

## Perranzabuloe Policy Matrix – Cornwall Council officer comments Feb 2022

	Policy	Policy title	Comments	Reg 14 Comments
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: <a href="#">Cornwall Design Guide - Cornwall Council</a> 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>	iii) refer to the more up to date <a href="#">Cornwall Design Guide - Cornwall Council</a>
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.	<p>Note comments from CC Environment Officer: The Lead Local Flood Authority has been consulted on the Perranzabuloe NDP. Please note that we cannot provide comments in relation to foul sewer networks are the responsibility of South West Water Ltd and so comments must be provided by them.</p> <p>High level Environment Agency mapping places the Parish in an area which is at risk of groundwater flood risk. The Parish should note that variable infiltration rates and raised groundwater levels can be found throughout</p>

				<p>Cornwall. The Lead Local Flood Authority advises that where development is proposed infiltration testing and groundwater monitoring should be undertaken, and the results of such testing used to inform the drainage design. Failure to complete such testing could result in failure of the drainage systems and place the development approved by this consent and surrounding property at risk of flooding. Where developments proceed without adequate drainage provision, this will be at the developers own risk.</p> <p>Consideration should be given to the attached guidance note and the National Planning Policy Framework (July 2021) paragraphs 159 to 169 (inc). The following links should be of assistance:</p> <p><a href="https://www.gov.uk/government/publications/national-planning-policy-framework--2">https://www.gov.uk/government/publications/national-planning-policy-framework--2</a> <a href="https://www.cornwall.gov.uk/floodrisk">https://www.cornwall.gov.uk/floodrisk</a> <a href="https://www.cornwall.gov.uk/media/h1ynydr/evidence-strategic-flood-risk-assessment-june-2017.pdf">https://www.cornwall.gov.uk/media/h1ynydr/evidence-strategic-flood-risk-assessment-june-2017.pdf</a></p> <p>Further information relating to sustainable drainage systems can be found by following the link below:</p> <p><a href="https://www.susdrain.org/delivering-suds/using-suds/background/sustainable-drainage.html">https://www.susdrain.org/delivering-suds/using-suds/background/sustainable-drainage.html</a></p>
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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  <b>Open market housing, excluding replacement dwellings, will only be supported where there is a restriction to ensure its occupancy as a Principal Residence. 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.</b>  <b>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.</b></p>	No additional comments – the examiner may recommend removal of the policy if they don't think that it is justifiable. You may want to consider an alternative (Perranporth only) policy and have that as back up in the event that the examiner recommends removal, setting out the area that it would apply to and the relevant evidence.
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			<p><b>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.</b></p> <p><b>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.).</b></p>	
6	HO2	Design of Dwellings	<p>NB the new Cornwall Design Guide: <a href="#">Cornwall Design Guide - Cornwall Council</a> 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>	These comments still apply

			<ul style="list-style-type: none"> <li>- Page 15 – the new Cornwall Design Guide is published so references should be updated (3.1)</li> <li>- 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.</li> <li>- page 51 – potential to recognise drainage benefits of green infrastructure (drainage being mentioned at p44, 4.2).</li> <li>- page 55 CA3b would be helpful to explain what a “focal gateway” means.</li> <li>- 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.</li> <li>- page 65 points h and k – it may be helpful to mention that Cornish hedges can contribute to biodiversity network as well as character: <a href="#">Cornish hedge biodiversity - Cornwall Council</a>.</li> <li>- page 68 – NB advice on lighting for NDPs is available at <a href="#">Dark Night Sky Guidance</a>.</li> <li>- 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)</li> </ul>	
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"> <li>• where the green space is in reasonably close proximity to the community it serves;</li> <li>• 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</li> </ul>	We would recommend amending the policy text to reflect that in recently approved NDPs.

			<p>as a playing field), tranquillity or richness of its wildlife; and</p> <ul style="list-style-type: none"> <li>• where the green area concerned is local in character and is not an extensive tract of land.</li> </ul> <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 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	<p>No conflict with LP or emerging CE DPD. Recommend specifying what the lighting measures should be – examples are provided in <a href="#">Dark Night Sky Guidance</a>. 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 expenses 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 <a href="#">Dark Night Sky Guidance</a>.</p>	

19	NE10	Coastal Vulnerability Zone	Seeking further input on these policies and will send separately.	<p>Policy part 1 is in line with the current requirements as set out in our Coastal Change Chief planning officer note and is reflected within the CEDPD policy CC1 with regard to the requirement for Coastal Vulnerability Assessment. However, the policy only requires these within areas as set out in the Cornwall Coastal Vulnerability Map. This seems to require them throughout the parish which goes much further than the DPD policy</p> <p>We'd advise that the policy should limit the CVA to only those developments in the area indicated on the Cornwall Coastal Vulnerability Map.</p>
20	NE11	Development and the Coastal Management Plan	Not sure that this policy is needed – suggest removal.	This is consistent with policy CC2 of the CEDPD but does not add anything – suggest removal.
21	EW1	Renewable Energy and Community Energy Projects	Comments to follow	<p>This is negatively worded policy and there is a conflict with the CEDPD with regard to the identified broad areas which will allow wind turbines in designated areas.</p> <p>I think the first part of the policy needs looking at as well regarding the wording that says the renewable energy schemes will be supported that are owned by the parish, business, or community etc. I think it's a little different from the approach to the DPD and might provide some conflicts.</p> <p>Suggest that you review the draft policy in the CEDPD to ensure conformity.</p>
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.	iii) refers to this policy (TT3) – is this a typo? What is the rationale behind the 75 yard threshold?
26	TT4	Safeguarding the Disused Railway	fine	
27	TT5	Protecting Existing Car Parking Capacity in Perranporth	No conflict with LP or emerging CE DPD.	
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.	W would still advise some consolidation of policy here to reduce the number.

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		To be updated in line with comments from Natural England.
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		
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	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	NE have confirmed that they are happy with the revised text.

		<p>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 <b><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></b></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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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>	

			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.	
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>	Some consolidation of these policies would be helpful.
54	BER11	Perranporth Village Centre Traffic, Circulation and Wayfinding	See above	
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	Some caravan sites could be considered Previously Developed Land; if that is the case some development may be allowed under

			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.	permitted development rights – this would be assessed on a case by case basis. Similarly, any application to remove the holiday conditions would be assessed according to current policy.
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	