WEST LANGARTH, THREEMILESTONE, TRURO

PLANNING STATEMENT

PREPARED FOR
INOX GROUP AND HENRY BOOT DEVELOPMENTS

August 2014
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1. Introduction

1.1 This Planning Statement (“statement”) is prepared, on behalf of the Inox Group and Henry Boot Developments, in support of an outline planning application for the mixed use development of land at West Langarth, Threemilestone, Truro.

1.2 The statement describes the application site and the planning context and proposed development. It also includes an assessment of the relevant planning policy context and analyses the key planning matters associated with the proposed development.

1.3 The application site lies adjacent to land identified in the Land North of A390 Threemilestone Development Brief (2012). The application site (the “site”) therefore lies adjacent to the wider mixed use Langarth proposal, which received outline planning permission (PA11/06124) in July 2013, and is within close proximity (within 1km) of the consented Stadium for Cornwall site, which has received outline planning permission (PA11/06125) and subsequent reserved matters approval (PA12/09036).

1.4 The development is proposed as enabling development for the Stadium for Cornwall. The development will deliver an integrated extension to the wider Langarth proposals and, combined with the local centre included within that proposal, will deliver everything required to meet the requirements of a district centre.
2. **Site Description**

2.1 The site extends to circa 17.64 hectares (ha) and currently comprises of five agricultural fields (four arable and one pasture) and an agricultural building.

2.2 There are a number of hedgerows and trees within and around the boundaries of the site. The northern boundary of the site is formed by small watercourse/stream (Langarth Stream) that is a tributary of the River Kenwyn. A public right of way cross the south east corner of the site and continues to the north adjacent to the eastern boundary of the site.

2.3 The site does not contain or form part of any statutory designations (such as Areas of Outstanding Natural Beauty, Sites of Specific Scientific Interest, etc.). The site lies to the north of a designated World Heritage Site (Cornwall and West Devon Mining Landscape).

2.4 The site is located approximately 1 km north west of the Langarth Park and Ride, 1.5 km to the north west of Threemilestone, 2 km west of Treliske and 6 km west of Truro city centre. A bus service operates along the A390 providing access to these locations.

2.5 Truro is the largest settlement in Cornwall and 16% of the county’s jobs are located within the Truro and Roseland area. There are a range of employment opportunities present at Truro and there is a broad range of services and facilities including schools, doctors, dentists and leisure provision.

2.6 At Treliske there is a range of retail, employment and leisure provision that will serve the proposed development. Additionally, the Royal Hospital Cornwall is within 2 km of the site on outskirts of Treliske.

2.7 Threemilestone is the nearest village located approximately 1km to the south east of the site. The Threemilestone retail and industrial parks are
within 1km of the site. The centre of Threemilestone is approximately 1.3km of the site and provides access to a variety of services and facilities, which include; a convenience store, post office, pharmacy, medical practice, car dealership, repair garage, several takeaways/cafes and a social club.

2.8 The position of the site adjacent to the Langarth proposal and within close proximity of Threemilestone, Treliske and Truro does currently and will further (once Langarth has been constructed) provide the application site with good accessibility to services, facilities and employment.
3. **Site Planning Context and History**

3.1 The application site lies adjacent to the broader area of land which is the subject of a Development Brief ("DB") (Land North of the A390, Truro / Threemilestone) adopted by Cornwall Council, as a material consideration in the determination of related planning applications, on 25 January 2012.

3.2 In the context of the DB, outline planning permission (PA11/06124) has been granted (10 July 2013) for the proposed Langarth development on land adjacent to this application site – immediately to the east – as well as detailed consent for the Stadium for Cornwall.

3.3 The Langarth proposal involves the provision of a large mixed use scheme, comprising in summary of:

- 1,500 dwellings (C3);
- Retail and Restaurants (A1/ A3);
- Hotel (C1);
- Employment floorspace (B1/B8);
- Primary School (D1);
- Community Space (D1);
- Care Home (C2); and
- Public open space.

3.4 The application scheme proposes a mixed use development that will be fully integrated with the proposed development of the wider Langarth site and is in accordance with the principles of the Council’s DB (albeit outside of the defined area).

3.5 There is no other relevant planning history related to the site.
4. **The Proposed Development**

4.1 The proposal is a mixed use development that will form an integrated extension to the wider Langarth proposal. The proposed development is advanced as enabling development for the Stadium for Cornwall and will directly link to that stadium and the consented local centre that lies adjacent to the stadium site.

4.2 The description of development, for which outline planning permission is applied for, is:

"Outline mixed use proposal for retail (Use Class A1) with associated petrol filling station and car parking (providing space for mobile library), food and drink (Use Classes A3, A4 and A5) / day nursery (Use Class D1) and residential (Use Class C3) alongside the provision of a community and sports facility (Use Classes D1 and D2), public open space (including formal playing pitch provision), and other associated infrastructure (inclusive of linkage to consented Langarth/Stadium sites). [Means of access to be determined only]"

4.3 The proposed mixed use development therefore involves the provision of a broad range of uses that will provide prospective residents of both this scheme and the wider A390 Development brief area with access to a range of retail, community and leisure/recreation uses (district centre uses). The provision of a District Centre as whole is further compounded when the application proposals are combined with the local centre and employment uses proposed within the adjacent Langarth site.

4.4 In terms of the quantum of development proposed the following sets out an overview of the scheme:

- Up to 130 residential units (use class C3) ranging from two to four storeys (ridge heights between 9 and 15 metres).
- Petrol filling station with 12 pumps and extending to a maximum height of 8 metres (top of canopy).
- Provision of sports pitches (two adult and one junior) and other public open space/ landscaping.
- Car parking – capable of accommodating 650 spaces and a requirements for a mobile library

<table>
<thead>
<tr>
<th>Use</th>
<th>Floorspace GIA (sq. m)</th>
<th>Floorspace GEA (sq. m)</th>
<th>Height details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Community and Sports Facility (D1, D2)</td>
<td>500</td>
<td>515</td>
<td>Maximum of 8 metres (1 storey)</td>
</tr>
<tr>
<td>Retail (A1)</td>
<td>10,219</td>
<td>10,536</td>
<td></td>
</tr>
<tr>
<td><strong>Food store (primarily convenience provision)</strong></td>
<td>5,574</td>
<td>5,747</td>
<td>Maximum of 8 metres (1 storey)</td>
</tr>
<tr>
<td><strong>Open A1 (Comparison goods) Retail Units</strong></td>
<td>4,645</td>
<td>4,789</td>
<td></td>
</tr>
<tr>
<td>Food and Drink / Day Nursery (A3, A4, A5, D1)</td>
<td>929</td>
<td>958</td>
<td>Maximum of 15 metres</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td><strong>11,648</strong></td>
<td><strong>12,009</strong></td>
<td></td>
</tr>
</tbody>
</table>

4.5 The illustrative masterplan submitted shows how the range of uses proposed could be delivered on the application site.

4.6 The housing areas indicated on the site could provide a mix of sizes and types, including 2, 3 and 4 bed units.

4.7 The average density of the proposed residential within the scheme is approximately 43 dwellings per hectare (dph) and the proposed dwellings are between 2 and 4 storeys in height.

4.8 The proposed access drawing submitted shows how the site can be safely accessed from the highway network/A390.
4.9 The open space included in the scheme enables the provision of formal sports pitches, informal amenity open space and children’s play areas. In terms of the residential areas identified within the site it is important to note that incidental amenity open space will be provided as required within these areas. In addition to this, due to the interrelationship/connectivity between the site and the adjacent Langarth scheme it will also be possible for residents of this scheme to benefit from/utilise the open space provision on that site (particularly the proposed formal playing pitch space).

4.10 The public right of way that crosses the south east corner of the site will be retained and enhanced as appropriate.

4.11 The application proposals will provide an element of affordable housing provision that will be up to 35%. The exact provision will be agreed with the Local Planning Authority and set out in a Section 106 Agreement.

**Lighting**

4.12 The detail of lighting and position of lighting is currently unknown as this is an outline proposal with all matters except for access reserved. The detailed positioning and specification of lighting will therefore be determined at the detailed design/reserved matters stage. It is therefore not appropriate at this stage to assess lighting in detail but instead undertake detailed assessment at the detailed design stage.

4.13 At the outline stage it is considered appropriate to highlight how the detailed design of lighting should be advanced to ensure no adverse impacts result. In terms of sensitive receptors there are existing residential properties, proposed residential properties and ecology (specifically Bats) which need to be considered when devising a lighting strategy and deciding on the positioning and type of lighting used within the various parts of the site. In the context of these receptors and to reduce any associated impact, any lighting proposed on the site should use shrouded, LED and/or directional as per guidance provided by the
Institute of Lighting Engineers. These measures will serve to minimise light spill and reduce any associated impacts.

**Sustainability**

4.14 A standalone Sustainability Statement has been submitted as part of the application submission and this sets out further detail on the proposed approach to sustainability.

4.15 It is considered that proposed development responds in full to best practice national planning guidance for sustainability and exceeds the minimum standards required by 2013 Building Regulations. The development will be sustainable in the following ways:

- **Economy:** Local jobs will be created on site from fuelling the local economy through its construction and ensuring appropriate employment facilities are provided close by to reduce the need for unnecessary travel for basic services and work.

- **Transport:** Sustainable transport modes such as cycling and walking are to be promoted through the provision of dedicated pathways connecting to established routes into and around Truro. The development will be linked to an established Park & Ride facility near the site, providing direct and cost effective transport into the City Centre. All dwellings will be provided with ‘home office’ facilities which will facilitate working from home and reduce unnecessary car journeys.

- **Environment:** A variety of green spaces and buffer zones will be provided and these will integrate with the existing wildlife habitats found on the site. Trees and Cornish hedges will be retained as illustrated in the landscape strategy with appropriate buffer zones, maximising the sustainable use of existing resources. Planting schemes should be in preference for native and / or wildlife attracting species. Wetlands and swales will be incorporated, promoting sustainable drainage, enhancing biodiversity, assisting in delivering local cooling in summer and reducing air pollution.
focus on energy efficiency and incorporating renewable technologies will reduce the carbon dioxide emissions from the site below a 2010 Building Regulations baseline.

- **Community:** A range of open green areas, play spaces, share surfaces and dedicated community spaces and a facility will help to encourage social interaction across the development.

### Energy Production and Conservation

4.16 All residential dwellings will benefit from energy efficient techniques such as reduced U-values via an enhanced fabric specification, highly efficient gas boilers, enhanced heating controls and an air tight build. The focus on enhanced fabric energy efficiency is an economically prudent strategy that maintains the maximum carbon dioxide savings over the lifetime of the development.

### Selection of Materials

4.17 The selection of construction materials for all of the new buildings will favour those with the lowest environmental impact over their life-cycle. Timber will be sourced from well-managed and licensed European sources to reduce transportation emissions. Efforts will be made to source locally available building materials wherever possible.

### Solar Access and Daylighting

4.18 The majority of dwellings have main living rooms that face due south. This assists in the maximum use of passive solar gains for heating, reducing the demand for central heating and associated carbon dioxide emissions. Wherever practicable, windows will be sized to take maximum advantage of natural daylight. This will again reduce the heating demand but will also limit the energy demand for electric lighting.
Water Conservation

4.19 To reduce water consumption within all residential dwellings to a total of no more than 125 litres per person per day, water efficient sanitary devices will be installed. This will potentially include dual flush WCs, spray/aerated taps, and reduced flow showers. Water meters will be installed in all homes/buildings to encourage future occupants to make maximum water savings.

Sustainable Drainage

4.20 The proposed development will incorporate Sustainable Drainage Systems, into the surface water management train, to control and treat surface water runoff at source. To provide both habitat enhancement and maintain groundwater flows, similar to the existing drainage regime, it is proposed to utilise a combination of both infiltration and above ground storage techniques. This approach was supported by the Environment Agency within the adjacent Langarth development and it is therefore logical that it should be replicated through adjacent developments.

4.21 It is proposed that the commercial area will drain to a system of swales and wet ponds which will integrate with the green infrastructure and provide amenity enhancement. Prior to entering the wet ponds, swales and permeable paving will be incorporated in the upstream system to improve water quality of surface water runoff. The downstream ponds will provide the storage element of the system with the intercepted surface water stored above the permanently retained water level. The outfall from the system will be restricted to the calculated 1 in 1 year Greenfield runoff rate, for the undeveloped site, and therefore represents betterment to the downstream catchment up to the 1 in 100 year plus 30% climate change rainfall event.

4.22 The infiltration aspect of the drainage proposal, that will re-charge groundwater levels, will be provided through private soakaways and permeable paving within the residential areas. Where feasible, parking
courts or private drives will be constructed using permeable paving to treat surface water prior to infiltration.

**Domestic Recycling**

4.23 Residents of homes will be provided with bin stores, which will include sufficient space to accommodate the local authority refuse and recyclable waste collection service.
5. **Planning Policy Context – The Development Plan**

5.1 The development plan relevant to the proposed development comprises of:

- The ‘saved policies’ of the Carrick Local Plan (1998); and
- Balancing Housing Markets DPD (February 2008)

**The Carrick Local Plan**

5.2 The Carrick Local Plan (the ‘Plan’) was adopted April 1998 and as such was prepared in line with the previous Cornwall Structure Plan adopted in 1990 (now revoked) and the range of superseded planning policy guidance, including PPG3 Housing (published March 2000).

5.3 The Plan does not define a development boundary to Truro and makes no land allocations to provide for necessary growth past 2001.

5.4 The Plan is significantly out of date and can only be accorded limited weight in the determination of this outline planning application, in accordance with the guidance set out at paragraph 215 of the Framework.

**Balancing Housing Markets DPD (2008)**

5.5 The Balancing Housing Markets DPD was adopted by Carrick District Council in February 2008.

5.6 The DPD contains a range of specific policies which detail how development for housing should provide for a mix and range of dwelling types and be built at an appropriate density having regard to the characteristics of the site and the viability of the proposal.

5.7 The DPD also outlines the requirement to deliver 35% affordable housing (20% social housing and 15% intermediate) at Truro (Policy BHM2). This is the relevant policy when considering urban extensions to Truro.
6. **Other Material Considerations**

6.1 This section of the statement outlines other material considerations that are relevant to the proposed development.

**The National Planning Policy Framework (2010)**

6.2 The National Planning Policy Framework (the Framework) sets out the Government’s planning principles and policies for England and how these are expected to be applied.

6.3 The adopted Carrick Local Plan is out of date being prepared pre-2004 therefore the weight that should be accorded to relevant saved policies polices is according to their degree of consistency with the NPPF; the closer the policy to the framework then the greater the weight that should be accorded to it (paragraph 215). The NPPF also outlines that weight can also be accorded to the provisions of emerging plans according to the stage they have reached in their preparation, the extent to which there are significant unresolved issues (paragraph 216) and the degree of consistency with the Framework.

6.4 Paragraph 49 of the Framework states that:

"Housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites."

6.5 As is shown later in this section of this statement (paragraphs 6.12-6.19), Cornwall Council does not currently (as of April 2013) have a five year supply, therefore relevant policies for the supply of housing in the development plan are out of date and the application proposals should be determined in accordance with paragraph 14 of the Framework.
Sustainable Development

6.6 Furthermore, the Framework establishes the “presumption in favour of sustainable development” (paragraph 14) and with relevance to making decisions on planning applications it states that:

“For decision-taking this means:

- approving development proposals that accord with the development plan without delay; and
- where the development plan is absent, silent or relevant policies are out-of-date, granting planning permission unless:
  
  - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
  - specific policies in this Framework indicate development should be restricted.”

(Own underlining)

Decision-taking

6.7 In making planning decisions local planning authorities are required to “approach decision-taking in a positive way to foster the delivery of sustainable development” (paragraph 186). It is further outlined at paragraph 187 that:

“Local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible. Local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area.”

Retail

6.8 The Framework establishes (paragraph 24) that the sequential test should be applied to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan. It is further stated that applications for main town centre uses
should be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered.

6.9 The Framework establishes (paragraph 26) that when assessing applications for retail, leisure and office development outside of town centres, which are not in accordance with an up-to-date Local Plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold (if there is no locally set threshold, the default threshold is 2,500 sq m). It is further stated (in paragraph 26):

"This should include assessment of:

- the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and
- the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to five years from the time the application is made. For major schemes where the full impact will not be realised in five years, the impact should also be assessed up to ten years from the time the application is made."

6.10 A Retail Statement is submitted as part of the outline planning application and considers the above matters in detail.

**Other Relevant Sections**

6.11 Other relevant paragraphs of the Framework include:

- Paragraphs 29, 32 & 34 – Transport and Highway Safety
- Paragraphs 100 & 103 – Flood Risk
- Paragraphs 109 and 111 – Conserving and enhancing the natural environment - Ecology and Nature Conservation
- Paragraph 120 and 121 – Pollution/Contaminated Land/Ground Conditions
- Paragraph 128, 129 & 132 – Archaeology and Heritage Assets
6.12 The policy framework established by these paragraphs of the Framework have been addressed through the preparation of a range of specialist and technical studies and assessments that are submitted as part of the outline planning application and which are discussed in the subsequent section of this statement.

**Enabling Development**

6.13 The proposed development is enabling development for the Stadium of Cornwall. As Christopher Lockhart-Mummery's opinion of (22/08/2014) states "This appears to be a once in a lifetime opportunity to secure delivery of the stadium and the major public benefits that would follow" (paragraph 5). The application proposals therefore provide the opportunity to deliver this.

6.14 It is established by case law that when such a proposal is advanced then it appropriate to give it due consideration.

6.15 An Enabling Statement and two legal opinions (22/08/2104 and 20/09/2104) have been provided as part of the planning application submission and cover this matter in detail.

**Housing Position**

6.16 The Cornwall Housing Land Availability Assessment 2012-2013 (provides the most up to date information on the current housing position in Cornwall.

6.17 At present there is no adopted housing target for Cornwall. A figure is being progressed through the plan making process however this has not be subjected to Examination (current consultation on proposed submission version March/April 2014) and has outstanding objections remaining particularly in relation to the housing target.
6.18 In the absence of an adopted target and with an emerging target that has not been sufficiently tested through the plan making process (pre-Examination stage) it is appropriate to rely on a figure which is the most up to date and has been subject to the most scrutiny. In this case it is appropriate at this point to rely on the figure being proposed for Cornwall in the Proposed Changes version (July 2008) of Draft Regional Spatial Strategy (RSS), which contains a figure that has been fully tested at an Examination in Public.

6.19 The draft RSS (Proposed Changes – July 2008) proposes 68,200 dwellings for the whole of Cornwall (35,000 in the West Cornwall HMA, 13,400 in North Cornwall and 6,000 in Caradon) over the period 2006-2026. This equates to 3,410 dwellings per annum.

6.20 It is further outlined in relation to former Carrick District specifically that 10,900 dwellings will be provided on the following basis:

- 1,000 should be within the existing urban area of Truro; and
- 5,400 to the west and south of Truro.

6.21 The SHLAA 2013 and Cornwall Monitoring Report confirms levels of past housing completions. It is clear from these documents that 17,854 dwellings have been provided since 2006 (over the last seven years). This is 6,016 dwellings short of the 23,870 dwellings that should have been provided.

6.22 Based on the Council’s information contained in the 2013 SHLAA and in the context of the Draft RSS housing requirement, the five year housing supply position outlined in the table overleaf is currently applicable to Cornwall.
6.23 The figures in the above table show that there is currently a significant undersupply. It is also important to note that the five year supply figures used are taken directly from the 2013 SHLAA, which includes delivery on sites without planning permission (allocations and resolution to grant subject to S106). It is therefore possible that the five year supply is actually lower than that envisaged in the 2013 SHLAA.

6.24 Notwithstanding the above assessment, our findings are reinforced by the fact it has been established at an appeal recently that the Council is unable to demonstrate a five year supply (Land north of Upper Chapel, Launceston – Ref: APP/D0840/A/13/2209757).


6.25 The Development Brief (DB) was adopted by the Council (25 January 2012) for use as a material consideration in the determination of planning applications within the area north of the A390. The DB is therefore not a planning policy document and can therefore only be afforded limited weight.

6.26 The DB identifies that the wider area (which includes the application site) is envisaged to be developed for a range of uses including (not exclusively) the provision of 2,600 dwellings, circa 17,000 sq. m of employment floorspace, a stadium, hotels, retail, leisure and community facilities.
6.27 It is envisaged in the DB that there will be the creation of a District Centre, which will include:

- the provision of a medium sized foodstore as indicated by the GVA Retail Study 2010 (probably not less than 2,500 sqm net
- a Doctor’s Surgery/Health Centre
- a public house/restaurant
- a children’s nursery
- space with a parking area to accommodate a mobile library unit
- the provision for a range of small business and services to complement the above uses.

6.28 In addition to the above, the DB states that a new community hall is required to be provided on land within the proposed district centre, or on a suitably accessible position on a site within a local centre.

6.29 Additionally, the DB sets out a range of the main constraints, considerations and opportunities that are to be addressed by the proposals brought forward by prospective developers and which have been considered in developing the application proposals.

**Emerging Local Planning Policy – Cornwall Local Plan**

6.30 The emerging Cornwall Local Plan was issued for Proposed Submission consultation in March 2014. The Local Plan is not at an advanced stage of it preparation and most importantly has not been subject to Examination. The weight to be attached to the document is therefore limited at this stage, particularly the housing requirement which remains the subject of outstanding objections.
7. **Consideration of Key Matters**

7.1 This section of the statement provides an overview of the key matters associated with determining the acceptability of the proposed development.

**Principle**

7.2 The enabling case proposed by this development is fully justified and is a key material consideration to the acceptability of the proposed development. In this regard, the Opinion of Christopher Lockhart-Mummery QC provided and the Enabling Statement submitted provides further detail on this matter.

7.3 The level of in-commuting to Truro is the highest into any settlement in the wider South West region (according to figures contained in a Roger Tym & Partners report on the Functional Analysis of Settlements in the South West region – March 2005). It is therefore important that new homes are delivered at Truro and Threemilestone to provide a more sustainable balance between the location of jobs and homes.

7.4 The proposed development will be fully integrated into the wider development approved on the Langarth site (PA11/06124) to the immediate north. In this regard, the illustrative layout makes provision for direct connections, both vehicular and pedestrian, to the adjacent Langarth development. The proposed development of the site is in accordance with the principles set out in the Council’s DB and will enable the delivery of a dual centred district centre (when combined with the local centre included as part of the Langarth scheme).

7.5 Additionally, the Carrick Local Plan (1998) is significantly out of date and the emerging Cornwall Local Plan is not sufficiently advanced and resolved to be given significant weight in the determination of this outline planning application.
7.6 Notwithstanding this position, the proposed development is in general accordance with the spatial strategy and housing mix policies outlined in the emerging Local Plan, which focuses development at Truro and Threemilestone as well as encourage a mix of house types and sizes to be provided.

7.7 Furthermore, it is also the case that the Council is unable to demonstrate a five year supply of housing when the draft RSS housing figures for Cornwall are applied.

7.8 It is appropriate therefore to determine this planning application in the context of an enabling development as well as an absent, silent and out of date development plan. With regard to the second factor, it is therefore appropriate to apply the presumption in favour of sustainable development and specifically the 2nd bullet under the approach to decision taking outlined at paragraph 14 of the Framework.

7.9 In this regard, the remainder of this section of the statement demonstrates how there are no significant adverse effects associated with the proposed development or any policies contained in the Framework which indicate that planning permission should not be granted and development restricted.

7.10 Additionally, a Comparative Assessment looking at the competing applications will be submitted separately.

**Transport and Accessibility**

7.11 The NPPF sets out the Government’s overall aim of reducing the need to travel, especially by car, and promoting sustainable transport. This can be achieved in a number of ways but particularly by the careful location of development to ensure the easy facilitation of walking and cycling and use of public transport.
7.12 With particular regard to transport and accessibility it is recognised in the NPPF (at paragraph 29) that:

“The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel.”

and, that:

“....local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.”

7.13 The proposed development will be a sustainable and accessible development. The site is located approximately 1 km north west of the Langarth Park and Ride, 1.5 km to the north west of Threemilestone, 2 km west of Treliske and 6 km west of Truro city centre. A bus service operates along the A390 providing access to these locations.

7.14 The NPPF goes on to express (at paragraph 34) the importance of ensuring that developments that generate significant movement are located where the need to travel will be minimised.

7.15 The Transport Assessment concludes that is well located and will be linked to the proposed mixed use development at Langarth and to the local facilities at Threemilestone and Treliske. It has also been highlighted that appropriate provision for bus links can be secured.

7.16 It is considered that the residual impact upon the adjoining highway network would not be significant and therefore would comply with NPPF paragraph 32.

7.17 The access arrangements proposed (Drawing No. TPBR0048-H-051 Rev A) will provide a safe and acceptable means of access to the proposed development.

7.18 It is concluded that subject to the imposition of appropriate planning conditions and agreement being reached upon any necessary planning
obligations, there should be no technical or transport policy reason for withholding the grant of planning consent.

Retail

7.19 A standalone Retail Statement has been prepared to support the proposed retail provision.

7.20 The assessment has shown that the trade diversion associated with the proposals will have a minimal impact on the city centre, the majority of turnover being derived from supermarkets and out of centre stores. Importantly the statement shows that the city centre is currently over performing.

7.21 Whilst this capacity will be reduced if the committed development elsewhere in the Study Area is constructed, the growth in available expenditure means that there is still a need for additional retail floorspace in Truro. Additionally, it is clear that the turnover of the application proposals can be met solely through the growth in expenditure between 2014 and 2019.

7.22 The assessment undertaken is based on the application proposals meeting the Council’s long-held aspiration for the development of the Western District Centre. The proposed centre achieves this as an extension of the consented Langarth scheme and fulfils more of the Council’s requirements for the District Centre than any of the alternative sites.

7.23 The application proposals will divert some of the growth in available expenditure from the city centre, but even with the proposals it will increase its turnover compared to today.

7.24 Moreover, the Stadium for Cornwall enabled by the application proposals will generate additional income for the city centre, which will offset the identified diversion of expenditure related to the proposed floorspace.


7.25 It is noteworthy that the site is not subject to any national or county wide landscape designation and cannot be seen from the Cornwall Area of Outstanding Natural Beauty (AONB).

7.26 A Landscape and Visual Impact Appraisal (LVIA) (March 2014) has been undertaken as part of preparing the proposed scheme.

7.27 The assessment is informed through an understanding of the existing conditions at the site and its local context. The assessment has considered the potential effects of the development on:

- Individual landscape features and elements;
- Landscape character;
- Visual amenity and the people who view landscapes.

7.28 The findings of the work have established in terms of landscape impact that there is likely to be:

- At a national level, negligible (unnoticed with very limited consequences) effect on the national countryside character area, defined as the "Cornish Killas"
- At a local scale, a minor adverse impact (noticed but not important in decision-making) on the Redruth, Camborne and Gwennap landscape character area and the Fal Ria, Truro and Falmouth character area.
- Overall landscape effects, taking consideration of the maturing of proposed tree planting/landscaping (after 15 year period) is minor adverse impact (noticed but not important in decision-making)

7.29 With regard to visual impact, the following impacts have been found through the assessment:
• Users of the A390, a minor adverse (noticed but not important in
decision-making) impact (upon opening year/year 0) reducing to a
negligible (unnoticed with very limited consequences) impact once
landscaping tree planting has matured/at year 15;
• Users of the public right of way, a major/moderate adverse impact
(important effect in decision making/noticed but not important in
decision-making) reducing to moderate adverse (noticed but not
important in decision-making) at once landscaping tree planting has
matured/year 15.

7.30 The proposed development would not give rise to any effects that should
preclude it on landscape and visual grounds. Subsequent care and
attention to the detailed design of the development will however, be
important. In particular, careful regard to the rooflines, elevation
treatments and overall detailed design of the buildings would be required
to ensure that the potential adverse visual effects are further mitigated
and minimised. Similarly, careful attention will be required to the detailed
design and management of the landscape framework to maximise the long
term environmental benefits of this local resource.

7.31 Whilst there would be some adverse (negative) landscape and visual
effects at the outset (Year 0) on account of the permanent loss of the
fields and the change from agriculture to urban development, it is judged
that these adverse effects would be localised, being limited to the site and
the immediate local landscape around. Effects would reduce in the longer
term (Year 15 and beyond) on account of the maturing GI framework,
which would provide a net gain in habitats, such as tree cover, as well as
accessible green space for play and recreation. Also it is considered that
the site’s landscape character has the ability in which to absorb urban
development of the scale and type proposed without causing any
unacceptable landscape and visual harm.

7.32 In conclusion, it is has been demonstrated that the site’s landscape
character has the ability in which to absorb urban development of the
scale and type proposed without causing any unacceptable landscape and
visual harm. Pursuing the approach/mitigation to design at the detailed stage that is outlined in LVIA would mean that the development has a minimal landscape impact that responds appropriately to the key visual relationship the site has with the surrounding landscape and its features.

**Flood Risk and Drainage**

7.33 A Flood Risk Assessment (FRA) has been undertaken and the proposed development would neither be at risk of flooding nor increase the risk of the severity of flooding elsewhere.

7.34 With regard to flood risk, a review of the publically available Environment Agency Flood Data Map shows that the application site is within Flood Zone 1. No historic flood events have been identified or recorded on the Environment Agency Historic Flood Map within the vicinity of the proposed development site. The site is located along a ridge and unlikely to experience overland flow from adjacent areas. In conclusion the proposed development will not be subject to unacceptable flood risk and does not increase the risk of flooding elsewhere.

7.35 In respect of surface water disposal, the proposed development will incorporate Sustainable Drainage Systems into the surface water drainage strategy to control and treat surface water runoff at source. Infiltration rates recorded from insitu testing on adjacent land are favourable and surface water runoff will be controlled by a combination of porous paving and traditional ring soakaways for residential units. Residential infiltration systems will be designed to accommodate the 1 in 100 year plus 30% climate change rainfall event. The commercial development and highway infrastructure will drain via positive drainage to storage basins located at lower elevations along the northern boundary. The flow from the site will be restricted to that of the 1 in 1 year greenfield rate for the undeveloped site for all rainfall events up to the 1 in 100 year plus 30 % climate change. In conclusion surface water runoff, generated within the boundaries of the site, will be intercepted and stored within:
• below ground structures (soakaways) where it will be allowed to dissipate into the weathered Porthtowan formation and re-charge groundwater.
• above ground structures (linear basins) where outfalls will be restricted to the 1 in 1 year greenfield runoff rate for the undeveloped site.

7.36 In relation to foul water disposal, the site will incorporate a foul water pumping station constructed to adoptable standards and offered to South West Water for adoption through a Section 104 agreement.

Archaeology and Heritage

7.37 An Archaeological desk-based assessment has been prepared as part of the planning application submission. This report shows how the proposed development will have no direct or indirect impacts on the identified SAMs, WHS and designated built heritage assets.

7.38 This desk-based assessment has established that a grade II listed milestone NHL 1136637) of national significance is located in the south-eastern part of the study site. The proposed development would require the repositioning of this asset, which would require Listed Building Consent from the Local Planning Authority as part of the planning application. In order to minimise the impact on the significance of the milestone caused by its relocation, the milestone would need to be moved perpendicularly backwards as opposed to further along the road to preserve its mileage statement, and its current spatial arrangement would need to be re-established in the new location. The significance of the milestone strongly relates to its functional relationship with the road and development proposals relating to the milestone would need to maintain this relationship. However, the repositioning of the milestone should result in less than substantial harm to its significance.

7.39 No other designated heritage assets are present within the study site itself. A number of designated heritage assets are also recorded in the
wider proximity, these comprising the northern limits of the Cornwall and West Devon Mining Landscape WHS (Gwennap Mining District), the sites of two scheduled monuments (comprising three round barrows in total), a further listed milestone and a listed farmhouse. In consideration of the significance of these particular assets and their setting, this study concludes that proposed development would result in no more than a negligible degree of harm.

7.40 It has identified a moderate potential for the study site to contain buried archaeological remains of Prehistoric date relating both to evidence associated with record of a cropmark recorded within its southern area, but also in consideration of its position along the prominent Hightown Ridge, along which similarly dated activity is recorded. Current evidence would suggest that any activity, if present, is unlikely to be of significance such that it would preclude or significantly constrain the proposed development. Beyond this noted cropmark, a low potential is identified for the study site to contain any significant previously unrecorded buried remains dating to all other periods, as it appears to have remained in agricultural use throughout the medieval period, if not earlier.

7.41 This assessment has identified a moderate potential for remains likely to be of no more than regional importance to be present within the study site. However, these features should not preclude the proposed development from taking place provided suitable steps are taken to identify their extent, clarify their potential and inform a mitigation strategy for the study site. The nature of further work would need to be agreed through liaison and consultation with the Local Planning Archaeologist.

7.42 It is considered that the archaeological interest of the study site could be suitably preserved via a programme of archaeological mitigation works, which could be secured via condition.

7.43 In light of the limited potential identified for significant archaeological remains to be disturbed by proposed development, it is concluded in the
report that any further consideration of the archaeological interest of the study site could be suitably addressed via an appropriate planning condition.

**Ecology / Biodiversity – Conserving the Natural Environment**

7.44 An Ecological Appraisal has been prepared as part of the planning application submission.

7.45 Three internationally designated sites of nature conservation importance (Carrine Common SAC, Godrevy to St Agnes Head SAC and Fal and Helford SAC) are present within 10km of the site. A further, nationally designated site Carrick Heaths SSSI is located within 2km of the site and a single non-statutory site of nature conservation interest is located within 1km of the site.

7.46 The SACs are sufficiently isolated and not directly connected to the application site by footpaths, the proposed development is unlikely to result in any more than a minor rare increase in visitors to these sites. The relatively small size of the residential component of the remaining development, it is also considered unlikely that there would be any significant adverse effects resulting from an increase in visitors to these sites from these new residences.

7.47 With regard to habitats, generally, a large proportion of the survey area can be considered of low ecology and nature conservation value given the dominant habitat type is intensively managed arable land subject to the usual nitrogen, pesticide and herbicide applications common under modern agricultural practices. Of higher ecology and nature conservation value are the hedgerows (Cornish hedges) forming boundary features across the site and no doubt of greatest ecology and nature conservation value are the mosaic of habitats associated with Langarth Stream in the north of the site that have the potential to provide significant resources to a wide range of local wildlife.
7.48 Of the total site (17.64Ha), a significant proportion is proposed as informal open space and green infrastructure provision with the majority of indigenous site boundary hedgerow features being retained and buffered by newly created habitats within the proposed green infrastructure of the project. Additional indigenous woody species planting is also proposed to the north of the food store service yards and on the western site boundary that will enhance the native hedgerows and compensate for the total loss of hedgerow, and partial loss of other hedgerows on site.

7.49 The Langarth Stream corridor will be widened through the provision of buffer habitats and augmented by the creation of sustainable drainage features that will provide further long term biodiversity interest whilst significantly increasing the amount of aquatic and riparian habitats within the site.

7.50 The majority of semi mature trees will be retained within development proposals as most are located within those linear boundary features that are being retained or within areas of proposed informal open space where the biodiversity interest will be augmented by appropriate long term management and enhanced through the creation of new adjacent habitats.

7.51 General prescriptive enhancement measures are recommended for implementation in relevant/appropriate areas throughout the landscape proposals to enhance and maximise the biodiversity gains delivered by the proposed development.

7.52 With regard to flora, two species of notable plant were recorded from within the site, namely wavy St John’s wort and balm-leaved figwort. The St John’s wort will not be significantly affected by the proposed development. Several plants of balm-leaved figwort were noted along the southern hedgerow, where the hedgerow was most ‘scrubby’ and canopy was gappy. The main access into the proposed site will not have any
significant effect on populations of this plant, the location of the proposed junction arrangement being agreed.

7.53 In addition to these two plant species, the WCA Schedule 9 invasive Japanese knotweed was recorded along the southern hedgerow. Japanese Knotweed causes a variety of problems which can be divided into nature conservation, recreation and landscape, flood defence, and the built environment. A full strategy for the control of Japanese knotweed will be required prior to the commencement of construction of the proposed development on this site.

7.54 The following bullets deal with fauna considerations:

- **Reptiles** - suitable habitat has been identified within the survey area (the majority of which is in the north of the site) and peak counts suggestive of 'low' populations of grass snake have been recorded following presence/absence surveys conducted in 2014. To comply with legislation and to ensure that the favourable status of reptile populations will be maintained, a range of mitigation measures are proposed to be implemented. Additional enhancement may be achieved within the operational phase of the development if practicable.

- **Bats** - an Interim Bat Survey Report has been prepared (and submitted) which shows that habitats within the site are used by a moderate but unremarkable number of bats. The vast majority of bat activity recorded to date is from the Langarth Stream corridor that forms a belt across the northern extent of the site and indicate the corridor is significant for both foraging and navigation (commuting between roosts and foraging ground). The Langarth Stream corridor and the majority of the site boundary features will be retained in their entirety and protected from the potential effects through strengthening and enhancement by additional native woody species planting and gapping-up of the existing feature canopy. There are the exceptions to this and there will be the loss of sections of some hedgerows. The site is currently subject to low
levels of artificial light spill from the A390 to the south. It is considered unlikely that moderate increases in lighting levels associated with any proposed mixed residential / commercial development will have an adverse effect upon local populations of common bat species. Low level/intensity lighting is recommended along the whole of the Langarth Stream corridor and associated green infrastructure on this northern edge of the proposed development to provide a dark corridor for commuting lesser horseshoes. No bat roosts have been confirmed following a roost inspection and structural assessment of agricultural buildings present on the West Langarth site.

- **Badgers** - are not considered a constraint to the proposed development at West Langarth however, given known and active badger populations are present on adjacent land within the wider local area it is suggested that the site be resurveyed prior to commencement of construction to ensure that baseline conditions remain the same, and that precautionary measures are adopted during the construction phase, during which, all holes, trenches and ditches will be covered at night or where not practicable a means of escape will be installed to allow badgers or other mammals to exit. This will avoid unnecessary injury and reduce the potential for fatality.

- **Birds** - Generic mitigation measures to reduce the potential effect of development proposals upon common and widespread species of breeding birds are suggested, however further mitigation measures will be provided within the full breeding bird survey report that will be provided as supplementary information within the determination period for this application. **Wood Lark** surveys have not been completed for this particular site given that the survey period for breeding wood lark begins in February and appropriate methodology requires three evenly spaced surveys between February and June; furthermore the recommended methodology for wintering wood lark surveys requires one monthly visit between November and February. Survey work has previously been undertaken by Cornwall Environmental Consultants (CEC) in
relation to the adjacent Langarth Farm scheme and information about local breeding and wintering sites has been made available. In addition to this, further dedicated survey work with respect to mitigating the potential effects of the wider Langarth scheme is proposed as a condition of the respective planning permission and will provide further information on the status of local populations of this species.

- **Otter** - The Langarth Stream corridor is to be retained in its entirety and buffered from the potential effects of the proposed development by creation of additional habitats. In particular, the creation of new SUDS adjacent to the existing Langarth Stream corridor will significantly increase the riparian habitats available within the site and ensure continued habitat suitability is maintained for the species. Although access to the greenspace in the north of the proposed development is to be informal, the design of this area will be such that access to Langarth Stream itself and the immediately adjacent riparian habitats will be restricted to further reduce the potential for disturbance.

7.55 In summery the Ecological work undertaken to inform the planning application has demonstrated that there are no ecological constraints or adverse impacts that would prevent the development from proceeding.

**Air Quality**

7.56 An Air Quality Assessment has been prepared in support of the proposals as the proposed development has the potential to generate dust and other emissions.

7.57 The assessment undertaken has considered the suitability of the site for the Proposed Development with respect to existing air quality, existing planning policies and national legislation. Additional mitigation measures have been recommended where appropriate, to minimise the potential for adverse residual effects to be experienced by sensitive receptors (e.g. residential properties).
7.58 The nearest Air Quality Management Area (AQMA) to the proposed development is located 5.8 kilometres to the south west, known as Kerrier AQMA, which was declared by Cornwall Council for exceedences of the annual mean NO\textsubscript{2} objective in 2005.

7.59 A model has been used to quantify the change in pollutant concentrations at receptors along the A390 from west of the proposed development entrance to the County Hall in Highertown for the baseline year of 2012 and the future assessment year of 2031, with and without the development, accounting for committed developments. Annual mean pollutant concentrations were also predicted at five proposed receptors on the proposed development site. Annual mean pollutant concentrations were predicted at seven cumulative schemes near to the proposed development.

7.60 The assessment undertaken had mitigation measures embedded as these are considered standard approaches to controlling and managing dust and air quality impacts. In terms of the construction impacts, the preparation and implementation of Construction Environmental Management Plan which included a range of dust and air quality specific mitigation was embedded/is proposed.

7.61 The assessment undertaken has established that with standard approaches to mitigation the proposed development will have no noticeable adverse impacts.

7.62 In conclusion, the overall impact of the mixed use development would be negligible on surrounding properties. As annual mean concentrations of all pollutants are predicted to be well below or below relevant objectives at proposed receptor locations, the site is considered suitable for mixed development use.
7.63 In light of the above findings the proposed development complies with air quality related policies and there is no reason in this regard why the planning application should be refused.

**Noise**

7.64 Noise Assessment work has undertaken in support of the application proposals as the proposed development have the potential to create noise and vibration impacts within the immediate vicinity of the site.

7.65 The assessment looks at potential noise and vibration impacts associated with the proposed development. Specifically the impacts of the proposed development during the construction (including demolition) and completed development stages has been covered. In particular, it considers potential impacts on identified receptors in terms of:

- Predicted noise levels from demolition and construction;
- Noise from building services plant and operation of the completed development; and
- Any increases to road traffic attributed to the Proposed Development

7.66 The work undertaken also provides an assessment of the suitability of the site for the proposed uses, in terms of existing noise and vibration, and the need to provide an adequate internal and external noise environment.

7.67 Potential existing sensitive receptors in proximity to the Site which have been taken into consideration when assessing the impacts associated with noise and vibration levels (from the construction and operational phases) of the proposed development include:

- Hawthorn Cottage and Penmore
- Croftside and The Ramblers
- West Langarth Farm
- Trevone
- Little Trenoweth
- Little Regarded Farm

7.68 The preferred approach for controlling construction noise and vibration is to reduce levels at source where possible, but with due regard to practicality. Sometimes a greater noise level may be acceptable if the overall demolition/construction time, and therefore length of disruption, is reduced. Noise and vibration will be managed to reduce effects, and mitigation measures will be documented via a Construction Environmental Management Plan (CEMP). On-Site, good practice procedure will be followed in order to mitigate noise and vibration effects.

7.69 The impacts (including any proposed mitigation) of the proposed development are assessed as being negligible and the proposed development will be create an acceptable environment for existing and prospective residents and users.

7.70 It is clear from the finding of noise report that relevant policies are complied with and there is no reason in this regard why planning permission for the development should not be granted.

**Ground conditions and contaminated land**

7.71 A Phase 1 Desk Study has been carried out to support the planning application and to identify potential ground related issues that may influence the proposed development of the site. This includes a review of historic mapping, environmental records and records on the ground conditions. This has been undertaken in accordance with paragraph 121 of the Framework which requires “adequate site investigation information, prepared by a competent person”.

7.72 A review of historical maps indicates that the majority of the site has remained undeveloped since 1879 and currently consists of agricultural land. However, a small portion of the southern part of the site has been developed as the A390 road, aligned-south-east to north-west. The
surrounding area has remained largely undeveloped since 1879, with the exception of a number of residential properties and buildings associated to the immediate south-west of the site. The 1879 map identifies a number of shafts located 200m to the west of the site and 300m to the north until 1908 when they are shown as old shafts.

7.73 The underlying mapped geology is anticipated to consist of interbedded slaty mudstone and sandstone of the Porthtowan Formation. Alluvium is shown on the northern boundary of the site associated with a tributary of the River Kenwyn. A previous investigation undertaken by CGL in July 2010 on the adjacent site, identified as ‘Langarth’ supports this as the ground encountered comprised topsoil overlying the weathered Porthtowan Formation to depth.

7.74 Based on the anticipated ground conditions elevated concentrations of naturally occurring metals and sulfates levels may be encountered. The Alluvium located in the north of the site maybe a source of soil borne gases, although any risks from ground gas should be mitigated by the full radon protection measures required. Offsite sources of contamination include the mine shafts located to the north-west of the site adjacent to the source (spring) of a tributary of the River Kenwyn which flows from west to east.

7.75 The results of the Phase 1 assessment indicate that the site is generally suitable for its proposed commercial and residential end-use from a geoenvironmental perspective. The site is located in a radon affected area, as between 10 % and 30 % of properties are above the action level, therefore full radon protection measures are required.

7.76 A detailed ground investigation should be undertaken at the site for geotechnical design purposes. As part of this investigation, it is recommended that soil, soil gas and groundwater are sampled to confirm the geoenvironmental preliminary risk assessment. In particular, this should include ground gas monitoring in accordance with CIRIA C6651. It is noted that CIRIA C665 recommends that for a site of high sensitivity
(residential with gardens) and very low source potential (alluvium in the north of the site) that a minimum of six visits are undertaken over a period of three months for the gas risk assessment.

7.77 Provided the above additional work and recommendations are implemented there are nothing that would preclude development and would result in any adverse impacts.

**Arboriculture**

7.78 An Arboricultural Impact Assessment has been prepared as part of the planning application.

7.79 It reports that illustrative masterplan shows a well organised addition to the urban extension including significant allocation of public open space. There is extensive opportunity on the site to improve the overall tree cover of the area with a robust new tree planting scheme.

7.80 The arboricultural impact of the proposed development is considered to be low/moderate with a net gain in the long term following new site landscape planting.

7.81 It is recommended that subsequent detailed or reserved matters planning applications should supply further arboricultural information detailing the following:

- An arboricultural impact assessment based on the final detailed layout.
- A tree mitigation strategy including:
  - A Tree Protection Plan (TPP) showing the location of the tree(s), the proposed development and the measures recommended to ensure physical protection throughout the construction process.
  - Arboricultural Method Statements (included on the TPP) describing how the trees on site will be managed throughout the construction stages (existing and new trees).
• A Vegetation Management Plan for the green space and woodland areas of the site.

7.82 It has been demonstrated that there is no significant adverse impacts on arboriculture as part of the proposed development and that there is an opportunity to improve overall tree cover and quality as part of the associated landscaping/tree planting. The proposed development is therefore acceptable in terms of arboricultural matters and the above recommendations should be incorporated as appropriate within conditions attached to any grant of planning permission.
8. Conclusion

8.1 This statement has been prepared as part of an outline planning application for the mixed use development of land north of the A380 referred to as West Langarth.

8.2 The application proposals are brought forward as enabling development for the Stadium for Cornwall and will form an extension to the wider consented Langarth mixed use scheme, which is on land directly adjacent to the east of the application site.

8.3 The application proposals therefore provide an opportunity to realise the ambition for a Stadium for Cornwall to be realised alongside the associated the social and economic benefits that are readily apparent.

8.4 Whilst the emerging plan is at an early stage and can be given very limited weight, the application proposals are in accordance with the spatial distribution of development proposed in the emerging Local Plan, which directs development to (inter alia) Truro and Treemilestone.

8.5 It is important to note that the development plan (Carrick Local Plan 1998) is out of date by reason of it age and the fact that the Council is unable to demonstrate a five year supply of housing in accordance with the Framework. The emerging local plan is also not significantly advanced (pre-Examination) to be given significant weight. In this scenario, the Framework advises that the presumption in favour of sustainable development is applicable and that:

"planning permission should granted unless there are adverse impacts that would significantly or demonstrably outweigh the benefits, when assessed against the policies in this Framework as a whole."

8.6 This statement and other documentation submitted as part of the outline planning application have demonstrated and illustrated how the mixed use development can be provided at the application site in an acceptable
manner that will not result in any significant adverse impacts and does not conflict with the policies contained in the Framework.