

Area Action Plan for Camborne, Redruth, Illogan and Pool 2006- 2026

Enough is enough!

An Analysis and Review of Issues

Cornish Social and Economic Research Group

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This report is divided into four sections.

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4. An overview of the main issues.

The commentary provides an analysis of points raised in the draft plan.

It is important to refer to the main issues section where a more detailed analysis of the issues is provided.

It could be argued that alternative policies required to address the issues raised in our critique, are outside the scope of the AAP. However, we contend that there is a need to explore alternative policies and place them on the agenda. Where political action is necessary to make policy changes, then such actions should be pursued and the appropriate structures of governance established. It is our contention that a Cornish Assembly would have the appropriate powers to make policy, which would meet the needs and aspirations of the population, rather than the current system where local government in Cornwall is constrained by central and regional targets.

1 Summary of views

The Camborne-Illogan-Redruth (CIR) area has seen substantial population and housing growth in the past.

Future targets for housing for the area are excessive, unsustainable and threaten the quality of life. Enough is enough.

Housing targets should be based on local need rather than designed to fulfill targets imposed by South West quangos.

A target of between 2100 and 3000 represents a realistic figure.

Contrary to perceptions, CIR does not have large areas of brownfield land for development.

Housing and other development proposals will lead to significant numbers of car trips generated and will make the attainment of carbon reduction even more difficult.

Proposed developments would have a significant impact upon the character of the area, leading to the loss of the small-scale settlement pattern, which is characteristic of Cornwall.

2 Response to Questions posed in the AAP

1. Is this a fair summary of the issues facing Camborne, Pool, Illogan and Redruth to which the AAP needs to respond? Are there other issues that the plan should tackle?

Population structure

The plan should aim to meet the needs of a stable population and create steady-state sustainable communities.

Economy

The objective here should be to move away from a low earnings economy, providing a range of better skilled and paid jobs; upgrading the local workforce through investment in training.

Travel

Travel within the area has to be reduced. The focus should be on an increase in the bus services linking the various areas. There is also a need to develop public transport to ensure that both commuters and visitors from elsewhere in Cornwall use cars as a last resort.

Shopping

There should be range of retail facilities on offer, with the aim of encouraging local shopping, though here care must be taken not to allow retailers to create stores which suck in trade from other settlements. Greater emphasis should be placed on encouraging internet shopping to reduce travel.

Environment

There is limited brownfield land in the area.

Housing

The focus must be on affordable housing schemes, which are not developer led.

2. What do you think of this vision? Is this the place you want to see and that we should all strive to bring about?

The vision as set out is inappropriate and self-contradictory.

A properly sustainable and community-oriented vision would seek to:

- Maintain a stable population
- Protect the distinctive communities ensuring that the mix of rural and urban landscapes is retained
- Ensure employment opportunities result in a highly skilled workforce able to compete in the 21st century;
- Make best use of land in terms of providing biodiversity
- Minimize car use in the area
- Switch investment from increasing road capacity to providing a cheap, convenient, quality public transport system.

- Retain the character of Cornish towns and communities with the interspersions of rural and urban landscapes, small scale groups of buildings and distinct vernacular architecture.

3. Are these the right objectives for the AAP to drive the work of the Council, other public bodies, developers and the community? Are there other priorities that have not been included?

No

Identity

Ensure that areas retain their identity and not attempt to create a substantial urban area.

Regeneration

Regeneration should be used to improve the area for the local community, yet retaining its important and unique heritage. Improve is a word which can be misused. It should not for example, result in turning revegetated land used for informal recreation into London style parks with expanses of lawn. Crucially, it should not aim to turn it into an urban area indistinguishable from any found in England.

Economy

To sustain, grow and diversify the economy by nurturing existing businesses, promoting entrepreneurial activity and attracting investment to achieve at an appropriate level of additional jobs to meet local needs.. This will include providing more rewarding and higher skilled jobs, with a corresponding improvement to the skills of local people and to the capacity of the workforce.

Housing

To provide housing at a level consistent with the need for housing arising from the changing household structure, and making a significant contribution to the need for affordable housing, achieving a net increase of between 2,100 and 3,000 homes with a balanced mix appropriate to the needs of the communities in the future. [Figure takes account of dwellings needed to reflect changes in household structure – estimated between 2100-2500, and 500-900 to allow for other changes].

Infrastructure

Accessibility

To achieve greater non-car accessibility to jobs, shops, health, education, leisure, recreation, green space and community facilities through a combination of appropriate new jobs and facilities, focusing upon improved public transport and bringing in measures which discourage excessive car use. Opportunities for cycling and walking should be encouraged, though it would be unrealistic to see these as the main means of reducing car use.

Quality

Environment

Retain areas of green land within the 'urban' area. Manage existing minescapes, where development use is not appropriate, to retain biodiversity and informal use. Make better use of existing parks and open spaces.

4. Is the Council's approach to setting the level of housing to 2026 by linking the level to the growth in the number of jobs, the right way to proceed?

No.

5. Which scenario do you favour: Scenario 1 - 6,000 homes; Scenario 2 - 9,400 homes; or Scenario 3 - 11,100 homes?

None of the above. Scenario 1, the 'lowest' option is excessive. Our preferred options are either CoSERG 1 or CoSERG 2, achieving a net increase of between 2,100 and 3,000 homes with a balanced mix appropriate to the needs of the communities in the future.

6. Is the Council right to want to use up all the vacant land within the urban areas? (please note that public open space will be protected)

No. 'Vacant' land within the area can be an important resource for the community – whether for agricultural use, open space or 'wild areas'. Essential for maintaining the rural/urban mix characteristic of the area.

7. Which of the options for combining housing locations outside the present urban areas seems best, given the amount of housing to be provided - HA, HB or HC?

We do not accept either of the options. If appropriate policies were pursued there would be no need for the land outside the urban area.

8. Are there other combinations of the locations from Map 1 that are better than HA, HB or HC in accommodating future housing requirements?

No.

9. Laity Fields in Camborne is built at 45 dwellings per hectare. The AAP will seek to deliver 40 dwellings per hectare on the urban extensions. Do you think this is appropriate or would you prefer housing to be built at lower densities with the implication that more greenfield land will be needed for development?

No. We have to seriously question the rationale here. The argument put forward is that if we have developments at higher density then less greenfield land is needed. But the main issue is why is Cornwall having to meet unsustainable housing targets. We have a situation where people are expected to live at a higher density (when survey evidence suggests this is not what is preferred). It could be argued that there is a trade-off between high-density living and an increasing population and lower density living and a stable/declining population. It could also be argued that another side effect of high-density living is that with limited garden space and the loss of the rural/urban mix, there will be a greater incentive to travel.

The community should not be presented with the 'choice' higher density or more land used. This 'choice' is a consequence of attempting to reach unsustainable and unnecessary targets.

10. Which of the options for developing shopping and town centre facilities should the Council seek to bring about?

There are a significant number of assumptions to take into account, which makes it difficult to be prescriptive. However, some common themes emerge: to minimize car travel and retain local facilities. For some goods it is unlikely that each area would justify a local centre. However, it is desirable to move away from the concept of consumers having to travel to retail centres. Internet shopping should be encouraged as a means of increasing sustainability. The store might be in Pool or Penryn, while the consumer could be anywhere.

The system developed by Amazon is of importance here, where retailers all over the globe can link up through a common system. Consumers are able to purchase without traveling.

11. Which of the options for the location of offices should the Council promote - OA or OB?

In planning terms we consider there is no advantage in locating office space in one location.

12. Do you think that using available land on or adjacent to existing industrial estates is the right approach or are there other locations that should be considered?

We note that there are limited brownfield sites for employment use. Most of the 'brownfield' at Pool is to be greened.

13. Which of the illustrative strategies best reflects your preferences for the location of housing, shopping and offices - illustrative strategy 1, 2, 3 or 4?

We do not consider that one option has greater merits than another.

15. Are there changes to the way transport works that need to be sought that are not yet identified in the Local Transport Plan and that the AAP should pursue?

Yes. There is a need to switch investment from increasing the capacity of the road network into reducing car use, through the provision of a cheap, convenient, efficient public transport system. Policies to encourage less car use through road pricing, workplace car park pricing and charging for all car parks used by the public should be introduced. We need to create a level playing field to enable non-car users to compete fairly. There is no such thing as a free car park. The current system also results in car users obtaining a subsidy from non car users, this is inequitable.

For some inter-urban trips and intra-urban trips, rail travel is appropriate. Despite the recent focus upon high speed links, the priority should be to invest in increasing the capacity of the existing network and reducing prices. It is unlikely that a high speed link would be of much use to local communities seeking to make short trips.

16. Is the approach to the identification and provision of infrastructure right? Are there other aspects of infrastructure that should be considered?

No additional comments.

17. What views do you have on the way that the plan can help to provide affordable housing?

We do not consider that it can. Dependence on developer-led housing projects cannot succeed as a solution to the provision of affordable housing where the developer has agreed to build such housing as part of a wider development, (assuming a 25% rate) depends on building three times as many houses that are unaffordable. This underestimates the actual number of unaffordable houses built as developers often have sites where affordable houses are not included in the development.

CoSERG contends that a new approach is required to address the affordable housing issue, namely

- Aim to reduce Cornwall's population growth to a steady-state demographic regime.
- Ensure that the planning system is able to restrict permission for inappropriate developments, which do not meet local, needs.
- Ensure through the planning system that residential property is kept for residential use rather than investment purposes.
- Focus on the provision of affordable housing, possibly by directly providing social housing rather than relying on the developer-led approach.
- Ensure that the transfer of residential property to non-residential purposes is subject to obtaining planning permission.
- Build for local need not luxury demand.

Rather than repeating the government mantra of 'just build more', Cornwall needs to address the underlying issues to create a sustainable solution to affordable housing.

18. How should the Council seek to manage the density at which development takes place?

We do not accept that increasing density is appropriate either in terms of sustainability, community cohesion or quality of life.

19. Is the suggested approach to phasing issues right in the circumstances? Would you wish to see a different approach and how would this work?

We consider that housing should reflect local needs and priorities not be based upon future job creation figures.

20. What views do you have on the way that the Council should seek to use developer contributions?

Though ostensibly a plausible approach to funding infrastructure, the danger is that developers will seek to develop higher numbers of unaffordable dwellings to fund the infrastructure. A major reason for the 'need' for more infrastructure is to accommodate the additional population, which the new housing will attract.

The lack of public funds is a consequence of successive Government's inability to address questions of social inequality through use of the tax system.

21. Are there other matters that the policies on 'creating high quality places and buildings' (para 5.42 - 5.66) ought to deal with?

We do not consider that high density housing developments will create high quality places. For example there is no history of three storey dwellings in the area. The new flats at Roskear do not accord with local vernacular dwelling style.

22. Is the range of matters on which policies are proposed to be included sufficient? If not, please suggest what is missing.

Lacks real policies on sustainability.

Any other comments

23. The questions highlighted in this document are not meant to be exhaustive. We welcome any other comments you wish to raise in relation to the Area Action Plan for Camborne, Pool, Illogan and Redruth.

Please refer to Section 4, for additional comment and background material.

3 Commentary on extracts from the draft AAP

Summary of the key issues for the District

2.71 The issues that arise from this review that are most significant in developing the strategy are:

Population structure

The population is aging, but importantly, there is also a projected growth in the working age population.

The projected increase in the working age population is due not to an increase in the local working age population but to excessive movement of people into the area.

Economy

The economy has been growing and is projected to continue to grow. Manufacturing is declining while the service sector is growing. Whilst unemployment is low, income is well below the national average. The area is eligible for Convergence funding.

Despite the implication that new jobs will provide better quality jobs and raise incomes, the projected increase in new jobs will only keep pace with the projected increase in the population. The numbers of employed in the past have increased yet incomes have not in relative terms. Indeed, relatively low incomes in Cornwall are a result of excessive population growth producing a supply of labour unmatched by demand. The implied solution in this plan is actually part of the problem. To continue with it is a classic policy folly.

Travel

Camborne, Pool and Redruth are relatively well served by public transport with good east-west connections, but north-south is comparatively poor. Major constraints exist at East Hill junction and future growth is dependent on increased capacity here. Congestion and air quality issues require longer term measures to resolve them.

Using the term 'major constraints' at East Hill Junction and then indicating a need to increase capacity to allow future growth glosses over why there is a problem and assumes that increasing capacity is the answer. The problem is not lack of capacity; it is excessive demand. Congestion in the area is a consequence of:

- 1) over dependence on car use;*
- 2) the growth of traffic-generating developments at Pool;*
- 3) and, fundamentally, continued population growth.*

Rather than addressing these issues the plan encourages more of the same. Indeed the aim is that more traffic will use the A30 and then via East Hill make its way to various mega developments in Pool. Proposals to encourage (car) traffic generation sit uneasily with a rhetoric of reducing car use.

Environment

There is a lot of brownfield land and a need for environmental enhancements, including an improved image for the area. Natural assets, including important green corridors and public open space need to be protected.

The extent of brownfield land is grossly over-estimated. A number of sites which are badged as brownfield are in reality a mixture of brown and green. Contradicting the 'green' rhetoric of this paragraph the plan envisages substantial development of green areas, whether agricultural land or other 'green' sites.

Deprivation

There are 10 areas within Camborne, Pool, Illogan and Redruth, which are among the 20% most deprived areas in the country for health, income, education and employment.

'Extra' jobs and facilities will not assist in redressing this imbalance as they will be required to meet additional population growth. Where is the evidence to suggest that massive population growth leads to a reduction in deprivation rates?

Housing

A large proportion of the future housing requirement in the area will be from those who are unable to afford market housing. There is a tendency towards smaller households so that the same number of people in the future will require more homes.

Yet most new housing envisaged in the plan will be unaffordable and will not be built to meet local need/requirement.

THE VISION

The communities collectively have developed and enhanced their role as a subregional centre for employment, education and various leisure pursuits, complementing the wider network of key settlements along with Truro, Falmouth and Penryn in doing so.

Runs counter to the aim of sustainability. Fundamental to that notion is the provision of facilities for local use, e.g. provision of local level leisure facilities, not the expansion of the CBC to serve the wider area.

New and expanded business facilities are easily accessible from the A30 and by local residents.

If facilities are easily accessible from the A30 then there will be additional commuter flows from other areas. There is a paradox in the plan with reference to reducing car use, yet policies which encourage car use.

The populations of Camborne, Pool, Illogan and Redruth have grown significantly, but each area remains individual and distinctive, with strengthened communities that still complement one other. The growth has been handled sensitively, indeed used as an opportunity to enhance local services and facilities – such as new schools, health facilities, shopping, transport links and open space.

It is unwise to suggest that with significant population growth it will be possible to retain the various distinctive communities that currently exist. If proceeded with, the proposals for Park Bottom and Illogan would overwhelm these distinct communities.

To suggest that the existing community will obtain enhanced local services and facilities as a consequence of significant population growth is incorrect. There may be 'additional' facilities but their purpose will be to cater for a larger population. It is quite possible; indeed it may be desirable to enhance existing facilities

Green space is a recurring theme throughout the four areas, with networks of green space, linking quality open spaces in the urban area with the countryside and the coast.

This is a laughably impossible 'vision' if the housing figures are adopted and green areas within the 'urban' area are developed, thus resulting in the loss of existing gaps between settlements. There are already green spaces within the urban area. However, a high proportion of these will be developed. There are various areas within CIR where there is a mix of residential and green space, for example the area of the proposed Tuckingmill urban

village. 'Greening' will also lead to a loss of biodiversity, particularly where land has regenerated and thus contradict its own aims.

Camborne, Pool, Illogan and Redruth provide a wide range of new housing opportunities, with choices of rent or purchase and much of it affordable.

Current policy cannot provide affordable housing. The developer led approach cannot meet local need.

A new web of avenues and streets suitable for buses, pedestrians and cyclists, as well as cars seamlessly link the old with the new, as well as providing easier access. A quick, efficient, and comfortable public transport network links Camborne, Pool, Illogan and Redruth and connects the surrounding villages with the towns. The network also provides reliable linkages to the renewed and busier railway stations.

This is mere rhetoric, fine words and wishful thinking that mask a flawed plan. Road 'improvements' will make it easier to use cars in the area, whether for internal traffic or to encourage people from outside the area to travel to visit the 'sub-regional' centre.

Camborne

There is a real sense of arrival when approaching Camborne from both the A30 and the Railway Station, with new high quality housing and employment uses sitting comfortably within the landscape. New parks and tree-lined avenues complement the fine old civic buildings and the town centre is bustling and attractive, with a fine mix of the new and old, providing a quality retail experience for local residents, as well as its neighbouring villages.

The new housing sits uneasily with and overwhelms the original vernacular architecture. Gentrification of the town has changed its character irrevocably.

Pool and Illogan

Travelling into Pool, there is a real sense of renewal, with derelict land replaced by high quality development. The winding gear of South Crofty Mine provides a distinctive beacon, a celebration of the past in an area that looks to the future. New development reinforces and enhances Pool's role as a commercial, education and leisure hub, with the heart of Pool recreated as a community in its own right.

It would be interesting to survey actual road-users or local residents to test whether this 'real sense of renewal' exists beyond the offices of CPR Regeneration Company! New development has overwhelmed the existing community of Pool, the process of gentrification resulted in Pool now being indistinct from Poole, Peckham or Portsmouth; informal green areas are replaced by development and an urban park. With new traffic generating developments in the area, traffic levels have increased considerably. Pool now has the dubious status of having three major roads running across the area with a consequent disastrous loss of quality of life.

Much better links have been created between Pool and Illogan, breaking down old barriers, enabling Illogan to benefit from Pool's facilities whilst retaining its individual character.

The biggest barrier between Pool and Illogan is the A30 bypass.

An alternative interpretation of the vision

There is a sense of loss and lost opportunities. With green areas developed and urbanised, extra traffic from other parts of CIR and visitors, there is a distinct loss of tranquility. New out of place high-density buildings abound, with wider roads running through the area, resulting in a profound feeling of being in a world removed from the best characteristics of

Cornwall's small town environment. There is a sense of a place destroyed and local people increasingly feel strangers in their own locality.

Lost opportunities are common, for example the chance to seriously reduce car use, so making CIR an exemplar of sustainability, has been abandoned. The retention of existing green areas, which ensured a sense of rurality in an urban setting, rejected.

Green space is apparent throughout the area, providing green links within Pool and Illogan to their neighbouring communities. At the centre of these reinvigorated communities is Heartlands Park, offering green space and heritage attractions of the very highest quality, as well as a backdrop for new homes and a range of employment space. The buildings are stunning and an exemplar of environmental design.

The vision conveniently ignores the fact that there are already green areas within the 'urban' area. Heartlands is a good example. Most of the land in this proposal is already green, consisting of (unused) farmland. To imply that the community will gain additional green space is incorrect. Turning part of the area to an urban style park is not necessarily the best approach.

Redruth

When traveling into Redruth one of the most noticeable changes is that Chapel Street has now become the main entrance to the town, providing a high quality entrance, reducing congestion and providing easy access to the retail centre.

So a rejuvenated 'high quality' Chapel Street will be an 'entrance' for additional car traffic?

Objectives

Identity - To have the benefits of the facilities and services of a substantial urban area, whilst ensuring Camborne, Pool, Illogan and Redruth each continue to have their own particular identity

Why does the area have to become a substantial urban area. In reality the alleged benefits are urbanization are used to justify the unsustainable housing targets. There are negative aspects, which are not listed – loss of semi-rural feel to area; loss of green space; limited garden areas.

Regeneration - To bring regeneration benefits to the present communities and new residents alike. This will include an improvement to the image of the place and to everybody's everyday environment.

What does improvement to the image mean? Does it mean the loss of existing areas of 'green' and 'brown' land which contribute to the character of the area?

Economy - To sustain, grow and diversify the economy by nurturing existing businesses, promoting entrepreneurial activity and attracting investment to achieve at least 7000 additional jobs. This will include providing more rewarding and higher skilled jobs, with a corresponding improvement to the skills of local people and to the capacity of the workforce

But the new jobs are to meet the needs of an expanded population not to upgrade the local workforce and enable it to attain higher earnings.

Housing - To provide housing at a level consistent with the level of employment and the need for housing arising from the changing household structure, making a significant

contribution to the need for affordable housing, achieving a net increase of up to 9,400 homes with a balanced mix appropriate to the needs of the communities in the future.

This does not address the fact that most of the extra housing is not to meet local housing need.

Accessibility - To achieve greater and more inclusive accessibility to jobs, shops, health, education, leisure, recreation, green space and community facilities through a combination of additional provision of jobs and facilities, improved public transport and better opportunities for cycling and walking.

Additional jobs and facilities are to meet the needs of an expanded population. The aim should be provide additional jobs and facilities to meet the needs of the existing population. Proposals to improve public transport and opportunities for cycling and walking are offset by other policies, which encourage car use.

Employment growth and housing provision

The approach to housing provision favoured by the Council is to provide the amount of housing that fits with growth in jobs and meets household demand from changing household size from those already living in the area.

This does not address the fact that extra housing is not to meet local housing need. Economic growth should be geared to providing better jobs, not simply increasing jobs.

If past rates of job creation were to continue over the 20 years of the plan period, this would deliver 7000 additional jobs. This is still an aspirational economic target, but is considered to fit with the aims of various partners working to promote economic development in the area. If commuting patterns remain unchanged, this would give rise to the need for 10,300 homes²⁸. ²⁸ This is based on an average of 0.9 economically active persons per household, as well as 2500 homes required to house the existing population in smaller households (ie 2.33 persons per household in 2001, to 2.04 persons per household in 2026)

Was 6000 jobs before! Why the change?

There have been periods in Cornwall when the population has grown but job growth has been low. In the First Alteration of the Structure Plan, the County Council stated 'The underlying assumption of the Approved Plan in relating population growth to employment opportunities has not held good'.

To concentrate on job numbers ignores the need for better-paid jobs. An economy, which grows jobs, is not necessarily as desirable as one where job numbers remain static yet as productivity increases, earnings rise.

Job growth has occurred, yet this has simply kept pace with population growth rather than fundamentally changed the economy.

Comparison with other places shows that this rate of self containment could be higher and an increase in the number and range of jobs in the area has the potential to reduce the numbers of people currently commuting out of the area, thereby increasing self containment in the Camborne, Pool, Illogan and Redruth area. An increase in self containment to a similar level as Truro (70%) (ie, an additional 900 economically active residents of Camborne, Pool, Illogan and Redruth living and working locally) gives rise to a housing requirement for **Camborne, Pool, Illogan and Redruth of 9,400 dwellings**

29 Self containment for work is the number of working residents

This is a bit of a red herring. Self containment is probably not possible. In terms of travel, self-containment does not necessarily mean less travel. It is useful to examine the average distance traveled by those in work in different areas. In 2001, the average distance traveled in CIR was 13.6 km. This compares to the Cornish urban average of 15.7km and an England and Wales figure of 12.8km. Truro has a self-containment rate of 72%, yet the city also has considerable commuter traffic, as a significant proportion of jobs in the city are filled by people living elsewhere.

CIRs self-containment is lower than number of settlements which are actually smaller in terms of population- Penzance 73%, Truro 72%, Newquay 69%, Bodmin 69%, Launceston 67% and Helston 67%.

The idea of a self-contained community, where people live, work and play within the same area sounds like a good idea, but there are significant factors, which operate against this theory.

In the context of the RSS Panel Report and having to accommodate more housing, it is the Council's view that this is the appropriate amount of housing that should be directed to Camborne, Pool, Illogan and Redruth.

Quite the give away statement! KDC should have produced a policy that met local requirements and aspirations.

3.12 The implications of these different levels of housing growth are set out in the table, Figure 9, below. Whilst the Council is interested in people's views on these, the decision about how much housing will be built in the area may not be within the Council's control because this will be decided by the Secretary of State. Nevertheless, consultation responses to the AAP will assist the Council in formulating a response to the RSS, and hence the Council is interested in your views on the three growth scenarios.

The following is a critique of the points raised comparing the three options

No of jobs required to balance homes and jobs

There is something of a circular argument here; jobs are needed to support the extra population, A very low provision of housing could act to constrain the local labour market pool, and hence the economy.

Really? So is Cornwall dependent on an ever-increasing population to assist economic growth? Obviously this is not sustainable and indeed is a rather simplistic analysis of how economies work.

There is an obsession here with job numbers rather than job quality. It has been possible during a period of economic expansion across the UK, to create jobs, yet the quality of new jobs is such that earning levels persistently remain low. Neo-liberal economic theory might suggest that by continuously expanding the labour supply, earnings levels are dampened down.

Travel to work patterns

The plan, following current planning orthodoxy, focuses upon 'self-containment', locating housing close to employment, with the assumption that travel to work will be reduced. Yet

there is little evidence to support this. The interrelationship between where people live and work is far more complex.

Housing demand

Demand for housing in Camborne, Pool, Illogan and Redruth is currently very low. The 'Housing requirements study' shows there is a total net 5 year requirement for 1250 dwellings, of which the demand for open market is 420 dwellings. Rolled forward to cover the 20 year plan period, this would be in the region of **5000 dwellings**, (of which, there is a demand for 1680 open market housing).

Of these 5000, 2500 are to meet changes in household size. (Though our estimates are for a figure of 2100).

Housing need/requirement data is based on an expanding population in line with past trends. Alternative scenarios with a stable population would lead to a lower need/demand. We estimate a maximum.

The table below summarises the various options, taking account of estimated requirements and additional housing to meet targets. What is apparent is that current demand/need figures indicate that two-thirds could not be met on the open market. The table also shows the percentage of new housing, which would be additional to 'need/requirement'

Table 1: Dwelling options

Option	Total	Affordable	Open market	Cater for in migration/	As % of total	Additional to need
	5000	3320	1680			0
1	6000	3320	1680	1000	17	20
2	9400	3320	1680	4400	47	88
3	11100	3320	1680	6100	55	122

The table below shows a total of 6 options. The first one is based on estimates of demand arising from changing household structure. The second adds in an additional figure for other needs. We note that changes to planning policy would address the impact of properties being bought for second home/investment use, which would have an impact on dwelling numbers required. In particular the reduction in dwellings for these uses elsewhere would reduce the numbers displaced from rural areas to CIR.

Table 2: Dwelling options – full set of options

Option	Total	Local need/requirements		Cater for in migration/*1	As % of total	Additional to need
		Affordable	Open market			
CoSERG 1	2100	1400	700	0 *1		
CoSERG 2	3000	2000	500	500 *2	17	20
KDC 1	5000	1675	825	2500 *2	50	100
KDC 2	6000	3320	1680	3500 *2	58	140
KDC 3	9400	3320	1680	6900 *2	73	276
KDC 4	11100	3320	1680	8600 *2	77	344

*1 Assumes maximum of 2100 dwellings to accommodate household change

*2 Assumes maximum of 2500 for household change. All figures above this to meet in-migration.

*3 Assumes pro rata affordables and unaffordables

However, the housing requirements study is based on past trends of the housing market and there has been a very constrained supply of housing in Camborne, Pool, Illogan and Redruth, with very few greenfield allocations over the last 10 years.

This suggests that as might well be expected, extra housing supply leads to greater demand. If you build more houses, they will be bought.

The table below sets out the additional population that would be expected under the different scenarios. Each additional household would have significant impacts in terms of carbon output and use of resources.

Table 3: Potential population growth

	Dwellings	Non-local need	Population
KDC 1	5000	2860	5800
KDC 2	6000	3860	9000
KDC 3	9400	7260	15000
KDC 4	11100	8960	18300

Assumes local need equals 2140 dwellings.

Affordable housing

Of the total net 5 year requirement, the affordable housing requirement is calculated to be 830 homes. This is 66% of the total housing requirement. This leads to an overall requirement of 3320 affordable homes over the 20 year period.

Table 4: Affordables under Kerrier's options

Option	
1 (6000)	If 20% of future housing provision is affordable, this scenario could deliver up to 1200 affordable homes
2 (9400)	If 20% of future housing provision is affordable, this scenario could deliver up to 1900 affordable homes.
3 (11100)	If 20% of future housing provision is affordable, this scenario could deliver up to 2220 affordable homes

If current requirements are for 3320 affordables why build so many unaffordables?

Current Government policy, which sees the provision of developer led affordable housing, is flawed.

Greenfield land take

There is potential for about 5600 dwellings within the urban area of Camborne, Pool, Illogan and Redruth.

This is misleading 'so-called brown land' in that it implies that the 5,600 dwellings will not be built on greenfield sites. Analysis of available data indicates that half of the land identified in the Urban Capacity Study in the 'urban' area is greenfield.

Impact on environmental assets

It is possible to accommodate this level of development whilst avoiding nationally and locally important environmental designations. That is not to say that there will not be an impact on biodiversity. In any case, policies in the AAP should aim to secure a net gain in biodiversity from development. Depending on the location of urban extensions, there could be the loss of the best and most versatile agricultural land (ie Grades 2, 3a and 3b).

The idea that if development does not use 'nationally and locally important environmental designations' it is acceptable is flawed. We have to look at the total environment if we are to act in a sustainable way.

Table 5: Delivery

<p>1 (6000)This scenario is the most deliverable. It most closely resembles the housing demand identified in the <i>housing requirements study</i>.</p> <p>This scenario is considered to be achievable.</p>	<p>Average build rate of 300 dwellings per year. This is double recent build rates of 150 dwellings per year, (100 on brownfield and 50 on greenfield).</p>	<p>However, there has been intervention by public agencies to promote the development of a number of large brownfield schemes for housing, some of which now have planning permission.</p> <p>Therefore, there is evidence to suggest that completions on brownfield sites could increase over the plan period.</p>	<p>Provision of 400 dwellings on a greenfield extension has the potential to raise completion rates, by offering an alternative to the urban sites. Under this scenario the greenfield site(s) could be phased to a later time period in the plan.</p>
		<p>Where are these large brownfield schemes?</p>	
<p>2) 9400 It is considerably higher than the housing demand identified in the <i>housing requirements study</i>.</p> <p>This scenario is less deliverable than housing growth scenario 1.</p>	<p>Would require an average build rate of 470 dwellings per year. This is three times recent build rates of 150 dwellings per year.</p>	<p>Even if all of the brownfield potential is developed (5600 homes at 280 dwellings per annum), there would be a need to maximise completions on greenfield sites. One way of doing this would be to identify a number of extensions in order to maximise the cumulative effect of multiple concurrent developments.</p>	<p>Even if greenfield completions were able to start in 2013, to achieve a build rate of 340 dwellings per annum on greenfield sites, this would require between 6 and 7 developers (or different parcels of land) delivering 50 - 60 dwellings per annum. This is in a context where there have been no completions by volume house builders in Camborne, Pool, Illogan and Redruth for several decades.</p>
		<p>The 5600 will not all be on brownfield sites</p>	<p>Indicates a problem of relying on developer led provision</p>
<p>3) 11100. It is considerably higher than the housing demand identified in the <i>housing requirements study</i>.</p> <p>This scenario is less deliverable than housing growth scenario 1 and 2. very difficult to deliver.</p>	<p>Would require an average build rate of 555 dwellings per year. This is almost four times recent build rates of 150 dwellings per year.</p>	<p>Even if all of the brownfield potential is developed (5600 homes at 280 dwellings per annum), there would be a need to identify a number of extensions in order to maximise the cumulative effect of multiple concurrent developments.</p>	<p>Even if greenfield completions were able to start in 2013, to achieve a build rate of 470 dwellings per annum on greenfield sites, would require between 8 and 9 developers (or different parcels of land) delivering 50 - 60 dwellings per annum. This is in a context where there have been no completions by volume house builders in Camborne, Pool, Illogan and Redruth for several decades.</p> <p>This makes this scenario very difficult to deliver.</p>
		<p>The 5600 will not all be on brownfield sites</p>	

There are a number of questions relating to the build rates issue.

How likely is it that such rates could be achieved in an economic downturn?

If built yet not sold (due to low local demand), the additional dwellings would be sold to people elsewhere in the UK to ensure a return for the developers, thus proving that 'demand' exists, when that demand is induced.

The location of housing

Both land within the urban areas of Camborne, Pool, Illogan and Redruth – so-called brown land – and beyond the present built up areas of Camborne, Pool, Illogan and Redruth – so-called green land – will need to be used.

The areas within the urban area are all not brown! About 50% of the land in the housing capacity study for housing is greenfield.

3.18 There is a great deal of vacant, derelict or underused land within the current urban areas that needs to be better used. The redevelopment of this land is part of the regeneration that is needed. There will be different demands on land as the economy and the population grow. There is in any case a need to maintain a mix of uses consistent with vibrant, enjoyable and sustainable urban areas. Housing will always be a major part of the mix of development within the urban areas however.

Where? There is too much reference to brownfield land. We also have a process of creating brownfield land. For example, if the existing leisure centre site is redeveloped, it will be classified as brownfield. It would indeed be brownfield but it is currently in use and should not be considered as brownfield. [Refer to brownfield in themes section].

Where is the underused land in the area? How is underused defined?

3.20 It currently seems that about 5600 dwellings could be created through the redevelopment of parts of Camborne, Pool, Illogan and Redruth, within the urban areas.

The term within the urban area is misleading. While some sites are within the urban area, many are on the edge and therefore in open countryside. A number of sites within the 'urban area - the misnamed Boiler works site, the Rosewarne, Reskadinnick Road site - are greenfield and cannot be defined as urban. The Tuckingmill 'urban village' site is over 50% greenfield and is in essence part of the rural zone of Tuckingmill.

Where are these redevelopment sites? As many of the sites allocated are not brownfield they cannot be thought of as sites to be redeveloped. Boiler Works and Rosewarne for example.

The total figures in previous plans, including sites identified in the urban capacity study, do not add up to 5600. Analysis of sites gives a figure of approximately 3500. It can only be assumed that the difference is made up of: sites already completed; and, potential windfall sites arising as some land currently in use is redefined as brownfield – Redruth Rugby ground, the existing Leisure Centre?

3.26 Together with land within the urban area, these locations could provide more development land than is needed to meet the identified housing requirement, if this is set at 9,400 dwellings. There is enough land to meet the high scenario of 11,100 dwellings.

It is not a good move for the District Council to admit that there is sufficient land available. The Secretary of State will think the area can accommodate the extra housing, and using the misplaced belief that housing is a driver of regeneration will consider extra housing is a good idea.

It would be far better to argue against the targets on the grounds that: they are unsustainable; will not meet local need; will reduce the quality of life for local communities; reduce community cohesion; and, will not assist in improving the economy.

Options for the location of housing

3.29 The current expectation from the Council's approach to the level of housing provision and the amount of housing potential within the urban area is that about 3,800 dwellings will be needed from green land on the edge of the urban areas.

The potential impact of each option for development on the area is set out below.

- Contribution from housing opportunities within the built up areas
- Provision of greenfield housing in substantial sites aiding delivery of infrastructure
- Spread of housing sites for market delivery and choice
- Substantial consolidation of Camborne, Pool, Illogan and Redruth
- Extension of Camborne, Pool, Illogan and Redruth into open countryside
- Requirement for road links
- Concentration of housing close to either existing or new centres

It would be possible to assess each option using these criteria, calculating whether one option is better than another according to the criteria. Yet the fundamental point is that getting bogged down in this process misses the flaw in the plan, namely, attempting to meet unsustainable housing targets. However, there are some aspects requiring comment.

Contribution from housing opportunities within the built up areas

Although using sites in the 'built up' areas sounds environmentally friendly, many of these sites are in fact green areas and are important resources for the local community.

Provision of greenfield housing in substantial sites aiding delivery of infrastructure

Although there may be an argument that large sites make it easier for certain infrastructure delivery, the disadvantage is that they have more of an impact on the local community. Whereas a small development can be integrated within a community, a large one, particularly in a Cornish context, can have a significant impact.

Spread of housing sites for market delivery and choice

It is likely that given the location of the greenfield sites, outside the 'urban' area, that if allocated these would be more favoured by developers than some of the other sites.

Substantial consolidation of Camborne, Pool, Illogan and Redruth

There is an implication here that consolidation is of benefit; the rationale being that it assists accessibility and additional infrastructure can be created rather than strain existing services. Yet any additional infrastructure would be an extra cost.

Extension of Camborne, Pool, Illogan and Redruth into open countryside

All of the options result in extension into the open countryside.

Requirement for road links

The fundamental flaw here is that improving accessibility of any development will automatically lead to increased opportunity to travel.

Concentration of housing close to either existing or new centres

The rationale for concentrating housing near centres is plausible; the theory being that people will use local centres and hence travel less, yet in itself does not lead to more sustainability.

Shopping and town centres

3.34 The evidence from the retail studies undertaken for the Council is that there is currently:

- a limited retail offer in the existing town centres, particularly in comparison goods
- domination of convenience spending by superstores
- loss of confidence in town centres amongst existing and potential future retailers
- low retention of local expenditure, with competition from more attractive centres such as Truro, and from out-of-town stores such as at Hayle.

It is probable that the dynamics of the retail economy will continue to lead to people travelling to other centres to shop. This partly reflects the fact that certain goods will only be available from what are termed higher order centres such as Truro. It is not feasible that all urban centres will have the same range of retail facilities and neither should policy seek to achieve this. Even if a centre can provide goods, this does not mean that people will not travel to other centres to purchase such goods. People have got used to travelling to other centres, it is part of the shopping experience, indeed, retail stores in different centres compete for such trade. Such movement is of course largely a consequence of the availability of car transport and it is facilitated by 'improvements' to the road network. Greater accessibility to adjacent centres also means greater accessibility to other centres. This does not mean that land use planning does not have a role to play. However, developments such as that at Hayle, which encourages travel from a wide area and also detracts from the existing town centre make the situation worse.

With rapid changes in the retail market due partly to consumers desire to obtain cheaper goods and partly to the impact of ICT, is it wise to continue to base retail policy on the belief that people will be traveling to shop? It is also more sustainable for society if people can shop on using the internet. Retail centers then would either fulfill a local needs function – shops serving the local community or act as distribution centers. It is possible in this scenario to envisage the town centres of Camborne and Redruth with some retail at Pool, operating to serve the local area, while the current out of town facilities serve a wider area, though with limited visitors, being largely reliant on internet sales.

- few opportunities to create large shop units that would be needed if national multiple retailers were to be attracted to locate in the area.

There is a dilemma for policy makers here. Large multiple retailers invariably attract consumers from other areas thus generating additional traffic.

3.35 Retail studies have estimated that there will be an increase in available spending from the residents of Camborne, Pool, Illogan and Redruth to support an increase in the amount of convenience and comparison shopping floorspace. The amount that could be supported by 2026 is estimated at 20,000 sq m.

Extra spending is of course partly a reflection of an expanded population. Additional spending power however, does not necessarily translate into a need for more retail capacity within the area. The growth of online shopping would and probably will lead to a need for lower capacity.

3.36 Studies undertaken or underway of town centre opportunities suggest that there would be the opportunity to physically accommodate retail developments with about 5-6,000 sq m within each of the town centres of Camborne and Redruth. There are currently no firm proposals however, and no known developer interest.

The problem with the current dependence upon developer led regeneration combined with the power of large retailers, is that they have the ability to determine where shops should be located, which may not be in the best interests of the wider community. As with other planning issues, it is one where government action is required.

3.37 The current operator of a superstore in Pool has informed the Council that it wishes to extend its existing store.

One issue, which the plan does not refer to, is that planning authorities are rather powerless, particularly when it comes to the retail sector. This statement illustrates the fact that local authorities have no means of effectively planning for an area, if Tesco expands and closes its other stores, KDC can do nothing.

3.39 **Option RA** continues the current and competing roles of Camborne and Redruth, with additional retail space directed to the two centres in a similar proportion as the existing floorspace and according to the opportunities that can be created that would be attractive to developers and retailers. Current evidence suggests that Camborne and Redruth could not accommodate all of the additional retail potential however, and this option includes the provision of further retail development at Pool – probably about half of the overall potential, or up to 10,000 sq m. Under this option the development at Pool should be identified in the strategy but phased to take place in the later part of the plan period, after 2016, allowing Camborne and Redruth to develop in the meantime and as more jobs and housing arise.

The 'problem' only exists if an excessive increase in population is allowed.

3.40 **Option RB** is the creation of a retail centre at the centre of the functional Camborne, Pool, Illogan and Redruth area – that is, in Pool – and as part of a proper town centre with commercial, leisure and cultural uses together in the most accessible location. This could provide all of the additional retail capacity that is currently believed will be available up to 2026. Such a development would detract from further investment in the existing centres.

Such a move would generate additional traffic and be to the detriment of the two town centres.

3.42 It should be noted that a further option that might appear possible would be to promote complementary rather than competing roles for Camborne and Redruth town centres. This would involve giving primacy to one centre, directing all of the retail growth there to achieve a step change in retail offer, whilst the other centre took a local role or developed as a specialist centre. Camborne might be the enlarged town centre containing the national multiples and serving a wide area whilst Redruth might develop as an arts and cultural centre. This role is showing first signs of emerging with the former Grammar School already a centre for creative industries that could evolve more of a visitor and possibly retail role.

Again this would lead to additional traffic generation and be to the detriment of Redruth town centre. It would be desirable to retain two local shopping centres. Unfortunately, the development of a competing retail centre at Pool has undermined the development of a sustainable retail policy for the area. Whilst the development of certain retail stores at Pool could have been appropriate, the location of stores such as Tesco has created problems for policy makers.

3.43 As another variation on this alternative, the Redruth Corridor Study, set out development opportunities that could be created in Redruth supporting a stronger role in the future, though developer interest has yet to be explored.

3.44 Whilst the 'complementary centres' alternative might be an interesting principle to explore, the practical constraint is that neither of the existing town centres alone appear to have the capacity to provide for all or even half of the retail growth that the future population could support, and so Camborne, Pool, Illogan and Redruth would simply miss out on the achievement of a significantly enhanced retail offer.

Leaving aside the issue of catering for a larger population, there is a need for a rethink of retail policy to take account of reducing travel through providing local facilities and increasing the retail offer through internet access to stores.

Location of offices

3.45 There is very little purpose built office space within Camborne, Pool, Illogan and Redruth at present, with the Council offices amongst the most significant current provision. Recently however, the Tolvaddon Energy Park development which provides office space within a high quality business park environment, directly accessible from the A30, has been successful with 9200 sq m of office space now developed and a further 6700 sq m with planning permission. The work on the potential for the economy to grow identifies growth in sectors that will require additional office space. Taking account of what is already built and has planning permission, plus the need to relocate some employment land from sites that are to be redeveloped, it is estimated that there will be a requirement for a further 33,500 - 37,800 sq m of office space by 2026.

3.47 Option OA directs all of the office development to Pool, potentially as part of a new commercial centre with offices related to shops in the core of Camborne, Pool, Illogan and Redruth.

Pool might well be served by public transport but the reality of concentrating offices there would be to encourage greater levels of commuting. Indeed, the East West Highway and 'improvements' at East Hill and Dudnance Lane will facilitate that process.

Option OB

3.48 Option OB directs new office space in locations close to the A30 and to opportunities in Redruth town centre, with the balance of office development at Pool.

One potential impact of location close to the A30 is that commuting may be encouraged. E.g., looking at the current Tolvadden site, it is probably quicker to drive there from Truro or Hayle than to use public transport to get there from Camborne. Indeed, how many people there drive in from areas outside CIR compared to those who live locally?

Location of industry, distribution and storage

3.50 Camborne, Pool and Redruth have a history of employment in industrial activity, and whilst some sectors that have provided employment to date are declining, the overall requirement for industrial space (use Class B1c and B2) and storage and distribution (B8) is projected to grow. Taking account of the need to relocate some employment land from sites that are to be redeveloped, plus what has already been built since 2006 and has planning Permission 31, the economic growth scenario indicates a likely requirement for between 14,000 and 20,500 sq m of B1c/B2/B8 accommodation by 2026.

3.51 It is noted that there is potential for 14,600 sq m on existing industrial estates or on brownfield land within the urban area which would satisfy requirements at the lower end of the range (ie 14,000 sq m) including:

- Barncoose
- Cardrew

3.52 However, at the upper end of the range (ie 20,500 sq m), there is a shortfall of about 6,000 sq m, which could be provided at:

- Wheal Harmony (6700 sq m); or
- Tolvaddon (9,700 sq m)

We note that of the sites referred to as potential employment allocations, three-quarters was greenfield.

3.54 The likely implications of this scenario are as follows.

- An oversupply of about 11,000 sq m of B1c, B2 and B8 in the interests of providing a mix of sites for the market
- maintaining a mix of uses within the urban area, and of employment opportunities being available locally, which may assist in reducing travel demand.

Probably not. The idea that by making employment opportunities available locally, they will necessarily be taken up by local people is unrealistic.

(vii) Illustrative Spatial Strategies

3.55 The role of the AAP is to establish an overall strategy for the coordination in space and time of new development. Options have been set out for some of the choices available in dealing with major land use activities and pieces of development. The strategy will be a combination of different choices from these together with material about how to make the changes happen and to get the best from the development to meet the plan's objectives.

3.56 In this section four different ways to combine the retail, office and greenfield housing development options are set out. These are not exhaustive – there are many more potential permutations. They are illustrative of what the strategy could be however, and they are chosen to demonstrate the range of possibilities. The illustrative strategies presented here are those where there seems to be the greatest complementarity between how different types of activity are distributed however. For instance there could be overall benefit in locating office and retail development together, and none of the strategies presented choose retail and office options that do not seem to work well together. This choice could be made however.

3.57 The illustrative strategies are described and the implications of each of the patterns of development introduced.

Our analysis below looks at the criteria used to assess the options.

Maximum use of land within the built up area.

It is incorrect to refer to many of these sites as within the built up area. Most are on the edge or are clearly rural. The Tolgus site was in a previous plan an area of local landscape significance. We are concerned at the misuse of terms in an attempt to meet government imposed targets.

Reinforcement of existing town centres

In theory fine, yet in reality consumers may choose to shop elsewhere and frequently do, particularly with other centres competing and improved access for car use. Minimising travel to other centres is a difficult issue to resolve.

New housing close to existing and new centres supporting existing and new facilities and services.

In theory fine, yet in reality users may choose to go elsewhere and frequently do, particularly with other centres competing and improved access for car use. Minimising travel to other centres is a difficult issue to resolve.

Large greenfield sites with potential for contributions to community infrastructure and affordable housing.

There is a fallacy with this government inspired developer led approach. To be successful, developers will seek to obtain the highest return from their sites; hence they will require a significant level of unaffordable housing. Yet the community requires the opposite.

Industrial space distributed within the urban area, retaining accessibility and mix of uses.

People may and will, live in one area and work in another. There are a number of factors, which influence this process.

Transport infrastructure

4.3 For Camborne, Pool and Redruth, the LTP outlines a programme of measures for addressing regeneration and congestion issues in the area. This draws on previous transport strategy work carried out in tandem with work on developing the regeneration action plan for the area by the URC. The key proposals are shown on the map below and summarised in relevant sections below. The measures are seen as critical to making sure the overall strategy works, and are focused on ensuring that people continue to be able to travel to and within Camborne, Pool, Illogan and Redruth, but in an increasingly sustainable way. The overall goal should be to ensure that development for economic growth is able to take place, but without an increase in problems associated with traffic growth. This is in-keeping with Cornwall County Council's aim to reduce car dependency in the Camborne, Pool, Illogan and Redruth areas by 20%.

Existing policies allow and encourage greater car use not less. The EW link road is a good example of this. If the aim was to have a more sustainable transport policy, then investment would be made in a cheap, convenient, co-ordinated public transport system. Policies to encourage walking and cycling will have a limited impact on travel. People are not going to walk or cycle from Redruth to Pool or Camborne to work, and the idea that people would do their weekly shop in this way is simply unrealistic.

*It is also simplistic to focus on walking and cycling when significant numbers of people are and are expected to travel in and out of the area from other settlements. A number of existing and planned developments are dependent? on people traveling by car. The new leisure centre is a good example – where in the DLIP it refers to 300,000 within an hours drive. Hence it will encourage people to travel there by car. Retail shops at Pool attract people from other areas. How far do people travel to visit Tesco Extra? We don't know, yet travel patterns created by the retail sector can have a significant impact on traffic levels. The EW highway and Dudnance road widening will facilitate significant extra traffic into the area. This would easily outweigh any reduction in local traffic even **IF** local people were to walk!*

4.5 One of the areas where the greatest physical change is proposed is Pool. This will require improvements to the transport network serving this area. The strategy already in place with the LTP includes:

- Improvements to the north-south corridor from the A30 trunk road into the heart of Pool (including East Hill Junction)
- A new East-West Link Road to serve the regeneration areas in Pool
- Environmental enhancements to the A3047

4.6 A Major Scheme bid has been submitted to the Department for Transport for these two proposals and the Transport Authority (Cornwall County Council) is awaiting a decision.

As we have stated in previous submissions we do not consider the expansion of road capacity to be appropriate. Funds should be invested in an effective, cheap and convenient public transport system.

4.7 In addition, cycleways and footways will be provided along the A3047 route, together with associated streetscape and public realm improvements to create a high quality boulevard access.

Although walking and cycling is a 'good thing', and should be encouraged, it is unlikely to make a significant impact to reducing car use in the area. A more sustainable alternative to the East-West highway might have been a walking/cycling route from Redruth to Camborne, linking with north/south pathways.

4.11 An initial assessment has been undertaken which indicates that none of the urban extension options perform particularly better or worse than the others in terms of their impact upon the highway network. Despite this, the modelling did suggest that, by 2026, certain junctions within Camborne, Pool, Illogan and Redruth's transport network will have reached capacity or will be over capacity - these are primarily based on the A3047 and the connections onto the A30.

The network will reach capacity due to over-development and excessive car use.

4.12 However, these junctions where capacity issues would be likely to arise are also being assessed for their ability to have their capacity increased through localized improvements to their layout and operation. This leads the Council to the initial conclusion that whilst the current transport infrastructure might struggle to cope with the proposed level of development, opportunities exist to increase the capacity, enabling future growth to occur without having an adverse impact on the highway network. Further, detailed work is planned between the Council and its partners to ensure the correct measures are planned and implemented, depending on the level and location of development that is included in the strategy.

There is a need to reduce car use, therefore increasing capacity is not appropriate. The policy should be to reduce demand for car use.

4.13 In addition to the improvements in the LTP, and that may be required to accommodate the levels of growth, there is also a recognized need to see how improvements could be achieved to the transport links between Camborne, Pool, Illogan and Redruth and the south of the District and beyond.

There is a need to reduce car use, therefore increasing capacity is not appropriate.

4.15 The increased travel demand resulting from the regeneration and growth of the Pool area will improve the transport case for increased train frequencies and the possibility of a new station at Pool. This is something the Council would support provide there were no adverse affect on the Camborne and Redruth stations or other rail services. The Council will work with partners and the rail industry to examine the prospects for a station at Pool and will consider identifying a safeguarded site.

It is unrealistic to assume that increased travel 'demand' will feed into more use of the rail network. The focus on providing additional road space will ensure that the dominant form of travel will be by car. Rail is also probably not the most effective form of public transport to consider, particularly when looking at internal CIR travel movements. Would it be practical for an individual on the north side of Redruth wishing to shop at Pool to travel to the railway station in Redruth and then travel to a new station at Pool? Rail is suitable for some trips particularly if both the stations are close to the activity/home and where bulk shopping is not involved. Generally in Cornwall, rail is more useful for long haul trips.

There is also the point, why would people travel by rail when there is a new road for them to use? Rail does not offer good linkages with many areas within CIR.

Improvements to bus services and facilities

4.16 Improving bus services and facilities in the Camborne, Pool, Illogan and Redruth areas is seen as key in ensuring that there are good quality and viable alternatives to car travel. Improvement measures include:

- Working with the bus operators to improve bus services from peripheral residential areas, providing access to the main employment and education areas, and to the town centres, and providing an interchange point for rural and feeder routes to core bus services between Camborne, Pool and Redruth and to other locations.
- Improving integrated bus and rail ticketing
- Improved bus shelters and enhanced bus information systems, including real time information.
- Developing a high quality strategic bus corridor along the A3047. This is likely to include new bus priority measures, improved bus waiting and interchange facilities, and potential improvements to the scope and/or frequencies of services. These improvements will need to be developed and implemented in partnership with the main bus operators in the area. (the full benefits of infrastructure improvements on this corridor are dependent on the completion of the new east-west link road).

Why a corridor? What is required in the area is a bus service which links the main residential, retail and employment areas. A loop perhaps.

4.17 In providing public transport access to the Combined Universities in Cornwall (CUC) in Falmouth as well as commuter flows between the towns, enhancements to the Camborne, Pool, Redruth - Falmouth corridor include:

- targeted publicity and marketing (particularly at the colleges and major employers);
- real time SMS information; and
- ticketing initiatives aimed at major employers.

To get more people to transfer from car to bus requires stronger measures, a good public transport system and a change in attitude and lifestyles.

Health facilities

4.23 The Council has worked with the Primary Care Trust to assess the future needs relating to healthcare. All existing health centres and GP surgeries are at capacity. Therefore, an additional 9,400 homes would require in the region of an additional 12 GPs. There are various proposals, at different stages of development, which suggest additional capacity could be created; one such proposal is presented on a masterplan for the Pool area, which provides the opportunity for a large health centre within Pool, which could accommodate much of the required growth in capacity.

Would not this proposal result in additional trips being made from other parts of CIR? Again, it is not sustainable.

Green infrastructure

4.26 Green space plays a vital role in both helping to shape Camborne, Pool, Illogan and Redruth, as well as providing recreational opportunities for its residents. It is important that Camborne, Pool, Illogan and Redruth's green infrastructure is maintained and enhanced. There will be a need to create additional parks and play areas to cope with the proposed increase in population.

The proposed housing and related developments will result in the loss of significant green areas.

'Greening' can and often does result in the loss of existing informal areas with significant biodiversity and value. Turning such areas into municipal parks and lawns is inappropriate.

4.27 Camborne, Pool, Illogan and Redruth currently have a range of open space provision, although much of it is in need of renewal. Some major advances are already being made, with the recently refurbished Tuckingmill Valley Park, which has won various awards, and 'Heartlands' which is about to be developed within the centre of Pool, which will create a 6ha park of national significance. In addition, Camborne, Pool, Illogan and Redruth sits within a high quality rural landscape, so it is important that people are able to enjoy these natural resources. Enabling this to happen includes ensuring the network of cycling, pedestrian links and bridleways are maintained and enhanced.

In reality, Heartlands is designed to attract significant numbers of people to the area, which runs counter to the idea of a green area for the community.

Leisure

4.29 It is an aspiration of the URC for destination leisure and sport orientated development that could accommodate the relocated Carn Brea Leisure Centre. Their vision is for a leisure development that would be of a quality and scale and containing the type of sport and leisure activities that will attract residents and tourists from other parts of Cornwall³². Funding has yet to be secured for this development.

This proposal exemplifies a fundamental paradox in the plan. Throughout the plan there are constant references to the need to reduce travel by car. Measures such as improving access to walk and cycle, public transport links between housing developments and facilities, the densification of housing developments to locate more people within range of facilities and transport links. The vision would appear a future of self-contained communities, where people walk or cycle to the local shops, employment and schools and leisure facilities, etc. Yet at the same time there are proposals, which encourage car travel. It is implicit that the new leisure centre should attract people not only from the areas within CIR, but from further afield [(300,000 within an hours drive). Indeed, this is presented as a good idea. It is linked to the proposals for 'improving' access by road whether to the A30 or the planned East-West highway. In essence, what this means is that people in Redruth will be encouraged to travel to Pool for various sports and leisure facilities, rather than use local facilities. At the same time people in Truro and Penzance will be encouraged to do the same. So here we have an alternative vision, one where people are dependent on car travel to get from one place to another and are encouraged to do so.

4.30 Proposals have been put forward by CPR Regeneration for a new leisure facility on land adjacent to Dudnance Lane. The principle of this development in this location is supported by the landowner Western United Mines, subject to detailed investigations into ground conditions

More appropriate to upgrade existing site than to build a new mega facility, which will depend on/encourage people across Cornwall to travel there by car! Also need to encourage use of more local facilities – e.g. schools for local use – more potential for sustainability.

4.31 The Council will continue to work with partners to investigate the viability and Delivery of a new leisure scheme, including the precise location. In broad location terms, Pool offers a number of advantages including:

- considerable amount of brownfield land to accommodate a large scheme

- highly accessible location with good links to the A30 (subject to the construction of the East-West Link Road) and central to the communities in Camborne, Pool, Illogan and Redruth.

So the development will encourage additional car traffic, from areas outside CIR, (it is within an hours drive time of 300,000 people!), accessing the A30 and from Camborne and Redruth to Pool. This runs counter to any ideas of reducing car use. Constant reference to the use of the East west highway indicates a preference for car use over public transport. Why would anyone use public transport if additional capacity for car use were provided?

- potential to take advantage of and link into Heartlands Park where investment is already secured the area is already a major destination for some types of retail activity (eg, Tesco, Pool Market, B&Q).

What is the exact link here?

Housing

5.10 One of the main objectives for the Community Strategy, the Housing Strategy and the AAP is the delivery of housing that meets all of the community's needs. This includes delivering more affordable housing as well as ensuring new housing is well designed and accessible to community facilities, jobs and key services. Good design is fundamental to the development of high quality new housing.

Designs in new proposals do not reflect the character of the area or its architecture.

5.11 A policy will identify where housing is to be provided. The Council's preferred approach to the AAP will make provision for 9,400 additional dwellings at Camborne, Pool, Illogan and Redruth by 2026. The spatial strategy sets out the distribution of these homes as follows:

No. of dwellings

Within the urban areas of Camborne, Pool, Illogan and Redruth About 5,600. Beyond the present urban areas of Camborne, Pool, Illogan and Redruth About 3,800. **TOTAL 9,400**

This figure is excessive. It is unsustainable and weakens social cohesion. CoSERG support a lower target.

Affordable housing

5.13 The AAP defines affordable housing as 'social rented and intermediate housing³³, provided to specified eligible households whose needs are not met by the market. Affordable housing should:

- Meet the needs of eligible households including availability at a cost low enough for them to afford, determined with regard to local incomes and local house prices.
- Include provision for the home to remain at an affordable price for future eligible households or, if these restrictions are lifted, for the subsidy to be recycled for alternative affordable housing provision'

There is a need for a new approach to the provision of affordable housing and addressing the causes of unaffordable.

5.14 The affordable housing need of 165 dwellings per annum is more than the total housing provision that is currently being achieved, but the total housing provision it is suggested the AAP will make, equates to 470 dwellings per annum. This gives more scope for contributing to the affordable housing requirement as well as creating open market housing. The AAP will need to seek affordable housing as part of housing development at a level that is economically viable and consistent with other AAP objectives. Negotiations to secure the provision of affordable housing will be undertaken on a site by site basis in the context of

national policy and the policy included in the AAP. This will apply to any planning application for residential use, including sheltered.

The current approach cannot help to provide affordable housing. Selling unaffordables to provide affordables is incoherent.

Housing density

5.17 To minimise the use of greenfield land for development, it is important that all developments make efficient use of land, whether on greenfield or previously developed land.

The use of the term 'efficient' is misleading.

5.18 The housing policies in the AAP will set out minimum densities to be achieved in new residential development.

5.19 Locations close to local facilities and accessible by a range of means of travel offer the greatest potential to reduce the use of the private car. Therefore they should be developed at higher densities

According to planning orthodoxy yes, in reality not necessarily. One unintended consequence of the combination of higher density housing and the loss of green areas within the 'urban area' is likely to be a greater desire for people to use their car to actually get to green areas.

5.20 It is currently suggested that the policy will require housing developments to take place at densities of at least 40 dwellings per hectare of net developable land. In locations where there is good public transport accessibility and facilities are available within walking distance, a density of at least 50 dwellings per hectare of net developable land will be expected. The policy will identify criteria by which to determine where each density requirement will apply. The operation of the policy will provide for account to be taken of impacts that would arise from new development on the character of the local area and on street parking demand.

Simply locating development close to facilities and public transport does not necessarily mean that people will not be using cars. Evidence to support this approach is weak. They might well walk to local facilities but also make car trips to other areas to use facilities.

5.21 The net developable land excludes land uses such as recreation land, main roads, structural landscaping, schools and shops.

So what is the figure for extra land required?

Phasing

5.33 Another phasing issue is to do with the balance of development between homes and jobs. The Council's approach to planning the future of Camborne, Pool, Illogan, Illogan and Redruth is to try to match the level of housing coming forward to the rate at which jobs are added to the local economy. The actual policy mechanism for doing this would be difficult to design and manage, in that developers and others require certainty in order to deliver houses and infrastructure. The practical point again is that the lag in getting the provision of housing up to the higher level will enable some build up of jobs relative to housing to occur. The Council's present view therefore and the suggested approach for the AAP is to set matters in train and monitor progress, leaving the continuing balance between homes and jobs as a matter for a subsequent review of the plan. It must be noted that what the RSS says about housing numbers – which are not equated to job numbers in the Panel Report – will have a major influence over what planning policy can be adopted locally.

This whole paragraph is based on unsound assumptions. There is no way that if 200 jobs are created in Pool, that if 200 dwellings are built there, the householders will fill those 200 jobs. The labour market does not operate that way and neither do households. Building houses using this approach sounds plausible but is essentially an excuse for more population growth. There is an assumption that population growth has followed jobs, yet in the past jobs have had to be created to keep up with population growth. Elsewhere the employment projections are used to justify extra housing. If the RSS panel report numbers are not related to jobs what is the justification?

Planning obligations

5.41 In taking the viability of development into account, contributions will not be sought for all of these matters from all development. The policies will seek to identify how priorities will be established for the negotiation of contributions that best fulfil the plan objectives and implement the AAP strategy according to the particular circumstances of the proposal. The Council currently favours seeking contributions for transport infrastructure, drainage, education, preschool childcare, open space, healthcare facilities and community halls. Contributions may be sought from residential commercial, industrial and retail developments, though the Council will be mindful of the important benefit to regeneration arising from commercial development.

With recession looming, developers are less likely to be able to fund infrastructure related to the development.

Movement and access

5.46 Wherever relevant and possible, proposals should increase accessibility and reduce dependence on private cars, whilst respecting the wish to own cars and hence the need for car storage.

Contradictory and not feasible.

5.47 The AAP seeks to enable more people to cycle and walk to work. Creating safe networks is key to making cycling and walking more attractive as alternatives to the car. Former railway routes function as green corridors for wildlife but also present opportunities for long distance walking and cycling routes, for leisure and for reaching work and services.

People might walk and/or cycle, but that does not mean that car use will be reduced. There is also the considerable amount of traffic movement in and out of the area, which would not be affected by this policy.

Why not use such routes for public transport?

Landscape, green infrastructure and the natural environment

5.51 The land that will be required for development around the towns will represent the greatest change with inevitable consequences for greenfield land, but they also represent important opportunities. Their location will be greatly influenced by landscape character considerations, relating to the setting of the settlement and to the wider countryside. The layout of the larger development areas will be required to include greenspace and allotments and to enhance the connections from within the town through to open countryside.

In reality they do not represent opportunities. There is a need to ensure that land is used sustainably now. For example, many farmers still farm without regard to the environment or landscape.

5.52 Networks of open space are important for biodiversity, as well as providing a leisure resource and means of connecting residential and commercial areas with other facilities. Networks include old railway lines, footpaths, cycle routes, rivers and waterways.

True, hence existing green areas need to be retained and not developed. Although proposals may include the retention of links, there is a significant difference between say an existing informal link, where there are open spaces on either side and its replacement by a link within an area which is developed. Heartlands is a good example. The change from a route which runs between old fields and minescapes, which retains a sense of the character of the area, to one which runs through a more formal park will be quite significant and people will not have the same experience. Indeed, it will be difficult to visualise the links between past and present. An alternative here would be to manage the existing land to enhance the current advantages.

4 An overview of the main issues

This section sets out background material to provide an overview on a range of themes which are relevant to understanding the issues and assumptions contained within the AAP. It draws together points raised in the commentary section.

Population growth

Housing

Transport - Reducing car travel

Sustainability

Environment

Brownfield land

Shopping

Population growth

Kerrier, in common with the rest of Cornwall, has over the past 40 years faced a series of economic threats. Resolving these has proved difficult. At the moment, in line with the overall economic situation across the UK, unemployment has fallen, thus removing one problem. Yet per capita GVA remains low and earnings remain at the bottom of the range. Policymakers in Cornwall have struggled to deal with economic change yet have had to accommodate high levels of population growth, which exacerbate a difficult situation. Indeed, instead of recognising that population growth is a problem, some policymakers regard it as a positive attribute, despite a lack of supportive evidence.

Thus much of the dilemmas posed in the AAP reflect a need to accommodate unsustainable growth. If it were not for this problem it would be possible to devise policies that would ensure improved employment and housing for the existing population and maintain a high quality environment, not only for those in rural areas but in our urban areas where a significant percentage of the population live.

It has been claimed that extra population growth will help in the regeneration of the area. Yet this is just an assertion, unbacked by concrete evidence. Expanding the population of the area is projected as a novel idea, but this is just hype. Population growth is hardly new. The population of Camborne-Redruth has increased by 43% since 1961, significantly higher than the 17% rise across England. Strangely enough, this rise does not seem to have produced many positive benefits. Kerrier's population increased by a third between 1961 and 1991, compared to a figure of 6% for England. Again, it does not appear to have resulted in any relative economic benefits.

Population growth is presented as a force for good, an economic driver, a means of regenerating deprived areas. Superficially, population growth appears to assist in economic growth as it is associated with new housing, new roads and other developments. Cornwall is a prime example of this mirage; there has certainly been growth but per capita GVA, thought increasing remains low compared to the UK average. Cornwall thus has growth but not development. There is an important difference between the two. And even if population growth did lead to economic growth this would not be a viable option to pursue. Data from *Stepping Forward*, (2005). [A resource flow and ecological footprint analysis of the South West of England Ecological Footprint Analysis and Sustainability Assessment], indicates that the carrying capacity of the South West is already far exceeded.

The received wisdom since the 1960s has been that population growth in Cornwall has positive benefits for the economy. But this ignores the weight of evidence for its negative impacts. High levels of in-migration have pushed house prices far above what they would be if prices reflected Cornish earnings. High population growth makes it difficult to accommodate economic change. Policies are pursued to keep pace with demand rather than to induce significant positive change. Essentially, despite the rhetoric, any new job is gratefully accepted rather than the quality employment which Cornwall needs. More profoundly, a contradiction lies at the heart of population growth-led policies. The drive for new jobs leads to excessive demand for labour, which without the focus on training the local workforce, is met by calls for more in-migration, as a consequence of the existing workforce being locked into current lower quality and skill jobs. And so the merry-go-round continues.

If Kerrier, particularly the Camborne-Redruth area, attracts people now, despite its poor economic record, and in the case of the latter, its alleged poor environment, what impact will regeneration have, if deemed successful, on raising levels of in-migration? It could be assumed that in-migration levels would rise, particular if the area is 'sold' as the area to live, work and play in.

Housing

CoSERG contends that current policies on affordable housing cannot resolve the issue of providing adequate housing for those unable to afford the current high prices. We have a bizarre situation where central government is obsessed with stimulating population growth in the United Kingdom, despite the contradiction between this policy, and the need to address climate change and provide affordable homes for the current population. The constant repetitive refrain to 'build more houses', exemplified by the Barker report, is to concentrate on supply. But this ignores all the factors which influence house prices:

- Demand for second homes and homes for investment
- Properties bought under the 'buy to let' format
- Lack of investment by government in affordable housing
- Migration levels (particularly important in Cornwall)
- Interest rates
- Lending policies of Building societies
- Impact of high earners on house prices
- Mortgage rates and the range of mortgage products
- Stamp duty
- Salary levels
- Patterns of public investment
- Demographic and migration factors
- Interest rates
- Attractiveness of housing for institutional investments
- Public investment in housing (or lack of it)
- Availability of personnel and skills in the construction and related industries
- Housing as a personal investment – pension and/or to fund spending
- The effect of 'buyer subsidies', such as the key worker initiative, on local house prices
- Trading in land with permission before it is developed or its acquisition as part of the process of mergers and take-overs within the development industry

Sources include Royal Town Planning Institute, 2003 and 2007.

More dwellings lower prices?

Work carried out by the South West Regional Development Agency (RDA) also questions the assumptions underpinning the Barker Review. 'There are areas where new housing supply has been significant relative to population growth and, yet, it has done little in terms of dampening house price rises. There is no clear link between the relative levels of housing supply and price increases. ... New housing supply adds only marginally to the overall stock and is, usually, insufficient to alter price trends set in motion by other factors' (South West RDA, 2005).

'The changing nature of housing demand – from being an asset whose price principally represents its 'shelter value' (flow of housing services) to an asset whose price also reflects capital investment value – has shifted the market. Increasing housing supply at any feasible rate, given construction capacity, has not, and will not, necessarily dampen people's expectation of further capital or rental gains. Recent price rises have been based on these demand shifts, almost irrespective of supply' (South West RDA, 2005).

Exploring the issue of simply increasing the supply of dwellings the RTPI suggest that 'A very initial look at some research is set out below and this shows that, on one model, a doubling of the flow of permissions and a progressive increase in stock of land available by 20% per year (so doubling in four years) and a doubling of social rented new supply leads to a modest impact on price (a reduction of 4% in year 5)' (Royal Town Planning Institute, 2007).

Other recent research which looked at what would happen if land supply in Berkshire was trebled, suggested that the resulting additional housing would perhaps produce a 5% fall in house prices, a rather insignificant figure. It also indicated that levels of in-migration would rise.

More housing encourages more people to move

There is some evidence to support the argument that increasing housing supply induces in-migration: 'for every extra 100 units of private housing built, 46 extra net migrant households settle in a district and 23 extra new households are formed' (Bramley, cited in Miller, 2006). There are what have been termed 'housing market feedback effects'. You could build two, three or four times as many houses in Cornwall as are currently being built and they would all be sold, such is the latent demand. The problem is that with an open market people who wish to move to Cornwall will be able to do so and as people moving in usually have higher equity/purchasing power than local people then prices inevitably rise. So simply building more houses when we cannot control the housing market cannot possibly solve the problem of local needs and homelessness. Additional house-building in Cornwall therefore would be likely to lead to further demand for second homes, investment property and further in-migration.

Cornwall

Much of the housing demand in Cornwall arises not from a local need but from:

a) *People moving to Cornwall.* For some years Cornwall has had high population growth compared to other parts of the United Kingdom. The number of people living in Cornwall increased by 32% between 1971 and 2001, compared to just 6.5% in England. Analysis of the household projection figures for Cornwall indicate that 68% of the additional 85 thousand households expected in Cornwall from 2001 to 2029 will be created by people moving into the area.

b) *Second and retirement home ownership*

'... represents housing demand that is not necessarily captured in population figures. This also highlights wealth effects and the recent switch of capital from equity investment into property assets' (South West RDA, 2005).

Cornwall is a place where people want to live, due to a number of factors, including familiarity with Cornwall through tourist visits and the promotion of Cornwall as a pleasant place to live. This demand is also fuelled by developers and estate agents who actively create a market for housing. Despite an awareness of a need for affordable housing, too many developments are allowed which obviously cannot contribute to local need. A glance at newspaper adverts and the hoardings outside new development sites clearly indicate substantial numbers of 'luxury apartments,' and 'select developments' catering for those with sufficient finances to purchase a property for investment, a second home or simply to make a new life in Cornwall.

The current situation

House building in rates in Cornwall have been rising since 1995-6 (1500 a year) to between 2,000 and 2,500 per year (Miller, 2006). 'It is not an obvious conclusion from the available statistics that there has been limited supply of new housing in Cornwall. Indeed house building has been at or only just below set housing targets for thirty years' (Miller, 2006). Large numbers of houses have been built in Cornwall, but a rise in population due to in-migration has increased demand.

Dependence on developer-led housing projects cannot succeed as a solution to the provision of affordable housing. If the developer agrees to build such housing as part of a wider development, (assuming a 25% rate) this necessitates building three times as many houses that are unaffordable. This underestimates the actual number of unaffordable houses built as

developers often have sites where affordable houses are not included in the development. There is also another issue pertinent to Cornwall. If so many people currently want to move to what is still perceived as a deprived area, and as a result house prices are zooming up, what happens when areas such as Camborne-Redruth are seen as being more attractive as a place in which to live and work due to regeneration activities? After all that's what the idea of regeneration is all about! Demand could rise even higher, further increasing house prices.

Camborne-Redruth: the issues

Why? The myths

Local needs

Without inward migration, the population would fall slightly each year. Against that, household size is expected to decline slowly. Taking the two factors together and if it was considered appropriate to allow in-migration to continue to keep the population at its current level then there would be a need for about 107 new dwellings per year in Camborne-Redruth, equal to an additional 2,140 houses from 2006 to 2026. This is considerably less than the figures presented in the options, 6,000, 9,400 and 11,100. In other words, for every house actually required to meet local needs another 2, 3.5 or 4.3 will be built.

Affordable housing

It has been stated that 'the majority of residents can afford less than a quarter of the houses in the area' (CPR Regeneration, 2005). Reference is frequently made to the need for affordable housing. But what is meant by affordable housing? People on low incomes seeking accommodation state that even 'affordable' housing is often beyond their means. Current proposals indicate that only 20% of new dwellings in Camborne-Redruth will be 'affordable'. If 20% of dwellings are affordable, then 80% are unaffordable! If local people are in the main limited to obtaining the affordable housing, then in practice the unaffordable housing will only be available to people wishing to relocate to the area from elsewhere in the UK. Houses will be marketed both locally and further afield, thus making the latent desire to move to Cornwall even more of a practical possibility. We have the odd situation that to provide affordable housing, we have to encourage wealthier people to move to the area and buy properties so that developers can make sufficient profit to provide the affordable housing.

The real reasons for house building

The real reason for this massive housing increase is that it is part of a broader plan to make Cornwall safe for continued population growth. Across Cornwall, population growth is still regarded by policy makers as a 'good' thing, a means of improving the economy. Of course, it is only a good thing if you can afford to live in a desirable area; the rest of us will have no other option but to live in an increasingly congested and urbanised area. **[As each version of land allocations has appeared, the number of dwellings per hectare has risen dramatically].**

Locally this myth of housing (and population) led-growth is being driven by the Urban Regeneration Company (URC). Underlying all the hype about regeneration, the main aim of the URC's work is to build more houses in a rather desperate belief that more houses and more people will magically regenerate the area, in the jargon of the Urban Framework Plan 'using housing development as a regeneration-driver' (Llewelyn-Davis, 2001).

We repeat the point - expanding the area through population growth is hardly a novel and dynamic idea, never before tried. The population of Camborne-Redruth has increased by 43% since 1961, significantly higher than the 17% across England. Oddly it hasn't seemed to have made much difference to the area's economy. Camborne-Redruth is also Cornwall's largest urban area, yet this has not bestowed on it the alleged economic benefits hyped up by the URC.

Population-led growth was widely discredited as a solution to Cornwall's chronic economic problems back in the early 1990s. But the URC appears unaware of this. Instead they stubbornly prefer to repeat on a larger scale the same old mistaken agendas and failed policies of the 1970s and 1980s. The failure to come up with really novel and yet sustainable policies for regeneration are disguised by a well-funded PR campaign that is high on rhetoric but sadly short on substance.

The growth policy sits very uneasily with the concept of sustainability. For example the previous AAP, published in 2006, stated that 'the policies and proposals of the AAP should be sustainable'. However, apparently there are no limits to population growth in Camborne-Redruth, although 'the concept of environmental limits is fundamental to sustainable development' (House of Commons Environmental Audit Committee, 2004). There is an important distinction to be made between development for regeneration in the sense of using resources to improve the economic well-being and environment of the local population on the one hand and growth on the other. The latter simply extends the urban area and increases population. Growth without development merely gives the impression of regeneration and positive change but is fundamentally unsustainable.

Housing Requirements Study

'In determining the overall number of additional homes required in Kerrier, the level of future migration is also a critical consideration. It may be argued by some that Kerrier should only seek to satisfy the changing household requirements of the local population – but it is essential to note that providing fewer new homes will not stop households choosing to move to the area from elsewhere. Typically, migrant households will be able to compete more effectively in the housing market than local households – so if the supply of housing is limited, it is likely to be the local households that would be most likely to find themselves unable to access appropriate housing. In this context, it is essential that these inter-relationships are taken into account when considering how the assessed requirements for additional housing should be met, so that no individual element is ignored'.

(Report for KDC, 2008, West Cornwall Housing Requirements Study 2007).

This statement ignores all the factors which influence people moving to Cornwall. It implies that as migrant households will be able to compete more effectively than local households it will never be possible, under current policies, to resolve the housing affordability problem and that population increase has to be 'accommodated' regardless of impact.

Unanswered questions

The affordable housing 'debate' is also notorious for its unanswered questions, such as how many houses coming onto the market each year in Cornwall are bought for:

- Investment;
- Buy to let;
- Second homes;
- New residents;
- Local needs.

How many affordable homes are built by each developer as a percentage of all homes built, as distinct from the percentage on selected sites?

Alternative policies should seek to

- Aim to reduce Cornwall's population growth to a steady-state demographic regime.

- Ensure that the planning system is able to restrict permission for inappropriate developments, which do not meet local, needs.
- Ensure through the planning system that residential property is kept for residential use rather than investment purposes.
- Focus on the provision of affordable housing, possibly by directly providing social housing rather than relying on the developer-led approach.
- Ensure that the transfer of residential property to non-residential purposes is subject to obtaining planning permission.
- Build for local need not luxury demand.

Rather than repeating the government mantra of 'just build more', Cornwall needs to address the underlying issues to create a sustainable solution to affordable housing.

Densification

While densification is portrayed as a means of saving greenfield land and making it easier to sustain public transport facilities this latter rationale can be contested. However, one other vital point is ignored. Densification will lead to increasing polarisation within Cornish society, with those affluent enough to do so living in low density more rural areas, in contrast to the majority of the population who, with limited earnings, will have no option but to live in the urban areas. This has profound implications for community cohesion and social justice.

Transport – reducing car travel

Transport policy is one where the mantra is to reduce car dependency. 'Central Government policy is to reduce the need to travel and the growth in travel distances, in particular by encouraging new development where there are realistic prospects of it being serviced by a choice of transport modes and one journey can fulfil a number of purposes...' (Regional Planning Guidance).

Ideas about moving away from car dependency have been endlessly recycled in policy documents since the 1980s. This approach has been an integral component of Structure Plans and Local Plans. It was also reiterated in the Camborne-Redruth Urban Framework Plan. An assumption that if facilities are located close together therefore the need to travel will be diminished. 'A higher proportion of trips [will] made on foot, by bicycle and public transport' (Llewelyn-Davis, 2001). This plan refers to providing 'better opportunities for cycling and walking'. The current emphasis is an essential element of the New Urbanism. Higher housing densities will also make it possible to support a public transport infrastructure.

On a superficial level it appears to be a suitable method of reducing travel by car. It seems plausible, sensible and desirable, recreating the ideal urban life style. Yet the policies where adopted have played little part in reducing traffic generation. Simply providing a bus stop will not mean that people will use the bus service, and making it easier for people to walk does not mean that people will walk. Locating facilities in the urban area and providing public transport routes does not solve the problem of car dependency.

This is because the assumptions underlying the policy are in fact, fundamentally flawed. They are too simplistic and run counter to what happens in reality. One reason is that many of the factors responsible for traffic generation lie outside simple land-use planning. There are a range of other factors that generate trip – the labour market, the impact of the car, the growth of tourism, 'improvements' to roads, the growth of leisure travel, shop opening hours, the preference for 'flagship' developments to pull in people, the 'rationalisation' of services. Unless these other issues are addressed, there will be a continuing growth in car use.

Policy contradictions

There is also a fundamental contradiction between the aim of reducing dependency on the car and the actual policies. For example, 'Improvements' to the road system increase capacity and generate traffic; additional car parking spaces make it easier to use cars rather than alternatives. Development proposals, which act as a centre for a wider catchment area, encourage travel. Providing a choice in terms of transport options essentially means allowing car/vehicle transport to predominate. A radical approach in terms of planning, perceptions about travel and behaviour is needed. It is not simply a case of public versus private, there needs to be a more rational use of cars. Access to the road network means what it says, access to anywhere at anytime!

The analysis above supported by other research, which has been carried out to examine what people actually do on the ground indicates that people travel by choice rather than due to need. In areas where in theory, the need to travel is limited. The Commission for Integrated Transport (CFIT), in 2005 found that 'Although there are differences between different sizes and location of settlement the important fact is that everyone - *almost irrespective of where they live* - has and is becoming more travel-extensive and car dependent in their behaviour. For planning purposes the salutary lesson is not merely that there is a large body of people already conditioned to extensive car use, but that the majority have become so *despite* living in cities and larger towns where this was not a 'necessity'. CFIT, (2005) App 2.

New Towns and urban villages

The idea of planning for self-containment is not new. The New Towns built after the second world war were implicitly designed with this concept in mind. Integral to this policy was the aim of dealing with jobs-housing mismatches. 'However research on the New Towns themselves demonstrated that, despite being very carefully planned with self-sufficiency in mind, they in fact became progressively less self-contained over time as far as travel to work is concerned' (CFIT, 2005, App 2). The current focus on urban villages where are supposed to be self-contained communities, with a better balance between jobs and housing, is another attempt to reduce travel yet; the reality is at variance with the theory. An example is the satellite communities developed around Stockholm with the intention of creating self-contained communities, where 'the overwhelming majority of people work elsewhere (Hall, 1998).

Location and travel behaviour

Jarvis, in an important contribution to this field stated that 'compact urban forms are [not] synonymous with energy conserving localised living' (Jarvis, 2005). She indicated that 'While traditionally concern has been with the trade-off between housing cost and journey to work, less attention has been paid to the way ongoing negotiations and compromises associated with social reproduction are manifest in residential location and travel behaviour (Jarvis, 2003). Where people live and where they travel is determined by a nexus of intertwining factors. 'Household residential location and travel behaviour are more significantly influenced by the ease with which aspect of daily life come together in a practical sense, a matter of space-time coordination which is at best partially determined by material integration of residential, commercial and transport development. Competing preferences and identities associated with children's education, local social networks and moral cultures cross-cut those of housing choice, journey to work and personal environmental ethos.' (Jarvis, 2005). 'It is therefore not possible to directly equate liveability with spatial rationalisation and thus localisation as implied by the language of planning currently deployed (Jarvis, 2003). Where greater opportunities for walking and cycling have been provided 'studies concede that short walk trips replace neither car trips to regional shopping malls nor single occupancy vehicle journeys to remote places of work. (Jarvis, 2003).

Travel to work

Larger urban areas do not necessarily mean less distance traveled by workers. Plymouth with 6.8 times the workforce has an average travel distance (ADT) similar to that of CIR, Bournemouth 0.92 ADT though its workforce is 10.8 times larger. Such figures illustrate that there are a number of factors which influence distance traveled. It is probable with a modern labour market and the fact that CPIR is close to Truro, Falmouth/Penryn that there will be commuting between the areas. Evidence suggests that the percentage of people who travel to work by car in Camborne-Redruth is only marginally less than the average across Cornwall, 61% compared to 58.5%.

There is a problem

This is not to say that there is not a problem of excessive car dependency and that we should not be pursuing policies to change behaviour and reduce car use, simply that focusing on land use policy is not the answer. Neither does it mean that encouraging walking and cycling is not a worthwhile objective. They can be a useful element of living a healthier lifestyle. The problem is focusing on them as a means of reducing car use, which in many cases is not feasible. Walking to buy the weekly shop is hardly practical, neither is walking or cycling viable if you live some distance from your work. Resolving the problems raised by lifestyle choices is not easy, indeed one reason why environmental issues were ignored in the 2005 election is the recognition that society will have to make dramatic adjustments which will impinge on current (though relatively recent) habits.

Alternatives?

The failure of government to develop integrated transport policies and the inexorable workings of the market create a situation where the accepted form of travel is by car. Rather than travel reduction plans we have travel inducement plans where extra trips are generated, whether by developing out of town shopping or flagship developments to attract people from other towns for example. Innovative policies are required to offset these policy failures. Simply providing 'choice' is not a viable approach. A range of measures have to be adopted, particularly in the management of traffic. Most importantly, government and policy makers have to educate and influence public perceptions and opinion. Sustaining the illusion that we can carry on driving without any negative effects is at best unwise, at worst dangerous. The current approach, whereby expanding and 'improving' the road network continues, is bound to foster the belief that congestion etc is simply a temporary problem which can be dealt with by a by pass here, an extra lane there. Tinkering by traffic management is not an appropriate option. In one sense traffic management policy has a negative impact in that it also reinforces the perception that traffic problems are due to other peoples actions not our own, hence we do not have a responsibility to change our behaviour.

ICT

One issue ignored in current proposals is the rapidly changing world arising from the technological advances in ICT. There is an important question over what impact ICT will have on travel needs. It may be a means of reducing the need to travel or simply another big idea, which in the absence of other policy changes will be insignificant in its impact. In theory, the advent of ICT, particularly the internet removes the rationale underpinning current land use policy. People do not necessarily have to live close to employment or other facilities. It is and will become increasingly the case that people in relatively remote rural areas will be able to carry out more activities without additional travel, in fact there is scope for more activity and less travel. Lake (2002), has suggested we are increasingly moving towards a world where the 'Death of Distance' is reality. This raises a number of issues which are not addressed. Indeed, policy as derived from central government is based on an older, different, bygone age where different paradigms ruled.

This does not mean that urban sprawl should be encouraged (current policy already does that practically in response to the need to accommodate population increases) or that

anything goes, but it does mean that old ideas about travel, work, shopping will increasingly become outmoded. Indeed, it is possible for example, that in a few years time the idea that moving shops in Camborne-Redruth to one central location will be considered an expensive and unnecessary experiment.

Camborne-Illogan-Redruth

There are particular problems in the Camborne-Redruth area. One is the high level of traffic into and out of the area. This is a consequence of commuting patterns, the distribution of retail and other facilities. 'Better' access is likely to increase the number of these trips and reduce the need/desire for alternative transport. The UFP referred to previous developments which were considered to have contributed to car dependency in the area, had exacerbated trip generation and led to a misuse of land. It stated 'Recent developments in Pool in particular have excessive car park provision. In warehouse developments such as the Big W, car parks are only occasionally fully occupied....' (Llewelyn-Davis, 2001). However, it did not propose to address these issues, instead accepting that parking for retailing, tourism and services should be retained, which in essence means accepting the bulk of current and future car movements in the area. Current proposals to increase road capacity will only perpetuate this situation.

Ostensibly a resolution would be both to create regular bus links to such a development and to reduce car parking capacity. In theory, the new Tesco store could have been developed incorporating these ideas. However, current policy, by creating a new route for cars runs counter to this and we are not aware of any proposals to reduce car parking capacity.

Sustainability

Towards a really sustainable strategy

Two critical issues insufficiently addressed in this AAP, which should be addressed on a Cornish level are:

- What are the actual carbon costs of continuing to encourage building levels on the scale proposed and what effects will this have on global warming and on the rate of loss of natural habitats?
- What is the carrying capacity of Cornwall?

Carbon costs

Rates of house building, traffic growth and land-take in Cornwall have for the past half-century been much higher than in the south west of England and the growth of carbon emissions has consequently been greater. The resident population of Cornwall is now producing an ever-increasing share of total UK carbon emissions. A further substantial increase due to additional population and economic growth together with rising tourist numbers is expected. Global warming is the major threat facing the future of the planet. Even the previous Prime Minister is on record as paying lip service to this, despite the fact that the actions his government has taken to reduce the growth of carbon emissions, let alone their absolute level, have been extremely feeble and even more pathetic than the general EU norm.

Carrying capacity

Way back in 1976 Cornwall County Council argued that in order to 'maintain the physical character of Cornwall' its ideal population capacity would be 430,000 (Structure Plan Policy Choice Consultation Document). We've now left this figure far behind as the population in 2001 was 501, 000 and is now around 529,000. Not surprisingly, little has been heard about ideal populations since the 1970s! Yet the problem is now even starker as we are supposedly more aware of the dire environmental outcomes that accompany human activity in a high consumption economy. It is estimated that the land required to provide the

resources for one person is 5.3 global hectares. In Cornwall, we are already consuming twice the resource capacity of Cornwall. In other words we are doing our bit to eat up the earth's finite resources – and these can never be replaced. If we were to decide to live in harmony with the planet's resources we would need to be looking at a population of 270,000 at current consumption levels. This is the real carrying capacity in Cornwall. Alternatively, we must reduce our use of resources drastically.

High rural population densities, an over-large and environmentally costly tourism sector and the very poor state of bus transport and limited access to mainline railway services means that levels of use of public transport are much lower in Cornwall than in areas of more nucleated settlement. The result is that population growth imposed on the Cornish settlement framework produces higher pro rata pollution effects, something increasingly visible in the congestion and litter footprints now common in and around our urban areas and road system. Proposing more concentrated population development is no solution to this unless it is to be accompanied by a forced evacuation of the countryside. Instead it is a policy of despair and indicates the poverty of endless consumption-fixated economic growth. The only practical solution is a reduction of hyper-population growth in Cornwall to achieve an eventual steady-state before moving towards the gradual harmonisation of population and carrying capacity, by measures to reduce that population together with a managed reduction of current consumption levels.

Environment

There is an assumption underlying decisions on land use that that there are areas which are of special value and therefore should be protected, and by implication the other areas are of lesser value, and can be used for development. Sustainability requires that we look at the environment in total. Assuming that if we 'protect the best' we are being sustainable is a fallacy. We have to look at the total environment as a resource.

At the same time Government induced changes have resulted in the removal of Area of Great Landscape Value (AGLV)s and Area of Local Landscape Significance (ALLS), thus opening up additional land for development. Land at Tolgus, which the AAP suggests could be developed for housing was an ALLS.

Brownfield land

There is much reference to the use of brownfield land in planning documents relating to the Camborne-Redruth area. Both the media and the public have, it appears largely accepted the idea that there significant areas of brownfield land available for development. Indeed, the existence of brownfield land is a key element of the proposals to focus development in the area. Some discussion is required to examine the concept of brownfield.

What is brownfield?

We all have an idea of what brownfield land is – old sites formerly used for factories or an expanse of desolate mining land. But it's not as straightforward as that. What is defined as brownfield includes land that most people would not regard as brownfield. A lot of land included in current allocations, consists of small fields and other green areas, some of which may have been last used for mining a century and a half ago and is now revegetated. In the past some non-brownfield sites have been termed brownfield sites – Tolvaddon Energy Park for example. There is a question as to whether an area which has brownfield sites should be considered as an area for development simply because it has reserves of brownfield land. The existence of brownfield land should not be seen as a reason for building on it. There are other uses and there is the question of long-term demand. If we build on all this land now, simply thinking of it as something we must build on because it is there, then we will have to use greenfield land in the near future.

Policies

The discourse of dereliction runs through planning documents for Kerrier. A belief in the negative impact of 'derelict' land permeates the Urban Framework Plan, which underpins the LDFFP: 'and adds new places of equal worth where there is currently dereliction and wasteland'. (Llewelyn-Davis, 2001). Or 'The need to 'green' the area is a very strong message to come out of community consultation exercises' (Llewelyn-Davis, 2001).

The UFP emphasised the concentration on using brownfield over greenfield, stating that in the existing Local Plan allocations 'greenfield housing designations in particular are being critically reviewed'. In a bold move the UFP expressed a need to revise plan policy, which required the use of existing proposals.

'Many of these are allocated in the Local Plan, but will be reconsidered as part of the Local Plan review process in the context of ensuring that the focus of investment and development is on brownfield land. In recent years, development activity has focussed on such less constrained greenfield sites or upon the development of drive in retail sheds on the larger brownfield sites, especially in the Pool area. However, a fundamental starting premise of this strategy is to reverse this trend - to grasp this once in a lifetime opportunity to clean up, restore and put the area's brownfield land to productive use. (Llewelyn-Davis, 2001). #

The point was reiterated in the 'Planning Issues' document released by Kerrier in 2005.

'5.66 New housing development land should be allocated on brownfield redevelopment sites within the existing urban area where its implementation should mostly be led by the Urban Regeneration Company (URC). Those sites that are strategic for regeneration should be prioritised by the Area Action Plan. There should be no need for new greenfield allocations to meet the housing development targets' (KDC, 2005, Planning Issues).

'5.92 Most urban brownfield land in Kerrier is within Camborne Pool Redruth and its regeneration should maintain the overall Kerrier wide proportion of brownfield development. The district wide level of existing housing commitments by planning permission, housing land allocations and the significant opportunities for brownfield housing redevelopment in the CPR urban area should enable sufficient housing development without the need for new greenfield land to be allocated for housing development' (KDC, 2005, Planning Issues).

This image of considerable areas of brownfield land ripe for development was reinforced in the 'Vision, Strategy and Core Policy' document:

'Kerrier has almost 300 hectares of vacant previously developed land and buildings. New development should reflect the priority to maximise the use of urban brownfield land and buildings ... to meet housing needs ... Most new housing provision should be within the urban area of Camborne Pool Redruth ... It has considerable urban brownfield land with development capacity but has constraints to be overcome' (KDC, 2005).

Use of brownfield was again emphasised in the draft Camborne-Pool-Redruth-Area Action Plan (CPR-AAP): 'New development proposals will be mostly urban and brownfield. New industrial and employment proposals are mostly at Pool and are brownfield. Most housing proposals to 2016 are brownfield' (KDC, August 2006).

'CPR is suitably strategically located for development ... It has a special development opportunity because of the need to improve and recycle

substantial areas of its previously used (brownfield) land. The resources needed to remediate it are now available and its reuse before greenfield development is a national priority to enable the efficient use of resources, the reduction of the need for travel and the protection of the wider environment' (KDC, August 2006).

'Decades of under investment in CPR has [sic] been a deterrent to brownfield development and economic, social and environmental improvement. The combination of the legacy of urban brownfield land, the availability of the resources to enable its redevelopment, the priority for its reuse, the housing and economic needs of the area, the higher order of development plans providing for urban growth and the introduction of the URC have created a significant opportunity for change, investment and redevelopment for the improvement and regeneration of CPR that should be fully exploited' (KDC, August 2006).

However, an indication that there might be limits to the extent of the 'considerable' brownfield reserves also appeared: 'Some greenfield housing proposals will be needed between 2017 and 2026 Some greenfield extension of the urban area is also unavoidable' (KDC, August 2006). And, 'further land may need to be brought forward towards the end of the plan period to maintain economic regeneration including where necessary greenfield proposals for employment development.' (KDC, August 2006).

The reality

For, despite all the fine words, the blunt reality is that there is limited brownfield land in Camborne-Redruth and most development in the area will use greenfield sites. Of the 307 hectares of brownfield land in Kerrier listed on the National Land Use Database (NLUD) for 2004, only one fifth was within the already built-up zone of Camborne-Redruth, about 65 hectares in total. Of this, the NLUD figures indicate that 32 hectares are deemed to have capacity for housing, enough for 767 dwellings, though only 19 of these hectares are actually proposed for housing (a total of 338 dwellings). [Ten hectares are considered for employment use (341 dwellings)]. The total capacity of brownfield sites in Camborne-Redruth therefore only equals 27% of planned housing provision from 2005 to 2016 (2,860 dwellings) or 13% if we include the lower figure of 6000 proposed houses up to 2026.

Pool has been cited as the main area of brownfield land. Analysis of the CPR-AAP (2006), and including areas proposed by the RDA for acquisition, indicates there is 68 hectares of land intended to be developed. A breakdown of the figures is illustrative. Of the total, nine hectares are actually greenfield while 26 consists of already developed land*, leaving 33 which is actually brownfield. Paradoxically, nearly half of the brownfield land - 15 hectares - is to be used as open space, continuing the long tradition of converting old mining areas into green open space while green open space is turned into developed land. So whereas the rhetoric involves using brownfield, the reality is significantly different.

[* The developed land consists of businesses and houses currently in use, some open space (previously reclaimed), together with existing premises currently vacant.]

Past brownfield

It might be thought that much of the previous housing growth in Camborne-Redruth made use of brownfield sites. Yet the reality is disturbingly different. Much of the land developed since the early sixties was greenfield; analysis of the 470 hectares of land developed since 1958 shows that brownfield accounted for 70 hectares, 15% of the total.

The belief that 'greening' is of itself always a public good is somewhat misplaced. 'Greening' does not necessarily lead to economic regeneration. It also has to be placed in context. The

Camborne-Redruth area contains a wealth of environmental and historical sites. Many of these are linked to the area's mining past. There is also a view that the term 'derelict' is often misused in a Cornish context. See '*Dereliction: An Alternative View*', CoSERG, 1996. There is a potential conflict here with the need to maintain existing minescapes and retain distinctiveness. 'Greening' the area so that it looks more like Surrey will destroy one of the cultural attributes of the area.

We agree that derelict land and buildings should be re-used. But care needs to be taken in their new use. Where land has been built on in the past and is to all intents and purposes only appropriate for re-building, then that too should be allocated for building.

Shopping

Shopping raises a number of issues. Previous retail policy and practice in the area has left a planning legacy, which makes future planning difficult. At Pool, the decision, by a planning inspector in the eighties to give permission to Mainstop at Pool and the decision to change the use of the old Heathcoat's to retail started the move towards a new 'centre' at Pool. Since then the trend has accelerated. In Camborne the new Tesco effectively led to a twin pole town centre. The decision to allow Tesco to re-locate from Redruth town centre to an out of centre location has resulted in the fragmentation of Redruth's shopping centre. They have also resulted in increased demand for travel as shops compete against each other for trade not only increasing the number of trips within Camborne-Redruth but trips from other urban centres.

All of these decisions have been the consequence of the primacy of the market and the emasculation of the planning system, which was originally designed to balance interests and take account of community and environmental concerns.

Though an admirable objective, simply providing a range and quality of shops accessible to the community does not in itself reduce travel. Consumer sovereignty means that people will travel for a variety of reasons. Shopping generates a desire as well as a need for travel. People may live close to a centre, which has appropriate facilities yet choose to shop elsewhere. People may not **HAVE** to travel but will do so. Indeed, it is in the interest of retailers that people do so. This obviously undermines the concept of a simplistic link between location of housing, shopping and other activities. Generally it is mainly the poor without access to cars who shop locally and who walk to their shop. Increasing prosperity and car ownership will in itself lead to extended shopping trips.

If shopping services at Pool were to be expanded to serve the needs of the whole area then this would have a negative impact on the existing shopping centres, already affected by the transfer of shops to Pool and the re-location of Tesco in Redruth to an edge of town location.

The growth of ICT and its impact upon society is sometimes over-emphasised, but it does mean that old ideas about travel, work, shopping will increasingly become outmoded. Indeed, it is possible for example; that in a few years time the idea that there is a shopping centre, where everyone travels to shop will be considered an odd way of running the retail economy.

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