
Appendix C Extract From Cornwall Panel Report

Chapter 3 Plymouth Sub-Region

Policy 24 - South East Cornwall

Policy treatment of the Plymouth Sub-Region and the principal urban area

3.1 The plan carries forward the recommendations of the *Plymouth Sub-Regional Study*, in so far as they apply to Cornwall, by means of Policy 24. However, there is no clear definition of the terms “South East Cornwall” and “Plymouth Sub-Region”. It appears that the two are synonymous and the area is shown, as one, on the key diagram. It was confirmed at the examination¹ that the sub-region equates with the 1991 Plymouth travel-to-work area and is the Cornish part of the sub-regional study area. It includes Callington.

3.2 Policy 24 also refers to the Plymouth principal urban area. There are those who object to the term on the basis that it suggests a take over of a part of Cornwall by Plymouth. Nothing could be further from the truth. The term derives from RPG10² and it refers to the undeniable fact that this area already relates very closely to Plymouth for employment and major shopping. Plymouth is but one of eleven such areas in the south west region which are seen as offering the best opportunity for accommodating the majority of development in the most sustainable way; primarily within the defined principal urban area³. It is an objective of sub-regional policy that major employment, social and cultural investment should be focused at Plymouth⁴. The structure plan should also define the general geographical extent of the principal urban area and provide an indicative target for the number of dwellings and other developments to be located in that area.

3.3 We agree with the Government Office⁵ that the application of Policy 24 to the broader sub-region does not reflect adequately the policy imperative of RPG10 to focus development on the principal urban area. Although the allocation of 4000 dwellings in the plan period is directly linked to the development of Broadmoor Farm as a major strategic employment site the policy states that it is

¹ Mr T Horwood on behalf of Cornwall County Council, discussion on matter PSR3.

² *Regional Planning Guidance for the South West (RPG10)*, DTLR September 2001.

³ *RPG10*, Policy SS2.

⁴ *RPG10*, Policy SS3.

⁵ The Government Office for the South West.

the sub-region which is the focus of housing development in Caradon District. To accord fully with RPG10 the focus should be narrower. For example, the Caradon District Local Plan review⁶, provides for 1000 dwellings (of the 4000 for south east Cornwall) in Callington⁷. Although this accords with the 1997 structure plan it runs counter to the last bullet point in RPG10 Policy SS2 because of the ease of commuting from Callington to Plymouth. There is also no indication that it would be “phased in relation to employment growth at Saltash” as required by the last part of Policy 24. We discuss this further in chapter 4.

3.4 We consider that, to accord with RPG10, Policy 24 should focus development within the principal urban area in the first instance. It should quantify the housing provision (and other development) to be made within the principal urban area. There is no need in policy terms for the policy to cover the broader sub-region. This would also help to clarify the policy role of Callington, which would be subject to Policy 25.

The definition and delineation of principal urban areas

3.5 A fundamental policy of RPG10 is that growth should be concentrated at the principal urban areas⁸. This policy is developed so as to require that development should take place primarily within such areas, but where this is not possible, development should be in the form of planned urban extensions in sustainable locations⁹. Structure plans are given the role of defining “the general geographic extent of each in the same way that the general extent of green belt is set out”¹⁰. In Cornwall, only the Plymouth principal urban area is described as extending into the county.

3.6 Just what constitutes a principal urban area is not clear from RPG10, but some idea of the intention behind the concept may be derived from the report of the panel which conducted its public examination in March 2000. Here¹¹, after discussing some contrasting ideas on extent and definition, the panel settled for defining a principal urban area as “the continuously built up area”.

3.7 On this basis, it is clear to us that the definition of a principal urban area is essentially a matter of survey, and not the deliberate identification of a policy in spatial terms. However, the matter is complicated by two factors. The first is the concept of “urban capacity” which derives from PPG3¹² but then in *Tapping the*

⁶ As placed on first deposit in June 2003.

⁷ Mr G Roughton on behalf of Caradon District Council, discussion on matter PSR4.

⁸ Policy VIS1 at paragraph 2.6.

⁹ Policy SS2 at paragraph 3.3.

¹⁰ Policy SS5 at paragraph 24.

¹¹ At paragraph 4.55.

¹² PPG3, paragraph 24.

Potential” expands on this advice to include “vacant land not previously developed”¹³; a category not to be found in PPG3 except by way of exclusion from its definition of “previously developed land”¹⁴. On this basis, the continuously built up area is likely to include previously undeveloped sites (some manifestly “greenfield”) within the general limits of the built up area. The second complication is that the defined limits of a principal urban area have commonly come to be seen as an area of policy definition, in which proposed developments within the boundary in some way attract greater likelihood of success than those without.

3.8 Nevertheless, for all its troublesome character, we recognise that the definition of principal urban areas is a requirement of regional planning guidance. Having considered a number of ways that the definition could be expressed cartographically, we consider that, at the strategic level, the smaller the scale and the greater degree of generalisation the better. For this reason, we are of the opinion that the style in which the Plymouth principal urban area is expressed in the key diagram of the Cornwall Structure Plan is the best. The supporting text should be amended to make it clear that the delineation of the principal urban area has no intrinsic policy significance.

We recommend that:

R3.1 The supporting text to Policy 24 be amended to make clear that the delineation of the Plymouth principal urban area in the key diagram has no intrinsic policy significance.

Should Torpoint be included in the Plymouth principal urban area?

3.9 Despite the generalised depiction of the principal urban area on the key diagram there is clearly a dividing line between Saltash and Torpoint. This follows the advice in the *Sub-Regional Study*¹⁵ which recognises the strong functional link between Torpoint and Plymouth but concludes that the limited transport (ferry) link renders it “inappropriate” for the town to be regarded as an “integral part” of the principal urban area. This appears to confuse the “survey” and “policy” approaches discussed above. Apart from the fact that the ferry link is programmed to be improved, we consider that the potential for further development should not influence the identification of the principal urban area. This applies equally to the position of Saltash in relation to the Broadmoor Farm proposals, as discussed below.

¹³ “*Tapping the Potential*” - *Assessing urban housing capacity: toward better practice*”, London DTLR December 2000; p.10, Figure 1 and p.16.

¹⁴ PPG3, Appendix C.

¹⁵ *Sub-Regional Study*, paragraph 2.5.

3.10 Evidence¹⁶ on the ratio of jobs to economically active population indicates that Torpoint is even more heavily reliant on jobs outside the town than Saltash. We find it difficult to distinguish between the two towns in functional terms and recommend that the boundary of the Plymouth principal urban area should be re-drawn to encompass both towns.

We recommend that:

R3.2 The key diagram be amended to include Torpoint within the Plymouth principal urban area.

The Broadmoor Farm major strategic employment site

3.11 Policy 24 identifies Broadmoor Farm, near Saltash, as a major strategic employment site. It is shown on the key diagram as lying just outside the boundary of the Plymouth principal urban area. This is the correct approach because the site lies within an area of countryside which is clearly beyond the existing built-up area. Although there is some commercial and industrial development (including a service area, travel lodge, and superstore) north of the A38, the trunk road marks the limits of development at Saltash¹⁷.

3.12 RPG10 Policy EC4, proposes that a range of major strategic sites should be identified in the region to meet the needs of major business users and sets criteria for their selection. The sites are proposed as being a minimum size of 12 hectares and preferably over 50 hectares. RPG10 requires such sites to be identified in the structure plan “which will need to set out clearly why these are sustainable locations”.

3.13 The site is provided for in both the approved structure plan¹⁸ and the Caradon District Local Plan Review¹⁹ as a “safeguarded area”²⁰ for a “prestige business development” for “a maximum of two large users requiring a high quality setting”. Its inception thus pre-dates the current version of RPG10 and the emphasis now given to the requirements of sustainable development. We consider it crucial that the sustainability of the proposal should be critically examined.

3.14 In our view the plan is unpersuasive as to Broadmoor Farm being a sustainable location. The only reference is the sentence at the end of paragraph 113 which states that the site “can help achieve a better balance overall between

¹⁶ Cornwall County Council, Briefing Paper No. 2, table under paragraph 10.4.

¹⁷ See *Plymouth Sustainable Growth Study*, airphoto map 02.

¹⁸ Policy E5.

¹⁹ As placed on first deposit in June 2003.

²⁰ The Caradon Local Plan safeguards a total of 160ha of which 60ha are envisaged for development.

jobs and housing and help to re-distribute employment prospects in the sub-region to the West of the Tamar”. This closely reflects the conclusions of the *Sub-Regional Study*.

3.15 Broadmoor Farm is but one of three major strategic employment sites located in or on the edge of the Plymouth principal urban area, the others being at the Plymouth International Business Park and at Langage. We heard at the joint session of the examination²¹ that the latter has potential for further expansion and it is very well located in relation to the principal urban area and proposed urban extension. On the other hand, Broadmoor Farm is poorly related to Plymouth in terms of transport provision. There is no dispute that a development on the scale envisaged would be a major traffic generator, even more so if it was to be by way of smaller units than envisaged in the approved plan. Despite the proposal to provide a park-and-ride facility we agree with the Government Office that the proposal would be most unlikely to fulfil the objectives set out in paragraph 20 of PPG13 to optimise public transport use. This would be critical in view of the acknowledged capacity constraints on the Tamar Bridge and the lack of any programmed resolution of the problem.

3.16 We acknowledge that there is a major commuter flow from south east Cornwall into Plymouth and that the provision of a major employment opportunity at Broadmoor Farm would, theoretically, reduce the need to travel. But would it actually do so? No one can be certain as to what the actual employment, and travel patterns, would be. There would inevitably be a flow of employees from Plymouth to new units on the site and the potential for jobs on the site to be filled by people who would otherwise commute from Cornwall into Plymouth would be an incidental, not primary benefit. This leads us to the view that the first priority should be to meet the employment needs of Plymouth in the most sustainable way. In that context this site does not compare favourably in sustainability terms with those in Devon, a view reluctantly accepted at the examination by the Regional Assembly²² although there was an element of support from the Devon authorities on the basis largely of geographical and numerical balance. Overall we conclude that the site does not meet the locational criteria in RPG10 for the provision of such a major site.

3.17 Moreover, we understand there to have been very little interest in the development of this site since it was first identified. Most significantly, there is now no realistic prospect of a major inward investment scheme²³ of the kind that RPG10 Policy EC4 envisages and for which the adopted development plan “safeguards” this site. The Regional Development Agency would now expect a smaller scale development but infrastructural costs would be very high and they do not see any realistic prospect of the site being brought forward without RDA

²¹ Mr R Chaplin of DPDS on behalf of Taylor Woodrow Strategic Developments Ltd.

²² Mr K Woodhead on behalf of the South West Regional Assembly.

²³ Mr A Wood on behalf of the South West Regional Development Agency.

funding, despite the EU Objective 1 status of Cornwall. They favour Langage, at least in the short to medium term.

3.18 It is clear that the area is unsuitable for consideration as a major urban extension of the Plymouth principal urban area in the terms of RPG Policy SS5. The option was evaluated and dismissed in the *Sub-Regional Study*. The alternative²⁴ of a smaller scale, phased, mixed use development with a “pump-prime” of 5ha of land for housing is far removed from the original concept of a balanced and sustainable development. There may be some justification for additional employment provision in Saltash to meet local requirements but that is not a strategic issue. It would still be necessary to ensure that alternative sites could not be found within the built-up area and on brown field sites, as a priority. A small residential development would not relate at all well to the existing pattern of development and would not achieve the improvements in public transport accessibility required.

3.19 In short, there is no justification in strategic terms for a smaller phased development at Broadmoor Farm. It is an “all or nothing” situation and there is no realistic prospect of any form of major publicly funded infrastructure provision in order to bring the major site forward in the plan period. Apart from that, the site is less sustainable than others on the edge of the Plymouth principal urban area which can meet the needs of the area during the plan period. We recommend deletion of the proposal from the plan for these reasons.

What is left of Policy 24?

3.20 Policy 24 in the plan before us was to secure that a balanced residential development takes place in south east Cornwall that would be directly related to the Broadmoor Farm employment development proposal. Without that there is no basis for the allocation of 4000 dwellings in the area.

3.21 The format of the structure plan is that there is a policy for each strategic urban centre. It would be illogical not to have a policy at all for that part of the county that lies within the Plymouth principal urban area, but it must inevitably have a very different form. All it can do is to reflect the priorities in RPG10 for the principal urban area and to state the number of new homes in the plan period.

3.22 It must be the case that at least an element of the 4000 dwelling provision is to cater for housing needs within the principal urban area. Cornwall County Council, the Devon Joint Structure Plan Authorities and the Government Office all observed at the examination²⁵ that it is impossible to state what this element should be although it might be calculated. 1500 are committed in Saltash²⁶,

²⁴ As advocated by Persimmon Homes, position statement matter PSR3.

²⁵ Discussion on PSR4.

²⁶ Mr G Roughton on behalf of Caradon District Council.

which, we agree, is unlikely to accommodate any more. We consider, albeit without detailed evidence, that a further 1000 dwellings would be a reasonable estimate of the provision which should be regarded as “belonging” to the Plymouth area. What this means in practice is that the distribution of dwelling provision between Cornwall and Devon will need to be adjusted by that amount. The remaining 1500 dwellings should be re-distributed within Cornwall. We discuss this in paragraphs 4.20-4.24.

3.23 We were told by the County Council at the examination²⁷ that the proposal for a park and ride facility in the vicinity of Broadmoor Farm, as provided for in Policy 24, is a free-standing proposal which does not depend upon the implementation of any employment proposals. There is, therefore, no reason to delete the proposal from the policy as it has merit in helping to relieve congestion on the Tamar crossing. We suggest the omission of any reference to Broadmoor Farm to avoid confusion.

We recommend that:

R3.3 Policy 24 be replaced by a new policy along the following lines:

“Development in south east Cornwall should focus on the Plymouth principal urban area, which includes the towns of Saltash and Torpoint. The Caradon Local Plan should provide for the construction of 1500 houses here during the plan period, 2001-2016.”

“Employment provision should be for local needs only. Park and ride facilities will be provided in the vicinity of the A38/A388 junction. The enhancement of local facilities and services is a priority.”

²⁷ Mr T Horwood on behalf of Cornwall County Council.

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