

Perranzabuloe Policy Matrix – Cornwall Council officer comments Feb 2022

| | Policy | Policy title | Comments |
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| 1 | SD1 | Settlement Boundaries | Fine |
| 2 | SD2 | Sustainable Design of Development and the Quality and Distinctiveness of the Built Environment | <p>This is a catch-all policy; I think the best advice might be to break this policy up and to have one overall ambition for general / sustainable development and to incorporate specific requirements eg recycling / waste bins / parking into existing design policies elsewhere in the plan separate areas.</p> <p>Update references to the newly adopted Cornwall Design Guide: Cornwall Design Guide - Cornwall Council</p> <p>NB The Cornwall Design Guide will be updated from time to time as necessary so it is best to refer to the latest Cornwall Design Guide on this webpage rather than its date.</p> |
| 3 | SD3 | Reducing the Need to Travel by Car (Major Development | Fine |
| 4 | SD4 | Managing Flood Risk from Surface Water Run-off | Seeking additional input – comments to be provided asap. |
| 5 | HO1 | Principal Residence Policy | <p>For consistency, we'd advise that the policy text mirrors that which has been successfully used in recent NDPS (below). In addition, you will need robust evidence to support the need for a principal residence policy, demonstrating that the level of second homes is having a detrimental impact on community sustainability, for example, whether local facilities can operate year-round, or whether the local school is thriving.</p> <p>Your policy justification gives a figure of 14% of second homes across the parish. This may not be enough to justify a second homes policy at examination (in St Agnes, the policy was restricted to part of the parish only). You should try and strengthen your evidence base if you wish to retain this policy, using more up to date information and trying to demonstrate the impact on your local communities. You may also want to consider restricting the policy to the parts of the parish that are most impacted by second or holiday homes.</p> <p>Suggested policy text Open market housing, excluding replacement dwellings, will only be supported where there is a restriction to ensure its occupancy as a Principal Residence.</p> |

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| | | | <p>Sufficient guarantee must be provided of such occupancy restriction through the imposition of a planning condition or legal agreement. New unrestricted second homes will not be supported at any time.</p> <p>Principal Residences are defined as those occupied as the residents' sole or main residence, where the residents spend the majority of their time when not working away from home.</p> <p>The condition or obligation on new open market homes will require that they are occupied only as the primary (principal) residence of those persons entitled to occupy them.</p> <p>Occupiers of homes with a Principal Residence condition will be required to keep proof that they are meeting the obligation or condition and be obliged to provide this proof if/when Cornwall Council requests this information. Proof of Principal Residence is via verifiable evidence which could include, for example (but not limited to) residents being registered on the local electoral register and being registered for and attending local services (such as healthcare, schools etc.).</p> |
| 6 | HO2 | Design of Dwellings | <p>NB the new Cornwall Design Guide: Cornwall Design Guide - Cornwall Council was adopted in December 2021 which is worth taking a look at. It will be updated from time to time as necessary so if referred to it is best to refer simply to the Cornwall Design Guide on this webpage rather than its date.</p> <p>The preference for on-plot parking over on-street parking in the policy and in Design Principles for Character Areas CA3d/CA3e/CA4 in the Design Code does not align with the emerging Policy in the Climate Emergency DPD Policy T2 and Cornwall Design Guide p46-47. Consider a more flexible allowing for well-integrated on-street parking in those locations where it would be feasible. The Cornwall Council approach seeks to reduce land take (e.g. for the benefit of garden space) and visual impact as well as not encouraging car use.</p> <p>Appendix 3 / Design Code:</p> <ul style="list-style-type: none"> - Page 15 – the new Cornwall Design Guide is published so references should be updated (3.1) - where possible it may be useful for the character area descriptions to be clearer on which features (especially of more modern development) are considered positive contributions and which detract. - page 51 – potential to recognise drainage benefits of green infrastructure (drainage being mentioned at p44, 4.2). - page 55 CA3b would be helpful to explain what a “focal gateway” means. - page 65 “other orientation reasons” – it may be helpful to include effective use of solar PV as an example, as included as a preference in the Climate Emergency DPD Policy SEC1. - page 65 points h and k – it may be helpful to mention that Cornish hedges can contribute to biodiversity network as well as character: Cornish hedge biodiversity - Cornwall Council. |

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| | | | <ul style="list-style-type: none"> - page 68 – NB advice on lighting for NDPs is available at Dark Night Sky Guidance. - Design code 05: As well as bringing attention to white render staining tendencies, specification could also look at sympathetically identifying local render typologies (eg. soft edge, rough finish) |
| 7 | HO3 | Parking Design in Housing Developments | ii) preferably provides a minimum of two on-plot parking spaces per unit side by side where feasible, not in line, to discourage on-street parking; |
| 8 | HO4 | Community Homes | Fine |
| 9 | HO5 | Housing for Specific Needs | This policy seems to include local residence criteria for accessible homes. If these are not affordable homes, you cannot restrict who they can be sold to. |
| 10 | NE1 | Areas of Ecological, Landscape, Biodiversity and Geodiversity Value | Fine |
| 11 | NE2 | Landscape Character and Landscapes of Local Significance (LLS) | Fine |
| 12 | NE3 | Embedding Green and Blue Infrastructure into New Development | This is probably better covered in your design guide / policies. |
| 13 | NE4 | Protecting Trees, Woodland and Hedgerows | It will not always be possible to keep all trees and hedgerows, in some cases, it will be appropriate to provide alternative green infrastructure elsewhere on site and in some cases offsite. I couldn't find the Appendix to look at the extent of protected trees / hedgerows. |
| 14 | NE5 | Biodiversity Net Gain in New Development | Not sure that this adds anything to the policies in the CEDPD / Biodiversity SPD? You should ensure that your NDP is adding local priorities that complement Local Plan policies. |
| 15 | NE6 | Settlement Gaps and Green Buffers | Although these areas are marked on a map, I think there needs to be some additional text justification for the policies. |
| 16 | NE7 | Important Views and Vistas | No conflict with LP or emerging CE DPD. |
| 17 | NE8 | Local Green Space | <p>All spaces designated as Local Green Space need to meet the following criteria:</p> <ul style="list-style-type: none"> • where the green space is in reasonably close proximity to the community it serves; • where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and • where the green area concerned is local in character and is not an extensive tract of land. |

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| | | | <p>I note that you have 2 appendices mapping and justifying the designation of these spaces. Examiners are quite strict on accepting these and will often visit proposed LGS to assess their local significance; sites will often be rejected if they are not demonstrably special.</p> <p>For consistency, I'd suggest amending the policy in line with recent LGS policy wording:</p> <p><i>Suggested Policy text:</i> <i>The areas as described and mapped at Appendix X are designated as a Local Green Space in accordance with paragraph 100 101-2 of the NPPF.</i> <i>Development that would harm the openness or special character of a Local Green Space or its significance and value to the local community will not be permitted unless the proposal can demonstrate very special circumstances that outweigh the harm to the Local Green Space.</i></p> |
| 18 | NE9 | Dark Skies | No conflict with LP or emerging CE DPD. Recommend specifying what the lighting measures should be – examples are provided in Dark Night Sky Guidance . You may wish to consider how best to balance minimising adverse impact on the dark sky with “generously proportioned fenestration” advocated in Design Code CA3f. NB the Cornwall Design Guide recommends “large expanses of glazing are positioned in a way to help conserve intrinsically dark landscapes and create or retain dark corridors for nature” and further advice on fenestration is provided in the Dark Night Sky Guidance . |
| 19 | NE10 | Coastal Vulnerability Zone | Seeking further input on these policies and will send separately. |
| 20 | NE11 | Development and the Coastal Management Plan | Not sure that this policy is needed – suggest removal. |
| 21 | EW1 | Renewable Energy and Community Energy Projects | Comments to follow |
| 22 | EW2 | Non-mains Sewer Wastewater | Comments to follow |
| 23 | TT1 | Transport Plan | fine |
| 24 | TT2 | Transport Assessments & Travel Plans | fine |
| 25 | TT3 | Dedicated Parking for New Non-residential Development | No conflict with LP or emerging CE DPD. Might be helpful to include reference to EV charging infrastructure. |
| 26 | TT4 | Safeguarding the Disused Railway | fine |
| 27 | TT5 | Protecting Existing Car Parking Capacity in Perranporth | No conflict with LP or emerging CE DPD. |

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| 28 | TT6 | Preventing Loss of Car Park Capacity | No conflict with LP or emerging CE DPD. |
| 29 | TT7 | Beach Road Car Park | No conflict with LP or emerging CE DPD. |
| 30 | TT8 | Noise from Development at Trevellas Airfield | fine |
| 31 | LW1 | New Community and Cultural Facilities | fine |
| 32 | LW2 | New Sports Facilities | fine |
| 33 | LW3 | Providing Community Infrastructure to Match Demand | It might be better to link provision of infrastructure to community priorities – so have a policy that states that CIL or other development funds, should be used to deliver community priorities – these priorities can then be regularly reviewed by the parish council. [Note that education contributions are already taken where appropriate from new development, health care facilities are often privately owned and so would not necessarily be eligible.] |
| 34 | HE1 | Heritage Assets and the Historic Environment | I think your heritage policies need some consolidation. Where a policy requirement is addressed in CLP policy 24, it should not be duplicated here. In general though we are happy with the content. |
| 35 | HE2 | Signs and Advertising | |
| 36 | HE3 | Conservation Areas and Non-designated Historic Settlements | |
| 37 | HE4 | Historic Landscape Character | |
| 38 | HE5 | Cornwall and West Devon WHS Area A7 St Agnes Mining District | |
| 39 | HE6 | St Piran's Church and St Piran's Oratory | |
| 40 | HE7 | Penhale Camp and Assets within its Boundaries and Setting | Update in line with HE comments |
| 41 | HE8 | Perranzabuloe's Prehistoric Assets and Landscape | |
| 42 | HE9 | Newly Identified Heritage Assets and Archaeological Remains | |

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| 43 | HE10 | Accessibility to Heritage Assets | |
| 44 | BER1 | Preventing Loss of Existing Employment Areas | Does the policy apply only to the 'Employment Areas' on maps 19-21. What about on an existing business site that is not in one of the identified locations? May need clarification but otherwise fine. |
| 45 | BER2 | Quality Employment Premises | Add a further condition to the list in iii) h) heritage assets |
| 46 | BER3 | Expansion of Employment Sites | Add a further condition to the list in iii) h) heritage assets |
| 47 | BER4 | New Technology and Hi-tech Industries | Does this policy apply anywhere within the parish? Suggest clarification about impact on landscape etc. |
| 48 | BER5 | Digital Communication Infrastructure Improvements | fine |
| 49 | BER6 | Live / Work | fine |
| 50 | BER7 | Small Scale Business Initiatives | Fine – but why is the policy limited to start up firms? |
| 51 | BER8 | A30 Corridor Business Opportunity Area | <p>See comments from NE - In terms of whether a full SEA is required, the trigger for such a requirement from a heritage perspective tends to be where a Plan proposes to allocate sites for development, usually housing. We note that there are no housing site allocations proposed but our attention is drawn to Policy BER8. Although this states that the policy is not a site allocation it nonetheless identifies a number of <i>“preferred indicative locations for the expansion of employment premises where provision cannot be made within the settlement boundaries. These areas are not allocated sites but indicate an “in principle” preference.”</i></p> <p>Our interpretation of this provision is that it is intended to send a message to potential developers of where the community prefers such development to take place. But we can find no evidence on the Plan's website beyond reports of broad liaison with commercial agents to substantiate the means by which these locations have been identified, or the criteria which might have been used to gauge their suitability in planning terms.</p> <p>Notwithstanding the assertion to the contrary, we would consider that this policy as drafted represents a de facto allocation of the sites in question, and potentially a hostage to fortune provision given the apparent absence of evidence to demonstrate that there is at least a reasonable degree of delivery and an absence of harm to what may be relevant heritage assets.</p> |

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| | | | <p>There is no reason why such aspirations should not feature somewhere in the Plan, but in the absence of evidence perhaps in the supporting text or as an appendix. We note that other policies highlighting even only thematic opportunities for development include criteria or qualifications requiring development to conform with other policies in the Plan and elsewhere. While the sites proposed in BER8 might or might not have the potential to generate significant environmental effects for the historic environment, there is no evidence to inform this consideration one way or the other.</p> <p>We would therefore recommend that either the aspiration is removed as a formal policy, or provision is made within the wording of the policy that any exploration of the potential for development of the sites must demonstrate that it can be accommodated without causing harm to heritage assets.</p> <p>On this basis we would be happy to concur with the view that a full SEA is not required. As the Plan stands we must advise that we are unable to agree that a full SEA is not required.</p> |
| 52 | BER9 | Perranporth Village Centre Uses | <p>Note that many changes will be covered by permitted development rights. In addition, change of use within the same use class is permitted- so you cant control changes from any 'E' use to another 'E' use. Recommend that the requirement to show 9/ 12 month usage is moved to the supporting text. Remove para 4.</p> <p>May be better if you change / simplify the policy - keep the map defining the primary and secondary areas. State that 'E' uses are preferred in the primary area, with 'E' and other uses in the secondary area.</p> |
| 53 | BER10 | Shop Front Design in Perranporth | <p>I think it would be useful to combine the next 6 policies (BER 10 – 15) into a single one – 'Commercial development in Perranporth, Goonhavern and Bolingey' (provisions specific to Perranporth only should be under a different bullet point). This will make it easier for planning officers to use.</p> <p>We're putting together a design guide for retail to residential frontage alterations in light of the Use re-classifications. It might be useful to include a reference to this guide in preparation for its release</p> |
| 54 | BER11 | Perranporth Village Centre Traffic, Circulation and Wayfinding | See above |

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| 55 | BER12 | Perranporth Village Centre Areas of Intervention | No conflict with LP or emerging CE DPD. |
| 56 | BER13 | Retail Expansion in Perranporth, Goonhavern and Bolingey | See above |
| 57 | BER14 | Provision for (Consumer) Waste Facilities at Hot Food Takeaways in Perranporth, Goonhavern and Bolingey | See above |
| 58 | BER15 | Supporting Community Shops, Food and Drink Premises and Services | See above |
| 59 | TO1 | Existing and New Static Caravan, Camping, Glamping and Towing Caravan Sites | Policy TO1 (para 1) goes further than local plan policy 5 in that it prevents any change of use or diversification of existing caravan sites. Suggest that you change it to better reflect policy 5 of the local plan – loss of business space where it can be demonstrated that the business is unviable / unmarketable. Para 2 and 3 are fine. |
| 60 | TO2 | New Built Tourist and Visitor Accommodation (Bed and Breakfast, Hotels, Guest Houses and Purpose-built Holiday Lets and Lodges) | fine |
| 61 | TO3 | Broadening the Visitor and Tourism Offer through Sustainable and Wet Weather Attractions | fine |