

Bodmin Town Council



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

Date: 10 July 2018

Our Ref: SMF/P/2018

Your Ref:

Dear Sir,

Bodmin Site Allocations DPD – Cornwall Council response to the *Inspector's Note INSP.S14 in relation to Bodmin* dated 28 June 2018.

I write in connection with the Bodmin Site Allocations DPD and further to the Cornwall Council response to the *Inspector's Note INSP.S14 in relation to Bodmin* dated 28 June 2018.

Bodmin Town Council's Planning Committee, which met on 4 July 2018, has instructed me to write to you to set out its views with regards key elements regarding Cornwall Council's response, which are as follows:

Westheath Road – pages 4 to 6 refers – Policy Bd-H1 (50 dwellings)

Bodmin Town Council is disappointed to see this included within the Bodmin Site Allocation DPD as this site has previously been considered to be a 'rounding off' windfall parcel for development. Bodmin Town Council is also of the strong view that should this allocation be accepted as an additional growth site to deliver up to 50 dwellings that this should lead to a concomitant reduction of the Bd-UE2 allocation by up to 50 dwellings which might assist with a more modest scheme enabling greater emphasis on Section 118 of the NPPF to encourage biodiversity in and around any scheme to mitigate the harm to the environment (i.e. adjustment of allocation of either the new proposed Bd-UE2 (a) or Bd-UE2 (b) sites to reflect the inclusion of housing target numbers in Bd-H1)

The Town Council would also highlight its very serious concerns regarding any proposed access and egress for this site onto Westheath Avenue given the known road safety issues with that road. Any proposed access onto Westheath Avenue will only exacerbate road safety issues whilst generating further real and very serious concerns for road users' safety given speeding traffic to / from Bodmin. The Bodmin / St. Austell Road (A389) is a known area where vehicles travel at excessive speed and it is not uncommon to see a Police speed camera van attend in an ad hoc attempt to ameliorate this issue. Vehicles are known to accelerate in the St. Austell direction once they have negotiated the roundabout at the Westheath Avenue / Boundary road / Westheath Road junctions. Coming from the St. Austell direction, vehicles travel at considerable speed, in excess of the 60mph limit towards Bodmin having gained momentum down the hill towards the Bodmin Plant & Herb Nursery. They continue their accelerating approach as they come up the hill towards this site (Bd-H1). Any proposed filter lane into this site, if that was an early thought of Highways, would not be an attractive proposition given the manoeuvre to cross traffic. Whilst not wanting to be alarmist, this would be a fairly clear example of 'an accident waiting to happen' and something which would need designing out from the outset. Any form of access / egress from this busy road onto the Westheath Road site would require significant road safety assessment which is unlikely to demonstrate removal of road traffic collision risks should vehicular movements into and out of this site be deemed appropriate.

The Town Council would therefore promote and emphasise the strong need for access to be achieved and delivered from Westheath Road as this is a 30mph residential area which does not suffer from the road safety issues highlighted above. It would be helpful if you could consider this request and support the Town Council given the very obvious risks that a Westheath Avenue access / egress would create. It is hoped that you can see fit to make this a requirement for any scheme looking to deliver housing on Bd-H1.

Halgavor Urban Extension – pages 9 to 11 refers – Policy Bd-UE2a and Bd-UE2b

Bodmin Town Council would refer you to its letters of 25 April and 2 July and strongly reiterate its position and concerns with the hydrological issues that this site presents. Whilst not wanting to go over that detail again, as you should have copy from the Programme Officer and via Cornwall Council, I would highlight the following if the Bd-UE2 allocation is determined to be sound:

NPPF Section 118 – *'When determining planning applications, local planning authorities should aim to conserve and enhance biodiversity'* – if the Bd-UE2 allocation remains an appropriate development site it might be considered an opportunity to encourage and incorporate biodiversity in and around any development to mitigate any 'harm.' This may well be seen as a positive step by local people should the allocation be endorsed.

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

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

If Bd-UE2 is considered an appropriate allocation then Bodmin Town Council would welcome an opportunity to input into any masterplan design with the local planning authority and a developer to ensure that any development aligns with the town's aspirations and to positively explore Section 118 of the NPPF to mitigate environmental harm by incorporating biodiversity into and around any scheme.

Transportation matters:

Bodmin Town Council would highlight the following section to the Inspector.

INSP.S14 - Section 1: Bodmin Transport Evidence

10. Harleigh Road / Beacon Road (over the bridge) One-way System – Not included within the SADPD as the project has already commenced

Appendix 1 - Bodmin Transport Projects - DPD Transport Strategy Measure

10 Harleigh Road / Beacon Road (over the bridge) One-way System Not included within SADPD as it had been already delivered prior to completion of document. Status - Delivered

Cornwall Council state in the *Bodmin Transport Projects - Appendix 1* refers that the one way conversion of Harleigh Road and the iron bridge on Beacon Road as being 'delivered.'

Bodmin Town Council is of the view that this could be misleading, as the statement gives the impression that Cornwall Council has delivered the infrastructure to facilitate the move to a one-way system for this part of the town. Cornwall Council have intimated that there will be a consultation regarding the proposal to move the bridge on Beacon Road and Harleigh Road to 'one-way,' however that piece of work has not been progressed and the public and Town Council are still awaiting confirmation that this consultation will proceed and / or when this is likely to take place. Bodmin Town Council is of the firm view that in order to be able to demonstrate full delivery and implementation of any growth agenda Cornwall Council needs to be held accountable on its commitments to infrastructure upgrade work, as without the necessary investment and transport improvements the development plan will fail. It is therefore hoped that the Inspector will consider the deliverability of transport infrastructure and estimated completion dates carefully to ensure that there is harmonisation with the levels of growth over time and further, that it is appropriate and robust and will not leave the town with a congested road network whilst new developments are being constructed and opened.

Public Consultation

Bodmin Town Council was very pleased to have facilitated a public meeting on 14 May 2018 with local residents and Matthew Brown (Strategic Planning, Cornwall Council).

Whilst this proved to be a very informative meeting regarding the Local Plan process, Members of the Council and local residents were concerned that their views were not wholly taken into account at that meeting and further, that Cornwall Council's approach to consultation in the run up to the preparation of the Local Plan and SPD's could have been managed significantly better with room for desired improvement given the apparent lack of public knowledge about the Local Plan and the Site Allocations.

Bodmin Town Council would urge that any next phase of consultation on modifications and / or next steps relating to the Site Allocations has a strong emphasis on engaging with local residents and that the methodology is reviewed to ensure that as many people in the town are aware of their opportunity to contribute and to have their say. Whilst this may be considered 'too late' given the advanced proceedings, it would be an opportunity missed if any next round of consultation was not well publicised and / or a facility to 'drop in' to submit comments / feedback forms etc was not provided and held in Bodmin.

Thank you for taking the time to read this further letter on behalf of Bodmin Town Council.

Yours faithfully,

A handwritten signature in black ink that reads "S.M. FACER". The letters are written in a cursive, slightly slanted style.

S M Facer
Town Clerk

Cc: Councillor S Kinsman (Mayor of Bodmin);
Councillor A Coppin (Chairman, Planning Committee);
Scott Mann (MP for North Cornwall)
Cornwall Councillor J Gammon (Bodmin St. Marys);
Cornwall Councillor P Rogerson (Bodmin St. Leonards);
Cornwall Councillor L Frost (Bodmin St. Petrocs)