

**PROPOSED DEVELOPMENT OF UP TO 325
DWELLINGS, COMMUNITY GROWING AREAS,
PARKLAND AND SUPPORTING INFRASTRUCTURE**

LAND SOUTH OF WEST HILL, WADEBRIDGE

PRE-APPLICATION SUBMISSION REPORT

February 2023

grassroots PLANNING

Bristol North Baths
Gloucester Road
Bristol
BS7 8BN

t: 0117 930 0413 grassroots-planning.co.uk

REPORT CONTROL

Project:	Wadebridge
Report Type:	Pre-app Submission
Client:	LVA
Our Reference:	800/A3
Date:	January 2024
Version:	V.1

COPYRIGHT

This document must not be copied or reproduced in whole or in part without the written consent of
Grass Roots Planning Ltd

1.0 INTRODUCTION

- 1.1 On behalf of Wadebridge LVA LLP (LVA), Grass Roots Planning has been instructed to prepare and submit a request for pre-application advice, for the erection of up to 325 dwellings (including 30% affordable) and other ancillary supporting infrastructure including extensive public open space.
- 1.2 The site lies to the west of Wadebridge, a settlement situated within the northern part of Cornwall Council's (CC) administrative area. Other established towns such as Padstow and Bodmin are located within a short drive from the site.
- 1.3 A recent appeal decision (ref. APP/D0840/W/21/3285995) confirmed that as a result of the failure of any neighbourhood plan to progress in the Town, along with no allocations for Wadebridge being made in a Site Allocation Development Plan Document, the unmet housing requirement for the Town has resulted in policies that control the location of new development being considered out of date - specifically, Policies 3 and 7 of the Cornwall Local Plan. The unmet need is identified in Cornwall Council's Housing Implementation Strategy 2023 as being 198 dwellings for Wadebridge specifically.
- 1.4 LVA have an agreement with the landowners to promote this site for residential development. It is considered that the proposals will form a sustainable extension to the existing settlement, contributing to the unmet need for both market and affordable housing. This will remedy the currently unmet need referenced above.
- 1.5 We enclose the following information to assist with your consideration of this enquiry:
- Site Location Plan
 - Constraints and Opportunities Plan
 - Concept Masterplan
 - Pre-Application Technical Note – Flood Risk and Drainage
 - Pre-Application Technical Note – Highways and Accompanying Access Plan
 - Archaeological Desk-based Assessment

2.0 THE SITE

2.1 The site is approximately 17.29 ha in size. The site is formed of six agricultural fields which are bound and intersected by hedgerows. The site is located to the south of West Hill which is a continuation of residential development from the town centre to the east. To the west of the site is Dunveth Business Park, an existing retail / industrial park where new units have recently been built adjacent to the site boundary.

2.2 The parcel of land proposed for development is depicted in Figure 1 below:



Figure 1. Site Location (see submitted plans for exact boundary)

2.3 Two public rights of way cross the site. The first crosses the site on a north-south axis connecting West Hill and St Breock, with the second crossing east-west, entering the site from Whiterock Road and existing around the adjacent industrial units on the site's northwestern boundary. These routes are shown in red in Figure 2 below;

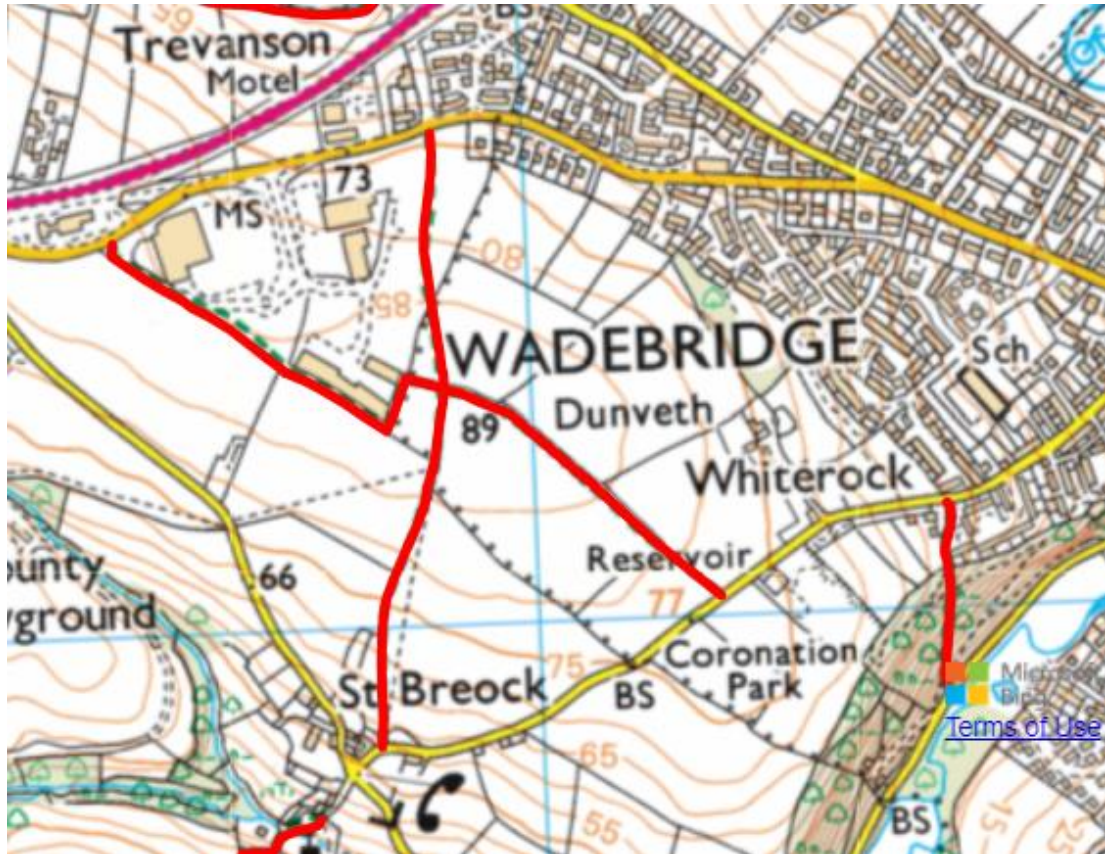


Figure 2. Public Rights of Way crossing the site.

- 2.4 The site does not fall within or adjacent to a conservation area however there are clusters of listed buildings located to the east and south on Whiterock Road and within St Breock. To the west, further along West Hill, a listed milestone sits adjacent to the existing retail store located here.
- 2.5 The site lies solely within Flood Zone 1, although a very small portion of the site is subject to surface water flooding as the plan in the separate supporting drainage note identifies. The site does not lie within an Area of Outstanding Natural Beauty, Site of Special Scientific Interest or any other specific ecological or landscape designation.
- 2.6 Wadebridge contains a wide range of key everyday facilities including primary (St Breock and Wadebridge Primary Academy) and secondary (Wadebridge School) schools, multiple food stores (Aldi, Tesco, Lidl Co-op) pubs, restaurants, post office, cinema, doctor's surgery, church (St Michael's Catholic Church), community centre (Concern Wadebridge) and the Wadebridge Sports and Leisure Centre.

2.7 A bus stop is located to the east of the site, approximately 120m from the pedestrian entrance onto West Hill. This provides access to services nos. 11, 90, 92 and 185 which connect to Padstow, Newquay, Truro, Bodmin and Plymouth. Bus services are frequent, running approximately every 30 minutes.

3.0 THE PROPOSED DEVELOPMENT

3.1 An emerging illustrative masterplan for the site (see extract below) is submitted as part of this pre-application enquiry. We will set out how this positively responds to the site’s constraints and opportunities (see submitted plan reference. 230604 - L 02 02 A) and we are specifically seeking the council’s comments on this layout, the quantum of development that it provides, and the form of development proposed.



Figure 3. Extract of Illustrative Master Plan

3.2 The proposed development as set out in the illustrative master plan is for the erection of up to 325 dwellings, 30% (up to 98) of which will be affordable and will include a mix and range of house types such as detached, semi-detached and terraced properties, ranging from 1-4 bedrooms in size and including three to one storey properties. Generous areas of open space are positioned to the south and west of the site with additional landscaping to the north and

northeast. The proposed density of development ranges for the different character areas and provides an average of 33 dwelling homes per hectare across the site.

- 3.3 The development has been designed to accommodate existing site features such as hedgerows and trees, to protect biodiversity interests, on site and is thus formed of 5 distinct development parcels separated by the existing hedgerow and site characteristics.
- 3.4 The entrance to the site is proposed to the north from West Hill where lower-density development fronting West Hill is proposed. To the west of the entrance is an area of archaeological potential (as discussed later) that is to be left undisturbed. The main access road meanders into the main core of the site where higher-density housing is proposed within the centre of the site. In the northern and eastern extremities of the site attenuation, ecological enhancement and areas of open space are proposed. To the west and south of the site, adjacent to the core parkland area, less dense housing is proposed with barn form and reduced height development provided to create a rural transition zone. There is also some potential for self-build plots in these areas.
- 3.5 Public open space and ecological enhancement areas aim to create a feature green parkland to the southern parts of the site with lower-density development immediately adjoining it. Attenuation basins are accommodated within the site as shown on the illustrative master plan to deal with surface water within the site. These will be designed to promote their biodiversity value.
- 3.6 The site has been designed sensitively to link to the adjacent Business Park (to the west) and approved care/extra care site that lies on the northern edge of the site – as the master plan shows.
- 3.7 The impact of the proposed development on existing residential properties that border the site's boundaries has also been carefully considered. Accordingly, the development has been provided with generous buffer zones where new development is proposed in proximity of existing properties, to avoid any adverse overlooking and overshadowing issues. This is achieved through the provision of a landscape buffer along the site's boundaries which both assists in creating biodiversity corridors through the site alongside minimum separation distances that far exceed the standard 21m guidance.

3.8 The existing trees and the majority of hedgerows found on the site currently are to be retained to protect biodiversity value as well as to provide a visual buffer for the development. Additional planting will be introduced within the development parcels and all streets have been designed with generous margins to allow them to be tree-lined in accordance with paragraph 131 of the NPPF.

4.0 PLANNING POLICY

- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the development plan, unless other material considerations indicate otherwise.
- 4.2 The site falls within the Cornwall administrative boundary. Therefore, in this case, the relevant parts of the development plan include:
- The Cornwall Local Plan ‘Strategic Policies’, adopted in 2016;
 - Cornwall Site Allocations DPD, adopted in 2019; and
 - A small number of saved policies from the North Cornwall Local Plan (1999).
- 4.3 The ‘other material considerations’ referred to in Section 38(6) of the Act would include the National Planning Policy Framework (NPPF), National Planning Practice Guidance (NPPG), Planning Policy Statements (PPS), Planning Circulars, Policy Advisory Notes (PAN), relevant Supplementary Planning Guidance (SPG) or Supplementary Planning Documents (SPD) (emerging and adopted).

Cornwall Local Plan: Strategic Policies

- 4.4 The Local Plan covers the period 2016 – 2030 and was adopted in November 2016. The Council reviewed the plan in accordance with Regulation 10a of the Town and Country Planning (Local Planning) (England) Regulations 2017. The review, accepted by Cabinet on 22nd September 2021, concluded that the Plan remains up to date and continues to carry full weight in decision-making.
- 4.5 The policies most relevant to the assessment of the pre-application proposals include the following in our view:
- **Policy 1 – Presumption in favour of sustainable development.** This policy replicates the presumption in favour of sustainable development set out in the NPPF.
 - **Policy 2 – Spatial Strategy.** New development should provide a sustainable approach to accommodating growth, providing a well-balanced mix of economic, social and environmental benefits.
 - **Policy 2a – Key Targets.** The plan will seek to deliver a minimum of 52,500 homes at an average rate of about 2,625 per year to 2030.
 - **Policy 3 – Role and Function of Places.** The scale and mix of uses of development should be based on the role and function of places; other than at the main towns identified in this policy, housing and employment growth will be delivered in the

CNA through the 'rounding off of settlements and development of previously developed land within or immediately adjoining that settlement of a scale and size appropriate to its role.

- **Policy 6 – Housing Mix.** New housing developments of 10 or more dwellings should include an appropriate mix of house size, type, price and tenure to address identified needs and market demand and to support mixed communities
- **Policy 8 – Affordable Housing.** Sets out that on site of more than 10 units affordable housing should be provided at a percentage relevant to the zone in which the site is located. In this instance, Wadebridge is in Zone 4, required to provide 30% affordable housing.
- **Policy 12 – Design.** Sets out that development must ensure Cornwall's enduring distinctiveness and maintain and enhance its distinctive natural and historic character.
- **Policy 13 – Development Standards.** Sets out standards for internal space, public open space, vehicle and parking standards, waste storage, natural light and ventilation.
- **Policy 23 – Natural Environment.** Development proposals will need to sustain local distinctiveness and character and protect and where possible enhance Cornwall's natural environment and assets according to their international, national and local significance.
- **Policy 24 – Historic Environment.** Development proposals will be permitted where they would sustain the cultural distinctiveness and significance of Cornwall's historic rural, urban and coastal environment by protecting, conserving and where appropriate enhancing the significance of designated and non-designated assets and their settings.
- **Policy 25 – Green Infrastructure.** The existing green infrastructure network in Cornwall, which is important to recreation, leisure, community use, townscape and landscape quality and visual amenity will be protected and enhanced. Development proposals should contribute to an enhanced connected and functional network of habitats, open spaces and waterscapes.
- **Policy 26 – Flood Risk Management and Coastal Change.** Sets out that development should be consistent with any adopted strategic and local flood and coastal management strategies, be sited that minimised, reduces or eliminates flood risk on the site and provide long-term water management plans.
- **Policy 27 – Transport and Accessibility.** Development should provide safe and suitable access to the site for all people and not cause a significant adverse impact on the local or strategic network that cannot be managed or mitigated.
- **Policy 28 – Infrastructure.** Developer contributions will be sought to ensure that the necessary physical, social, economic and green infrastructure is in place to deliver development.

Site Allocations DPD

- 4.6 The Site Allocations DPD has little relevance to applications in the Wadebridge CNA because this document makes it clear that the community had asked that they deal with specific allocations via a Neighbourhood Plan.

Wadebridge Neighbourhood Plan (NP)

- 4.7 Work on the Wadebridge NP continued until 2019, at which point it seemed to stall and there has been no meaningful update from the Town Council on progress since that point.
- 4.8 Further evidence was presented at appeal, under application reference APP/D0840/W/21/3285995, clarifying that the NP would not progress any further. This was due to disagreements between the NP members prior to 2020 and a breakdown in their working relationship. As such there is no NP for the area, no allocations, and no settlement boundaries.

National Planning Policy Framework (NPPF)

- 4.9 The NPPF sets out the Government's planning policies for England. Central to this guidance is the presumption in favour of sustainable development, which comprises social, economic and environmental roles.
- 4.10 Key paragraphs relevant to the application's assessment are as follows:
- **Paragraph 11** states that decisions should apply a presumption in favour of sustainable development. For decision-taking, this means 'approving development proposals that accord with an up-to-date development plan without delay', or 'where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
 - i. The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - ii. Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework as a whole.'
 - **Footnote 7** states that the areas or assets of particular importance including SSSIs, Green Belt, Local Green Space, AONB, a National Park, Heritage Coast, irreplaceable habitats, designated heritage assets, or areas at risk of flooding or coastal change.

- **Footnote 8** states that a plan may be considered out-of-date if the authority is unable to demonstrate a five-year housing land supply, or where the Housing Delivery Test indicates that the delivery of housing is substantially below the housing requirement.
- **Paragraph 14** states that for applications involving housing where the presumption (para 11d) applies the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided all of the following apply:
 - a) the neighbourhood plan became part of the development plan two years or less before the date on which the decision is made;
 - b) the neighbourhood plan contains policies and allocations to meet its identified housing requirement;
 - c) the local planning authority has at least a three-year supply of deliverable housing sites (against its five year housing supply requirement, including the appropriate buffer as set out in paragraph 74); and
 - d) the local planning authority's housing delivery was at least 45% of that required¹⁰ over the previous three years.
- **Paragraph 33** requires policies in local plans and spatial development strategies to be reviewed to assess whether they need updating at least once every five years, and should then to be updated as necessary
- **Paragraph 40** states that local planning authorities have a key role to play in encouraging other parties to take maximum advantage of the pre-application stage
- **Paragraph 41** outlines that the more issues that can be resolved at pre-application stage, including the need to deliver improvements in infrastructure and affordable housing, the greater the benefits.
- **Paragraph 60** notes that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed.
- **Paragraph 77** highlights that LPAs should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement, including the addition of an appropriate buffer.
- **Paragraph 109** states that the planning system should actively manage patterns of growth and significant development should be focused on locations that are, or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.
- **Paragraph 123** requires planning policies and decisions to promote an effective use of land in meeting the need for homes and other uses.
- **Paragraph 124** confirms that planning decisions should support development that makes efficient use of land.

- **Paragraph 129** states that where there is an existing, or anticipated, shortage of land for meeting identified needs, “... it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site”.
- **Paragraph 135** requires that planning policies and decisions ensure that developments are, inter alia, sympathetic to local character, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities).

5.0 PLANNING STATUS AND SITE HISTORY

- 5.1 In terms of the current development plan, the site lies to the southwest of Wadebridge as shown in the extract of the Plan's policy maps shown in Figure 4. There are no settlement boundaries drawn in the Cornwall Local Plan as these were to be defined via individual neighbourhood plans of site allocations DPD for each Community Network Area. As no detail was ever provided for Wadebridge in these documents the Town currently has no settlement boundary.
- 5.2 The site falls outside of any landscape, heritage or flood risk designation as the extract from Cornwall's adopted policy maps shown below in Figure 4 illustrates.

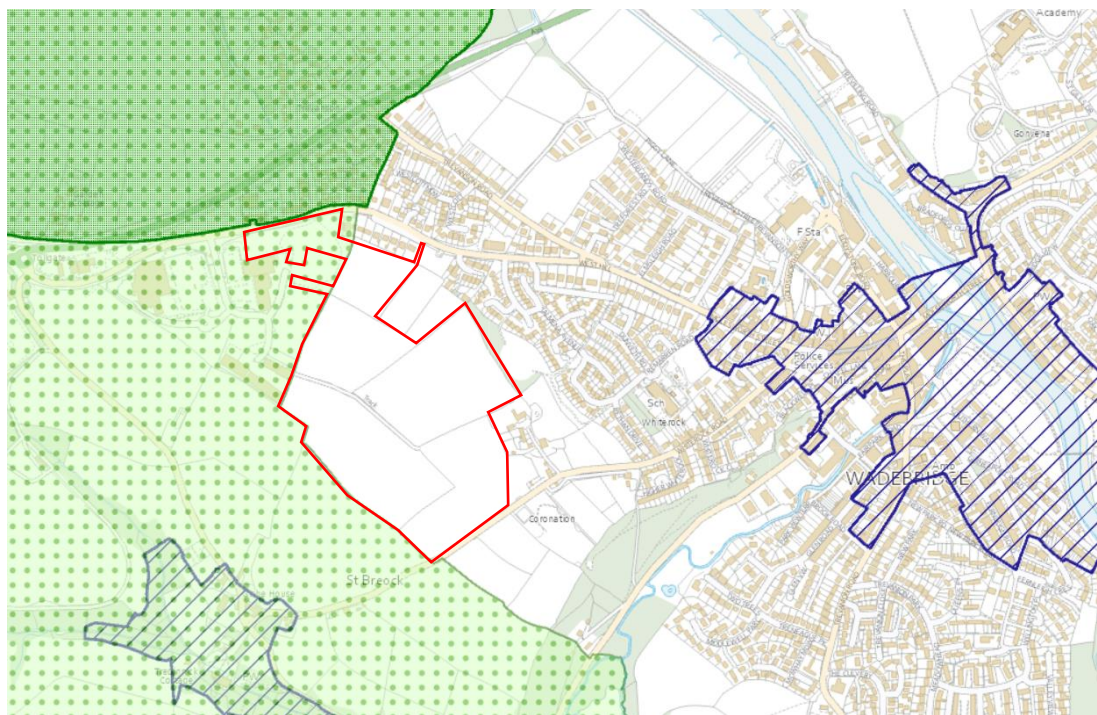


Figure 4. Extract of Planning Policy Maps from Cornwall Local Plan

- 5.3 The Wadebridge and St Broeck Conservation Areas are shown below in blue hatching and the Camel Estuary Cornwall AONB is shown in dark green to the north of the site. Additionally, the majority of the site falls outside of the designated rural area, shown in light green adjoining the site on the west and southern boundary.

Neighbourhood Plan

- 5.4 The Cornwall Local Plan sets out that specific allocations will be identified through an Allocations DPD and in specific Neighbourhood Plans. There are no allocations for Wadebridge or the CNA set out in the Allocations DPD.
- 5.5 In regard to a neighbourhood plan, while initial work to define the Neighbourhood Planning area was undertaken and initial drafting of a plan commenced in 2013 little progress has occurred to suggest this will be adopted any time soon. This lack of progress was evidenced in appeal reference APP/D0840/W/21/3285995, which stated: “*clear and convincing evidence was given to the Inquiry that the joint NP between Egloshayle, St Breock and Wadebridge will not progress any further*”. Following that decision, no further work has been undertaken to progress a Neighbourhood Plan for Wadebridge as far as we can see.

Planning History

- 5.6 The site and adjoining land have previously been subject to three planning applications of relevance.
- 5.7 To the northwest of the site an outline application for nine dwellings was submitted under reference PA18/09855 in November 2018. This application was withdrawn in December 2018 and there are no documents available to view on the Council’s website.
- 5.8 Further to the above there have been two applications for a nursing home and extra care units (C2) to the north of the application site under references PA14/01844 and PA17/01918 respectively. These sought permission for “*Outline application with all matters reserved for a new 72 bed nursing home and 75 extra care units in a care village (C2 use class). The scheme will include allotments, bowling green and other leisure facilities including a gym and bistro.*”
- 5.9 The applications were both approved in June 2014 and May 2017 respectively, however, the permissions have now lapsed.

6.0 ASSESSMENT AGAINST PLANNING POLICY

Principle of Development

- 6.1 In respect of the five-year housing land supply (5YHLS), the most recent 5YHLS statement (1st June 2023) for Cornwall identifies a supply of 6.6 years which has, along with the methodology used, been supported at appeal. Notably at Gonwin Farm Appeal where the Secretary of State in his decision to dismiss the recovered appeal (ref. APP/D0840/W/15/3002925) confirmed that there has not been a persistent record of under delivery of housing, and that therefore a 5% buffer is applicable in respect to the supply calculations. In their 5YHLS statement, the Council states they have a surplus of 630 homes against the Local Plan requirements to date.
- 6.2 Notwithstanding the above, the overall minimum target of 52,500 homes across the county is apportioned to identified parts of Cornwall. In respect of the Wadebridge Community Network Areas (CNA), the minimum target for housing is 1,100 and for the Wadebridge and Padstow residual area the target is 1,000.
- 6.3 Policy 3 sets out that the delivery of housing in specific CAN's will be managed through a Site Allocations DPD or Neighbourhood Plans and that development should be at or well-related to each settlement. The application site is considered to be well-related to Wadebridge, part of it having been proposed to be included within the settlement boundary in the failed NP. Accordingly, the proposed site should be considered to fall within the Wadebridge CNA as opposed to the Wadebridge and Padstow residual area CNA.
- 6.4 The Housing Implementation Strategy 2023 sets out the delivery for housing within the Wadebridge CNA and residual area. These are replicated below in Table 1:

WADEBRIDGE	TOTAL	REST OF CNA	TOTAL
Local Plan Target	1,100	Local Plan Target	1,000
Completions: Small sites <10	114	Completions: Small sites <10	533
Completions: Large sites 10+	370	Completions: Large sites 10+	476

Permissions: Small Sites <10	45	Permissions: Small Sites <10	210
Permissions Large Site 10+	361	Permissions Large Site 10+	195
Subject to S106: Large Sites 10+	0	Subject to S106: Large Sites 10+	0
CLI Sites without permission	0	CLI Sites without permission	0
Windfall: Small sites <10	12	Windfall: Small sites <10	56
Local Plan Site Allocations	0	Local Plan Site Allocations	0
Neighbourhood Plan Site Allocations	0	Neighbourhood Plan Site Allocations	70
Shortfall	-198	Surplus	540

Table 1. Comparison of Housing Delivery against Target set out in the Local Plan for Wadebridge and Residual CNA

6.5 As set out above the Council has identified a shortfall of 198 dwellings below the targets set out in Policy 2a of the Local Plan for the settlement of Wadebridge. The Inspector, in appeal reference APP/D0840/W/15/3002925, noted that *“the Local Plan includes the separately identified elements of the town and the residual area as individual targets as well as a cumulative total area target”* therefore *“allowing shortfalls to be made up between parts of the CNA would, to my mind, invalidate the purpose of the individual targets and potentially frustrate the purpose of Policy 3”*.

6.6 There is therefore an identified shortfall of housing for the Wadebridge CNA, regardless of the ability of the Council to demonstrate a 5YHLS across the wider Council area. Policy 3 states that the delivery of housing within Wadebridge is to be set out in a Site Allocations Plan or through a Neighbourhood Plan. As previously mentioned, the SAP has no allocations for Wadebridge and the Neighbourhood Plan has failed to progress. It was for these reasons that the Inspector found Policy 3 out-of-date because there are no allocations or neighbourhood plan as required by Policy 3 to deal with the unmet housing requirement of the Town. Similarly, Policy 7, which deals with development in the countryside, was found out-of-date in the context of Wadebridge, because any development coming forward on the edge of the town to meet the deficit in housing provision that has occurred because of the failure of the NP would be in conflict with this policy.

6.7 In light of these factors, we consider that there is a clear need to deliver new housing on appropriately located unallocated land at Wadebridge.

6.8 The proposed development will deliver up to 325 dwellings towards these minimum requirements, of which 30% is proposed to be provided as affordable (up to 98). As set out above, the targets for the CNAs are the minimum requirements for housing growth and there is currently a shortfall of 198 units against this minimum plan requirement. We consider that the holistically planned development of the application site would be beneficial in addressing this identified shortfall in a highly sustainable location.

Location and Sustainability.

6.9 The site is located to the west of Wadebridge and is within walking distance of the town centre, its shops and facilities and within walking distance of the retail stores and employment areas located on the western edge of Wadebridge. The table below shows the relative distances and walking times to key facilities;

Facility	Approximate Walking Distance (m/mins)									
	0-400m	0-5 mins	400-800m	5-10 mins	800-1200m	10-15 mins	1200-1600m	15-20 mins	1600-2000m	20-25 mins
Dunveth Business Park	✓									
Aldi Supermarket			✓							
Chesterton Court Bus Stops			✓							
Pearl & Trawl Pub			✓							
Tesco Superstore			✓							
Tesco ATM			✓							
St Breock Primary School					✓					
Wadebridge Dental Care					✓					

Wadebridge Town Centre			✓		
Barclays Bank				✓	
Lloyds Bank				✓	
Wadebridge Post Office				✓	
Wadebridge Health Office				✓	
Co-operative Foodstore				✓	
Lidl Supermarket				✓	
Wadebridge Secondary School					✓
Wadebridge Primary Academy					✓
Wadebridge Sports and Leisure Centre					✓

Table 2. Distance to local facilities

- 6.10 Destinations further afield can be reached via bicycle using the Camel Trail, including Padstow (9km / 30-minute cycle) and Bodmin (10km / 35-minute cycle). The distances set out in table 2 clearly show the highly accessible nature of the site in respect of it offering realistic choices to access everyday services and facilities via walking or cycling.
- 6.11 In addition, Two bus stops are located circa 130m east of the pedestrian and cycle access which offer a regular service to major local towns, in addition to school and college-specific services, as well as a regular connection to Bodmin Parkway station. Bodmin Parkway is approximately 18km / 45 minutes cycle from the site along the Camel Trail. This clearly demonstrates that public transport is clearly available to future residents and can be promoted via travel planning in compliance with paragraph 108 of the NPPF.
- 6.12 In conclusion, the site is located within a highly sustainable location in terms of its accessibility and ability to minimise private car trips of new residents, as it offers the opportunity to walk or cycle a reasonable distance to everyday facilities, as well as via public transport.

- 6.13 Further, the site has been considered to be a sustainable location in with the previously approved care home and extra care development (ref. PA17/01918) with the case officer noting “*the location of the application site is well suited for the proposed use as it is in the built area of Wadebridge and within walking and cycling distance to the range of services and facilities in the town*”.
- 6.14 Accordingly, the site is considered to be highly accessible and the proposal to locate dwellings in this location is supported by the NPPF and policies 1 and 2 of the Cornwall Local Plan.

Highways

- 6.15 Accessibility has been previously discussed above, however, in terms of highway safety, this matter has been examined by our highway consultants AWP. Their transport assessment would accompany any forthcoming submission.
- 6.16 The primary vehicular access is proposed from West Hill via a new priority junction with a ghost island right turn lane proposed for eastbound traffic turning into the site. This junction would maintain the existing access into the Travelodge car park and Trevanson Heights on the northern side of West Hill, whilst providing a new left-turn lane for eastbound traffic into this separate site. It has been confirmed that visibility splays in line with recorded 85th percentile vehicle speeds on West Hill can be achieved at the proposed junction.
- 6.17 Additional pedestrian and cycle access points are proposed further along West Hill, onto Whiterock Road at the southern end of the site, and to Dunveth Business Park to the west. This will ensure that a highly permeable and connected development is created that encourages travel by active modes of transport. The southern access, will be a cycleway designed to also operate as an emergency access into the site to supplement the primary access.
- 6.18 The trips generated by the development would add approximately three additional vehicles per minute onto the local road network on average during the weekday peak hours. Traffic impact assessment including junction capacity testing will be undertaken at certain locations on the surrounding road network. The scope of this will be agreed with Cornwall Highways prior to submission.

6.19 Additionally, a Framework Residential Travel Plan will be provided as part of the Transport Assessment that will be submitted to support the outline application. Subject to the submission of this further information the proposed development is considered to have no negative highway impacts that would warrant the refusal of the proposals.

Flood Risk & Drainage

6.20 The site lies solely with Flood Zone 1, at the lowest risk of flooding and is not at significant risk of flooding from pluvial or other sources. However, the site lies within the EA's 'Wadebridge-Polmorla' Critical Drainage Area, requiring more stringent management of surface water discharge quantity and quality. A Flood Risk Assessment and Outline Drainage Strategy will be prepared to support a forthcoming application by our AWP our Flood and Drainage Consultants. Their technical note accompanies this pre-app request and seeks the council's drainage officer's comments on the emerging strategy.

6.21 Based on geology, flooding from groundwater is considered unlikely, however, groundwater monitoring is being progressed to confirm groundwater levels. A soakaway investigation report by Terra Firma (September 2023) concluded from initial soakaway testing that soakaways are viable for the discharge of surface water within the site.

6.22 Therefore, infiltration will be prioritised as close to the source as possible utilising various features such as on-plot soakaways, communal soakaways, permeable paving, swales, and infiltration basins. These principles have already been agreed with the LLFA.

6.23 The proposed SuDS features have been designed to be multi-functional and will enhance biodiversity and provide amenity value whilst also managing runoff quantity and quality.

6.24 The proposed development will require new gravity connections to the South West Water foul sewer network. Any areas of the site which are unable to drain via a gravity connection will be served by a proposed adoptable pump station towards the east of the site.

6.25 The site is considered viable from a flood risk and drainage perspective and can be delivered in line with the principles laid out above. Comments on the above and the proposed drainage strategy are welcomed to refine the strategy for the future outline planning application.

6.26 AWP continue to advise on the emerging layout and a full FRA and drainage strategy will accompany any planning application in due course.

Landscape

6.27 Given the site's location at Wadebridge, there is the potential for longer-range views into and out of the settlement to be influenced by the proposed development. As such an LVIA would accompany any forthcoming application and our Landscape Consultant, Savills, has provided input to guide the illustrative masterplan's development.

6.28 Initial consideration of the site by our appointed landscape architects has highlighted some key recommendations that seek to minimise landscape impacts, these include:

- Consideration of views to/from the AONB to the north;
- A green frontage to West Hill should be retained;
- Less sensitive receptors to the industrial units to the west and residents on the southern side of West Hill exist, though some planting would help to soften views from these receptors;
- PRowS should be retained and enhanced and amalgamated into new green infrastructure corridors;
- Native hedgerows and trees should be maintained and enhanced; and
- The character of Whiterock Road to the southeast should be conserved with green space along the boundary. Potential to provide pedestrian/cycle connectivity here.

6.29 The above recommendations have guided the emerging masterplan proposals, the positioning and form of the development and its extent that are presented as part of this per-application enquiry. The scheme now seeks to retain existing hedgerow boundaries and provides landscaped buffers to the properties on the southern side of West Hill as well as the industrial units to the west. A generous green buffer with allotments and green space is proposed to the southeast of the site to maintain the character of Whiterock Road. Connections for pedestrians and cyclists are also proposed here.

6.30 In summary we consider that the landscape character of the site and its surroundings has been fully embraced by the project master planners and the presented plans show how the generous perimeter planting can successfully screen and filter views of the development from key views and integrate any development sensitively into its surroundings.

- 6.31 A number of viewpoints have been proposed for assessment within the LVIA. These are shown on the drawing ref.LA013 and are submitted alongside this pre-app and we would welcome the council's confirmation that these are acceptable, or suggested alternatives.

Heritage and Archaeology

- 6.32 An Archaeological Desk Based assessment has been carried out for the site by our Heritage and Archaeological consultants TVAS South West. 54 listed buildings were identified within a kilometre of the site. However due to the separation distances involved, presence of intervening buildings along with hedgerow and trees, their significance or setting is unlikely to be impacted on by the proposals.
- 6.33 With regards to archaeology, there are a number of possible heritage assets on the site and within the immediate environs, notably, the ploughed-out barrow recorded on the northern boundary. This was noted in the HER as being already damaged due to ploughing, but in such cases, the original ditch often survives. This however does not appear on any aerial photographs nor on LiDAR. It will be necessary to provide further information about the potential of the site from field observations in order to draw up a scheme to mitigate the impact of the development on any below-ground archaeological deposits if necessary. Such a scheme can be secured via condition.

Ecology

- 6.34 GE Consulting have been instructed to advise on ecology issues and initial constraints. They have carried out ecological surveys for the site over the course of 2023 and have additional surveys to complete this year to support the planning application in due course.
- 6.35 With regards to bats, surveys have been carried out over August, September and October in 2023 and there are additional surveys to be completed in April, May, June and July this year. Four static detectors are being deployed across the site to give a balanced overview of bat activity.

- 6.36 A survey for dormice has been carried out which found no dormice or nests. A final survey is proposed for May 2024. Additional surveys are proposed in 2024 for reptiles (April and May) and breeding birds (April, May and June).
- 6.37 The development offers good opportunities for habitat creation along with allowance for significant amounts of greenspace to ensure that the Biodiversity Net Gain (BNG) requirements can be met and likely exceeded with grasslands and wetland habitats provided within these areas.

Trees

- 6.38 An Arboricultural Constraints and Opportunities Plan (ACOP) has been undertaken and is submitted alongside this pre-app request. There are a number of trees that run along the perimeter of the field boundaries to the existing fields and of good condition. These are shown on the constraints plan and their root protection zones have informed the master plan.
- 6.39 Currently it is envisaged that as many trees as possible will be retained, however if any require removal they will be replaced and overall, the development will deliver a significant number of additional trees on the site. As previously mentioned all new streets will be tree lined and additional trees will be planted to meet the requirements of 15% canopy coverage of the site in accordance with Policy G3.

7.0 CONCLUSIONS, ADVICE SOUGHT AND NEXT STEPS

- 7.1 The technical work undertaken to date has informed the presented masterplan for this site. We have identified key matters with regards to ecology, trees, landscape, heritage, highways and flood risk and drainage.
- 7.2 These assessments have concluded that 325 dwellings can be delivered on the site as part of a holistically planned comprehensive development. This will also deliver a significant amount of much needed affordable housing for the town.
- 7.3 Residential development in this location provides an opportunity to promote sustainable development given the site's highly accessible location relative to key everyday facilities, employment opportunities and public transport links. This will ensure that residents can maximise opportunities to walk or cycle from this location to their workplace or for leisure, and maximise the use of non-car travel.
- 7.4 Development in this location will also provide market and affordable homes in a location where homes there is an identified shortfall and where there is no strategic plan in place or allocations to meet the unmet requirements of at least 198 dwellings. The development will significantly contribute towards supporting the local economy by creating and sustaining jobs in construction and increasing support for local business through increased footfall. Finally, it will provide biodiversity net gain alongside multifunctional SUDs as well as a high provision of public open space.
- 7.5 As acknowledged in preceding sections, the identified shortfall of 198 homes is unlikely to be met by windfall sites alone and as such we consider that a holistically and strategically planned development is needed. There is an opportunity therefore, for this site to assist in meeting the whole of Wadebridge's minimum unmet housing need within the proposed development.
- 7.6 Therefore, the pre-application proposals will deliver a high-quality development with a wide range of benefits, including:
- Delivering housing supply to address the current deficit for Wadebridge;
 - Providing affordable housing to meet unmet need;

- Delivery of biodiversity net-gain;
- Provision of self-build plots to meet demand for this form of housing delivery and assist the council in meeting its obligations under the Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016); and
- Delivery of large swathes of public open space that will create areas for recreation for both existing and new residents far in excess of policy requirements;

7.7 Given the extensive benefits associated with the development that are highlighted above, and the fact that the Local Plan evidence base points to the settlement of Wadebridge being a suitable location for development - it represents a logical choice to boost housing delivery in the area to meet both the supply deficit. Accordingly, we consider that a future application on this site can be supported by the council.

7.8 As part of the pre-application advice, we are seeking we would appreciate it if the Council could provide specific responses to the following issues alongside any general comments and commentary that the council wish to provide:

- Whether the principle of development on this site is supported;
- Whether the provision of self-build units here is supported;
- Whether the proposed access arrangements are suitable to serve the extent of development proposed;
- Any comments about whether the emerging layout presented is considered to be appropriate;
- A view from the council's housing department in respect of the appropriate affordable housing mix;
- Agreement to the principle of the drainage strategy being put forward; and
- That the scope of the application set out below if appropriate, and if not what additional information would be required to support a future planning application for the site.

7.9 We currently envisage that the planning application will consist of the following information:

- Plans:
 - Redline Boundary Plan

- Detailed Access Works Drawing with Visibility Splays
- Illustrative Master Plan
- Planning Statement
- Affordable Housing Statement
- S106 HOTs
- CIL Forms
- Design and Access Statement
- Transport Statement and Travel Plan
- Ecology Surveys along with BNG assessment and Metric
- Landscape and Visual Impact Assessment
- Flood Risk Assessment
- Agricultural Land Classification Assessment
- Archaeological Desk Based Assessment
- Tree Survey along with GI Plans showing 15% coverage
- Noise Survey
- Energy Report

7.10 We would be grateful if the Council would confirm the above list of documents, or advise whether any others would be required.

7.11 In conclusion, the proposals represent a sustainable extension to the existing settlement of Wadebridge and could bring significant benefits in terms of providing affordable housing, including public open space, enhancing the existing green infrastructure network, improving biodiversity and providing additional sustainable facilities.

7.12 We would welcome the Council's views on this pre-application and look forward to discussing the proposals with officers in due course. If a meeting would be useful, we would be happy to arrange and attend this. Public consultation is also to be undertaken over the coming months and we will inform the council when this is due to commence.



grassroots
PLANNING