

# Bodmin Town Council



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The Planning Inspector  
C/O Programme Officer  
Cornwall Council  
Room 105  
39 Penwinnick Road  
ST. AUSTELL  
PL25 5DR

Date: 2 July 2018

Our Ref: SMF/P/2018

Your Ref:

Dear Sir,

## **Bodmin Site Allocations DPD**

I write in connection with the Bodmin Site Allocations DPD and further to the Examination Hearing held on 15 March to which Councillor Pete Skea represented Bodmin Town Council on matters specific to Bodmin.

Bodmin Town Council's Planning Committee, which met on 20 June 2018, has instructed me to write to you to set out a number of areas where it feels the planning system is in part failing to adequately support communities that are open to growth.

It should be emphasised that whilst Bodmin Town Council has been supportive of a growth pattern of 3,000 homes over the Cornwall Local Plan period to 2030, the Town Council's concerns relate to various elements that development and growth can bring.

The key message is that where a town or community is open to a growth model (to assist both the local planning authority and central government realise housing targets), it should be recognised for prioritisation of support through section 106 or community infrastructure levy or any other funding mechanism to mitigate any short-term harm that expansion and increasing population can bring - in an ideal scenario this would see community infrastructure being prioritised to those communities where growth is being delivered but in essence there needs to be a balance to provide education, community infrastructure such as parks and open spaces (to include sports pitches for health and wellbeing) and NHS commissioning recognising emerging growth patterns to deliver increased capacity for GP's, dental surgeries etc.

Bodmin Town Council has been fairly consistent with its approach to consultation responses to the Bodmin Masterplan (2011), Core Strategy (2012), Town Framework Plan (2013) and the Cornwall Local Plan including Site Allocations DPD (2014 through to 2016).

The key issues, which remain live topics today, are as follows (not in order of priority):

If Bodmin is to expand there needs to be significant assessment of the leat and careful development to ensure that there is sufficient hydraulic capacity to cope with additional growth. The Environment Agency have identified areas of the town where there is anticipated degradation of the leat culvert and any future plans need to recognise that improved infrastructure is not only about the road network and vehicle capacity / movements around the town, but also ensuring that the urban drainage system can effectively handle additional growth and increased surface water run-off.

Bodmin Town Council welcomed the statement in the Cornwall Local Plan – Strategic Policies 2010 – 2030 (BTC consultation response 2014) which would require developments of the centre to contribute to improvements to the leat network. The Town Council considered that there is a significant contributory factor to surface water flooding in the area of Flaxmoor Terrace and increased surface water flows down and along both Launceston Road and Priory Road which has been generated by developments in the east of the town and in the Callywith gate area. The additional surface water runoff which eventually enters the leat is increasing the volume of water that the system has to accommodate and also the amount of sedimentary material that is ultimately deposited into Priory Pond which has an impact both on the biodiversity in that water feature but which also, over time, reduces its hydrological capacity as part of the town flood defence measures. As the lucky recipient of all of this water runoff occasioned by new developments, it is hoped that the local ratepayers via Bodmin Town Council as landowner for Priory Park do not have to pick up the dredging bill due to an inability for any payments to be forthcoming via developer contributions to Cornwall Council as the Local Lead Flood Authority.

The Town Council therefore requested that community benefit payments from the planning process are earmarked to improve the leat network to be able to better manage and build in future capacity to accommodate town growth.

The Town Council considers it imperative that Cornwall Council, as the Local Lead Flood Authority, adopts a stronger position by stipulating developer contributions towards the improvement of the leat as any emerging growth in the east (up-stream) will have repercussions in the west. Failure to improve the capacity of downstream sections of the leat could lead to water 'backing-up' the system with localised flooding in the heart of the town. Securing funding by way of the planning process should be a priority given the intention to deliver 3,000 new homes as part of the allocations plan for Bodmin.

Bodmin Town Council's position has been to welcome a growth model which triggers higher quality jobs and infrastructure improvements, in all its forms, that can lead to economic prosperity for local business and residents of the town. The Town Council is prepared to support the higher level of growth, with the associated benefits that the

increase in critical mass could generate, but it was clear that this would need to be supported with the necessary investment in infrastructure - both road (northern link road) and green infrastructure. This will maintain a healthy environment and support and protect the special nature of the Beacon LNR and the further extension of the Camel Trail into the town centre, together with links with the Lanhydrock Cycle Hub. There is also a need for community infrastructure to support additional housing.

In terms of Bodmin related growth the Town Council would emphasise the need for this to be supported and underpinned by mixed employment and retail growth that drives up the economic base of the town, improves the retail offer in the town centre and provides higher paid jobs. Bodmin Town Council has urged, through various consultation responses, that any development (eastern, western and northern), is sustainable – ensuring that there is sufficient housing provision, employment / work space, leisure and education facilities and that these areas act as small hubs (communities) which link in with the core hub (community) of Bodmin town centre. The links with 'out of town retail parks' and the town centre need to be carefully managed at the planning / development control stage to ensure that any out of town development is not at the detriment of a vibrant town centre economy.

In 2016, the Town Council provided a consultation response to the Cornwall Site Allocations Development Plan Document – Preferred Options Consultation. In that response, the following key issues were identified by Bodmin Town Council:

### **Education**

Bodmin Town Council strongly supports and welcomes the allocation of a new primary school in the BdUE3 – St. Lawrence's Urban Extension – and considers that given the pressure on existing primary schools in the town, a new school is needed sooner rather than later.

The Town Council is however firmly of the view that St. Petroc's Primary School should be ruled out completely as a site that can accommodate any further expansion as it would only lead to severe harm in the locality given its location in a constrained residential area particularly when taking into account the number of existing vehicular movements in the peak a.m. and p.m. school start and finish times.

The remaining primary schools in Bodmin are unlikely to offer much scope for expansion with the exception being Berrycoombe. However, that school also has similar constraints when compared with St. Petroc's as it is located at the end of a residential neighbourhood at Tredanek Close and will only lead to increased vehicular movements through a housing estate with no parking provision other than on-street which leads to disputes.

Bodmin Town Council's preference would therefore be the development of a new purpose built primary school in Bd-UE3 with good road transport links and access arrangements. Any new school should be carefully designed to be better placed to avoid problems as experienced at St. Petroc's School i.e. consideration to site layout, access / egress and scope for modest expansion to enable some growth with the community without leading to massing and parking conflicts with local residents.

However, that is a significant build cost and the unitary council needs to ensure that delivery of that facility takes place to ensure that there will be school places and that existing schools are not crippled whilst a new school is mooted.

### **Healthcare**

Bodmin Town Council would recommend that discussions around the future of GP healthcare provision continue and are progressed with some degree of alacrity. The co-location of GP's with the Bodmin Minor Injury Unit would seem to offer an opportunity for enhanced service delivery and any onsite training whilst offering an ability to 'throttle back' the demand placed on Treliske and Derriford by offering a site where multiple services and skills are provided and which could meet the delivery of a strategic Urgent Care Treatment Centre given Bodmin's location at the geographical heart of Cornwall on the conflux of the A30 and A38. This would probably seem logical from a strategic road transport perspective as well given patient journey / travel times.

The Town Council would also recommend that Dental healthcare is considered as part of the mix as this would be a single centre for health in Bodmin limiting the number of journeys needed to be made by the public to access a range of health care needs.

### **Transportation**

The Town Council has recently benefitted from the delivery of a low speed environment, which whilst considered to be 'marmite' by some, it appears to have reduced vehicular speed and opened up modal shift opportunities through the delivery of wider footpaths (pedestrian and cyclists) where achievable.

The Council is supportive of work to explore the opportunity to re-establish the passenger rail link from Bodmin General Station to Bodmin Parkway which would assist with underpinning the town centre economy whilst making social and leisure trips on the rail network more user friendly and part of an integrated transport option. This could have a number of economic benefits for a town that does not have a direct rail link with its town centre as Bodmin Parkway station is located at least 4 miles outside of the town and many are reliant on private car journeys given the current lack of integration with public transport.

Concerns have been raised in the past regarding the problems for passengers at Bodmin Parkway given the difficulties with harmonising a bus timetable with the rail departure / arrival times and if this connection can be re-established at Bodmin General these issues could be significantly reduced. A town centre connection to Bodmin Parkway would therefore be of significant strategic benefit to the town as it would make business and social trips more direct cutting out any additional hurdles for arrivals to / from Parkway.

Given the new Callywith Campus (Truro & Penwith College) it would also make access easier for students commuting from Liskeard, Looe etc reducing road transport journeys along the A38 corridor. It would also open up opportunities for students along the St. Austell branch line and there is undoubted advantage for tourism related journeys into Bodmin.

## **Green Infrastructure**

Bodmin Town Council would strongly resist any development to the southern corridor to the Bodmin Beacon Local Nature Reserve given the need to protect the biodiversity corridor to this locally important area of open space.

Given the contracting fiscal landscape with funding to local authorities there needs to be a strong commitment through the planning process to recognise the role of local (parish and town) councils in the provision of existing and the maintenance of new play sites. To that end, there would seem to be merit in strategic play sites being recognised by the planning authority with funding being extracted from developers to contribute towards the cost of new equipment, particularly targeting teen provision, as it is acknowledged that this age group is under provided for.

The Town Council is also of the firm view that there are insufficient sports pitches with changing facilities to cater for the current number of organised sports teams in Bodmin. To support the future growth model there needs to be land being brought forward to support any increased housing. Access to sports pitches can encourage healthier and more active lifestyles contributing positively to the future health of the community. To achieve this aim sports pitches need to be delivered by way of the planning process to set aside the appropriate space with funding as the catalyst for new facilities being brought forward.

To date, contributions from developments seem to only achieve affordable housing, education and highways improvements with open spaces losing out from any financial support. Whilst this is vital, there needs to be a fairer system to achieve a better balance and it seems all too easy for planning authorities to accept a small 'on site' tokenistic offer (a small play space) from a developer rather than taking a holistic / approach to the town, supporting strategic play sites and enhancing the offer for a wider audience. Planning authorities, such as Cornwall Council, will need to give some serious consideration to putting in place a mechanism or financial algorithm to lever funding to support new and existing sites. Whilst small areas of open space have been provided by developers on site, there would appear to be a lack of any joined-up approach with the Cornwall Council Green Infrastructure Strategy and a more strategic view on the delivery of this community infrastructure across the town.

## **Accessible homes**

The Town Council noted the requirement throughout the site allocations document for Bodmin which indicated a target of 'at least 25% of the dwellings should be provided as accessible homes.' Bodmin Town Council is firmly of the view that there needs to be some flexibility rather than a rigid one size fits all approach to each and every scheme coming forward. The Town Council has aspirations for some developments to be ring fenced for higher spec housing to attract managers and executives to the town in the interests of sustainability as this demographic has traditionally commuted into Bodmin from the surrounding villages. Whilst the Town Council is supportive of there being the right mix of houses on developments it is of the view that in some cases there need to

be exceptions and should a broad brush 25% policy be implemented, there should be flexibility to remove the 25% from these higher spec housing schemes.

The Town Council would support higher spec housing being accommodated without the need to provide affordable units directly in the same development / neighbourhood. Bodmin Town Council urged Cornwall Council and the Planning Department to be open to having a discussion with the Town Council on whether within any Bd allocation it would be possible to ring fence an area for higher spec housing, whilst applying an accessible homes target to the remaining parcels in that particular Bd allocation i.e. through careful design and site layout the Town Council considers that there should be an ability to deliver higher spec housing with accessible homes forming the next and subsequent phases of development. The Town Council does not consider that it would be appropriate to mix accessible homes with higher spec housing. Whilst this stance might not sit comfortably with national policy, the Town Council is firmly of the view that allocating a percentage as 'affordable' or 'accessible' in with higher spec housing has not worked well in the past and should not be considered appropriate for some schemes. The Town Council strongly reiterated its view that developments of higher spec housing should be delivered without a 25% requirement as the Council is keen to raise the demographic profile. This ambition does not preclude accessible homes being built but merely requests that site layout leads to high spec and accessible housing being segregated.

Bodmin Town Council is broadly supportive of the Allocations DPD but emphasised that applying a 25% accessible housing target to each and every development would not be conducive to the aspirations to bring forward higher spec housing. The Town Council would also highlight that for the local council sector to acquire and be responsible for the provision and maintenance of open spaces there needs to be financial support by way of developer contributions. As parish and town councils are facing the prospect of a central government imposed 2% cap on precept increases at some point post 2020, the ability for local councils to be in a strong position to enter agreements without non-precept orientated income is going to become increasingly difficult.

It is noted that given the anticipated growth of the town over the plan period Bodmin's population is expected to rise to over 21,000 with the most significant increase expected in the over 65 age group. With this in mind, Bodmin Town Council considered that there need to be appropriate housing schemes coming forward of the right mix to assist people in later life with access to appropriate dwellings and to also facilitate downsizing which helps release family properties (3 and 4 bed) onto the market. This life cycle of release of older properties and development of new properties will cater for this trend and assist with a sustainable community model.

The Town Council would support some higher spec housing being accommodated without the need to provide affordable units and urged Cornwall Council and the Planning Department to be open to having that debate with the Town Council on appropriate and perhaps smaller sized development plots not within the Bd allocation, rather than stringently applying a broad brush policy and ruling this out as an option and without dialogue.

There was broad consensus at the time with the housing allocation for the various sites identified in the plan although it was recognised that the more challenging site is the Halgavor land parcel given hydrological issues in developing BdUE2. The Council at the time thought that it might be necessary to consider a lower density housing allocation, as per BdUE4, to attract developers to that site as there will probably be higher costs associated with addressing water table concerns given the presence of springs, sinks and collects. This lower density requirement should hopefully then ensure that sufficient s106 contributions are levered to support the transport infrastructure improvements in the area such as an improved vehicular link across the railway line from Carminow Road to Respryn Road.

However, the Town Council's position has changed with respect of BdUE2 given the hydrological concerns and it would press for a range of measures to be carried out, such as environmental impact assessments and detailed hydrological tests, to assess viability of that site for development. Given public representation regarding BdUE2 and the concerns that the Town Council has around surface water, springs and the water table in that area, and the impact to the ecology given the potential loss of moorland habitat, it might be more appropriate for a much lower density figure to be considered on only part of the allocation. Whilst this would then lead to a debate about where any housing allocation shortfall should be 'topped up' it would be an opportunity to consider more appropriate areas for development and for developers to have a meaningful dialogue with the local council from the outset rather than communities facing the perception that matters are 'done deal' at the early stages via discussions with Planning Officers.

Bodmin Town Council's Planning Committee instructed me to write along these lines in light of the recent examination process regarding the Bodmin Site Allocations DPD and to highlight areas of frustration which it considered you as an Examiner might value as part of your future considerations as part of any examination process.

The Town Council's Planning Committee would also request that consideration is given to the relevant sections of the National Planning Policy Framework as follows:

Section 118 – *'When determining planning applications, local planning authorities should aim to conserve and enhance biodiversity'* – if the BdUE2 allocation remains an appropriate development site it might be considered an opportunity to encourage and incorporate biodiversity in and around any development to mitigate any 'harm.' This may well be seen as a positive step by local people should the allocation be endorsed.

Section 121 – *'the site is suitable for its new use taking account of ground conditions and land instability, including from natural hazards or former activities such as mining, pollution arising from previous uses and any proposals for mitigation including land remediation or impacts on the natural environment arising from that remediation.'*

Bodmin Town Council would again highlight grave concerns regarding the hydrological issues and the need for a robust environmental impact assessment.

If BdUE2 is considered an appropriate allocation then Bodmin Town Council would welcome an opportunity to input into any masterplan design with the local planning authority and a developer to ensure that any development aligns with the town's aspirations and to positively explore Section 118 of the NPPF to mitigate environmental harm by incorporating biodiversity into and around any scheme.

Thank you for taking the time to read this letter and any comments or observations you may have would be greatly appreciated (on a without prejudice basis).

Yours faithfully,

A handwritten signature in black ink, appearing to read 'S.M. Facer'.

S M Facer  
**Town Clerk**

Cc: Councillor S Kinsman (Mayor of Bodmin);  
Councillor A Coppin (Chairman, Planning Committee)