

## Draft Perranzabuloe Parish Neighbourhood Development Plan (NDP)

### Community Consultation Comments Form

Please use this form to provide comments on the draft Plan and its associated documents including the Perranzabuloe Parish Design Code and the Perranporth Strategic Masterplan. Please state to which page number, section or policy your comment refers, unless it is a general comment about the Plan as a whole.

You can post or drop-off your comments to: Neighbourhood Development Plan Consultation, Perranzabuloe Parish Council, Chyanhale, Ponsmere Valley, Perranporth, Cornwall, TR6 0DB. You can also email your response to the Neighbourhood Development Plan Steering Group at [comments@perranplan.co.uk](mailto:comments@perranplan.co.uk).

The deadline for comments to be received is Friday 17th June 2022. Thank you.

Name: [REDACTED]

Title / organisation /  
Business (if not an individual): N/A

Address\*: [REDACTED] TR6 0DH

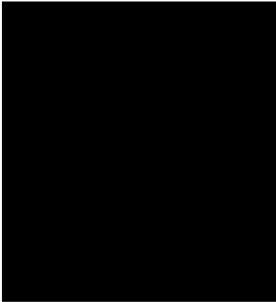
Email address: [REDACTED]

Resp. no.  
(office use only)

*\*You do not have to give your contact details, although it is helpful for us to understand where in the Parish you live in relation to some comments made and you may wish to provide your details to be contacted in the future about progress with the Plan. Individuals' comments will be anonymised in the report of comments received which will be made public following consultation. Organisations, agencies, private businesses and consultants etc. will normally be named, but if you are representing one of these, please indicate if you would prefer that your response is anonymised.*

Page no. / section / policy reference	Comments
<p>Page 6 of Summary Leaflet</p> <p>Section: Sustainable Development</p> <p>Policy Reference Policy SD1: Settlement Boundaries</p>	<p>Please see full detailed comments enclosed in the letter attached to this document.</p>

*Please continue comments over the page if necessary.*



**By post to:**

Neighbourhood Development Plan Consultation  
Perranzabuloe Parish Council  
Chyanhale  
Ponsmere Valley  
Perranporth  
Cornwall  
TR6 0DB

**By email to:** [comments@perranplan.co.uk](mailto:comments@perranplan.co.uk)

24 May 2022

Dear Sir or Madam

**Perranzabuloe Neighbourhood Development Plan (NDP) - Settlement Boundary**

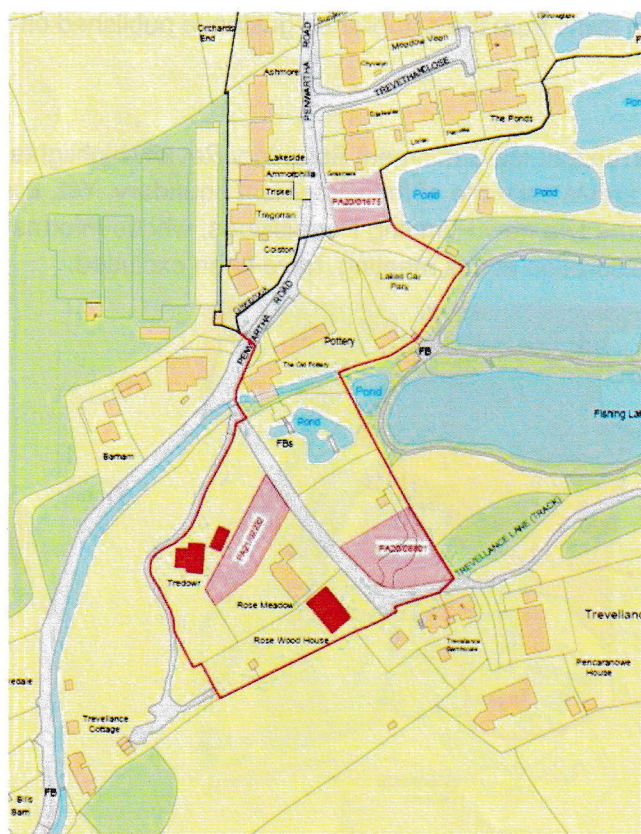
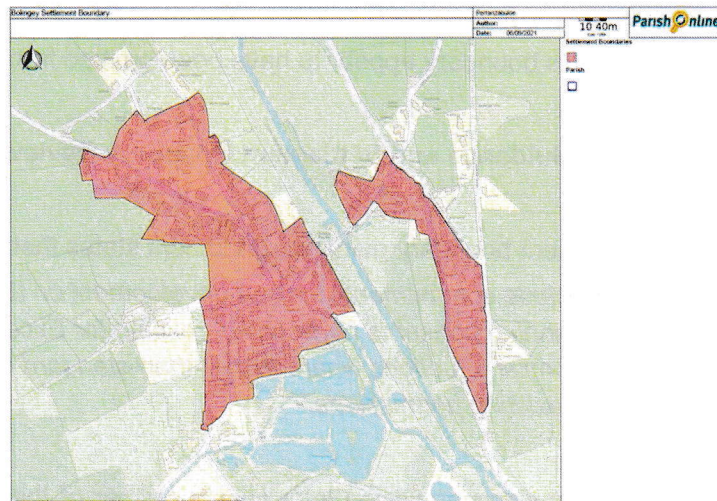
I am requesting a formal review of the Draft Definitive Settlement Boundary for South-West Bolingey.


I believe that this request is justified by the evidence presented in the commentary below.

I have prepared an alternative Draft Definitive Settlement Boundary for South-West Bolingey which could provide the basis for future discussions and decision making.

**Draft Definitive Settlement Boundary Maps – Bolingey Settlement Boundary**

The Bolingey Settlement Boundary map image dated 6 September 2021 does not show both new developments PA18/04649 and PA19/08085 ("the Developments") and neither of the planning permissions PA20/08801 and PA21/02232 ("the Planning Permissions") which have been approved along the lower South-West edge of the Draft Definitive Settlement Boundary Map.



12/03/15		
Purification Real Estate      Extension Letter c. 10.20.2000      Original		
12/03/15 MR IN DUTION		
Property Address: PERRANZ/BL0E NEIGHBOURHOOD		
Drawing Title: SETTLEMENT BOUNDARY ALTERNATIVE PROPOSAL 200-12/03/15 CH19186		
Drawing No.	1202-418	Size
Scale	1:5000	Paper Size
Author	CH	Checked By
 <b>Crossley Hill</b> Chartered Surveyors		
Crossley Hill Chartered Surveyors 24, Lorne Street, Tuggerah, NSW 2250 <a href="http://www.crossleyhill.com.au">www.crossleyhill.com.au</a> <a href="http://www.crossleyhill.com.au">www.crossleyhill.com.au</a>		

Developments (PA18/04649 and PA19/08085) and the Planning Permissions (PA20/08801 and PA21/02232) which lie outside this boundary appear to have been omitted from consideration.

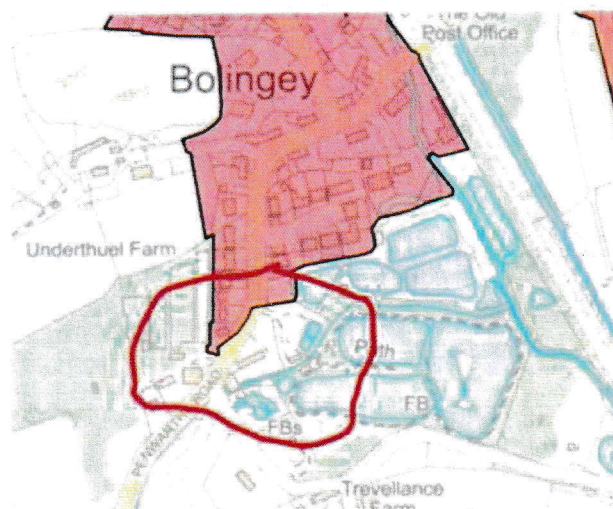
## **Defined Settlement Boundary Guidance and Settlement Boundary Review**

Criterion 4<sup>1</sup> of the defined settlement boundary guidance document states that:

*'Settlement boundaries should include commitments for built development on the edge of a settlement (e.g. outstanding but still valid planning consents for housing), except for Exception sites for housing that have not yet been built and similar situations where higher-than-standard proportions of AH have been successfully negotiated on existing permissions.'*

By reference to the available planning permission information, neither of the Planning Permissions meet the affordable housing or exception site component of this exception; these planning permissions should therefore have been considered when establishing the settlement boundary for this Neighbourhood Development Plan. Whilst Martin Lee and two senior Cornwall Council planning officers considered there to be 'no hard and fast rules re setting SB's' and that 'the key was to have a consistent logic',<sup>2</sup> this is a clear diversion away from the established guidance published on the Parish NDP website.

It is acknowledged that page 9 of the Perranzabuloe Settlement Boundary Review highlights the 'lower density' and 'less integral' part of the South-West edge of the settlement boundary. Yet, it is not clear why these two new Developments and the two new Planning Permissions, whose information would have been available at the point of consideration at this meeting, have been excluded.



**[Image C: Bolingey Settlement Boundary located (South-West edge) as located in the Perranzabuloe Settlement Boundary Review (Page 9) (2021-08-31)]**

<sup>1</sup> Microsoft Word - Appendix XX Criteria for defining SBs, Rev 3 June2021.docx (perranplan.co.uk)

<sup>2</sup> Microsoft Word - SB Review - 2021-08-31 - notes with CC + Martin Lee comments.docx (perranplan.co.uk) (Page 2)

By reference to image C, the exclusion of the new Developments and Planning Permissions from the Settlement maps being reviewed by planning experts, perhaps places into question the objectivity of the analysis of the SW Bolingey Settlement Boundary. Where the plans on page 9 do not identify these planning developments,<sup>3</sup> this puts into question whether these were seen and assessed by the panel of experts who reviewed Bolingey's settlement plan.

To stop at a point where known developments are due to take place is not logical. Whilst criteria 9 of the settlement boundary guidance states '*isolated or sporadic development which is clearly detached from the main built-up area of the settlement should be excluded,*' considerations of these new Developments and permissions would have further highlighted the lessening of any sporadic nature. By reference to the attached updated plan reflecting the positioning of the new Developments and the Planning Permissions, there is sufficient evidence that this area of land should not be considered 'isolated or sporadic' and justifies the extension of the proposed Settlement Boundary to include them.

These planned developments and permissions indicate the transition from an area of previously 'low density' to one which will imminently change. In connection with Criterion 1 of the settlement boundary guidance, these developments '*are likely to have a degree of permanence.*' Certainly, once built, these new Developments shall have the degree of permanence to satisfy this criterion. Although not all of these planned developments have been constructed yet, the Planning Permissions are indicative of upcoming change.

As per the Parish website, the Settlement Boundary Review by external experts was last updated on 6 August 2021. PA20/08801 was validated 21 October 2020 and the decision issued on 11 December 2020. PA21/02232 was validated on 17 March 2021 and the decision issued on 19 July 2021. As for the Developments, PA18/04649 was completed in 2019 and the structural work for PA19/08085 was completed early 2021. Such information demonstrates that there was ample time for these planning applications and the Developments to have been considered in the review of settlement boundaries for this NDP and for the map information to have been updated in accordance with such information. The observed omissions of the above planning information thus raises concerns that the review by the planning experts may have been prejudiced by the lack of up-to-date Settlement Maps available for analysis.

Ultimately, it is a matter of importance that the Settlement Boundary includes the new Developments and the approved Planning Permissions in order to apply the proposed policies (particularly 'Policy SD1: Settlement Boundaries') in the Neighbourhood Development Plan for Perranzabuloe effectively.

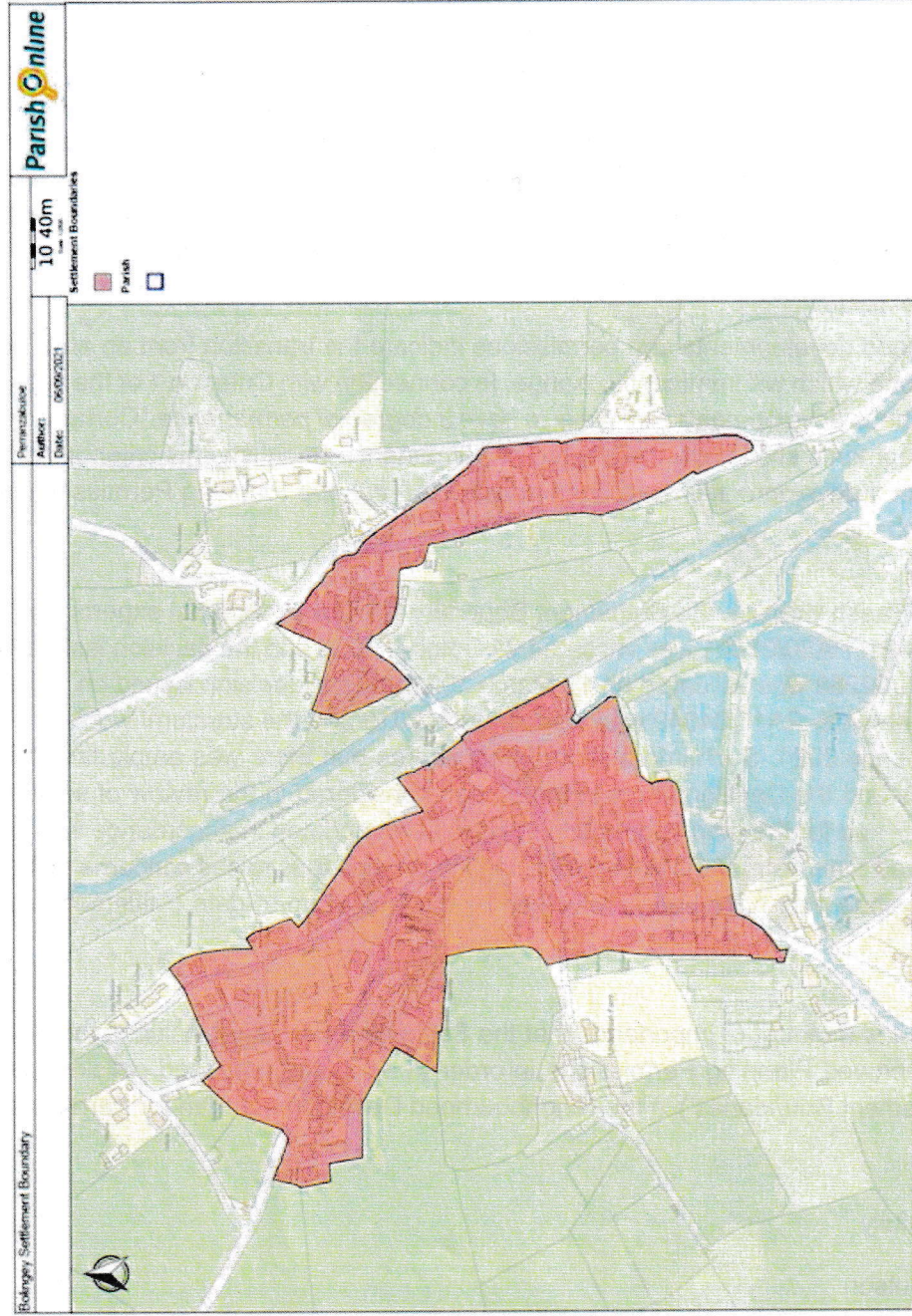
Yours faithfully



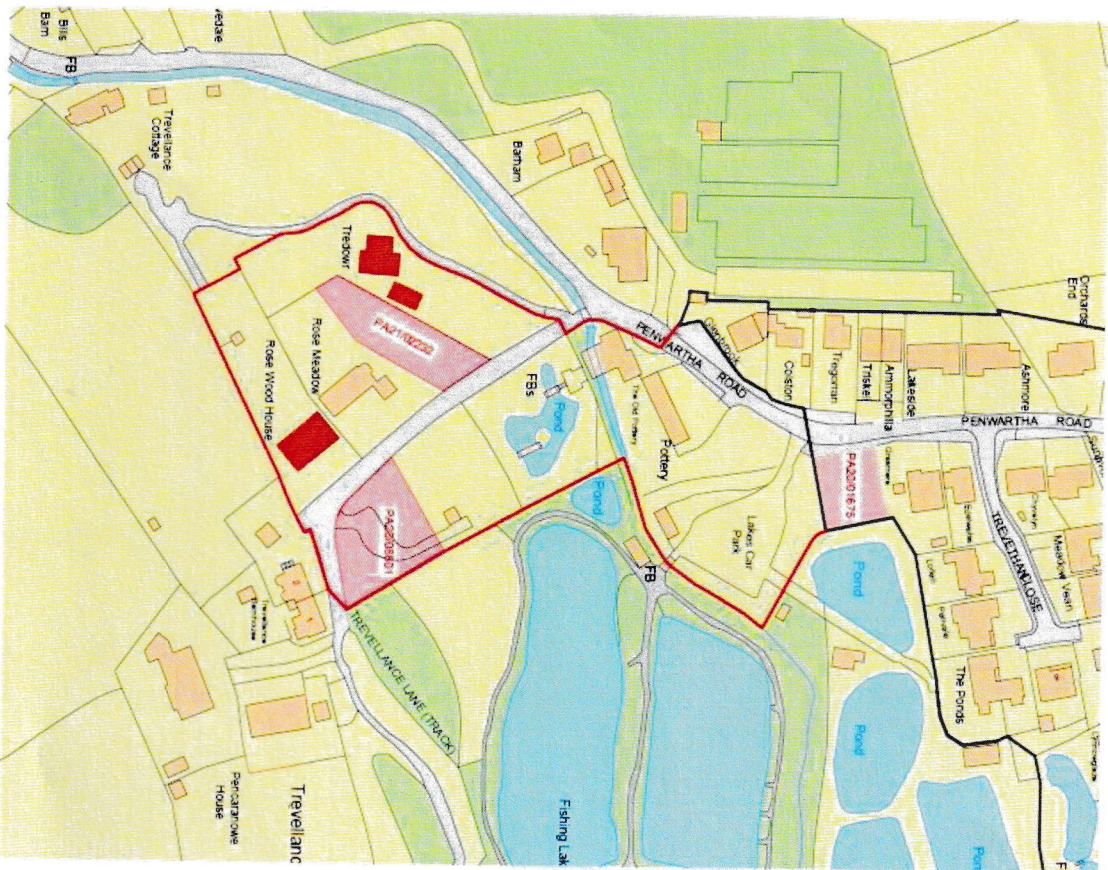
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<sup>3</sup> Microsoft Word - SB Review - 2021-08-31 - notes with CC + Martin Lee comments.docx (perranplan.co.uk) (Page 9)


**ANNEX 1 – Image A**  
**As located in Appendix 2 – Draft Definitive Settlement Boundary Maps (Page 10)**



**ANNEX 2 – Image B**  
**Plan demonstrating the new Developments and the Planning Permissions which lie outside of the NDP Settlement Boundary**



**KEY**  
 NDP Settlement Boundary (SB)  
 New Development S-W Bellingey  
 Proposed New SB for S-W Bellingey

Notes	
Revisions	
Rev Date	Revision Description
0	00/XX/XXXX Original
Client	M/R N DUTSON
Project Address	PERRANZJUBLOE NEIGHBOURHOOD
Drawing Title	SETTLEMENT BOUNDARY ALTERNATIVE PROPOSAL
Job Number	CH19189
Drawing No.	001-GB Rev 0
Scale	1:1250 Paper Size A3
Author	DR CHAKIR SY CH
 <b>Crossley Hill</b> Chartered Surveyors Crossley Hill Chartered Surveyors 28a Green Lane, Trevelance, TR12 2LB trevelance@crossleyhill.co.uk www.crossleyhill.co.uk	