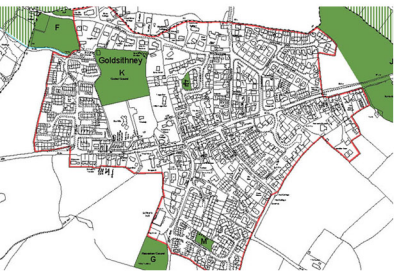


PERRANUTHNOE PARISH NEIGHBOURHOOD PLAN  
CONSULTATION STATEMENT



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## INTRODUCTION

This Consultation Statement is being submitted by Perranuthnoe Parish Council as the qualifying body submitting the Perranuthnoe Parish Neighbourhood Plan, to fulfil the legal requirements of the Neighbourhood Planning Regulations 2012. It aims to provide a clear summary of the consultation and engagement process, and how it has enabled the Parish to develop a Neighbourhood Plan that responds effectively to the issues and priorities highlighted by consultees.

The consultation and engagement process has been core to formulation of the Neighbourhood Plan, and the Parish would like to start this Consultation Statement by thanking all those who have freely given their time and resources to support development of the Plan over the last few years; it could not have been achieved without you.

The neighbourhood planning process was initiated by Perranuthnoe Parish Council in 2015, following a Parish wide scoping survey the previous year, in which all local residents were asked about their development aspirations for the Parish, the local development planning issues of importance to them, and whether they felt that the Parish should engage in neighbourhood planning. There was clear and overwhelming support for the development of a neighbourhood plan, and a range of concerns were raised about current patterns and levels of development, and the long-term implications for peoples' lives, homes, livelihoods, and local areas and assets that are of importance to their health and well-being. From the responses, it was clear that people felt that there is a need to achieve more locally informed and responsive development for the Parish. The Parish Council recognised that to achieve this, an effective consultation and engagement process would be key.

The aims of the Perranuthnoe Neighbourhood Plan consultation and engagement process have been to:

- 'Front-load' the neighbourhood planning process, so as to ensure that the Plan is informed by the knowledge of local communities and stakeholders from the earliest stage
- Raise awareness and understanding about the role of neighbourhood planning and of opportunities for people to engage in it, and ensure that the Parish community are kept informed throughout the neighbourhood planning process
- Facilitate a well organised, structured and publicised consultation process, so as to enable Parish communities and local stakeholders to be directly involved in shaping the development of their Neighbourhood Plan, and so as to ensure that the Plan's policies focus on planning issues and objectives prioritised by the Parish community
- Engage with as wide a range of people as possible, using a variety of events, processes and communication techniques, encouraging stakeholder participation throughout the Plan development process
- Consult with all relevant statutory organisations, and with organisations who may be affected by, or able to input to, the Plan
- Record stakeholder feedback on the emerging Neighbourhood Plan document, and clearly outline how consultees input has been used to shape the Plan

The consultation and engagement process has highlighted the development planning issues of key importance in the Parish, and has increased understanding of ways to address those issues, in order to establish a more positive and sustainable approach to local development.

Community and local stakeholder consultation and engagement in the neighbourhood planning process has been core to formulation of the Plan, enabling the Parish to put forward an approach

to local development planning that can work to achieve positive long-term sustainable social, economic and environmental outcomes for the people that live and work here.

Consultation with and input by public sector bodies and organisations has also been core to the process, providing the analysis and recommendations necessary to ensure that the Neighbourhood Plan's policies align with broader sectoral and area specific plans, policies and regulations, and that the Plan works positively to support the achievement of broader sectoral, county and national strategies.

It is a requirement of the Neighbourhood Planning (General) Regulations 2012 that the qualifying body submitting the Neighbourhood Plan proposal to the Local Planning Authority include a Consultation Statement that:

- a) contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan.
- b) explains how they were consulted
- c) summarises the main issues and concerns raised by the persons consulted
- d) describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan

The following sections of the Consultation Statement outline the consultation and engagement process that has supported development of the Perranuthnoe Parish Neighbourhood Plan, and summarises the main issues and concerns raised and how these have been considered and addressed in the Plan.

Tables 3 and 4 presents the details of feedback received from statutory and public consultees on the draft Neighbourhood Plan during the Regulation 14 pre-submission consultation. Alongside each consultee comment is a summary of the Parish response, and if/ how the Plan has been amended to address the issues raised.

The feedback received from the pre-submission consultation indicates that there is strong support for the NP; the comments received from the majority of consultees, both statutory and community, provide overall endorsement that the NP establishes appropriate policy provisions and strategic guidance to address priority development planning issues and concerns in the Parish, and that it charts a positive path for sustainable development planning in the Parish.

The Parish Council hopes that by establishing a locally informed Neighbourhood Plan with clear policies to address priority development planning issues, that this will help to ensure that national and county policies are effectively applied to the local context, charting a more informed and positive path for sustainable development across the Parish.

## **DESIGNATION OF PERRANUTHNOE PARISH AS A NEIGHBOURHOOD PLAN AREA AND INITIAL ASSESSMENT OF COMMUNITY CONCERNS & OBJECTIVES**

### **Parish Community Survey**

In the summer and autumn of 2014 Perranuthnoe Parish Council organised a Parish wide community survey in order to assess public interest in proceeding with a Neighbourhood Plan. The aim was to:

- seek the views of local people on the proposal to initiate a neighbourhood planning process for the Parish;
- gauge the key planning issues of concern to local communities, and potential opportunities to address those issues through a neighbourhood planning process
- gauge local interest in volunteering to help facilitate the neighbourhood planning process

The results of the survey indicated that there was strong local support for the Parish Council to initiate neighbourhood planning, with over 80% of responses stating that they would like the Parish to develop a Neighbourhood Plan. A considerable number of community members also indicated that they would be willing to volunteer to support the neighbourhood planning process.

As well as determining whether the Parish should initiate a neighbourhood planning process, the survey also sought to gain an initial understanding from Parish communities of the issues of most importance to them, and their overall development planning objectives for the Parish. The aim of this was both to support neighbourhood planning, should the decision be to move ahead with it, and to support the Parish Council in prioritising projects and support.

Community responses highlighted the following:

The most important aspects of the Parish for quality of life:

- The Coastline
- Local Built Heritage
- Uninterrupted Offshore Public Views
- Unspoilt Public Landscape Views
- Footpaths and Bridle paths
- Natural Habitats
- Hedgerows
- Trees
- The Farmed Landscape
- Field Patterns
- Ridges and Skylines

Planning issues of priority concern:

- the impact of development on the local character of villages and hamlets;
- parking pressures and increasing road traffic within villages and hamlets and the impact of this on communities' lives and safety;
- the negative impact that patterns and levels of development are having on natural and heritage landscapes, and in particular the coastline;
- the need to sustain local services and facilities, including community green spaces;

Key Objectives for development planning in the Parish:

- Conserve the natural landscape character of the coastline;
- Ensure that development does not impact on peoples' enjoyment of footpaths and bridleways
- Conserve hedgerows and Cornish Hedges;
- Conserve views of natural and heritage landscapes from footpaths, bridleways and public vantage points,



- Conserve natural habitats
- Afford greater protection to trees

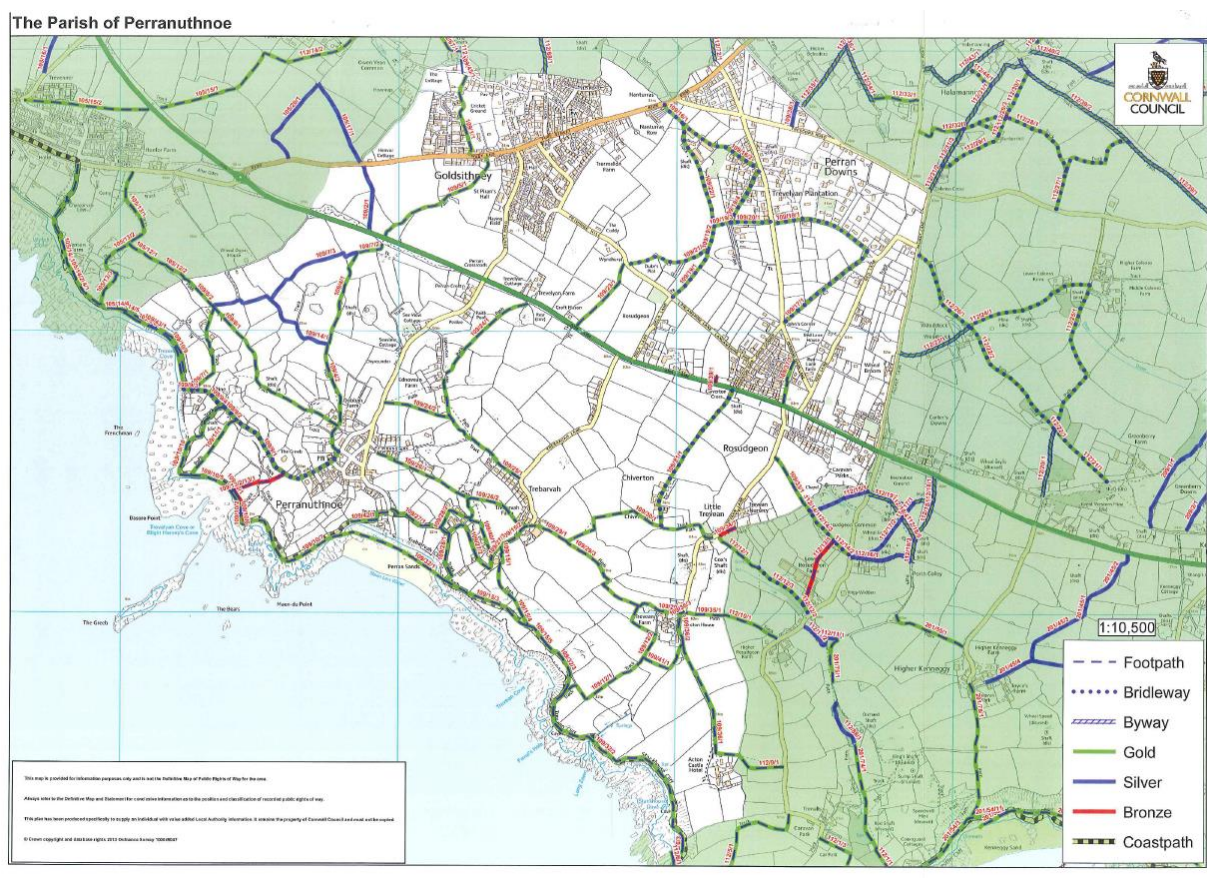
## Designation of Perranuthnoe Parish as a Neighbourhood Area

Perranuthnoe Parish Council submitted a designation request for undertaking a Neighbourhood Development Plan in July 2015 (Application number: PA15/00018/NDP). The Parish Council is identified as the 'relevant body' for the purposes of 61G of the Town and Country Planning Act (1990) being the Parish Council for the application area.

The application was open for comment on Cornwall Council's online planning portal and a number of statutory consultees were consulted individually prior to decision on designation. Comments were received from the Highways Agency, Cornwall Council's Department for Historic Environment Planning (Archaeology) and Natural England. All supported the proposal for the Parish to become a neighbourhood area and to initiate development of a Neighbourhood Plan, and asked to be consulted in further stages of the NP development process. Their comments are provided in Appendix 1 to this Consultation Statement.

The advice and recommendations provided by these statutory consultees has been considered and followed by the Parish in development of the Neighbourhood Plan and all relevant consultees have been consulted in development of the Plan, in particular within the Strategic Environmental Assessment (SEA) screening process and within Regulation 14 pre-submission consultation.

Perranuthnoe Parish was officially designated as a Neighbourhood Area in September 2015. The decision report is appended to the Basic Conditions Statement which accompanies this Neighbourhood Plan (NP) and specifies that 'The Neighbourhood Area illustrated on Plan 1 is designated in accordance with the Neighbourhood Planning (General) Regulations 2012.' The designated Perranuthnoe Parish Neighbourhood Area is highlighted in the following map:



It should be noted here that a small additional land area was added to the Parish in 2021, following the Community Governance Review, the land areas previous lay in the Parishes of Marazion and St Hilary. However, these were not included in the original NA designation and therefore this means that under national regulation are not covered by the Neighbourhood Plan.

## **ROLE OF THE PARISH COUNCIL AND ESTABLISHMENT OF A NEIGHBOURHOOD PLAN STEERING GROUP**

The Parish Council are the formal Neighbourhood Planning Body responsible for oversight of the process and for formal submission of the Plan under the Neighbourhood Planning (General) Regulations 2012. Following the decision to initiate the Neighbourhood Planning process, and designation of the Perranuthnoe Parish as a Neighbourhood Area in 2015, the Parish established a neighbourhood planning information section on the Parish Council website, and invited community members to contact the Parish Council clerk to become involved in the process, or for further information. Neighbourhood planning was also added as a regular monthly item on Parish Council meeting agendas.

The Council established a Steering Group to manage, facilitate and support the Neighbourhood Plan development process made up of a partnership between community volunteers and Parish Council members. Three Councillors were nominated to serve on it. The Parish Council agreed Terms of Reference for the Steering Group and an overall programme of work was developed by the Group to guide the NP development process. There has been consistent Parish Council and community membership of the Steering Group over the six-year period of Plan development, with community members participating from across communities in the Parish. The Group have met regularly and have worked closely together to plan, manage and support the evolution of the Neighbourhood Plan. Monthly reports on progress were given to Parish Council meetings.

The Steering Group has also been supported by a considerable number of community volunteers in the collation of information and data, and analysis of information to support Plan development, the production and distribution of awareness raising material and questionnaires, the design of a dedicated neighbourhood plan website, and the facilitation of consultation events.

A number of planning professionals were also contracted by the Parish Council to support NP development including for landscape character assessment, the delineation of settlement boundaries and in providing strategic advice for policy formulation. The final NP draft has been reviewed by a planning professional with specialised expertise in neighbourhood planning, who has also completed the NP Basic Conditions Statement. The Parish Council has provided consistent support and guidance to the NP process, including the review and approval of all key documents.

### **Consultation and Engagement Strategy**

The Steering Group realised how important a well-planned and managed consultation and engagement process is for development of the Neighbourhood Plan, and one of the early tasks the Group undertook was to work together to prepare a 'Consultation and Engagement Strategy' to guide the consultative neighbourhood planning process. This was used alongside Cornwall Council's Neighbourhood Planning Consultation and Engagement Toolkit which provides detailed guidance on approaches and tools for public consultation and engagement.

The Consultation and Engagement Strategy outlines the principles, approach and strategy for the Neighbourhood Plan development process. It also provides core background information on the Parish's socio-economic make-up, including community profiles and socio-economic data, the distribution of communities across the Parish, a list of local businesses and service providers, public facilities, and of stakeholder groups operating but not living in the Parish. The Strategy also outlines the core public-sector organisations and NGOs who are likely to be affected by the Neighbourhood Plan, and whose input is important to it. The Strategy emphasises that to achieve effective consultation and engagement it is important to understand community make up, and the range of stakeholder groups who support or use the Parish. It provides information on tools and techniques for effective consultation and engagement, and links to further information. A programme of activities was also developed alongside the Strategy to guide the Steering Group in scheduling events, organising volunteer input, and in engaging professional help for focussed assessments and plan development.

The Strategy and programme of activities have provided the framework through which the Steering Group have planned and managed the consultative process. It has enabled the Steering

Group to ensure that all local communities and stakeholders with interests in the Parish have had an ongoing opportunity to participate in the NP development process, and that a high level of community input has been achieved. A link to the Strategy is provided in Annex 1.

## **THE CONSULTATION AND ENGAGEMENT PROCESS**

The Consultation and Engagement process has involved a range of approaches and techniques, with a core objective being to ensure that neighbourhood planning has reached out to all Parish communities and local stakeholder groups, and that it has encouraged strong engagement in the neighbourhood planning process. A range of different techniques and communication pathways has been used to generate interest and involvement in Plan development and to ensure that the process has been well publicised. The consultation methods used have included:

- Surveys and questionnaires
- Open Meetings
- Public consultation events focussed on key issues, studies and policies
- Displays and Stalls at Community Fairs
- The production of posters, leaflets and flyers and distribution across public places
- Development of a dedicated Parish Neighbourhood Planning website
- Engagement through the Parish Council website and at Council monthly meetings
- Community engagement through the Steering Group
- Door to Door information dissemination and awareness raising
- Social Media and village / community forums

The initial focus of consultation and engagement was on 'scoping' to identify the key planning and development issues, concerns and objectives of Parish communities and local stakeholders. Analysis of the information gathered across NP scoping events, revealed a pattern of recurring issues, priorities and objectives. The feedback received from the scoping events and surveys was clustered into themes, which in turn provided the focus for development of Neighbourhood Plan Objectives and Policies. Further focussed assessments, studies and consultation events were held to guide the design of a number of specific policies, in particular those relating to the designation of specific areas, such as Development Boundaries, Local Green Space, Heritage Assets and Principle Residency.

In order to ensure that the NP policies were designed based on clear data and a strong evidence base, the Parish commissioned a number of professional assessments, and also undertook local research, data gathering and site assessments. There has been direct community input to the process of data gathering and assessment.

A dedicated NP website was developed with input by community volunteers and the Neighbourhood Plan Steering Group. It can be referenced at: '[www.ourperran.co.uk](http://www.ourperran.co.uk)'. The site was approved by the Parish Council and a direct link established between the Parish Council website and Perran NP website. It provides detailed information on the Parish neighbourhood planning process, a summary of the NP Objectives and Policies for people's ease of reference, links to key documents and general background information on the role of Neighbourhood Plans in development planning. Contact details of the Parish Clerk are provided for further information requests or if people wish to get involved in the process. It has been an important and easily accessible way for people to get information on the NP and the process, and to engage in it. The Parish Council website also provides an overview of the NP process.

The consultative neighbourhood planning process has provided clear guidance and focus for the development of Neighbourhood Plan objectives and policies, enabling these to be tailored to address the priority planning issues local stakeholders have identified, and to meet the development needs and aspirations of local communities.

It has also raised public awareness of the opportunity that neighbourhood planning provides for people to get involved in shaping the future of their Parish. It revealed that many people feel frustrated that development planning is not currently based on an understanding of the local area, or of development issues of importance in the Parish, and that their concerns and the information



they provide relating to individual applications are currently not considered or given any weight within planning processes. The NP process has helped to demonstrate that people can have a voice and that they can help to shape planning in a way that respects place and people, whilst still meeting broader county and national development objectives and targets. It has given hope that the NP will be actively used in planning processes to help achieve more positive and locally responsive development.

### Timeline: Key Neighbourhood Planning Consultation Events

| <b>Perranuthnoe Neighbourhood Plan Consultation &amp; Engagement Process: Key Events</b>                               |                |  |
|--|----------------|--|
| <b>Event</b>   | <b>Dates</b>   | <b>Purpose</b>   |
| Parish wide Neighbourhood Plan Scoping Survey & Questionnaire  | August 2014    | The Parish Council undertake a Parish wide scoping survey to determine whether to initiate the neighbourhood planning process. This involved the distribution of questionnaires and letters to every household in the Parish asking residents to voice their opinion as to whether the Parish should initiate neighbourhood planning. The questionnaire also asked people to identify key planning and development issues, concerns, & priorities in the Parish. |
| Submission of Neighbourhood Plan Area Designation Request to Cornwall Council  | July 2015      | Perranuthnoe Parish Council submit a designation request to initiate the neighbourhood planning process (Application number: PA15/00018/NDP).  |
| Perranuthnoe Parish officially designated a Neighbourhood Area   | September 2015 | Perranuthnoe Parish is officially designated as a Neighbourhood Area   |
| Open Day at Parish Hall  | February 2016  | An Open Day is held at St Piran's Hall, to provide feedback on the neighbourhood planning survey results, and to undertake further consultation to gather information on the issues, aspirations and concerns of local communities relative to development planning in the Parish.   |
| Neighbourhood Plan Steering Group established  | October 2016   | The Parish Council establish a Steering Group to manage, facilitate and support the Neighbourhood Plan development process. It is made up of a partnership between community volunteers and Parish Councillors.  |
| Parish Council issue Neighbourhood Plan Position Statement   | October 2016   | The results of the surveys, questionnaires and open day are analysed. This reveals a clear pattern of issues, priorities and objectives raised consistently across community feedback.<br><br>The Parish Council issue a Neighbourhood Plan Position Statement, summarising key planning and development issues for the Parish.  |
| Neighbourhood Plan Open meetings in St Piran's Hall Goldsithney and St Piran and St Michael Church Rooms, Perranuthnoe | April 2017     | Open meetings are held to gather further input and guidance from the Parish community on some core issues emerging from the NP scoping consultations in particular relative to: <ul style="list-style-type: none"> <li>- Housing and development needs</li> <li>- Local green space</li> </ul>   |

|   |                       |   |
|---|-----------------------|---|
|   |                       | - Traffic, Parking and Congestion   |
| Neighbourhood Plan Stall and Survey at the Parish Charter Fair, Fore Street Goldsithney   | August 2017           | A neighbourhood planning stall is set up at the Parish Charter Fair, to raise further local awareness of, and engagement in, the neighbourhood planning process, and to obtain further input from the wider community on key planning and development priorities, objectives and issues in the Parish.  |
| Commissioning of a Settlement Boundary Assessment   | September 2017        | The Parish Council engage a Cornwall Council planning expert to undertake a settlement boundary assessment for the Parish.  |
| Consultation on proposed Development Boundaries and areas identified as Local Green Space | January to March 2018 | Consultation on proposed Development Boundaries is undertaken through the Parish Council website and at meetings, with proposed development boundary maps available for review on the Parish Council website. The process was publicised on Parish notice boards, websites and via community forums and social media.   |
| Local Landscape Character Assessment (LLCA)   | March 2018            | The Parish Council engage a senior landscape architect to undertake a Local Landscape Character Assessment for the Parish.  |
| Principal Residency Survey  | July 2018             | Assessment of the proportion of houses occupied as residences and those used as holiday-lets or second homes. The initial web-based assessment of properties advertised as holiday homes is followed up by a house-to-house survey by community volunteers across the AONB, which the initial assessment indicated is the area most severely affected by the loss of housing to holiday-lets. The principle residency survey, and issues raised in community consultation events, provides clear information to support the design of a principle-residency policy. |
| Open Day on Local Landscape Character Assessment (LLCA) at the Parish Hall                | Nov 2018              | An Open Day is held at St Piran's Hall to present the draft Local Landscape Character Assessment and gain public feedback on it. The LLCA is also posted on Parish websites for review.   |
| Appraisal of Local Heritage Assets  | June 2019             | Appraisal of areas, assets and features of local heritage value, following Historic England guidance for Historic Areas Assessment, Local Listing and Site Allocations in Local Plans.  |
| Neighbourhood Plan drafting   | July to October 2019  | Comprehensive assessment and review process supports the drafting of NP objectives and policies, and of the evidence base and strategic / regulatory justification for each policy. Review of the results of public consultations over the previous 5 years showed a pattern of recurring   |

|  |                         |   |
|--|-------------------------|---|
|  |                         | development planning priority issues, objectives, and concerns. Subsequent data collection, assessments, appraisals and focussed consultation sessions provide further detailed information and data. Review of development patterns, comments by formal and public consultees on planning applications, and of associated planning outcomes, provides further understanding of issues, highlighting 'planning in action' within the Parish. Review of generic development planning, area specific and sectoral strategies, frameworks, policies, regulations and guidelines provides an understanding of the strategic and regulatory context, and of the scope for neighbourhood planning to address priority issues. Based on this overall assessment a framework of NP Objectives and Policies is established and developed to form a draft NP. |
| Assessment and approval of initial draft of the NP by Perranuthnoe Parish Council                              | October 2019            | The initial draft of the NP is considered by the Parish Council at its October meeting and approved for submission to Cornwall Council for strategic environmental assessment (SEA) screening   |
| Consultation with statutory consultees for SEA screening   | October – November 2019 | Cornwall Council undertake consultation with all statutory consultees for SEA screening.  |
| Public consultation on the draft NP at the Parish Hall   | Nov 2019                | Consultation on the draft Neighbourhood Plan at St Piran's Hall, Goldsithney in order to report progress and gain feedback from Parish communities and local stakeholders on it.  |
| Establishment of dedicated NP website for the Parish   |                         | Community volunteers worked with the Parish Council to set up a dedicated website for the Neighbourhood Plan. It provides information on the neighbourhood planning process, a summary of the NP Objectives and Policies, background information on neighbourhood planning, and links to key documents. The Parish Clerk is the point of contact for all queries and the website links to the Parish Council website for ease of navigation between the two.  |
| Revision of Neighbourhood Plan based on the results of consultation.   | January – February 2020 | Review of the comments and recommendations received from statutory consultees and from public consultation on the first draft of the NP. The NP is amended based on the feedback received, with support and advice provided from some statutory consultees for NP revision and to strengthen the evidence base for its policies.  |
| Assessment and approval of the revised draft NP by Perranuthnoe Parish Council for pre-submission consultation | June 2020               | The revised draft Neighbourhood Plan is approved by the Parish Council for pre-submission (Regulation 14) Consultation.<br><br>The meeting minutes of 15/6/2020 record the following:   |

|  |                           |   |
|--|---------------------------|---|
|  |                           | <p>The NDP has been finalised since the last meeting and is now on the website. The process for completing the Regulation 14 consultation was discussed with the following approach agreed</p> <ul style="list-style-type: none"> <li>- 8 week consultation period to recognise the impact of not being able to hold public consultation meeting due to the pandemic</li> <li>– websites to be used to publicise and collate comments on the plan</li> <li>– local information points to be used for siting of information posters on the plan and contact details for plan discussion and comment</li> <li>– social media to be used for publishing the plan and links to the website</li> <li>– note that a number of hard copies will be printed for residents who request a copy</li> </ul>   |
| Regulation 14 consultation   | July to August 2020       | <p>The consultation process involved two core components:</p> <ul style="list-style-type: none"> <li>- Consultation with formal statutory bodies, and official organisations; and</li> <li>- Public consultation with Parish residents and local stakeholders.</li> </ul> <p><u>Statutory consultees and organisations:</u> the Parish Council sent a letter and copy of the NP to all statutory consultees, and to organisations who it assesses may have a strategic interest in the NP /Parish, asking for their review and feedback.</p> <p><u>Public Consultation:</u> A core focus of the Parish's efforts was in consultation with local communities and stakeholders, to ensure that the consultation process was widely publicised and that the public had access to the information required to provide feedback on the draft NP.</p> |
| Extension of Regulation 14 due to Covid, to enable the Parish to hold a socially distanced open-day event at the Parish Hall           | September to October 2020 | The timeframe of the pre-submission consultation process is extended to make allowance for Covid restrictions, to enable the Parish to hold a socially distanced open-day event at the Parish Hall following the easing of social distancing restrictions.  |
| Review of all stakeholder feedback from pre-submission consultation process and completion of Stakeholder Feedback and Response Report | January to May 2021       | Review of all feedback received from statutory and public consultation on the draft NP by the NP Steering Group, and assessment of issues and recommendations. Follow up with some statutory consultees, and further review of data and of the policy, strategic and regulatory basis for NP policies, to support revision of the NP.   |
| Consultation with LGS landowners on final LGS proposals  | June – September 2021     | Prior to finalisation of the Neighbourhood Plan the Parish decided that it was important to ensure that all LGS landowners are aware of the final proposals to designate areas of their land  |



|   |                          |   |
|---|--------------------------|---|
|   |                          | <p>as Local Green Space. Research was undertaken to identify all landowners and the contact addresses of each individual landowner with the Parish. This included requests to Land Registry by the Parish Clerk where the details of landowners were not locally available.</p> <p>Individual letters sent to each landowner, including maps of all the proposed LGS areas, information on the NP section process, national planning provisions regarding LGS, and the reasons for their proposed designation. Feedback was received from a number of landowners, some supportive and others objecting to the proposals. The feedback received and Parish response to it, including details of any amendments made to the NP is provided in the NP LGS.</p> |
| Independent planning expert pre-submission review for Basic Conditions Statement                                    | June – December 2021     | The Parish Council commissioned an independent planning expert to undertake a pre-submission 'health check' of the Plan prior to formal submission, to provide advice and support for finalisation of the Plan and to undertake the Basic Conditions Statement.   |
| Revision of the Plan to address the feedback received during Regulation 14 consultation and to complete all Annexes | July – September 2021    | Based on the feedback received from the Regulation 14 consultation process, and the advice received from the independent planning expert, amendments are made to the draft Neighbourhood Plan to strengthen its policies and ensure it meets the Basic Conditions.  |
| Final consultation / review by Cornwall Council to confirm that the Plan is ready for formal submission             | October 2021             | The final plan is submitted to Cornwall Council Neighbourhood Planning Team to confirm that it is ready for formal submission   |
| Final amendments to the Plan, review and approval by the PC   | November - December 2021 | Final amendments to the Plan are made based on the comments received from Cornwall Council Neighbourhood Planning Team  |
| Formal submission of the Neighbourhood Plan by the Parish Council to Cornwall Council                               |                          | The NP is formally submitted to Cornwall Council as the Local Planning Authority (LPA)  |

It should be noted that alongside all the specific consultation events held, updates on NP progress were provided by Steering Group members to monthly PC meetings; these meetings also provided the opportunity for members of the public to raise questions and provide comments and input. The Parish Council website and dedicated neighbourhood planning website 'www.ourperran.co.uk' also provided a permanent awareness raising and information platform for the neighbourhood plan development process, and encouraged all interested persons to provide information / input to the process or to request further information on it, with the Parish Clerk as the main contact point.

## **DETAILED INFORMATION ON KEY EVENTS**

### **Neighbourhood Plan Scoping and Awareness Raising Open Day**

In February 2016, a Neighbourhood Plan Scoping Event was held at the Parish Hall, with presentations in the afternoon and evening. The aim of the event was to both raise awareness of the neighbourhood planning process, and to engage the Parish community further in identifying the core planning and development issues which they feel the Neighbourhood Plan should focus on, and their key objectives for the Plan.

The event was widely publicised on community notice boards, social media, the Parish website, local press and by posters in shops and prominent locations around the Parish.

The event was attended by members of the NP Steering Group and Parish Council who were available to provide information on the Neighbourhood Planning process and purpose, and to engage participants in providing information and their views on the key development planning issues which they feel the NDP should address.

At the event, Parish wide maps were posted so that participants could identify geographic areas which they identified of being of community significance or where they had planning concerns; there were information displays on neighbourhood planning, and simple survey questions were distributed where people were asked to identify their key development planning aspirations for the Parish, the issues which they felt were priorities for development planning in the Parish and any concerns they wished to raise for consideration in the NP development process.

### **Neighbourhood Plan Position Statement**

The results the 2016 scoping open day were assessed, alongside those of the 2014 NP survey, in order to identify key planning and development issues which communities had identified, and areas of particular community significance or concern. Based on this assessment, and on review of development planning concerns raised to the Parish Council over the preceding years, a Neighbourhood Development Plan Position Statement was prepared, with input by the NP Steering Group, Parish Council and support from a planning specialist. It was adopted by the Parish Council in October 2016.

The Position Statement identifies the following key planning and development issues for consideration in the Neighbourhood Plan, and the proposed 'position' of the Parish in relation them:

#### **Housing development**

- The Parish has seen significant development over recent years and currently has a significant number of plots with planning consent
- There is concern that further development will lead to settlements conjoining and this should be resisted
- A particular concern is the number of consented plots for affordable homes which are not progressing. The Parish should assess whether Cornwall Council can devolve powers to revoke planning consent for affordable housing schemes that do not progress in a reasonable timeframe, so these may be replaced by alternative deliverable proposals
- Given the number of consents granted, the only local housing requirements unmet are for affordable homes and any significant developments of open market housing should be resisted. If a small element of open market housing is required to deliver the affordable homes required (affordable led sites) these would be considered on their merits
- Any new development or redevelopment where it is increasing the built form of the existing development should contribute towards an affordable housing fund for the

Parish which could (where appropriate) be used to minimise or remove the requirement for market housing on affordable led sites within the Parish

- Any housing development should be well integrated into the surrounding landscape and settlement and be built in character with the surrounding area. Particular attention should be taken with design and finishing materials, in particular where the development is in the AONB, Conservation areas or where the dwelling is a prominent position.
- Minimising damage to or alteration of existing hedgerows and Cornish Hedges, combined with the use of traditional Cornish hedging on visible boundaries is a key element of maintaining landscape character.
- The Parish is concerned that any development should contribute to the sustainability of village life. The Parish already has a significant number of second and holiday homes. It is proposed that all new homes constructed should be the principal home of the occupier
- The centre of both Goldsithney and Perranuthnoe contains a number of homes where parking within the curtilage of the property is not possible. This along with the general increase in car ownership and traffic has led to pressures which are seriously impacting on the quality of life of many residents and in the case of Perranuthnoe harm the AONB. To ensure this is not exacerbated by development it is proposed that any housing development should be required to have parking spaces for at least two vehicles, and that the conversion or other intensification of use provides for a level of in curtilage parking adequate to meet the intended levels of use of the building;

### **Green Spaces**

- The Parish has a number of important green spaces, these are used formally for sport and recreation and others are used informally;
- Assessment should be undertaken to identify green spaces of high community significance in the Parish. Green space designation should be considered for green areas of particular importance to Parish communities, where they meet national LGS criteria. Designation will help to ensure their significance is recognised in planning and that they continue to meet the health and well-being needs of the Parish;
- Green spaces of significance identified from initial surveys within the WHS include:
  - St Piran's Hall Playing Field,
  - Goldsithney Cricket Field, Tregurtha View
  - Rosudgeon Playing Field
  - Open space Collygree Park
  - Land south of the Old Woodyard, Gears Lane
  - The green St Petry's
  - The green Tregurtha View
- Some of the important areas that benefit the Parish are just outside the Parish boundaries and it is important to seek the support of adjoining parishes to ensure these continue to benefit the Parish;

### **World Heritage and AONB**

- The Parish in its entirety is either in the AONB or in the Cornish Mining World Heritage site. The Parish believes these designations should offer essential protection to local landscapes and cultural heritage, which should be more clearly considered in planning, and needs to be supported by appropriate local policies in the NDP;
- The recently published Management Plan of the AONB is strongly supported by the Parish;

- The Parish seeks to enhance the setting of the AONB by having specific policies in relation to
  - limiting development on the boundary of the AONB, particularly the A394
  - giving additional protection to designated 'quiet lanes' at the edge of the Parish which whilst outside the current AONB contribute to the character of the Parish and the Cornish Mining Heritage area. This would include Red Lane, Primrose Lane, Lancashire Lane and Gears Lane
  - Consider more effective protection for the special characteristics of the Trevelyan Plantation

### **Development Planning Open Meetings in Goldsithney and Perranuthnoe**

Two separate open meetings were held, in recognition of the fact that the north and south of the Parish face slightly different housing, traffic, parking and congestion pressures. A core focus of the meetings was to discuss community concerns raised to the Council in previous consultations and at Parish Council meetings relative to development pressures, the impact of congestion, parking and traffic on communities, and the provision and protection of green / open space. One meeting was held at the Parish Hall in Goldsithney and in the other in St Piran and St Michael Church Rooms, Perranuthnoe village.

Key issues raised at the meetings included concerns over the limited infrastructure available to support ongoing housing development at the levels currently being experienced. Strong concerns were raised on the impact on communities of increasing numbers of vehicles parked along village lanes, causing regular blockages, including instances when services and emergency services have not been able to reach residents houses. The increasing number of cars and speed of traffic on Parish lanes was also raised as an issue of great concern relative to community safety, health and wellbeing. Options to address these issues were discussed, recognising that traffic control measures lie outside the scope of the Neighbourhood Plan. It was agreed that the Plan should include a requirement for any new development, including conversions and replacement buildings, to provide adequate space for the intended level of use of the building. Along the roadside to the A394 through Rosudgeon, the need to ensure that developments include the provision of a pavement in areas where there are none was also agreed. A proposal would be put to the Parish Council to separately pursue options for traffic calming and parking restrictions (yellow lines or bollards) for the villages of Perranuthnoe, Goldsithney and Rosudgeon.

The importance of green spaces for community health and wellbeing was also discussed at both meetings, with strong concerns voiced over loss of, and increasing development pressures on, green areas of significant local value. The need to identify and afford better protection to green spaces of community significance was identified and options to achieve this discussed. The areas proposed in the Parish Council Position Settlement were considered, and additional areas identified as being of high community significance. There was agreement that these areas would be put forward for consideration in the Neighbourhood Plan, and that further work would be undertaken to identify the attributes and significance of each area to determine whether they met the national requires for designation as 'local green space'. Areas that were found to be 'demonstrably special to a local community and to hold particular local significance', and which met the national conditions of being near to communities and not extensive in size, would be included in the Neighbourhood Plan and a Local Green Space policy developed to support their conservation.

### **Parish Charter Fair Neighbourhood Plan Consultation**

An annual Charter Fair is held in the Parish which takes place on the first Saturday of August every year, as a revival of a feast day once associated with the village of Goldsithney. The Charter Fair is an annual event with historic origins, attended by 100s of people from across the Parish and beyond. It includes a procession from the community hall to the heart of the village, led by local bands. During the day, stalls are set up along the main street, selling local wares, with music and dancing into the evening. The Parish Council provides funding and recognise and give an award to individuals who have supported the community in various ways over the year.



The NP Steering Group organised a neighbourhood planning stall at the August 2017 Parish Charter Fair, recognising the opportunity the Fair provided to raise further local awareness of and engagement in the neighbourhood planning process, and to obtain the views of the wider community on what they identify as key planning and development priorities, objectives and issues in the Parish. The Charter Fair in particular offered the opportunity to gain the input of families and younger people. The NP event at the Charter Fair was publicised via posters on Parish notice boards and in public places, on the Parish website and via social media and community forums.

On the day of the Fair a stall was set up on Goldsithney Fore Street, manned by Parish Steering Group members and community volunteers. Awareness raising material was developed and distributed from the stall and there were displays at the stall. A simple questionnaire was also developed asking for people's input on what they identified as being: the core aspects of the Parish which make it 'special'; their main development planning objectives and priorities for the Parish; and their main concerns. The individuals manning the stall encouraged people to complete the questionnaire, and also distributed questionnaires so that people could complete them at home and send them to the Parish clerk. The stall generated a lot of interest and the volunteers were permanently discussing with people throughout the day.

The responses to the questionnaires were reviewed and provided important further information on local peoples' development planning objectives, priorities and concerns for the Parish. Many of the points raised followed similar themes to the input received from previous scoping consultations. The following is a synthesis of key points raised:

Aspects of the Parish most valued:

- Small cohesive, vibrant rural communities and community spirit
- The natural beauty of landscapes, and stunning views over coastal landscapes
- Local agricultural and mining landscapes / views
- The agriculture and mining heritage of the Parish; the small field systems, stone walls and the fact that farming is still the main activity / land-use across the Parish
- Small dispersed settlements and hamlets
- The network of footpaths across the Parish and the SW coast path; their setting within natural, agricultural and historic mining landscapes, and the stunning views from them
- The sense of local mining and farming history across the Parish due to heritage buildings and landscapes

Objectives for the Parish

- Conserve small communities
- Conserve natural beauty
- Conserve local and traditional character / feel of the Parish / local sense of place
- Protect the fragile natural environment, wildlife and green spaces
- Future development and changes to existing buildings should be in-keeping with the local heritage character of the Parish
- Protect green spaces around hamlets and conserve open countryside
- Protect footpaths and the views from them, so they can continue to be enjoyed by all
- Local people should continue to be able to afford homes and to live in the villages
- Make sure across the whole parish that any buildings and developments do not detract from or obstruct views and do not change the character of the landscapes.
- Support farming systems to thrive. Retain small fields and agriculture systems
- Keep it green - more trees and tree lined roads
- Make sure planning is long-term - Conserve the beauty and local character of the Parish for next generations

Issues of concern:

- Overdevelopment and impact on communities and landscapes
- The need stop 'ad hoc' housing developments in countryside
- Conserve / provide more community green spaces

- Development scale / style eroding the traditional character of areas and natural beauty and character of local landscapes
- Intrusive building designs and scales
- Local infrastructure cannot cope with more housing / facilities are inadequate to support development/ Inappropriate sewage/drainage for more development
- Excess of traffic and gridlocks. The main road is used as a race track.
- Excessive new housing / unrestricted building and commercialisation of rural areas
- Parking pressures
- Goldsithney should not become an extension of Marazion / importance of conserving the fields between
- Increasing holiday homes / lets eroding communities and putting housing out of the price range of local people
- Visually intrusive development impacts on landscapes / settlements, especially a problem in coastal areas
- Current weak protection for natural resources from development impacts
- Pollution on the beach
- Caravans being left in fields permanently and no enforcement action taken
- Loss of traditional places and buildings / Parish heritage
- Concerns about the building/planning consents that have been allowed to happen over the last few years; 'residents views / opinions are not listened to by Planning Dept, money seems to be talking'.
- Importance of farming, agricultural land and landscapes, and concerns that there may be pressures on agriculture, making it more difficult for farmers to make a viable living.

The responses from the Charter Fair stall were similar in many ways to the issues and priorities highlighted in the previous community NP scoping surveys.

Following review of community input to all scoping surveys and consultation events to date, the Steering Group identified the need to commission professional studies to establish a sound baseline for the design of NP policies relating to development impact on local landscape character across the Parish, and relative to the concerns repeatedly raised over 'development sprawl' into the countryside and AONB / WHS landscapes and the need to conserve cohesive, geographically bounded settlement areas.

The Steering Group proposed that the Parish Council seek grant funding from the government to advance the NP development process, and that the Parish commission two independent professional studies:

- Local Landscape Character Assessment
- Settlement Boundary Assessment.

### **Settlement Boundary Assessment and Development Boundaries Consultation**

A key issue emerging from the NP scoping consultations was concern over increasing levels of 'development sprawl' out from villages and hamlets into the open countryside. Public concerns were linked to the detrimental impacts of this on village and community cohesion; access, congestion, services and facilities; long-term community welfare; the Parish's green infrastructure and spaces; local sense of place; and on the social, economic and environmental value of AONB and WHS landscapes.

The Steering Group reviewed local planning guidelines, other Parish's neighbourhood plans and subsequently consulted with Cornwall Council Neighbourhood Planning Team, on the potential to define Settlement / Development Boundaries within the Neighbourhood Plan as a local area planning tool to help clearly define where development should be focussed, so that it works positively to meet local housing needs in a way that consolidates communities, avoids or limits development creep into the open countryside' and supports the conservation of AONB / WHS landscapes.

It is important that development boundaries are established following assessment of likely housing needs over the lifetime of the NP, and following assessment of CC local housing targets. A review of housing data, housing targets for this area, and of national and county policies and guidelines was therefore undertaken in order to fully understand the potential of settlement/development boundaries to help achieve more locally responsive and sustainable development. The Parish Council engaged a Cornwall Council planning expert to undertake a settlement boundary assessment for the Parish. Criteria were drawn up for the delineation of Development Boundaries, based on national and county guidance, and a review of criteria used by other Parishes. Details of the process are provided in the core of the NP document.

The settlements in the Parish were identified as Goldsithney, Rosudgeon, Perran Downs and Perranuthnoe villages. Development Boundaries were identified to guide the future location of development over the life of the NP; these are core to the NP Development Policy to help ensure that development works positively to consolidate settlement areas, and to restrict further development sprawl into AONB / WHS landscapes.

Initial consultation on Settlement Boundaries was undertaken at the start of 2018, with maps available for review on the Parish Council website between January and March 2018. The consultation was undertaken through the Parish Council website and at meetings, and the process was publicised on Parish notice boards, website and via community forums and social media. Consultees were encouraged to provide feedback to the Parish Clerk and at PC meetings.

Subsequent consultations on proposed Development Boundaries were undertaken:

- as part of the review of the first draft of the NP by statutory consultees (October / November 2019) and with local communities and stakeholders through a Parish open meeting in November 2019;
- as part of pre-submission consultation with all stakeholders on the draft NP between July and October 2020 (Reg 14 consultation).

The majority of public and statutory consultee feedback received demonstrated clear support for the Development Boundary policy and for the boundaries proposed. Feedback indicated that the majority of consultees felt that the policy provides the strategic guidance needed to consolidate development within core settlement areas, provides adequate space to meet likely housing needs over the life of the Plan, and would work positively to help reduce the negative impacts of development sprawl out from villages and hamlets into the open countryside.

However, the feedback received from both public and statutory consultees also included some specific concerns and objections:

Natural England (NE) raised concerns about a large garden plot originally included within the proposed southern coastal edge of the Perranuthnoe village Development Boundary. The land area extended out into the coastal AONB landscape. NE objected to the inclusion of this area of land within the proposed Development Boundary of Perranuthnoe village due to the fact that a) the land is in a visually prominent site within the AONB coastal landscape, and development on it would run counter to national and county planning policy for AONB; b) inclusion of land within this coastal zone does not align with the policies in the Shoreline Management Plan.<sup>1</sup>

The Steering Group and Parish Council reviewed the land in question and NE's concerns and agreed that the inclusion of an area of land extending out into the coastal AONB landscape was not in line with national and county policies for AONB, nor with the Shoreline Management Plan. It also ran counter to the Parish Development Boundary designation criteria. The Parish Council agreed that it was inappropriate to include it, and the contested area of land was removed from the proposed Development Boundary for Perranuthnoe village in the revised NP. The Parish also emphasise that they recognise that the Development Boundaries proposed in the NP should be used within the context of the broader planning framework and provisions for the conservation of natural landscape character and scenic beauty inherent in AONB designation. There is no intention for the Development Boundaries proposed in the NP to over-ride the protection afforded to AONB landscapes.

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<sup>1</sup> Please refer to the SEA consultation feedback and parish responses appended to this consultation statement

A number of concerns were also raised by individuals who own land at the edge of the proposed development boundaries for Rosudgeon, Goldsithney, Perran Downs and Perranuthnoe, with requests that areas of their land be included within the boundaries. A few landowners voiced strong objections, and proposed that their land should be prioritised for development. The Steering Group and Parish Council reviewed all comments and objections received, and assessed them against the Development Boundary criteria. In two instances, where the land in question was small in size, and not in a prominent location, it was agreed that it might be reasonable to make small changes to the Boundary without contravening the delineation criteria or policy objective. Members of the Parish Council undertook site visits and met with the landowners to discuss their concerns and to gain a clearer understanding of their development intent. The decision was made to make small revisions to the Development Boundaries in each case. In the other cases it was assessed that it would not be reasonable to include the contested land within the Development Boundaries as the areas were substantial in size and located in prominent positions, not clearly part of gardens, and was not therefore in line with the Development Boundary delineation criteria.

One consultee also raised concerns relative to the risk of creating conditions of overcrowding within settlements if Development Boundaries are drawn too tightly, and development is permitted within gardens. The comments were reviewed, and amendments were made to strengthen HTA1 policy provisions requiring consideration to be given to ensuring that the size, layout and location of new development does not result in overcrowding, or unacceptably compromise the amenity value of neighbouring properties or public assets.

### **Principal Residency Survey**

Scoping studies for the NP highlighted the great value which local people place on maintaining vibrant and cohesive communities in the Parish. A concern raised repeatedly by members of the community was the increasing levels of buy-up of housing for second homes or as investment property for holiday lets. This is particularly an issue in coastal AONB areas of the Parish. There is widespread concern that this is eroding communities in and around Perranuthnoe village, and that these areas of the Parish may become ghost villages / hamlets. Consultees pointed to increasing trends for this in other coastal areas in Cornwall where villages are full of tourists in the summer and holiday periods and empty for many months of the year. It was clear that Parish residents place a strong priority on retaining a 'core community' of residents within villages and hamlets.

Cornwall Council Planning Department were only able to provide data from the 2011 census<sup>2</sup>, which shows that at that time the number of non-residential properties in the Parish was between 28 to 38% in the AONB area (south of the A394) and 6-8% in the WHS area (to the north of the A394). The Planning Department no longer collate or refer to any data which differentiates between houses used as permanent residences and those used as holiday-lets and second homes, so they were not able to provide any updated information.

As current data was not available, the Steering Group decided to undertake a Parish survey to calculate the number and ratio of local residences to holiday lets and second homes. A desk-based assessment of properties within the Parish that are listed as holiday lets by local agents, on AirBnB or on private websites was initially undertaken. It became clear that the coastal AONB area of the Parish is that which is most affected, and has seen the greatest increase in buy-up of property for second homes and holiday-lets, with associated huge increases in property value over the last 10 years.

The initial desk-based assessment was then followed up with a detailed house to house 'on the ground' assessment in the AONB areas of the Parish by community volunteers who were long-term local residents with good knowledge of which houses are lived in and which are holiday lets or second homes. This enabled the Parish to identify the area most affected. The results of the house-to-house survey largely tallied with those online, providing clear data to support development of an NP principle residency policy. As in many other parts of Cornwall, it is the coastal areas that are most affected:

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<sup>2</sup> The 2021 census was ongoing at the time of finalisation of the draft NP, but the data not yet available.



| HOLIDAY LETS & SECOND HOMES AS A % OF OVERALL HOUSING |     |
|---|-----|
| Perranuthnoe village                                  | 49% |
| Trenow  | 80% |
| Trebarvah   | 42% |
| Ednovean  | 71% |
| Acton Castle  | 50% |
| Trevean   | 24% |

The zone most affected is that to which a principle residency policy has been applied in the NP. Currently 43% of housing in the area outlined in Policy Map CW4 is not lived in as a residence, but is being used as holiday-lets and/or second homes.

### **Local Landscape Character Assessment**

A key priority emerging from public consultations was the value which local communities place on the natural and heritage character of local landscapes, and on the Parish's green infrastructure, local green spaces, historic landscapes, access to them on PROW and views from them. These were repeatedly underlined as being core to 'local sense of place', to peoples' health and well-being and to what makes the Parish so valued by both the local community and visitors. Strong public concern was voiced over increasing development impact on local AONB and WHS landscapes, with two key issues of concern repeatedly highlighted

- increasing 'development sprawl' out from settlements and hamlets into AONB / WHS landscapes, and
- incongruous and visually intrusive building designs and scale that are out of character with their setting, and which visually impose on the natural and local heritage character of landscapes.

There was a clear recommendation from public consultation on the need to ensure that within planning there is improved recognition of the value of local landscapes, that weight is given to their designated status as AONB and WHS, and that planning is based on an understanding of local landscape character, valued local assets and of what is valued and why.

To provide a clear baseline and information to support policy design within the NP, a Local Landscape Character Assessment (LLCA) was commissioned, undertaken by a leading landscape architect. The purpose of the LLCA was to provide core baseline data and assessment to help ensure that future development in the Parish is based on an understanding of the value and character of local landscapes and assets.

The Perranuthnoe Parish LLCA provides a comprehensive assessment of landscape character across the Parish, it examines patterns of land-use, key landscape characteristics, natural and heritage features, topography, habitats, biodiversity and 'aesthetic and sensory' qualities, including descriptions of views, public areas and rights of way. It includes an assessment of the character of the small hamlets scattered in amongst these rural landscapes, and of the edges of the main settlements in the Parish, examining the extent to which the built environment blends in with and complements the wider rural landscape. The LLCA examines the impact of patterns of housing development and land-use on landscape character across the Parish. It identifies areas where development has had a negative impact on landscape character and provides recommendations on how to ensure that future development planning works to avoid adverse impacts. The LLCA is appended to the NP.

Consultation with local communities informed the LLCA process. Section 6 of the LLCA document outlines the issues and priorities which communities emphasised relative to the value of local landscapes, concerns over development impacts on them, and priorities for consideration in future sustainable development planning. In summary community responses highlighted:

The strong value which local people place on:

- the natural beauty and local heritage character of landscapes across the Parish, access to them, and the importance of this to communities' health and wellbeing.
- the wild coastline, coves and beach

- agricultural landscapes, both as part of the character of local landscapes, and the importance of conserving sustainable agriculture
- hedgerows, trees, Cornish Hedges and wildlife
- community green spaces, including allotments
- the heritage character of landscapes and buildings, including mining sites and features and the 'local feel' of villages

Public concerns relating to current levels and patterns of development, including for housing, commercial and campsites / holiday accommodation, relative to:

- 'Overdevelopment' and the negative impacts on rural landscapes and on communities
- The negative impact of buildings that are out of character with Parish landscapes and settlements, and are not well integrated into their surroundings
- the loss of areas / buildings of historic character and the impact of this in eroding local sense of place and heritage assets
- Loss of hedgerows, Cornish Hedges and trees
- The need to maintain the edge of settlements as clearly defined, and to limit development 'sprawl' into rural landscapes
- The spread of second homes and holiday lets
- The negative impact of current levels of development in exacerbating traffic and parking pressures and service availability. The lack of infrastructure and services available to support current levels of development.
- The need to ensure agricultural land is not lost to buildings
- The need to afford stronger protection to natural / rural landscape conservation across the Parish

The LLCA effectively captures community opinion on the importance of local landscapes and landscape assessment for development of the Neighbourhood Plan stating that: *'Landscape is about the relationship between people and place, and is the setting for our lives. Through landscape character assessment we can gain an understanding of what elements of the character are important and have value, to help in the decision-making process.'*

The LLCA provided a key baseline document for the NP, with detailed professional assessment of the unique combinations of elements and features that come together to create 'sense of place' and 'local distinctiveness'. It includes maps and descriptions of key landscape features including: landscape types, designated areas, habitat types, quality of agricultural land, footpaths and rights of way, Cornish Hedges, heritage assets and historic landscape characterisation, areas of importance for wildlife and features of biodiversity conservation importance. The LLCA report highlights 'landscape management and development considerations' for each landscape area. In doing so it draws directly on the information, concerns, priorities and recommendations of local communities, as well as on professional assessment.

### **Appraisal of Local Heritage Assets**

One of the priority issues that emerged from the NP consultation process is the value which local communities place on the local heritage character of landscapes, historic buildings and settlement areas across the Parish, both as being core to local 'sense of place', and as part of Parish communities' heritage. Consultation results also highlighted strong local concerns over the increasing impact of insensitive development where this encroaches on areas of local heritage value or on the heritage character of landscapes or settlement areas in the WHS and AONB. It is clear from consultation responses that heritage assets are seen as an important, irreplaceable resource, core to local 'sense of place' and community identity, and that there are concerns over loss of these assets through insensitive and ill-informed development.

The Local Landscape Character Assessment (LLCA) also highlights the importance of heritage assets and landscapes across the Parish as being core to the distinctive character of local WHS and AONB landscapes. It is a key baseline document for the NP, which also draws on the results

of public consultation. The LLCA includes a map outlining areas of particular heritage significance within Parish landscapes.

In the northern WHS areas of the Parish the LLCA provides important recommendations on how planning can work more positively to conserve the local heritage character of WHS landscapes recommending that: 'reference needs to be made to the attributes of this (WHS) designation when considering new development' and that 'protection of the attributes should be a key consideration in the management of the WHS, particularly in spatial planning and management decisions. It highlights the importance of 'ensuring that new features match the local vernacular using locally occurring materials' and of 'retaining the strong field pattern of Cornish hedges and the native vegetation they support', 'reflecting the field sizes and retaining and enhancing the field pattern'.

In AONB areas of the Parish, the LLCA raises concerns that: 'recent development in the area and the expansion of Perranuthnoe to the east is affecting the character of the undeveloped coastal hinterland and the traditional character of historic farm and mining settlements in the area'...and that 'dwellings within this landscape type which do not appear to relate to historic settlements have created a peppering of dwellings which detract from the character of the coastal hinterland'. It recommends that it is important to 'ensure all management and development of land across this area supports AONB policies to prevent any development that is out of character or scale and negatively affects the AONB.'

The results of community consultation and the LLCA underlined the need for the NP to include provisions that will help to ensure local development planning recognises the value of the heritage character of landscapes and settlement areas within both the WHS and AONB areas of the Parish, and works positively to conserve heritage assets of significant local value.

A heritage assessment process was undertaken to identify the core features of heritage landscapes and settlements in the Parish, following Historic England's guidance on Local Listing & Historic Area Assessments, Site Allocations in Local Plans, Conservation Area Appraisal and Neighbourhood Planning and the Historic Environment. The heritage appraisal process is detailed in the NP Heritage Appraisal document appended to the NP.

The heritage assessment and appraisal process provided important information for the development of policy provisions within the NP to help address the concerns raised through public consultation, so that development planning recognises heritage assets of significant local value, considers development impact on them, and works positively to conserve the local heritage character of landscapes, settlements and assets within the WHS and AONB areas of the Parish.

### **Consultation with Local Green Space (LGS) Landowners**

The process followed for identification of areas proposed for designation as Local Green Space is detailed in the specific LGS Appraisal document appended to the NP. This also details the feedback received from landowners of proposed LGS, and the Parish response to the feedback received, including where changes have been made to the NP LGS policy (CW3).

Prior to finalisation of NP Policy CW3 the Parish Council contacted all landowners of proposed LGS areas, to ensure that they are fully aware of the final proposals. Research was undertaken by the Parish Clerk to identify all landowners and their contact addresses, requiring official requests to be sent to Land Registry where the details of landowners were not locally available.

Individual letters were sent to each landowner which included maps of all the proposed LGS areas, information on the national planning provisions regarding LGS and the reasons for their proposed designation. Feedback was received from a number of landowners, some supportive and others objecting to the proposals to designate the land as LGS. The landowner feedback and way in which the NP has responded to this is outlined in Table x within the LGS Appraisal document.

### **Neighbourhood Plan Drafting**

The results of public consultations between 2014 and 2019 revealed a pattern of recurring themes with similar development aspirations and priorities for the Parish repeatedly cited by consultees, alongside similar development planning issues and concerns. Subsequent appraisals and focussed consultation on high priority issues provided further detail to inform policy development.

The issues and recommendations raised by members of Parish communities at Parish Council meetings were also considered, alongside an assessment of issues raised on local planning applications, recognising that this represents 'planning in action'; this helped to further contextualise the issues and concerns raised in NP scoping consultations.

The LLCA provided core baseline data and assessment to inform the development of NP policies. The settlement boundaries assessment was also key, providing clarity as to how and where development could be focussed over the life of the Plan, in a way which would work positively to consolidate settlement areas, meet local housing needs, and reduce development creep into AONB and WHS landscapes.

Additional data, and advice from specialists and sectoral agencies was important across a number of policy areas, in particular to generate a clear understand of local housing needs, targets and development patterns across the West Penwith rural area; the proportion of houses used as holiday-lets and / or second homes, and the areas of the Parish most affected; local green space areas of significant value to local communities; environmentally sensitive areas and habitats; local heritage assets and landscapes of significant local value; flooding risks; coastal erosion rates and areas that will be most affected.

This local assessment process provided a clear focus to support drafting of Neighbourhood Plan Objectives and Policies. NP policy development also required extensive review of national, county, AONB and WHS development planning policies, strategies, regulations and guidelines, and of national and county guidance on neighbourhood planning, to understand the scope for neighbourhood planning to address priority issues. Consultation with Cornwall Council Planning and Sustainable Development Service, and with specialist planners, provided additional clarity, advice and information. The review of other neighbourhood plans and liaison with other Parishes was also very helpful in guiding NP policy development.

The comprehensive overall assessment process supported the drafting of a Neighbourhood Plan for the Parish in the summer and autumn of 2019. Alongside each policy, a summary of the results of the assessment has been captured, to record the 'evidence base' and strategic / regulatory 'justification' for the policy. The Steering Group felt that it was important to include this summary, in order to provide information for developers, decision-makers and all those interested in development planning considerations in the Parish, to explain the broader strategic context, and how the policy responds to priority issues raised by public and statutory consultees, and builds on the data and analysis in key baseline assessments.

### **Public Consultation on the First Draft of the Neighbourhood Plan**

An Open Day was held at the Parish Hall in November 2019 to consult with local communities and stakeholders on the first draft of the NP. The event was widely publicised with posters on all Parish notice boards and at bus stops, and flyers distributed to local shops and businesses. Information was also distributed through social media. The open day was timed to coincide with the Parish Christmas Fair and attracted considerable community interest. A table was set up in one area of the Fair with hard copies of the Plan available for review, displays with information on the NP process and large-scale maps showing proposed Development Boundaries; Local Green Space areas; Heritage Assets; and the area proposed to be covered by the Principal-Residency policy. Hard copies of the LLCA were also available. Post it notes were available at the stall, and members of the public were encouraged to post comments on the maps and displays. Feedback response sheets were also available for people to write comments and share their feedback. Parish Councillors were in attendance at the Open Day as were volunteers from the NP Steering Group, who were on-hand to answer questions and provide any information or explanation required. People were encouraged to provide feedback at the event, and / or to provide feedback to the Parish clerk after the even, by the end of the year. The draft NP document was also uploaded to the Parish and NP websites for public review, alongside a summary of the process to date and request for public comment on the first draft.

The feedback received from local consultation on the first draft of the NP indicated strong overall support for it and its policies. A number of recommendations were received on additional areas to be considered as local green space. Specific concerns were also raised relative to areas of land within the AONB, where agricultural land had recently been sold, and was being used by the

new owners for the permanent placement of caravans and shepherd's huts. The land in question was in visually prominent coastal locations next to PROW, and community members raised concerns that this was not agricultural use of the land, and visually intrusive and not appropriate. They raised concerns about the lack of enforcement of this use of land, and emphasised the importance of policy within the NP providing appropriate planning guidance to ensure that private caravans are not left on agricultural fields as a type of holiday property. There were requests for further work be done to assess the planning policy position regarding the use of agricultural land for non-agricultural purposes, in particular relative to long-term placement of caravans when their use was not associated with agriculture. All feedback received was reviewed by the Steering Group and further local assessment and national / county policy review was undertaken to determine how the NP could be strengthened to address the issues raised.

## **SCREENING FOR STRATEGIC ENVIRONMENTAL ASSESSMENT**

In October 2019, the Parish Council submitted the draft Neighbourhood Plan for SEA screening. All Neighbourhood Plans must be assessed<sup>3</sup> in order to determine whether SEA is required. Stage A of the SEA process is 'screening' by relevant agencies to determine whether the Neighbourhood Plan is likely to have significant environmental effects. National Guidelines specify that: 'Not every Neighbourhood Plan needs SEA...as a rule of thumb SEA is more likely to be necessary if both of the following two elements apply:

- a Neighbourhood Plan allocates sites for development (for housing, employment etc.); and
- the neighbourhood area contains sensitive environmental assets (e.g. a Site of Special Scientific Interest (SSSI) or an Area of Outstanding Natural Beauty (AONB)) that may be affected by the policies and proposals in the Neighbourhood Plan.<sup>4</sup>

A large area of the Parish is designated as an AONB. SEA was therefore particularly important for Perranuthnoe Parish.

Under the Habitats Regulations an 'appropriate assessment' must also be undertaken if the Neighbourhood Plan is likely to have a significant effect on a European protected wildlife site. The SEA Directive requires that if an eligible plan or programme requires an appropriate assessment under the Habitats Directive, then that Plan will also require an SEA.

Cornwall Council circulated the draft NP to all statutory SEA consultation bodies to ask for their assessment. The overall feedback received from consultees was positive with some helpful recommendations on ways to strengthen the Plan and its policies. One significant concern was raised by Natural England, as the body responsible for AONB. This was relative to an area of land within the proposed Development Boundary for Perranuthnoe. NE raised the concern that the lands was in a visually prominent site within the AONB, adjacent to the south coast footpath and that any development of this land would run counter to the objectives of the AONB and to AONB Management Plan policies. Inclusion of the land within the development boundary would run counter to the Cornwall and Isles of Scilly Shoreline Management Plan (SMP)

The NP Steering Group reviewed the comments in relation to the area of land in question and agreed that it had been mistakenly included due to being part of a 'garden' and on steeply sloping land which had not been considered as suitable for development. They agreed that its inclusion ran counter to AONB policies, the SMP and to the criteria established by the Parish for delineation of Development Boundaries. They provided advice to the Parish Council who agreed that it was not appropriate to include the land area within the proposed Development Boundary and. The boundary was amended to address the concerns raised by NE.

The feedback received from all statutory consultees, and the way in which the Parish amended the NP to respond to them is provided in Appendix 2 to this Consultation Statement.

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<sup>3</sup> Under the Environmental Assessment of Plans and Programmes Regulations 2004

<sup>4</sup> Locality Guide: 'Screening Neighbourhood Plans for Strategic Environmental Assessment; a toolkit for neighbourhood planners'

SEA Regulations require the 'responsible authority' to 'determine' whether or not a Neighbourhood Plan is likely to have significant effects, and therefore whether SEA is required. Cornwall Council as the Local Planning Authority (LPA) are the appropriate authority. Following review of the revised NP, Cornwall Council issued a screening decision notice which confirms that 'Based on the scale and location of development proposed in the draft plan, Cornwall Council is of the opinion that the Perranuthnoe Parish NDP, is unlikely to have significant effects on the environment and that SEA and HRA are therefore not required. This view has been confirmed by the statutory bodies.' The SEA and HRA screening report and decision letter is appended to the Basic Conditions Statement.

## **CONSULTATION WITH THE LOCAL PLANNING AUTHORITY ON THE FIRST DRAFT OF THE NEIGHBOURHOOD PLAN**

Following the SEA and HRA screening process, members of the Parish Council met with the LPA in order to gain their feedback on the draft Neighbourhood Plan and to seek their advice on ways it could be strengthened. Extensive and useful discussions were held, which supported the Parish in amending the draft Plan. A summary of the feedback received from the LPA, and the Parish response to it, with a summary of amendments made to the Plan, is provided in Appendix 3 to this Consultation Statement.

The draft Neighbourhood Plan was revised, based on the feedback received from consultees during the SEA/HRA screening and that from the LPA, and following further discussions and support from the LPA and specialised agencies within Cornwall Council. The revised draft Neighbourhood Plan was then put out for an extensive period of public and statutory consultation: Regulation 14 pre-submission consultation.

## **REGULATION 14 PRE-SUBMISSION CONSULTATION**

Neighbourhood planning regulations (regulation 14) require that there is a consultation period of a minimum of 6 weeks, undertaken by the qualifying body (the Parish Council), before the Plan is formally submitted to the local authority for independent examination. The Parish Council should:

- publicise it in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area
- consult any consultation body referred to in paragraph 1 of Schedule 1 whose interests the qualifying body considers may be affected by the proposals for a neighbourhood development plan
- send a copy of the proposals for a neighbourhood development plan to the local planning authority

The revised draft NP was approved by the Parish Council for pre-submission consultation in the spring of 2020. The NP Steering Group were responsible for organising the consultation process and put considerable effort into developing consultation material and a strategy that would ensure that it was organised and executed in a way that would be widely publicised to reach as many people as possible.

A pre-submission response questionnaire was developed by the Steering Group to ensure that respondents included all required information in the feedback provided. This followed a similar template to that used by other Parishes:

Part A of the questionnaire asked for the individual's name and contact details, and their connection with the Parish. People were asked to identify whether they were: *resident in the Parish; a non-resident property owner; a land owner; resident in an adjacent Parish; employed in the Parish or an employer in the Parish.*

Part B asked individuals to provide their comments and feedback on the Neighbourhood Plan: *'Please let us know whether you consider that the draft Neighbourhood Plan provides appropriate planning guidance for this Parish.*

*Does the Neighbourhood Plan cover the planning issues which you feel are most important here?*

- *If so, which are the issues and policies that you feel are most important?*
- *If not, what do you feel is missing or incorrect and why?*

*If your comments relate to a specific policy, map or paragraph, we would be grateful if you could quote the policy, map or paragraph number.'*

The form that was used is appended to this Consultation Statement within Appendix 6.

The Steering Group also prepared a leaflet which provided a brief summary of the Neighbourhood Plan objectives and policies, and the consultation process.

In 2020 the country was in the grip of the Covid epidemic with restrictions on social gatherings. This presented the Parish with a challenge and the decision was made not to hold any large-scale gatherings or events, but to focus instead on online consultation, and local house to house information dissemination.

The consultation process was initiated on 6th July 2020, with an initial deadline for responses set for the 6<sup>th</sup> September (8 weeks).

There were two components to the pre-submission consultation process: consultation with formal statutory bodies, and affected organisations; and public consultation with Parish residents and local stakeholders.

A significant number of responses were received during the initial 8-week consultation period. However, the NP Steering Group were concerned about the impact of Covid restrictions on the consultation and engagement process, in particular due to the fact that there had not been the opportunity to hold a local consultation event. With the easing of lockdown restrictions, the Steering Group proposed to the Parish Council that the consultation period be extended, and that the Parish hold a consultation event at the Parish Hall. An extended timeframe would also provide the opportunity to further publicise the consultation process locally, and to follow up with any statutory consultees who had not yet responded. The Parish Council agreed that the timeframe for consultation be extended until the end of October 2020. The overall timeframe allocated by the Parish for pre-submission consultation on the draft Neighbourhood Plan was therefore extensive and way beyond that required by Regulation 14; it covered the period from July to October 2020.

#### Consultation with statutory consultees

Cornwall Council shared a list and the contact details of all statutory consultees with the Parish, the Steering Group reviewed it to ensure that all relevant statutory organisations were on the list, and the Parish Council subsequently sent a copy of the draft plan to all statutory consultees, along with a letter requesting that they review and provide feedback on the Neighbourhood Plan.

The comments received from statutory consultees are provided in Appendix 4 to this Consultation Statement. The overall feedback received was extremely positive, with a number of helpful suggestions on ways to strengthen the Plan and its policies prior to formal submission. The Response Table in Appendix 4 includes a summary of the way in which the Parish has amended the Plan in response to the comments received.

#### Consultation with additional organisations

The Steering Group assessed whether there were additional non-governmental or specialist organisations with interests in the Parish, who might be interested in reviewing the NP and its policies. A number of additional organisations were identified and the formal consultation letter and copy of the NP also sent to them. Additional organisations consulted include: Cornwall South West Coast Path Association; West Cornwall Footpaths Preservation Society; Cornwall Countryside Access Forum; Country Land and Business Association; Cornwall Heritage Trust; Cornwall Archaeological Society; West Cornwall Dark Sky Partnership; Community Land Trust; Cornish Biodiversity Network; the Guild of Cornish Hedgers; and the Farming and Wildlife Advisory Group (FWAG) South West. Appendix 4 also includes the responses received from these organisations. Again, overall feedback was positive, with a number of helpful suggestions on ways to strengthen the Plan and its policies prior to formal submission. The table again



provides a summary of the way in which the Parish has amended the Plan in response to the comments received.

#### Local consultation with Parish residents and stakeholders

A core focus of the consultation effort was at the local level, to ensure that all those who live, work or run businesses in the Parish have had the opportunity to comment on the draft NP before it is formally submitted.

Due to the restrictions imposed by the Covid epidemic, the core focus of the consultation and engagement process was initially online, via the Parish Council and dedicated NP websites and through social media, as well as through local house to house information dissemination.

Considerable work was undertaken by Steering Group members and by community volunteers to ensure that the process was widely publicised, and that the public had the information needed to be able to respond clearly. The Steering Group prepared posters, flyers and information leaflets, which were sites on all Parish notice boards, at bus stops and on lamp and electricity posts around the Parish; flyers and information leaflets were distributed to local shops and businesses. The posters and flyers were designed to be eye catching, and directed people to the dedicated Parish NP website for further information, and to the Parish clerk for any specific queries or to request a hard copy of the Plan. Information was also disseminated on village websites and community social media sites, alerting people to the NP pre-submission consultation process and encouraging people to engage in it.

Examples of the material developed for the pre-submission consultation are incorporated within Appendix 6 of this Consultation Statement.

The dedicated Parish NP website 'www.ourperran.co.uk' provides detailed information about the Neighbourhood Plan, its objectives and policies, the overall Plan development process. It also provided detail about the Regulation 14 pre-submission consultation process, how people could engage in it, how they could access information, and links to further information. All documents, including the Neighbourhood Plan, Reg-14 Feedback Form, the NP summary leaflet, and the LLCA are available for download from the site. Key documents remain available for public review. The website can be consulted via the following link: <http://www.ourperran.co.uk/>

The Parish Council website also provides overall information on the Neighbourhood Plan, with key documents also available for download from that website, including the NP, Summary information leaflet and LLCA. The Parish Council website also provided information on the pre-submission consultation process, with copies of the Regulation 14 Feedback Form available for download. The Parish Council website was linked to the dedicated NP website enabling consultees to easily migrate between the two sites. The Parish Clerk was the lead point of contact for the Regulation 14 consultation process, providing further support and information to support Parishioners in engaging in it. The website can be consulted via the following link: <https://www.perranuthnoepc.info/perranuthnoe-neighbourhood-development-plan/>

100 hard copies of the Neighbourhood Plan were printed for distribution to Parish residents and interested parties, with provisions made for this to be done through a Covid safe process. Copies were also available to consult in the Parish Council office, and individuals were invited to contact the Parish Clerk to request a copy to be delivered to them, if they were unable to visit the office. Over half of the hard copies of the NP were distributed to village residents, and were subsequently circulated between residents informally.

Hard copies of the flyer, pre-submission consultation Feedback Form, and NP summary leaflet were also distributed to households across the Parish. They were delivered by Steering Group and Parish Council members, and by community volunteers, which also provided the opportunity for members of Parish Communities to ask questions in a Covid safe manner. The direct engagement of community members in circulating documents, sharing information and publicising the pre-submission consultation process also itself helped to raise awareness and encourage community participation in it.

In October 2020, following the easing of social restrictions, a socially distanced consultation Open Day was organised at the Parish Hall. An event facilitator was contracted to organise the event in a Covid safe manner, and work was undertaken by the Steering Group to develop information displays and material for it. The Open Day was organised with socially distanced tables, management of numbers of people entering the hall, and a clear circulation stream to ensure that distance was maintained between groups of people. Hard copies of the Plan were available for review and the NP summary leaflets were available for consultees to take away with them. The pre-submission consultation Feedback Forms were distributed to all visitors along with pens. Consultees were encouraged to complete the Forms at the event, or had the option of taking them home to submit to the Parish clerk. Large-scale maps showing proposed Development Boundaries; Local Green Space areas; Heritage Assets; and the area proposed to be covered by the Principle-Residency policy were on display around the Hall. Members of the NP Steering Group and Parish Council attended the event and were available to provide information and to respond to any queries.

The pre-submission consultation and awareness raising process generated a significant level of interest in the Plan. All comments received from the 16-week public consultation process are provided in Appendix 5. The Response table also highlights how the Parish has responded to the feedback received, detailing where changes have been made to the Plan.

The public consultation response demonstrated overwhelming public support for the Neighbourhood Plan, with some recommendations on ways to strengthen or clarify the policy guidance provided. A small number of objections were also received, in particular relative to the proposed Development Boundaries and a Local Green Space area, where individual landowners felt that this limited the options available to them to develop the land.

The majority of comments received from local residents stated their support for the Plan as a whole, a significant number of respondents emphasised the particular importance of specific policies. Those most frequently cited as being of key importance are the policies establishing: Development Boundaries (policy HTA1); Local Green Spaces (policy CW3); Building Design criteria (policy BDL1); the Conservation of Heritage Assets and the Local Heritage Character of landscapes and buildings (policies HCA1, 2, 3 and in policy BDL1); improved Spatial Planning and consideration of the Cumulative Impact of Development (policy CW5); policy guidance for Replacement Buildings and Conversions (policy HTA2); policy provisions for Affordable Housing (policy HTA3) and the strong focus of the Plan on the importance of conserving Biodiversity, Natural Landscapes and the Parish's Green Infrastructure (all policies under Objective 4). Within the objections received, the majority relate to proposed Development Boundaries for Goldsithney and Rosudgeon (policy HTA 1) by landowners who own property outside the proposed boundaries.

The following tables present the feedback received from statutory and public consultees. It details how the Parish has acted upon the feedback received and whether changes were made to the Plan as a result of those comments.

## **CONCLUSION**

Neighbourhood planning is an inclusive approach, providing the opportunity for Parish communities, local businesses, organisations and stakeholders affected by local planning processes to be directly involved in shaping the future development of their 'neighbourhood'. It helps to ensure that developers and planning authorities base future decisions on an understanding of the Parish and the needs and priorities of the communities that live there, so that development can work positively to support communities, be well integrated into the local social, economic and environmental context, and that it respects and works positively to conserve assets and places of local value.

The Parish Council recognised that neighbourhood planning provides a powerful set of tools that can enable local people to help ensure that development planning is based on 'on the ground' knowledge of the area, that it works positively to meet the long-term development needs and aspirations of communities and local businesses, is sustainable, addresses priority local

development issues and concerns, and is based on an understanding of areas and assets of local significance and value.

The consultation and engagement process has been core to formulation of the Neighbourhood Plan for Perranuthnoe Parish over the last 7 years, it has enabled local people to use their in-depth knowledge of the area to highlight their development aspirations for the Parish, describe development planning issues or challenges of concern to them, identify the elements of the Parish they most value, and how they would like to see the area develop over the short and long-term. This in turn has directly informed the identification of sustainable development planning objectives for the Parish, and development of the policies needed to achieve them.

The consultation process has been varied and broadly publicised, including numerous consultation events, open meetings, questionnaires and surveys, ongoing web based and social media information dissemination and engagement, and through Parish Council monthly meetings and the NP Steering Group. It has also helped to raise public awareness of the opportunity that the NP provides for people to help shape the future of their Parish, and has increased public understanding of, and interest in, national and county development planning processes.

Consultation with, and input by, statutory organisations has also been core to development of the Neighbourhood Plan helping to ensure that the Neighbourhood Plan policies align with national and county strategies and regulations, and that the NP will work to support the broader objectives and approaches adopted by sectoral agencies and organisations. The main stages at which statutory consultees have provided input has been during screening for Strategic Environmental Assessment (SEA) and in the Regulation 14 pre-submission consultation on the draft Neighbourhood Plan. The Environment Department also provided core advice and input for development of the Coastal Change Management Area policy and environmental considerations across policies within the NP, and the Historic Environment Service provided important information to support development of NP heritage policies. Cornwall Council Planning & Sustainable Development Service have provided core advice and support throughout Plan development.

The combination of local and sectoral consultation and input to the Plan has been important for the development of a locally informed Plan that can help to ensure that national and county policies are effectively applied to the local context, and to chart a more informed and positive path for sustainable development at the local level.

The NP consultation process also revealed that there is significant concern amongst local communities about current levels and patterns of development, with a number of individuals also voicing their concerns that decision-making on planning issues currently often does not appear to be based on a clear understanding of the Parish or the needs of its communities, and that the result is patterns and levels of development that are detrimental to the area and the communities that live there. There is disillusionment that local people are powerless to do anything about planning decisions that significantly affect them and their families, and that the information and concerns they raise appear not to be considered. The precedent set by passed planning decisions appears in practice to be a core grounds on which subsequent planning permission is granted for other sites, and there is significant concern that this will lead to ongoing and worsening patterns of development impact on the area and on local people.

The Neighbourhood Planning process has generated a real sense of optimism that perhaps here is a chance to help shape the future of the Parish in a more positive and sustainable way. The consultative process has provided a strong baseline for understanding the attributes of the Parish that are most valued by communities, and public concerns over threats to them. It has helped to highlight ways to address these threats, in order to achieve locally responsive and sustainable development that can achieve positive long-term outcomes for communities and for designated AONB and WHS landscapes. It will hopefully provide important information and local policy guidance for developers and decision-makers, so that decision-making made remotely in Planning Department offices, or by Appeal inspectors from outside the area, can be based on a clear understanding of the Parish and the communities that live there. There is hope that the Neighbourhood Plan will be actively used in planning processes to help achieve more positive and locally responsive development.

## **NEXT STEPS**

Following formal submission of the Neighbourhood Plan by the Parish Council, Cornwall Council will undertake the mandatory Regulation 16 consultation on the draft Plan, prior to submission for independent examination by an external examiner. Depending on the comments received from the examiner there may be a need to make amendments to the Plan. Once the Neighbourhood Plan has been approved by the Examiner, there will then be a referendum on the Plan, where local residents will vote on whether the Plan should be adopted.

**APPENDIX 1:** Feedback received from statutory consultees on Perranuthnoe Parish Council application to designate the Parish a Neighbourhood Area (Application number: PA15/00018/NDP)

**The Highways Agency** who specified that they had no objection in principle to the Parish becoming an NDP area, but that due to the relative proximity of the A30 to the west of the plan area, any policies coming forward have the potential to impact on the strategic road network and they therefore wished to comment further on the plan as it develops to ensure it includes a satisfactory assessment of traffic impacts and mitigation requirements, if appropriate.

**Cornwall Council's Department for Historic Environment Planning (Archaeology)** who asked that the Strategic Historic Environment Service (SHES) be consulted for advice.

**Natural England** who advised that:

'Natural England is a statutory consultee in neighbourhood planning. We must be consulted on draft Neighbourhood Development Plans where the Town/Parish Council or Neighbourhood Forum considers our interests would be affected by the proposals. We must be consulted on draft Neighbourhood Development Orders and Community Right to Build Orders where proposals are likely to affect a Site of Special Scientific Interest or 20 hectares or more of Best and Most Versatile agricultural land. We must also be consulted on Strategic Environmental Assessments, Habitats Regulations Assessment screening and Environmental Impact Assessments, where these are required. Your local planning authority will be able to advise you further on environmental requirements.

The following is offered as general advice which may be of use in the preparation of your plan. Natural England, together with the Environment Agency, English Heritage and Forestry Commission has published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans and development proposals. This is available at: <https://www.gov.uk/consulting-on-neighbourhood-plans-and-development-orders>

Local environmental record centres hold a range of information on the natural environment. A list of local records centre is available at: <http://www.nbn-nfbr.org.uk/nfbr.php>

**Protected landscapes**

If your neighbourhood planning area is within or adjacent to a National Park or Area of Outstanding Natural Beauty (AONB), we advise that you take account of the relevant National Park/AONB Management Plan for the area. For Areas of Outstanding Natural Beauty, you should seek the views of the AONB Partnership.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. Their boundaries follow natural lines in the landscape rather than administrative boundaries, making them a good decision making framework for the natural environment. <http://www.naturalengland.org.uk/publications/nca/default.aspx>

**Protected species**

You should consider whether your plan or proposal has any impacts on protected species. To help you do this, Natural England has produced standing advice to help understand the impact of particular developments on protected or Biodiversity Action Plan species should they be identified as an issue. The standing advice also sets out when, following receipt of survey information, you should undertake further consultation with Natural England.

Natural England Standing Advice

### Local Wildlife Sites

You should consider whether your plan or proposal has any impacts on local wildlife sites, eg Site of Nature Conservation Importance (SNCI) or Local Nature Reserve (LNR) or whether opportunities exist for enhancing such sites. If it appears there could be negative impacts then you should ensure you have sufficient information to fully understand the nature of the impacts of the proposal on the local wildlife site.

### Best Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services (ecosystem services) for society, for example as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution. It is therefore important that the soil resources are protected and used sustainably. Paragraph 112 of the National Planning Policy Framework states that:

*'Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality'.*

General mapped information on soil types is available as 'Soilscapes' on the [www.magic.gov.uk](http://www.magic.gov.uk) and also from the LandIS website; <http://www.landis.org.uk/index.cfm> which contains more information about obtaining soil data.

### Opportunities for enhancing the natural environment

Neighbourhood plans and proposals may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment, use natural resources more sustainably and bring benefits for the local community, for example through green space provision and access to and contact with nature.

Opportunities to incorporate features into new build or retro fitted buildings which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes should also be considered as part of any new development proposal.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again at [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk)

### Parish Response:

The advice and recommendations provided by these statutory consultees has been considered and followed in development of the Neighbourhood Plan for Perranuthnoe Parish and all relevant consultees have been consulted as part of the Strategic Environmental Assessment (SEA) screening process and within Regulation 14 consultation.

### **Annex 2:** Statutory consultees for pre-submission consultation

- Cornwall Council Neighbourhood Planning Team;
- Homes England;
- Regulator of Social Housing;
- Natural England; Environment Agency;
- Historic England;
- Highways Agency;
- all utility companies;
- mobile phone companies;

- Cornwall AONB;
- Cornwall World Heritage Site;
- The National Trust;
- National Farmers Union in the SW;
- Cornwall Wildlife Trust;
- Devon and Cornwall Housing Association;
- Coastline Housing;
- Cornwall Housing; Ocean Housing;
- Cornwall Chamber of Commerce and Industry;
- Cornwall and Isles of Scilly Local Enterprise Partnership;
- Cornwall Buildings Preservation Trust;
- Cornwall Maritime Strategy Group;
- Forestry Commission;
- Duchy of Cornwall; Devon and Cornwall Policy;
- Cornwall Fire, Rescue and Community Safety Service;
- Adjacent Parishes: St Hillary, Marazion, Ludgvan, St Erth, Germoe

Additional local organisations who the Parish felt may be interested in reviewing the NP:

- Cornwall South West Coast Path Association;
- West Cornwall Footpaths Preservation Society;
- Community Land Trust;
- Cornwall Heritage Trust;
- West Cornwall Dark Sky Partnership;
- Cornish Biodiversity Network;
- Farming and Wildlife Advisory Group (FWAG) South West;
- Guild of Cornish Hedgers;
- Cornwall Archaeological Society;
- Cornwall Countryside Access Forum;
- Country Land and Business Association;



## APPENDIX 2

Feedback received from Statutory Consultees for SEA and HRA Screening, detailing how the Parish responded to that feedback in making amendments to the draft Neighbourhood Plan.

| Respondent                                       | Paragraph No / Policy Reference | Comment   | Parish response  |
|--|---------------------------------|---|--|
| Cornwall Council Affordable Housing Team         | Policy HTA3<br>Paragraph 5.3    | <p>Thank you for consulting the Affordable Housing team</p> <p>Paragraph 5.3 and the previous paragraphs outlining housing in the parish are noted and are fair and representational.</p> <p>Policy HTA3 Affordable housing is in conformity with the local plan as the parish recognise exception sites and states that</p> <p>'Placement of affordable housing will be prioritised within defined settlement areas; however, the Parish also recognises the potential need to include exception sites where these relate well to the settlement(s).'</p>  | The Parish appreciates the positive feedback from the Affordable Housing Team, and confirms that it aims through the NP to continue its positive approach to the provision of affordable housing for those most in need in the Parish.   |
| Cornwall Council Environment Service - Landscape |                                 | <p>This NDP has been very carefully thought out to make provision in its policy and guidance for the protection and enhancement of the overall landscape and characteristic features and elements which come together to create local distinctiveness.</p> <p>The Local Landscape Character Assessment clearly informs the whole document and gives a clear steer as to how future development should have a positive impact on the local character and views throughout the plan area.</p> <p>The document clearly relates to the AONB and WHS Management Plans to reinforce the importance and high scenic quality of the landscape of the Plan area.</p> | <p>The Parish appreciates the positive feedback from Cornwall Council Environment Service Landscape Specialist.</p> <p>Local Landscape Character Assessment has provided a key baseline of information and assessment to guide the development of NP policies. Its recommendations help to guide approaches to address many of the key priority issues and concerns raised by local communities.</p> |

|   |  |  |  |
|---|--|--|--|
| Cornwall Council Environment Service - Ecologist                                | All  | I was pleased with the environmental content of this plan and have no additional suggestions for them.   | The Parish appreciates the feedback from the Cornwall Council Environment Service Ecologist  |
| Cornwall Council Environment Department – Flood and Coastal Environment Officer | Background information section to the NP (Section 2) outlining the planning and policy context for coastal management<br><br><br><br><br><br><br><br><br><br>Policy NLB2 | <p><b>Coastal management background</b></p> <p>The planning and policy context is well covered.</p> <p><i>2.36, p20, 2.4.1 and Fig.11</i> – Small correction suggested for consistency:<br/>The second Management Area is MA19 Marazion to Longrock not PDZ8. PDZ8 is the Policy Development Zone and within MA19 the relevant Policy Unit is PU 19.1 (The Greeb to Trenow Cove).</p> <p>The 2016 SMP2 review maintained the “No Active Intervention” policy for all three epochs for the relevant policy units on the parish’s coastline (PU 18.1, 18.4 and 19.1).<br/><a href="https://www.cornwall.gov.uk/environment-and-planning/countryside/estuaries-rivers-and-wetlands/flood-risk/coastal-erosion-and-shoreline-management/shoreline-management-plans/shoreline-management-plan-review-2016/">https://www.cornwall.gov.uk/environment-and-planning/countryside/estuaries-rivers-and-wetlands/flood-risk/coastal-erosion-and-shoreline-management/shoreline-management-plans/shoreline-management-plan-review-2016/</a></p> <p><b>Coastal Change Management Area</b><br/>This is consistent with the NPPF and SMP guidance to identify CCMA’s in places where there are likely to be significant physical changes to coastal areas over the next 100 years.</p> <p>We recommend the use of consistent wording in NDP’s on CCMA’s to avoid any confusion or misinterpretation.</p> <p>i) The wording of this policy needs reviewing. A CCMA is a community affected by significant coastal change (i.e. the relevant stretch of coastline). It’s not the same thing as a Development Exclusion Zone (DEZ), which should be referred to as an “Exclusion Zone”. The Exclusion Zone should be measured from the latest predicted 100 year erosion line, not the</p> | <p>The Parish appreciates the detailed feedback and information provided by the Cornwall Council Environment Department Flood and Coastal Environment Officer. The information, data and advice provided have been extremely helpful in enabling the Parish to better focus the NP Coastal Change Management Area Policy (NLB2), so that it is in line with Cornwall Council’s overall approach to managing coastal change, supports implementation of Cornwall Council’s Climate Change Development Policy Document and Climate Change Action Plan; and that it is based on assessment of all available data and information. It has also enabled the Parish to strengthen the background information section of the NP, and helped ensure that the broader context to coastal change management is clear, and Parish data is accurate.</p> <p>Following the SEA, the NP team worked with the Council’s Flood and Coastal Environment Officer who provided extensive advice and information to support revision of the CCMA policy.</p> <p>She also facilitated communication with the coastal management experts involved in developing the Newquay NP CCMA policy, who also provided helpful advice and information.</p> <p>The Parish can confirm that the NP CCMA policy (NLB2) has been revised following the advice and information provided by the Flood and Coastal Environment Officer; and further detailed</p> |

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|  |  | <p>HTM. A CCMA Exclusion Zone doesn't preclude all types of development. Please refer to the <u>draft</u> Planning for Coastal Change Chief Planning Officer's Guide Note on what is considered to be appropriate development in a CCMA:<br/> <a href="https://www.cornwall.gov.uk/environment-and-planning/planning/planning-policy/adopted-plans/planning-policy-guidance/cornwall-planning-for-coastal-change/">https://www.cornwall.gov.uk/environment-and-planning/planning/planning-policy/adopted-plans/planning-policy-guidance/cornwall-planning-for-coastal-change/</a><br/> Please see policies CC1 and CC2 of the made up Newquay Neighbourhood Development Plan for sample wording.</p> <p>ii) "The siting of campsites or other visually intrusive land uses will not be permitted within the CCMA." The justification for excluding certain types of development in an Exclusion Zone or CEVZ would be stronger if they might exacerbate coastal erosion or inhibit roll back, rather than for visual impact reasons. Please check for consistency with the Planning for Coastal Change guide note – the note says compatible development in Coastal Erosion Vulnerability Zones includes "Temporary or moveable properties such as touring caravans, tents and motor homes used for holiday purposes." Visual impact justifications might fit better elsewhere in the NDP.</p> <p>iv) Designating a "coastal fringe" within 50m of the HTM: Managing land use carefully on a vulnerable coastline is a good idea. The terminology and baseline should be checked for consistency with CCMA and NPPF guidance.</p> <p>v) For consistency with other NDP's, the 50m buffer zone should be referred to as a Coastal Erosion Vulnerability Zone (CEVZ) and should be measured from the landward edge of the Exclusion Zone. Development proposals in this zone must be accompanied by a Coastal Erosion Vulnerability Assessment.</p> <p>Since recreational access to the coast is of such importance to the local community, we recommend adding the following policy:<br/> "In all cases where the SW Coast path passes through the Exclusion Zone, an additional 2m must be added to the Exclusion Zone to ensure that there is sufficient protected land to enable the path to roll back."</p> | <p>information has been added to the coastal management background section.</p> |
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p.66: A map showing the different zones (CCMA, Exclusion Zone, CEVZ) would be useful to understand their extent and the different policies that apply to each (it would need to be clear that these are the zones based on the current erosion line and that they will move inland as the coastline changes and the NCERM erosion line gets updated).

**Justification**

The justification is mainly about visual impact, which is important but would fit better after the primary justification for the CCMA policies which is more about enabling communities and habitats to adapt to physical coastal change (e.g. erosion, sea level rise). Please see the justifications for the CCMA policies in the Newquay NDP for steer. The justification should explain why the 100 year erosion line is being used as a baseline and how the Exclusion Zone and CEVZ have been estimated. The justification for adding a 20m buffer zone to the 100 year erosion line needs further justification. The Newquay NDP added a 10m buffer zone and a 30m Coastal Erosion Vulnerability Zone based on professional advice.

Some of the coastal change related reasons for the policies could include:

- Avoiding squeezing important coastal habitats as the coast erodes and allowing them space to roll back.
- Protecting the area inland of the SW Coast path from development will enable the path to be realigned to adapt to coastal erosion, thus maintaining a coastal pedestrian link for residents and visitors. Active travel helps communities to reduce their climate change impact and supports healthy lifestyles. Protecting paths, roads and any other infrastructure at risk from coastal change will maintain community resilience.
- To ensure new development will be safe through its planned lifetime, without increasing risk to life or property, or requiring new or improved coastal defences.

It should be noted in the worst case scenario below that only part of the parish's coastline would have a 100 year erosion line extending 80m inland. In other areas where the geology makes this coast more resilient, the erosion line is much closer to the cliff edge and thus the

“Exclusion Zone” would be considerably narrower. For this reason designating a blanket 100m Exclusion Zone along the entire coast would be difficult to justify.



**Alignment with broader plans and frameworks**

The policies align with the following outcome in **Cornwall Maritime Strategy 2019-2023**:

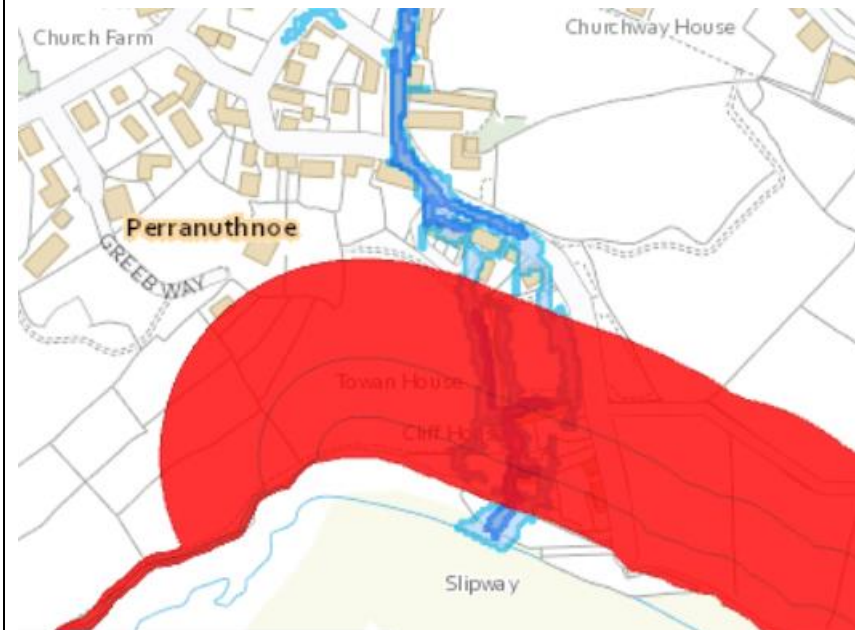
- Target Outcome D: “Cornwall has healthy, safe and vibrant coastal communities that have a strong relationship with the sea and coastal environment.”  
Objective D7: “Use a place-based approach to strengthen the resilience of maritime communities to the social, environmental and economic impacts arising from future events and shocks, including natural hazards, climate change and socio-political change.”

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|  | <p>Policy BDL1<br/>Policy CW5<br/>and NP<br/>background<br/>information to<br/>flooding risks<br/>(NP section<br/>2) which<br/>provides key<br/>background<br/>information</p> | <p>See: <a href="https://www.cornwall.gov.uk/environment-and-planning/maritime-strategy/">https://www.cornwall.gov.uk/environment-and-planning/maritime-strategy/</a></p> <p>The policies align with the following outcomes in Cornwall environmental Growth Strategy:</p> <p>Target Outcome 2: Cornwall is a happy healthy place to be.<br/>h) Resilient communities who respond to, and recover quickly from,<br/>environmental challenges.</p> <p>Target Outcome 9: Nature in Cornwall is abundant, diverse and well connected;<br/>a) Protection and expansion of the existing, high-quality, backbone of Cornwall's designated terrestrial and marine protected areas, landscapes and heritage.<br/>e) Naturalised river systems and coastal processes, with healthy connections between terrestrial and maritime systems.<br/>c) Reduced intervention and management of natural systems in Cornwall<br/>by working with nature.<br/>g) Integrated catchment and coastal management, accounting for landscape scale impacts and opportunities.</p> <p>See: <a href="https://www.cornwall.gov.uk/environment-and-planning/cornwall-and-isles-of-scilly-local-nature-partnership/cornwall-s-environmental-growth-strategy/">https://www.cornwall.gov.uk/environment-and-planning/cornwall-and-isles-of-scilly-local-nature-partnership/cornwall-s-environmental-growth-strategy/</a></p> <p>Please note that a Climate Change Development Policy Document is being developed by Cornwall Council.</p> <p><b>Building Design</b><br/><i>k) Includes good drainage systems to prevent erosion and flooding risk to surrounding areas; Development will not be supported where there are erosion or flooding risks to surrounding properties, farmland, coastal areas, significant natural or heritage landscapes, public spaces, footpaths, bridleways and roads, or to sites of importance for biodiversity;</i></p> | <p>The information provided by the Flood and Coastal Environment Officer in relation to flooding and risk management was very helpful and enabled the Parish to make amendments to the NP policy guidance and to the background and evidence base sections of the Plan.</p> <p>Due to the need for further detail in the policy guidance provided in relation to flooding and</p> |
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|  | <p>for sustainable development planning</p> | <p>I suggest some steer is given on what “good drainage” means. The following policies could be adapted for this parish:</p> <p>“Flood impact assessments should demonstrate how the development will avoid flood risk areas, contribute to shoreline management objectives and remain sustainable in the long term.” (Falmouth NDP)</p> <p>“Sustainable Urban Drainage solutions will be implemented that minimise risk of flooding both on and off site, and which</p> <ul style="list-style-type: none"> <li>(i) have particular regard to the potential for flooding into the surrounding neighbourhoods, properties, habitats, roads, paths, private water supplies and the sea;</li> <li>(ii) ensure that surface water drainage is designed and managed to have no adverse effect on bathing water quality, protected habitats or the Mounts Bay Marine Conservation Zone.</li> <li>(iii) there is sufficient consented sewage treatment capacity to ensure no adverse impact on bathing water quality or protected habitats.</li> <li>(iv) Sustainable Urban Drainage Systems (SUDS) to be open green systems (not storing water in underground tanks which are harder to maintain).”</li> </ul> <p>Green open SUDS reduce maintenance costs and provide biodiversity and public realm/ green corridor enhancements.</p> <p>Please refer to the <i>Neighbourhood Planning Flooding and Drainage Guidance Note</i> for further justification and information at:<br/> <a href="https://www.cornwall.gov.uk/environment-and-planning/planning/neighbourhood-planning/preparing-a-neighbourhood-plan/neighbourhood-planning-guide-notes-and-templates/#-tab-359262">https://www.cornwall.gov.uk/environment-and-planning/planning/neighbourhood-planning/preparing-a-neighbourhood-plan/neighbourhood-planning-guide-notes-and-templates/#-tab-359262</a></p> <p>There are some useful SUDS case studies and further guidance on the following sites:<br/> <a href="https://thefloodhub.co.uk/knowledge-hub/">https://thefloodhub.co.uk/knowledge-hub/</a><br/> <a href="https://www.susdrain.org/case-studies/">https://www.susdrain.org/case-studies/</a></p> | <p>SuDS. A specific policy was developed to address the issues of flooding, erosion and subsidence in the Parish.</p> <p>The background section of the plan includes further information on flooding, erosion and subsidence concerns in the Parish, and further detail has been added to the evidence base and justification section of the NP under policy CW6 to outline the policy and strategic context in line with the advice provided.</p> |
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There are no fluvial flood risk areas identified in the parish. The main flood risk in the parish is from surface water run-off along roads and in the villages where there are low points. Historic flood records for the area include surface water run-off from fields in Perranuthnoe and Goldsithney in 2004. There's an overlap between surface water flood risk and coastal erosion risk in an area between Perranuthnoe village and Perran Sands (see map extract below). This could exacerbate the erosion risk in this area.



See Cornwall Council's [Strategic Flood Risk mapping](#) web page.

Most of the parish is designated as an area affecting bathing waters. Managing surface water run-off from developments and land-use will help to protect bathing waters and marine habitats from pollution.

Policy NLB 5 provides specific guidance in relation to achieving 'Environmental Responsibility

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|  | <p>Policy EB1</p> | <p><u>Building Design</u></p> <p>L) “Wherever possible incorporates environmentally sustainable materials and systems....”</p> <p>This policy could be further strengthened by encouraging application of the energy hierarchy:</p> <p>1<sup>st</sup> - minimise the energy and water needs (e.g. passive solar design, natural light and ventilation, super insulation, triple glazing, thermal mass).</p> <p>2<sup>nd</sup> – use renewable energy sources – e.g. solar, hydro, wind, biomass, geothermal.</p> <p>3<sup>rd</sup> – use low carbon energy sources – e.g. heat pumps (water, ground or air source).</p> <p>4<sup>th</sup> (last resort) – use the most efficient energy sources in conjunction with a green tariff</p> <p>Building Design</p> <p>The NDP could encourage new buildings to be designed to the “Building with Nature” standard:<br/> <a href="https://www.cornwall.gov.uk/environment-and-planning/grow-nature/news/building-with-nature-a-new-development-benchmark/">https://www.cornwall.gov.uk/environment-and-planning/grow-nature/news/building-with-nature-a-new-development-benchmark/</a></p> <p><b>Support Sustainable Local Businesses</b></p> <p>The policy aligns with the following outcome in <b>Cornwall Maritime Strategy 2019-2023</b>:</p> <ul style="list-style-type: none"> <li>• Target Outcome A. Achieve a sustainable future for maritime Cornwall that balances appropriate economic growth, supports resilient communities and protects environmental assets.</li> </ul> <p>See: <a href="https://www.cornwall.gov.uk/environment-and-planning/maritime-strategy/">https://www.cornwall.gov.uk/environment-and-planning/maritime-strategy/</a></p> | <p>in Development’. This policy encourages development proposals to demonstrate environmental responsibility through alignment with recognised environmental standards such as the Building Research Establishment Environmental Assessment Method (BREEAM) or Code for Sustainable Homes. The Parish felt that it was clearer to recommend that developers use official methods / standards than to try to provide specific guidance within the policy. It was felt that BREEAM would be appropriate as it is an internationally recognised method of assessing, rating, and certifying the sustainability of buildings, used in more than 50 countries worldwide.</p> <p>This is useful information to more clearly contextualise Policy EB1 within broader county strategies.</p> |
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| <p>Cornwall Council – Policy Team</p> | <p>NLB 3</p> | <p>I have a few thoughts on draft Policy NLB4. The interest in reducing light pollution is welcomed but I think the wording could be tightened up.</p> <ul style="list-style-type: none"> <li>• The wording at the beginning does not clarify that it is external lighting that is to be specified.</li> <li>• CC’s approach to development at risk of light pollution is to mitigate by condition, not refuse.</li> <li>• I’d recommend that the basis of the dark sky condition in the NP toolkit guidance is used for the criteria (includes brightness and colouration) as this was carefully crafted with the Enforcement Team but I admit I don’t know for sure how this relates to ultra violet lighting (lighting gets very technical) so it could be that a separate threshold would be needed for this. The Street Lighting Team (Mandy Langdon) may be able to advise.</li> </ul> <p>Points of note:</p> <ul style="list-style-type: none"> <li>• if the West Cornwall designation as currently proposed is successful, appropriate new development will be subject to our dark sky condition anyway as the parish is in the buffer zone but an NDP policy would help double down on this approach. In planning terms we treat the buffer zone the same as the core area.</li> <li>• street lighting which is adopted by CC has to reach CC standards, with downward shielding, suitable colouration and a dimming relation appropriate to the setting.</li> </ul> | <p>The Parish appreciates the feedback and advice from the Cornwall Council Policy Team and the guidance provided for tightening up the wording on light pollution.</p> <p>Light pollution emerged as a key issue of concern from consultation, in particular in AONB coastal areas of the Parish relative to light spill from use of extensive glass walls in large modern buildings. In relation to this, glare from sunlight on glass is also an issue of concern. Concerns relate to both the impacts on the natural beauty of night skies and coastal landscapes; and to impacts on wildlife, in particular birds and bats.</p> <p>NP policy NLB 4 guidance does not therefore relate solely to external lighting. This has been clarified within the wording under policies point 1 and 2.</p> <p>NLB 4 policy provisions follow the National Planning Policy Guidance on Light Pollution and the national Neighbourhood Planning Guidance linked to these guidelines. This recommends that parishes wishing to manage light pollution should consider the imposition of design conditions within policies in order to manage key factors such as:</p> <p>External Lighting</p> <ul style="list-style-type: none"> <li>(i) The number, design, specification and position of lamps;</li> <li>(ii) Full shielding (at the horizontal and above) of any lighting fixture exceeding 500 initial lumens and evidence of limited impact of unshielded lighting through use of adaptive controls;</li> <li>(iii) Limiting the correlated colour temperature of lamps to 3000 Kelvins or less.</li> </ul> |

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|  |  |  | <p>Internal Lighting</p> <ul style="list-style-type: none"><li>(i) avoiding or recessing large areas of horizontal or vertical fenestration;</li><li>(ii) avoiding glazing which is facing upwards (whether horizontal or angled) including conservatory roofs; and</li><li>(iii) within a site, locating and orientating development as sensitively as possible.</li></ul> <p>The national guidelines also highlight that neighbourhood plans can include measures to reduce the impact of internal lighting spilling externally stating that: 'Traditionally, this has been given limited consideration but there has been an appeal case in West Sussex which recognised the impact of light spill from a small domestic property with relatively large amounts of glazing on the character and tranquillity of the neighbouring South Downs National Park.' The guidelines suggest that a conditions-based approach to control of light pollution risk within development planning will be most effective where use of conditions is restricted to sensitive areas such as Areas of Outstanding Natural Beauty, and environmentally sensitive areas or heritage conservation areas.</p> <p>NP Policy NLB3 under Point 2 follows the above guidelines establishing two sets of local planning standards for 'external lighting'; and for 'glare and light spill from fenestration' and encouraging the use of dark sky conditions within planning approvals.</p> <p>The above standards are also in line with Cornwall Council's 'Neighbourhood Planning and the Dark Night Sky' guidelines and the 'dark sky condition' in the NP toolkit guidance.</p> |
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|                                    |  |   | <p><u>To Note:</u> Prior to formal submission of the NP in December 2021, the West Penwith Dark Skies Reserve was established.</p> <p>It is very positive to have the confirmation by Cornwall Council Policy Team advisor in this SEA feedback that that Perranuthnoe Parish lies in the buffer zone to the West Cornwall Dark Skies Designated area and that in planning terms the buffer zone is treated the same as the core area. The use of conditions within planning approval will therefore be supported.</p> <p>In drafting this NP policy, the Parish understood that in it cannot require conditions to be used because the final decision lies with CC planning service. That is why the policy wording uses the term 'encourage'.</p> <p>Update: In December 2021 the west Cornwall Dark Skies designation was approved and it is very good news for the Parish that following the designation, the use of dark sky conditions is now endorsed by Cornwall Council.</p> |
| Cornwall Council CIL Charging Team |  | <p>General</p> <p>The Parish of Perranuthnoe is within CIL Charging zone 4, and as a designated rural parish, new developments of 1-5 dwellings will be liable to pay £100 per sqm, and developments of 6 or more will be liable to pay £35 per sqm. However, affordable housing and self-build developments are able to claim exemption from liability to pay a CIL charge. Open Market dwellings on Rural Exception Sites are also exempt from CIL.</p> <p>CIL came into effect in Cornwall on 1 January 2019. From this date, developments creating one or more dwellings, or new floorspace of 100sqm or more, could be charged CIL. However, CIL will only become payable on commencement of a development (not granting of planning permission), which means there is always likely to be delay</p> | <p>The Parish appreciates the feedback from the Cornwall Council CIL Charging Team and information provided on CIL charging.</p> <p>The Parish understands the position relative to affordable housing, rural exception sites and areas with Principle Residency conditions. The Parish has made the judgement however that the NP provisions prioritising housing for local people through its 'principle residency' and 'affordable housing' policies is more valuable to Parish communities than the 15% CIL share.</p>  |

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|  |  | <p>between a development being granted permission and when it has to make a CIL payment.</p> <p>Of the CIL income received, 5% can be retained by the Charging Authority (Cornwall Council) for administering the process, 15% (25% for a parish with a made NDP) is paid directly back to the Town or Parish Council (the 'Neighbourhood Portion') in which development takes place (the 'Neighbourhood Portion'), and the remaining 70-80% (the 'Strategic Share') must be spent on infrastructure to support the development of the area. The CIL Strategic Share in Cornwall is going to be made available to communities, organisations, and other Council services, via a bidding process.</p> <p>A funding process and application criteria for this are now being developed. It is unlikely that a funding round will be held until mid-2020 at the earliest.</p> <p>More information on CIL can be found on the Councils website at <a href="http://www.cornwall.gov.uk/cil">www.cornwall.gov.uk/cil</a>. Any specific queries can be sent to <a href="mailto:cil@cornwall.gov.uk">cil@cornwall.gov.uk</a>.</p> <p>Policy CW4: Principle Residency. Having an adopted Principle Residence Policy will mean the CIL rate charged on residential development will move down to the next charging zone. Therefore if the policy is adopted, residential development in Perranuthnoe would be charged zone 5 rates, i.e., £0 per sqm.</p> <p>As Zone 5 residential developments have no CIL charge and will, therefore, not receive any 'Neighbourhood Portion' CIL income from development in their area, Cornwall Council has made the decision to pay parishes in Zone 5, where development has commenced, a Neighbourhood Portion from the remaining 'Strategic Share'. The amount paid will be equivalent to the development being charged at the appropriate Zone 4 rate. These payments will be made to the Zone 5 parishes at the same time as the Neighbourhood Portion is paid to the other Town and Parish Councils, i.e., April and October each year.</p> |  |
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| <p>Natural England</p> | <p>Policy HTA1<br/>Policy NLB2</p> | <p><b>Perranuthnoe Neighbourhood Plan SEA/HRA Screening Report</b><br/>Thank you for your consultation on the above dated 22nd October 2019 which was received by Natural England on the same day.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p><b>Strategic Environmental Assessment Screening</b><br/>We note that the proposed development boundary for Perranuthnoe includes a large plot to the southern edge of the settlement. We have been unable to find the landscape evidence to support the inclusion of this large plot within the development boundary. It is located within the AONB and new and additional development within the plot is likely to be visually prominent. We therefore advise that landscape evidence is gathered, based on which a SEA re-screening on landscape issues should then be undertaken.</p> <p>In addition to this, we query how new development within this location can be squared with the policy of the Shoreline Management Plan, which states for section 18.4 of the SMP that 'a rollback strategy would need to be used to manage the coastal change to the affected properties'. Future defences to defend new development in this location would conflict with SMP policy and may have significant environmental impacts.</p> <p><b>Habitats Regulations Assessment Screening</b><br/>Natural England welcomes the consideration given to the Habitats Regulations. We agree with the conclusion of the report that there are no likely significant effects on European sites, and therefore advise that further Habitats Regulations Assessment is not required.</p> <p>We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.</p> <p>Yours Sincerely</p> | <p>The Parish appreciates the feedback from Natural England, and recognises the importance of their guidance as the advisory body responsible for AONB in England.</p> <p>The Parish have reviewed NE's comments in relation to the area of land in question on the southern edge of Perranuthnoe settlement boundary. The Parish agree that it is entirely inappropriate for this area of land to be included within the boundary, due to the reasons NE highlight:</p> <ul style="list-style-type: none"> <li>- It is in a visually prominent site within the AONB, adjacent to the south-west coast footpath; any development of this land would run counter to the objectives of the AONB and to AONB Management Plan policies.</li> <li>- Inclusion of the land within the development boundary would run counter to the Cornwall and Isles of Scilly Shoreline Management Plan (SMP) section 18.4.</li> </ul> <p>The inclusion of this area of land was an error that was overlooked due to the fact that it is part of a garden and on steeply sloping land. However, it is clear that any development on the land in question would not only run counter to AONB and SMP policies, it would also run counter to NP policies under Objective 4, and to the criteria established by the Parish for delineation of Development Boundaries.</p> <p>In light of the above, the Parish agree that it is inappropriate to include the area of garden land within Perranuthnoe Development Boundary, and</p> |
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|                             |  | <p>Corine Dyke<br/>Lead Adviser<br/>Sustainable Development Team – Devon, Cornwall &amp; Isles of Scilly</p>  | <p>confirm that it has been removed, and the Boundary has been revised accordingly.</p> <p>The Parish also wish to emphasise that they recognise that the Development Boundaries proposed in the NP should be used within the context of the broader planning framework and provisions for the conservation of natural landscape character and scenic beauty inherent in AONB designation. There is no intention for the Development Boundaries proposed in the NP to over-ride the protection afforded to AONB landscapes.</p>                                       |
| National Environment Agency |  | <p>Thank you for your consultation of 22<sup>nd</sup> October 2019 providing us with the opportunity to comment in respect of the Perranuthnoe Neighbourhood Plan SEA/HRA screening opinion.</p> <p>In general we consider that it is unlikely that neighbourhood plans will result in any significant environmental effects unless the plan allocates or encourages development over that set out in the Local Plan. Otherwise we consider that any potential for environmental effects from growth in the parish should already have been addressed through the Sustainability Appraisal (SA) which supported the adopted Local Plan.</p> | <p>The Parish appreciates the feedback from the National Environment Agency.</p>  |
| Historic England            |  | <p>This is our first involvement with the preparation of the Plan since the area was designated in 2015.</p> <p>Our focus of attention was SEA Screening is sites allocating development and there are none included in the draft Plan made available. I can therefore confirm that there are no issues associated with the draft Plan that generate concerns or upon which we feel the need to comment.</p> <p>On that basis I can also confirm that we have no objection to any conclusion that a full SEA is not required.</p>   | <p>The Parish appreciates the feedback from Historic England and confirms that there are no specific sites allocated for development outside the main settlement areas of Perranuthnoe, Goldsithney, Rosudgeon and Perran Downs.</p> <p>The only issue of concern may be relative to development impact within the Conservation Areas of Perranuthnoe and Goldsithney villages, given that these are included within proposed NP Development Boundaries. However, the NP places a strong emphasis on conservation of the local heritage character of WHS and AONB</p> |

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|  |  |  | <p>landscapes, historic settlement areas, hamlets and heritage assets within the NP. As part of this, the importance of these Conservation Areas is clearly stated within policies HCA1 and 2, which also recognise the value of non-designated heritage assets.</p> <p>It is hoped that policy provisions in the NP (including all policies under Objective 5 and within BDL1) will provide grounds for improved recognition and consideration of the heritage value of historic areas and assets in the Parish and for their conservation. The NP recognises the significant local value of these areas, and it was clear from public consultation results that improved recognition and protection of, the Parish's heritage assets, is currently one of the priority development planning issues of concern.</p> |
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## APPENDIX 3

### Feedback received from the LPA on the draft Neighbourhood Plan at the time of SEA and HRA Screening

A the time of SEA / HRA screening in 2019, and following the feedback received from SEA consultees, a meeting was held with senior members of Cornwall Council's Planning and Sustainable Development Team, to discuss the draft Neighbourhood Plan.

| Respondent                               | Policy Reference | Comment   | Parish Response   |
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| Planning and Sustainable Department Team |                  | Following on from the meeting last week the area planning team, in addition to the discussion we had around the table, would like to make the following comments on the draft policies (there might be repeats to what was discussed at the meeting): | The NP was amended following the advice and information shared by the Planning Department at the meeting.   |
|  | Policy CW1       | Policy CW1 – Delete first sentence and last 2 sentences, as these are not necessary   | Both sentences were deleted   |
|  | Policy CW3       | Policy CW3 – Delete para commencing, 'Landscape and Visual Impact Assessment' and the following para, 'Where the area's significance..'. The LVIA is not a reasonable 'ask' and the next paragraph doesn't represent policy                           | The reference to LVIA as a requirement was removed from the policy  |
|  | Policy CW5       | Policy CW5 – assessment of any potential increase in traffic flow is not reasonable and we only request traffic modelling for large, major development, please delete   | The reference to traffic flow was removed. The policy now refers only to consideration of development impacts relative to ' <i>parking, access and congestion</i> ' in particular relative to ' <i>the ease of access by service and emergency vehicles, by people to their homes, the delivery of goods, or the safe use of access routes by pedestrians, cyclists and vehicles</i> '. This is focussed on the villages of Goldsithney and Perranuthnoe where current issues and impacts on local communities are particularly acute.<br><br>In relation to this, the issue of the impact of parking on public roads and footpaths, and speeding on communities safety and livelihoods has been raised repeatedly across NP consultations. The justification |

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|  |             |   | and evidence base section accompanying the policy outlines how this policy responds to concerns raised in consultation, and provides further detail on policy / regulatory alignment.   |
|  | Policy HTA2 | Policy HTA2 – comments made in meeting  | <p>The comments made in the meeting related to:</p> <ul style="list-style-type: none"> <li>- The need to make policy provisions more specific, and the recommendation that use of policy criteria can be useful to achieve this;</li> <li>- Avoid genic wording within policies such as 'suitably constructed' and provide greater clarity.</li> </ul> <p>In response to these recommendations, the policy wording for HTA2 was tightened and criteria used to provide clearer and more specific local policy provisions relating to replacement buildings and conversions. In particular to address the key issues of concern and recommendations raised in public consultations, the LLCA, and in the AONB Management Plan. The policy aligns with the provisions in CLP Policy 7. The justification and evidence base section accompanying the policy provides further detail on policy / regulatory alignment and how policy HTA2 responds to issues raised in consultation, the LLCA, by the AONB and in the AONB Management Plan.</p> |
|  | Policy HTA4 | Policy HTA4 – Policy should begin, 'Proposals to replace residential caravans...' Mark feels that the points a, b ..... are unnecessary as we would not consider caravans outside settlement areas anyway and the paragraph, 'Within plots of land where permission...' is covered by the GPDO so should be deleted | <p>The policy was amended. The first two sentences were removed, and the starting sentence now reads '<i>Proposals to replace caravans, mobile homes or other forms of temporary accommodation with permanent dwellings will not be supported</i>'...: '<i>The placement and use of caravans or other forms of moveable accommodation on land in this Parish will not have any bearing on the granting of future planning permission on that land.</i>'</p>   |

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|  |  |  | <p>The Parish felt that the policy intent was clearer with this amended wording. In reviewing other Neighbourhood Plans, the Parish followed the example of Newquay Neighbourhood Plan which uses similar wording.</p> <p>The policy does still contain wording which the Planning Department may consider is covered by the Town and Country Planning Order (2015), the GPDO and the Caravan Sites and Control of Development Act. However, the Parish feel that it is important to ensure that these provisions are applied to the local Parish Context. There is felt to be a need for clear local planning policy guidance on this issue.</p> <p>The justification section of the policy provides more detailed information on the regulatory and strategic context which the Parish felt was important as the target audience for this policy may not be fully versed in the provisions in the Order and Act. Certainly experience to date in the Parish would indicate that this is the case.</p> <p>The increasing extent to which private caravans are being placed for extended periods of time on farmland in the open countryside within AONB and WHS landscapes in the Parish, when their use is not associated with agriculture, the lack of enforcement, and the apparent lack of clear local planning guidance on the issue, was a recurring issue of concern in NP consultations.</p> <p>The policy aims to apply national rules and regs to the local Parish context, and by providing local policy guidance in policy HTA4, it is hoped that this will encourage private caravan owners to follow national rules and regulations and will help to save Cornwall Council time and resources in following up on enforcement requests for inappropriate long-term use of caravans on agricultural land, in open countryside.</p> |
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|  |                   |   | <p>The 'Justification and Evidence Base section accompanying the policy provides further detail on the reasoning for the policy and alignment with national rules and regulations.</p>   |
|  | <p>Policy BD1</p> | <p>Policy BD1: Building Design – please refine!</p> | <p>This policy was re-written and refined to focus on 9 specific design criteria. The criteria have been drawn up based on the key design issues and recommendations coming from public consultations and the LLCA, the advice and guidance provided by statutory consultees, and following guidance on 'the characteristics of well-designed places' outlined in the National Design Guide, the provisions in the NPPF, information in the Cornwall Design Guide and the Chief Planning Officer's Advice Note. The evidence base and justification section accompanying the policy provides further information.</p> <p>Policy BDL1 aims to provide clear local design guidance in order to achieve development that contributes positively to the distinctive local character of AONB and WHS landscapes and settlements in the Parish, and helps to maintain local 'sense of place'. It responds to concerns raised throughout NP consultations on the escalating impact which insensitive building design is having on designated and locally valued landscapes and settlements across the Parish. It aims to support achievement of the Cornwall Local Plan (CLP) Policy 12 requirement that: 'development must ensure Cornwall's enduring distinctiveness and maintain and enhance its distinctive natural and historic character'.</p> <p>Public consultation repeatedly highlighted significant concern over the extent to which building design is eroding the distinctiveness and natural and historic character of landscapes and settlement areas in the Parish. Concerns were raised in particular relative to the scale and visually intrusive impact of modern building design in visually prominent locations in AONB landscapes and on heritage areas of local value. The impact of incongruous and visually intrusive building</p> |

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|  |  |  | <p>design on AONB landscapes is a concern also cited within the LLCA, and raised in the Cornwall AONB Management Plan, which specifically lists Perranuthnoe Parish as an area where the AONB has been negatively impacted by visually intrusive building design.</p> <p>The results of public consultation for the NP also highlight public concern over the escalating impact of visually intrusive building design, with each planning application that is approved seeming to set a precedent for the next. There was a recommendation on the need for the NP to establish clear local guidance and criteria.</p> <p>As outlined in national NP guidance, the neighbourhood planning process is an important forum through which to ensure that communities are effectively engaged in providing locally informed design guidance, in order to help achieve 'well designed places'. Local communities understand and have an intricate knowledge of what constitutes valued 'local sense of place', what the 'distinctive natural and historic character' of the area in which they live is, why it is valued, and they can provide guidance on planning considerations which will help to ensure that buildings are designed to be well integrated within local landscapes and settlements.</p> <p>The criteria established in Policy BDL1 aim to provide that clear local design guidance, to enable developers and decision-makers to understand what 'local distinctiveness' is in the Parish, what is valued and how generic terms used in county planning policy such as 'maintain enduring local distinctiveness' 'enhance', 'innovative' should be interpreted. It is hoped that this will help to remove some of the subjectivity involved in decision-making and interpretation of such terms, and will set a locally informed standard that will help to reduce the extent to which precedents set by previous planning decisions are used as the basis for future decisions.</p> |
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|  | Policy NLB1  | Policy NLB1 – Look at policy 23 of the CLP and refine the policy wording                              | <p>The policy wording was refined and aligns with CLP Policy 23. The evidence base and justification section accompanying the policy outlines the alignment with national / county planning policies and regulations, and how the policy builds on the results of consultation, the LLCA and local baseline data. The policy wording draws on the guidance provided by the Environment Service, AONB and other relevant stakeholder organisations.</p> <p>Note: The feedback received from the Environment Department, AONB, Wildlife Trust and Cornwall Biodiversity Network in the Reg 14 consultation process confirm that this policy now provides appropriate policy guidance.</p> |
|  | Policy NLB 2 | Policy NLB 2 – Please work with Dionne to agree wording which is in accordance with the CCMA approach | <p>The policy was revised after substantial and valuable input and advice from Dionne, the Cornwall Council Environment Department Flood and Coastal Environment Officer. Details are provided above relative to her SEA comments.</p> <p>Additional Note: The policy wording aligns with the Climate Emergency DPD CCMA Policy (CC1) and Mr Lacey (DPD Planning Policy Group Leader) has confirmed to the Parish that the DPD team will put Perranuthnoe forward as one of the Candidate CCMA areas for inclusion in the DPP.</p>  |
|  | Policy NLB 4 | Policy NLB 4 – see Emily Ruben’s comments and refine  | <p>The policy was revised based on the comments and recommendations made by Emily Ruben, Cornwall Council Policy advisor. Details are provided above relative to her SEA comments.</p>  |
|  | Policy NLB 5 | Policy NLB 5 – remove wording which isn’t policy. It is unreasonable to ask for Cornish hedges        | <p>It is not entirely clear what is meant by the statement ‘It is unreasonable to ask for Cornish hedges’?</p> <p>The policy has been revised to ensure that the wording clearly aligns with national / county policy, and with material planning considerations relating to hedgerows and Cornish Hedges.</p>  |

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|  |            |   | <p>The NP policy wording emphasises alignment with material planning considerations in Cornwall’s Planning for Biodiversity Guide, in particular the requirement that: <i>‘due to the high biodiversity value of hedges, and the key role they play in our landscape and sense of place in Cornwall, there is a strong presumption in favour of the retaining of all hedges within developments. It is essential that hedges are assessed as both a landscape and biodiversity feature, as part of any development proposal’.</i></p> <p>The need for local planning policy guidance to support the conservation of Cornish Hedges was an issue raised repeatedly in NDP consultations, by local communities and also highlighted by Parish Council in their NP Position Statement.</p> <p>Relevant planning considerations include the role of hedges and hedgerows as part of the Parish’s Green Infrastructure; their importance for ecosystem connectivity and for achieving biodiversity net gain; and core relevance to AONB / WHS landscape character. The policy Justification and Evidence Base section includes further information on the planning policy grounds for conservation of Cornish Hedges and hedgerows, and further explanation of concerns raised in NP consultation.</p> <p>Please note in the final NP document this has been renumbered Policy NLB4.</p> |
|  | Policy EB2 | Policy EB2 – remove – as discussed in meeting | <p>Agriculture is the main land use in the Parish. The NP consultation process highlighted the value and importance of agricultural land and farming to the social and economic fabric of the Parish and to local landscape character. Recommendations from consultation emphasised that it is important for the NP to provide planning guidance to ensure that</p>   |

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|  |  |  | <p>development works positively to support the long-term sustainability of agricultural production, and the conservation of agricultural landscapes.</p> <p>The LLCA demonstrated the high quality of agricultural land in the Parish, the large majority of which is Grade 2 and 3, and that agricultural landscapes are core to landscape character across the Parish. The LLCA highlights that the small-scale, irregular patchwork of agricultural field systems are an important part of valued landscape character across both the AONB and WHS areas of this Parish and are part of the defining character of local landscapes.</p> <p>The Steering Group members did not understand from the meeting with the Planning Team's that their advice was to completely delete this policy, but rather that it should be revised to ensure that it aligns with CLP and national policy provisions. If the Parish were to completely delete this policy it would run counter to the results of consultation, the findings of the LLCA and to the research that has been undertaken into priority local development planning policy issues.</p> <p>In relation to the broader policy and strategic context:</p> <p>National Guidelines on Assessing Development Proposals on Agricultural Land underline that UK government policies and legislation 'aim to protect the best and most versatile (BMV) agricultural land and soils in England from significant, inappropriate or unsustainable development proposals'</p> <p>Cornwall Local Plan (CLP) Policy 21 aims to achieve 'The Best Use of Land and Existing Buildings'. Under this Policy point d requires planners to 'take into account the economic and other benefits (including food production) of Grade 1, 2 and 3a agricultural land.' It</p> |
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|  |  |  | <p>recommends that 'poor quality land should be used in preference to that of higher quality.'</p> <p>The World Heritage Site (WHS) Management Plan describes the outstanding universal value (OUV) of this area as comprising the 'patchwork of small holdings and farms associated with the great mining estates, where the mineworkers cottages are dispersed in a landscape of small fields and small groups of miners' cottages are set within early nineteenth century miners' smallholdings.'</p> <p>The Cornwall AONB Management Plan highlights the importance of agricultural land to the landscape character of the AONB, and refers specifically to 'the rich soils around Marazion and Perranuthnoe, which support a wide range of arable crops', giving recognition to the value of this area for agricultural production.</p> <p>In recognition of all of the above the Parish made the decision that this policy should not be deleted but should be re-written. The intent of Policy EB2 is now as follows:</p> <p><i>To support resilient farms, and ensure that sustainable development planning recognises the importance of farming to local livelihoods, and the significance of small-field agricultural systems to local landscape character in both the AONB and WHS. This policy aims to ensure that the best and most versatile farmland is conserved for agricultural production. It supports the efficient operation of farms, providing guidance to help ensure that development planning considers the impact of levels and patterns of non-agricultural development on farms. It also recognises the impact which agricultural development can have on designated AONB and WHS landscapes and provides local planning provisions to help ensure that agricultural buildings are well integrated into AONB and WHS landscapes.'</i></p> <p>The policy is divided into two sections</p> |
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|  |            |   | <ul style="list-style-type: none"> <li>- Agricultural Land, Buildings and Sustainable Production and</li> <li>- Agricultural Occupancy Conditions</li> </ul> <p>The justification and evidence section accompanying the policy outlines how it builds on the results of NP consultation and research and aligns with county / national planning policies and regulations. The policy focuses on priority planning issues and concerns in the Parish, and aims to provide local planning policy guidance to support effective application of broader county / national planning policies to the local context in the Parish.</p>  |
|  | Policy EB3 | <p>Policy EB3 – please review and refine and refer to Gwinear-Gwithian policy on caravans and holiday parks:-</p> <p><b>GGP POLICY 10 – PEOPLE AND HOUSING – NEW &amp; EXISTING HOLIDAY ACCOMMODATION</b></p> <p>10.1 Proposals for new holiday accommodation should demonstrate that there is a need for the provision of additional tourist accommodation that cannot be met by existing facilities. Such development should prioritise the conversion or replacement of existing buildings, be well related to an existing settlement in the parish and accessible by a range of transport modes.</p> <p>10.2 Outside the settlement boundaries proposals for the conversion of tourist accommodation to permanent residential use will only be permitted exceptionally where it can be shown that all of the following criteria can be met:<br/> (a) The building is of a construction and size that would be suitable for occupation as a permanent residence without the need for significant extension or rebuilding; (b) Proposals for the loss or conversion of tourist accommodation for residential use will only be supported where the proposal can demonstrate that there is no longer a need for the tourist use and this can be demonstrated through active marketing of the facility for tourist use for a</p> | <p>Policy EB3 was completely re-written. The Justification and Evidence Base section outlines alignment with relevant county and national planning policies and regulations, and how the policy builds on the results of consultation and the LLCA.</p> <p>It should also be noted here that one of the recommendations from the meeting with the Planning Team was that it would be appropriate for the policy to require assessment of 'need' in relation to existing campsites and visitor numbers. Also that it would be appropriate for development proposals to assess impacts on designated WHS and AONB landscape character, both relative to proposed sites and distribution of sites across the Parish; and impacts on adjacent communities, local businesses and the environment.</p> <p>The policy has been developed based on the guidance received and on the results of broader consultation and the LLCA.</p> <p>The Steering Group reviewed the Gwinear-Gwithian NDP policy, and also referred to NP policies in other parishes relating to caravans and holiday parks.</p> |

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|  |  | <p>period of not less than 12 months (c) The approach roads are capable of accommodating the volume of traffic likely to be generated by the development and a safe access can be provided; (d) The services/utilities required for permanent residential use exist or can be provided;</p> | <p>The Gwinear-Gwithian Neighbourhood Development Plan has very different objectives in relation to holiday accommodation, caravans and caravan parks. The parish also has a very different development and social-economic context in the coastal zone. The Gwithian Towans area is described in the NDP as a 'holiday site' and the majority of the buildings / facilities in the area are for holiday accommodation (holiday homes and a large caravan / holiday park). The development priority for Gwithian Towans is the provision / expansion of holiday accommodation to support the tourism economy. The Gwithian NDP refers to concerns over 'an increase of holiday accommodation being changed to full residential occupancy' (Gwinear-Gwithian NDP page 17).</p> <p>The situation is very different in Perranuthnoe Parish where the coastal zone of the Parish is home to a vibrant Parish community, much of the coastal land is farmland, and where concerns arising from the NP consultation process are the opposite to those cited in the Gwinear-Gwithian NDP. In Perranuthnoe the core concerns relate to</p> <ul style="list-style-type: none"> <li>- loss of homes / residences for local people, given the increasing numbers of holiday homes;</li> <li>- the negative impact which further growth of campsites and caravan parks would have on AONB / WHS Parish landscapes and local communities.</li> </ul> <p>The parish of Gwinear-Gwithian relies heavily on tourism, with the beachfront and housing in the coastal area essentially a tourist resort / site. The parish of Perranuthnoe has a much more diverse socio-economic base, and much more diverse land use. Perranuthnoe Parish NP aims to support this diversity, and to encourage patterns of development which maintain vibrant communities, support farming and a diverse economic base, and conserve the distinctive character</p> |
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|  |  |  | <p>of AONB / WHS countryside landscapes, in order to support sustainable development.</p> <p>Due to the different objectives of the Gwinear-Gwithian and Perranuthnoe NDPs in relation to campsites, holiday parks and accommodation; the different socio-economic and landscape context; and the different development planning priorities and challenges, it was not felt to be entirely appropriate to use the Gwinear-Gwithian policy as a template for Perranuthnoe Parish. To do so would have run counter to the results and recommendations of the consultative process, the LLCA, and to the Perranuthnoe NP objectives.</p> <p>This NP policy has therefore been reviewed and rewritten to focus on priority development issues and objectives for Perranuthnoe Parish. The policy intent is <i>'To ensure that levels and patterns of development associated with the establishment or expansion of campsites, caravan parks or other similar holiday accommodation facilities in the Parish responds to local need, is based on informed assessment of social, economic and environmental impacts and is well integrated into AONB and WHS landscapes.'</i></p> |
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APPENDIX 4

Regulation 14 pre-submission Consultation: Statutory Consultees Feedback on Perranuthnoe Parish Neighbourhood Plan

| Respondent                              | Paragraph No / Policy Reference                      | Comment  | Parish Response  |
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| Cornwall Council Environment Department | General<br>CW2<br>CW3<br>CW6<br>HTA1<br>NLB1<br>NLB2 | <p>This is a really well researched, thorough and forward-looking Neighbourhood Plan, with some good practice environmental and climate change resilience policies. The local policy situation regarding CCMA's has changed since the publication of the draft Cornwall Climate Change DPD and I would advise that policy NLB2 is checked for consistency with the draft DPD.</p> <p><b>Policy CW2 Safeguard PROW</b></p> <p>I support this policy. The justifications are sound, this is clearly a really important issue for the parish. I'm pleased to see consideration given to making space to roll-back coastal paths to enable adaptation to coastal change. Some additional justifications relating to strategic fit are suggested below.</p> <p>This policy is aligned to the following Target Outcomes in <a href="#">Cornwall Environmental Growth Strategy</a>:<br/>                     TO1 – "People are connected with Cornwall's nature and culture,"<br/>                     1a) - <i>Urban and rural landscapes that are designed to support local access for communities to enjoy and experience nature.</i></p> <p>TO2 – "Cornwall is a happy healthy place to be,"<br/>                     2c) <i>Communities where homes and healthy workplaces are connected by green infrastructure to support healthy, active lives and transportation.</i><br/>                     2e) <i>Opportunity, ability, and access to outdoor spaces for education, exercise and recreation.</i></p> <p>Enhancing paths and access to nature also fits with the overall principle of environmental growth (going beyond protection of existing access to increasing and improving it).</p> | <p>The changes recommended by Cornwall Council Environment Department are again very helpful in adding further strategic context and clarity, and have been incorporated into the NDP.</p> <p>It should be noted that in the final NP, the policy guidance on Flooding, Erosion and Subsidence has been re-numbered policy area CW6.</p> |



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|  |  | <p>This policy is aligned to the following Target Outcomes in Cornwall Maritime strategy:</p> <p>Target Outcome D: “Cornwall has happy, safe and vibrant coastal communities that have a strong relationship with the sea and coastal environment”.</p> <p>Objective D3) <i>Promote coastal access to beach and water for visitors and residents of all ages, abilities and socio-economic backgrounds,</i></p> <p>Objective D4) <i>promote coastal walking and cycling as a means of healthy and enjoyable transport.</i></p> <p>Target Outcome F: “Cornwall’s coastal communities are better connected through sustainable low carbon transport.”</p> <p>Objective F2) <i>Seek solutions to better connect people with waterfront land, beaches, the sea and estuaries and their associated activities,</i></p> <p>Objective F3) <i>Seek to ensure that coastal communities are better connected with each other and with employment centres, particularly by walking, cycling and public transport routes,</i></p> <p>Objective F6) <i>Deliver measures to enhance, promote and support the sustainable use of the south-west coast path, adjacent land, coastal public open spaces and beaches, for example by improving public transport connections and preparing for sea-level rise and increased risk of coastal erosion.</i></p> <p>As adopted strategies both these documents are Material Considerations for Planning.</p> <p><b>Policy CW3 Local Green Space</b></p> <p>I support this policy, it has a good strategic fit with Cornwall Environmental Growth Strategy and Cornwall Maritime Strategy (see comments above). I like that an ecosystem services approach is encouraged.</p> <p>The justification under Cornwall Climate Change Action Plan could add that the proximity of Local Green Spaces to communities will help to reduce the need for people to drive to places for recreation. The Covid-19 lockdown period earlier in 2020 highlighted the importance of having accessible green spaces that people can walk to from their homes. For people who can’t drive this is essential for enabling regular access to nature and outdoor exercise.</p> <p><b>POLICY CW5 Spatial Planning and Cumulative Impact</b></p> |  |
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**CW5 b) Flooding, Erosion and Subsidence**

I support this policy which will help to reduce run-off and mitigate flooding and water quality risks. The NDP could encourage Sustainable Drainage Systems (SUDS) to be open green systems (not storing water in underground tanks which are harder to maintain). Green SUDS reduce maintenance costs and provide additional biodiversity and public realm/ green corridor enhancements. Aim for SUDS and landscaping to be multifunctional – providing habitat and public access to nature as well as water management. The policy should encourage developers to consider the siting and layout of SuDS at concept stage to avoid them being retrofitted as an afterthought into the least appropriate locations. The Environment Agency’s surface water flood risk maps provide a useful tool for siting and designing SuDS features to respond to the natural water flows in an area. Designing to the natural topography of a site rather than levelling it is also desirable from a drainage and local character perspective.

This policy has a strategic fit with:

Action C2. In the draft refreshed [Cornwall Local Flood Risk Management Strategy](#): *“Incorporate our understanding of a changing climate into responses on planning applications for new development and encourage utilisation of sustainable drainage systems that increase habitat wherever appropriate to reduce the pressure on existing drainage systems in accordance with Cornwall Council’s [Sustainable Drainage Systems policy](#).”*

[Cornwall Maritime Strategy](#) Target Outcome A: “Achieve a sustainable future for maritime Cornwall that balances appropriate economic growth, supports resilient communities and protects environmental assets.”

Objective A4) *Increase understanding of the potential for combined and cumulative effects of plans and projects on the marine environment, plus risks and opportunities presented by climate change.*

**POLICY HTA 1: Development Boundaries**

I agree with the logic about the use of the term ‘development boundary’ rather than ‘settlement boundary’.

I’m pleased to see the development boundary for Perranuthnoe excludes the areas at risk from coastal erosion. The NPPF states that

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|  | <p>new dwellings must be sustainable for 100 years, hence the importance of not building any new dwellings within the 100-year erosion line.</p> <p>Strategic fit:<br/>Draft refreshed <a href="#">Cornwall Local Flood Risk Management Strategy<sup>1</sup></a> :<br/><b>Objective C.</b> <i>Local Planning and regeneration enable sustainable development that integrates and delivers Flood Risk Management and coastal change solutions</i></p> <p><a href="#">Cornwall Maritime Strategy</a> Target outcome D: “Cornwall has healthy, safe and vibrant coastal communities that have a strong relationship with the sea and coastal environment.”<br/><i>Objective D7: Use a place-based approach to strengthen the resilience of maritime communities to the social, environmental and economic impacts rising from future events and shocks, including natural hazards, climate change and socio-political change.</i></p> <p><b>POLICY NLB 1: Biodiversity, Ecosystem Resilience and the Outstanding Natural Beauty of Landscapes</b></p> <p>I support this policy. The emphasis on enhancement fits with the overriding principle of the Cornwall Environmental Growth Strategy to go beyond protection to increase and improve the natural environment.</p> <p><b>POLICY NLB 2: Coastal Change Management Area (CCMA)</b></p> <p>The policies are clear and thorough.</p> <p>I’d advise keeping a watching brief on the emerging Cornwall Climate Change DPD to check for consistency and any changes to the local approach regarding CCMA’s. The latest iteration of the draft Cornwall Climate Change DPD is open for consultation until 25/9/20. Please be aware this is a draft and could change in the next iteration.<br/>See: <a href="https://www.cornwall.gov.uk/environment-and-planning/planning/planning-policy/adopted-plans/development-plan-documents/climate-change-development-plan-document/">https://www.cornwall.gov.uk/environment-and-planning/planning/planning-policy/adopted-plans/development-plan-documents/climate-change-development-plan-document/</a></p> |  |
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<sup>1</sup> The original 2014 Strategy is being updated in 2020 and a refreshed draft is currently open for consultation at: <https://letstalk.cornwall.gov.uk/flood-risk-management-strategy>

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|                  |   | <p>Re. DPD policy CC1 '<i>Coastal Vulnerability Zone</i>'- this will be defined for the whole coast of Cornwall in a DPD policies map. It's based on the 100-year erosion line plus a 10m buffer as shown on the <a href="#">Strategic Flood Risk Assessment map</a>. The CVZ in the DPD is the same zone as the proposed <i>Exclusion Zone</i> in the NDP. I would question if the additional 30m buffer zone is needed and if there is evidence to justify it? The CVZ is based on the planning approach for flood zones, where there's an assumption that development would be inappropriate, but if robust evidence is presented that a proposal would be sustainable and wouldn't impact on coastal change then it may be supported. I appreciate that this may be a bit confusing, but this is an evolving policy area which is subject to change. It's up to the NDP group which policies they want to propose and similar policies were accepted by the Inspector for the Newquay Neighbourhood Plan.</p> |  |
| Natural England  | General   | 'Natural England does not have any specific comments on the draft Perranuthnoe Neighbourhood Plan.'   | No recommended changes.  |
| AONB             | <p>Policy HTA2</p> <p>Policy BDL1 and NLB1</p> <p>Policy NLB4</p> | <p>Policy HTA2 related to the size and scale of new dwellings makes no reference to using conditions to remove any subsequent Permitted Development Rights to avoid what might be an acceptable development at the point of consent growing to something less acceptable.</p> <p>Policy BDL1 and NLB1 refer to the required information for applications. The new Cornwall Design Guide (in the latest draft I saw) requires the provision of a "Contextual Appraisal" and this may provide a useful alignment of direction of travel with wider CC policy as well as providing the necessary information required as part of an application.</p> <p>The policy regarding the loss of Cornish hedges suggests a valid reason will be required to facilitate this. I wonder if there should be a rather stronger position that there is a presumption against development that requires any loss of existing Cornish hedges.</p>   | <p>This is an important consideration, reference has been added within policy HTA2.</p> <p>Policy BDL1 has been amended to include reference to Contextual Appraisal and additional information added in the justification section to explain the reference.</p> <p>Changes made to strengthen Policy NLB5 to give greater recognition to the biodiversity and landscape importance of Cornish hedges.</p> |
| Highways England | General   | Thank you for providing Highways England with the opportunity to comment on the pre-submission version of the Perranuthnoe Neighbourhood Plan. As you are aware, we are responsible for operating, maintaining and improving the strategic road network (SRN) which in this case comprises the A30 trunk road which passes to the north west of the plan area. We are satisfied that the Plan's proposed  | Overall support for the Plan / No recommended changes.   |

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|                |  | <p>policies are unlikely to result in development which will adversely impact the trunk road and we therefore have no comments to make.</p> <p>This does not however prejudice any future responses Highways England may make on site specific applications as they come forward through the planning process, and which will be considered by us on their merits under the prevailing policy at the time.</p>   |   |
| National Grid  | General  | <p>Proposed development sites crossed or in close proximity to National Grid assets:</p> <p>An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines.</p> <p>National Grid has identified that it has no record of such assets within the Neighbourhood Plan area.</p>   | No recommended changes.                       |
| Wildlife Trust | <p>Policies under Objective 4</p> <p>And Policy BDL1</p> | <p>Cornwall Wildlife Trust have reviewed the Perranuthnoe Neighbourhood Development Plan (NDP) as part of the consultation period and have provided some comments/considerations for you below.</p> <p>Cornwall Wildlife Trust comments:</p> <ol style="list-style-type: none"> <li>1. Good to see reference and policies specifically referring to the Natural Environment and the inclusion of data/figures about habitat designations for the Parish. We note the Wildlife Resources Map reference and detailed on the importance of local statutory and non-statutory nature conservation areas, including County Wildlife Sites (CWS) etc. It would be useful to add some supporting text for local non-statutory designated sites in line with updated designations and how these are considered in the Local Plan. E.g.:</li> </ol> <p><b><i>Non-statutory sites include County Wildlife Sites (CWS), County Geology Sites (CGS), Roadside Verge Audit Biological Sites and Ancient Woodlands: These are of at least county importance for wildlife/geology in Cornwall and are all recognised and given weight through the planning process. Developments which would have an adverse impact on County Wildlife Sites will not be supported by Cornwall Council there are no suitable alternative sites, impacts are unavoidable and there is full provision for habitat re-creation and management.</i></b></p> | Supporting text has been added to Policy BDL1 |

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|  |  | <p>2. Good to see reference to the Biodiversity Guide, it would be useful to see the inclusion of wildlife specific development measures, in line with the Biodiversity Guide. e.g. one bat or bird box for each new build dwelling.<br/> <a href="https://www.cornwall.gov.uk/media/35367439/biodiversity-spd-v7.pdf">https://www.cornwall.gov.uk/media/35367439/biodiversity-spd-v7.pdf</a></p> <p>3. The reference to the Cornwall and Isles of Scilly Environmental Growth Strategy is also welcomed which stresses the need for us to do much more for nature and wildlife than simply minimise losses, we should be providing more opportunities for wildlife and habitats to thrive. We would encourage a reference to be included with specific reference to Target Outcome 9, which states:</p> <p><a href="http://www.cornwall.gov.uk/environmentalgrowth">www.cornwall.gov.uk/environmentalgrowth</a></p> <p><b><u>Target outcome 9: Nature in Cornwall is abundant, diverse and well connected</u></b></p> <p><b><i>For this we need:</i></b></p> <p><b><i>a) Protection and expansion of the existing, high quality, backbone of Cornwall's designated terrestrial and marine protected areas, landscapes and heritage.</i></b></p> <p><i>The designated landscapes and sites are vital to the success of this Strategy, giving us an ecological and cultural network to grow from and helping us to test ideas and new approaches. The designations of these sites provide them with a high level of protection in terms of Planning, recognising the conservation and enhancement of their special qualities is essential. The potential for these areas to also deliver environmental growth is a crucial opportunity and this Strategy seeks to provide additional strength to the value these areas are ascribed in decision making. It is essential that we view these areas as both outstanding for their special features but also as a guide for our environmental quality in other areas. Ideally we would have more outstanding landscapes, biodiversity sites and heritage features to be recognised as nationally and internationally important in future.</i></p> <p>4. The recently published St Agnes NDP is a good example of how neighbourhood plans can promote environmentally friendly developments. An extract from the plan's guidance is provided</p> | <p>Wildlife specific measures have been included as NLB1a point (v)</p> <p>Reference to Target 9 included within justification section.</p> |
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|  |  | <p>below. It would be beneficial to replicate some of these measures to join up the policies and recommendations across Cornwall's Parishes e.g. Habitat linkage should be provided for hedgehogs including 13cm x 13cm holes in the bottom edge of new fencing to allow them access to large areas.</p> <p><a href="https://www.cornwall.gov.uk/environment-and-planning/planning/neighbourhood-planning/neighbourhood-planning-in-cornwall/tab-placeholder/s/st-agnes-parish-neighbourhood-development-plan/">https://www.cornwall.gov.uk/environment-and-planning/planning/neighbourhood-planning/neighbourhood-planning-in-cornwall/tab-placeholder/s/st-agnes-parish-neighbourhood-development-plan/</a></p> <p><b>Additional Guidance</b></p> <p><i>The following list of requirements from the Cornwall Council Biodiversity Supplementary Planning Document are of particular relevance to St Agnes Parish and we strongly encourage developers to address these and demonstrate best practice in how wildlife is protected and enhanced through development.</i></p> <ul style="list-style-type: none"> <li>• <i>Developments of over 10 dwellings should provide a balance sheet or table setting out quantitatively the habitats to be lost and gained.</i></li> <li>• <i>New developments should have lighting plans informed by site ecological surveys and seek to retain dark corridors.</i></li> <li>• <i>Landscape planting should be sympathetic to local native species and habitats and avoid species known to be invasive in Cornwall.</i></li> <li>• <i>Public Open Spaces should be designed to encourage biodiversity, particularly habitats that are not well-represented locally such as woodland and wetland.</i></li> <li>• <i>At least one integrated bat box should be included in each new dwelling in a suitable position.</i></li> <li>• <i>Habitat linkage should be provided for hedgehogs including 13cm x 13cm holes in the bottom edge of new fencing to allow them access to large areas.</i></li> <li>• <i>At least one bird box for swifts, swallows or house martins should be integrated into each new dwelling in a suitable position.</i></li> </ul> | <p>Reference has been included within Policy NLB1a to strengthen guidance on provisions for biodiversity and wildlife conservation.</p> <p>Policy NLB 5 has been strengthened to include the recommended planning guidance relating to Cornish Hedges.</p> |
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|                              |                            | <ul style="list-style-type: none"> <li>• <i>A barn owl box should be provided on appropriate developments where they are situated 1km from main roads.</i></li> <li>• <i>Bee bricks should be provided, one per 2 residential dwellings.</i></li> <li>• <i>Cornish hedges should be retained in the first instance. Where they will be affected by development suitable mitigation is required and any loss should be compensated elsewhere resulting in a net gain in Cornish hedge length.</i></li> <li>• <i>Cornish hedges retained in developments should have undeveloped buffer strips alongside them. These should be a minimum of 2m wide for residential development and a minimum of 5m for industrial developments.</i></li> <li>• <i>Ideally Cornish hedges will be retained in the public realm where sympathetic management can be guaranteed. Where Cornish hedges are retained but 'sandwiched' between back-to-back gardens this should be counted as 50% loss of hedge and be compensated for.</i></li> </ul> <p>Thank you for consulting with Cornwall Wildlife Trust for this NDP.</p>   |  |
| Cornish Biodiversity Network | Policies under Objective 4 | <p>Please see attached form for map associated with these comments</p> <p>The Cornish Biodiversity Network was sent the Perranuthnoe Parish Council NDP for comment. Having read through the plan and the ancillary documents it is readily apparent that a biodiversity audit has not taken place for the Parish such that the sections that mention biodiversity contain hardly any information about the species that occur within the Parish. This is a massive failing given that Cornwall is the most comprehensively and intensively surveyed region in Britain for many taxonomic groups and especially for the Flowering Plants and Ferns. According to the ERICA database, which currently holds 4,273,881 biological records for Cornwall covering 28967 different fauna and flora taxa, 1717 different plants and animals have been recorded in Perranuthnoe Parish of which 256 are designated as Rare or Threatened (Red Data Book, BAP etc).</p> <p>The Parish Plan makes virtually no reference to rare or threatened species, which as the map above shows, have been found throughout the Parish with a notable concentration along the coast. It is important to recognise that rare species are not restricted to designated wildlife sites such as SSSIs.</p> | <p>The Map of rare and threatened species has been included as a policy reference within Policy NLB1. This is important information to support effective implementation of the Policy.</p> <p>Additional text has also been incorporated in the Justification section for policy NLB1</p> <p>It is extremely useful to have the information provided by the Cornish Biodiversity Network, to support and strengthen the Neighbourhood Plan. We regret that we were not aware that the CBN would have been happy to support us in research / and drafting of this NDP as it would have been extremely valuable to have had their advice and support at an earlier stage. It would be really helpful for other NDP teams if Cornwall Council could inform them that organisations such as CBN are available and willing to help.</p> |



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|                                    |   | <p>This Parish Plan, which has biodiversity as one of its key decision making components, but clearly took little or no account of the vast amount of readily available wildlife data (the Cornish Biodiversity Network, Botanical Society for Britain and Ireland, and no doubt other recording groups, were not consulted in its writing) is grossly inadequate in that respect.</p> <p>The plan stresses the importance of Cornish Hedges and former mine sites as havens for wildlife which is very true. Again these generalisations should have been more explicit about the particular wildlife found in Perranuthnoe in these habitats.</p> <p>The generalisations about arable fields being poor for wildlife is true of intensively farmed arable crops. The arable and horticultural fields around the coast of Cornwall can, however, be rich in arable weeds and contain many rare or threatened plants. Often these are confined to field margins but are sometimes found throughout the field, especially fallow ones. Such fields may well occur in Perranuthnoe and be of National importance.</p> <p>In contrast, the woodlands of Cornwall are mostly very poor in terms of nature conservation. They are invariably secondary woodland and dominated by non native trees and possess a very poor ground flora. This is even true of most of the woodland that has been designated as Ancient Woodland in Cornwall. Whilst it is the case that woodlands are of particular nature conservation value in many parts of England that is not true of Cornwall. Here the pre-historic clearances and thousands of years without tree cover have left Cornwall with very little woodland of any importance*. What Cornwall is special for are the many open treeless habitats such as heathland, unimproved grassland etc. So, the references to woodland throughout the document might be misinterpreted to mean that they are of nature conservation value.</p> |   |
| <p>Historic England South West</p> | <p>General Highlights importance of heritage policies: under NP Objective 5</p> | <p>Thank you for your Regulation 14 consultation on the Pre-Submission version of the Perranuthnoe Neighbourhood Plan. Our apologies for not responding before now.</p> <p>In fact we have no specific comments to offer on the policy content of your Plan. But it is always pleasing to note when communities value their distinctive historic environment and seek to protect and enhance it through the provision of informed policies in their Neighbourhood Plans. In this respect we are impressed by the Plan's identification of</p>   | <p>Overall support for the Plan / No recommended changes.</p> <p>The Parish agrees with the Historic England that historic and heritage character is fundamental to this Parish. We hope that the NDP policies will help to provide added protection for heritage assets, as these are currently under significant threat from ill-</p> |

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|  |   | <p>local heritage features and how their importance has been recognised and accommodated.</p> <p>Otherwise, we would want only to congratulate your community on its progress to date and wish it well in the making of its Plan.</p> <p>Kind regards<br/>David Stuart   Historic Places Adviser South West<br/>Historic England</p>   | <p>planned and inappropriate development in both the AONB and WHS areas of the Parish.</p>               |
| <p>Cornwall Archaeological Society</p> | <p>HTA 2</p> <p>NLB 4 (note in the final NP, Policy NLB 5 has been re-numbered NLB 4)</p> <p>HCA 2</p> <p>Note: in the final NP policy provision for archaeological sites is under policy HCA 4</p> | <p><b>Suggested changes to wording highlighted in green.</b></p> <p><b>Contents</b> – could do with a Contents page</p> <p><b>Section 1. Introduction</b></p> <p>It would be useful to give dates for plans and legislation such as the AONB Management Plan, the WHS Management Plan, the Cornwall Local Plan, the NPPF, the Shoreline Management Plan – both the publication/adoption date and where applicable the duration of the plan – here and elsewhere in the document. The NPPF is 2019 not 2018 as in para 2.36.</p> <p>Paras 1.2 and 1.3 The explanation of the abbreviation for Neighbourhood Development Plan (NDP) is given para 1.3 (twice) and repeated in a paras 1.6, 1.9, but the abbreviation has already appeared on its own in para 1.2.</p> <p>Objective 5 Heritage Character and Assets: To safeguard heritage assets, <b>historic</b> landscapes and areas of traditional settlement character across the Parish for current and future generations, recognising their international, national and local significance.</p> <p><b>Section 2 Perranuthnoe Parish: The Neighbourhood</b></p> <p>Section 2. 10 Note that the Cornwall &amp; Scilly Historic Environment Record (HER) maps the Historic Landscape Character (HLC) of most of the farmland to the south of the A394 as ‘Medieval Farmland’. This is land that has been enclosed since at least the medieval period, and possibly much earlier, which has been demonstrated to have a high potential for buried archaeological remains.</p> <p>Section 2.20 Note the HLC and high archaeological potential of the AONB area here too.</p> <p>Section 2.21 Additional bullet point required noting the high potential for previously unidentified buried archaeological remains.</p> | <p>Recommended amendments by the Cornwall Archaeological Society have been incorporated into the NDP</p> |

**Nurturing Heritage (in textbox).** The current wording of NH4 suggests that redevelopment of historic buildings should be a matter of course. Consider alternative wording

NH4: Sensitively redevelop historic buildings, **if necessary**, to support rural businesses and to support local rural communities, taking account of the advice of Historic England **and CC's Historic Environment Strategy Officer** on the conversion/alteration of historic farmsteads and places of worship. **Note: any conversion/alteration to Listed Buildings will require Listed Building Consent.**

**Section 5 Perranuthnoe Parish Neighbourhood Development Plan (NDP) Vision, Objectives and Policies: Establishing a framework for Sustainable Development**

Objective 5 Heritage Character and Assets: To safeguard heritage assets, **historic** landscapes and areas of traditional settlement character across the Parish for current and future generations, recognising their international, national and local significance.

**Policy HTA2: Replacement Buildings and Conversions.** Should note somewhere here that any works to Listed Buildings will require LBC and add to the 'Justification and Further Information' section.

**Policy NLB 5: Cornish Hedges and Hedgerows.** We like this section. It should be noted that any proposals for hedgerow removal will require planning permission.

**Policy HCA2: Heritage Value of the Historic and Cultural Attributes of the AONB**

Paragraph 11b) note that any works to Listed Buildings will require Listed Building Consent (LBC).

Suggest adding the following wording to bullet point 3 in paragraph 2 in the textbox

- the historic pattern of small irregular shaped fields, bounded by Cornish Hedges, **which will have a high potential for buried archaeological remains;**

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|                           |       | <p><b><u>Archaeological and Historical Sites</u></b></p> <p>Paragraph 2: The final sentence needs rewording – a watching brief is the lowest level of archaeological mitigation there may be a requirement for a pre-decision field evaluation and, depending on the significance of the site, the planning condition may require full excavation, analysis and publication.</p> <p>Justification and Further Information</p> <p>The National Planning Policy Framework (NPPF). Paragraphs 184-202 of the NPPF deal with conserving and enhancing the historic environment and all are relevant here not just paragraphs 184 and paragraph 11 footnote 16. Paragraphs 189-192 deal with proposals affecting heritage assets and assessment of the significance of those assets, while paragraphs 193-292 deal with consideration of potential impacts on designated heritage assets.</p>  |   |
| World Heritage Site (WHS) | HCA 1 | <p>I have read HCA1 and it is really excellent!</p> <p>I have made some small changes to wording to align with the “planning speak” of the various planning policies and guidance and also some notes on a couple of sections of the policy. My suggestions/notes follow the main body of this email.</p> <p>HCA1</p> <p>A strong priority is placed on <del>protecting</del> <b>conserving and enhancing the heritage—seven key attributes that express the Outstanding Universal Value (OUV) of the Cornwall and West Devon Mining Landscape World Heritage Site (WHS) and of the significance of the designated and non-designated heritage assets within areas of this Parish that lie within the WHS. Some of the</b> Core local heritage attributes to be protected and conserved in development planning include:</p> <ul style="list-style-type: none"> <li>§ the mining heritage landscape character associated with the great mining estates, comprising the patchwork of small-holdings, where mineworkers cottages are disbursed in a landscape of small irregular shaped fields, bounded by Cornish Hedges; and</li> <li>§ old mining sites, spoil heaps and associated features<sup>[1]</sup>; and</li> <li>§ the landscape character and features of Trevelyan Plantation<sup>[2]</sup>; and</li> <li>§ the settlement pattern of small groups of mineworkers cottages, interlinked by narrow, winding Cornish lanes, tracks,</li> </ul> | All changes recommended by WHS have been made |

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|  |  | <p>byways and footpaths, and the local heritage character of granite walled, slate rooved mineworkers cottages within settlements</p> <p>Planning applications should demonstrate that the proposed development has been based on comprehensive <del>Context</del> <a href="#">Heritage Assessment utilising appropriate methodologies and professional expertise where required, which could include</a> the following information:</p> <ol style="list-style-type: none"> <li>a. A map highlighting heritage landscapes and/or assets that are found within, or in the area surrounding, the proposed development site, or which may be affected by it;<a href="#">[3]</a> and</li> <li>b. A description of the heritage attributes of surrounding landscapes, and of any <a href="#">designated or non-designated heritage assets</a> on or near to the site. The application should outline how the proposed development will work <a href="#">to avoid harmful impacts and to conserve and enhance</a> the heritage character of the area. In cases where a development site contains a listed building or structure, developers are required to repair and conserve those structures following national and county guidelines; the approach/<a href="#">appropriate methodology</a> proposed should be made clear within the planning application; and</li> <li>c. A description of any changes proposed to field sizes, field patterns and boundaries. If any changes are proposed to Cornish Hedges these must be clearly outlined in the planning application and should adhere with NDP Policy NLB5.</li> </ol> <p>Where a development proposal may impact on the <del>core</del> <a href="#">any of the seven key attributes expressing the OUV of the WHS or their settings</a>, or <a href="#">on other specific</a> historic features within them, the planning application must include a heritage impact assessment (both desk and field-based evaluation) and, if relevant, a historic building report. This should be submitted with the planning application.</p> <p>In cases where a proposed development may impact on an area of particular heritage <del>importance</del> <a href="#">significance</a>, the Parish encourages use of the provisions in the Town and Country Planning (<a href="#">Development Management Procedure</a>) (<a href="#">England</a>) <a href="#">Order 2015</a> Part 3, Article 5 (2), for Outline Planning applications, such that Outline Planning is not considered separately from any or all of the reserved matters.</p> <p>Planning applications must demonstrate that the location, scale, size, design, layout and landscaping of any proposed development is appropriate for, and will be integrated within, its setting, so as to ensure</p> |  |
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|                               |     | <p>that development in the WHS works positively to protect and conserve the heritage character of WHS landscapes and assets<sup>[4]</sup>. Proposed development or land-use change must align with the provisions of relevant WHS Management Plan policies.</p> <p>All planning applications must provide adequate information to enable decision-makers to assess the potential impact of the proposed development on the core heritage attributes of the area. Where there is inadequate information, the LPA should request further information from the applicant before a planning decision is reached. Planning applications that successfully demonstrate an overall positive contribution to the heritage character of the landscape and/or settlement in which they are located are those that are most likely to be supported.</p>   |   |
| Devon & Cornwall Constabulary | CW5 | <p>Thank you on behalf of Devon and Cornwall police for the opportunity to comment on the draft Perranuthnoe NDP.</p> <p>I note the references to the NPPF in relation to the importance of designing out crime. My only further comment is that most Parish NDPs have included their own more specific reference to crime and disorder.</p> <p>My suggestion would be something similar to the following is also considered and included where appropriate</p> <p><b>All development proposals should consider the need to design out crime, disorder and anti-social behaviour to ensure ongoing community safety and cohesion”</b></p> <p>Such issues can apply to all forms of development not just housing. It may also be just as relevant for new car parks, footpaths, schools, play areas, commercial development etc. By designing out opportunities for crime and disorder will not only hopefully prevent or reduce these but very importantly also help reduce the fear of crime</p> <p>Regards</p> <p>Martin Mumford<br/>Designing Out Crime Officer</p> | The suggested text has been included within the explanatory text for Policy CW5 |

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|                        |                      | Devon and Cornwall Constabulary  |  |
| Ludgvan Parish Council | BDL1<br>HTA2<br>HTA3 | <p>Ludgvan Parish Council. Feedback from this council is that:</p> <p>The proposed Perranuthnoe Neighbourhood Development Plan is a strong and well-written document, and that there are some policies in particular that the council wishes to support: BLD (building design) and HCA (heritage character. It was also agreed to recommend that Perranuthnoe adopts a Parish Design Statement.</p>  | <p>Overall support for the Plan / No recommended changes.</p> <p>The Parish has noted the recommendation to develop a Design Statement and agrees that it would be good to adopt a Design Statement.</p>   |
| St Hilary Parish       |                      | <p>A meeting was held with members of St Hilary Parish Council to discuss the NDP and the Local Green Space areas adjoining the Parish. St Hilary indicated their overall support for the NDP, and for the proposed Local Green Space areas. They expressed their desire to make sure that the NDPs of both parishes work well together, to support an overall pattern of development that respects the valued character of protected AONB and WHS landscapes. St Hilary Parish have commissioned a Local Landscape Character Assessment and are developing their NDP. It was a very useful and informative meeting.</p>   | <p>Overall support for the Plan / No recommended changes.</p>  |
| Ramblers Society       |                      | <p>Feedback provided by phone, including additional data and information and recommendation. The Ramblers Society representative emphasised the importance of working to ensure that the NDP results in actual change on the ground. In relation to PROW in particular, he emphasised the need to ensure that operational procedures are clear. He agreed with the NDP policy position underlining the local value of PROW, and suggested that implementation of it should translate into: ongoing monitoring and maintenance of PROW, the reporting and mapping of any anomalies, the establishment of new footpaths and cycle routes where these would support healthy lifestyles, the reinstatement of disused footpaths and bridleways, and the need to maintain the overall integrity of the network. He suggested that to achieve this the Parish may want to consider working with the Ramblers society, to establish operational procedures.</p> | <p>Additional information has been added to the Policy Justification section. The Policy wording has also been strengthened in order to reflect the recommendations made by the Ramblers Society representative on the need to ensure that the policy would be actively operationalised.</p> |

### Feedback received from Cornwall Council Planning Department Neighbourhood Planning Team

Note: In October 2021 the Parish Council submitted the final draft of the NP to the Planning Department Neighbourhood Plan Team to ask that they review it prior to formal submission. The following feedback was received, which was helpful in enabling the Parish to finalise the document. The Parish Response column outlines how the NP has been amended to address the issues raised by the Planning Department

The Parish had previously received comments from the Planning Department on the 2019 draft of the Neighbourhood Plan and met with the Planning Team to discuss the first draft of the NP. No subsequent comments were received from the Planning Department during the 2020 Reg 14 consultation process.

| Policy     | Comment   | Parish Response  |
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| Policy CW1 | First two lines don't read well, suggest changing 'the applicant must' with 'should'. How can you demonstrate that there is no need for a previous use? | <p>Policy wording has been revised:</p> <p>'Must' has been changed to 'should' as recommended.</p> <p>Reference to a requirement for 'evidence that there is no significant value to communities in maintaining the current or previously established use of the building and /or land' has been removed.</p>  |
| Policy CW3 | I'd advise listing these sites within the policy as well as the maps. What if there isn't already public access to the local green space?               | <p>Policy wording has been revised:</p> <p>LGS sites are now listed within the Policy as well as the maps and further information is given in the justification section, with detail provided in the Audit Forms in the LGS Annex.</p> <p>The wording of policy CW3 has been changed to clarify that this policy does not provide for public access to LGS sites. Point 3 now reads 'should not reduce <i>any existing</i> public access to LGS'</p> <p>Policy CW3 has followed national guidelines which specify that LGS can include sites that do or don't currently have public access.</p> <p>Refer: <a href="https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space">https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space</a></p> <p><i>'Some areas that may be considered for designation as LGS may already have largely unrestricted public access, though even in places like parks, there may be some restrictions.</i></p> <p><i>However, other land could be considered for designation even if there is no public access (e.g. green areas which are valued because of their wildlife, historic significance and/or beauty)'</i></p> |



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|      |  | <i>'Designation does not in itself confer any rights of public access over what exists at present. Any additional access would be a matter for separate negotiation with land owners whose legal rights must be respected.'</i>   |
| CW5  | Change wording from 'strong weighting' to 'support'  | <p>Policy wording has been revised:</p> <p>The wording '<i>strong weighting</i>' will be given to proposals which demonstrate a social, physical and aesthetic understanding of their location' has been removed and the sentence changed to '<i>Development proposals should demonstrate a social, physical and aesthetic understanding of their location...</i>'</p>  |
| HTA1 | Change 'permitted' to 'supported'. I think you send the low res version but the maps are hard to read  | <p>Policy wording has been revised:</p> <p>'Permitted' has been changed to 'supported'.</p> <p>The full size PDF version of the Neighbourhood Plan is available in the drop box link as it could not be emailed and contains high res versions of the plan and all maps, with full size maps provided in the Appendices.</p>  |
| HTA2 | Policy HTA2 and 2ii- May be seen as too onerous and there may be permitted development rights for some things that you are trying to control in this policy. You also cannot affect planning processes within policy | <p>Policy wording has been revised:</p> <p>All references to the word 'must' have been replaced with 'should', where the policy provision is not likely to be required in all situations.</p> <p>References to planning processes have been removed. This includes the reference to the requirement that 'Permitted development rights should be removed by condition as part of any planning approval granted'. It is recognised that assessment of whether Article 4 direction would be appropriate will depend on the circumstances of the proposed development and assessment of whether removal of permitted development rights would be necessary to protect local amenity or well-being of the area in line with NPPF paragraph 53.</p> <p>Policy wording has been amended to better align policy wording with national / county planning policy.</p> <p>Further information and explanation has also been added to the Justification and Evidence Base sections accompanying this policy in the NP, to clarify alignment of it with the provisions in national and county planning policies and regulations. And to clarify why the</p> |

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|  |  | <p>Parish feels there is a need for more specific local planning policy guidance on replacement buildings and conversions.</p> <p>Concerns were repeatedly raised in public NP consultations regarding the negative impact of replacement buildings and conversions on Parish landscapes, settlements and sense of place. The Local Landscape Character Assessment (LLCA) and Cornwall's AONB Management Plan also specifically refer to the negative impact which replacement buildings have had on the character and natural beauty of coastal AONB landscapes in the Parish. The Cornwall AONB MP specifically cites Perranuthnoe as one of the places in Cornwall where replacement buildings have had a negative impact on the scenic beauty of AONB landscape character.</p> <p>Considerable work has been undertaken by the Parish to develop this NP policy, to assess the issues raised, review planning policies and regulations, review the findings of the LLCA, and of planning decisions over recent years, in order to identify opportunities to establish local planning policy guidance in the NP which can help to clarify and strengthen the application of national and county policies to the local context. This policy complements, and should be used alongside, others in the NP.</p> <p>Specific concerns raised in public consultations in relation to <u>replacement buildings</u> are that these have been:</p> <ul style="list-style-type: none"><li>- of a scale and size that greatly exceeds the building being replaced;</li><li>- of scales and designs that are overbearing on, and out of keeping with, their setting / location; and the negative impact of this on AONB landscape character and scenic beauty, and on local heritage character and 'sense of place'.</li><li>- The extent to which past planning decisions are currently being used as a precedent for future decisions, and therefore the increasing risk of development impact that will further erode local AONB landscape character and scenic beauty.</li></ul> <p>Specific concerns raised in relation to <u>building conversions</u> are relative to the conversion of temporary, non-residential structures for residential use, and the need for clearer guidance on what type of buildings are appropriate for conversion.</p> <p>Following subsequent review of CLP and national policy, it was clear that there is the need for an NP planning policy, to ensure that</p> |
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|  |  | <p>generic planning policy provisions in county and national are appropriately applied to the local context.</p> <p>In particular Cornwall Local Plan Policy 7 points 1 and 3, so that interpretation of the generic and undefined wording highlighted below in italics is based on clear NP policy guidance, (which has in turn been based on the results of local landscape assessment (LLCA), local research and consultative assessment.)</p> <p>Cornwall Local Plan policy 7 point 1: ‘Replacement dwellings <i>broadly comparable to the size, scale and bulk of the dwelling being replaced and of an appropriate scale and character</i> to their location’</p> <p>Cornwall Local Plan policy 7, point 3: Reuse of <i>suitably constructed</i> redundant, disused or historic buildings that are <i>considered appropriate to retain</i> and would lead to <i>an enhancement to the immediate setting</i>. The building to be converted should have an existing lawful residential or non residential use and be ten years old or greater;</p> <p>The aim of this NP policy is to achieve more positive development impact from replacement buildings and conversions, and to reduce the risk of an increasing spiral of negative development impact on designated AONB /WHS landscapes, whereby precedents set by past decisions are used as the basis for future development.</p> <p>It is hoped that the provisions in this policy will help to set a clear standard, providing Parish level planning policy direction, to support more appropriate application of generic and undefined wording in national and county planning policies to the Parish context.</p> <p>The criteria provided in NP Policy HTA 2 have been guided by the CLP Policy 7 supporting text which explains that ‘the appropriateness of buildings for conversion will depend on their scale and method of construction, structural soundness and the ability to convert the building without the necessity of substantial demolition or substantial rebuilding operations.’</p> <p>CLP Policy 23 is also directly relevant to this policy as it emphasises that: ‘Development should be of an appropriate scale, mass and design that recognises and respects landscape character of both designated and un-designated landscapes. Development must take into account and respect the sensitivity and capacity of the landscape</p> |
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|      |  | <p>asset, considering the cumulative impact and the wish to maintain dark skies and tranquillity in areas that are relatively undisturbed.'</p> <p>'2a Great weight will be given to conserving the landscape and scenic beauty within or affecting the setting of the AONB. Proposals must conserve and enhance the landscape character and natural beauty of the AONB and provide only for an identified local need and be appropriately located to address the AONB's sensitivity and capacity.'</p> <p>This aligns with Paragraph 172 of the NPPF which states that. 'Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues.'</p> <p>It is noted that national planning regulations enable restrictions to be placed on permitted development rights within designated WHS and AONB landscapes.</p>   |
| HTA3 | <p>Policy HTA3- Similar comment to above, the local connection criteria and methodology is set nationally and the NDP cannot override this. Why is the threshold no more than 10 dwellings specifically?</p> | <p>Policy wording has been revised:</p> <p>References to the word 'must' have been replaced with 'should' where they may not be required in all situations.</p> <p>Policy wording has been amended to clarify adherence with national and county policy provisions in respect of local connection. This NDP policy does not intend to override criteria or methodologies set nationally, but rather to add local policy direction, in order to enable national criteria and methodologies to be appropriately applied to the Parish context. The intent is to ensure that development proposals provide the information necessary to enable well informed and robust assessment to be made against national criteria.</p> <p>The reason for suggesting a threshold of no more than 10 dwellings is to ensure that exceptions sites are proportionate to the small size of Parish settlements. The policy wording has been amended to clarify this, and that the figure of 10 dwellings is an 'expectation' rather than a requirement. The policy wording now reads: 'Given the small size of Parish settlements, in order to be proportionate, exception sites are expected to not exceed 10 dwellings'. The Parish feel that it is important to provide this local NP policy guidance on the expected threshold for exception sites and affordable led schemes, in order to help ensure that affordable housing is successfully integrated within the Parish. Key development planning issues pertaining to the Parish</p> |

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|   |   | context include the small size of settlements, the limited socio-economic infrastructure and resources available, and the sensitive nature of designated landscapes.  |
| General   | <p>General- an examiner will replace all 'must's with 'should' within policy wording</p> <p>I think you are in a position to be able to submit the NDP with its evidence base, basic conditions statement and consultation statement to Cornwall Council for the next stages of the statutory process. Once we have signed it off as legally compliant, we will hold another 6 week consultation before the plan goes to an independent examiner and finally a referendum. This process usually takes around 6 months from the point of submission.</p>   | <p>All policies have been cross checked for appropriate use of the word 'must' and although not all references have been deleted, 'must' has only been used where the policy provisions are compulsory in all circumstances. This follows the guidance provided in the national Locality Neighbourhood Planning guidelines: 'Writing Planning Policies A Toolkit for Neighbourhood Planners' which states (p22) that:</p> <p>'must' and 'must not' – only use 'must' where you are sure that the requirements of the policy are compulsory in all circumstances. This is likely to be unusual but is appropriate where the policy is binding.</p> <p>'should' and 'should not' – this leaves room for exceptions and, while it is commonly used, 'should' opens the door to applicants to justify why the policy doesn't apply to them.</p> |
| Other:<br>Evidence Base for NP Principle Residency policy CW4 | <p>The Parish asked for specific feedback as to whether the evidence base for their Principle Residency policy is adequate, and whether Cornwall Council had any additional data or advice or where the Parish could access data to support their policy. The response received was as follows:</p> <p>You have done a lot of work to gather supporting evidence for your principal residence policy, and the examiner will take this into account, because as you say, the 2011 data isn't particularly helpful to justify your policy. If you wanted to build on this evidence, you could speak to local lettings agents and conduct some market research using websites such as AirBnB, but the approach you have taken so far does provide valuable evidence for your policy so I think that would be sufficient.</p> | <p>In conducting the local survey, the Parish assessed properties listed by local agents, or on AirBnB and other websites. This initial research was then backed this up via a house to house assessment by local residents with local knowledge of which houses are lived in and which are holiday-lets or second homes.</p>   |

## APPENDIX 5

### Regulation 14 pre-submission Consultation: Public Consultees Feedback on Perranuthnoe Parish Neighbourhood Plan

The following tables show the feedback the Parish has received from the regulation 14 consultation on the Neighbourhood Plan, the tables are divided into two sections:

- 1: Those supportive of the Plan and / or with recommendations to strengthen existing policies;
- 2: Those opposing policies within the Neighbourhood Plan, or who request change that would significantly affect its policies and objectives

| <b>1: Supportive of the Plan and / or with recommendations to strengthen existing policies</b> |  |  |   |
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| <b>Parish Resident</b>   | <b>Paragraph or Policy</b>   | <b>Comment</b>   | <b>Parish Response</b>  |
| Yes x 2  | Strong Support for overall Plan<br><br>Highlights importance of:<br>CW 3<br>Objectives 4 and 5<br>DM 1 | My husband and I are very impressed with the whole format, detail and depth of this Plan. It takes into account residents' concerns in many areas with which we agree.<br><br>We are very pleased to see that there are many references to <b>safeguarding the natural and historic environment</b> whilst working to enable residents and visitors to enjoy local amenities.<br><br>We think it is essential that the <b>Green Areas</b> are protected in order to maintain the individual hamlets and we support those on the Plan.<br><br>We feel it is very important that Council officers are pro-active in their duties and areas of expertise when facilitating this Plan. | <u>To Note:</u> Strong support for:<br><br>Depth of Analysis & Level of Detail in the Plan<br><br>The Focus of Policies on safeguarding the natural & historic environment and Green Space.   |
| Yes  | Overall Support for Plan<br><br>Highlights importance of:<br>CW 3<br>CW 5<br>HTA 1                     | <b>I fully support the entire Neighbourhood Plan in particular:</b><br><br><b>CW3 'Local Green Space'</b> : so important for the wellbeing of the community<br><br><b>CW5 'Spatial Planning and Cumulative Impact'</b> : Essential that the infrastructure of the village is taken into account when studying planning applications<br><br><b>HTA 1 'Development Boundaries'</b> : Especially important to accommodate starter homes and retirement homes  | <u>To Note:</u><br><br>Full support for the entire Neighbourhood Plan, with strong support emphasised for:<br><br>Protection of Local Green Space<br><br>Conserving Historic & Heritage Character across the Parish<br><br>The importance of assessing the Cumulative Impact of development in determining planning applications. |

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|            | <p>HTA 2<br/>BDL 1<br/>NLB 2<br/>NLB 5<br/>(note now renumbered NLB 4)<br/>HCA 2</p> | <p><b>HTA2 ‘Replacement Buildings and Conversion’:</b> Renovation NOT replacement of traditional buildings</p> <p><b>BDL 1 ‘Building Design, Scale and plot Layout and Landscaping’:</b> Decision makers should listen to local concerns. Recent mistakes have been made, thus giving leverage to other unsuitable designs</p> <p><b>NLB2: ‘Coastal Change Management Area’:</b> Coastal erosion is a serious problem. It is so very important that cliff areas are protected and plants ie tamarisk should not be cut or removed.</p> <p><b>NLB5 ‘Cornish Hedges and Hedgerows’:</b> Cornish Hedges should be preserved NOT replaced with a cemented stone wall</p> <p><b>HCA2 ‘Heritage Attributes of the AONB’:</b> It is so important to preserve our unique ancient distinctiveness for future generations</p> | <p>The Coastal Change Management Area and need to plan for coastal erosion</p>   |
| <p>Yes</p> | <p>Strong Support for overall Plan and all of its policies</p>                       | <p><b>I have read the policies and am in agreement with all the policies and the content.</b> I have attached a schedule per policy number to support this.</p> <p>Each Policy in the NDP is listed alongside the sentence: ‘I wish it to be known that I am in complete agreement with the problems highlighted in this report and that I fully support and believe that this intended policy will address these problems for the future protection of the Perranuthnoe Parish’</p> <p>All Policies are then listed</p>  | <p><u>To Note:</u> Strong support for all NDP policies.</p>  |
| <p>Yes</p> | <p>Strong Support for overall Plan<br/>Highlights importance of:<br/>CW 3</p>        | <p><b>What an excellent NDP. I fully support it.</b> Just a couple of typos: P146 “Acton Castle” and check spelling of Stackhouse Cove.</p> <p>You have covered all the areas of concern that people have mentioned to me during my time as a Parish Councillor. I like the commitment to a review in 2025.</p> <p>I am very pleased that you have emphasised the importance of our Parish green spaces (Policy CW3 Local Green Space)</p>  | <p><u>To Note:</u><br/>Confirmation that the Plan reflects the key issues of concern to people in the Parish<br/>Typos Corrected</p> |

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| Yes | Overall Support for Plan<br>DM 1 | I am happy with the draft Perranuthnoe parish NDP and have nothing to add. <u>I just hope it holds some sway in future planning decisions and can be implemented with some urgency</u> given the increasing number, scale and design of new builds happening in the area.  | Support for the Plan and urgent need for implementation of it.  |
| Yes | Overall Support for Plan         | I have read this plan and support it   |   |
| Yes | CW 5<br>HTA 2i<br>BDL1<br>HTA 4  | <p><b>CW5 'Spatial Planning and Cumulative Impact'</b> (page 59)<br/>Traffic needs to be slowed down. Visitors should be discouraged from parking where they feel like and causing mayhem in July and August</p> <p><b>HTA 2i 'Buildings Conversions'</b>: (page 71): Try to stop ghastly modern block like houses with zero architectural merit and</p> <p><b>Policy BDL1: Building Design, Scale and Plot Layout and Landscaping</b></p> <p><b>HTA4 'Caravans and other forms of moveable accommodation'</b> (page 78): Get rid of caravans in boat cove lane and stop campervans parking overnight in the car park. Why can't they stay legally in the official campsite which is well run.</p> | <p><u>To Note:</u><br/>Support for guidance provided in HTA2 and BDL1 and need to address further spread of visually intrusive building design.</p> <p>HTA4: importance on having local policy guidance to address increasing number of caravans being left in fields and used in excess of 28 days</p> <p>Re CW5: The Parish has been advised that the NDP cannot provide any more specific guidance / actions to address speeding and parking problems within the NDP. Traffic and parking plans are being produced for the villages of Goldsithney and Perranuthnoe, and it is hoped that policy CW5 will ensure parking and traffic pressures are effectively considered /assessed within Planning decisions.</p> |
| Yes | All Policies                     | <p>The following statement is given against each policy number in the Neighbourhood Plan:</p> <p>'I wish it to be known that I am in complete agreement with the problems highlighted in this Plan and that I fully believe that this policy will address these problems for the future of Perranuthnoe Parish'</p>  | <p><u>To Note:</u><br/>All policies supported, and confirmation that they address the key planning issues in the Parish.</p>  |
| Yes | Strong Support for overall Plan  | <p>The team has done a great job and clearly put a lot of effort into creating this NDP. Thank you for all your work.</p> <p><b>I agree completely with the content.</b></p> <p>My only concern is what weight will the NDP have? The Planning Dept at Cornwall Council appears to wilfully ignore some of its</p>   | <p><u>To Note:</u><br/>Concern that CC Planning Dept does not abide by existing planning policies in particular relative to the AONB and that it will also ignore the NDP policies.</p>   |



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|     | Highlights importance of:<br>DM 1  | own planning guidelines and those of the AONB. Will this simply be another set of guidelines to be ignored?<br>Sorry if this is disheartening!   | Hopefully policy DM1 will help to address this concern. It is an issue which has been raised repeatedly during consultations over the last few years.  |
| Yes | Overall Support for Plan<br>Highlights importance of BDL 1                           | <b>Policy BDL1: Building Design, Scale and Plot Layout and Landscaping (page 83)</b><br>Although I agree with everything in the Neighbourhood Plan, I particularly welcome this policy. About ten years ago a prominent replacement dwelling was built with vast areas of glazing and subsequent intrusive interior and exterior lighting. The planning application form stated that the site could not be seen from a public road, public footpath etc. and it would not require an altered vehicle access. This was inaccurate. The proposed Neighbourhood Plan will hopefully enable greater scrutiny of future planning applications and landscaping and lend weight to local decisions. | <u>To Note:</u> Strong support for the Plan in particular importance of clear guidance provided in Policy BDL1.  |
| Yes | Overall Support for Plan<br>Issues raised highlight importance of:<br>BDL 1<br>HTA 2 | <b>Policy BDL1: Building Design, Scale and Plot Layout and Landscaping</b><br><b>Policy HTA2 Replacement Buildings</b><br><b>I agree with the Neighbourhood Plan as a whole.</b> I would like to emphasise that new build or replacement buildings should blend in with existing dwellings and landscape which has not always happened in the past.  | <u>To Note:</u><br>The importance of providing clear planning guidance to ensure Building Design is not visually intrusive & is in keeping with local landscape / settlement character.  |
| Yes | Overall Support for overall Plan<br>Highlights importance of:<br>NLB 2               | Whilst I generally agree with all the points and objectives of this Plan, I would hope no blanket decision making is reached in any one area, which may stifle the opportunity for original thinking and contribution to the landscape, economy or vibrancy of the Parish.<br><br>I do agree strongly with the policies on:<br><b>NLB 2 Coastal Change Management</b>  | <u>To Note:</u><br>The PC are currently developing a new website to make sure information and PC meetings are more easily accessible to the general public.<br><br>It is important that the consultative process adopted for the NDP continues to provide a means for local people to contribute to a positive path to development in the Parish |

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|     | HTA 3<br>EB 2  | <p><b>HTA3 Affordable Housing</b></p> <p><b>EB2 Sustainable and Resilient Agricultural Production</b></p> <p>It is good to notice that the Plan acknowledges the importance of local opinion - 3.6 "...whereas people felt very powerless to influence development planning..."</p> <p>A suggestion to promote wider knowledge of Planning issues etc now that The Cornishman no longer publishes such things. Could be greater publicity be given to promoting Parish Council Meetings where these issues are discussed, as not everyone can easily access the current notice boards and may wish to participate in discussions they deem relevant to their particular area.</p> | <p>Concerns over the current feeling that decisions are made remotely and the impacts of planning decisions on local people are largely ignored by the Planning Dept.</p> <p>When implementing the Plan, it is important for each planning application to be assessed according to its individual merits and in relation to its distinct setting.</p>  |
| Yes | <p>Strong Support for overall Plan</p> <p>Issues raised highlight importance of:</p> <p>BDL 1</p> <p>HCA 2</p> <p>DM 1</p> | <p>After having moved to Perranuthnoe in 1978, with my family, and having witnessed, in recent years, some alarming and badly thought-out planning changes to the village, with seemingly no thought for retaining this AONB's character and villagers quality of life. I'm extremely grateful for this plan and <b>support it wholeheartedly</b>. I will watch with interest, how this changes the approach by Cornwall's planning officers, as to what gets approved, hopefully arresting the trend towards Perranuthnoe becoming a business park rather than a quiet coastal village.</p>  | <p><u>To Note:</u> Strong support for the NDP, and its potential role in helping to address the problems caused by recent patterns of planning &amp; development where planning decisions don't take into consideration the setting / context or the impacts of development decisions on villagers' quality of life.</p>   |
| Yes | <p>Strong Support for overall Plan</p> <p>Highlights importance of:</p> <p>CW 3 in particular</p>                          | <p>I have <b>strong support for the entirety of the draft Perranuthnoe Parish Neighbourhood development plan 2020 - 2030</b> and all of the policies within it.</p> <p>In addition to my support for the entirety of the policy guidance in the plan I would also like to make comments on some of the policies (detailed below) below which I feel require even more special attention.</p> <p><b>Policy CW3 Local Green Space</b> (page 51)</p>   | <p><u>To Note:</u> Strong support for the Plan and in particular:</p> <p>CW3: Local Green Space Policy in particular Area A.</p> <p>BDL1 and HTA2: The importance of clear local planning guidance to ensure Building Design does not have a negative impact on AONB designated areas, is in keeping with valued local character / is not visually intrusive.</p> <p>HTA 1: Strong support for proposed Development Boundaries</p> |

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|            | <p>LGS Area A<br/>HTA 2<br/>BDL 1</p>   | <p>I very strongly support the policy guidance provided under Policy CW3 on Local Green Space, and the need to ensure that all of the areas of 'local green space' identified for the AONB area of Perranuthnoe in Figure 21.</p> <p>Perranuthnoe parish is rural community and as such the Local Green Spaces are integral to the character of the community. The erosion of these green spaces would erase the character of the parish and so need to be protected.</p> <p>Of particular importance to me is Area A.</p> <p><b>Policy HTA2 Replacement Buildings and Conversions</b> (page 71)</p> <p>I very strongly support the entirety of this policy guidance.</p> <p>The parish has suffered over the last decade with inappropriate building conversions and replacement buildings that have detracted from the distinctive character of the parish and its related AONB areas and there is an urgent need to ensure that future developments do not erode this distinctive character further, and where possible to reverse the harm that has been done in the past.</p> <p><b>Policy BD1 Building Design, Scale and Plot Layout and Landscaping</b> (page 83)</p> <p>I very strongly support the entirety of this policy guidance.</p> <p><b>Policy HTA1 'Development Boundaries'</b> (page 65)</p> <p>I very strongly support the entirety of this policy guidance</p> |   |
| <p>Yes</p> | <p>Strong Support for overall Plan</p> <p>Highlights importance of:</p> <p>CW 3 in particular</p> | <p><b><u>I strongly support the Neighbourhood Plan.</u></b></p> <p>The policies focus on key development planning issues in this Parish and provide an important local framework for decision-making. Maybe, at last, we will get planning decisions that are based on some knowledge of this area, and can benefit people and place.</p> <p>I very much hope that this Plan will change Cornwall Council Planning Department's current way of operating in this Parish and will help to achieve development that is based on</p>  | <p><u>To Note:</u></p> <p>Confirmation that the NDP focusses on the key planning issues for this Parish. In particular the importance of:</p> <ul style="list-style-type: none"> <li>- having a local planning framework adapted to people and place</li> <li>- having a detailed &amp; in-depth Plan to enable interpretation of broad county / national policies at local level.</li> </ul> |

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| <p>LGS areas<br/>A and D<br/>CW 4<br/>HTA 1<br/>HTA 2<br/>HTA 4<br/>BDL 1<br/>HCA 1<br/>HCA 2<br/>EB 2<br/>EB 3<br/>DM 1</p> | <p>knowledge and appreciation of the area, rather than the personal design tastes and whims of individual planning officers who may have never even been here.</p> <p><b>General comments</b><br/>The depth of information and analysis in this Plan is really useful. So often planning decisions seem to be based solely on rather vague policy wording in the Cornwall Local Plan or national framework, and decisions seem to depend on Planning Department officers' interpretation of that generic wording. Decisions very often ignore supplementary planning documents, especially those related to the AONB and WHS. It seems as though decision-makers and developers aren't aware of SPDs or perhaps they just feel they don't need to consider them? Hopefully this NDP will make sure that they do. It is very well structured and provides clear policy guidance that is actually adapted to an understand of the local area. It is what we need here.</p> <p>It is also really useful to have national and county planning information summarised under each policy in the Justification sections of the Neighbourhood Plan. It means that people can easily access a summary of relevant information in a very practical way. This is the only document that I have ever seen which consolidates relevant policy information against development planning issues in this way. It is excellent. Hopefully it will help to ensure that developers and decision-makers will be a bit better informed, and will actually consider the issues and policies they are supposed to.</p> <p>I have the following comments and some recommendations on specific policies:</p> <p><b>Policy CW3 Local Green Space</b><br/>The protection of areas of green space that are of special value to local communities is very important. I live within the AONB area of the Parish and in particular I strongly support the designation of <b>Areas A and D</b> as Local Green Space. These are of particular value to this community.</p> | <p>- the summary info provided in the 'Justification' sections under each Policy in making national / county planning information accessible.</p> <p>- Policy CW3 in identifying important Local Green Space areas, in particular areas A and D.</p> <p>- Development Boundaries (HTA 1)</p> <p>- Policies BDL1 and HTA2 in providing clear and strong local planning guidance to ensure that building design, scale etc takes account of the local AONB / WHS setting, so that development does not continue to erode AONB / WHS character.</p> <p>- Policy DM1: Importance of this policy in providing a requirement for / monitoring of effective NDP implementation.</p> <p><u>Changes:</u><br/>HCA 2: Add reference to the need to consider designation of priority heritage areas as Conservation Areas.<br/>EB2: Add further guidance in relation to agricultural occupancy conditions.<br/>EB3: Add policy guidance on Freedom Campsites and glamping pods</p> |
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**Policy HTA1 Development Boundaries**

The Development Boundaries established for Perranuthnoe village are appropriate and will help maintain the social and physical cohesiveness of this village. I agree that a big concern is ribbon development and this policy will help to limit the risk of this, and the associated erosion of village character and community. The boundaries proposed in this draft plan appear to be similar to those put out for consultation in 2018, which I also supported.

**Policy HTA2 Replacement Buildings and Conversions**

Policy HTA 2 provides much needed policy guidance for replacement buildings and conversions. It is these buildings that in recent years have had the greatest negative impact on landscape and settlement character within the AONB area of the Parish.

Currently Cornwall Planning Department appear to give very little consideration to whether replacement buildings and conversions respect / contribute positively to the local character of the AONB, they seem to allow buildings that are twice or three times as big as the existing structure and which are totally out of keeping with the surrounding area. This has had a significant negative impact on the local area. Perranuthnoe is even highlighted in the AONB management plan as one of the areas worst affected by poor Planning Dept decision-making resulting in a negative impact on the AONB. This is very sad for the people who live here and have to live with the impact of Planning Officers decisions every day. Presumably the Planning Dept are unaware of what valued local character is here, and clearly don't seem to place any weight on respecting it? This NDP policy provides clear guidance to address this.

**Policy CW4 Principle Residency**

This is an important policy due to the escalating rate at which the community of Perranuthnoe village and surrounding areas is being taken over by second home owners and for holiday lets. Like the fate of many coastal communities in Cornwall, Perranuthnoe risks becoming yet another dead ghost village, made up of holiday-homes. It would be a tragedy if this vibrant

and precious community continues to be eroded. Although this principle residency policy is unlikely to solve the issue as it only relates to new buildings, it is at least a start.

**Policy BDL1 Building Design**

This policy provides much needed guidance to help define what valued and 'distinctive local character' is in this Parish, and how building design can work positively to maintain and enhance that valued local Cornish character. This Parish is covered by AONB and WHS designations and this policy aligns closely with the policy guidance provided in those SPDs and indeed within Cornwall Local Plan. Consideration of the impact of building design on AONB / WHS landscape and settlement character should be a priority consideration. Currently in Planning Dept decision-making it is barely considered at all, and many decisions run directly counter to the AONB / WHS SPDs.

There is an ongoing stream of visually invasive and garish new development within the AONB and WHS areas of the Parish, which is detracting hugely from the valued local Cornish character of this area. As outlined for HTA2, it is sad that Perranuthnoe is cited in the AONB Management Plan as an area where the recent imposition of large and visually intrusive buildings is detracting from what should be a protected landscape. The situation continues to get worse, with each large, garish new building being use as a 'precedent' grounds for the next.

Planning Dept decision-making on whether building design contributes to or erodes valued local character seems to be a very grey area. Who decides whether a new or replacement building is 'innovative' or 'enhancing' and on what grounds?

Planning applications almost never provide information on the setting for the proposed development or assessment of impact on it. Within the AONB areas of this Parish the guidance provided in the AONB Management Plan policies is largely ignored by Planning Dept officers and even Cornwall Council Plan policies are largely ignored. Currently it seems that decision-making on building design is solely based on the

judgement of an individual Delegated Planning Officer, whether that individual likes the design or not. Decisions are based on their own personal architectural tastes rather than on any knowledge or understanding of the area, or assessment of impact on it. This is wrong and not how planning should work. It needs to change. Each poor planning decision cannot continue to be used as a precedent for the next. We need to press reset to start to get planning decision that actually align with AONB policies. Individual Delegated Planning Officer's decisions affect people and places for generations

There is a need for clear and detailed local criteria to guide decision-makers in understanding what the valued and distinctive local character is here, and how building design can contribute to it. There needs to be some clear guidance to clarify the grounds on which individual planning officers make their judgements. This Neighbourhood Plan policy provides that clear and appropriate guidance. It reflects what is valued here and I fully support it.

**Policy HTA 4 Caravans in Fields**

It is really important to have some Parish level guidance on the planning situation with caravans left in fields for extended periods of time (sometimes years) as this is an increasing problem, especially in the AONB. I wonder if there needs to also be something about use of sheds and huts for extended periods for camping or whether that is a separate policy issue?

**Objective 5, Policies HCA1 and HCA2: Heritage Character and Assets**

This is a key policy area for both the AONB and WHS areas of the Parish. Currently the Planning Dept seem to give very little to no consideration of development impact on historic assets or heritage character. We need some clear local policy guidance to ensure that these impacts are considered effectively, and to identify priority heritage areas and assets. NDP policies HCA 1 and 2 do that. However, I wonder if protection needs to be stronger, and whether the Parish needs to go a step further for some priority heritage areas and designate them as Conservation Areas. Currently Perranuthnoe and Goldsithney

village centres are officially recognised as Conservation Areas. However, other really important and highly valued areas are not. I would suggest that the hamlets of Trenow, Trebarvah and Trevean should be considered by Cornwall Council for designation as Conservation Areas and I suggest that this NDP needs to initiate that process.

**Policy EB2 Agriculture**

It is good to see that the Neighbourhood Plan gives recognition to the importance of farming and agriculture as the main land-use in the Parish. It is also good that Perranuthnoe Neighbourhood Plan Policy EB2 highlights the importance of sustainable agricultural production.

Much of the focus of Policy EB2 is currently on ensuring that housing or other development does not have a negative impact on farming or agricultural land. This is important however I would suggest that this policy also needs to provide clearer local guidance in relation to agricultural occupancy conditions.

**Policy EB3: Campsites and Holiday Accommodation**

I suggest there is a need to include Parish level guidance on 'freedom campsites' as these are an increasing planning issue nationally. In particular in the AONB to provide clear guidance on how big these sites can get and to provide the grounds for decision making on where they can be located. There is also a need for better guidance on glamping pods.

**Policy DM1: Implementation and Monitoring**

This policy is important. The Plan will only be effective if it is used effectively. Currently there seems to be no monitoring of whether planning decisions are made according to county /national policies and planning regs, or not. It seems to be a bit of a free for all, and it is worrying how often planning decisions do not align with planning policies, especially in the AONB. The lack of monitoring is a real weakness and leads to questions over transparency of decisions. National level analysis in 2019 highlighted a number of concerns relating to the impact of 'revolving door' scenarios, overlap between development business and decision-making roles by officers, and that



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|     |  | <p>planning decision-making is often left far too open to influence by developers. It is important to have systems in place to monitor decision-making in order to ensure that there is transparency and independence and that decisions are made according to planning policy / regs. The decisions individual planning officers make affect people and places for generations. Hopefully this NDP if implemented effectively will help to make planning decision-making much more transparent here.</p>  |   |
| Yes | <p>CW 3 (in particular LGS Area A)</p> <p>CW 4</p> <p>NLB 1</p> <p>HTA 3</p> <p>HCA 2</p> <p>HCA 3</p> | <p><b>Policy: CW3. Local Green Space.</b></p> <p><b>Local Green Space Area A:</b> SW5430429382. (Churchway Field) and SW544429309 (Trebarvah 'Townplace' farmyard)</p> <p>I absolutely agree that this field and the old 'townplace' farmyard of Trebarvah should remain un-developed in perpetuity for the benefit of the many people who benefit from the use of the PROWs through this area.</p> <p>My husband and I have direct experience of 2 episodes of severe flooding within last 10 years from the field SW5430429382 when it was mismanaged. It is a very steep hill and any development would make this more likely (as rainfall would not be so easily absorbed into the soil) given that global warming appears to be causing increased and heavy rainfall. Our house is 100 years old, mostly wooden and has no foundations. Heavy downpours are a constant worry to us already.</p> <p><b>Policy: CW4. Principle Residency.</b> I strongly feel that the village is in imminent danger of becoming a playground for people with expensive holiday homes. It seems that as older residents pass away, their houses are being knocked down/developed and snapped up by people with deep pockets from out of county and the whole dynamic of the community is being changed, sometimes without reference to how the established community may feel. I would like to point out that there are also new residents who have made their homes here who have integrated into parish life and have had a much lighter and more sensitive touch, and have become valued members of the community.</p> | <p><u>To Note:</u></p> <p>Support for the way in which the NDP is presented and level of information / research presented in it.</p> <p>Support for all areas identified in Local Green Space Policy CW3, in particular Area A.</p> <p>Support for Principle Residency policy CW4 and importance of maintaining vibrant local communities.</p> <p>Links between CW4 and HTA3 in terms of the impact which holiday-let /second home property is having on house prices and consequently the ability of young people to buy housing.</p> <p>NLB1: Importance of conserving Biodiversity and the potential for the Parish to actively support owners of LGS land to achieve this. For example, through funding for relevant initiatives /projects.</p> |

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|     |                    | <p><b>Policy: HTA3: Affordable Housing.</b> Many of our young families struggle to afford somewhere to live in the parish. The increase of holiday homes and people buying up several properties for themselves is compounding this problem. I feel that there should be a more robust system that balances the needs of local residents who live and work here all year round and those who own properties which they use as a business or holiday home for themselves.</p> <p><b>Policy: NLB1 and HCA2 and HCA3: Biodiversity significance of LGS area A:</b></p> <p>In reference to the above mentioned field and the mine dumps which are on it, my husband and I are keen wildlife watchers. We are particularly aware of the various insects that use these areas to feed and breed. This year for example, the farmer kindly left all the nettles and thistles to grow and we have had a fantastic resurgence in tortoiseshell and red admiral butterflies. We regularly notice swallows feeding on insects, and we have regular visits from peregrine, buzzard, kestrel and sparrowhawk which is an indicator that smaller mammal and bird populations can support these top predators. Any development of this field could prove a disaster for the local wildlife and I would go as far as to suggest that the field should be, if at all possible, kept as a protected wildlife corridor along with the neighbouring small field that the Church way path goes through towards Perranuthnoe.</p> <p>Is there a way that the owners of the field can be compensated for this? There needs to be a balance between the needs of the individual and that of the community and the wildlife as a whole.</p> <p>The Neighbourhood Plan has been well thought out, researched and presented and I am very keen for it to become the first referral point for the parish as a whole moving forward.</p> |   |
| Yes | General Support    | I have read this plan and support it  |   |
| Yes | Strong Support for | I think this is an excellent plan that cover all the important aspects about what make the Parish so special and how it should be managed going forward I am in particular agreement  | <u>To Note:</u> Strong support for the Plan and confirmation that it reflects the key issues of importance to the Parish. |

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|                                      | <p>overall Plan</p> <p>Particularly Policies:</p> <p>CW 2,<br/>CW 3<br/>CW 4,<br/>CW 5,<br/>HTA 1,<br/>HTA 2,<br/>HTA 3,<br/>HTA 4,<br/>BDL 1,<br/>NLB 1,<br/>NLB 2,<br/>NLB 4,<br/>NLB 5,<br/>HCA 2,<br/>EB 1,<br/>EB 2,<br/>EB 3,<br/>EB 4</p> | <p>with policies CW2, CW3, CW4, CW5, HTA 1, HTA 2, HTA 3, HTA 4, BDL1 , NLB1. NLB2, NLB4, NLB5, NLB6, HCA2, EB1, EB2, EB3, EB4 I am in strong support of this plan.</p>                                      | <p>NLB 6 'Environmental Responsibility in Development has been renumbered NLB 5 in final draft NP formally submitted to CC.</p>   |
| <p>Non - resident property owner</p> | <p>Strong Support for overall Plan</p> <p>Highlights importance of:</p> <p>AONB related policies</p> <p>Natural Landscape &amp; Heritage conservation Policies</p>   | <p>Strongly support the broad thrust of the plan to improve the quality of new development in the area and to protect/enhance the AONB, landscape character and heritage assets including their settings</p> | <p><u>To Note:</u> Strong support for policies protecting AONB landscape character and Heritage assets.</p> <p>This would include: CW 2, CW 5, HTA 2, HTA 4, BDL 1 , NLB 1, NLB 1, NLB 2, NLB 3, NLB 4, HCA 1 , HCA 2, HCA 3, EB 3 and EB 4</p> |

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| Yes | Support for overall Plan  | <p>Just a short note to say that I <b>fully support the Parish Plan</b>, it seems to have been fairly and accurately evaluated and executed with the parish residents needs in mind.</p> <p>I think more publicity surrounding the consultation period would have been an advantage and feel that like me many residents may have missed the deadline due to not knowing about it.</p>   | <p><u>To Note:</u> The Parish subsequently extended the Reg 14 consultation deadline by a couple of months and increased publicity. Extensive feedback was received from across the Parish during this extended consultation period.</p>   |
| Yes | <p>Support for overall Plan</p> <p>Highlights importance of:</p> <p>CW 2</p> <p>CW 3 in particular</p> <p>LGS Area A</p> <p>CW 4</p> <p>HTA 2</p> | <p><b>Policy CW2 Safeguard Public Rights of Way and CW3 Local Green Space</b></p> <p>Proposed Local Green Space grid reference: SW5430429382 and SW544429309</p> <p>Important to keep these areas free from development. This field in particular is subject to extreme flooding problems. It is also a superb source for insect life and important for small mammals.</p> <p><b>Policy CW4 Principle Residency and HTA2 Replacement Buildings and Conversions</b></p> <p>I bring these two together as there are local applications at this time which clearly do not follow these requirements</p> <p>Essentially, I agree with the entire draft Neighbourhood Plan</p>  | <p><u>To Note:</u> Support for overall NDP. The need for protection of Local Green Space in particular Area A, and for the importance of Local Green Space designation where PROW pass through or near these areas.</p>  |
| Yes | <p>CW 5</p> <p>NLB 5 (note now renumbered NLB4)</p> <p>HTA 4</p>  | <p><b>Policy CW5 (page 59) Safe Access, Parking and Congestion</b></p> <p>The traffic needs to be slowed right down. A new car park above Perranuthnoe village would be sensible, but pedestrians would need safe access to the beach and the Cabin.</p> <p><b>Policy NLB5 (page 127) Cornish Hedges and Hedgerows</b></p> <p>New Hedges and Trees should be planted to soften the overflow car park in Perranuthnoe. Also the field used by the Cabin if their parking is going to be longterm. Tamarisk is very suitable, don't allow any more to be cut down. It is an AONB.</p> <p><b>Policy HTA4 (page 78) Caravans and other forms of moveable accommodation</b></p> | <p><u>To Note:</u></p> <p>CW5: The Parish has been advised that the NDP cannot provide any more specific guidance / actions to address speeding and parking problems, which are outside the remit of the planning system to address. However, the respondent's recommendations for Parish Council level action have been noted.</p> <p>NLB 5: The NDP policies cannot provide detail on specific actions such as where tree planning should be prioritised. This would need to be developed subsequently in an NDP Action Plan, in partnership with local landowners. However, the respondent's recommendations have been noted and will be considered for action.</p> |

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|     |  | Don't allow any caravans parked in fields apart from official site. How does Boat Cove Lane get away with it?   | The need to address the issues of caravans left full time in fields in the AONB, and the lack of enforcement, is recognised as a priority issue for the Parish. Policy HTA4 provides guidance on how national regs should be applied at Parish level, however it is recognised that there is a need for more effective implementation of these policies.  |
| Yes | Support for overall Plan<br><br>Highlights importance of:<br><br>HTA 3 | <p>I have read the draft proposal for Perranuthnoe Parish Neighbourhood plan and overall I agree with everything that has been put forward.</p> <p>I would like to ask you to look at housing for our young people who live in the village with parents or grandparents, in particular those who are disadvantaged by mental health or disabilities.</p> <p>This group need to be close to their family for support.</p> <p>A single person is not eligible for a 2 bedroom house if they are on the Cornwall Home Choice register. We need to look at new builds with this in mind. All one bedroom properties are generally only available to people over 55.</p> <p>Would it be possible to find out how many single people in Perranuthnoe are looking for accommodation in Perranuthnoe.</p> <p>Private renting is not an option for someone who is disadvantaged by mental health and moving out of an area they have lived in since they were born and attended the village school is not a possibility.</p> <p>The network of support in the village is what they are used to and able to rely on.</p> <p>To sum this up.</p> <p>Please can we consider all the young people in the village who are looking to find a home of their own, especially the young people who need more support to become sustainable and move forward in a home of their own.</p> | <p><u>To Note:</u> The importance of supporting housing for young people who live in the Parish with parents or grandparents, in particular those who are disadvantaged by mental health or other disabilities.</p> <p>Policy HTA 3 prioritises those who can demonstrate that they have a strong connection to the Parish. It is noted that within this policy a strong priority should be placed on providing homes for young people.</p> |
| Yes | Strong Support for   | I am very happy with the thrust of the plan and its intent to retain the character of this rural area. I fully support the feeling that there is no need for more building in the area. Red Lane and the  | <u>To Note:</u> In implementing the policies under Objective 4, the Parish will work with Cornwall Council to explore the potential   |

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|            | <p>overall Plan</p>                                | <p>surrounding areas will only retain their quiet, peaceful nature provided no further building occurs wiping out hedgerows, trees and habitats.</p> <p>I wish that this were a tree preservation area too as I am told that Cornwall has the fewest trees per square metre than any other county in the UK.</p> <p><b>I fully support the plan</b> – thank you to all involved for their hard work</p>  | <p>to increase the number of ‘tree preservation areas’ to include further areas in Red Lane.</p>  |
| <p>Yes</p> | <p>Support for overall Plan<br/>CW 5<br/>HTA 1</p> | <p>Whilst planning for a sustainable, community orientated future with selected planning approval and enhanced service provision... I believe that the initial focus should be on solving the problems that currently blight our part of the parish.</p> <p>Planning / Construction – The presence of the disgraceful carbuncle that is the 2 dwelling development next to the Courtlands Residential home along with the “agricultural” development further along the A394... are in danger of creating a culture of build first and spend the next 10 years “playing” the planning process.</p> <p>Road Safety – Whilst recent measures are welcomed... the stretch of the A394 from the junction with Dola Lane (which also has an outbound, busy bus stop) to the end of the 30 mph speed on the far side of the former West Country Classic Cars site... remains a fatality waiting to happen. This stretch of road now houses a speed advisory sign on each approach... which does have a positive impact... but only on the stretch of road between the 2 signs... for the stretches of road that make up the rest of the 30 mph zone, in both directions... the result has been a significant increase in the cases of “11<sup>th</sup> hour braking” – immediately before the speed alert signs, and rapid acceleration to 60 mph and beyond as soon as the end of the 30 mph zone comes into sight... well before the actual 30 mph zone ends and in areas containing junctions with limited visibility, retail outlets and bus stops... this is a serious accident waiting to happen and should be the focus of any S106 monies allocated to road safety in the parish.</p> | <p><u>To Note:</u></p> <p>The respondent highlights two priority issues that need addressing: development along the A394 and road safety. The NDP can only provide planning policy level guidance, it cannot provide guidance on specific developments (that has to be done through enforcement actions / planning applications); speeding is not a planning issue per se. However, the Parish recognises the importance of all the issues raised by the respondent, and is following up on them with Cornwall Council.</p> |

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| <p>Yes</p> | <p>HTA 1<br/>NLB 4<br/>EB 2<br/>DM 1</p>   | <p>My main issue is with granted planning for new houses being built on agricultural land and those selling off gardens for development. This has been extensively done on Perran Downs Lane close to Red Lane (an agricultural field, now houses) and on Red Lane itself - a whole rash of former gardens are now very large houses.</p> <p>Like many others, we fear the development of fields that lie between developments/houses - such as is happening in Rosudgeon on the Helston Road. This is the “Ribbon Development” that you claim to be against! Yet it is proliferating quickly.</p> <p>There appears to be no strict control over planning and further confirms the suspicion of a corrupt planning department or councillors in Planning taking backhanders, allowing these developments to proceed. Any Perran Parish Neighbourhood plan is not worth anything unless it can have teeth.</p> <p>I do fully support the idea of being a part of the Dark Skies initiative.</p> <p>With the loss off Post Offices in the Parish, Praa Sands and Rosudgeon, can any encouragement be made to the Post Office for a replacement?</p> | <p><u>To Note:</u></p> <p>The importance of NDP policy advice provided in:</p> <ul style="list-style-type: none"> <li>- HTA 1 in guarding against further development sprawl / ribbon development.</li> <li>- HTA 1 and EB2 in protecting agricultural land from development.</li> </ul> <p>However, the need to prevent overcrowding which may result through inappropriate infill development in gardens.</p> <ul style="list-style-type: none"> <li>-NLB 4 in preventing further light pollution.</li> </ul> <p>Concerns over lack of transparency in Planning decision-making. In relation to this the importance of the policy guidance provided in Policy DM1.</p> <p><u>Changes:</u> Strengthen policy guidance on infill development in gardens / overcrowding.</p> <p><u>For information:</u> A new Post Office has been provided in Rosudgeon.</p> |
| <p>Yes</p> | <p>Strong Support for overall Plan<br/><br/>Particularly Objectives 4 &amp; 5 and HTA1</p> | <p>I am in <b>full support of the Neighbourhood Plan.</b></p> <p>I feel that the Plan’s policies cover the planning issues which are important within this Parish.</p> <p>I feel that all of the issues and policies are important with specific emphasis on limiting the extent of further property development and development sprawl. This should ensure that the Parish is able to meet local housing needs whilst safeguarding the distinct identity of villages, hamlets and their communities.</p> <p><b>The Neighbourhood Plan’s policies cover the issues which I feel are important in this Parish</b> and to protect the places and resources which I feel need protecting. This must ensure</p>   | <p><u>To Note:</u> Confirmation that the Plan focuses on the issues of key importance to the Parish and that policies provide appropriate guidance.</p> <p>Comments emphasise the importance of: preventing further development sprawl and ensuring that local housing needs are met without compromising the identify of communities and settlements and the distinctive natural and historic character of Parish landscapes.</p>   |

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|     |  | Cornwall's enduring distinctiveness and maintain and enhance its distinctive natural and historic character.   |   |
| Yes | CW 1<br>CW 2,<br>CW 3<br>CW 4<br>HTA 3   | <p><b>I fully support the Plan.</b> The areas to which I could most contribute in an informed way would be<br/>CW 1, 2, 3 and 4<br/>HTA 3</p> <p>These are the areas which I could probably formulate the most informed supportive arguments.</p> <p>In particular, I would strongly support the active preservation of green spaces for children and other members of the community. This would include both public spaces (playground) and private (green spaces within a housing estate). Such spaces provide a critical focus for both social and physical activity, and as such can significantly help support the physical, mental and emotional well-being of both individuals and groups within any community. They promote social cohesion and interaction, while enabling individual activity. It is well known that green space and physical activity is a key part of mental and emotional wellbeing. I would also argue that they are key to enabling community interaction and as such become the core to the health of individual and group in a very holistic sense.</p> <p>I would also very strongly support any proposals being made to further the protection of affordable housing, and to promote local residency clauses.</p> | <p><u>To Note:</u> The consultee has offered to actively support implementation of the NDP in particular for:</p> <ul style="list-style-type: none"> <li>- Local Green Space;</li> <li>- Principle Residency and</li> <li>- Affordable Housing</li> </ul>   |
| Yes | Strong Support for Overall Plan<br><br>Highlights importance of:<br><br>BDL 1<br>HTA 1 | <p>Thank you for giving me the chance to review the Neighbourhood Development Plan for Perranuthnoe Parish.</p> <p>I have been resident in North Rd Goldsithney since 1990</p> <p>Whilst any document like this can get very complicated, I congratulate you on its presentation in covering the main aspects of life within Perranuthnoe PC.</p> <p>Re Policies BDL1 and HTA2:</p> <p>Like you I feel all planning applications should respect the AONB and WHS and when I view the photo on Page 41 (the</p>   | <p><u>To Note:</u> Confirmation that the NDP covers the main issues of concern.</p> <p>The respondent emphasises the importance of:</p> <ul style="list-style-type: none"> <li>- ensuring that development / building scale and design does not have a negative impact on Landscape or Settlement Character in AONB / WHS areas.</li> <li>- considering coastal erosion and protecting coastal footpaths</li> </ul> |



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|         | HTA 2<br>NLB 2<br>CW 2   | <p>one with the rainbow) the village of Perranuthnoe with the Church and view of St Michaels Mount has been spoilt with the very modern house developments. In contrast I feel the development at Daffodil Fields in Goldsithney is good with character-built houses fitting in to the established village.</p> <p>Re Policy NLB2 and CW2:</p> <p>Coastal erosion has also been considered and I fully understand that where it doesn't affect property it will not be considered as needing attention. I do feel though that there is a need to maintain the quality of the coastal footpaths as they are very popular and is another way of people staying fit.</p> <p>As a local resident intending to be so for the rest of our lives, thank you for the hard work that has gone into preparing this plan and let's hope the character of the area will not be affected by those in Government and further afield.</p>  |  |
| Yes     | Policy HCA 2             | <p>I'd like to say how <b>strongly I support policy HCA2</b></p> <p>It's so important to protect the heritage character of the places and features which lie in the AONB and areas of this Parish enjoyed by residents and visitors alike. They need protection so that future generations can continue to enjoy them and in doing so learn about the history of the Parish. The protection which I haven't seen much of from Cornwall Planning Department in recent years.</p> <p>I'd like to say that an important asset seems to have been missed however, this being the Coffin Trail from Perranuthnoe Church to Marazion. Church Way has importantly been added as Asset 5, so I'd suggest the Coffin Trail be added as Asset 6 with wording similar to Asset 5, and with emphasis on the particular features of historical importance on these paths, for instance the granite stiles are of particular relevance in that they were built to accommodate the coffin and its bearers.</p> | <p><u>To Note:</u> Strong support for protection of heritage assets and character in the AONB (Policy HCA2)</p> <p><u>Changes:</u> Include the Coffin Trail in Policy HCA 2 as a heritage asset of significance to local communities. It was omitted in error. Make reference to the value of historic features like the old granite coffin styles on Church Way and the Coffin Trail.</p> |
| Yes x 2 | Support for Overall Plan | <p>As new residents of the parish we are entirely new to this Plan and its production. It has taken a little while to assimilate and has been a learning process; we therefore appreciate the extension to the consultation period.</p>   | <p><u>To Note:</u> Support for overall Plan and in particular:</p> <p>- protection of Local Green Space Policy / areas in particular Area F.</p>   |

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|         | <p>Highlights importance of:<br/>CW 3 in particular<br/>LGS Area F<br/>HTA 1</p> | <p>In general, we are very impressed and pleased with the plan and commend those who have clearly taken great pains in its production. We hope it will be a useful touchstone to facilitate responsible and sustainable development that preserves that unique sense of place in this beautiful part of Cornwall.</p> <p>More specifically we are particularly pleased to see the designation of Green Spaces and in particular that listed "F". <b>(Policy CW3)</b>.</p> <p>We are pleased to see designated Development Boundaries. We just hope that they can be enforced. We note the recent development outside the boundary in Daffodil Fields as an exception. <b>(Policy HTA1)</b></p> <p>We are however surprised that there is no mention of the possibility of Neighbourhood Development Orders or Community Right to Build Orders. Perhaps these have been considered during the consultation discussions and omitted for good reason.</p> <p>So, in summary, thank you for the Plan and the opportunity to comment on it. We approve.</p> | <p>- Development Boundaries identified in HTA 1.</p> <p>Concern over whether planning decisions will in practice abide by identified Development Boundaries.</p> <p>Answer: It is hoped that policy DM1 will help to ensure that the NDP is actually used / adhered to.</p> <p><u>To Check:</u> Whether specific guidance should be provided on Neighbourhood Development Orders or Community Right to Build Orders within NDP policies?</p> <p><u>Answer:</u> This was discussed. It was felt that there is not a need for specific Parish level policy guidance on Neighbourhood Development Orders or Community Right to Build Orders because the existing policies in the NDP will support effective implementation of national level guidance at the local level.</p> |
| Yes x 2 | <p>Highlights importance of: CW 3 in particular<br/>LGS Area L</p>               | <p>The protection of the 'Green' in the St Petry housing estate is hugely important to all the residents.</p> <p>The protection of the open space, free from houses being built on means that children can freely and safely play, the residents can enjoy the view, and nature can enjoy the space too. It does not need to be built on any more than it already has been.</p> <p>Especially during these difficult times, we must come together and enjoy and appreciate what we have. Thank you.</p>  | <p><u>To Note:</u> Importance of Local Green Space Area L, The Green' in the St Petry housing estate.</p>  |
| Yes     | <p>CW 5a<br/>HTA 3</p>   | <p>We need to look at homes for singles and couples who have strong connections to the village. When people need caring due to age or disability a strong family network is important. If</p>  | <p><u>To Note:</u><br/>Concerns over the impact of any further development within Goldsithney village in exacerbating traffic through the village.</p>   |

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|     |  | <p>more families were able to live closer it would reduce the strain and cost to other agencies as they will care for each other.</p> <p>Goldsithney Planning: I do not agree with any planning inside the village boundaries. But agree to planning behind the community centre as this will not affect the traffic through the village.</p>   | <p>Response: The Parish recognises the pressure traffic is placing on Goldsithney village and issues associated with it. It is hoped that the Goldsithney Development Boundary and designation of Goldsithney village centre as a Conservation Area will limit further development in this area.</p> <p>The importance of prioritising homes for those with strong connections to the village:</p> <p>Response: Policy HTA 3 places a strong priority on the provision of housing provision for those who 'have a direct family commitment in, the Parish'</p>  |
| Yes | <p>Support for Overall Plan</p> <p>Highlights importance of:</p> <p>CW 3</p> <p>HTA 1</p> <p>NLB 4</p> <p>EB 1</p> | <p>I am writing in support of the draft neighbourhood plan and in particular the following policies</p> <p>I strongly support the policy to give special protection to <b>local green spaces</b> which either have an official amenity or are areas of open space or landscape that residents particularly value. This is particularly important on the edges of settlements such as Goldsithney and Perran Downs where there is real danger of coalescence with threats from developments.</p> <p>I strongly support the establishment of <b>development boundaries</b> around the 4 main settlements to protect open countryside and in recognition that for the period of the plan (up to 2030) the Parish has more than met its market housing requirement and there is no need or value to the parish in further development of any significance.</p> <p>I am aware of the proposals made by developers to include areas within the development boundaries and believe these should be resisted as the housing is not needed and would involve development in open countryside and encourage coalescence.</p> <p>I strongly support more protection for <b>Cornish Hedges</b> which are a haven for wildlife as well as playing a large part in supporting the character of the landscape. I also believe that Cornish Hedges should be the default boundary treatment in the Parish where new development occurs and close boarded fencing should be resisted as it does not encourage wildlife</p> | <p><u>To Note:</u></p> <p>Strong support for:</p> <ul style="list-style-type: none"> <li>- Local Green Space Policy and in particular areas used for amenity, or with open space or landscape character that residents particularly value.</li> <li>- Development Boundaries proposed around the four main settlements.</li> </ul> <p>And opposition to the specific requests made by developers / landowners as part of this Reg 14 consultation to include their land within development boundaries. (ref Reg 14 landowners consultation response table)</p> <ul style="list-style-type: none"> <li>- encourage small workshop provision similar to those provided at Nanturras as development that has community benefit but low impact on the neighbourhood</li> <li>- Support for better protection for Cornish Hedges (Policy NL5. <u>Changes:</u> the need to look at whether additional guidance should be provided in the NDP on fencing, where it would harm the character of the AONB or WHS.</li> </ul> |

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|         |   | <p>and is visually unattractive, harming the character of the area covered by the AONB and WHS.</p> <p><b>EB1:</b> I support the policy as it stands but believe that if at all possible small workshop provision should be encouraged where it can be sustainably developed or extended. The current workshops at Nanturras, small in scale, employ local people, are low impact on the neighbourhood are good examples of what can be encouraged without generating significant traffic.</p>   |  |
| Yes     | <p>HTA 1</p> <p>Page 67</p> <p>Figure 26</p>                                      | <p><b>I fully support the draft Plan.</b></p> <p>I refer to Page 67, Figure 26 (Rosudgeon Development Boundary)</p> <p>I would sincerely hope that any application for further development in or adjacent to Trevean Way is refused as it is outside the area outlined in red, including any change of use.</p>  | <p><u>To Note:</u></p> <p>Support for Rosudgeon Development Boundary and importance of resisting further encroachment of development out from Trevean Way.</p>   |
| Yes x 2 | <p>Support for all NDP Policies</p> <p>Highlights importance of: DM 1</p>         | <p>We agree with all of the Policies in the draft Neighbourhood Plan especially important is <b>Policy DM1 Neighbourhood Plan</b> Implementation and Monitoring. Thank You</p>   | <p><u>To Note:</u></p> <p>Importance of Policy DM1 in providing guidance and a requirement for effective use and monitoring of the NDP</p>   |
| Yes     | <p>CW 3</p> <p>CW 5</p> <p>HTA 1</p> <p>Objective 5</p> <p>HCA 1</p> <p>HCA 2</p> | <p>I have studied the Neighbourhood Development Plan and congratulate those who have put it together for the benefit of us all.</p> <p>I agree that the boundaries put forward are acceptable and hope that they will be approved.</p> <p>We are lucky to have green spaces and heritage sites and I feel it is important to preserve these for ourselves and for the future.</p> <p>I chatted with people running the meeting on Saturday 31<sup>st</sup> and we talked about the traffic problems in Goldsithney. I understand that this is something being discussed and I look</p> | <p><u>To Note:</u></p> <p>Support for overall Plan and in particular</p> <ul style="list-style-type: none"> <li>- Development Boundaries identified in HTA 1</li> <li>- Local Green Space areas identified in CW3</li> <li>- Concern over traffic problems in Goldsithney and the need to address these and ensure that development does not exacerbate traffic pressure.</li> </ul> |

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|        |                                | forward to the result. I can't see a solution but I hope someone can see a way to ease the pressure.  |   |
| Yes x2 | CW 3<br>CW 5                   | Support Policy <b>CW3: Local Green Spaces</b> .<br>We feel the present development density should be maintained in Perran Downs as this gives it its character. Infill development in the large gardens should not be allowed.  | <u>To Note:</u> Support for protection of identified local green spaces.<br>Need to maintain current building density in Perran Downs.<br><u>Changes:</u><br>Add further clarity in Policy CW5 & BDL 1 on the need to avoid 'overcrowding' / dense infill, in particular where it affects the character of a settlement.  |
| Yes    | Support for Overall Objectives | Overall Good Objectives<br>However, Concerns Over Following Items<br>CW1: What are Long term Welfare Needs<br>CW4: How are Local Residents Checked<br>CW5: Parking pressures must consider safety over need<br>HTA1: Development Sprawl must be resisted<br>NLB1: Protect Ecosystems – Signs?<br>NLB3: Bare Spoil Heaps are not attractive<br>NLB5: Important to stress to Developers<br>EB2: Important Summary<br>DM1: Monitoring Process to be firmed up<br><br><u>Personal Concerns</u><br>Lack of Protected Green / Farming Areas Outside and Adjacent to Development Boundary. Look at the classic case surrounding Rosudgeon<br><br><u>Suggestions</u><br>A footpath from St Aubyns Estate up B3200 to the roundabout on A394. A branch from the existing footpath adjacent to 'Coagreath' across to St Pirans Hall Goldsithney<br><br>Consideration for a car park to keep vehicles off B3280 in Goldsithney | <u>To Note:</u><br>Most of the queries / issues raised relate to implementation of the Plan and it will be important for the Parish Council to ensure that adequate mechanisms are in place to address these issues. For example, monitoring of whether principle residency conditions are being met (Council Tax receipts etc); prioritising safety in regards to parking pressures; working with relevant agencies to monitor impact on ecosystems; ensuring developers are aware of the need to conserve Cornish Hedges and biodiversity; establishing NDP monitoring systems etc.<br><br>Whilst not part of the NDP the Parish Council have been working with Cornwall Council to facilitate a footpath from St Aubyns Estate to the roundabout on a A394 |

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| Yes | Objective 6   | <p>The Neighbourhood Plan provides appropriate planning guidance for this Parish and covers the planning issues that are most important here.</p> <p>Glad Objective 6 is in the Plan. Rural businesses need support. SMEs keep villages going.</p>  | <p><u>To Note:</u></p> <p>Confirmation that the Plan covers the priority issues for the Parish and provides appropriate policy guidance.</p> <p>The importance of Objective 6 in supporting SMEs</p>  |
| Yes | <p>Highlights importance of:</p> <p>CW 3</p> <p>CW 5</p> <p>HTA 1</p> <p>HTA 2</p> <p>HTA 3</p> <p>BDL 1</p> <p>NLB 5 (note now renumbered NLB 4)</p> <p>DM 1</p> | <p><b>CW3</b> I feel it is very important to identify and protect green spaces within the parish, they are well used by locals-adults and children and need protecting from building which would have an adverse effect on the locale.</p> <p><b>CW5</b> There is a need to keep development sites on a small scale to maintain the village aesthetic. Traffic congestion and parking problems already exist in Goldsithney and Perranuthnoe.</p> <p><b>HTA1</b> There is a definite need for development boundaries as recent housing has already encroached upon green spaces (eg fields in Rosudgeon) and open countryside (eg housing development creeping along Gears Lane).</p> <p><b>HTA2</b> Size of buildings and use of materials in keeping with local character are an important consideration, along with maintaining Cornish hedges which are a big feature of the parish.</p> <p><b>HTA3</b> This is an important issue, much needed to provide housing for young local people.</p> <p><b>BDL1</b> As with HTA2 there is a need to maintain the local character of the area by setting standards for building and landscaping.</p> <p><b>NBL5</b> Cornish hedges and hedgerows are integral to the area giving a natural beauty, a haven for wildlife and helping to reduce flooding and erosion.</p> <p><b>DM1</b> This is important as it will ensure that clear and transparent decision making will occur in the best interests of the development of the parish</p> | <p><u>To Note:</u></p> <p>Highlights the importance of:</p> <ul style="list-style-type: none"> <li>- protecting Local Green Space, all areas in CW3</li> <li>- assessing spatial planning and cumulative impact (policy CW5) in planning decision-making to prevent over-crowding and to ensure that current problems of traffic congestion aren't exacerbated.</li> <li>- support for Development Boundaries that have been identified</li> <li>- ensuring building design and scale is in keeping with local character (HTA 2 and BDL 1)</li> <li>- housing provision for young people within HTA 2</li> <li>- protection of Cornish Hedges</li> <li>- effective implementation of the NDP / transparency in decision-making.</li> </ul> <p><u>Changes:</u></p> <p>Add further clarity in Policy CW5 &amp; BDL 1 on the need to avoid congestion.</p> |
| Yes | CW 3  | <p>The Neighbourhood Plan covers the planning issues which I feel are most important here.</p>  | <p><u>To Note:</u> Confirmation that the Plan covers the priority issues for the Parish and provides appropriate policy guidance.</p>   |

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|         |   | The issues and policy that I feel is most important is the one on Green Spaces  | Importance of Green Spaces policy and support for areas identified.   |
| Yes x 2 | CW 3<br>CW 4<br>CW 5<br>NLB 1<br>NLB 3<br>NLB 4<br>DM 1 | <p><b>The Neighbourhood Plan is excellent and very professionally presented, addressing the key problems facing the Parish.</b></p> <p>It is good to see policies addressing key issues such as overbearing properties, light pollution, lack of parking and increasing number of holiday lets (NLB4, CW5, CW4)</p> <p><b>Policy CW3: Local Green Spaces</b></p> <p>Agree with Green Spaces designated in Figure 20. Why hasn't the Habitat Action Plan Woodland in Peran Downs Figures 3 and 31 been included as a Green Space. It is one of the last woodland areas providing biodiversity and carbon capture. If developed and therefore more trees felled the tree canopy is reduced. The remaining trees will not have developed root systems to survive the extra exposure to strong winds. Thus more trees are lost, as is already happening.</p> <p><b>Policy NLB 1 Areas of Biodiversity Significance</b></p> <p>Can find no definition of Habitat Action Plan woodland (Figure 31). Consequently what is the Action Plan?</p> <p>Will this NDP avoid Parish Council planning decisions being overridden by Cornwall County Council?</p> | <p><u>To Note:</u></p> <p>Confirmation that the Plan covers the priority issues for the Parish and provides appropriate policy guidance.</p> <p>Support for structure and content of Plan</p> <p>Highlights key issues of importance as:</p> <ul style="list-style-type: none"> <li>- overbearing properties, light pollution, lack of parking and increasing number of holiday lets (NLB4, CW5,CW4)</li> <li>- Protection of Local Green Space (CW3)</li> <li>- Conservation of biodiversity (NLB3)</li> <li>- The need to ensure CC Planning Dept actually abide by NDP policies (DM1)</li> </ul> <p><u>Answers to queries raised:</u></p> <p>'The reason why the Trevelyan Plantation (Habitat Acton Plan Woodland) hasn't been included as Local Green Space is because it is already covered by designations as a Tree Protection zone and as a Habitat Action Plan area.</p> <p>The Parish fully recognises its importance as one of the last woodland areas in the Parish and that it is extremely important to protect biodiversity in this area and to prevent further tree felling. The existing TPO and Habitat Action Plan designations should provide this protection, and it is important that planning and enforcement decisions and actions abide by the regs associated with those designations.</p> <p>A Habitat Action Plan woodland is an area that has been identified as a priority conservation area within the UK's biodiversity action plan (BAP), in recognition of the biodiversity significance of it. BAP is an internationally recognized program linked to the CBD &amp; Aichi Targets.</p> <p>Cornwall Council has a duty to conserve UK BAP priority habitats and species under Section 74 of the CRoW Act</p> |

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|         |  |   | (2000). This specifies that adverse impacts on BAP habitats and species must be avoided wherever possible. If adverse impacts are not avoidable, they must be conserved and protected through mitigation, compensation and enhancement measures.'   |
| Yes x 2 | HTA 1  | I confirm that both my wife and I are very supportive of the Parish Council's proposed development boundary for Perran Downs and Rosudgeon. It is important that the open area of agricultural countryside along Perran Downs Lane and Well Lane remains so without any further development. The agricultural area East of Rose Cottage, must and should, remain an agricultural area void of any further development. There is a small existing residential development on the North side of Well Lane which is a natural boundary and should not be built up on both sides. Well Lane is a well used bridleway and is a natural end to development which has been recognised by the Planning Inspector when he refused to support previous attempts to build in the area. | <p><u>To Note:</u></p> <p>Strong support for Perran Downs and Rosudgeon Development Boundary.</p> <p>In response to the Open Day held by the Parish to discuss the specific proposals by land owners to make changes to Development Boundaries: This consultee is of the strong opinion that the agricultural area to the east of Rose Cottage should remain outside the Perran Downs Development Boundary, and should remain as agricultural land, in line with the Planning Inspector's decision.</p> |
| Yes x 2 | HTA 1  | Land off Well Land and Perran Downs Lane: It has been brought to our attention that there is a request for this land to be scheduled for development in the local plan. This is surprising since three planning applications on the land have been turned down. It was clearly established that the existing green break between Perran Downs and Rosudgeon should be maintained.   | In response to the Open Day held by the Parish to discuss the specific proposals by land owners to make changes to Development Boundaries: This consultee is of the opinion that the agricultural area to the east of Rose Cottage should remain outside the Perran Downs Development Boundary, and should remain as a green break between Perran Downs and Rosudgeon   |
| Yes     | Overall Support for the Plan<br>Highlights importance of:<br>CW 2<br>CW 5<br>HTA 1 | <p>Thank you for your hard work constructing the neighbourhood plan.</p> <p>As the main priority, I particularly value the focus on our amazing countryside, footpaths, the views within the parish and the coast path. We love spending time outside in the parish and would consider anything which impacts adversely on this as detrimental. Coastal erosion isn't an easy or cheap problem to resolve but, in my opinion, a worthy target for our spending.</p> <p>I also value the limitations that you are suggesting to curb "development sprawl" and caravan "dwellings" – I'm sure every</p>   | <p><u>To Note:</u></p> <p>Support for overall Plan and in particular:</p> <ul style="list-style-type: none"> <li>- Objective 4: protection of Natural Landscapes and Biodiversity</li> <li>- HTA 1: Development Boundaries and preventing 'development sprawl</li> <li>HTA 4: need to control caravan 'dwellings'</li> <li>- EB2 support for sustainable farming</li> </ul>   |



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|            | <p>HTA 4<br/>Objective 4<br/>all policies<br/>NLB 1<br/>NLB 2<br/>NLB 3<br/>NLB 4<br/>NLB 5<br/>EB 2<br/>EB 3<br/>EB 4</p> | <p>parish will say the same thing but it does feel as though we've contributed our share of housing.</p> <p>Farming and the skills that farmers have in terms of land maintenance are often undervalued and I thank you for recognising this. Development of equestrian sites and campsites are all very well but should be limited where they take over existing farmland.</p> <p>I note that transport/parking is not discussed (I presume it's not a parish responsibility) but I wonder if the parish has any sway to relatively encourage environmentally friendly methods of navigating through the parish and discouraging the more polluting alternatives.</p> <p>Thank you again for the plan and for consulting regarding it.</p>  | <p>- EB3: Need to manage impact of campsites on farmland / landscapes</p> <p>- EB4: Need to manage impact of equestrian sites on farmland / landscapes</p> <p><u>Response to query:</u></p> <p>Policy CW5 provides policy guidance on the need to consider parking and traffic pressure.</p> <p>Policy NLB6 (numbering changed in final draft NP submitted to CC) promotes environmental responsibility.</p> <p><u>Changes:</u> This policy can be strengthened to include consideration of patterns of development that encourage environmentally friendly transport</p> |
| <p>Yes</p> | <p>CW 1<br/>CW 3 in particular<br/>LGS Areas F,G,J and K<br/>HCA 3<br/>NLB 3</p>   | <p>I think the plan is a good proposal to protect the green space within the Goldsithney Community.</p> <p>The proposal is protecting green space in or on the edges of the community of Goldsithney. In particular, the proposed greenspace F is bordering the ancient part of Gears Lane within the boundaries of the world heritage site that leads to the old mining facility. It is full of wildlife including rabbits and birds, including birds of prey for which there is an abundant source of food. This is also an area that is in constant use by children on their bikes, walkers and horse riders from the large stables that the lane leads too. This also borders greenspace from the neighbouring Marazion council and is a central part of community life within the village and is part of what gives the village a sense of community. Similarly, the area depicted as J allows for a break and natural greenspace bordering the St Hilary council greenspace.</p> <p>The areas designated K &amp; G allow for the recreational element for the village. In particular, they allow for recreational activities for young and old within the village.</p> | <p><u>To Note</u></p> <p>Strong support for overall Neighbourhood Plan</p> <p>Strong support for LGS areas F,G,J and K and importance of these areas for community health and well-being, recreation and wildlife.</p> <p>Importance of history and heritage of Goldsithney village</p>   |

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|         |  | I wholeheartedly support the plan in helping to enable a continued sense of community and protecting wildlife, the history and heritage of the village as well as maintaining the distinct boundaries between local parishes.   |   |
| Yes     | CW 3 in particular<br>LGS Area F<br><br>HTA 1<br>NLB 4<br>HCA 1<br>HCA 3<br>EB 2 | <p>It is rare now to find a rural area unspoiled by modern development. Many people have childhood memories of playing in the fields near their home and in most cases those fields have now been built on.</p> <p>We are fortunate to have the land between Tregurtha and Goldsithney, including the lane linking the two with very little modern development. At the Tregurtha end there are historic buildings linked to mining heritage. At the Goldsithney end there are miner's cottages mentioned in "Twenty years at St Hilary" by the vicar of St Hilary. Bernard Walk mentions visiting those cottages in the 1918 Flu Epidemic where miner's families were ill with the flu.</p> <p>It is a historic mining landscape and part of the World Heritage Site and as a keen walker this is one of my favourite and regular walks because not only can you see the Mine chimneys but in the distance, you can see over the hills for miles. It is really special to go for a walk and be surrounded by nature and the traditional rural and agricultural scenes without noisy traffic. The things that come to mind are horses coming up and down the lane, tractors in the fields, daffodil pickers and, of course, the horses in the fields.</p> <p>The hedges in the lane and in the field, have blackberries, sloe berries and elderflowers for making elderflower cordial.</p> <p>In conclusion I would say that it is a really special area for horse riders, walkers and families with children. In the 15 years I have been in the area I have used the lane regularly and really appreciate its tranquillity and natural beauty. I strongly support the proposal to give the area additional protection.</p> | <p><u>To Note</u></p> <p>Concern over impact of development on rural area and access to green space.</p> <p>Strong support for LGS area F</p> <p>Importance of historic buildings, mining heritage and historic landscape</p> |
| Yes x 4 | CW 3<br>CW 5   | I want to add mine and my families full support behind this statement to enshrined the green spaces of our shared   | <u>To Note</u>  |

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|     | NLB 1<br>NLB 4  | <p>community for future generations. We must recognise that the green fertility lands that separates homestead boundaries is actually the thing that units us by providing glimpses of our nature. We are all too much surviving outside the rhythms of a natural world. Our need, opportunities and desire to interact with the rest of nature have dramatically decreased. This has left us and our children with 'nature deficit disorder' which refers the effect it has on our physical and emotional health. These areas the parish deems to protect seem small in the grand scheme or the Cornish landscape but stand large for its community wellbeing and allows our communities to continue by delivering unbeknownst to it and many of us the resources of wellness. By losing such natural spaces, we lose our relationship with nature which desensitise us to a point where that connection would have little value. 'What is the extinction of the condor to a child who's never known a wren.</p> <p>The wanted destruction of such precious nature should be held in perpetual abatement and instead held in a sacred and legal bond for our future communities. We must remember that we do not inherit the earth from our ancestors, we borrow it from our children.</p> | <p>Strong support for all LGS areas and importance of green infrastructure and natural environment.</p>   |
| Yes | CW 3 LGS Areas F,I,J and H<br>CW 5<br>HTA 1<br>NLB 1<br>NLB 4<br>HCA 1<br>HCA 3<br>EB 2 | <p>Much effort has gone into our Parish Plan, many weeks of hard work, engaging with residents about their wishes and worries for the future shape of our community.</p> <p>I feel that the plan is a massive success, not only protecting areas where protection is required but also earmarking areas for development to support housing needs.</p> <p>I would like to <b>formerly state my support for the current Plan</b> and fear without it in place our neighbourhoods would be at risk of being permanently disfigured by greedy developers developing green spaces forever, destroying the very spaces that give our Parish its charming character and rural feel.</p> <p>In particular, I feel that the distinctive small hamlets surrounding Goldsithney are at particular risk of being merged into Goldsithney and losing their unique identity forever.</p>  | <p><u>To Note</u></p> <p>Strong overall support for the Plan</p> <p>Concern over ongoing development creep / sprawl and importance of settlement boundaries</p> <p>Importance of distinctiveness of small hamlets</p> <p>Importance of green infrastructure</p> <p>Strong support for LGS areas F,I,J,H</p> |

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|     |      | <p>The areas which I feel are most risk:</p> <p>Nanturras - This area between Goldsithney and Perran Downs offers a very special corridor of Greenery between these two distinct settlements, with a wide variety of wildlife and mature trees and small meadows.</p> <p>Daffodil Field to St Hilary - Having been recently developed the remaining field East of the new houses and the entire valley offer an important buffer between Goldsithney and St Hilary. This green space should be preserved to ensure the settlements retain their own identity and continue to provide vital habitat for wildlife and offering views across the fields</p> <p>Goldsithney - Plain - an - Gwarry, Tregurtha: With recent aggressive development of land at Gears Lane, this area is already losing its rural charm and "Lane" identity, fast becoming a busy road and the historical look of Gears Lane which has attracted many families over many years fast being eroded at the same time continued building along the lane takes away green spaces that attracted our ancestors to the area in the first place. The approach to the historic mining area around Tregurtha via Gears Lane has changed more in the last 5 years that at any time before, the views of open countryside and small meadows are a major part of this World Heritage Site. Every green space lost is lost for future generations to enjoy.</p> <p>Unless our Parish Plan is adhered to future generations face an urban sprawl all the way from St Hilary to Plain an Gwarry and Goldsithney to Rosudgeon with no green belt between each area, once green space is developed there is no going back so it's protection is key to preserve our community for future generations and importantly to retain habitat for local wildlife which live around us.</p> |                |
| Yes | CW 3 | As a family of several generations that has grown up in Goldsithney, we support the plan to keep green areas and stop the surrounding areas from being spoiled.   | <u>To Note</u> |

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|         | NLB 4   |  | Concern over development impact on green areas surrounding Goldsithney and support for conservation of green space.  |
| Yes x 2 | CW 3  | <p>We wish to strongly express our support for the green spaces as detailed in the PC draft development plan. They not only provide areas with open outlooks across the countryside, but also provide vital habitats for a wide list of creatures, seen and unseen. Any development on these areas represents threatens those habitats.</p> <p>As a further point two of the areas are of historical significance.</p>   | <p><u>To Note</u></p> <p>Strong support for all LGS areas.</p> <p>Historical significance of some LGS areas</p>  |
| Yes     | Overall Plan in particular Objective 4 and CW 3 | <p>I have lived at the Gears Lane end of Tregurtha View for over 17 years.</p> <p>I wish to express my support for any action which would result in the preservation of the land in question. I fully understand that there is a need for housing in West Cornwall but not at the sacrifice of the environment we all treasure and certainly not when elitist developments serve mainly to increase the wealth of the individual owning the land. As a life-long naturalist / birdwatcher I have paid particular interest in the wildlife of the surrounding district and noted with dismay the annual decreases in populations as habitats disappear. I have recorded over 80 species of birds from my garden and mammals such as Hedgehog, Fox and Pipistrelle Bats but these are only the last few survivors and it is well known that many birds and insects once widespread have now gone. When I first moved into my house Great Green Bush Crickets and Cockchafers were numerous in the summer but have now been absent for some years. Close to the field in question there are breeding Green Woodpeckers, Tawny and Barn Owls but a further expansion of Goldsithney would surely herald their disappearance</p> <p>In summary, I welcome the Perranuthnoe Parish Neighbourhood Plan and hope that sanity will prevail.</p> | <p><u>To Note</u></p> <p>Importance of green infrastructure and green spaces for the environment / wildlife.</p> <p>Overall support for the Neighbourhood Plan</p> |
| Yes     | CW 3 in particular                              | I am writing to support the proposals set out for Goldsithney in the neighbourhood plan. Personally, I think it is a shame that a  | <u>To Note</u>   |

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|     | <p>LGS areas F, I and J</p> <p>NLB 4</p> <p>HTA 1</p> <p>EB 2</p> | <p>village of this size does not have more green space. If we lose any of the green space the village will lose its character and unique qualities.</p> <p>I think it is extremely important that the village is separated from its neighbouring villages and so consider spaces F, I and J very important in this regard. I frequently go walking down gears lane and enjoy the sense of space and openness as you pass the new houses at the bottom of Gears Lane and then can look across the paddock (space F) and open fields to the trees on the horizon and take in the scenery as you pass the engine house. It's a tranquil walk with horses and rabbits in the fields and birds in the trees singing. This is all part of what makes this village such a beautiful place to live and any changes to the local green areas would in my opinion detract from its current unique character and beauty</p> | <p>Importance of local green space surrounding village of Goldsithney in particular strong support for LGS areas F, I and J</p> <p>Importance of / support for Settlement Boundary to Goldsithney</p>   |
| Yes | <p>CW 3 in particular areas G and K</p> <p>HTA 1</p> <p>NLB 1</p> | <p>With regard to the Perranuthnoe Parish Neighbourhood Plan I <b>would like to express my support for the draft plan</b>, especially concerning the protection of green spaces.</p> <p>This is important for a variety of reasons; supporting wildlife, vegetation and bio diversity; protecting the rural quality of the village and providing leisure facilities for residents, locals and holidaymakers.</p> <p>The proposed village boundaries would allow for adequate development whilst protecting the countryside and atmosphere of the village. Designated green spaces within the village, such as St Piran's Hall playing field and Goldsithney Cricket pitch would guarantee leisure facilities for future generations.</p> <p>I hope your proposals regarding green spaces are retained within the final Neighbourhood Plan.</p>   | <p><u>To Note</u></p> <p>Support for overall Neighbourhood Plan</p> <p>Support for protection of local green spaces and particular importance of LGS areas G and K to village of Goldsithney</p> <p>Importance of / support for Settlement Boundaries</p> |
| Yes | <p>CW 3 in particular LGS areas F and K</p>                       | <p>As a permanent resident of Goldsithney I would like to record my general approval of the Perranuthnoe Neighbourhood Plan.</p>   | <p><u>To Note</u></p> <p>Overall support for the Neighbourhood Plan</p>   |

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|     | HTA 1<br>NLB 1<br>NLB 3  | <p>In addition to general approval of the intention to ensure considered and appropriate future development in the area I would like to specifically commend the suggestion to designate Local Green Space (LGS) within the parish. Despite being set within the largely rural county of Cornwall I feel it is of great importance to recognise those green spaces within the parish that serve such a vital role in preserving the green environment for their value in delivering ecosystem services to residents and visitors alike. I feel that it is vital to recognise and protect the value of these spaces before they fall victim to infill development, or urban sprawl, and are lost to us for ever.</p> <p>As a Biologist, Environmentalist and keen dog walker I particularly value the green spaces near my home in Gears Lane. So, in addition the designation of the Cricket ground LGS at the heart of the village I particularly value the proposed designation of the area adjacent to Gears Lane, designated LGS F, which ensures the rural nature adjacent to this ancient trackway and well used footpath can continue to be enjoyed by the many pedestrians, horse riders &amp; dog walkers that use and value it for its natural beauty.</p> <p>I hope the Neighbourhood Development Plan continues to receive the acceptance that it deserves and is adopted by the County Council for use in determining future development decisions.</p> | Support for designation of all propose Local Green Spaces (LGS) in the Parish and in particular strong support for LGS areas F and K.  |
| Yes | CW 2<br>CW 3 in particular<br>LGS areas F, G, K, L, M, J<br>NLB 4<br>HTA 3 | <p>I'm writing in response to the Perranuthnoe Parish neighbourhood plan in regard to the importance of green spaces in Goldsithney.</p> <p>Since moving to Gears Lane in November 2017 I have really enjoyed the range of lovely walks on our doorstep and I know I'm not alone in finding solace in the feeling of being able to be immerse myself in the natural environment right on our doorstep.</p> <p>Throughout Lockdown I've noticed that so many local people really make use of these undeveloped areas walking their dogs, enjoying time with their families and being able to keep</p>   | <p><u>To Note</u></p> <p>Strong support for LGS in / surrounding Goldsithney and of green infrastructure and public rights of way surrounding the village (LGS Areas F, G, K, L, M, J)</p> |

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|   |  | <p>their minds and bodies healthy during difficult times. Even before Covid I would say that the local green spaces were extremely well used and loved. One of the attractions of Goldsithney is that it is a real village set within proper countryside.</p> <p>Since I moved here, with my husband and our dog, we have seen several new houses going up nearby. I certainly appreciate the importance of new homes in Cornwall especially affordable houses but if too many houses are being built then the very thing that makes this such a special place will be destroyed forever. I hope very much that the approval of this Plan will help to control inappropriate development. We have something unique here and it needs to be cherished.</p>  |   |
| No (but moving to the Parish December 2021) | CW 3 in particular<br>LGS Areas F and J<br>HCA 1 | <p>Our daughter and son in law live in Goldsithney. We are moving to Rosudgeon in December to spend our retirement in the local area. We have visited many times over the years. We would like to support the proposal for green spaces contained in the neighbourhood plan. We particularly support the green spaces F&amp;J for a number of reasons. Firstly, they have an important role in separating the boundaries between parishes in the area. If these were not here there would be creep into a larger conurbation which would spoil the essence of the local communities. In addition, both areas border important walking areas that support a whole host of wildlife in the fields, trees and hedges. The area that is most important to us to protect is the green space F which is an area that we frequently walk and for us has historical significance in protecting the area down to the engine house and tin mining history of the local area and community.</p> <p>This is the start of the world heritage site and should be protected for future generations to be used as it is now safely by walkers, bird watchers and horse riders.</p> | <p><u>To Note</u></p> <p>Support for all proposed LGS areas, and in particular areas F and J.</p> <p>Historical significance of area F and of World Heritage Site</p> |
| No x 2                                      | CW 3 in particular                               | <p>We have been holidaying in and around Goldsithney and Perranuthnoe for many years now and love the walks and beaches in and around the area. We noticed this year that you</p>  | <p><u>To Note</u></p> <p>Importance of walks and beaches to attraction of Goldsithney and Perranuthnoe</p>  |



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|     | <p>areas F and J</p> <p>NLB 1</p> <p>NLB 3</p> <p>HCA 1</p> <p>HCA 3</p> | <p>are consulting on a neighbourhood plan and hope we are allowed to respond even though we are not local.</p> <p>We would like to support the proposal for green spaces F &amp; J. We regularly walk our dogs through and past both of these spaces. Gears Lane has changed over the years but what hasn't changed is the open countryside with its beautiful views across paddocks with horses and fields of crops. In both of these areas we regularly pass many dog walkers and horse riders. The area designated F in your proposal is particularly important to us as we walk down the old historic track to the engine house and horse stables that form part of the world heritage site. Walking down gears lane from the edge of the village you are immediately welcomed by the green fields, rabbits and birds in the fields and hedgerows. We often stop here and watch the wildlife and horses in the field with the views up across the farmers fields. This for us is a retreat from hectic life. This for us is part of what makes the area so special, the feeling of openness and light, without traffic, and the feeling of what it must have been like all those years ago as horses and families walked the same path with the same or similar views. It would be a shame to lose the historical significance of this route in particular. We hope to be able to continue to walk these routes for years to come</p> | <p>Strong support for LGS areas F and J</p> <p>Importance of Historic landscape surrounding Area F</p>  |
| Yes | <p>CW 3</p> <p>HTA 1</p> <p>NLB 1</p>                                    | <p>I should like to say that I am <b>in full support of the Perranuthnoe Parish Neighbourhood Plan</b>, as I feel that it is of paramount importance to protect our green spaces in Goldsithney. In particular, our natural wildlife should be preserved, as well as the village feel of Goldsithney. I believe that our future generations should be afforded the pleasures of the open countryside.</p>   | <p><u>To Note</u></p> <p>Strong support for Neighbourhood Plan</p> <p>Strong support for protection of all LGS.</p> <p>Importance of village character of Goldsithney</p>   |
| Yes | <p>CW 3</p> <p>HTA 1</p> <p>NLB 1</p> <p>NLB 4</p>                       | <p>I <b>fully support the Perranuthnoe Parish Neighbourhood Plan</b> especially with respect to the need to ensure that our local green space is enjoyed and protected for current and future generations and protection for our wildlife.</p> <p>For example, in order to retain the distinctive local open green space of Gears Lane that is enjoyed by so many people, I feel</p>  | <p><u>To Note</u></p> <p>Full support for Neighbourhood Plan overall</p> <p>Importance of / support for protection of all LGS and of green infrastructure of the Parish</p> |

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|     |  | <p>that it is necessary to ensure that the continued expansion of property developments does not destroy the remaining valued characteristics of the landscape.</p> <p>With the recent increase of property developments along Gears Lane, I also feel it is vitally important to sensibly protect the open fields, hedgerows and open views amongst the Cornish hedges, native vegetation, and the wildlife they support. This should also help to ensure that sufficient green spaces between various buildings are retained and protected to maintain easy access and views to the tranquil countryside. Open green spaces, hedgerows, trees and especially the views and canopy of overhanging branches between Owen Vean and Tregurtha are enjoyed by an increasing number of people.</p> <p>I also strongly support the proposal for a protected local green space at the eastern edge of the Parish around Fore Street and Nanturras towards The Avenue. The views over the open fields surrounded by Cornish hedges and mature trees needs to be preserved. It is an attractive approach to the village where the bank of mature trees open out onto open fields and more distant views.</p> <p>I fully support the proposed Neighbourhood Plan in order to protect the open green space and heritage of the village for our future generations.</p> | <p>In particular importance of LGS areas F,I, J (eastern edge of the Parish around Fore Street and Nanturras towards The Avenue)</p> <p>Importance of Settlement boundaries and in particular Goldsithney</p> <p>Importance of protecting hedgerows</p> |
| Yes | <p>CW 3 in particular areas F, K and G</p> <p>NLB 3</p> <p>HCA 1</p> <p>HCA 2</p> <p>HCA 3</p> | <p>I think the plan is important to protect the green space within the Goldsithney Community and ensure it continues to thrive as a community. The proposed greenspace F is particularly important as it is a very small and old lane on the world heritage site which keeps the village history and heritage as a reminder of the origins of the village as it leads to the old engine house. This lane is busy with horse riders and walkers, children on bikes and full of wildlife. I also support the areas designated K &amp; G allow for the recreational element for the village. In particular, they allow for recreational activities for young and old within the village.</p>  | <p><u>To Note</u></p> <p>Importance of LGS proposed around Goldsithney and strong support for LGS areas F, K and G</p>  |

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|     |  | I am in <b>full support of the plan</b> in helping to enable a continued sense of community, history, heritage and protecting wildlife.  |  |
| Yes | <p>CW 3 in particular<br/>LGS area<br/>F</p> <p>CW 5</p> <p>NLB 3</p> <p>HTA 1</p> <p>HTA 3</p> <p>HCA 1</p> <p>HCA 2</p> <p>HCA 3</p> | <p>I have lived in Goldsithney for 47 years, the last twenty-eight years in Gears Lane. I have seen many changes in the village in this time, many of them for the good, and I feel that it is very important that we do not lose more of what makes Goldsithney, Goldsithney. I appreciate the need for housing, particularly affordable and social housing, but think this must be counter-balanced with ensuring that the character of our Parish and surroundings is maintained. In Gears Lane, because it is partly impassable for vehicles, people use it safely without fear of too much traffic. However, since the pandemic, it has become increasingly busy due to home delivery vehicles. Also over the last twenty-eight years there has been a great deal of development in the lane resulting in more traffic. Gears Lane is very well used by walkers, dog walkers, ramblers, and runners as well as children, horse riders and cyclists. During the lockdown, the lane was a useful amenity for those wishing to exercise thus helping to aid the health of the community. The green space between the end of the metalled road and Plain an Gwarry is a great asset to our neighbourhood, with far reaching views and unpolluted air, and of course it offers a wonderful habitat for our native flora and fauna. It also offers a great space for the children in the community to have experience of traffic free adventures. We must not forget the Gears Lane leads to the world heritage site of Tregurtha as well as being a historic border between our three local Parishes, Marazion, Perranuthnoe and St Hilary. I fully support the Neighbourhood Plan for the whole of our Parish but in my remarks, have mainly focused on Gears Lane, as that is the area best known to me. We, as residents of the Parish of Perranuthnoe, have a responsibility to protect our Cornish Heritage and the surrounding area including our World Heritage Sites as well as our heritage as a strong farming community. We are responsible for leaving our Parish in a good state for those who follow us. Thank you for the work that has been done so far.</p> | <p><u>To Note</u></p> <p>Full support for Neighbourhood Plan overall</p> <p>Importance of good spatial planning in particular around Gears Lane</p> <p>Support for affordable and social housing.</p> <p>Strong support for LGS Area F</p> <p>Importance of Cornish Heritage to the Parish</p> |

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| Yes | CW 3 and in particular LGS areas F, I and J<br>CW 5<br>HTA 1<br>NLB 1<br>NLB 4 | I would like to <b>confirm my support for the Perranuthnoe Parish Neighbourhood Plan</b> . I feel it is incumbent upon us to preserve green spaces and the resultant wildlife environment not just for the present but equally importantly for the future. Given recent building development along Gears Lane. The need to retain and protect the surrounding countryside together with the diverse range of hedgerows, trees and vegetation is strongly highlighted. Distancing between buildings should reflect the importance of open green spaces and access to the wider countryside. In particular, the natural 'countryside' feel to Gears Lane leading to Tregurtha is attracting an increasing number of walkers. I also support the proposal for a protected green space adjacent to Fore street and Nanturras towards the Avenue. The mix of trees, hedgerows and open fields makes this an especially attractive feature when approaching the village. Finally, I reiterate my support for the Neighbourhood Plan which will help protect and sustain the natural openness and village character well into the future. | <p><u>To Note</u></p> <p>Support for the Neighbourhood Plan overall</p> <p>Importance of provisions in NDP for protection of green spaces and green infrastructure in the Parish. Particularly strong support for LGS Areas F, I and J</p> <p>Importance of spatial planning in order to reflect the importance of green infrastructure.</p> <p>Importance of provisions in the plan to protect village character</p> |
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**2: Those opposing policies within the NDP, or who request change that would significantly affect NDP policies and objectives**

| Parish Resident | Paragraph or Policy | Comment   | Parish Response   |
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| Yes             | HTA 1, Figure 23    | <p>I do not agree with the development boundary of Rosudgeon therefore I do not support the neighbourhood development plan.</p> <p>I am aware, talking to people locally, what the Parish Council are putting forward is not correct and not democratic in the views of local parishioners, therefore if the Parish Council does not agree with my comment, they should produce the evidence which supports their claims.</p> | <p>It is not clear from the comments why the respondent does not support the Rosudgeon Development Boundary, or what changes they would like to see made.</p> <p>The consultee asks how the Development Boundary was determined. This is outlined in the NP; the Boundaries were established through a process of professional assessment and consultation.</p> <p>It is again important to emphasise here that this is not a 'Parish Council' document, it is something which the Parish community and Parish Council have worked on together over the last 5 years, with advice and input from a range of stakeholders and experts. It has been developed through a process of extensive research and consultation.</p> |

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|     |   |  | Note: the respondent's specific concerns in relation to Rosudgeon Development Boundary were subsequently clarified following the Reg 14 consultation process, when a planning application was submitted for construction of buildings on their land adjacent to the proposed Development Boundary. Planning permission was granted for the site.  |
| Yes | The overall Plan and in particular HTA 1, Figure 23 | <p>I cannot support the neighbourhood development plan. The way it is written, repetitive, information is missing or inaccurate and making the reading of it not straight forward. It comes across with some negativity of the Parish Council dating back to 2013. It refers to the public consultations, where is the evidence???</p> <p>The motion to put forward evidence from the consultations and seconded to be put on the Parish website has failed to materialise. So it is just words, do people of the parish support it?</p> <p>No ratio of the public to population figures of the parish. The population figure of around 2300 can be questioned when it conflicts with the consultation strategy document of 3875. Therefore I would question the number of people who support the NDP from the parish in relation to this population figure? Next years census will give a more true indication of population in the Parish.</p> <p>There has always been a negativity for development in the Parish stating further open market homes are not required and this comes across in the NDP as the development boundaries have been changed. An example of a recent application PA20/03492 where the planning officer wrote that they disagreed with the parish council's objections stating housing targets in the Cornwall local plan are a minimum and not necessarily a restriction on further open market housing.</p> <p>Rosudgeon village boundaries changed many times. I believe this should be changed back to the original map below. (A map is included in the comments</p> | <p>It is disappointing to read that this consultee feels that the Plan is not written in a straightforward manner and that it comes across with some negativity. The overwhelming feedback from this Reg 14 consultation process has however been that Parish community members and statutory consultees feel that the Plan is clear and well written, the level of detail and depth of analysis in it is helpful, and that it provides clear planning guidance, charting a positive path to sustainable development in the Parish.</p> <p>It is acknowledged that there is some repetition between the 'Justification' sections under each NDP Policy. The 'justification' sections provide a synthesis of relevant national / county policies, rules and regulations, and an assessment of how these apply to that policy. Each NDP policy aligns with a number of national and county planning policies and regulations. There is implicitly therefore some repetition.</p> <p>The consultative process that has been followed for development of the Neighbourhood Plan is clearly outlined in the Plan with further detail provided in the annexed Consultation Statement. The criticism by the respondent that it is 'just words' and questioning of whether people in the Parish support the Plan, is perhaps best answered by the responses received through this Reg 14 consultation process. These show that there a very strong level of support for the Neighbourhood Plan across Parish Communities.</p> <p>The Plan is the result of a partnership between Parish Communities and the Parish Council, with input and advice also from a range of experts and stakeholders. The NDP has been built on the information provided by Parish communities over the last 5 years, and the policies in it reflect the priorities which local people have repeatedly identified.</p> <p>The respondent objects to the Rosudgeon Development Boundary, and feels that the original settlement boundary identified in 2018 should be used instead of that currently proposed in the NP. The current Rosudgeon Development Boundary outline was determined based on the results of the assessment and consultation process. Some of the</p> |

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|     |             | <p>which shows the original development boundary for Rosudgeon which was circulated as part of the consultation on proposed Development Boundaries in 2018)</p>  | <p>land originally included within the Rosudgeon Development Boundary was identified as being more appropriate for affordable housing exception sites under policy HTA3 than as development land under policy HTA1.</p> <p>It is again important to emphasise that the Plan aims to chart a positive approach to sustainable development, providing housing for those who most need it, whilst working to conserve valued AONB &amp; WHS landscapes and assets. The NDP vision, objectives and associated policies how it aims to achieve this.</p> <p>The feedback received from the majority of respondents in this Reg 14 consultation process confirms that local people feel that the NDP focuses on priority planning issues for this Parish, and provides appropriate policy guidance, charting a positive path for sustainable development which achieves the right balance between provision of homes for those who most need them, and conservation of AONB / WHS landscape and settlement character and assets which are so highly valued and an important part of the lives of local people here.</p> <p>Note: the respondent's specific concerns in relation to Rosudgeon Development Boundary were subsequently clarified following the Reg 14 consultation process, when a planning application was submitted for construction of buildings on their land adjacent to the proposed Development Boundary. Planning permission was granted for the site.</p> |
| Yes | Policy HTA1 | <p><b>Policy HTA1: Development Boundaries</b></p> <p>The plans relating to the Development Boundaries are out of date with in excess of 50 sites that have obtained planning permission within recent years, not shown on the plan. Many of these properties are outside of the proposed Development Boundaries and if shown, the density of housing would be different, resulting in different boundaries.</p> <p>The proposed boundaries are restricted to areas within the parish that are quite densely populated and already have problems with parking and congestion. I am concerned that due to the density of these areas, most of the future planning applications will be in the gardens of existing properties, which will result in</p> | <p>The Parish noted and were concerned about the comment made t by this respondent and a couple of others that they had not been aware of the consultation until late in the process, and that they felt it was poorly advertised. The consultation had been publicised through posters, the Parish Council website, the dedicated NP website and social media. However recognising the limitations and impact of the various Covid 19 restrictions and that the Parish had not been able to organise any physical events or meetings, the decision was made to extend the Regulation 14 consultation period for an additional 6 weeks. This included the delivery of leaflets across Parish households, further posters and information dispersed on social media and via the Parish Council website and dedicated NDP website. A public open day was also held in the Parish Hall, organised to respecting social distancing and all Covid 19 restrictions. There was extensive feedback from across the Parish during this extended consultation period.</p>   |

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|  |  | <p>small plot sizes and only increase these problems. There are other clusters of housing within the parish, that if included in the boundaries, would provide a higher quality of development and larger plot sizes. These sites would still need to be recognised as infill or rounding off, to avoid development extending into open countryside or the loss of green breaks.</p> <p>I do not think the draft NDP will provide enough housing over the 10-15 year duration, which in my opinion will make it more likely to be challenged. Extending the boundaries would allow more properties to be provided and bring the NDP more in line with current Government guidelines.</p> <p>Due to my years spent on the Parish Council, I have a keen interest in local planning issues, however, I feel the consultation period was poorly advertised, as I and many other local people were totally unaware of it. I note that posters have recently been put up around the Parish, but only leaving a few days for Parishioners to make comments. The creation of such an important document requires everyone in the parish to be made aware.</p> | <p>The respondent raises the concern that the development boundaries do not include plots of land recently granted planning permission on the edge of settlements. Since the NP was first publicised there have been a considerable number of planning applications outside the proposed boundaries, on the edge of settlements, and many of these have been approved. The draft NP Development Boundary policy currently carries very little weight in decision-making by the Planning Department.</p> <p>The Parish acknowledges that a considerable number of planning applications have been approved in recent years outside the proposed NP boundaries, however assessment of sites recently granted planning permission indicates that this does not significantly alter the form of the settlement areas. It is also important to note that where housing has been approved for affordable housing this has not been included within the Development Boundary, recognising that these are 'exception sites'.</p> <p>The respondent also makes a valid point in that it is important that the Development Boundaries do not to encourage overcrowding, small plot sizes, and additional congestion and parking problems. It is important that the assessment of planning applications within Development Boundaries fully considers the impact of the proposed development on people and place, in line with the new Cornwall Design Guide and NP Policies and CW5 and BDL1. Amendments have been made to NP Policy HTA1 (Development Boundaries) to include clear guidance on the need to ensure that within these boundaries infill development does not result in overcrowding. Please refer HTA 1 point 2.</p> <p>Effective implementation of NP policies CW5 and BDL1 will also be critical in ensuring that development does not result in overcrowding and congestion.</p> <p>Delineation of the Development Boundaries was based on professional assessment, clear criteria, consideration of housing need, and the results of public consultation. The findings of this assessment are that the proposed boundaries are adequate to cover local housing needs over the 9-year lifetime of this NDP. The Parish places a priority on the provision of affordable housing which allows for exceptions sites where clear local need is demonstrated. When the Development Boundaries are considered alongside provisions for exception sites, and considering the extensive number of planning permissions allocated in this Parish over the last 10 years, many of which have not yet been built, the land</p> |
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|     |       |  | area allocated within this Policy is appropriate and adequate for the lifetime of the Plan.  |
| Yes | HTA 2 | <p>We have recently made a planning application to convert a building at our property and you have objected saying; it is in the countryside, it is not of any heritage value or architectural merit, and it doesn't meet the criteria in the Cornwall Council local plan or the draft Perranuthnoe NDP for the re-development of redundant buildings.</p> <p>We did not know anything about the new draft plan that you have prepared, but have now looked at it on-line. We thought that the whole point that the Government brought in Neighbourhood Planning was to be positive and allow local communities to encourage development, but it seems that you want to restrict, control and stop people doing just about anything!</p> <p>We think that our application is acceptable having regard to Government and Local Plan policies. These are aimed at allowing people to convert suitable buildings in the countryside. Your Policy HTA 2 refers to conversions. It says that buildings to be converted must adjoin a settlement (and you have drawn maps of the settlements). This is not in accord with the Government policy or the Cornwall Council Policy 7 which specifically relate to converting buildings in the countryside!</p> <p>Also it is entirely unreasonable to say that only buildings having "heritage value" (whatever that might mean) are allowed to be converted. In any case, in other parts of your plan you seem to be trying to stop anything that will affect the heritage value of the area. The World Heritage Site people have not objected to our application, and we can see nothing wrong with it at all.</p> <p>We are in the grip of horrible pandemic, and the worst economic recession in living memory. Your whole</p> | <p>This respondent contests the Parish Council's comments and Cornwall Council's decision on a specific planning application. Grievances over individual planning application should be dealt with through the planning application / appeal process. This NDP consultation response does not therefore address the specific concerns raised relating to the individual planning application.</p> <p>However, in response to the critique that both the decision on this application and the NDP run counter to Cornwall Local Plan Policy 7: it is important to clarify that CLP Policy 7 does not encourage development in the Open Countryside it outlines the 'special circumstances' when this might be allowed. CLP Policy 7 states that: <i>'the development of new homes in the open countryside <u>will only permitted where there are special circumstances</u>'.</i></p> <p>It outlines the special circumstances in which it may be possible to allow development in the open countryside. One of the exceptions cited in the policy is for: <i>'historic buildings that are considered appropriate to retain'</i>.</p> <p>NDP Policy HTA2 reflects this guidance. The way in which it aligns with CLP Policy 7 is outlined in the 'justification' section below the policy.</p> <p>The respondent questions what the term 'heritage value' means within the NDP. The best response is perhaps to quote the National Planning Policy Framework (NPPF). Under NPPF Section 16, paragraph 184 it provides the following planning guidance on heritage assets / value: <i>'heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations'</i>.</p> <p>There are a number of references in the respondent's comments to 'you' objected to our planning application, 'your' Plan, the implication presumably being that they feel that they are speaking to the Parish</p> |



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|   |   | <p>Plan needs to be reviewed and made much more positive instead of negative!</p>  | <p>Council in raising objection to the decision on their planning application and to elements of the NDP?</p> <p>It is important to emphasise here that this NDP is the result of a partnership between Parish communities and the Parish Council over the last 5 years, with input and advice from a broad range of community members, affected stakeholders, statutory consultees and experts. It has been developed through a process of extensive research and consultation.</p> <p>The NDP process and this Reg 14 consultation has had wide publicity and there has been broad participation by community members across the Parish. As part of this process, it important that the respondent has had the opportunity to raise issues of concern, and that we can consider the issues raised and provide a response.</p> <p>The NDP aims to support positive patterns of development which bring long-term benefits to local communities and which respect protected AONB and WHS Parish landscapes. The overwhelming support for the Plan which has emerged from this Reg 14 consultation process indicates that there is a strong level of support for the NDP, and an overall feeling that it achieves a good balance between providing homes for those who need them most, supporting sustainable local businesses, and protecting the local assets and landscapes which communities value for the benefit of current and future generations.</p> |
| <p>Non-Resident with property in the Parish</p> | <p>General<br/>HTA 1<br/>HTA 2<br/>HTA 3<br/>BDL 1<br/>CW 4</p> | <p><b>General comments</b></p> <p>i) The PC make a lot of the consultation process undergone in association with the preparation of the NDP (and their “development boundaries” which were actually drawn over 2 ½ years ago). Putting something on the PC website is just not good enough though. Most people are not going to randomly look at a PC website. It needed letters and “flyers” to be distributed, and notices displayed around the parish and on parish notice boards. We saw none of this when the “development boundaries” were drawn, and have only just found out about the NDP this week (21/08/20) when we have seen posters put up (10 days before the deadline of consultation!).</p> | <p>i) The NDP has been developed through an extensive process of public consultation over the last 5 years, this has involved consultation events publicised through flyers, posters and social media, distribution of awareness raising information, topic and group focussed consultation sessions, house to house consultation, as well as information distributed on the Parish Council website and through the dedicated NDP website. The NDP Steering Group comprises community and Parish Council volunteers. The NDP is the result of an ongoing partnership between Parish communities and the Parish Council, with multiple opportunities for interested parties to participate.</p> <p>It is unfortunate that this consultee has not engaged in that process. It is more difficult to ensure that all non-residents are directly engaged, in particular considering the significant number of individuals owning second-homes and investment property in this Parish. The Parish Council website, dedicated NDP website and information shared on</p>   |

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|  | <p>ii) The draft NDP is a huge rambling overly complicated document that the vast majority of people are not going to have the time (or inclination) to analyse carefully. We (and other locals that we know) have had various dealings with the planning process, and have faced nothing but negativity and objection from the PC. Fortunately though the Cornwall Council have granted us permissions (and when we had one refusal permission was granted by a Planning Inspector on appeal). We thought that the reason the Government introduced the NDP process was to allow local communities to identify how development could be reasonably achieved/brought forward. This document does none of that, but simply introduces a whole load of very complicated, restrictive and negative provisions. If this document gets adopted as proposed parishioners will have to jump through a multitude of hoops (and incur additional expense) to get permission for anything. The policies say regularly that proposals must comply with all of a number of criteria for a proposal to be acceptable. Past experience has shown that the Parish Council has a negative attitude to new development, and this document will just give them many more excuses to object to proposals, and try to stop development.</p> <p>iii) In several of the policies there is an indication that applications for outline planning permission should not be allowed. Planners should seek full plans and details. The Government legislation allows people to make outline applications to find out if a proposal is acceptable in principle without having to go to the expense of having to provide all this detail without knowing first that the principle is acceptable. The PC is trying to subvert national legislation which could result in residents being put to significant abortive expenditure that would otherwise be avoided.</p> <p>Specific points.</p> <p><b>Policy HTA1 Development Boundaries</b></p> | <p>social media aimed to ensure that those living outside the Parish could access information, provide input and share views if they wanted to engage. However, the Parish didn't specifically contact all individual non-resident property owners; the Parish does not have the resources for doing so and it is not normal NDP practice.</p> <p>It is noted that this consultee only saw the posters and became aware of the Reg 14 pre-submission consultation 10 days before the end of the consultation deadline. The Steering Group and Parish Council decided that given the Covid restrictions and the impact, the consultation period needed to be extended. It was subsequently extended by 6 weeks (September / October) with extensive further publicity, information distribution and a socially distanced open-day.</p> <p>ii) The responses received from the majority of consultees (community and statutory) in this Reg 14 process, indicate that the over-riding sentiment is that the Plan provides clear and well-focussed planning guidance, and that the level of detail and analysis in the Plan, and the structure of it, are helpful, providing the information and planning guidance which is needed here. Although this consultee states that she does not have the inclination or time to read the Plan because it is too detailed, the feedback received from the majority of respondents is that they do, and that they find the depth of the Plan useful and informative. The Parish have prepared a summary document outlining the NP objectives and policies, to enable those who do not wish to read the whole plan to understand the overall framework. The summary documents were delivered to households across the Parish and also available for download from the website. The website also provides an online summary.</p> <p>It is noted that the consultee is frustrated that the Parish Council and Cornwall Council have not supported two planning applications, and that this is viewed as 'negativity'. The NP is not the place to discuss individual planning applications, however, it is important to understand that the Parish Council aims to hit an appropriate balance between providing housing to meet local need, and protecting valued community assets and AONB / WHS designated landscapes. These are core to the quality of life for people who live here, and maintaining these valued landscapes and assets also supports local businesses. The need to achieve an appropriate balance in levels and location of development may mean that some planning applications are not supported.</p> |
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|  | <p>a) The “development boundaries” were drawn years ago, and are drawn very tightly (and randomly) around buildings shown on OS maps. It is clear from the HTA (housing) policies in the draft NDP that the aim of the PC is to stop all new development outside of the boundary lines. This is also evidenced by the comments made by the PC on planning applications over the last few years.</p> <p>The “development boundaries” are drawn far too tightly, and arbitrarily, around the identified settlements. Many buildings are excluded, and there is very little room within the boundaries to provide any new properties whatsoever (especially when you must comply with all of the ridiculously restrictive/prescriptive criteria in Policy BDL1 about design). The boundaries need to be redrawn to include more of the properties in the settlements that have been excluded, and also the sites like ours where planning permission has been granted and which are excluded.</p> <p>The PC say the boundaries are necessary to prevent the coalescence of the settlements and prevent “ribbon development”. They also say that their policies are in line with Policy 7 of the Cornwall Local Plan (which relates to development in open countryside). Their policies do not however show any conformity with Policies 2, 3 and 21 of the Cornwall Local Plan. There is no reason why all proposals outside the “development boundaries” would automatically cause “ribbon development” or the coalescence of the settlements. Some proposals might be reasonable “infilling” between, or “rounding-off” of existing groups of dwellings. They might also represent development of sustainably located “brownfield land”. Applications should be decided on their own individual merits. The best people to make a judgement are the professional planning officers, and they need to have some scope to apply their expertise and discretion in making</p> | <p>The feedback from this Reg 14 consultation process demonstrates that the majority of respondents consider that the NP has achieved an appropriate balance in facilitating sustainable development that meets local housing needs whilst also supporting the conservation of valued local landscapes and assets.</p> <p>iii) the NP does not state that outline planning should not be used. It encourages use of the Town and Country Planning Order Part 3 Article 5 (2) in areas of significant heritage or environmental significance, but only in these exceptional circumstances. The justification sections under each Policy provide the analysis of how each policy aligns with national planning legislation and policies. This is the information and analysis which the consultee objected to under point (ii) as being too long and complicated. However, it will hopefully provide a clear answer to the concerns raised.</p> <p><b>Policy HTA 1: Development Boundaries</b></p> <p>The ‘development boundaries’ have been established through an extensive consultation and research process. Discussions started in 2017, and in 2018 Cornwall Council Planning Department provided support for professional settlement boundary assessment &amp; mapping. The result of this assessment was subsequently put out to rounds of public consultation and the boundary lines were amended based on the results of that consultation process. The NDP was then submitted for SEA assessment and in some instances the boundary lines were again amended to respond to statutory consultee’s comments and recommendations.</p> <p>The ‘Development Boundaries’ put forward in the NP are then based on professional assessment, and an extensive consultation and assessment process. They are in no way ‘randomly’ or ‘arbitrarily’ determined as this respondent claims.</p> <p>The respondent raises concerns about the impact of the proposed Development Boundary on planning permission which has already been granted for housing development on a site that lies outside the Development Boundary. It is important to clarify that the NP will not have any bearing on planning permission already granted.</p> <p>There appears to be a misunderstanding about what the Development Boundaries represent. They do not map out all areas where there has</p> |
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|  | <p>decisions. The housing policies in the draft NDP will allow no scope for the exercise of common sense and discretion whatsoever.</p> <p>Policy HTA of the draft NDP should be amended as follows:</p> <p><b>Policy HTA 1: Development Boundaries</b></p> <p>The Development Boundaries outlined in Figures 23 to 26 show areas of the Parish within which new building development will be permitted. Within these Development Boundaries, infill development of one or two houses will be supported, where it conforms with other policies in this NDP.</p> <p>Outside of these areas new residential development will only be supported where it constitutes either; small scale “infill”, “rounding-off”, or development of “previously developed land”, in sustainable locations.</p> <p><b>Policy HTA 2: Replacement Buildings and Conversions</b></p> <p>b) Policy HTA 2 relates to conversions and replacements of existing buildings. In relation to conversions the policy arbitrarily excludes a number of stated types of buildings. It also says that buildings to be converted must have “recognised heritage value” and must “adjoin an existing settlement”! You cannot increase the size of the building, and you must comply with the myriad of criteria in design Policy BDL1 Having looked at the maps in the NDP it is difficult to find any buildings at all that actually adjoin the settlement boundaries! The second part of policy HTA2 is equally restrictive. Replacements cannot have a larger footprint, and again must comply with all the criteria of other policies.</p> <p>The PC say that Policy HTA2 complies with Policy 7 of the Cornwall Local Plan. Again, this policy is however much more restrictive/prescriptive than the Cornwall Local Plan policy and national policy, and is</p> | <p>been /will be development; they indicate where future development should be located. This is explained in the NP.</p> <p>The respondent questions whether the Development Boundaries accurately reflect opportunities for ‘infilling’ and ‘rounding off’; these opportunities were considered in the 2018 professional planning assessment / mapping and in subsequent consultations. The Parish has decided to prioritise housing in these areas where it can be demonstrated that it meets priority local housing needs (refer Policy HTA3).</p> <p><b>Policy HTA 2</b></p> <p>NDP are designed to contextualise generic county &amp; national policies and apply them to the local Parish-level context. There would be no benefit to having an NP if it just replicated the generic wording of county and national policy; there needs to be enough clarity / detail in NP planning policy to remove ambiguity and provide local-level guidance. Policy HTA2 provides that guidance for replacement buildings and conversions.</p> <p>In relation to CLP Policy 7, it provides the Parish-level policy guidance necessary to enable planners to effectively assess the types of buildings which would be considered ‘appropriate to retain’ in this Parish and would lead to an ‘enhancement’ of AONB / WHS setting. Policy HTA2 aligns closely with CLP Policy 7, it specifies that building conversions would be appropriate where they are either ‘historic structures with local heritage value’ or ‘permanent structures of sound construction’. The temporary structures that are listed as excluded, align with those listed within national and AONB / WHS guidelines. Again, the policy justification section provides further information.</p> <p><u>To Change:</u> The consultee’s suggestion that it is unreasonable to state that buildings should ‘adjoin an existing settlement’ is very valid and the policy wording has been amended to remove this reference.</p> <p><b>Policy HTA 3:</b> See above: Small scale “infill” and “rounding-off” sites, and development of “previously developed land” will be prioritised for ‘affordable housing.</p> <p><b>Policy BDL1: Design</b></p> |
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|  | <p>wholly unreasonable. It would be difficult to actually make a proposal that could possibly comply with this policy!</p> <p><b>Policy HTA 3: Affordable Housing</b></p> <p>c) Policy HTA3. It's good to have a policy to support affordable housing for members of the community.</p> <p><b>Policy BDL1: Design</b></p> <p>d) Policy BDL1 relates to design. Firstly it states that a "Considered Design Statement" must be submitted with all planning applications. Whilst some applicants will wish to submit additional supporting information with their applications, in many cases the submitted drawings will be perfectly adequate to illustrate what is proposed. People should not be forced to go to extra time and expense producing unnecessary verbiage.</p> <p>The policy then goes on to list 10 criteria, all of which must be complied with in regard to all building work requiring planning permission!! This policy imposes excessively onerous requirements on persons wishing to apply for planning permission, and once again creates circumstances encouraging criticism/objection. The policy is unduly restrictive and imposes controls which go way beyond the requirements of policies in the Cornwall Local Plan and national policy.</p> <p><b>Policy CW4 Principle Residency</b></p> <p>e) Policy CW4. This suggests a "principal residency" restriction on new dwellings. We think that this is a good idea, but bearing in mind that under the other provisions of the draft NDP there aren't likely to be hardly any new dwellings, it will have very limited affect. We think that in St. Ives they have this policy, and new dwellings have a condition imposed on the permission. There is no need whatsoever to go</p> | <p>The respondent objects to undertaking a 'Considered Design Statement' and states that 'People should not be forced to go to extra time and expense producing unnecessary verbiage'.</p> <p>However, the requirement in this Policy for 'considered design' will soon be county wide. It follows the guidance in Cornwall's 2020 Design Guide which states that 'Context Appraisal' must underpin 'Design and Access Statements' and will be required for the majority of developments'.</p> <p>Unfortunately, this type of attitude that 'considered design' is unnecessary and costly verbiage, and that it should not be necessary to assess the impact of proposed development projects on people and place, is one which is all too frequently found in this Parish. It highlights the challenges which local communities, the AONB and WHS face in achieving positive and sustainable patterns of development.</p> <p>The urgent need for an NDP Design Policy providing clear local criteria and planning guidance has come out strongly as a priority from public consultations over the last 5 years. There is growing concern in the Parish over the impact which poorly thought-out and invasive development is having on AONB and WHS landscapes and settlements, and on the lives of local people.</p> <p>The county level requirement for 'Context Appraisal' and a 'Considered Design Statement' is based on recognition of the negative impact which poorly planned development is increasingly having on valued landscapes and on communities across Cornwall. There is recognition of the need to ensure that developers are required to assess impacts on places and people as part of the planning process.</p> <p>The 10 design criteria in NDP Policy BDL1 have been developed through a process of broad community consultation, with advice and input from the AONB, WHS, planners and affected stakeholders.</p> <p>The design criteria reflect the design policy criteria within AONB and WHS Management Plan policies, and also the 11 points of importance identified in the Chief Planning Officers Advice Note on Good Design.</p> <p>In relation to criticism which this respondent levels against the use of these local design criteria in Policy BDL1: again, it is important to emphasise here the role of an NDP in providing local contextual guidance, in order to enable appropriate application of generic county &amp; national policy wording at the local level. For example, the criteria in this</p> |
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|         |  | through a very expensive legal process to achieve this aim.  | <p>policy will help both planners and developers to assess how generic terms like 'enhance', 'appropriate' or 'innovative' should be interpreted at the local level.</p> <p>Feedback from this Reg 14 consultation process has demonstrated strong support for Policy BDL1, and for the criteria within it. It has highlighted again the concerns of local people over the impact which poorly planned and designed development is having on this Parish.</p> <p>'Considered design' which assesses the setting and context for proposed development and potential impacts of it, should not be considered unnecessary; it is basic good practice, and is particularly important within protected landscapes such as AONB and WHS. It is hoped that this NDP policy will help to facilitate this.</p> |
| Yes x 3 |  | Three members of the same family have submitted an identical letter (copy / paste) of the above representation submitted by the non-resident property owner. | Please see response above.  |

**Representations from Landowners and /or their Agents with specific concerns over the potential impact of Neighbourhood Plan policies on the future development potential of their land.**

| <b>Parish Resident</b> | <b>Paragraph No or Policy</b>               | <b>Comment</b>   | <b>Parish Response</b>   |
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| Yes                    | Rosudgeon Development Boundary Policy HTA 1 | <p>With reference to Rosudgeon Development Boundary: Request to change boundary to include garden.</p> <p>Our original concern with the proposed Perranuthnoe Parish Development Boundary was that it did not include our back garden. This has existing lawful use as residential land and historically has formed part of three previous planning permissions (application numbers PA12/10729-2021, 07/P/0462/F-2007 and 99/R/0585/B-1999) which have not been disputed by the Council ie the Council accepted the garden to be part of the whole curtilage.</p> | <p>Two members of the Steering Committee visited the property to assess the situation.</p> <p>They found that indeed an error had been made and that the proposed Development Boundary passed through an extension to the back of the house.</p> <p>In assessing the site, they determined that it would be reasonable to include an area of garden land to the back of the property in recognition of the fact that this is garden, clearly associated with the property, and that its inclusion would not extend the property boundary out to an unreasonable degree into the surrounding countryside. Its</p> |

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|     |  | <p>Although Cornwall Council has recommended that the Parish Council, in setting its boundaries 'should avoid gardens that protrude into open countryside', this is a recommendation and not a statutory requirement.</p> <p>As the map shows our property clearly to be related to Rosudgeon, and the Neighbourhood Plan is looking to support housing growth (as determined by the adopted terminology 'development boundary') we feel the back garden should be included within that boundary.</p> <p>Further to previous discussions on the matter, we have pointed out that the proposed boundary passes through an extension at the back of our house and that at the very least, it should be adjusted to an appropriate distance back from the house (map 1 enclosed)</p> <p>We also notice that there are two other properties with gardens protruding into open countryside that have their gardens included within the boundary (map 2)</p> <p>We hope that you will take into consideration our feelings on this matter before the boundary is finalised.</p> | <p>inclusion would not unduly affect landscape character in this area. The amended boundary line follows the edge of the property's vegetable garden.</p> <p>The land beyond it was assessed to be less clearly integral to the property garden, and it was felt that its inclusion within the Development Boundary would extend that boundary out to an unreasonable degree into the surrounding countryside. To do so would be inconsistent with the approach adopted by the NDP. It would not represent infilling or reasonable 'rounding off' and would open up an area of countryside to potential building development, which would affect WHS landscape character in this area.</p> <p>A recommendation was made to the NDP Steering Committee, and subsequently to the Parish Council, that the Development Boundary be amended to include the area of garden identified. This was agreed, and the Rosudgeon village Development Boundary has been amended in the revised NDP.</p>               |
| Yes | Perranuthnoe Development Boundary Policy HTA 1 | <p>With reference to the Perranuthnoe Development Boundary, I question certain areas of the boundary. Generally the boundary encompasses an "outskirt dwellings" garden, within the boundary but it is not consistent. I currently own 11 acres of land adjoining the village of Perranuthnoe and have no intention of development, however the current boundary completely ignores my garden boundary and therefore could restrict an extension to my existing property.</p> <p>My home in a modest 3 bedroom house and I have 3 children with the intention to adopt a child in the near future. We are hoping to begin stage 2 of the adoption process at the beginning of 2021 with Cornwall Council Adoption Agency having successfully completed stage 1 earlier this year. If a planning request was rejected, then this would have a major impact on moving forward to provide a comfortable dwelling for my family.</p>  | <p>Three members of the Steering Committee visited the property to assess the situation.</p> <p>Although the area of land proposed for inclusion within the Development Boundary does extend out from the immediate northern edge of the settlement, they determined that it is clearly used as a garden area, and is directly associated with the property.</p> <p>In assessing the site, they proposed that it would be reasonable to include this area of garden land within the Development Boundary. Although not clearly 'rounding off' or infill, the garden area is clearly part of the residential property and is clearly delineated to the west by a public footpath and hedge, west by an agricultural barn and north by a track leading from that barn. The garden land lies on low ground and is not a site that is prominent in the AONB landscape. It was felt to be reasonable to allow space for a potential future modest extension to the property on this side. It was not felt</p> |

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|            |   | <p>I have attached the Map of the Perranuthnoe Development boundary which clearly explains my observation. I was looking to request planning within the next 12 months to modestly extend my property and in keeping with the local design to provide further accommodation for an adopted child and in the future possibly elderly parents who currently live in the village.</p> <p>As I have mentioned, I see no clear logic in some areas of the proposed boundary and inconsistencies within its design. I have highlighted in yellow the perimeter of my garden which I would like to be considered to be included within the boundary. My house is indicated with a yellow arrow. I've also shown 2 examples of the boundary surrounding the perimeter of other people's gardens, indicated with a purple arrow.</p>  | <p>that inclusion of this land would risk an unreasonable level of housing development into the AONB landscape, or unduly affect AONB landscape character.</p> <p>A recommendation was made to the NDP Steering Committee, and subsequently to the Parish Council, that the Development Boundary be amended to include the area of garden identified. This was agreed, and the Perranuthnoe village Development Boundary has been amended in the revised NDP.</p>   |
| Land Owner | HTA 1 relative to Perran Downs Development Boundary<br><br>CW 3 | <p>Two objection letters relating to this individual / land area were submitted:</p> <ul style="list-style-type: none"> <li>i) by the landowner and</li> <li>ii) a formal objection letter by a Development Consultancy Company on behalf of their client</li> </ul> <p><b>Representation from landowner</b><br/>Our email concerns the proposed development boundary of the land adjoining Rose Cottage policy HTA 1: Development Boundaries.</p> <p>Our question is why is the boundary to be where the council have proposed? Why can't the boundary go in line with Mr Rescorlas said boundary which would go across our land to the gateway. OR the proposed boundary could start at the end of our land why has our land been subject to this boundary?</p> <p>I fully understand that boundaries have to be put in place but the 'red development' line on the proposed boundary isn't even in the right place as Mr Rescorlas plot has been omitted so it's actually not shown to be true.</p> | <p><b>Parish Response:</b> The concerns raised by the landowner refer to development opportunities on a specific piece of land. Information on the planning history of this site and the reasons provided by the Parish Council, Cornwall Council and an independent Appeal examiner for declining the landowners previous applications to develop this site are provided below.</p> <p>It should also be noted that the role of the Parish Council in the planning system is merely advisory, as a consultee, and their advice relates to the long-term interests / concerns of the Parish as a whole. It is the Planning Department who make the decisions based on the validity of each planning application and they often override the advice of the Parish Council.</p> |



This 'red line' also includes a field in Grove Lane? And recently numerous builds have gone up outside of the 'red line' please explain.

I found about this said boundary proposal approximately a week ago when I was having an informal 'social distanced' chat with Mr Rescorla and apparently the preparation for this proposal has been in place for over 2 years but now appears to being 'rushed' through to be in place asap.

Why as the land owners were we not informed of this proposal by letter or email at any point over the last two and a half years? Putting something up on a website is just not good enough. We do not randomly look at a parish council website.

We have lived in Perran Downs for 23 years and in this time have seen large houses being built around our property with no objection and allowing people to go about their day to day business. Please see attached archive photo.

However, it's very sad that people can't do the same for us. I could list numerous times of reports to the council through one thing or another, but my email is about the proposed boundary.

We have tried for planning on a section of our land and have been meet with negativity and now your proposed boundary just adds to it. Could this be the reason why this boundary must be put in place to stop new development outside of the boundary lines.

Why does it seem to us that our land appears to be such a problem to the parish council, but others seem to have no problems.

It certainly appears there is one rule for one and another rule for some others?

The Neighbourhood Plan (including the Development Boundaries) has been developed through a consultative process over the last 5 years, publicised in a variety of ways, through events, posters, leaflets, meetings, Facebook and other social media sites, as well as on the Parish Council and dedicated NDP websites. It has not a process that been rushed, and it is unfortunate that this individual has not engaged in the process.

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| <p>Development Company for Client land owner</p> |  | <p>Are there boundaries going up all around Perran Downs or just around our land? It would be of interest to know how other houses can be built. As we write this email in Red Lane there are 2 new builds underway. And a very large house in a field at the end of Perran Downs lane seem to have no problems being built. Maybe these slipped under those 'boundary radars'.</p> <p>We have had a meeting with the MP Derek Thomas and aired our views which he took onboard. As I said to him it appears 'who you know in these situations, not who you are'</p> <p>We would like the development boundaries redrawn, and an alternative policy for a settlement boundary.</p> <p><b>An additional letter was submitted by a Development Company on behalf of their Client</b></p> <p><b>Representations to the DRAFT for 'Pre-submission Consultation' under Regulation 14 of the NDP Regulations 2012 – Perranuthnoe Parish Neighbourhood Development Plan 2020-30.</b><br/>Land East of Rose Cottage at Grove Lane, Perran Downs, Golsithney, TR20 9HN</p> <p>1.0 Introduction<br/>We write on behalf of our client Mr E Grey, with regard to the parcel of land Eastern of Rose Cottage of the settlement of Golsithney as highlighted below, having regard to the emerging policies in the DRAFT for 'Pre-submission Consultation' under Regulation 14 of the NDP Regulations 2012 – Perranuthnoe Parish Neighbourhood Development Plan 2020-30 (the NDP).</p> | <p><b>Parish Response:</b></p> <p>The representations made by the Development Company on behalf of their client relate to an area of agricultural land and open countryside located within the World Heritage Site (WHS) between the settlements of Perran Downs and Rosudgeon.</p> <p>They seek to have the Perran Downs Development Boundary extended to include their area of land, which is bounded by Well Lane and Perran Downs Lane. This area of land has been subject to a series of planning applications for residential development over recent years.</p> <p>These applications have not been supported by Perranuthnoe Parish Council on the grounds that the land in question is not infill, it is an unacceptable extension of building into undeveloped countryside, well removed from the existing build up area and unmistakable rural thereby harming its intrinsic character and beauty. This would conflict with policies 1, 3 and 7 of the Cornwall Local Plan and with the aims and intentions of paragraphs 7 and 17 of the National Planning Policy Framework.</p> <p>Cornwall Council also declined the previous application made by the applicant for development of this area on the</p> |
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## 2.0 Submissions

Over the following pages we wish to make our submission in response to specific sections in the NDP. For ease of reference we have copied the relevant text from the NDP, with the relevant paragraph numbers, as highlighted in bold and italics below, and thereafter provided our submission in response.

*3.13. Settlement / Development Boundaries have been a staple feature of local development plan documents in Cornwall over recent years whereby the ‘development’ or ‘settlement’ boundary is used as a housing policy marker. Inside the boundary is where market-led housing is focussed; development outside the boundaries is only permitted for ‘exception sites’. The Parish has decided to use the term ‘Development Boundary’ rather than ‘Settlement Boundary’ due to the fact that there was concern locally that the term and implications of the defined boundary lines. The delineation of ‘boundaries’ is not intended to map the outline of existing settlements, but*

grounds that the site is located outside of the settlement of Perran Downs. They concluded that: the proposed development does not represent infill or rounding off in accordance with Policy 3 of the Cornwall Local Plan Strategic policies 2010 to 2030. The development represents an undesirable extension and intrusion of the settlement into the adjoining countryside which, without any special justification, would, as a consequence of the prominent site location be harmful to the rural character and appearance of the countryside. The proposal thereby gives rise to a fundamental conflict with planning policy, which does not permit new residential development outside of defined, well serviced settlements. The development thus conflicts with policies 1, 2, 3, 7 and 23 of the Cornwall Local Plan (Strategic Policies) 2010-2030 and with the aims and intentions of paragraphs 7, 14, 17, 55 and 61 of the National Planning Policy Framework 2012.

The decision by Cornwall Council to refuse the application was backed by a planning appeal decision on 17/9/2018 (APP/D0840/W/18/3198406 17/9/2018). The planning inspector decision letter specifically commented that: *‘When approaching along Perran Downs Road from the south, and around the crossroads, the appeal site is partially visible through the boundary screening and gateways. It contributes, with surrounding fields, to the rural character of the area. The existing dwellings at Perran Downs are largely set within or screened by trees and there is a clear character distinction between the open fields and the built-up areas. The appeal site, although close to the adjoining built development, is largely screened from it and visually appears to form part of the countryside in this location.*

*Due to this visual separation by the established boundary screening from the properties in Well Lane and the adjoining buildings in the wider area of Perran Downs, the appeal site has a greater affinity and visual connection with the adjoining open fields. Even if I was to be persuaded by the appellant’s argument that the site falls within a single dispersed settlement, the appeal site has the character,*

*rather to provide clear policy guidance as to where new building development should be located; the 'development boundary lines' then outline the area within which it will be appropriate to locate new infill development, as outlined in NDP Policy HTA 1.*

*3.14. The identification of 'development boundaries' in the Parish has been achieved through a consultative process, informed by the assessment of relevant data, plans and policies. The Cornwall Local Plan and associated documents provide important policy guidance. The Shoreline Management Plan and associated NCERM data provided key information and guidance relating to erosion rates along the coastline, which subsequently informed delineation of the coastal edge of development boundaries for the settlement of Perranuthnoe village.*

*3.15. An initial assessment of the Parish's minimum housing requirements was undertaken, to enable the Parish to understand its requirements, and so that we would be able to ensure that adequate land is allocated within the development boundaries to meet CLP obligations. The assessment found that due to the fact that Parish lands are either designated as part of Cornwall's Area of Outstanding Natural Beauty (AONB) or within the World Heritage Site (WHS), the Parish is exempt from any specific requirement to build new housing. Housing data for this Parish demonstrates however that despite the AONB and WHS protection, a significant number of houses have been built and committed to over the last 10 years, indeed the Parish has the third highest development level for the West Penwith Community Network Area, on a par with the largest Parish in Cornwall.*

*3.16. The settlement boundary assessment started with mapping exercise to chart the built up area of the main settlements. This excluded sporadic development and large gardens, particularly those that protrude into open countryside, and included assessment of the edge of*

*together with the remainder of the adjoining field, of open countryside.*

*Consequently, development in this location would constitute incremental growth and visually extend buildings into land that has the character and appearance of open countryside. The presence of the two new dwellings, the associated driveways and parking spaces, the formation of residential amenity areas and the related domestic paraphernalia, would add a significant built form to the site and create a more suburban appearance. This would cause visual harm eroding the rural character and appearance of the site and would be contrary to the approach set out in Policy 3 and the supporting text which seek to prevent encroachment of development into the countryside.'*

The reasoning previously provided by the Parish Council, Cornwall Council and Appeal Inspector will hopefully help to respond to the landowner and Development Company's queries and to explain why this land does not represent 'rounding off'.

The proposal to include this area within the Perran Downs Development boundary was not supported during the public consultation process. A number of residents indicated specifically they valued the open countryside between Perran Downs and Rosudgeon which they wished to remain undeveloped. There has been strong support for the Development Boundaries proposed in the NDP.

The Parish has significant new housing already approved or developed within the plan period and there is no evidence of the need for the inclusion of additional land within the Perran Downs Development Boundary Furthermore it is noted that whilst the area of land is small, any additional homes contributed would not outweigh the damage caused to the local landscape environment. If further homes were indeed required it is felt that other less damaging sites would be preferable.

*settlement character changes. It showed four core settlement areas in Perranuthnoe Parish: Goldsithney, Rosudgeon, Perran Downs and Perranuthnoe village. The Parish Steering Committee subsequently undertook a series of consultations on the results of the assessment, including a number of mapping exercises, to delineate development boundaries which will meet local housing needs, whilst also working to conserve the valued character of designated AONB and WHS landscapes, maintain the identity of the communities living in settlements and hamlets, and conserve and enhance valued community assets and facilities. The results of this consultative and factual research process have informed design of our NDP Policy HTA1.*

Firstly, as a starting point, we completely disagree that the boundaries have been arrived through a consultative process. We as landowners have not been notified in this regard, otherwise we would have made earlier representations. The subsequent text appears to suggest that this consultative process, was in fact a desktop review, we have no idea what the 'series of consultations' to which paragraph 3.16 refers too actually involved, we were certainly not aware.

Nonetheless, it is pretty clear from the text above that the approach to defining these boundaries has been led by a negative mindset to prevent development from taking place. The starting point appears to have been to look at what are referred to as 'requirements' for housing numbers. It has to be stressed that the housing number for the parish, is not a 'requirement' but a 'minimum target' as per policies 2 and 3 of the Cornwall Local Plan 2010-2030 (the CLP), is should therefore not be treated as a ceiling figure, as appears to be the case here, but as base figure. Thereafter the text simply refers to various ways of constraining potential growth, that being the housing growth that is in so much demand in this parish, Cornwall and across the country.

**Conclusion:** No evidence has been provided of the benefits of including this land area within the Development Boundary. Indeed, there is clear planning case history, (in the decisions made by the Parish Council, Planning Department and subsequent Appeal Judge in 2018), that this land is not suitable for development, and that development on this site would have an unjustifiable negative impact on landscape character.

The reference made by the Development Company here to the Appeal decision APP/D0840/W/16/3162355 at Land North of Mountlea Drive, Par PL24 2EL, where a development of approximately 103 dwellings was permitted on the edge of a settlement is not relevant to this site. Of direct relevance is the Appeal Inspector's assessment and decision for this specific site (under APP/D0840/W/18/3198406). He concluded that development on this site would not be appropriate, does not align with planning policy and does not represent 'rounding off'. It 'would cause visual harm eroding the rural character and appearance of the site and would be contrary to the approach set out in Policy 3 and the supporting text which seek to prevent encroachment of development into the countryside.'

#### **Perranuthnoe Housing Statement – Parish response**

Use of the wording 'requirement' in the title, follows the template on provided by Cornwall Council Planning Department in their Housing Statement Guidance Part 1 (refer: <https://www.cornwall.gov.uk/media/o0jildaf/housing-statement-guidance-part-1-ndps-housing-target.pdf>)

In their critique of the Plan, the Development Company makes much of the use in the Housing Statement of the word 'requirement'. This is not terminology / an 'approach' which the Parish has established; it is purely following the guidance provided by Cornwall Council who give the template for under the heading ' Delivering the Parish Housing Requirement' (refer page 4 of the above Housing Statement link)

The approach to defining the settlement boundaries is therefore in conflict with the presumption in favour of sustainable development, (as it is a presumption against), contained within the CLP and the National Planning Policy Framework (the NPPF).

*4.5. Although there is not any requirement for Perranuthnoe Parish to allocate further land for housing, the NDP seeks to facilitate the delivery of appropriate housing, where there is a proven local need by Parish communities, and where this does not impact on the outstanding natural beauty and heritage character of designated AONB and WHS areas of the Parish. The NDP policies in this document provide the guidance to achieve this.*

Its not a requirement, it is a minimum figure, there is no conflict with the CLP and the NPPF with development exceeding the minimum figure. By placing a restriction that any development that exceeds the minimum figure should only be required to meet local needs, is entirely inconsistent with the CLP and the NPPF. Further we would stress that the recent Government announcements, and the standardised housing figure approach, is likely to increase the housing figures in Cornwall approximately twofold. The NDP, if it maintains the approach highlighted, will be out of date with national policy before it is even adopted.

*Figure 20 and Policy CW3: Local Green Space (LGS)  
The areas outlined in Figures 20 and 21 below have been designated for protection as 'Local Green Space' (LGS), in recognition of their significant value to Parish communities. These areas should be conserved as green space, with a strong priority placed on preserving the attributes that make them special<sup>36</sup>; Development should not be permitted within Local Green Space areas, unless it can be clearly proven that there are very special circumstances.*

The text in this section explains in some detail that although the Parish has not been allocated a minimum housing target, it has provided one of the highest levels of housing development in the CNA. Quite the opposite of what is being implied here by the Development Company; the NDP starts from the position that the Parish has provided extensive housing over the last 10 years, and intends to meet local housing needs.

The NDP Housing Statement does not state, as implied by the Development Company's comments, that the Parish is 'placing a restriction that any development that exceeds the minimum figure should only be required to meet local needs'. This Parish does not have a 'minimum housing requirement / target' due to the fact that almost all of the land within it, is located within either the AONB or WHS. If the Parish was aiming to restrict development to the CNA minimum figure, as the Development Company are implying, there would be no housing built in this Parish at all! Quite the opposite has happened in that this Parish has contributed the third highest % of housing in the West Penwith CNA.

The Parish is very aware that '0' is not a housing 'figure' or 'target' and there is no text in the NDP which in any way implies that it is.

The concern arising from local consultation for the NDP is that housing development over recent years has not been well planned, has resulted in ad hoc ribbon development and the loss of lands and landscapes that are valued. Currently development is not working effectively to meet housing needs, or to respect protected landscapes.

The NDP Parish Housing Statement is merely presenting the results of the consultative process over the last 5 years. This indicated that a strong priority over the life of the Plan, should be placed on providing housing to meet local needs, including affordable housing.

While the Parish understands that a stronger focus on meeting housing needs may be to the disadvantage of commercial development companies and their clients, the

*In cases where planning applications are submitted for areas adjacent to LGS, substantial weight should be given to consideration of the potential impact of the proposed development on the LGS, and on peoples' enjoyment of it. Any development or land-use change that is proposed adjacent to a designated LGS area should not compromise its current or future use, and should be of a scale and character that will complement the valued qualities of the LGS. A more detailed description of the designated LGS areas is provided in the LGS audit forms in Annex 4 and should be referred to for information on their special attributes.*

*The LGS meet a range of community needs and form a core part of the overall green infrastructure of the Parish. An ecosystem services approach<sup>38</sup> should be taken to support sustainable development planning in this Parish, in which decision-making on planning applications that may affect LGS, or areas connecting into LGS, takes account of the importance of interconnectivity between LGS and other green areas in the Parish.*

*Where the reasons for designation of the LGS include the views from it, and the character of the landscapes surrounding it, protection of these valued qualities, and of the public visual amenity value associated with the site, should be a priority consideration in decision-making on planning applications that may affect the site. Where a proposed development may impact on the public visual amenity value of an LGS, the Parish encourages the use of Landscape and Visual Impact Assessment (LVIA) at an early stage in the development conceptualisation process. The LVIA should then be submitted with the planning application as it will provide important information for decision-makers and will help to demonstrate how the proposed development complements the Parish landscape in which it is located, and respects the valued qualities of the LGS.*

*POLICY CW3 Local Green Space*

NDP has to focus on achieving development that has a long term beneficial impact for the Parish as a whole and is developed through a broad consultative process, so represents the results of that process.

#### **Local Green Space - Parish response**

It is important to clarify here that the land in question in this letter, is not designated as Local Green Space. The statement that the company makes 'It appears our land is proposed to be designated as a Local Green Space (LGS)' is not correct. We would ask that they refer to the LGS maps associated with Policy CW3.

The consultative assessment and auditing process used by the Parish for identification of areas to be designated as Local Green Space is outlined in the Neighbourhood Plan document Section 3, with further detail provided in the LGS Annex appended to the Plan. This includes audit forms for each site. The Justification and Evidence base for Policy CW3 explains the alignment with national and county guidelines and NPPF selection criteria.

The Parish is disappointed by the somewhat unpleasant and aggressive wording used in some parts of the development company's correspondence. In particular where the development company refers to the consultative process and assessment as 'high level waffle'. We would hope that moving forward it is possible to ensure that any correspondence is made in a more considered manner. The Parish remains open to consult further on any issues of concern to their client, it is hoped that the company will reconsider its stance and be open to further discussion and consultation.

#### **Development Boundaries – Parish response**

As outlined in the NDP, the identification of Development Boundaries was achieved through a consultative process, based on a professional assessment undertaken by Cornwall Council Planning Department. Cornwall Council and the Parish have used clear, nationally recognised criteria and approach to guide this process. The Regulation 14

*Intent: This policy aims to provide clear guidance to support development planning that recognises and protects the qualities of green areas that are of special significance to local communities. These areas are designated as Local Green Space (LGS). The reasons for designation and the community functions that the LGS provide are varied, with areas identified through a consultative assessment and audit process. LGS are integral to the overall green infrastructure of this Parish and are important to long-term community health and wellbeing. This policy does not attempt to identify every green area of importance to local communities; it should be used alongside other policies in the NDP to ensure that sustainable development planning adopts an ecosystem services approach that recognises the importance of green infrastructure to long-term community welfare*

*Justification and Further Information: Why we need this Policy and how it aligns with higher level Plans and Frameworks Public consultation highlighted the importance of a range of green spaces for community health and wellbeing, as part of the green infrastructure of this Parish. The significance of these areas, and the reasons they are valued varies, and includes for recreation, sport, social interaction, growing food (allotment areas), their heritage significance, educational value, natural beauty and 'sense of place', importance for wildlife, visual amenity, tranquillity and open space characteristics, and as inspiration for art and photography. Many areas are valued for a combination of these elements. A consultative assessment and audit process was used to identify priority areas for designation as Local Green Space, and their valued attributes. Annex 4 provides further detail on the LGS assessment process and the results of that assessment.*

*The results of public consultation pointed to significant local concern over the current impact of development, and potential future impact of development, on valued areas of local green space, and on people's use and enjoyment of*

consultation process is a continuation of this overall consultative approach.

Consultation to consolidate appropriate 'development boundaries' was undertaken in 2018 & 2019 and this current pre-submission consultation is a continuation of that process. It is unfortunate that the Development Company's client did not engage in this process at an earlier date, and it is a surprise that he was not aware of the process as it was widely advertised. The NDP consultation process was widely publicised and there was extensive engagement by community members across the Parish. The Parish Council did not contact every land-owner and resident individually, as this would have been an extremely time consuming and costly process and it does not have the resources to do so; it is also not standard practice for neighbourhood planning.

We would strongly contest the rather aggressive comment made by this Development Company that that the process 'has been led by a negative mindset to prevent development from taking place.' On the contrary, we would stress that the process has been led by a positive, consultative process and mindset, based on professional assessment, and has received broad support and positive feedback from the Parish. The focus of the NDP and of the Development Boundaries is on achieving a positive long term pattern of development and growth for the Parish, providing housing to meet local needs and respecting protected AONB & WHS landscapes and assets.

The 'NPPF presumption in favour of sustainable development', is well recognised and respected, but it is unfortunate that it is sometimes interpreted as a universal licence to build anything anywhere by some Development Companies. In development planning, it is important that the broader NPPF and CLP policy framework is understood and applied. Of particular relevance to this Parish are policies relating to AONB and WHS which guide how and where development is appropriate, and how to ensure it is sustainable. The Parish NDP provides maps and information



*these areas. There is currently nothing that identifies or delineates green areas of core importance to local communities, or the qualities of these areas that makes them special. There was concern that currently decision making on planning applications is being made without the local information and knowledge necessary to achieve positive, long-term planning that will work to conserve green areas of key importance to Parish communities for current and future generations. The NDP was seen as an opportunity to fill this vacuum, in order to provide clear local policy guidance that identifies, delineates and protects green areas of core community significance.*

*The results of public consultation pointed to the need for a Local Green Space policy that will help to ensure that decision-making on development proposals works to both conserve key areas, and protect the valued qualities of these LGS areas. Where areas are valued for their natural beauty and 'sense of place', open space characteristics and the iconic views of AONB or WHS landscapes from them, there was a strong feeling that decision making on planning applications should include assessment of the potential impact of development on the valued character of landscapes visible from the LGS. This was emphasised as important so as to make sure that development in the broader area does not damage the valued characteristics of the landscapes viewed from the LGS i.e. the 'public visual amenity value' of the site'. Although these should receive a level of protection through their designation under AONB and WHS, there was a strong public feeling that currently the level of consideration given to protection of AONB and WHS landscape character in planning processes appears to be fairly limited, with numerous examples of recent development that has had a negative impact on AONB and WHS landscape character and on areas of core importance to local communities. The interconnection of LGS areas within the overall green infrastructure of the Parish also came out as an issue of importance, and the need for a planning approach that*

on which areas are designated as AONB and WHS landscapes.

*recognises this. This is included in the above policy but dealt with more specifically under NDP Objective 4.*

*All of the areas designated for protection as Local Green Space in Figures 20 and 21 meet the criteria outlined in paragraph 100 of the National Planning Policy Framework (NPPF) and the associated guidance provided by Cornwall Council: All proposed LGS areas are:*

- in close proximity to communities*
- demonstrably special to the local community and hold particular local significance*
- local in character and all sites are significantly smaller in size than the 20 hectares*

*Cornwall Council / Natural England recommend as a maximum for local green space areas.*

It appears our land is proposed to be designated as a Local Green Space (LGS). Whilst there is a lot of text above, and reference to consultation, we have not been notified about this proposal despite being the land owners. It is worrying that the pre-amble and the policy provides a lot of high level reasoning, without providing any justification for the specific allocations of each site, why does our site meet the tests referred to in paragraph 100 of the NPPF? In what way can our site be described as 'demonstrably special to the local community and hold particular local significance'? You can just allocate land without providing the detailed evidence base to justify it. The policy is completely flawed, and its justifications are hidden behind a lot of high level waffle that is absolutely meaningless to the actual tests in paragraph 100 of the NPPF.

*POLICY HTA 1: Development Boundaries  
Policy Intent: By establishing clear development boundaries, the Parish aims to maintain cohesive, geographically bounded settlement areas, and to prevent further 'development sprawl' out from existing settlements and hamlets. The establishment of development boundaries within this policy provides clear guidance as to*

*where housing development should be focussed. It will help to ensure that the Parish is able to meet local housing needs whilst safeguarding the distinct identity of villages, hamlets and their communities, and protecting against further ribbon development or coalescence between villages and hamlets, and the negative impact this has on the cohesiveness and identity of local communities and the landscape character of the Parish.*

*Policy HTA 1: Development Boundaries*

*The Development Boundaries outlined in Figures 23 to 26 show the areas of the Parish within which new building development will be permitted. Within these Development Boundaries, infill development of one or two houses will be supported, where it conforms with other policies in this NDP, contributes positively to the local character of settlements and to the welfare of the communities that live there.*

As we have already highlighted, the approach to the development boundaries has been led in a manner to restrict/ prevent development and has been approached in a negative mindset, rather than the permissive approach in the CLP and the NPPF.

From reading the extensive text in support of this policy, there is continued reference to various constraints, but absolutely minimal reference to actual approach to which the settlement boundary should be appropriately defined, that being as referred to in policy 3 of the CLP and its supporting text. I.e. the boundaries should be informed by the approach to housing distribution in the CLP, which includes 'infill'; 'rounding off'; and 'previously developed land', where is the assessment of these definitions in the approach to the settlement boundaries? Again, the approach to defining these boundaries is flawed in the context of the CLP and the NPPF for which the NDP is required to align with. For note, Paragraph 1.68 of the CLP explains that 'Neighbourhood Plans can provide

detailed definition on which settlements are appropriate for infill and boundaries to which the policy will operate.'

Having regard to our site, we submit that the site clearly falls within the definition of a 'rounding off' site as supported by the CLP and the accompanying Chief Planning Officers Advice Note on Infill/ Rounding Off (the Advice Note), for which the NDP does not appear to reference. The latter of which explains as follows:

*Rounding off*

*After considering the policy stipulation about scale, a key consideration is rounding off. Rounding off provides a symmetry or completion to a settlement boundary, it is not intended to facilitate continued incremental growth. When making a judgement on rounding off, the decision maker needs to review the settlement and the surrounding area by visiting the site as well as reviewing maps and photographs to understand where the physical and logical boundaries of the existing settlement are. Rounding off development should not visually extend development into the open countryside and should be predominantly enclosed by edging features. The boundaries of some settlements can be irregular and edges can include lower density development, large gardens that are important to the character and setting of the settlement and previously developed land. A judgement will be required on a case by case basis whether a site has the appearance of being within the physical boundaries of that settlement.*

*The presence of definite boundaries, landscape features, the history and nature of the land, whether it is despoiled, degraded, derelict or contaminated, existing development and topography will be important considerations in this respect.*

*Proposals must be adjacent to existing development and be contained within long standing and enclosing boundary features, for example, a road, Cornish hedge or stream. Suitable sites are likely to be surrounded on at least two sides by existing built development.*

*Development resulting in the creation of a further site for rounding off is unlikely to be rounding off in itself.*

*In contrast, Policy 9 (Rural exceptions sites) is not restricted to this enclosed site characteristics.*

In accordance with the above, our site is enclosed by edging features on all sides, including built development on two of these. The site is adjacent to the settlement of Goldsithney, and due to the presence of existing building form in the immediate context, it quite clearly will not extend development into the open countryside. It does not represent a rural exception site, as it has enclosed characteristics.

As confirmed in the Appeal decision APP/D0840/W/16/3162355 at Land North of Mountlea Drive, Par PL24 2EL, a development of approximately 103 dwellings, on the edge of a settlement was in accordance with the approach in the CLP to 'rounding off' development. We also flag up this appeal on the basis that the approach in the above policy to limit development to one or two dwellings only, is entirely inconsistent with the CLP, not in having regard to the scale, services and facilities of Goldsthney.

With regard to his approach in reaching this view, the following sections of the appeal decision are highlighted for reference. As is our submissions, which are with regard to a much smaller site, we consider the points pertinent to our case that our site is a 'rounding off' site, and should therefore be included in the settlement boundary:

*13. LP paragraph 1.68 gives us a definition of rounding off: This applies to development on land that is substantially enclosed but outside of the urban form of a settlement and where its edge is clearly defined by a physical feature that also acts as a barrier to further*

*growth (such as a road). It should not visually extend building into the open countryside.*

*14. The appeal site is predominantly pasture but is bounded to the north and east by existing housing and to the west by the existing Kingdom Hall. To the south, the site fronts on to Mountlea Drive, behind substantial hedge banks, interrupted by the built form of the Trenovissick Farm complex. On that basis, the site, while currently undeveloped, is substantially enclosed, and its southern edge is clearly defined by Mountlea Drive.*


*15. LP paragraph 2.33 defines open countryside as the area outside of the physical boundaries of existing settlements (where they have a clear form and shape). From what I saw, because of the presence of development on three sides, the substantial physical presence of Trenovissick Farm, and the nature of Mountlea Drive and the boundary treatment the appeal site presents to it, the appeal site has the appearance of being within the physical boundaries of the existing settlement. It is not open countryside in the way the LP defines it, therefore. On that basis, development of the appeal site would not visually extend building into the open countryside.*

*16. Turning back to LP Policy 3, while the proposal is relatively significant in terms of house numbers, and the size of the site, it lies adjacent to a substantial settlement, and there is nothing convincing before me to suggest that the proposal is not appropriate to the size and role of that settlement.*

*17. On that overall basis, it is my conclusion that the proposal comes under the ambit of rounding off and, as a consequence, complies with LP Policy 3*

5.0 Conclusion

|   |                                  |  |  |
|---|----------------------------------|--|--|
|   |                                  | <p>We strongly object to the proposal to designate our site as a LGS and we submit that the site should be included within a defined settlement boundary.</p> <p>We await your response to our submissions, and will further review the NDP as it evolves.</p>   |  |
| <p>Development Company for Client Landowner</p> | <p>Policy CW 3<br/>And HTA 1</p> | <p><b>Representation Submitted by Development Company on behalf of their Client</b> regarding proposed Local Green Space Area J adjacent to Goldsithney</p> <p>(Note: The letter submitted by the Development Company for this client is identical in wording to that which the Agency submitted for their other client (above), except for the section of the letter relating their client's land on the north-eastern edge of the settlement of Goldsithney, between Goldsithney and the hamlet of Nanturras, and objection to its proposed inclusion within LGS Area J.</p> <p>The following is the text of the representation regarding this piece of land.</p> <p><b>Representations to the DRAFT for 'Pre-submission Consultation' under Regulation 14 of the NDP Regulations 2012 – Perranuthnoe Parish Neighbourhood Development Plan 2020-30.</b></p> <p>1.0 Introduction<br/>We write on behalf of our client Bampfylde Bryant, with regard to the parcel of land on the north-eastern edge of the settlement of Goldsithney as highlighted below, having regard to the emerging policies in the DRAFT for 'Pre-submission Consultation' under Regulation 14 of the NDP Regulations 2012 – Perranuthnoe Parish Neighbourhood Development Plan 2020-30 (the NDP).</p> | <p>Given that the letter submitted by the Development Company for this client is identical to that submitted for their other client, we would ask that you refer to the Parish response above.</p> <p>The Parish provides the following response in relation to the representation made against the proposal to include the client's land on the north-eastern edge of the settlement of Goldsithney within Local Green Space Area J.</p> <p>The area of land in questions is a stretch of agricultural land forming a green open space between the village of Goldsithney, the hamlet of Nanturras and the nearby village of St Hilary. It comprises small fields, Cornish Hedges and woodland, with footpaths passing through it. The field is part of Local Green Space Area J, an area identified by local communities as being of particular value to them as open green space. The Audit Form for Area J can be referenced within the Annex and outlines why the area is considered to be of special community value. It also outlines the consultative auditing process used to identify LGS. This area of land also performs an important role as a green corridor between surrounding built-up areas, maintaining interconnectivity between natural habitats, and important to the green infrastructure of the Parish. It previously formed part of the Penwith Protected Land Area (please refer to the Local Landscape Character Assessment for Perranuthnoe Parish Maps 2 and 10.).</p> <p>The Neighbourhood Plan Development Boundaries have been developed through professional assessment and extensive consultation. The request by the Development Company and Landowner to include this land within Goldsithney Development Boundaries would result in</p> |

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|  |  |  <p data-bbox="577 566 1294 662">'We strongly object to the proposal to designate our site as a LGS and we submit that the site should be included within a defined settlement boundary.'</p> | <p data-bbox="1321 159 2083 351">coalescence between the village of Goldsithney, hamlet of Nanturras and settlement of Perran Downs. This would run directly counter to the objective of NDP Policy HTA 1 and NDP Policy CW3, and would conflict with the findings of both the settlement boundary assessment and the results of public consultation.</p> <p data-bbox="1321 383 2083 638">No clear evidence or justification has been provided by the development company to support the inclusion of this land within the Goldsithney Development Boundary. The site does not meet the definition of a 'rounding off' site or 'infill'. The comparison made with an Appeal decision made for a development of approximately 103 dwellings on the edge of Par settlement, near St Austell is not appropriate to this context.</p> |
|--|--|---|--|

| <b>Company Land Owner Representation requesting inclusion of an area of their land within Goldsithney Development Boundary</b> |  |  |   |
|--|--|--|---|
| <p data-bbox="168 829 324 893">St Aubyns Estate</p>  | <p data-bbox="358 829 548 1157">HTA 1<br/>Specific reference to a site and request for it to be included with Goldsithney Settlement Boundary.</p> | <p data-bbox="571 829 1276 1220">Please see attached Letter for full details:<br/>The comments included within this representation largely focus on the housing policies, with specific regard to the proposed settlement boundary for Goldsithney.<br/>Our client is not opposed to the principle of the draft NDP and the concept of defining settlement boundaries for the Parish to control inappropriate urban sprawl into the countryside. That said, the NDP should be used as a positive tool to guide appropriate development and cater for suitable levels of growth over the plan period (2020-2030).</p> <p data-bbox="571 1236 1276 1420">Specific request for a site comprising of just over 3.5 hectares located towards the west of Goldsithney, adjacent to the B3280 to be included in the Development Boundary. It is made up of one field bounded by hedgerows – there are some existing mature trees in the hedgerows. The larger field is an irregular in shape with</p> | <p data-bbox="1299 845 2072 1109">The area of land which St Aubyns Estate propose for inclusion within the Goldsithney Development Boundary is a large area of actively farmed open countryside within the WHS, close to the edge of Goldsithney between the B3280 and South Road. If developed it would push the settlement towards Marazion and to a lesser extent Perranuthnoe. It is land which rises from Goldsithney and a development of the scale proposed would be highly visible from a number of directions.</p> <p data-bbox="1299 1141 2072 1396">The area suggested is 3.6 hectares which is large area that would significantly increase the size and population of Goldsithney to approaching a small town without the infrastructure or amenities to support it. During the public consultations, there was significant public support for the proposed Goldsithney development boundary which excluded this large area, and concern about any further expansion of Goldsithney.</p> |



|  |  |   |
|--|--|---|
|  | <p>a Public Right of Way running through the centre. The site is bounded on its north-eastern side by the rear gardens of housing in West End (B3280) and South Road. St Piran's Village Hall and play area is located on South Road adjacent to the site.</p> <p>A map is provided</p> <p>Justification for including the site in the Development Boundary is given as follows:</p> <p>'Developing the site for housing, whilst providing an element of affordable housing could bring benefits to the entire community, not just those in affordable need. Such benefits include improving the footpath route back to Marazion, as well as enhancing the open space provision on offer, and including new equipment for all ages. A high-quality design could also be achieved using traditional Cornish materials, whilst carefully considering the constraints of the site in terms of the World Heritage Site and the setting of the adjoining Conservation Area. All the cited aspirations and more, could be achieved by an appropriately worded policy relating to the site.</p> <p>On the contrary however, draft Policy HTA3 of the Perranuthnoe NDP sets a maximum of 10-dwellings and as a result, it is unlikely that this site would ever be policy compliant, or appropriate for development under the current terms. Even if the cap of 10-dwelling were to be removed, concerns still exist over the quality of a development given the constraints of the site and where inevitably, the wider community aspirations would not be accommodated for viability reasons.</p> <p>Conclusion</p> <p>It is evident that this site should be included within the settlement boundary for Goldsithney as it clearly relates to the existing settlement in a sustainable position where rounding-off development would ordinarily be supported as set out above. Only a draft NDP or NDO that meets each of a set of basic conditions can be put to a referendum and be made. The basic conditions set out in</p> | <p>Residents noted with some concern that developments on the edge of Marazion have already had the effect of bringing the two settlements closer together. Residents also advised during the consultations that the public footpath which cuts through the agricultural land is regularly used and highly valued, allowing relatively close access to open countryside from Goldsithney village through Cornish hedges and provides a near traffic free pedestrian route to Perranuthnoe. The area incorporates rising land very visible from South Road and West End B3280.</p> <p>As part of the extensive public consultations, many residents expressed the view that the Parish has had too much development over recent years with evident pressure on local amenities and increased traffic. The Parish has significant new housing already approved or developed within the plan period and therefore additional land of this scale is not required. If such a scale of development was required in the future (post 2030) in a new plan period, major investments would be required in local infrastructure to support the increase in population.</p> <p>Members of the NDP Steering Group met with St Aubyns estate and explained the rationale behind the Goldsithney Development Boundary, local opposition to any further significant expansion of the village of Goldsithney and the issues which development on such a scale would present for the Parish. The Steering Group offered St Aubyns Estate the opportunity to provide additional evidence / arguments to support their proposal, and for any additional information submitted by the Estate to be presented at the NDP consultation event in November. St Aubyns Estate were also invited to attend that Consultation Event.</p> <p>Overall, there was positive discussion at the meeting, with all present listening to the points raised by others. St Aubyns Estate did not provide any further information or attend the NDP Consultation Event. The Steering Group have the impression from the meeting that St Aubyns Estate understood the reasons why the Parish feel that it would not be appropriate</p> |
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|  | <p>paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004 and contain a conformity test as described below:</p> <p><i>e. the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).</i></p> <p>In this case, the settlement boundary for Goldsithney has been drawn extremely tightly that excludes an area of land that has development on two sides, which in usual terms, could be supported as rounding off development. Because of the exclusion of our client's land, rounding off development would no longer be able to be considered as part of Policy 3 of the Cornwall Local Plan Strategic Policies 2010-2030. As a result, there is a clear conflict between the drawn settlement boundary for Goldsithney and Policy 3 of the Cornwall Local Plan Strategic Policies 2010-2030 because they do not conform with one and other. On behalf of our client, we respectfully request that the settlement boundary is amended as drawn on the plan accompanying this letter.</p> | <p>to expand the Goldsithney Development Boundary on such a large scale during the lifetime of this Plan. It was agreed that the proposal will be put 'on the table' in discussions for any extension to Dev Boundaries in the 2030 – 40 NDP.</p> <p><b>Conclusion:</b> There are strong planning policy grounds to maintain the existing Goldsithney Development Boundary, and there is strong community support for it. The NDP Development Boundaries have been developed through professional assessment and extensive public consultation. To change the Development Boundary in order to include the 3.6ha land area proposed by St Aubyns Estate would represent a significant change to the village of Goldsithney and this would conflict with NDP policy HTA1, HCA1 and EB2. There is no evidence of the need for additional housing on this scale, within the lifetime of the Plan, local amenities would not be adequate to support it, and to do so would run counter to community priorities as expressed throughout consultative process for development of this Plan.</p> |
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## APPENDIX 6: Examples of Surveys, Consultation Material and Events

### Scoping Survey Consultation Results

#### Priority issues emerging from survey results

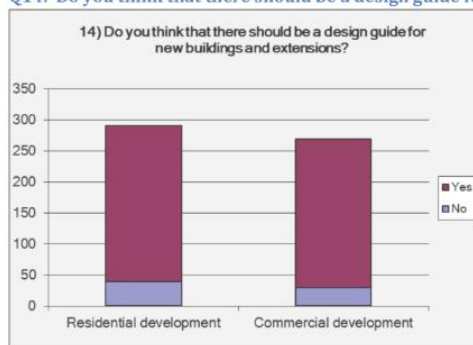
##### Q4. Which aspects of Perranuthnoe would you like to see conserved?

| 4) Which aspects of Perranuthnoe Parish would you like to see conserved? |                  |                |
|--|------------------|----------------|
| Answer Options   | Response Percent | Response Count |
| The Coastline.   | 87.7%            | 265            |
| Uninterrupted Offshore Public Views                                      | 56.0%            | 169            |
| Natural Habitats.  | 76.8%            | 232            |
| Hedgerows.   | 76.8%            | 232            |
| Trees.   | 69.2%            | 209            |
| The Farmed Landscape.  | 57.6%            | 174            |
| Field Patterns.  | 45.0%            | 136            |
| Ridges and Skylines.   | 47.4%            | 143            |
| Unspoilt Public Landscape Views.   | 69.2%            | 209            |
| Footpaths and Bridle paths.  | 87.1%            | 263            |
| Local Built Heritage   | 50.3%            | 152            |
| Other (Please say on page 11).   | 1.3%             | 4              |
| <b>answered question</b>   |                  | <b>302</b>     |
| <b>skipped question</b>  |                  | <b>5</b>       |

302 people responded to this question.

The most frequently selected aspect is 'The Coastline' selected 265 times or 87.7% of the response rate. This is followed by 'Footpaths and bridleways' selected 263 times or 87.1% of the response rate.

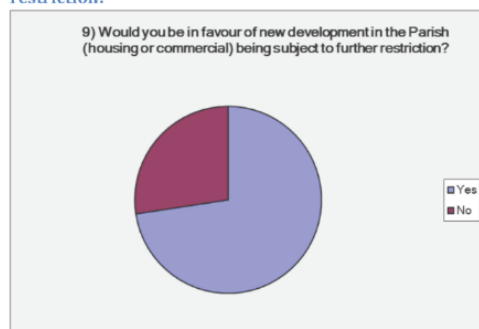
##### Q14. Do you think that there should be a design guide for buildings and extensions?



| 14) Do you think that there should be a design guide for new buildings and extensions? |     |    |                |
|--|-----|----|----------------|
| Answer Options   | Yes | No | Response Count |
| Residential development  | 252 | 39 | 291            |
| Commercial development   | 239 | 30 | 269            |
| <b>answered question</b>   |     |    | <b>294</b>     |
| <b>skipped question</b>  |     |    | <b>13</b>      |

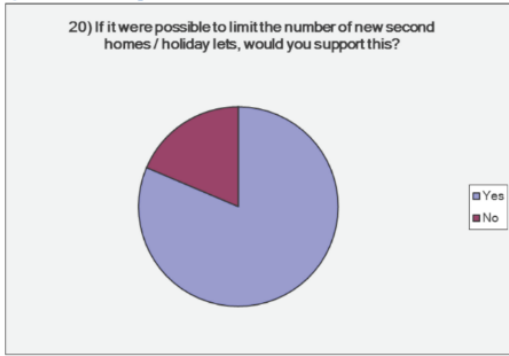
## THE HISTORIC ENVIRONMENT

##### Q9. Would you be in favour of new developments in the Parish (housing or commercial) being subject to further restriction?



| 9) Would you be in favour of new development in the Parish (housing or commercial) being subject to further restriction? |                  |                |
|--|------------------|----------------|
| Answer Options   | Response Percent | Response Count |
| Yes  | 72.6%            | 209            |
| No   | 27.4%            | 79             |
| <b>answered question</b>   |                  | <b>288</b>     |
| <b>skipped question</b>  |                  | <b>19</b>      |

**Q20. If it were possible to limit the number of new second homes / holiday lets, would you support this?**



**20) If it were possible to limit the number of new second homes / holiday lets, would you support this?**

| Answer Options | Response Percent | Response Count           |
|----------------|------------------|--------------------------|
| Yes            | 81.4%            | 245                      |
| No             | 18.6%            | 56                       |
|                |                  | <b>answered question</b> |
|                |                  | <b>skipped question</b>  |
|                |                  | 301                      |
|                |                  | 6                        |

**Analysis of Parish socio-economic data**

**SOCIO-ECONOMIC DATA FOR PERRANTHOOE PARISH**

Corwall Council's Local Insight report compares data for the Parish with averages in the South West and England. The following pages present some outline data from that report. The full 132 page report can be found at <https://corwall.com/communities/neighborhood>. Local Insight is a tool developed by Oxford Consultants for Social Inclusion (OCSI). Using data from a range of Government agencies and a selection of key indicators relevant to local authorities.

**FIG 01: GENERAL SUMMARY**

| PERRANTHOOE SOCIO-ECONOMIC DATA SUMMARY FROM LOCAL INSIGHT PROFILE   |  |
|--|--|
| <b>POPULATION</b><br>There are 3,075 people living in Perranuthooe   | <b>EDUCATION &amp; SKILLS</b><br>24% of people have no qualifications in Perranuthooe compared with 22% across England               |
| <b>VULNERABLE GROUPS</b><br>16% of children are living in poverty in Perranuthooe compared with 19% across England | <b>ECONOMY</b><br>25% people aged 16-74 are in full-time employment in Perranuthooe compared with 31% across England                 |
| <b>HOUSING</b><br>% of households with central heating in Perranuthooe compared with 96% across England            | <b>ACCESS &amp; TRANSPORT</b><br>18% of households have no car in Perranuthooe compared with 26% across England                      |
| <b>CRIME &amp; SAFETY</b><br>The overall crime rate is lower than the average across England                       | <b>COMMUNITIES &amp; ENVIRONMENT</b><br>The % of people satisfied with their neighbourhood is higher than the average across England |

**FIG 02: AGE & GENDER**

| Region       | Aged 0-15 | Working age | Aged 65+ |
|--------------|-----------|-------------|----------|
| Perranuthooe | 17.1%     | 53.3%       | 29.6%    |
| South West   | 17.5%     | 61.1%       | 21.4%    |
| England      | 19.1%     | 63.3%       | 17.7%    |


**FIG 03: NEIGHBOURHOOD SATISFACTION & LOCAL PARTICIPATION**

|  |   |   |   |
|--|---|---|---|
| 80%<br>(England = 75%)<br>People from different backgrounds get on well together in the local area | 67%<br>(England = 51%)<br>People who feel that they belong to their neighbourhood             | 64%<br>(England = 51%)<br>People who are satisfied with local facilities (e.g. bus, shops, etc)             | 88%<br>(England = 83%)<br>Aged 65+ satisfied with their homes and neighbourhood |
| 20%<br>(England = 11%)<br>People who feel that they are in danger from crime in their area         | 27%<br>(England = 21%)<br>People who believe they can influence decisions in their local area | 32%<br>(England = 27%)<br>People who have given unpaid help at least once per month over the last 12 months | 38 per 1,000 population<br>(England = 34 per 1,000)<br>Active charities         |

Source: Local Insight (2020), Active Charities - National Council for Voluntary Organisations (NCVO) (2020). Note: all information is reported at Local Authority level.

**Consultation and Engagement Strategy**

PERRANUTHNOE PARISH NEIGHBOURHOOD PLAN  
**CONSULTATION & ENGAGEMENT STRATEGY**



PERRANUTHNOE PARISH  
NEIGHBOURHOOD PLAN

“Looking forward to the future  
...Looking after the past.”

# Dedicated Neighbourhood Plan website (refer 'ourperran.co.uk')



## Planning For Our Future...

This website is a voluntary initiative, by the Perranuthnoe Community in partnership with members of the Parish Council. It aims to provide clear information on the **Draft Neighbourhood Plan** and to support local people to be involved in **shaping the future of this Parish**.



The Perranuthnoe Neighbourhood Plan process was initiated in 2014. Since then a number of **community consultations** have taken place around the Parish. These consultations aim to understand from local people what the important planning issues are here and how to address them. Please take some time to **find out more about the Plan** and to **give us feedback** that will help shape the final draft.



## The Objectives of the Plan...

Based on the community consultations over the last 6 years, here is a summary the main **Objectives** contained in the draft Perranuthnoe Neighbourhood Plan. **Click the boxes below** to see a summary of the **Policies** that have been written to implement them.

### Objective 1 - Community Welfare

To ensure that sustainable development in the Parish supports robust local communities, with a pride in their Parish, able to enjoy its many assets, whilst acting as custodians for future generations. The relevant policies are...

| Facilities | Footpaths & Bridleways | Green Space | Second Homes | Spacial Planning |
|------------|------------------------|-------------|--------------|------------------|
|------------|------------------------|-------------|--------------|------------------|

**POLICY CW01:** In consultations for the Neighbourhood Plan, people emphasised that it is important that planning works positively to **maintain and improve community facilities**, and that **land-use and building development** across the Parish should consider long-term

## The Neighbourhood Plan

The **Neighbourhood Plan** gives us, the Parish community, the chance to play a real role in deciding how our local area should develop.

Development has a long-term impact on a place and the people that live there, and it is important to get it right. It is vital that decisions are based on a **real knowledge of this area** and what is **important to people here**, so that it brings **long-term benefits for local communities**...both current and future generations.

The policies in the Neighbourhood Plan have been designed based on what the Parish community have said they value most about this area, and what people feel are the **key development planning issues and priorities here**. This has been gleaned from consultations over the last seven years. The development concerns local people raised and the things they said they value most about this Parish consistently pointed to similar issues.



People said that it is important that development works to sustain **cohesive, healthy communities**; that we protect our valuable **natural and heritage resources**; **support local people with homes and facilities**; that the design of buildings respects the **local character of this Parish**; that planning supports **local businesses** and recognises the **importance of farms and agricultural land** in this Parish...and that we ensure that previous, **inappropriate development planning does not set a precedent for the future**.

The policies in the Neighbourhood Plan have also been based on extensive research on to the local data, studies and planning policies, plans and regulations that are relevant here.

We don't have total free reign in determining planning decisions. Neighbourhood Plan policies have to align with national and county planning frameworks and policies, including the specific policies for the **AONB** and **WHS**. This Plan gives us the chance to define how these broader policies should be interpreted and applied at the local level in our Parish. To define what sustainable development means here. It provides the planning tool to enable us to **plan positively for sustainable development** in our Parish over the next 10 years.

**Parish Council website** (<https://www.perranuthnoepc.info/perranuthnoe-neighbourhood-development-plan/>)

## Perranuthnoe Parish Council

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### Perranuthnoe Neighbourhood Development Plan



The development stage of the Neighbourhood Plan for the Parish is now complete which has involved a significant amount of work from Councillors, the community, Cornwall Council and wider stakeholders.

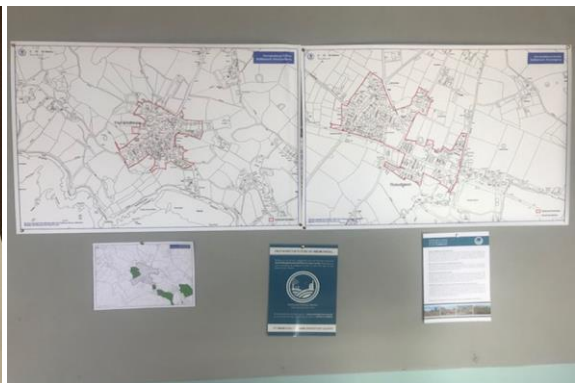
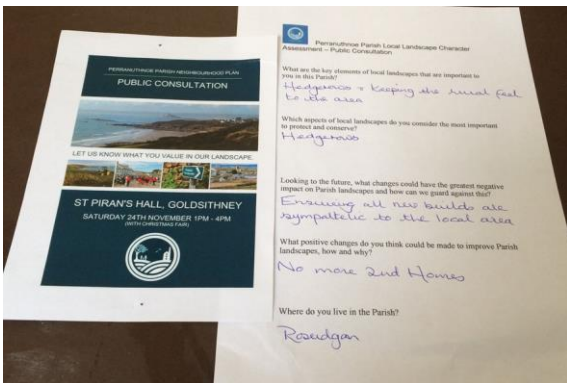
We would like to thank all who provided feedback on the Neighbourhood Plan during the regulation 14 consultation between July and November last year. We received extensive feedback from across the Parish, and from official organisations and 'statutory consultees'. The feedback received has strongly endorsed the Plan, and the comments and recommendations have been extremely helpful in enabling finalisation of the draft plan to support formal submission to Cornwall Council. It will now proceed to Regulation 16 assessment and subsequent examination.

[To view or download the Neighbourhood Plan click here.](#)

[To view or download the summary click here.](#)



# Examples of Posters, Flyers and images of Consultation Events







## HELP SHAPE THE FUTURE OF **YOUR** PARISH...

Building on the all of your inputs over the last four years the **Draft Neighbourhood Plan is now ready!** Please give us your comments & feedback to help us tailor the plan to the needs of your Parish.



PERRANUTHNOE PARISH  
NEIGHBOURHOOD PLAN

To download the draft plan go to - [www.ourperran.co.uk](http://www.ourperran.co.uk)  
or to see a hard copy call the Parish Clerk on **07918 194054**

IT'S **YOUR** PLAN... IT'S **YOUR** OPINION THAT COUNTS!

# What is important to you?



PERRANUTHNOE PARISH  
NEIGHBOURHOOD PLAN

## Perranuthnoe Parish Neighbourhood Plan...

**Thank you** to everyone who has given their input to this Plan. We have listened to your concerns, priorities & visions for the future.

The draft **Parish Neighbourhood Plan** is now ready for you to review. It establishes a series of policies, which aim to ensure that planning decisions are based on an understanding of this area & of what is important to people here.

**Please take some time to look at it and give us your feedback!**

Do the Plan's policies cover the issues which you feel are important in this Parish?

- If so which are the issues and policies that you feel are most important?
- If not, what do you feel is missing or incorrect?

**...Let's forge a stronger Parish together!**



[WWW.OURPERRAN.CO.UK](http://WWW.OURPERRAN.CO.UK)



# PERRANUTHNOE PARISH NEIGHBOURHOOD PLAN

VALUING OUR LANDSCAPE AND OUR COMMUNITIES



Please ensure  
that all the  
readers are  
switched off  
before leaving  
the room!



**Feedback Form developed for Regulation 14 pre-submission consultation**



We would really value your feedback and input. Whether you fully support the draft Plan or have concerns about any aspects of it then please let us know.

To make a comment please complete and return:

**PART A: PERSONAL DETAILS**

|                    |            |           |
|--------------------|------------|-----------|
| TITLE              | FIRST NAME | LAST NAME |
| ADDRESS & POSTCODE |            |           |
| TELEPHONE NUMBER   |            | EMAIL     |

**Please tell us a bit more about yourself: I am:**

| RESIDENT IN THE PARISH | NON-RESIDENT, OWN PROPERTY IN THE PARISH | A LAND OWNER | RESIDENT IN AN ADJACENT PARISH | EMPLOYED IN THE PARISH | AN EMPLOYER IN THE PARISH |
|------------------------|--|--------------|--------------------------------|------------------------|---------------------------|
|                        |  |              |                                |                        |                           |

**PART B: COMMENTS**

We would really value your comments and feedback on this draft Plan. Overall, do the Plan’s policies cover the planning issues which you feel are important in this Parish?  
 - If so, which are the issues and policies that you feel are most important?  
 - If not, what do you feel is missing or incorrect and why?

If your comments relate to a specific map or policy, we would be grateful if you could quote the map, policy or paragraph number, so that it is clear to us.

A Neighbourhood Plan is an evidenced based document, & under each policy the Plan presents the evidence base for it. If you suggest any significant changes to the Plan, it is important you outline what you feel should change, why the change is necessary, and the planning grounds for it, as we will be required to justify all amendments.

Thank you for your time, it’s your plan and it’s important that it sets the framework for the future you want for this parish!

**COMMENTS:**

Completed forms may be sent by email to: [perranNDP@gmail.com](mailto:perranNDP@gmail.com)  
or by post to the **Parish Council Clerk, Nanscott, Nancledra, Penzance TR20 8NA.**

If you have any queries or concerns please contact the Parish Council Clerk on  
07918194054 or via email to [clerk@perranuthnoeinfo.pc](mailto:clerk@perranuthnoeinfo.pc)

**Data Protection**

Perranuthnoe Parish Council has a duty to protect personal information and will process personal data in accordance with the Data Protection Act 1998 and any amendments to the Act. The personal data you provide on this form will only be used for the purpose of the Perranuthnoe Parish Neighbourhood Development Plan consultation process. It may also be used for the prevention or detection of fraud or crime and in an anonymous form for statistical purposes. The data will be stored on computer and/or manual files. You have a right to a copy of your information held by any organisation, with some exemptions. Your details will be stored in line with current GDPR requirements, subject to any consents for Regulation 16 consultation.

Please also confirm that you consent to your details being shared with Cornwall Council for the purposes of the Council carrying out their duties at Regulation 16 consultation:

**YES/NO** (Delete as applicable.)



# PERRANUTHNOE NEIGHBOURHOOD PLAN SUMMARY



## What is Neighbourhood Planning?

Neighbourhood planning gives communities the opportunity to have a say in how their Parish is developed. It gives local people the chance to identify what the important planning issues are, and how they should be addressed. It provides a means to ensure that planning is fine-tuned to meet the needs of the Parish and the communities that live here, to support sustainable development that will benefit both current and future generations.

## What is the Perranuthnoe Neighbourhood Plan?

Once approved, it will guide how planning decisions are made in this Parish. Decisions will no longer be made solely based on county and national plans; they will be made based on the local Parish plan, whose objectives and policies address priorities set by Parish communities.

## **VISION: Perranuthnoe Parish-a special place to live, work and visit**

*The Neighbourhood Development Plan says what makes Perranuthnoe Parish such a special place in which to live and work, what we value and what we want to conserve and enhance. It strives to ensure that Parish communities get the types of development we need, such as new homes and businesses, that this is resilient and sustainable, and that we protect the outstanding natural scenic beauty of landscapes and the heritage character of our Parish, recognising their importance on a local, national and international scale.*

**Read on for a summary of the policies in the draft Neighbourhood Plan...**



## **OBJECTIVE 1: COMMUNITY WELFARE (CW)**

### **Policy CW1: Community Assets and Facilities**

Summary: This policy aims to ensure that public buildings and recreational facilities of importance to local communities are protected and enhanced, and that long-term welfare needs are taken into consideration within planning assessments.

### **Policy CW2: Safeguard Public Rights of Way (PROW)**

Summary: This policy aims to ensure that development or change in land-use does not impact on footpaths, bridleways, tracks, lanes and cycle-ways, or on public access to them.

### **Policy CW3: Local Green Space**

Summary: This policy identifies parcels of land across the Parish that are of special significance to local communities. These are designated for protection as 'Local Green Space' (LGS). The reasons for their designation vary and include as: allotments, sports grounds, playgrounds, graveyards, and as areas that are particularly important to the Parish due to their recreational value, natural scenic beauty, tranquillity, local 'sense of place', cultural significance, or open space characteristics.

### **Policy CW4: Principle Residency**

Summary: This policy specifies that all new housing built in Perranuthnoe village and in surrounding areas within the AONB, must be dedicated for use as housing for local residents 'in perpetuity'. This policy applies solely to new-builds not to existing housing.

### **Policy CW5: Spatial Planning and Cumulative Impact**

Summary: This policy aims to ensure that in assessing planning applications, decision-makers consider the cumulative impact of development on surrounding areas, and the implications for local communities. It is focussed on three priority issues for this Parish: 1) parking pressures, congestion and safe access; 2) flooding, erosion and subsidence risk; 3) development impact on community assets.

## **OBJECTIVE 2: HOUSING AND TEMPORARY ACCOMMODATION (HTA)**

### **Policy HTA 1: Development Boundaries**

Summary: This policy provides clear guidance on where new housing development should be focussed within the Parish, by establishing 'development boundaries'. This policy will help to ensure that the Parish is able to meet local housing needs whilst safeguarding the distinct identity of villages, hamlets and their communities. It aims to protect against further ribbon development and 'development sprawl' out from existing settlements and hamlets.

### **Policy HTA 2: Replacement Buildings and Conversions**

Summary: This policy provides the planning guidance needed to ensure that replacement buildings and conversions respect local heritage and landscape character, in line with the AONB and WHS designations and policies.

### **Policy HTA 3: Affordable Housing**

Summary: This policy aims to ensure that the provision of affordable housing is clearly focussed on meeting the needs of the local Parish community, and that affordable homes are reserved for those most in need, in perpetuity.

### **Policy HTA 4: Caravans and other forms of Moveable Accommodation**

Summary: This policy provides clear planning guidance to ensure that the placement and use of caravans in fields, or on land outside the curtilage of a home, adheres with that permitted in national regulations, and does not unacceptably intrude on local communities or on AONB or WHS landscapes.

## **OBJECTIVE 3: BUILDING DESIGN AND LANDSCAPING (BDL)**

### **Policy BDL1: Building Design, Scale, Layout and Landscaping**

Summary: This policy provides clear guidance to ensure that development is well integrated with its surroundings, respecting the distinctive local character of the AONB and WHS areas of this Parish. It provides the local policy guidance needed to achieve the Cornwall Local Plan (CLP) Policy 12 requirement



that: 'development must ensure Cornwall's enduring distinctiveness and maintain and enhance its distinctive natural and historic character'.

### **Policy BDL2: Design and Location of Signs and Advertisements**

Summary: This policy aims to ensure that signs and advertisements are not visually intrusive.

## **OBJECTIVE 4: NATURAL LANDSCAPES AND BIODIVERSITY (NLB)**

### **POLICY NLB 1: Biodiversity, Ecosystem Resilience and the Outstanding Natural Beauty of Landscapes**

Summary: This policy provides the local guidance necessary to support well-informed planning that works to protect ecosystems and biodiversity across the Parish, and to conserve the outstanding natural beauty of landscape character within the AONB.

### **Policy NLB 2: Coastal Change Management Area (CCMA)**

Summary: This policy aims to ensure that development planning in the coastal zone of this Parish is based on an understanding of long-term coastal erosion processes, and that it works effectively to minimise social, economic and environmental risks. It establishes a series of development planning zones, based on the national predicted 100-year coastal erosion line/rate, and aims to ensure that planning is managed based on assessment of erosion risks.

### **Policy NLB 3: Light Pollution and Glare**

Summary: This policy supports the implementation of national planning guidelines on light pollution; it aims to reduce the impact of light pollution and glare in this Parish. The policy recognises the value that local communities place on conserving dark skies, and the increasing challenges that the Parish faces in controlling light pollution and glare from development.

### **Policy NLB 4: Green Infrastructure, Hedgerows and Cornish Hedges**

Summary: This policy places a priority on the protection and enhancement of Cornish Hedges and hedgerows; it requires Cornish Hedges and hedgerows to be conserved within all development proposals, unless there are clear and valid reasons to remove them. It follows Cornwall Council's planning principles that 'due to the high biodiversity value of hedges, and the key role they play in our landscape and sense of place in Cornwall, there is a strong presumption in favour of the retaining of all hedges within developments.'

### **Policy NLB 5: Environmental Responsibility in Development**

Summary: This policy aims to encourage environmental responsibility in development.

## **OBJECTIVE 5: HERITAGE CHARACTER AND ASSETS (HCA)**

### **Policy HCA 1: Heritage Value of the Mining Landscape World Heritage Site (WHS)**

Summary: This policy places a strong priority on protecting the heritage attributes of areas of the Parish that lie within the WHS, and of all areas surrounding it which affect appreciation of its heritage character. The policy identifies the key heritage characteristics of the WHS in this Parish, and provides guidance as to how development should respect and protect that heritage.

### **Policy HCA 2: Heritage Attributes of the Area of Outstanding Natural Beauty (AONB)**

Summary: This policy underlines the importance of heritage character to the local distinctiveness of AONB landscapes in this Parish. It provides the local policy guidance necessary to conserve the cultural and historic heritage of the AONB in this Parish, and identifies a number of priority 'designated' and 'non-designated' heritage assets for protection.

### **Policy HCA 3: Ancient Mining Sites protected as Unique Landscape Features and Areas of Biodiversity and Geo-diversity Significance**

Summary: This policy protects ancient mining sites and spoil heaps across the Parish, recognising their importance as unique geological sites and landscape features, many of which are now unique ecosystems

supporting rare species; and recognising their importance as heritage features, core to the cultural history of this Parish.

#### **Policy HCA 4: Archaeological Sites**

Summary: This policy aims to ensure that development planning recognises and considers the value of archaeological sites and assets as a finite and non-renewable resource. It provides local planning guidance to ensure that when development is proposed which may impact on an archaeological site, a review is undertaken to determine appropriate measures to conserve or record archaeological assets of local significance.

### **OBJECTIVE 6: ECONOMY AND BUSINESS (EB)**

#### **Policy EB1 Sustainable Local Businesses**

Summary: This policy aims to support small-scale local business development that works positively to enhance community livelihoods and to sustain heritage and environmental assets.

#### **Policy EB2: Agricultural Land, Buildings and Sustainable Production**

Summary: This policy recognises the importance of agriculture to this Parish. It aims to support sustainable agricultural production and to ensure that development does not negatively impact on the effective operation of farms, or agricultural land.

#### **Policy EB3: Campsites and Holiday Accommodation**

Summary: This policy aims to ensure that development associated with holiday accommodation and campsites in this Parish is based on a clear understanding of tourist accommodation needs, brings benefits for Parish communities and businesses, and does not have a negative impact on AONB and WHS landscapes.

#### **Policy EB4: Equestrian Development**

Summary: This policy provides guidance for development associated with equestrian use of land. It encourages positive social, landscape and biodiversity outcomes from equestrian development.

### **OBJECTIVE 7: DECISION MAKING TO ACHIEVE DEVELOPMENT THAT IS SUSTAINABLE**

#### **Policy DM1: Neighbourhood Plan Implementation**

Summary: This policy focuses on the Neighbourhood Plan implementation and monitoring process. It underlines the importance of ensuring that decisions are made based on accurate data and information, clear and transparent communication processes, and effective consideration of the Neighbourhood Plan policies.