

Truro and Kenwyn Neighbourhood Plan



Evidence summary

May 2022

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1.0 Introduction

The Truro and Kenwyn Neighbourhood Plan has been developed through a process of discussion with our communities and a variety of other people from infrastructure providers, to developers and Cornwall Council.

The guidance for Neighbourhood Plans sets out that there is no ‘tick box’ list of evidence required for neighbourhood planning. Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan. In each case the policies of the NDP and the revision set out the intention and rationale for the policies, but other key pieces of evidence are also set out in this document.

Neighbourhood plans are not obliged to contain policies addressing all types of development. Where neighbourhood planning bodies have decided to make provision for housing in their plan, the housing requirement figure and its origin are expected to be set out in the neighbourhood plan as a basis for their housing policies and any allocations that they wish to make.

The Neighbourhood Plan review also draws on policies that have already been tested at the Examination of the original Truro and Kenwyn Neighbourhood Plan, which was Examined and Adopted in 2016. In some cases and where our new revised policies add to or alter the existing policies additional information and evidence has been collected and is set out in this document.

1.1 Monitoring and delivery

The TKNDP will be used by the planning authority, Cornwall Council, as part of its Development Plan, having the same legal planning status as other planning documents. The issues of delivery and monitoring will inevitably evolve as the Neighbourhood Planning process develops.

At this stage however, it is assumed that:

- Cornwall Council will be responsible for monitoring the more ‘strategic’ matters in the Plan (such as delivery of housing numbers).
- Cornwall Council will also utilise the policies to make decisions and therefore proposals should be compliant with the policies at decision making stage.
- Truro City and Kenwyn Councils will be responsible for coordinating initiatives such as the proposed Green Infrastructure with partners. They will also play a key role in the efficient provision and use of land; for instance open spaces.

2. Evidence base

The updated Neighbourhood Plan for Truro and Kenwyn seeks to ensure that the plan is ready for future challenges. The revision was driven by a need to plan for significant new developments and a range of issues that were identified as key areas of challenge for the plan.

This has resulted in six topic areas that cut across all policies of the plan. The topics are:

- Responding to the challenges of climate change;
- Environmental growth and green infrastructure;
- Nurturing our economy;
- Health and wellbeing;
- Providing decent homes and meeting future infrastructure needs for all;
- Encouraging more sustainable travel patterns and choices; and
- Supporting our heritage and culture.

The following sections show the topic based summaries of evidence for each topic area that have informed the review of the Neighbourhood Plan policies

2.1 Responding to climate change

The Plan seeks to strengthen Truro and Kenwyn as places that respond pro-actively to the challenges of climate change and growth. Truro has always been an area of flood risk and the frequency of flooding could increase in the future unless action is taken to reduce the amount of water running off from our urban areas. The TKNDP has considered the emerging Climate Emergency Development Plan Document:

www.cornwall.gov.uk/climateemergencydpd and the implications that this has for the TKNDP plan area and the context that it provides for the plan (albeit the document is not yet adopted and therefore general conformity with it cannot be tested by the Examiner for the NDP).

The TKNDP revision includes the addition of new requirements over those of Policy E4 in the extant TKNDP and adds policy E4b. The policy revisions recognise that the NDP cannot set its own energy efficiency standards and relies on the development of the Climate Emergency DPD (CEDPD) in respect of this. In developing this policy, consideration has been given to the evidence and practise collected in the Cornwall Design Guide

www.cornwall.gov.uk/designguide and the CEDPD to understand practical measures that the policy could promote for the layout and form of development to encourage more energy efficient development. It also draws on advice in publications such as Building for a Healthy Life [14JULY20 BFL 2020 Brochure_3.pdf \(udg.org.uk\)](http://14JULY20 BFL 2020 Brochure_3.pdf (udg.org.uk)) and Building with Nature www.buildingwithnature.org.uk

2.2 Environmental Growth and Green Infrastructure

The Plan recognises the value of our natural environment and its contribution to the attractiveness and distinctive local character of the plan area. Whilst both Kenwyn and Truro have some outstanding green infrastructure, little is present in our built-up areas and the planting of more trees and the creation and improvement of green infrastructure will promote biodiversity for the benefit of people and wildlife. Recognising that Truro and Threemilestone will continue to be the focus for growth into the future, the plan positively seeks to safeguard and increase our environmental assets.

The revision of the TKNDP has taken into account the increased pressure on the GI assets both during and after the covid-19 pandemic has increased the importance of access to green spaces, both planned and natural. A survey was undertaken in key green spaces to understand the importance of them to our communities and a summary of the results is available on request. Whilst this has not led to the designation of new green spaces or additional Local Designated Green Spaces, it has helped to inform the preparations for a new Green Infrastructure Strategy for the plan area. Allocations at Pydar Street and Langarth also include policy criteria requiring the provision of green space/open space for allocations linked to opportunities identified through the masterplanning process and existing pen space standards in the TKNDP.

Green Infrastructure Strategy: The Green Infrastructure Strategy was developed in support of the first adopted TKNDP and provides a high-level understanding of the key elements of the strategic GI networks in the plan area. This non-statutory work is in the process of being updated to support the implementation of the revised TKNDP and to reflect the increase in recognition of value that the green infrastructure of the plan area has experienced over the pandemic period. The original strategy may be accessed at: www.trurokenwynplan.org and the revised strategy, which will support the policy, will be published during 2022.

2.3 European Sites: Since the development of the first TKNDP Cornwall Council has agreed an approach to ensure that development that would have a Likely Significant Effect on the European Designated sites of Penhale Dunes SAC and the Fal and Helford SAC. All applications for relevant development (including new dwellings and holiday accommodation within the Zone of Influence must provide Appropriate Assessment and mitigation against recreational pressure. This evidence may be accessed at:
<https://www.cornwall.gov.uk/planning-and-building-control/planning-policy/adopted-plans/european-sites-mitigation-spd>

This process was also used in the Appropriate Assessment of the TKNDP review.

The HRA considered impact pathways of: recreational pressure, water quality and resources and air pollution.

It concluded that the Truro and Kenwyn Neighbourhood Plan will not affect the integrity of European sites in relation to recreational pressure due to the overarching provisions of Policy 22 within the Cornwall Local Plan and the Supplementary Planning Documents (SPD) for terrestrial, marine and estuarine sites. Policy 22 states all new residential, student and

tourist accommodation will need to comply with a suite of monitoring and mitigation measures which are described within the SPDs for terrestrial, marine and estuarine sites.

It was recommended that text be added into the Truro and Kenwyn Neighbourhood Plan that includes reference to the overarching Local Plan Policy 22 and the SPDs for terrestrial, marine and estuarine sites.

It was also recommended that the following text be inserted into Policy E1 (Sustainable Development) or another appropriate policy to reinforce compliance with the Cornwall Local Plan:

- *'All residential development will need to be compliant with the Cornwall Local Plan's European Site Mitigation Supplementary Planning Document (SPD) for terrestrial, marine and estuarine sites. Development which would cause significant adverse effect on any European site will not be permitted, unless it can be demonstrated that Imperative Reasons of Overriding Public Interest (IROPI) and No Reasonable Alternatives exist, and adequate compensation measures to protect the National Site Network can be delivered.'*

It was also recommended that the following be inserted to Policy EJ3: *'Any development brought forward within the Port of Truro development area will require a project specific Habitats Regulations Assessment to ensure no significant adverse effects upon the integrity of the SAC. Development which would cause a significant effect on the Fal and Helford Special Area of Conservation will not be permitted.'* These policy recommendations have now been included in the Neighbourhood Plan, ensuring that there will be no adverse effects on European sites regarding recreational pressure.

It should be noted that this HRA doesn't just cover the housing in the Langarth allocation (Policy H3) up to the end of the plan period, but also all houses to be completed post the plan period. Any housing delivered post-plan period would not significantly alter the conclusions of this HRA with regards to recreational pressure upon Penhale Dunes SAC and Fal and Helford SAC. This is because the SPD for terrestrial, marine and estuarine sites can be extended to cover the additional beyond-plan-period housing, by placing SAMM tariffs on any dwellings within the core recreational pressure catchments of these SACs. Cornwall Council have confirmed that the amount of development proposed for the Neighbourhood Plan (to 2030) is allowed for in the scope of the strategic solution. However, the Council will need to keep the delivery of housing under review, and address needs and associated mitigation for impacts on the SAC at Local Plan review.

With regards to water quality and resources, the Cornwall Local Plan HRA assessed the potential in-combination impacts and determined that some WwTWs in the hydrological catchment of the Fal and Helford SAC would lead to an excess discharge rate into the water courses that feed the SAC. However, appropriate policy mechanisms in the Cornwall Local Plan address this impact pathway adequately (see Policies 23 and 28). These state that *'In areas where development without the provision of adequate facilities could impact on the integrity of the designated or candidate international wildlife sites, including the Fal and*

Helford and River Camel SACs and Tamar Estuaries Complex SPA development proposals will be refused'.

Regarding atmospheric pollution, although the Cornwall Local Plan highlighted that the Newlyn Downs SAC lies within 200m of a major road (A30), air quality modelling concluded that there would be less than a 1% of the Critical Level increase in NOx and of Critical Load increase in nitrogen deposition, and that the cumulative levels would remain below the Critical Level / Critical Load, ensuring that there will be no adverse effect through air pollution. As the Truro Neighbourhood Plan merely supports the level of growth allocated within the Local Plan and does not allocate a further quantum of development, it can be concluded that the Neighbourhood Plan will also not cause an adverse effect through air pollution.

2.4 Landscape setting of Truro and Threemilestone: The review determined that Policy E6 needed to be strengthened through the updating of the work used to evidence landscape setting issues for the original plan. That work completed in 2000 has been updated through the completion of a Local Landscape Assessment and settlement edge assessment that provides a more detailed assessment by a qualified landscape architect of the condition and composition of the landscapes surrounding Truro and Threemilestone using the latest guidance on preparing such work. The work is now used to support applications and has justified the updating of Policy E6. The character work also supports the updating of Policy H1 in terms of providing greater detail in respect of a requirement for new development to protect the landscape setting of Truro. This evidence may be accessed at:

www.trurokeywynplan.org

2.5 Landscape setting of Shortlanesend

The review determined that Policy E6 needed to be strengthened through the updating of the work used to evidence landscape setting issues for the original plan. In the case of Shortlanesend, work was undertaken as part of the Carrick Villages work and adopted in 2004, but that work has been updated through the completion of a Local Landscape Assessment and settlement edge assessment that provides a more detailed assessment by a qualified landscape architect of the condition and composition of the landscapes surrounding Shortlanesend using the latest guidance on preparing such work. The work is now used to support applications and has justified the updating of Policy E6. The character work also supports the updating of Policy H1 in terms of providing greater detail in respect of a requirement for new development to protect the landscape setting of Truro. This evidence may be accessed at: www.trurokeywynplan.org

2.6 Nurturing the Economy

Truro and Kenwyn have considerable employment uses and host both the main hospital for Cornwall and the main offices of Cornwall Council. There is a well-documented mismatch between the number of homes and jobs available and around 14,000 people commute into the plan area for work every day. Truro has the largest retail offer in Cornwall, but is not immune to the difficulties facing retail nationally. Diversification of employment and the retail focus of the city centre are key issues for the whole plan area. The plan aims to create

a vibrant, sustainable, resilient and balanced economy that is responsive to community needs and market conditions.

The revision of the TKNDP has used the retail reports provided annually by Cornwall Council and conversations with the Truro Bid to understand the impacts that the contraction of the retail industry and changing work patterns have had on the city centre and employment areas. This has resulted in an increased flexibility and support being proposed for uses in the city centre that help to diversify and support the vitality of the city centre.

The retail reports and mapping may be found at: www.cornwall.gov.uk/planning-and-building-control/planning-policy/adopted-plans/cornwall-monitoring-report/#townCentres

2.7 Housing

Neighbourhood planning bodies are encouraged to plan to meet their housing requirement, and where possible to exceed it. A sustainable choice of sites to accommodate housing will provide flexibility if circumstances change, and allows plans to remain up to date over a longer time scale. Where neighbourhood planning bodies intend to exceed their housing requirement figure, proactive engagement with their local planning authority can help to assess whether the scale of additional housing numbers is considered to be in general conformity with the strategic policies. For example, whether the scale of proposed increase has a detrimental impact on the strategic spatial strategy, or whether sufficient infrastructure is proposed to support the scale of development and whether it has a realistic prospect of being delivered in accordance with development plan policies on viability. Any neighbourhood plan policies on the size or type of housing required will need to be informed by the evidence prepared to support relevant strategic policies, supplemented where necessary by locally-produced information.

When strategic housing policies are being updated, neighbourhood planning bodies may wish to consider whether it is an appropriate time to review and update their neighbourhood plan as well. This should be in light of the local planning authority's reasons for updating, and any up-to-date evidence that has become available which may affect the continuing relevance of the policies set out in the neighbourhood plan.

Headline figures:

The current position regarding residential sites is that the Cornwall Local Plan apportions 3,900 dwellings to be delivered in Truro with Threemilestone in the period 2010 – 2030. At the time that the Local plan was Adopted in 2016, around 715 had been completed, 2609 permitted. Around 171 windfall dwellings were anticipated between 2021 and 2030 and this formed the base position for the first adopted TKNDP.

At March 2021, 1,481 dwellings had been delivered in the plan area and a further 3,331 dwellings had been permitted. 3301 were not started and 30 were under construction. An average of 25 dwellings per annum were being delivered as windfall sites, indicating that the local plan estimate of 171 windfall dwellings over the period 2021-30 is likely to represent an under-estimation.

Supply and delivery:

Cornwall Council has resolved to grant planning permission for the Langarth development that is subject to one of the key allocations of the TKNDP and outline permission has been granted for the redevelopment of the Pydar Street site. These permissions will add around 1,100 more dwellings to the number already permitted, but unbuilt at Langarth (2,700 under existing permissions across the site) and an additional 320 dwellings at Pydar Street and 400 student bed spaces. Whilst not all of the dwellings permitted at Langarth will be constructed during the plan period up to 2030, commencement of permissions for the new garden village increases the ability to meet the required 3,900 dwellings across the plan area by 2030.

The allocations of the TKNDP at Langarth and Pydar Street will increase the total permitted dwellings to around 4,751 dwellings for Truro and Threemilestone.

It is recognised that not all of these permissions will be delivered prior to the end of the plan period for a variety of reasons (including infrastructure delivery). This will be assessed by Cornwall Council through development and monitoring of a housing trajectory for Truro. The current level of permissions granted (and subject to resolution to approve) is in excess of the 3,900 dwelling CLP apportionment, but reflects that the timescales associated with delivering Langarth means that the site will continue to provide a land supply for housing beyond the plan period.

Policy H1 of the TKNDP continues to provide for flexibility to ensure that there are opportunities to meet housing need in Truro through the granting of permission for suitable housing sites within and adjoining the proposed defined urban area for Truro. Development boundaries have been set for Threemilestone and Shortlanesend to define where infill will be permitted and to allow for exceptions sites linked to local housing needs.

Affordable Housing need:

Truro City

Band	1 bed	2 beds	3 beds	4 beds	5beds	Total
A	40	9	2			51
B	16	3	6	8	1	34
C	81	59	74	23		237
D	39	39	8	1		87
E	216	124	42	2		384
Total	392	234	132	34	1	793

Kenwyn Parish

Band	1 bed	2 beds	3 beds	4 beds	5beds	Total
A	4	2				7
B	1	3	5	1	1	11
C	23	17	27	12	1	80
D	15	15	1			31

E	64	56	15	1		135
Total	107	93	48	14	2	264

This Data is based on a snapshot taken on 4th April 2022 of affordable housing need expressed in the Cornwall Homechoice Register administered by Cornwall Council and shows affordable housing need by band and number of bedrooms required by each household.

Whilst the plan has sufficient permissions and land within the newly created development boundaries and urban extent to meet the Local Plan apportionment, the plan recognises that it is necessary to continue to provide flexibility of choice of sites through exceptions schemes and Policy H1 to allow smaller scale development sites on the edges of the defined areas to come forward where these are led by affordable housing need in the case of Shortlanesend and provide for local needs in Truro.

Evidence linked to specific new or revised policies of the plan:

2.8 Langarth

One of the largest proposals involved in the plan revision is the proposed allocation of the previously consented Langarth scheme, subject to the development of a binding masterplan for the site to address community concerns and aspirations.

The NDP Steering group was just one a large number of participants involved directly in the steering of the masterplan as part of a 'Stakeholding Group'. This group was chaired by a member of the NDP Steering Group and involved debating the principles and aims of the Langarth masterplan and eventual planning application. The masterplanning aims of the NDP were tested with the stakeholding group, including wider community representatives and embedded in the eventual masterplan (in accordance with the policy of the proposed revised NDP).

The Langarth Garden Village Team also shared the views and ideas and aspirations expressed by participants involved in the Langarth engagement events.

In preparing the proposed allocation for the Langarth area, the TKNDP group shared evidence being gathered by the Langarth team and discussions with communities and the stakeholder group to inform the development of the principles for development of the site. This included ecology and green infrastructure information gathering, landscape impact of both the site and the wider work carried out the TKNDP, surveys of local residents and stakeholders, work underpinning the development of the Governors extension to the site and additional heritage impact assessment to help identify that the proposed extension of the Langarth allocation could be undertaken.

The evidence for the development of the Langarth application may be viewed at:

<https://planning.cornwall.gov.uk/online-applications/applicationDetails.do?keyVal=QJAI93FG1X300&activeTab=summary>

The iterative engagement of the Steering group in the Stakeholding group and working alongside the team developing the masterplan allowed for development and testing of the masterplanning proposals of the TKNDP with both the wider community and the master developer for the site. This ensured that evidence and ideas were thoroughly tested and met both community aspirations and commercial reality. The iterative process allowed for steady development and testing of policy ideas as the plan progressed alongside the designing of the Langarth scheme and has resulted in a more robust, evidenced and community focussed policy for the allocation of the site and security that the proposals will be maintained in terms of quality and aspiration.

2.9 Pydar Street site

Members of the City Council (including members of the NDP Steering Group) were engaged in a similar process for the development of the masterplan and planning application for the Pydar Street site. Members formed part of a 'MOU Group' that were engaged in the planning of the site alongside extensive engagement of the community between April 2018 and February 2020. This included community events, film screenings, the setting up on an on-site consultation facility and attendance at local events including Truro Day.

Community feedback on the scheme set out an aspiration for creating urban homes in central Truro; walkable neighbourhoods; community facilities; enabling of learning, innovation and entrepreneurship; a dawn till dusk economy for central Truro; streets and squares in place of roads and car parks and a scheme that will respect and enhance the heritage of Truro. These aspirations and other views have been used to feed into the policy for the Pydar Street site.

The evidence for the development of the Pydar Street site application may be viewed at:

<https://planning.cornwall.gov.uk/online-applications/applicationDetails.do?keyVal=QSQOXQFG0H300&activeTab=summary>

As per the Langarth group sessions, The iterative engagement of the Steering group in the Stakeholding group and working alongside the team developing the masterplan allowed for development and testing of the masterplanning proposals of the TKNDP with both the wider community and the master developer for the site. This ensured that evidence and ideas were thoroughly tested and met both community aspirations and commercial reality. The iterative process allowed for steady development and testing of policy ideas as the plan progressed alongside the designing of the Pydar Street scheme and has resulted in a more robust, evidenced and community focussed policy for the allocation of the site and security that the proposals will be maintained in terms of quality and aspiration.

2.10 Education

Cornwall Council's Education team provided additional evidence of need within the plan area and an update on projects planned. This led to confirmation that the text and approach of the policies remained sound subject to small scale changes to the policy wording and supporting text.

2.11 Open Spaces

Cornwall Council's Public Open Space team provided some small changes to the text for the policy including a small change to the overall open space requirements for the plan area. The contributions from that team to the development of the Langarth and Pydar Street schemes has helped to ensure that sufficient open space is being planned for the significant new populations planned for those sites. In addition, survey work was undertaken by the TKNDP team to understand how people used our existing green spaces during the pandemic period. This has led to the use of infrastructure funding to expand open space at Coosebean and to identify actions for the revision of the Truro and Kenwyn Green Infrastructure Strategy, which is currently under preparation.

Additional open spaces identified under policy LC3

Carvinack Meadows, Shortlanesend – The land at Carvinack Farm was developed following adoption of the TKNDP. This land has now been set out as open space and is important to the health and wellbeing residents and for the wider community. It is considered that it should be protected as part of the open spaces network in Shortlanesend.

Nancemere, Truro – Land adjacent to the Bodmin Roundabout, formerly part of Nancemere Farm and now known as Treffry Road, was transferred to the City Council following the adoption of the adopted TKNDP. The land is being managed to provide an open approach to Treffry Road. It is considered that this land should be protected as part of the network of open spaces in Truro.

Beechwood Park – Land at Beechwood Park has now been passed to the City Council and has undergone significant improvement in collaboration with local residents. It is valuable to that community and now forms part of the network of open spaces in Truro and warrants protection as an open space.

2.12 Development Boundaries for Threemilestone and Shortlanesend

Development boundaries for Threemilestone and Shortlanesend were developed using the methodology for boundaries provided by Cornwall Council:

<https://www.cornwall.gov.uk/media/kqvjshiq/development-boundary-guidance.pdf>

Shortlanesend has been subject to significant growth within the Local plan period from 2010, with large developments added at Higher Carvinack and off School Hill. This has considerably added to the population of Shortlanesend and increased pressure on local services such as the shop and school and recreation ground. Shortlanesend is some distance from the edge of Truro and for more significant growth to the undertaken considerable improvements would need to be made to connectivity for active and sustainable transport modes, including significant improvements to the frequency of the bus service. The development of the boundary has taken the approach that development should be of a small scale unless required to meet an identified local need through an exception site.

In developing the boundary, the working group considered the following:

Areas with significant environmental constraints were discounted, including land to the north east of the village that forms part of the Area of Great Landscape value and a County Wildlife site and to the south west surrounding the electricity distribution station off School Hill. The village is surrounded by best and most versatile farmland.

Areas with permissions and that had been built since the last time that a development boundary were set were included in the proposed boundary – these included the Pastures and Carvinack Meadows to the east and Kenwyn Heights and Roseworthy Road to the south.

The edges of the settlement were assessed to understand whether any land would meet the requirements of ‘infill’, ‘rounding off’ and ‘PDL’. An area adjacent to Kenwyn Heights has been included as this sits within the visual envelope of the village. The remainder of the form of the village is defined by its compactness and regular shape. Whilst land had been advanced for consideration to the north west of the village, it would be visually prominent and difficult to form a logical boundary. Further development to the south of School Lane would be highly visible in views from the south and impact on the setting of the village.

A landscape assessment has now been undertaken in support of the settlement edge analysis that would be required to support any future application for housing beyond the development boundary.

2.13 Threemilestone

Threemilestone has expanded considerably from its origins and has largely reached the point where there are few options remaining for expansion that would not involve leapfrogging the A390 or railway line, which are its chief constraints. Even with more limited growth since 2010 there remains pressure on local services such as the shops and school and recreation ground. Significant growth has been granted planning permission to the north of the village at Langarth, which will more than meet the needs arising from Threemilestone. The development of the boundary has taken the approach that development should be of a small scale unless required to meet an identified local need through an exception site, for which there are limited opportunities due to physical constraints and landownership.

In developing the boundary, the working group considered the following:

There are no designated landscapes or sites of nature interest, but village does have good quality farmland at Besore to the east.

Areas with permissions and that had been built since the last time that a development boundary were set were included in the proposed boundary – these include small areas of development in the south of the village.

There are, as noted above significant barriers to growth. The north is defined by the A390 and has been allocated for development in this plan. The land to the west is now developed for commercial and industrial floorspace and to the east is farmland in control of Cornwall

Council, which is leased to a farmer and protected for Biodiversity Net Gain and compensation for roosting and nesting habitat lost at Langarth Garden Village.

The edges of the settlement were assessed to understand whether any land would meet the requirements of ‘infill’, ‘rounding off’ and ‘PDL’. There are relatively few opportunities for this within the village, but redevelopment of land has been permitted at Victoria Mils and the former Wards garage (houses and a Co-op). Due to constraints to the west, north and east, the only other land that is likely to be brought forward is to the south western edge of the village. This land is generally constrained by a lack of connection opportunities to the road network and provides a valuable role in the setting of the village from the south. There are a number of houses within large areas of garden that help provide this character and they have been excluded from the boundary due to their low density layouts. These may provide opportunities for exception sites if needed, but require careful consideration due to the more sensitive and semi-rural nature of this edge. A landscape assessment was undertaken in support of the settlement edge analysis that would be required to support any future application for housing beyond the development boundary.

2.14 Urban extent for Truro

Truro is a large and complex settlement area with considerable pressure for growth and an elevated housing need. In this way, an absolute boundary to development is very hard to create, not least because policy H1 is flexible and allows for growth on the edges of the settlement where it is of an appropriate scale. The urban extent is not a hard development boundary. It is an indication of the land within which significant development sites will be brought forward. However the plan still allows for proposals that are genuinely predicated on local housing need to be brought forward and supported, but importantly does not allow for significant growth sites beyond those already with planning permission or those allocated by the TKNDP revision.

The approach justified by this evidence is for the definition of an urban extent that provides certainty of where the urban form of the city begins and ends and therefore where policies of the Local Plan (most importantly Policy 3) and H1 of the TKNDP apply and therefore where the limits to additional major growth are. Policy 3 of the Cornwall Local Plan is clear that:

“Delivery of housing ... provision will be managed through a site allocations DPD or neighbourhood plans for the following areas ... Truro with Threemilestone”.

In the case of Truro with Threemilestone land has been identified through existing permissions and proposed allocations at Pydar and Langarth and previously developed land in the urban area that can meet the housing apportionment made to the area through the Local Plan. This is supported by the plan allocating sites for major growth and having existing permissions, which in turn mean that the plan does not have to plan for additional major sites to meet the Local Plan apportionment. It does however accept that additional growth may be required of a suitable scale and taking into account the landscape setting and other issues where it is justified by meeting local housing need.

The plan makes provision for the allocation of significant sites at Langarth and Pydar Street as well as support for the development of infill sites within the urban area. It takes into account existing development that has been permitted at Dudman Farm and Higher Newham and the remainder of Tolgarrick/Copperfields (Pydar Street and Langarth had not obtained planning permission at the time that the 2021 CC trajectory was developed and therefore it did not include the additional dwellings now permitted in what might be built in the next five years).

The exclusion of sites granted permission but not implemented from the urban extent is pragmatic. The plan does not exclude those sites (they are shown in grey sitting beyond the settlement line) and the policy text makes it clear that if they are implemented they will be considered as part of the urban area. Where they are not implemented then any application can still be considered, but under the current planning requirements, including their impact on the landscape setting of the city etc in line with the revised TKNDP policies and the Cornwall Council Climate Emergency DPD. The existence of an existing or recently lapsed permission will be a material planning consideration to be weighed alongside the benefits and disbenefits of a scheme.

The drawing of the urban extent has been undertaken on a basis of fact and degree (e.g. whether the land forms part of the urban area. This is because, as set out above, there is no requirement for the identification of further significant sites because sufficient land is either permitted or allocated and there is flexibility for smaller sites to be brought forward as justified by need. The landscape work undertaken for Truro and Threemilestone will also be used to justify where development could (and could not) reasonably be integrated without harm to the landscape setting of the settlement or other factors.

The pre-submission consultation on the TKNDP revision received representations seeking more significant development on land to the north of the city. The sustainability appraisal (points of compass) and landscape work does not support the extension of the city to the north and there is insufficient scale to create infrastructure to make the extension sustainable. The allocation of the site at Pencoose and allowance of development on the Enys Land would represent a further extension of the urban area beyond the landscape setting of the city. The transport strategy does not plan for growth in this location and sustainable transport modes would be difficult to retrofit into the developments to link with the city centre.

Further options to explore a planned extension of the city to the north should only be explored once work is commenced on a new Cornwall Local Plan after this iteration of the neighbourhood plan (which already has conformity with the existing LP requirement and provides flexibility to meet need arising within the plan period).

3. Delivery

Ensuring that the TKNDP is deliverable requires:

- That sites identified for development are capable of being brought forward within the lifetime of the Plan;
- That the policies in the Plan are capable of being implemented during the lifetime of the Plan; and
- That infrastructure requirements are clearly identified.

3.1 Sites can be delivered in the plan period

Cornwall Council produces trajectories of housing growth each year to inform the monitoring of housing supply. This information, which is verified by the Planning Policy team of Cornwall Council using information from developers and landowners can be found at:

<https://www.cornwall.gov.uk/planning-and-building-control/planning-policy/adopted-plans/cornwall-monitoring-report> The information has informed the development of an understanding of the likely need for additional land or significant sites to be allocated within the NDP in accordance with Policy 3 of the CLP. Please note that the Pydar Street site is not currently reflected in the trajectory due to the date of permission granted, but will be added to subsequent trajectories as it is recognised that the site can be delivered within the plan period up to 2030.

3.2 Policy delivery

Policies have been developed to be in general conformity with the strategic policies of the Cornwall Local plan. They relate to the plan period of 2010 – 2030 and current challenges.

3.3 Infrastructure Requirements

Cornwall Council has continued to work with infrastructure providers to identify what is needed to support the growth of the TKNDP area as part of its ongoing monitoring of the Local Plan and in preparation for a future local plan. One benefit of the significant planning permissions in place is that the infrastructure providers can identify with some certainty the location, scale and timescale for development and plan their requirements on a secure evidence base.

The infrastructure requirements set out in the Infrastructure Plan are based on the knowledge and information available at the time of its preparation. These are made without prejudice to any formal conclusions that the infrastructure providers may later reach, for example, in relation to changes in service delivery, funding and infrastructure requirements. Needs and detailed requirements will continue to evolve during the lifetime of the TKNDP, Cornwall Council's Planning Policies and any subsequent DPDs.

The development of the planning applications and masterplans for the Pydar Street and Langarth sites has further enhanced the understanding of the capacity of key infrastructure in the plan area. This includes completion of expansion and reinforcement work to the Newham Sewage Treatment works.

This will be kept under review as part of the monitoring process. Facilities and services directly required by new development will be expected to be funded by the developer. New development will give rise to additional demands on infrastructure that is best met through financial contribution towards off-site provision. This will be negotiated by Cornwall Council as part of the planning agreement. Since the completion of the original TKNDP, the Community Infrastructure Levy (CIL) has been introduced, however on-site infrastructure and affordable housing are still being secured through Section 106 agreements. The TKNDP team continues to work with Cornwall Council and service providers concerning the provision of infrastructure projects and bidding for CIL monies for projects that help increase infrastructure provision for our communities. Both Councils in the plan area receive the 25% CIL top-slice for infrastructure projects.

There are broadly three types of infrastructure:

- **Physical infrastructure:** transportation networks, water, drainage, waste management, sewage treatment and utility services.
- **Social infrastructure:** education, health facilities, social services, emergency services and other community facilities such as libraries and cemeteries.
- **Green infrastructure:** parks, allotments, footpaths, play areas and natural and amenity green space.

We recognise that some infrastructure types such as essential utility infrastructure, schools etc. are critical or necessary to ensuring that sufficient services are available to meet the needs of existing and future residents. Other infrastructure categories are more directly related to quality of life and biodiversity enhancement. We also recognise that - whilst we may wish to secure the delivery of all infrastructure items - prioritisation may be required, particularly at the development management stage on applications to reflect development viability, availability of public sector funding sources and service priorities at that time.

The TKNDP group will continue to work with Cornwall Council to seek the required infrastructure for the plan area as well as using its CIL proportion to advance the necessary infrastructure.