

# *Business*

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PLANNING, URBAN REGENERATION, GRANT FUNDING  
AND ECONOMIC DEVELOPMENT CONSULTANCY

1, Riverside House, Heron Way, Newham, Truro, Cornwall TR1 2XN  
Tel: 01872 222777 E-mail: info@bls.co.uk

## **Pre-Application Advice Request**

**Proposed Cross Subsidy Policy 9 Exception Site  
Residential Development Comprising Upto 23  
Residential Dwellings (12 Affordable) Together with  
Access**

**Land off Higher Penponds Road  
Penponds  
Camborne  
TR14 0QG**

**Mr D. May and Mr. D Matthews**

**Summary Planning Statement**

**February 2024**

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## **1.0 INTRODUCTION**

- 1.1 This Summary Planning Statement has been prepared by Business Location Services Ltd, Town Planning Consultants, on behalf of Mr D. May and Mr D. Matthews in respect of proposed development on land off Higher Penponds Road, Penponds, Camborne, TR14 0QG. Pre-application advice is sought from Cornwall Council in respect of the acceptability of the principle of development for a Cross Subsidy Policy 9 exception site affordable housing led residential development of up to 23 dwellings (12 affordable), subject to viability.
- 1.2 The Summary Planning Statement should be read in conjunction with the Pre-Application document and following plans/drawings by CSA Architects:-
- Drawings
    - Drawing No. 001 Location/Block Plan
    - Drawing No. 010 Proposed Site Plan

## **2.0 BACKGROUND AND PLANNING HISTORY**

- 2.1 The subject site is located to the east of the existing built form of Penponds off Higher Penponds Road. There is no planning history in respect of the subject site considered relevant to the proposed development the subject of the pre-application advice request.

## **3.0 NEED FOR AFFORDABLE HOUSING**

- 3.1 Cornwall Council has declared a housing crisis. The Housing Strategy for Cornwall 2030 identifies four main objectives to address the housing crisis in the short and medium term, one of which requires a step change in affordable housing provision. Given the housing crisis and the demonstrable need for affordable housing it is considered that the delivery of affordable housing can only be realistically achieved through exception site developments, as with the proposed development.
- 3.2 In light of the current challenges within the housing market Cornwall Council has considered it appropriate to increase the housing supply and to remain flexible and react to changing circumstances. The Housing Strategy for Cornwall 2030 and the Housing Crisis Plan are therefore material considerations in respect of the proposed development.
- 3.3 There is an exceptionally high affordable housing need within Camborne Parish with some 1,100 persons registered on the Cornwall Homechoice Register in need of affordable housing.

## **4.0 PROPOSED DEVELOPMENT**

- 4.1 The subject site comprises some 0.6 Ha (1.4 acres) and will be served by a new access off Higher Penponds Road. The proposed development provides for upto 23 dwellings (12 affordable). Given the exceptionally high affordable housing need in Camborne Parish the proposed development provides for an affordable housing led residential development with enabling open market

housing in compliance with paragraph 82 of the NPPF, Policy 9 of the Cornwall Local Plan together with guidance in the Housing SPD. The proposed affordable housing and open market housing mix would be subject to a Financial Viability Assessment in accordance with Policy 10 of the Cornwall Local Plan.

- 4.2 The proposed development provides for the provision of up to 12 affordable dwellings (50%) and 11 open market dwellings subject to viability. The proposed affordable and open market housing mix is summarised as follows: -

Affordable Housing

7 x 2 bedroom dwellings  
5 x 3 bedroom dwellings

Open Market Housing

3 x 3 bedroom dwellings  
8 x 4 bedroom dwellings

- 4.3 The proposed indicative schematic layout will provide for landscaping, biodiversity net gain and tree planting aimed at compliance with Policy G2 and G3 of the Climate Emergency DPD. While not covered in this pre-application advice request the architectural style will be of a vernacular design with use of traditional materials and finishes including natural stone Cornish hedges.

## **5.0 PLANNING POLICY CONTEXT**

### **National Planning Policy Framework (NPPF) 2023**

- 5.1 The NPPF provides the Government's policy framework for delivering sustainable development and is a material consideration.
- 5.2 The following provides a summary of the policy guidance set out in the NPPF which is considered relevant to this planning application.
- 5.3 Section 2: Achieving a Sustainable Development. Paragraphs 7-11 set out the mechanism for achieving sustainable development, together with the presumption in favour of sustainable development in decision making.
- 5.4 Section 4: Decision Making. Local Planning Authorities should approach decisions on proposed development in a positive and creative way and that decision makers at every level should seek to approve applications for sustainable development where possible. Paragraph 47 stipulates that planning law (section 38 of the Planning and Compulsory Purchase Act 2004) requires that applications for planning permission should be determined in accordance with the development plan unless material considerations indicate otherwise.

- 5.5 Paragraph 55 stipulates that Local Planning Authorities should consider unacceptable development could be made acceptable through the use of conditions or planning obligations. Paragraph 56 states that planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development permitted.
- 5.6 Section 5: Delivering a sufficient supply of houses. Paragraph 60 states that to support the Government's objective to significantly boost the supply of housing, it is important that a sufficient amount and variety of land can come forward where it is needed and that land with planning permission is developed without unnecessary delay.
- 5.7 Paragraph 82 stipulates that planning decisions should be responsive to local circumstances and support housing development that reflect local needs and that Local Planning Authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local need and to consider whether allowing some market housing would facilitate this.
- 5.8 Paragraph 83 stipulates that to promote sustainable development in rural areas housing should be located where it will enhance or maintain the vitality of rural communities and that planning policies should identify opportunities to grow and thrive.
- 5.9 Paragraph 96 requires planning decisions to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible and enable and support healthy lifestyles.
- 5.10 Paragraph 112 stipulates that maximum parking standards for residential development should only be set where there is a clear and compelling justification that they are necessary for managing the road network or for optimising the density of development in locations that are well served by public transport. Paragraph 114 requires development proposals to provide safe and suitable access for all users and that any significant impacts on the transport network can be mitigated to an acceptable degree.
- 5.11 Paragraph 115 stipulates that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety or where the residual cumulative impacts on the road network would be severe.
- 5.12 Paragraph 116 requires all developments that will generate significant amount of movements to be required to provide a travel plan and should be supported by a transport statement or transport assessment.
- 5.13 Section 11: Making effective use of land. Paragraph 123 requires planning decisions to promote effective use of land in meeting the need for homes and other uses. Paragraph 124 gives substantial weight to the value of using sustainable brownfield land within settlements for homes while paragraph

120(d) promotes and supports the development of under-utilised land and buildings.

- 5.14 Paragraph 128 requires planning decisions to support development that makes efficient use of land taking into account the identified need for different types of housing and local market conditions and viability.
- 5.15 Section 12: Achieving Well Designed Places. Paragraph 131 promotes the creation of high quality, beautiful and sustainable buildings and places which is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 5.16 Paragraph 135 requires planning decisions to ensure that developments will function well and add to the quality of the area for the lifetime of the development. Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping and sympathetic to local character and history. Optimise the potential of the site to accommodate an appropriate amount and mix of development and create places that are safe, inclusive and accessible.
- 5.17 Paragraph 139 requires development that is not well designed should be refused especially where it fails to reflect local design policies and Government and local guidance in respect of design.
- 5.18 Paragraph 157 requires the planning system to support the transition to a low carbon future in a changing climate taking full account of flood risk and coastal change.
- 5.19 Paragraph 159 requires new development to be planned in ways to avoid increased vulnerability to the range of impacts arising from climate change and help to reduce greenhouse gas emissions.
- 5.20 Paragraph 165 requires inappropriate development in areas at risk of flooding to be avoided by directing development away from areas at highest risk.
- 5.21 Paragraph 173 requires Local Planning Authorities in determining planning applications to ensure that flood risk is not increased elsewhere.
- 5.22 Paragraph 180 requires planning decisions to contribute and enhance the natural environment by minimising impacts and providing net gains for biodiversity and preventing new and existing development from contributing, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.
- 5.23 Paragraph 186 sets out principles that should be applied by Local Planning Authorities when determining planning applications including if significant harm to biodiversity cannot be avoided or mitigated planning applications

should be refused. Paragraph 182 stipulates that the presumption in favour of sustainable development does not apply where the proposal has a significant effect on habitats unless an appropriate assessment has concluded that the proposal will not adversely affect the integrity of the habitat.

- 5.24 Paragraph 189 stipulates that planning decisions should ensure that a site is suitable for its proposed use taking account of ground conditions and risks arising from land instability and contamination.
- 5.25 Paragraph 191 stipulates that planning decisions should ensure that new development is appropriate to its location taking into account the likely effects of pollution on health, living conditions and the natural environment as well as the potential sensitivity of the site or the wider area.

### **Planning Practice Guidance (PPG)**

- 5.26 The Planning Practice Guidance seeks to bring together planning practice guidance for England in an accessible and useable way. The following PPGs are considered relevant to the planning application and are summarised as follows: -

- Climate Change
- Design: Process and Tools
- Effective Use of Land
- Flood Risk and Coastal Change
- Land Affected by Contamination
- Land Stability
- Natural Environment
- Use of Conditions
- Viability
- Water Supply, Wastewater and Water Quality

### **Development Plan**

- 5.27 The Development Plan in Cornwall relevant to the application is the Cornwall Local Plan, which was adopted on 22<sup>nd</sup> November 2016 together with the Housing SPD, Biodiversity Net Gain SPD, Climate Change Emergency DPD and European Sites Mitigation DPD. In addition, the Chief Planning Officer's Advice Note: Infill/Rounding Off, Providing Homes and Addressing Affordability are material considerations.
- 5.28 Policy 1 of the Cornwall Local Plan states that "When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained within the National Planning Policy Framework". The Policy states further that "When considering whether a development proposal is sustainable or not, account will be taken of its location, layout design and use against the three pillars of economic development, social development and environmental protection and improvement".

- 5.29 Policy 2 of the Cornwall Local Plan requires that new development provides a sustainable approach to accommodating growth, providing a well balanced mix of economic, social and environmental benefits. Policy 2 of the CLP seeks to focus on growth on the main towns where they can support regeneration and sustainable development. Policy 2(1) requires development proposals to respect and enhance the quality of space and special character of Cornwall by ensuring development is high quality and demonstrating and understanding of its location. Policy 2a of the Cornwall Local Plan sets a target for the delivery of a minimum of 52,500 homes to the year 2030 and for the Camborne Pool Illogan and Redruth Community Network Area identifies the need for some 5,200 dwellings to be provided.
- 5.30 Policy 3 of the Cornwall Local Plan seeks to manage development in the key towns and villages and the policy provides for housing delivery for affordable housing led developments and the rural exception sites under Policy 9. Rural Exception Sites are defined in Policy 3 as developments on land adjoining or physically related to the built form of settlements.
- 5.31 Policy 9 of the Cornwall Local Plan stipulates that development proposals on sites outside of, but adjacent to, the existing built up areas of smaller towns, villages and hamlets whose primary purpose is to provide affordable housing to meet local needs will be supported where they are clearly affordable housing led and well related to the physical form of the settlement and appropriate in scale, character and appearance. The affordable dwellings should reflect identified local needs as evidenced through the Cornwall Housing Register. The inclusion of market housing will only be supported where the Council is satisfied it is essential for the successful delivery of the development based financial appraisal. Market housing must not represent more than 50% of the homes or 50% of the land take excluding infrastructure and services.
- 5.32 Policy 10 of the Cornwall Local Plan provides policy guidance on managing viability and provides a mechanism and approach where a proposal cannot justify the full quota of affordable housing without affecting the viability of the scheme.
- 5.33 Policy 12 of the Cornwall Local Plan provides that development proposals will be judged against fundamental design principles of character, layout, movement, adaptability, inclusiveness, resilience and diversity and process. The policy also requires that development proposals should protect individuals and property from overlooking and unreasonable loss of privacy, overshadowing and overbearing impacts and unreasonable noise and disturbance.
- 5.34 Policy 13 of the Cornwall Local Plan requires that all new development will be expected to provide sufficient on-site open (or private amenity) space, car parking provision, and space for storage for domestic activities and recreation, as well as collection of waste, recycling and compostables.



- 5.35 Policy 16 of the Cornwall Local Plan seeks to improve the health and wellbeing of Cornwall's communities and to protect and alleviate risk to people and the environment from unsafe, unhealthy and polluted environments by mitigating against harmful impacts from air and noise pollution, water and land contamination and potential hazards from climate change.
- 5.36 Policy 23 of the Cornwall Local Plan requires development proposals 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.
- 5.37 Policy 26 of the Cornwall Local Plan relates to flood risk management and requires that development should take account of and be consistent with any adopted strategic and local flood and coastal management strategies. Section 2 of the Policy requires that development should be sited, designed, of a type, and where necessary, located in a manner that it minimises or reduces and (where possible) eliminates flood risk on the site and in the area.
- 5.38 Policy 27 of the Cornwall Local Plan provides for all development to provide a safe and suitable access and not to cause adverse impact on the local or strategic road network.
- 5.39 Policy 28 of the Cornwall Local Plan requires off-site financial contributions to infrastructure.

### **Housing SPD**

- 5.40 The Housing SPD forms part of the development plan and sits below the CLP and provides operational, technical and detailed guidance to support the delivery of residential developments and affordable housing. The SPD in respect of affordable housing led exception site developments provides more detailed guidance in respect of the design and distribution of affordable housing and viability.

### **Biodiversity Net Gain SPD**

- 5.41 The Biodiversity Net Gain Supplementary Planning Document (SPD) forms part of the development plan sites and provides additional policy guidance in respect of opportunities for biodiversity within the development process with particular focus on Policy 23 of the Cornwall Local Plan.
- 5.42 Arising from BSPD from the 1<sup>st</sup> March 2020 all major developments i.e. in excess of 10 dwellings must demonstrate at least a 10% net gain in biodiversity.

### **Cornwall Climate Change Emergency DPD**

5.43 The Cornwall Climate Change Emergency DPD has been the subject of examination and substantial weight is now given to policies within the DPD. The following policies are considered relevant to the proposed development: -

- Policy C1 Climate Change Principles
- Policy G2 Biodiversity Net Gain
- Policy G3 Canopy
- Policy T2 Parking
- Policy SEC1 Sustainable Energy and Construction
- Policy CC3 Reduction in Flood Risk
- Policy CC4 Sustainable Drainage System Design

**Chief Planning Officer's Advice Note: Infill/Rounding Off (December 2017)**

5.44 The Chief Planning Officer's Advice Note Infill/Rounding Off is aimed at providing a guide to greater consistency in planning decision making and, although it does not form part of the development plan, it is a material consideration for the purpose of this planning application. The Advice Note seeks to provide clarity for unplanned growth within and adjacent to Cornwall's large towns, villages and hamlets.

5.45 The Advice Note specifies that rural exception sites which are affordable housing led outside of the built up area should be adjacent to or well related to the built up area of the settlement and to be appropriate in scale, character and appearance.

**Chief Planning Officer's Advice Note: Providing Homes**

5.46 The Advice Note provides a guidance following the declaration by Cornwall Council that Cornwall is experiencing a housing crisis and seeks to stimulate the supply and delivery of open market and affordable housing. Securing homes for all is a plan to respond to the housing crisis and sets out a number of objectives and interventions aimed at stimulating the delivery of housing, one of which is the increased availability of homes for local residents. The Securing Homes for All plan is a material planning consideration relating to the delivery of housing.

**Chief Planning Officer's Advice Note: Addressing Affordability**

5.47 The Chief Planning Officer's Advice Note is part of the Council's response to the housing crisis and seeks to improve the affordability of homes for residents.

**6.0 SUMMARY**

6.1 Pre-application advice is therefore being requested to establish the principle of the acceptability for a Policy 9 exception site affordable housing led

residential development for upto 23 dwellings (12 affordable) subject to viability on the subject site. The proposed development and indicative schematic layout is aimed at contributing to meeting the high local affordable need in Camborne Parish.