

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

	Policy	Policy title	Comments	ST observations and comments	RK'S comments	tirwel comments	NDP SG mtg 29 03'22
1	SD1	Settlement Boundaries	Fine				Leave as is
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>	<p>Up to the SG to decide, although the SD policy is intended to be an up-front marker for sustainability. Refs can be updated.</p>		<p>Not convinced breaking up, would dilute weight of policy. General and expected in any plan.</p>	Leave as is
3	SD3	Reducing the Need to Travel by	Fine				Leave as is

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		Car (Major Development					
4	SD4	Managing Flood Risk from Surface Water Run-off	Seeking additional input – comments to be provided asap.	Awaiting.			Leave as is
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</p>	SG thoughts?	<p><b>A Policy wording:</b> The policy proposed by the CC is the same as the one in the draft except for 4/5 differences. (Reminder: this text is fundamentally the same as found in the St Agnes 'made' NDP).</p> <p>1 A key difference is the change from 'only be permitted' to 'only be supported'. Much weaker. I was going to argue against this change. (Thus: from my perspective, this policy differs in nature from most others in that it is intended to be black-and-white. Viz, when applied, the policy is such that it is not simply a material consideration that is weighed against others when a decision is taken. This is demonstrated by the way it is being applied.) But if 'not be supported' is working in practice in other</p>		The SG agreed to adopt RK's adapted comments.

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			<p>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.</b>  <b>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</b></p>		<p>parishes, then I lose my reason for rejecting that change.  ACCEPT  2 removes the first, introductory clause of the current policy ('Due to the impact.....holiday accommodation (brackets)'; this clause constitutes justification and probably shouldn't be included within a policy.  ACCEPT  3 addition of a sentence '<b>New unrestricted second homes will not be supported at any time.</b>' Firstly, notice that the use of the unqualified phrase "second homes" here loses the clarity intended in the clause deleted in 2) above, to focus the attention on SHs and holiday lets. More broadly, this sentence worries me for several reasons. It repeats the main thrust of the policy. Further the colloquial phrase 'at any time' is an odd rhetorical flourish that</p>		

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			<p>of their time when not working away from home. 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. 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>		<p>has no place in policy writing. (Time, not on weekends, beyond the plan period??) Perhaps it is intended to convey “not under any circumstances”? This could be useful if thus specified. Roger is ambivalent as to how to proceed; perhaps preferable to retain the sentence with “under any circumstances” added as that sounds stronger. Or delete the sentence. Provisionally AMEND 4 Illogical order of sentences. The CC proposal has moved the definition of ‘Principal Residences’ from the second sentence (immediately after the use of the phrase) to the fourth. It seems to me sensible to keep the definition as the second sentence. REJECT Proposed revised wording: <b>Open market housing, excluding replacement dwellings, will only be supported where there is a</b></p>		

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					<p>restriction to ensure its occupancy as a Principal Residence. 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. New unrestricted second homes and holiday lets will not be supported under any circumstances.</p> <p>Sufficient guarantee must be provided of such occupancy restriction through the imposition of a planning condition or legal agreement.</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>All occupiers of homes with a Principal Residence condition will be required to keep proof that they are meeting the obligation or</p>		

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					<p>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) all residents being registered on the local electoral register and being registered for and attending local services (such as healthcare, schools etc.).</p> <p><b>B CCs concern over inadequate justification for a PRP to cover the entire Parish:</b></p> <p>(Just a reminder, for the record) The SG discussed this during its last meeting and decided to leave the policy covering the entire parish, given uncertainty about the availability/existence of further data to support this case and the strength of the community's views during the questionnaire stage of consultation. We</p>		

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					will need to be ready to respond to any call for change that comes from the Examiner in due course.		
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</p>	SG thoughts? Ask AECOM to amend Design Code?		<p>Having asked developers to refer to the Design Code I'm inclined to suggest it is reviewed and updated / strengthened to provide a consistent and relevant level of content throughout. Green and Blue infrastructure are mentioned in one of the other policies with specific mention of Building With Nature principles and awards as an established method of assessing quality of proposals. Ditto Dark Sky policy elsewhere.</p>	<p>Leave for now, but consider at the end of Regulation 14 consultation with any other related feedback. Will at that stage need to refer to AECOM.</p>

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			<p>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"> <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</li> </ul>				

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			<p>what a “focal gateway” means.</p> <ul style="list-style-type: none"> <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</li> </ul>				

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			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;	Assume that they want the criteria amended in line with their comments above and ensure that it aligns with the Design Code if amended?			Refer to AECOM at the end of Regulation 14 feedback. - make sure design guide fits with H03 criteria 2.
8	HO4	Community Homes	Fine		I'm surprised that no comments were forthcoming on this policy, particularly part iii regarding the 100% target for Affordable Housing (AH) which simply repeats policy 9 of the Cornwall Local Plan (CLP), as does the text. But it's not my policy..... so up to others to decide how to respond		Leave as is. (Yes it might be seen as Cornwall Local Plan (CLP) repetition, but the Steering Group felt some of the community would want to see it.)
9	HO5	Housing for Specific Needs	This policy seems to include local residence criteria for accessible homes. If these are not affordable homes,	The policy does not seek to restrict who they are sold to. It might be the	(1) I think possibly Stuart misses the point CC is making. The last part of the policy reads 'and meet		(1) CC point is correct, so yes take on their feedback. (ie delete the last 5 words of

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			you cannot restrict who they can be sold to.	policy title which is misleading? If so, potentially amend to "Housing to Meet the Needs of an Ageing Population"?	local residence criteria'. As I see it, there is no mechanism for restricting accessible dwellings to purchasers that have a 'local connection' unless those dwellings are affordable. So I suggest deleting this part. (2) Wouldn't it be clearer if Policy H05 (2) were to read: "Proposals will be encouraged to provide more than the optional proportion....., to address a shortage of..... "(end). (3) Further than that, I'm surprised to see reference here to optional BR standards rather than the part of Policy 13 of CLP which requires a minimum of 25% accessible dwellings on large sites, something mentioned in the text. BRs are not operational/implementable in planning decision-making, surely? Suggest amending reference, even if this makes it clearer that the policy here duplicates the		clause 2). (2) SG agreed to take on RK's suggested text amend to make it stronger. (3) Leave as is for now, but RK is going to look into this with ST. ST to make the final call as he's the expert. (4) CC don't have to meet it, so it is weak (RK comment). So leave it as is.

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					CLP. (4) More generally, the use of the verb 'encouraged' in the policy is very weak. This leaves the policy with no mechanism for influencing the decision-making process. And suggests that the authors of the policy are merely hoping to appeal directly to developers' good will?.		
10	NE1	Areas of Ecological, Landscape, Biodiversity and Geodiversity Value	Fine				Leave as is
11	NE2	Landscape Character and Landscapes of Local Significance (LLS)	Fine				Leave as is
12	NE3	Embedding Green and Blue Infrastructure into New Development	This is probably better covered in your design guide / policies.	Not sure this is essential to move it though.		Leave as is, and reference in Design Guide. See above comments on design guide, taking out as a policy will simply mean it is ignored.	Leave as is
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	Assume that CC were not sent the appendices or did not find them on		'Wherever possible' is a gift to developers, as they simply have to show retention isn't	Agreed to adopt the suggestion by Lucy. ST to adapt the BS5837:2012

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			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.	the website? Policy could say something "should be, wherever possible" instead of "must"... be retained etc. The last line of policy NE4 1. could be amended to "Development which does not achieve this will not be supported unless alternative green infrastructure is provided on-site and net gains in biodiversity are achieved to create effective habitats and corridors." or similar.		possible! Suggest '...must be subject to a BS5837:2012 Arboricultural Survey to establish condition and RPA. Unless removal is advised within this on a condition basis <u>or</u> is required to achieve access visibility splays all existing trees and hedges must be retained and protected within the design and proactively managed to maintain...' Hopefully more specific. Within supporting text include preference for reusing existing hedge fill for retention of seedbank and walling material, use of native trees and shrubs etc. Use this to also refer to mitigation planting with the presumption this will be on site or within a local, approved, habitat bank site.	reference to also say this "or the updated version of this..."
14	NE5	Biodiversity Net	Not sure that this adds	Strictly speaking the		Agree, leave it in. It's	Leave it in.

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		Gain in New Development	anything to the policies in the CEDPD / Biodiversity SPD? You should ensure that your NDP is adding local priorities that complement Local Plan policies.	NP policies have to be in general conformity with the strategic policies of the Local Plan, not SPDs. I can recheck to see if NE5 adds anything, but I can't see an Examiner removing it for certain if it is in conformity with the LP policies – some might remove it due to repetition, some may not.		expected now.	
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.	I could lift more text from the LLCA although the idea was to signpost it from the text to avoid repetition and length in the Plan. I can take a look to see if there is something which can be lifted and / or reinforce links to the evidence and justification for the gaps being in the LLCA.		Agree re avoiding repetition and it will encourage reading of LLCA which should inform design anyway if proposals are being NPPF compliant.	ST to add in some text to 6.2.2 that makes in clear they need to look at the LLCA to understand the detail and supporting evidence that justifies these policies.
16	NE7	Important Views	No conflict with LP or				

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		and Vistas	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 as a playing field), tranquillity or richness of its wildlife; and</li> <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</p>	<p>They didn't perhaps see the background paper which should allay their concerns about lack of justification? The comments seem to raise concerns about lack of justification, suggesting they only looked at the appendices. As discussed, further contributions from the SG could be made to amplify why proposed LGS are considered as demonstrably special to the local community.</p> <p>Can add reference to the NPPF but disagree with referring to para numbers – they can change – for example, they did only last year – and will do probably this</p>	<p><b>Presentation;</b> personally I found the map in the main document too small to be useful. Yes, there is reference to the Appendix but would it be possible to have a whole page, composite map with say three enlargements for Perran, Goonh and Bol?</p> <p>To be frank, I find the justification for quite a few sites to be very weak. Unavoidable with our resources, no doubt. It wouldn't surprise me at all if the Examiner didn't remove a number of them.</p>		<p>ST to add in some text to signpost those reading this to look at the supporting evidence that justifies these policies.</p> <p>SG to make sure the background paper would show to somebody not familiar with the local area, why it's important. KH to look at this.</p> <p>WR to look at contacting landowners that will be impacted.</p>

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			<p>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. For consistency, I'd suggest amending the policy in line with recent LGS policy wording:</p> <p><i>Suggested Policy text: 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. 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>	<p>year!</p> <p>Examiners are indeed quite strict on LGS being designated but I don't think that this necessitates a change to the policy wording. They will be more concerned initially at least about the justification (i.e. the background paper).</p>			
18	NE9	Dark Skies	No conflict with LP or	Does the SG agree		Hadn't noticed the	ST add in a reference

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			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> .	with the suggestion?		Design Code reference, personally would go with the Cornwall DG suggestion.	to CC mentioned <a href="#">Dark Night Sky Guidance</a> . (into the policy).
19	NE10	Coastal Vulnerability Zone	Seeking further input on these policies and will send separately.	Awaiting.			
20	NE11	Development and the Coastal Management Plan	Not sure that this policy is needed – suggest removal.	Awaiting.			The text of this policy was provided by CC, so SG voted to leave it in.
21	EW1	Renewable Energy and Community Energy Projects	Comments to follow	Awaiting.			
22	EW2	Non-mains Sewer	Comments to follow	Awaiting.			

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		Wastewater					
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.	SG thoughts?			ST to put a comment in TT3 to refer to section 4 of BER2, where we have mentioned it.
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	SG view? Not sure that's the intent of the policy really. However, you could	Roger feels strongly that this 'policy' should be removed. Firstly it is not a policy, rather a goal or		SG conversation. RK withdrew his objection post comments from ST on how this can

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			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. ]	add the point to the policy to strengthen it anyway?	<p>objective. Secondly there is no mention of the relation between this 'goal' and the process of considering planning applications. (e.g. is the idea that planning applications should not be approved 'where existing capacity does not exist?'). Thirdly, it is misleading/ill-informed to suggest that NDPs have any influence on provision of health services, particularly. Education provision is already funded by a specific charge where school places are inadequate to cope with projected increase in pupils, although certainly there is no guarantee of the scale/location/timing of such provision.</p> <p>Consideration of how CIL monies that the parish receives are spent is (I believe) an entirely distinct issue from the above. It is for the parish council to determine how such funds</p>		work depending on the examiner. Also noted was that the plan is already doing some of what CC suggests in lower section 9.3 "Community Actions and Projects".

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					are spent. We were advised by Michael Callan in the early stages of the plan process that there should/would be no role for the NDP in that process. Certainly there is a case to be made that the PC could usefully put the monies in a separate fund, and go on to develop a process to consider (in collaboration with parishioners) possible projects that would offset the negative impact of developments. Perhaps the questionnaire results could help that?.... But that is entirely another story, I would argue.		
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.	Although no suggestion as to how to consolidate!  I can look back through the policies in this section though alongside the LP policy to see if anything should be removed / consolidated. However, as with		Can consolidate the site based ones, but would then be a long and clunky policy. Personal preference when using NDPs in assessment and design would be to keep policies as specific and relevant as possible, makes a consultant's life easier and they're more likely to pay	Leave as is.

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				<p>the other comment re duplication, it's not essential that you remove repetition from the NP, although some Examiners may remove it if CC comments that it's superfluous.</p> <p>I can update HE7 in line with HE SEA comments.</p> <p>HE state:</p> <p><i>"...we note that Policy HE7 - St Piran's Church &amp; Oratory – highlights the importance of the setting of this Scheduled Monument as <b>"one of the Parish's most well known and defining heritage assets"</b>. We are</i></p>		attention!	
35	HE2	Signs and Advertising					Leave as is.
36	HE3	Conservation Areas and Non-designated Historic Settlements					Leave as is.
37	HE4	Historic Landscape Character					Leave as is.
38	HE5	Cornwall and West Devon WHS Area A7 St Agnes Mining District					Leave as is.
39	HE6	St Piran's Church and St Piran's Oratory					Leave as is.
40	HE7	Penhale Camp and Assets within its Boundaries and Setting	Update in line with HE comments				ST to update this in line with CC comments / suggestion. <i>"...we note that Policy HE7....."</i>
41	HE8	Perranzabuloe's Prehistoric Assets and Landscape					Leave as is.
42	HE9	Newly Identified Heritage Assets and Archaeological Remains					Leave as is.
43	HE10	Accessibility to Heritage Assets					Leave as is.

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				<p><i>therefore pleased to see a policy dedicated to preserving its significance. However, the wording of the policy, in sanctioning harm and mitigation, is inconsistent with national policy which has as its presumption the avoidance of harm.</i></p> <p><i>We would therefore advise that if the importance of the Church to the area is to be highlighted that a more appropriate and robust form of wording be used, such as that which forms the basis of Policy HE8 where a</i></p>			

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				<p><i>demonstration that harm will be avoided is required. This would also ensure a consistency in policy approach to the historic environment throughout the Plan."</i></p> <p>I can make the adjustment as suggested.</p>			
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.	SG comments?			SG do want the focus to be on the identified key employment areas. So no change to be made.
45	BER2	Quality Employment Premises	Add a further condition to the list in iii) h) heritage assets	No reason why not. I can make the change.			Yes, adopt the suggestion.
46	BER3	Expansion of Employment Sites	Add a further condition to the list in iii) h) heritage assets	No reason why not. I can make the change.			Yes, adopt the suggestion.
47	BER4	New Technology	Does this policy apply	I can introduce			SG agreed to let ST do

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		and Hi-tech Industries	anywhere within the parish? Suggest clarification about impact on landscape etc.	some criteria to provide the reassurance, assuming it is the intention to apply the policy across the Parish.			this.
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?	Does the SG wish to broaden to other small and micro businesses?			ST to amend so that it applies to all 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 development, usually housing. We note that there are no housing site allocations proposed but our attention is drawn to Policy BER8. Although	HE suggested change highlighted below. I can make the adjustment.  <b>Policy BER8: Business Opportunity Areas</b>  <b>1. The Business Opportunity Areas identified on Maps 22,23 and 24 are our preferred indicative locations for the expansion of employment</b>			Suggestion of sub point 6.  SG agree that this be added.

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			<p>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</p>	<p>premises where provision cannot be made within the settlement boundaries. These areas are not allocated sites but indicate an “in principle” preference.</p> <p>2. Development proposals for E(g)(i), E(g)(ii), E(g)(iii), B2 and B8 and related Sui Generis uses of a scale not appropriate in the defined settlement areas will be supported within the indicative Business Opportunity Areas (see Map 24) where they:</p> <p>i) demonstrate demand for the proposed use;</p> <p>ii) complement and do not directly compete with</p>			

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			<p>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> <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</p>	<p>existing vacant employment space of a similar type in Perranporth;</p> <p>iii) demonstrate that the proposed use will create employment opportunities for residents of the Parish;</p> <p>iv) meet the requirements of Policy BER2: Quality Employment Premises and Policy BER3: Expansion of Employment Sites; and,</p> <p>v) meet the requirements of Local Plan Policy 5.2.</p> <p>vi) can demonstrate that the development will not cause harm to heritage assets.</p>			

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			<p>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</p>				

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			<p>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.</p> <p>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</p>	<p>The policy does say "(which require planning permission)" so it should be clear enough. That also future proofs it should PDRs be extended further. Does the SG agree with the suggestion re 4.?</p> <p>Does this suggestion meet the SG's expectations of the policy? I can simplify on the basis suggested if so.</p>			<p>Para 4 is intended to make sure ground floor level stays business use. This is vital and key for Perranporth Village Centre.</p> <p>ST to look at giving emphasis to this in the text.</p>

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			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>	<p>National guidance suggests that succinct policies are preferred in NPs, so arguably, 5 shorter policies are more appropriate that one long one! What is the SG view?</p> <p>I wouldn’t suggest adding ref to a doc which does not yet formally exist – it may never happen! If it still does not exist when the Plan is Examined, the Examiner will remove the reference. Suggest adjusting when the doc has been published and not until then.</p>			SG agreed to leave as separate.
54	BER11	Perranporth Village Centre Traffic, Circulation and Wayfinding	See above				SG agreed to leave as separate.
55	BER12	Perranporth Village Centre Areas of Intervention	No conflict with LP or emerging CE DPD.				SG agreed to leave as separate.
56	BER13	Retail Expansion in Perranporth, Goonhavern and	See above				SG agreed to leave as separate.

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		Bolingey					
57	BER14	Provision for (Consumer) Waste Facilities at Hot Food Takeaways in Perranporth, Goonhavern and Bolingey	See above				SG agreed to leave as separate.
58	BER15	Supporting Community Shops, Food and Drink Premises and Services	See above				SG agreed to leave as separate.
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.	I can compare and review if the SG agrees with the sentiment of the comment.			SG view is that if a caravan or camping etc site stops serving that function, it returning to being a wild (undeveloped) site.
60	TO2	New Built Tourist and Visitor Accommodation (Bed and Breakfast, Hotels, Guest	fine				

	Policy	Policy title	Comments	ST observations and comments	RK'S comments	tirwel comments	NDP SG mtg 29 03'22
		Houses and Purpose-built Holiday Lets and Lodges)					
61	TO3	Broadening the Visitor and Tourism Offer through Sustainable and Wet Weather Attractions	fine				

Climate Emergency Draft DPD – this contains draft new planning policies that will apply across Cornwall to help tackle climate change issues. Consider whether the policies in this DPD will address the issues / ambitions in your plan. There is likely to be scope to remove some of your policies as they will be addressed by the policies in here. If this is the case, please remove the policies in your plan to remove duplication. [Climate Emergency Development Plan Document - Cornwall Council](#) and biodiversity guide [Planning for Biodiversity \(cornwall.gov.uk\)](#) and Environmental Growth Strategy [Environmental Growth Strategy | Let's Talk Cornwall](#)

The Cornwall Design Guide - [Cornwall Design Guide - Cornwall Council](#)