that is available, including of course the latest version of the WANP, and that the responses below to your specific queries will help

you to appreciate the robustness of our plan. Our objective is to ensure that the community has the greatest possible influence on the development of the Wadebridge area so that it remains the very special place that we know it to be.

1. Can you please provide the evidence for review which confirms the approach taken as to 'infill' for the NHP?

At the start we investigated the NCDC development boundary ("Built Up Area Boundary" or BUAB) established in 1991. The BUAB was the basis of all development activity and 'infilling' this designated area has, in accordance with CC's development policies regarding sustainable development, been in close proximity to the existing built structure.

The boundary has delivered a significant number of additional homes through the past 26 years. Through the past 8 years of the planning period from 2010 to 2017 circa 553 houses have been built or received planning approval.

The current boundary has only been modified by areas outside the NCDC boundary which have received planning approval (e.g. on West Hill Linden Homes, Dunveth retirement homes).

The first Draft Plan (Jan 2017) recommended further development outside this boundary but within the by-pass at Gonvena, Trevarner (Above Town) and Dunveth. These additional sites, combined with as yet undeveloped sites within the boundary, have the potential to at least deliver circa 547 houses (2017 -2030) to achieve the overall 1,100 target for the period 2010-2030.

The evidence references are:

- **Draft Plan (Jan) pages 20-29 – Sustainable Development narrative & Policies**
- **Objective (Technical) Review of Land supply for housing & Employment – Exec summary and full report (November 2016)**
- **Objective (Technical Review) of Built –up Boundary –BUAB (Nov 2016)**
- **Wadebridge Growth & Development Options – Paper for Steering Group consideration and decision (Nov 2016)**

2. Supporting evidence for site allocations – can this be presented for review and understanding?

Yes. Following the public consultation on the Draft Plan (Jan 17), the evidence gathered from the public and WTC was considered by the Steering Committee.

For comments on the public consultation see Q16. Following the consultation, WTC colleagues informed the SC that their Council wanted Gonvena Land removed as a development option (to be justified as local green space or otherwise). While accepting the 1,100 overall 2010-2030 target, WTC wanted the SC to devise a way to effectively control development by some form of site allocation so that the maximum growth potential was close to the minimum 1,100 target.

Our Consultants Stuart Todd and Paul Weston were tasked to produce an appraisal of the situation for the SC's consideration and decision.

The evidence references are:

- Paper 1 (ST) Wadebridge growth areas site review- Discussion Paper 10.08.17.pdf (essentially Land Supply Appraisal evidence data plus updated summary of planning applications and overview comments)
- Paper 2 (PW) WANP growth strategy Confidential Discussion Paper SG 17Aug17.pdf (Discussion paper to assist SC with next step decisions on policies for the pre-submission version)

The SC meeting was held on 17th August and decisions were taken to support WTC's resolutions not to include Gonvena with a loss of circa 300 potential houses.

The SC believe that there might also be the possibility of a loss of a potential further 200 houses related to problems in connection with development at Bodieve Park (access and traffic congestion at the junction of B3314 and Gonvena Hill) and Trevilling (dependent on moving Dafton's factory to another location).

Following consideration of the above papers, decisions were taken regarding the preferable sites outside the boundary (Bodieve North of Ball, Trevarner Above Town, Higher Trenant & Dunveth) for strategic and sustainability reasons. Policy amendments were agreed (See Minutes SC 17.08.17 on WTC website).

3. Public consultation – Regulation 14 doesn't offer the public any opportunity for comment. The consultation in February 2017 seemed to discount public opinion. Would a formal public consultation be a better option rather than moving on to Regulation 14?

Not true: under Regulation 14 there is full provision to allow for Community consultation. See <http://www.legislation.gov.uk/uksi/2012/637/regulation/14/made>. And there were several changes to the plan following the February 2017 consultation – see the answer to Question 16 below.

The pre–submission version once accepted by the three councils will allow the process to proceed to the next consultation phase.

The next phase of the Project Plan (Mid Nov–end December), having published the Pre-Submission version, will include consultation with ‘Statutory & Strategic Consultees’ and ‘Community & other Stakeholders’. Following these activities, all comments received will be reviewed and any necessary amendments considered.

Reference: See Project Plan Version 5c Oct 2017 issued 2nd February to all councillors

When our three councils have approved the Final Submission Version, and the formal Consultation statement, Basic Conditions statement and SEA appraisal report are completed, all the appropriate documents will then be released to the Local Planning Authority.

4. Where is the evidence for development beyond the bypass now being part of the plan? This was not determined from the result of public consultation – who decided to implement the revised boundary and why?

This is partly covered in the response to question 2. The first Draft Plan (January 2017, pages 27 -28) Policy SD04 clearly identified a preferred direction of growth North of the Ball roundabout. The narrative detailed in sections 9.27 & 9.28 on page 27 explains the circumstances when this land may be required.

The land North of Ball and adjacent to Bodieve village had been identified as a potential area for mixed development in Cornwall Council’s Town Framework Study for Wadebridge (See Objective [Technical] review of Land Supply for Housing & Employment – Nov 2016, pages 9-13).

The removal of Gonvena land for development is the most significant reason for the SC’s decision to allocate the land North of Ball. Relatively few negative comments were received from the public to this proposal in the Feb 2017 consultation and even less to a Pre-Planning Application progressed by the developer to the Strategic Planning Committee in March 2017.

The SC believe that there are significant strategic benefits to our community if this land is developed over time and subject to a Master Plan arrangement. The site is close to the town structure, close to the junction of the A39/A389 at Ball and has the potential benefit to develop a ‘Rock Relief Road’ to relieve the congestion around the Gonvena hill connection to the B3314 and Wadebridge School access. This is an opportunity to resolve many problems identified in recent traffic surveys, including constraints to the proposed Trevarner development.

As mentioned in the response to Q2, the decision to amend policy SD04 – Mixed use site allocation and narrative notes 9.26 – 9.31 Pages 27-28 of the Pre-Submission Plan (Sept 2017) was taken at the SC meetings 17th August 2017 and further confirmed at the meeting of 6th September 2017 (on WTC Website).

5. What was the justification to contain building within the bypass?

The initial objective was to investigate all available sites identified with potential for housing development as identified in CC's Town Framework review (2012). In line with the general principles for planning town growth, initial consideration was focused on extending the existing built structure, connectivity to the existing road system and closeness to the town services, e.g. Town Centre shops, schools, recreational areas etc.

The Town Framework Review and Land Supply Appraisal identified several sites outside the BUAB but inside the by-pass that potentially could meet the criteria for sustainable development.

Reference: Draft plan (January 2017) Sustainable development narrative and policies, maps Pages 20-29

6. When was the Boundary itself looked at as being fit for purpose? It seems that there is no capacity to provide the level of housing required if development is contained within the boundary as it is currently shown.

We agree with regards to capacity. That is why there are additional policies SD03 and SD04, and limited countryside provision in SD02, alongside SD01. These policies must be considered as a whole.

When preparing the first draft of the Plan (Jan 2017) the SC recognised that, following significant development in past years, the remaining available sites within the existing boundary could not deliver the required level of housing. For that reason, four sites outside the BUAB but inside the bypass were recommended for development – Gonvena, Higher Trenant (Sainsburys), Trevarner (Above Town) and Dunveth Care home. These sites, plus the potential of Bodieve Park (football ground) and Trevilling – which are inside the existing BAUB – would ensure that the target of 1,100 houses could be achieved by 2030.

The simple logic was that infill within the by-pass and close to the existing built structure would be the most sustainable solution for the medium term. Clearly WTC's decision to exclude Gonvena as a potential development site and the limitations for other developments caused by the congestion at the junction of

the B3314 at Gonvena Hill has resulted in further consideration and the amendments detailed in the Pre –Submission Draft Plan (Sept 2017) version.

7. Site 10 and site 32 – why has one been included for development and the other has not?

The SC did not regard these sites as an either/or choice.

Site 10 (known as Church Park) is essentially a large area offered for housing development (circa 500 houses) in the 2016 Strategic Land Assessment Appraisal 2016 (SHLAA). The issues related to this site are outlined below.

Site 32 is a relatively large area East of the Ball roundabout and north of the A39. The SC have identified this area as having the potential for the longer term development as an edge-of-town business park and suitable for mixed development with easy access to the major road network. The SC believe that this area will replace in town employment areas (e.g. Daftons who want to expand and move away from Trevilling, and ‘High Tech’ business units such as those envisaged by WREN).

NOT QUESTIONED BUT EXPLANATION OF WHY SEVERAL SITES ARE NOT IN THE PLAN

At the presentation on 2nd February 2017 the SC members confirmed that the NDP proposals MUST comply with National & Cornwall Local Plan policies. This important assessment is outlined and ‘conditions’ required to be followed by the NPD appraisal team are detailed in Section 4: The Strategic Context Pages 11-14 of the Pre Submission Plan (Sept 2017).

The initial analysis of the SHLAA confirmed that overall landowners were offering land with the potential capacity to deliver 2,900+ houses (i.e. 2.6 times greater than requirement 2010-2030).

Site 10 (Church Park) East of the A389 by-pass at the edge of the Allen Valley was eliminated as being a sensitive countryside location outside the development boundary and not considered to be sustainably connected to the amenities of the town. This site did not meet the NPPF and Cornwall Plan criteria. The subsequent Pre Planning application PA16/10641 was refused in March 2017 on these specific grounds as well as others. (See Refusal Notices on the Planning Portal http://planning.cornwall.gov.uk/online-applications/files/6C05BB17D8EEFA3F21F0BA75EBAEEE3B/PA16_10641-Decision_Notice-3258433.rtf)

Sites 26, 28 & 29 (Trevarner Farm) equally have been excluded from the plan on the same criteria. No planning application has been raised for these areas.

Site 17 (Land at Dunveth and Car parking for Royal Cornwall Show) excluded for housing development other than small portion allocated for development of Care home and individual care units.

Sites 22 & 23 (Land south of the Culvery and Mowhay Meadow) excluded given the access issues to and through the town via Trevanion Road and Platt gain access to the by-pass road system. The Redrow planning application has been refused.

In arithmetic terms these eliminations have removed approximately 1,800 houses from the SHLAA. With only 547 houses remaining to be allocated, the adjusted SHLAA provides for double this number and an on going five year land supply.

8. Has the capacity of the sewage system in Wadebridge as being confirmed as fit for purpose – i.e. – can it support the proposed level of development?

During the evidence gathering stage it was confirmed that the Wadebridge Sewage Plant can cope with the proposed level of development to 2030. Naturally developers will be responsible for sewage infrastructure and pumping facilities and pipework to connect their area to the main drainage system.

9. Can we control the developments with regard to timing in the NHP?

We believe as a result of site allocation and Master Planning arrangements that both the volume of house building and timing can be considered and managed in conjunction with Cornwall Council Planners. At present our plan is focused on what, why and where.

The ‘when’ factor at present is broadly 2017-2030 at consistent annual levels. Much will depend on developers coming forward with acceptable applications. Market conditions will also affect the rate of growth.

10. Reference is made to 2 years and then allocations will be determined by Cornwall Council. Can you please explain this (S4.8)?

Yes. Section 4.8 on page 12 of the Pre-Submission Plan (Sept 2017) confirms that if our plan does NOT meet CC’s criteria for submission by November 2018 (i.e. two years after the adoption of the Cornwall Local Plan). they have the right to take over and determine the allocations for development.

Having agreed to produce a plan, our job is to see it through and submit it in the appropriate format. The clock is ticking, and our NHP must be in submission in less than a year.

11. The NHP is trying to protect the Town Centre. The town now has empty shops and charity shops but the NHP does not want businesses to be returned to residential use. What about empty shops which remain empty for some time and become derelict – is there provision for this in the plan?

Yes – See Town Centre Development narrative 12.7 – 12.10 and policy TR01 Town Centre Development followed by Map M on Pages 45 & 46 of the Pre-Submission Plan version (September 2017).

12. What land does Cornwall Council own in Wadebridge?

Land at Trevilling, Land at Trenant, green areas, car parks and possibly more.

13. The Duchy – has the title of land been resolved at Bradford's Quay?

The Duchy owns the riverbed between low and high water along the Camel and must be consulted regarding any proposed development that may affect these areas under their control. The same applies to the Padstow Harbour Commissioners.

14. The Draft NHP seems out-dated as it does not include Planning Appeals. The Objective Technical Review of Land Supply also seems out of date. Do both documents require updating to reflect the progress that has occurred regarding developments?

No, they are not out of date. At the 2nd November briefing the SC confirmed that all planning applications related to the NDP are considered and the implications reviewed.

The Objective (Technical) Review of Land Supply for housing and Employment and The Objective (Technical) review of the Built up Area Boundary (BUAB) are basic evidence documents and the 'technical' review of all sites and boundaries remains relevant today.

The document "Wadebridge Growth & Development Policy Options" issued in November 2016 related to the First Plan Draft (January 2017) has been updated. See the reference to Papers (1) & (2) in the response mentioned in the response to Question 2.

15. Does the Steering Group believe that the Plan today is what the Town wants?

Yes we do. Our plan has to be compatible with National Planning policy and the Cornwall local Plan. We believe that the 48 policies included in the plan offer our

community both protection and positive opportunity to build a better and sustainable future.

The process of developing our plan has been community lead based on consultation and objective evidence gathering for over five years. The milestones have been the Introduction Consultation, Public Survey, Evidence Consultation, Vision Consultation, Land Supply consultation and First Draft Plan Consultation.

Before adoption the whole community will have a final opportunity to comment and the ultimate say will be determined by referendum.

16. The February Consultation – what changed in the plan as a result of this consultation?

Most of the policies and much of the plan was supported and received a very positive response. This resulted in 21 policies remaining unchanged; 16 policies having only minor changes; 5 policies being subject to major changes; and 3 policies being replaced. (The evidence is available in reports produced by our supporting consultant, Paul Weston.)

17. Comments made in the February consultation referred to the Church Park development. These comments therefore related to Site 10 but were discounted as they were seen to be referring to a planning application. Comments made were however made in relation to a Site. What were the grounds for no change to the Draft Plan as a result of these comments made by the public?

No, they were not discounted but reviewed objectively. We received 25 comments favouring extension outside the BUAB and 20 of these were in favour of the Church Park development. Against this we received 19 comments wanting to keep developments inside the boundary. In overall terms the SC concluded there was a relatively balanced view and statistically not significant.

All respondents were required to provide names and addresses and it was noted that nine respondents were involved with Church Park through land ownership, family relationship or beneficial interest connected with those promoting the development.

It was a fact that at the time of the consultation the pre-planning application PA16/10641 for the development at Church Park was being considered by the CC Strategic Planning Committee. The application was refused. (See the Planning Officers Addendum notes including the reasons for recommending refusal dated 3rd March 2017, and the Notice of Refusal of outline planning Permission issued following the Committee meeting and referenced above).

It is a matter of fact that the community response to the Church Park application was 55 comments with 47 objecting, 4 supporting & 4 neutral (see the Planning Portal re PA16/10641).

As part of the general public consultation, the then Chair of the NDP Steering Committee Cllr Starling issued a report confirming the reasons why the proposed Church Park development was not supported and not included in the draft plan (see response to Question 7). This document was included on the planning portal.

18. Can we review the February consultation results?

Yes copies of summaries prepared by our consultant (Paul Weston) were shared with the Town Clerk and further summary analysis can be provided if required.

19. Employment land review – what reviews have been carried out since 2010?

The information we have gathered is detailed in the Objective (Technical) review of Land Supply for Housing & Employment (November 2016).

In addition to the ELR (2010) data we reviewed the emerging Cornwall Local Plan and the Strategic plan for employment across Cornwall. This plan indicated that in addition to the 1,100 dwellings target our area would require at least 8,000 sqm of employment space.

In the broader Wadebridge & Padstow Community Network area. with completions during 2010-2014 of 2,229.9msq and commitments totalling 9,012msq, the area as a whole is already over provided with regards to the Local Plan requirement.

Even though there is over-provision of employment land currently at four sites of approximately 11-12 hectares and no significant planning application in the pipeline other than supermarkets (particularly at West Hill), the SC believes that land at Bodieve Park, Higher Trenant and Trevilling would be better utilised for alternative housing and mixed development in the medium term.

To compensate for the loss of employment opportunity at the above locations and to facilitate longer term opportunities for further employment growth, we believe that an area of about 10 hectares should be provided at an edge-of-town location on a contingency basis (See response to question 7 re site 32).

References: Objective (Technical) Land Supply Report for Housing. Report Executive Summary Pages 2-3 , Main report pages 14-15 ,17,26 & 40

20. Designated green open spaces – when were these areas last reviewed and confirmed?

See the completed report issued by P Weston – “Wadebridge Area Neighbourhood – Local Green Space Report. File ‘WANP Local Green Space

Assessment Report sep17.pdf. WTC Clerk has his report delivered by email 4th October 2017

21. Should the 3 Councils be concerned in relation to the FOI recently received?

We believe that the evidence taken as a whole provides a history of the plan and the democratic process of preparing it. All of the individuals involved with the plan consider that everything is above board and transparent.

22. Does the Steering Group believe that the Draft NHP will pass the inspection stage?

Subject to continuing support, commitment and encouragement of all three Councils involved and the preparation of required documentation, we are confident that inspection will not be a major problem.

There has been thorough consultation and cooperation with Cornwall Council on scoping and all other relevant matters associated with the process.

23. Policy SD04 – is this Policy deliverable considering public comments made by Paul Stein (Cornwall Council) regarding a Pre-app for a development, which was previously submitted for this site?

No comment at this stage things as have moved on. We await further information from the developer. (Presentation planned for 14th December.)

24. Why is the plan moving forward before the SEA is completed?

This activity is planned to work in parallel and needs to be finally based on the Pre-Submission version of the NDP. Explained at 2nd Nov briefing – Please refer to the Project Plan (Version 5c-Oct 2017).

In that same period we will receive the results of the SEA appraisal. The results of this 'audit', covering many issues from air quality and environmental matters to population and transportation issues, may if necessary result in further amendments/clarification of the plan.

**Ref: Egloshayle, St Breock and Wadebridge Neighbourhood Plan Steering Committee
22.11.2017**