



Cornwall Local Plan: Strategic Policies Statement of Representations

**Cornwall Council
January 2016**

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January 2015

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1. Introduction

i) Purpose of this document

The Town and Country Planning (Local Planning) (England) Regulations 2012 under Part 6, Regulation 17d. requires the Local Planning Authority to include amongst its proposed submission documents a statement setting out:

- (i) which bodies and persons were invited to make representations under regulation 18
- (ii) how those bodies and persons were invited to make such representations
- (iii) a summary of the main issues raised by those representations and
- (iv) how those main issues have been addressed in the DPD

This document contains an overview of representations received in the preparation of the Cornwall Local Plan: Strategic Policies document up to and including consultation on the Pre- submission stage. The summaries of representations are brief, but links to the full schedules of representations and to Response Reports to the Council's OCabinet are included in the document.

ii) Development stages of the Cornwall Local Plan: Strategic Policies

Document	Consultation dates
Sustainability Appraisal Scoping Report	20 th May 2009
Topic Papers and Place Based Papers	27 th July – 28 th August 2009
Core Strategy Options	7 th February – 28 th April 2011
Core Strategy Preferred Approach Options and Preferred Options for Minerals, Waste and Energy	9 th January – 2 nd March 2012
Local Plan: Strategic Policies Pre-Submission Document March 2013	11 th March – 22 nd April 2013
Local Plan: Strategic Policies proposed Submission Document March 2014	17 th March – 28 th April 2014
Local Plan: Strategic Policies Schedule of Focused Changes September 2014	4 th September - 16 th October 2014

Please note that the name of the document changed from Core Strategy to Local Plan, to be consistent with the National Planning Policy Framework which was published in March 2012.

2. Notification under regulation 18

According to Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012:

- (1) A local planning authority must—
 - (a) notify each of the bodies or persons specified in paragraph (2) of the subject of a local plan which the local planning authority propose to prepare, and .
 - (b) invite each of them to make representations to the local planning authority about what a local plan with that subject ought to contain.

- (2) The bodies or persons referred to in paragraph (1) are—
 - (a) such of the specific consultation bodies as the local planning authority consider may have an interest in the subject of the proposed local plan; .
 - (b) such of the general consultation bodies as the local planning authority consider appropriate; and .
 - (c) such residents or other persons carrying on business in the local planning authority's area from which the local planning authority consider it appropriate to invite representations.

- (3) In preparing the local plan, the local planning authority must take into account any representation made to them in response to invitations under paragraph (1).

In accordance with Regulation 18 Cornwall Council started by preparing a set of draft issues papers in 2009 on a range of topics to explore the issues that the Core Strategy should address. The issues papers were written by Cornwall Council officers with significant input from key stakeholders and experts. The topics covered were:

1. Biodiversity & Geodiversity
2. Climate Change
3. Maritime and the Coast
4. Local Economy & Regeneration
5. Crime and Anti-Social Behaviour
6. Design and Efficient Use of Resources
7. Education and skills
8. Energy
9. Flooding, drought and water consumption
10. Health
11. Historic Environment
12. Housing
13. Landscape and Seascape
14. Minerals
15. Population
16. Retail and Town Centres
17. Social Inclusion
18. Soil, Air and Water Quality
19. Sport, Recreation and Open Space
20. Tourism

- 21. Transport & Accessibility
- 22. Waste

i) How representations were invited:

The consultees were sent all 22 topic papers and a response form on the 27th July 2009 and given until 28th August 2009 to respond. The following organisations and people were consulted on the topic papers to ask their opinion on the main spatial planning issues for the Core Strategy to consider:

Environment Agency
Cornwall Partnership Trust
Cornwall Primary Care Trust
Natural England
South West Water
Sport England
English Heritage
Government Office for the South West
Commission for Architecture and the Built Environment (CABE)
RIGS group
SouthWest Regional Development Agency (SWRDA)
Home Builders Federation
Country Landowners
Regional Assembly
Learning Skills Council

Air Quality Unit, Cornwall College
Cornwall and Isles of Scilly Coastal Advisory Group
Cornwall and Isles of Scilly Learning and Skills Council
Cornwall AONB Unit
Cornwall Marine Network
Cornwall Development Company
Cornwall Sea Fisheries
Cornwall Sustainable Tourism Project (CoaST) –
Cornwall Wildlife Trust
Devon and Cornwall Police
Inclusion Cornwall
Tamar Estuaries Consultative Forum

Cornwall Council Consultees:
Children, Young People and Family Services
Community Safety
Environmental Protection
Economic Development
Environment Service
Harbour Commissioners
Housing
Historic Environment
Low Carbon Unit
Planning, Transportation and Estates
Play Strategy
Youth Offending

ii) Summary of Main Issues Raised:

Responses generally provided more specialist detail on the individual topic papers.

An example of which under the health paper was that as fuel prices rise some existing facilities may become 'inappropriately placed' leading to only a minority being able to access them. As this is a strategic issue the health paper was amended to contain this issue.

Often consultees requested issues to be included that were already included in a separate topic paper or suggested detail that was not strategic enough for the Core Strategy.

iii) How have the issues been addressed by the Council:

Responses provided more specialist detail on the individual topics and where these were considered to be strategic to Cornwall and the production of the Core Strategy the papers were amended and informed the contents of the Core Strategy Issues and Options consultation document.

Where responses were outside the scope of the Core Strategy or were not strategic, the comments were noted but no change was made to the document.

The neighbouring authorities that border or have key strategic interests with Cornwall are Dartmoor National Park Authority, Devon County Council, Plymouth City Council, Torridge District Council, South Hams District Council, West Devon Borough Council and The Isles of Scilly Council. Details of how we have consulted and involved neighbouring authorities will be given in our Statement on the Duty to Cooperate on Sustainable Development.

3. Sustainability Appraisal Scoping Report

i) How representations were invited

Stakeholder workshop: 9th December 2008

Stakeholders included officers from various departments of the council, statutory consultees (the Environment Agency, Natural England, English Heritage and Government Office of the South West) and members of the Local Area Partnership.

Ongoing engagement with stakeholders: December 2008 – March 2009

Report to Local Development Framework Member Working Group: 26th March 2009

Stakeholder consultation launched: 20th May 2009

Fifty six stakeholders were invited to comment, including SEA statutory consultees the Environment Agency, Natural England and English Heritage. Other consultees included the South West Regional Development Agency, South West Water, Government Office for the South West, Cornwall Enterprise, Cornwall College, Local Strategic Partnership members, the Volunteer Sector and council officers from natural and historic environment, maritime, community strategy and transport departments.

ii) Summary of the main issues raised

217 comments were received from 19 consultees.

Of these, 56 comments (26%) pointed out typographical errors or suggested minor corrections or updates and the Council made all these suggested minor amendments.

62 comments (29%) requested that information be included, which was already included in the document.

41 comments (19%) suggested that information be included although it was proposed not to make these amendments. In the majority of cases, this was because the suggested amendments were beyond the remit of the scoping report, as discussed above, being either management issues, suggestions for policy which were more appropriate to later stages of the Core Strategy/ Development Plan Document or too detailed for the scoping report.

23 comments (11%) were statements, which were not contrary to the objectives of the report, but which did not request or give rise to the need for amendment.

18 comments (8%) suggested amendments which were proposed to incorporate into the document. These included amending two sustainability objectives to make them more clear and succinct, adding more strategic and relevant decision making criteria and indicators and in some cases reducing the number of

indicators. It was felt that all these amendments improved the document and made it more robust.

17 comments (8%) were about the format of the document or the process undertaken. Common themes were: concerns that presenting the document as separate topic papers meant that an integrated approach would not be taken and the interrelated nature of many of the topics would be overlooked; Climate Change should not be treated as a separate topic; Maritime should not be treated as a separate topic.

7 comments (3%) praised the document. It should be noted that all the statutory consultees commended the document for its clarity, content and presentation.

An overview of the responses to consultation were reported to Environment, Heritage and Planning Portfolio Advisory Committee On 9th November 2009 (Agenda item no 5) and the report can be viewed here: <https://democracy.cornwall.gov.uk/ieListDocuments.aspx?CId=663&MIId=2120&Ver=4>

There are two appendices to the report, which provide a more detailed summary of the issues. Appendix 1 contains the list of consultees and comments <https://democracy.cornwall.gov.uk/documents/s13465/Cornwall%20Local%20Development%20Framework%20Sustainability%20Appraisal%20Scoping%20Report%20-%20Appendix%201.pdf>

and Appendix 2 looks at Sustainability Objectives. <https://democracy.cornwall.gov.uk/documents/s13466/Cornwall%20Local%20Development%20Framework%20Sustainability%20Appraisal%20Scoping%20Report%20-%20Appendix%202.pdf>

iii) How the main issues were addressed

Preparation of the draft scoping report followed both the regulations and good practice guidance. There was meaningful engagement and consultation of stakeholders, which shaped and altered the document.

The draft Scoping Report was recommended as a good example by Government Office of the South West and all statutory consultees (Environment Agency, Natural England and English Heritage) agreed that the document was consistent with guidance.

The draft scoping report provided a sound basis for testing Development Plan Documents and allowed for timely progress on the Core Strategy and other documents.

A revised SA with amendments in response to the consultation was adopted at a subsequent Planning Policy Advisory Panel meeting on the 14th January 2010.

<https://democracy.cornwall.gov.uk/documents/s15707/Cornwall%20Council%20Local%20Development%20Framework%20Sustainability%20Appraisal%20Scoping%20Report.pdf>

4. Core Strategy Options Paper

i) How representations were invited

We undertook a public consultation on the Core Strategy Options Paper from 7th February – 28th April 2011, asking two questions:

- How much growth should Cornwall plan for?
- Where should it be located?

There were three growth options: Low (38,000) Medium (48,000) and High (57,000) and three distribution options: Cornwall Towns, Dispersed and Economy led. The document was supported by the Community Network Area Based Discussion Paper, exploring what each option would mean for Cornwall's 19 community network areas.

This can be viewed by visiting:

<http://www.cornwall.gov.uk/media/3639109/Core-Strategy-Options-Paper.pdf>

All options were tested through a sustainability appraisal in terms of the housing growth options: summary, detailed growth options and analysis of trends, and housing distribution Sustainability Appraisal plus a Habitats Regulation Assessment (including maps for the Cornwall Towns, Dispersed and Economy Led distribution options).

These can be viewed by visiting:

Summary Options Appraisal

<http://www.cornwall.gov.uk/media/6601329/AppraisalHousing-GrowthTrafficLights1008-3-.pdf>

Detailed Options Appraisal

<http://www.cornwall.gov.uk/media/6601333/Sustainability-Appraisal-of-growth-options-detailed.pdf>

Analysis of Trends Appraisal

<http://www.cornwall.gov.uk/media/6601337/Sustainability-Appraisal-of-growth-options-overall-analysis-of-trends.pdf>

Distribution Sustainability Appraisal

<http://www.cornwall.gov.uk/media/3639111/Sa-Consultation-version-Jan-2011.pdf>

HRA Screening Report

<http://www.cornwall.gov.uk/media/3639112/Cornwall-CS-HRA-Screening-Draft-270111-no-web-links.pdf>

<http://www.cornwall.gov.uk/media/3639113/Figure-4-European-Designated-Sites-Option-1-Cornwall-Towns.pdf>

<http://www.cornwall.gov.uk/media/3639114/Figure-5-European-Designated-Sites-Option-2-Dispersed-Distributions.pdf>

<http://www.cornwall.gov.uk/media/3639115/Figure-6-European-Designated-Sites-Option-3-Economy-Led-Distribution.pdf>

The consultation ran for 12 weeks and representations were sought in the following ways:

- All statutory consultees and over 1,000 contacts on our database were notified
- Presentations to all 19 Community Network Area meetings. These are administrative areas based around groupings of parishes and electoral divisions.
- Formal Press notices in the Cornish Guardian, West Briton and Cornishman (9.02.11)
- Press release (7.02.11)
- Website and electronic communications: all documents available to view and comment on dedicated webpage with link from front page and links to documents and reports in evidence base. Facebook and Twitter were also used.
- Hard copies were sent to all stakeholders who requested them, distributed to town and parish councils and made available in all of Cornwall's 32 libraries and 22 one stop shops.
- 17 exhibitions were held in supermarkets around the County
- Postcards were distributed to local shops to raise awareness of the consultation, particularly targeting villages that do not have libraries or one stop shops and where exhibitions were not held

We attended, exhibited and presented at the following stakeholder meetings:

- Launceston Community Network Area event (20.1.11)
- Developer Forum – Truro (16.2.11)
- Cornwall Housing Partnership (3.3.13)
- Exhibition to environment Agency Staff (6.3.13)
- Infrastructure Providers Group workshop (3.11)
- St Mewan Parish Council (21.3.11)
- Bodmin Moor Parishes Network (7.4.11)

ii) Summary of main issues raised

- Economy: there was concern about how jobs would be provided and a desire to see a focus on job provision rather than housing growth.
- Infrastructure: a fear that development would not be supported by appropriate infrastructure.
- Second Homes: a desire to see a reduction in the number of second homes in Cornwall, particularly in areas with high percentages of second and empty homes.

- Affordable and Local Needs housing: strong support for local needs housing but a fear that it will not be properly restricted to local people and that 'affordable housing' isn't actually affordable.
- Distribution: a 'one size fits all' distribution isn't appropriate for Cornwall and there needs to be a combination of the proposed options to respond to different local needs.
- Natural and Historic Environment: concerns raised about the effect of the levels of growth on the environment and the potential detrimental effect on Tourism.

Written responses support for the proposed growth options were:

Low: 47% support
 Medium: 17% support
 High: 36% support

Exhibition responses support for the proposed growth options:

Low: 29%
 Medium: 42.5%
 High: 28.5%

Written responses for proposed distribution options:

Towns: 34%
 Dispersed: 38%
 Economy Led: 28%

Exhibition Responses for proposed distribution options:

Towns: 27.5%
 Dispersed: 48%
 Economy Led: 22%
 Other: 2.5%

The full response schedules can be viewed on the Cornwall Council Website here: <http://www.cornwall.gov.uk/default.aspx?page=32790>

The response report to Cabinet is available here as part of the Planning Policy Advisory Panel meeting of 24th June 2011 (Agenda item 6): <https://democracy.cornwall.gov.uk/ieListDocuments.aspx?CIId=663&MIId=3609&Ver=4>

iii) How the main issues were addressed in the Local Plan

In order to make decisions on the growth levels and distribution, several meetings were held with the Council's Planning Policy Advisory Panel (PPAP) and wider Council members, at these the consultation responses were broken down by Parish and Community Network Area so that Members could see the responses and preferences by area across Cornwall and could choose an option that reflected local views, expressed in the consultation.

A growth target of 48,000 was agreed for the next iteration of the document (Preferred Approach.) The distribution pattern was to focus on regeneration areas Camborne, Pool and Redruth and Newquay Airport Enterprise Zone, and on the main towns, to support economic growth, but also to allow a flexible framework in the Community Network Areas, to enable local communities to influence distribution in their areas.

PPAP and Cabinet reports on the iterations of the Preferred Approach are here: <https://www.cornwall.gov.uk/environment-and-planning/planning/planning-policy/adopted-plans/cornwall-local-plan-strategic-policies/core-strategy-options-report/>

5. Planning Future Cornwall: Our Preferred Approach for a Core Strategy and Options and Preferred Options for Minerals Waste and Energy

i) How representations were invited

Consultation ran between 9th January and 2nd March 2012. The document contained 8 specific questions:

- Q1. Will the Strategy achieve the vision? What would be better and why?
- Q2. Does the policy intent ... achieve the objectives of the plan?
- Q3: Which level of growth would you prefer to see in Bodmin?
- Q4. Which level of growth would you prefer to see in Saltash?
- Q5. Do you think we have got the right balance with the spread of development across Cornwall?
- Q6. What are the top 3 objectives for your Community Network Area?
- Q7. Does this provide the framework to develop your own plans?
- Q8. Do we need to consider new settlements?

This can be viewed by visiting:

Our Preferred Approach for a Core Strategy:

http://www.cornwall.gov.uk/media/3639832/Planning_Future_Cornwall_-_Preferred_Approach_for_a_Core_Strategy_5457093397841335282.pdf

Options and Preferred Options for Minerals Waste and Energy:

http://www.cornwall.gov.uk/media/3639850/Options_and_PREFERRED_Options_for_Energy_Minerals_and_Waste_4622263885648799116.pdf

The consultation was accompanied by the Preferred Approach Sustainability Appraisal, Alternative Options and Habitats Regulations Assessment.

These can be viewed by visiting:

Preferred Approach Sustainability Appraisal:

Part One:

<http://www.cornwall.gov.uk/media/3639851/SA-Report-Planning-Future-Cornwall-Preferred-Approach-Final-Dec-2011-Part-1.pdf>

Part Two:

<http://www.cornwall.gov.uk/media/3639852/SA-Report-Planning-Future-Cornwall-Preferred-Approach-Final-Dec-2011-Part-2.pdf>

Options and Preferred Options for Minerals Waste and Energy Sustainability Appraisal:

http://www.cornwall.gov.uk/media/3639850/Options_and_PREFERRED_Options_for_Energy_Minerals_and_Waste_4622263885648799116.pdf

Alternative Options:

http://www.cornwall.gov.uk/media/3639854/Alternative_Options_-_draft_9-12-11.pdf

Habitats Regulations Assessment:

<http://www.cornwall.gov.uk/media/3639857/Cornwall-HRA-screening-January2012.pdf>

The consultation was publicised and representations were invited in the following ways:

- All specific and general consultation bodies and over 1,000 contacts on our database were notified
- Formal press notifications in the Cornishman, Cornish Guardian, West Briton, Cornish Times and Cornwall and Devon Post (4th/5th January 2012)
- Press release 3rd January 2012
- Website and electronic communications: all documents available to view and comment on dedicated webpage with link from front page and links to documents and reports in evidence base. Facebook and Twitter were also used.
- Radio: roadshows were publicised on BBC Radio Cornwall and the Member for Housing and Council Officers took part in a phone-in. Dates of consultation events were also available to view on the 'Pirate FM' website
- Copies of the document were available to view in all libraries and one Stop Shops and Posters were used to highlight the consultation in these venues
- Postcards were distributed to over 60 local shops and post offices located in villages that did not have a library, a roadshow event or a One Stop Shop
- The 'Cornwall Conversations Panel' were emailed details of the consultation and all the roadshow events
- During the consultation the local papers ran numerous stories highlighting both the overall strategy and specific local issues
- The consultation was publicised in 'Team Talk' which reaches approximately 10,000 members of staff and emailed to all officers with a Cornwall Council online account – approximately 2,500 people
- 27 roadshows were held at major towns across Cornwall – these events ran from 12-7pm and were held in community halls or empty shops. Questionnaires were distributed at these events:

Wadebridge Town Hall (9.1.12)
Redruth, Boots old shop (9.1.12)
Helston, Guildhall (Corn Exchange) (11.1.12)
Falmouth, Town Council (12.1.12)
Saltash, Guildhall (13.1.12)
Camborne, Wesley Chapel (16.1.12)
Camelford, Camelford Hall (16.1.12)
Penzance, St. John's Hall (large hall) (17.1.12)
Pool, Innovation Centre (18.1.12)
Roche, Village Hall (18.1.12)
Penryn, Town Council (19.1.12)
St Blazey, Alexander Hall, Middleway (19.1.12)
Launceston, Town Hall (20.1.12)
Bude, Parkhouse Centre (23.1.12)
Lostwithiel, Community Centre (25.1.12)

Truro, Library (25.1.12)
Carbis Bay, Memorial Hall (26.1.12)
Newlyn, The Centre (27.1.12)
St Ives, Concert Hall (Guildhall) (27.1.12)
Callington, Town Hall (31.1.12)
Hayle, Passmore Edwards Inst. (31.1.12)
St Austell, Committee Room, One Stop Shop (1.2.12)
Liskeard, Town Hall (public hall) (2.2.12)
Bodmin, Shire House Suite (3.2.12)
Perranporth, Memorial Hall (6.2.12)
St Stephen, Community Centre (6.2.12)
Newquay, St Michaels Church Hall (24.2.12)

We attended and/or presented at the following stakeholder meetings to give information, publicise the plan and consultation and invite discussion and responses:

- Cornwall Gateway CNA meeting (10.1.12)
- Probus Parish Council (12.1.12)
- Veryan Parish Council (16.1.12)
- St Blazey and Clay Country CNA meeting (23.1.12)
- Cornwall Rail Forum (31.1.12)
- Bodmin Town Council (1.2.12)
- Mining Parishes CNA meeting (2.2.12)
- Deviock, Duloe and Lanreath, Morval and Pelynt (5 parishes) meeting (7.2.12)
- Trelawney Alliance (10.1.12)
- Two focus groups facilitated by Planning Advisory Service (15.2.12)
- Fal Energy Partnership (19.2.12)
- Highways Agency (21.2.12)
- Environment Agency (22.2.12)
- Feock Parish Council (22.2.12)
- Cornwall Business Partnership (27.2.12)
- Sheviocck Parish Council (29.2.12)
- Natural England (29.2.12)
- Cornwall Design Panel (29.2.12)
- Bodmin Community Network Area meeting (30.2.12)
- English Heritage (23.3.12)

24th April 2012 - Statement from Planning Advisory Service on our preferred approach consultation

On review of the approach outlined undertaken for consulting on the Core Strategy we consider that the activities and opportunities for the public to engage with the information and to provide comments and recommendations on the emerging plan are credible and well thought out.

Given the scale of the Council area as a Unitary Authority, any required consultation was always going to prove a challenge, when providing a comprehensive set of opportunities to engage with the community. However, with the range of approaches and supporting activities outlined within the

consultation strategy we believe that Cornwall Council have gone beyond the requirements in order to make the consultation approach accessible to all and fit for purpose.

The range of activities employed and the number of physical areas covered with the roadshows and meetings, benefitted from the additional supporting activities that took place such as the radio slots, postcards administered to local businesses, press releases, web updates and facebook feeds identify to the reader that a comprehensive and thorough campaign was thought through and delivered in an effective and open manner.

Utilising the extended period of the consultation process to engage and consult with as many organisations and groups as possible certainly provided opportunities for these bodies to advocate involvement within the consultation process and the importance of the Core Strategy. The reporting and use of consultation comments will be critical to the final evolution of the Core Strategy prior to publication.

ii) Summary of main issues raised

Grouping the responses into broad themes, the top three issues identified were:

- Economic growth
- Protection of the Environment
- Affordable housing

There was a strong feeling that growth should be economy led and that jobs should be provided first, with housing growth to follow. There was concern that the level of growth was too high and would be detrimental to the environment. Affordable housing was seen as a priority for most areas.

Other popular issues raised were:

- Transport – provision of public transport and reducing the need to travel
- Sustainability of rural settlements and provision/protection of services
- Protection of town centres
- Infrastructure provision
- Health
- Design quality

For the questions relating to specific towns, the higher level growth was supported in Bodmin by the majority who responded to the questionnaire, but a petition opposing it was also received. In Saltash the higher level of growth was not supported and there was a feeling that Torpoint should also have an allocation. The concept of stand alone eco-town new settlements was not supported.

Regarding the distribution of development, residents of towns where a higher amount of growth was proposed generally raised the most objections. Equally there were objections from landowners and house builders who suggested that the targets were too low and would not meet demand or affordable housing needs. Comments on the Community Network Area papers have fed into the strategic policy development where they relate to strategic growth and

distribution and more specific comments into Town Framework and CNA paper development.

Other prevalent general comments were:

- The policy intent was too vague and not expressed in a way that would be enforceable
- More detail needed on affordable housing
- More housing is required to meet need
- Community Infrastructure Levy (CIL) must be subject to viability testing or it will stifle development
- Focus is too urban – need more emphasis in sustainable rural policy
- How will the '1 job per dwelling' be achieved?
- Need reference to tourism/agriculture/flooding/health and wellbeing
- Landscape and environment reference should be in all policies
- Historic environment and natural environment should be dealt with in separate policies
- Minerals policy needed

Renewable Energy

Comments supported a renewable energy target 25% higher than the figure supported by our resource assessment of the renewable energy potential in Cornwall. The preferred means of managing deployment of renewable energy was through a criteria policy (rather than by identifying broad areas for wind). The need to encourage community based renewable energy schemes was highlighted as being important. The Renewable Energy Industry raised the need for policy to safeguard the efficiency of strategic renewable energy installations from future development.

Minerals

In terms of the various mineral sectors, the majority of respondents felt that china clay should be focused on the St Austell area and that market-demand would dictate primary aggregate production. Respondents generally felt that secondary aggregates should be encouraged and that selected china clay waste sites should be safeguarded for use of those secondary aggregates. It was generally felt that recycling of material for the production of recycled aggregates should take place at waste management sites and active quarries. The majority of respondents also felt that sites should be allocated for the bulk transport of minerals and that sites for that transport should be safeguarded. Although there was support for building stone extraction it was felt that by limiting production within the AONB and WHS to 'small scale and limited duration' would make extraction uneconomical. Safeguarding of the various mineral sectors was supported along with the consideration of the need for a 'buffer zone' around mineral safeguarding areas

Waste

While responses were mixed, the general message was that landfill should be minimised and managed close to the source of the waste through a criteria-based policy framework. There was some localised opposition to extending

existing mixed waste landfill sites. High levels of recycling and recovery were supported where facilities are developed close to the source of the waste and managed through a criteria-based policy framework.

The full response schedules can be viewed here:

<http://www.cornwall.gov.uk/default.aspx?page=32791#Consultation>

iii) How the main issues were addressed in the Local Plan

A working group of the Council's Planning Policy Advisory Panel (PPAP) was set up to workshop the development of the document with members, reporting back to the main PPAP group, allowing extra meetings to be held to go through the issues in detail. Waste matters were also considered by the Council's Waste Development Advisory Panel

The Preferred Approach document contained policy intent rather than policy wording and the Preferred Options document for energy minerals and waste contained options regarding the policy approach: the Pre-Submission document contains the full policy wording for all strategic issues including minerals, waste & energy. It also has added housing policies, which give further detail on enabling affordable housing in rural areas.

Historic and natural environment policies are were separated and were expanded and revised through discussion with key stakeholders, especially English Heritage, Cornwall Council's own Historic Environment Officers and Natural England.

There is a health and wellbeing policy in the Pre-Submission document and references to tourism, flooding and protection of agricultural land were added.

A revised growth target was proposed in Bodmin, with the support of the Town Council. A lower figure was proposed for Saltash and a target identified for Torpoint. The concept of a stand alone Eco settlement was not been carried forward.

With regards to the urban/rural balance, the Pre-Submission document has been written to factor in flexibility to enable the delivery of more development to meet local needs, if it is supported by the local community.

For renewable energy a criteria-based approach rather had been developed with renewable energy development being assessed against all policies in the Local Plan. A safeguarding policy was proposed as well as policy encouraging and recognising the importance of community energy schemes.

For minerals a supportive approach was taken to the minerals industry, recognising the wealth of different minerals produced in the County and the importance to sustainable growth. The general principles guiding minerals development will be set out in the Local Plan and further detailed policies including site allocations will be included within the forthcoming Minerals Plan. Whilst recognising the importance of the AONB and WHS, it is felt that appropriately scaled extraction within those areas would be acceptable.

The principle of waste and landfill minimisation will be embedded in the policy framework. This framework will take the form of criteria-based policies to be met by applications for both new and changes to existing waste management facilities, rather than site allocations. The policies will include general support for recycling. The same will apply to energy recovery where management processes that are higher up the waste hierarchy are not practicable.

Two strategic policies have been added for each of energy, minerals and waste.

PPAP and Cabinet reports to meetings held throughout 2012 on the development of the Pre-Submission document can be viewed here:

<https://democracy.cornwall.gov.uk/ieListMeetings.aspx?CIId=663&Year=2013>

The response report was made to Cabinet on 28th September 2012 and the report is item 5 on this agenda:

<https://democracy.cornwall.gov.uk/ieListDocuments.aspx?CIId=663&MIId=4321&Ver=4>

6. Cornwall Local Plan: Strategic Policies 2010-2030 Pre-submission document March 2013 – Notification under Regulation 19

According to Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012:

Before submitting a local plan to the Secretary of State under section 20 of the Act, the local planning authority must—

(a) make a copy of each of the proposed submission documents and a statement of the representations procedure available in accordance with regulation 35, and
(b) ensure that a statement of the representations procedure and a statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected, is sent to each of the general consultation bodies and each of the specific consultation bodies invited to make representations under regulation 18(1).

i) How representations were invited

We undertook consultation on the Cornwall local Plan: Strategic Policies 2010-2030 Pre-submission document from 11th March – 22nd April 2013.

This can be viewed by visiting:

<http://www.cornwall.gov.uk/media/3623323/Local-Plan-Strategic-Policies-March-2013.pdf>

The consultation was accompanied by the Pre-submission Sustainability Appraisal and Habitats Regulations Assessment.

These can be viewed by visiting:

Pre-submission Sustainability Appraisal

<http://www.cornwall.gov.uk/media/3623321/Sustainability-Appraisal-Jan-2013.pdf>

Addendum to Sustainability Appraisal Update to Submission Draft
Report January 2013

<http://www.cornwall.gov.uk/media/3633086/SA-Addendum-Jan-2013-Final.pdf>

Addendum to Sustainability Appraisal Update to Local Plan Pre –
Submission Consultation Version February 2013

<http://www.cornwall.gov.uk/media/3623322/SA-Addendum-March-2013-final-for-consultation- 2 .pdf>

Habitats Regulations Assessment

<http://www.cornwall.gov.uk/media/3635959/Cornwall-HRA-March-2013.pdf>

The consultation was publicised and representations were invited in the following ways:

- All specific & general consultation bodies and over 1,000 contacts in our database were notified
- Advertisement in the Cornishman, Cornish Guardian, West Briton, Cornish Times and Cornwall and Devon Post in the week commencing 11th March 2013
- Press release 11th March 2013
- Website and electronic communications: all documents available to view and comment on dedicated webpage with link from front page of the Council's website and links to documents and reports in the evidence base.
- Copies of the documents were available in all libraries, Council Offices and One-Stop-Shops and posters were used to highlight the consultation in these venues
- The consultation was publicised in Team Talk, which reaches approximately 10,000 members of staff and emailed to all officers with a Cornwall Council online account - approximately 2,500 people
- The members of the Infrastructure Provider's Group were notified by email

Statement of procedure for making representations:

<http://www.cornwall.gov.uk/media/3623295/Representations-procedure-statement-FINAL.pdf>

ii) Summary of the main issues raised

We received 710 representations from individuals, organisations and specific and general consultation bodies comprising over 3,000 comments on different elements of the Plan.

Housing:

Over a quarter of comments related to housing (359 of them specific to the target). The discussions over the housing numbers basically fell into 2 divisions: some residents, action groups and some Parish Councils wishing to see lower levels of growth, and house builders, landowners and affordable housing providers who argued that the housing numbers were unrealistically low, particularly if affordable and other housing needs were to be met. There was concern that the affordable housing target was aspiration and not viable and could compromise the CIL.

The majority of comments about housing distribution expressed fear and uncertainty about housing was to be delivered and suggested that sites should be allocated.

Other matters receiving a significant number of comments (around 5% each) were the spatial strategy, employment, environment, renewable energy, infrastructure and legal/procedural matters.

Spatial Strategy:

There was a general consensus that although the plan suggests that it takes a hierarchical approach to distribution of development, with a strategy that accommodates development according to the role and function of places, the actual distribution does not reflect this. The provision for Truro is at odds with its

strategic role and the spatial strategy of providing development in proportional manner, and the figures for St Austell, do not reflect the ambition of directing large scale development at strategic towns. This is inconsistent with the St Austell, St

Blazey and China Clay Area Regeneration plan. There was objection to the lack of emphasis on Penzance, which is not mentioned in the list of main towns.

Employment:

The aim to support economic growth was generally supported, but the target of 50,000 was criticised as being aspirational.

Environment:

Concerns were raised by Natural England about the ability of the plan to protect the AONB and to prevent significant adverse effects on biodiversity. English Heritage were concerned that the Historic Environment policy did not provide a comprehensive framework for the preservation of the historic environment in Cornwall. Many other comments objected to the wording of the policy which required development to 'conserve and enhance' the historic environment, rather than to conserve *or* enhance, as set out in national guidance.

Renewable energy:

Key issues included concerns on the impact on landscapes and especially the AONB from renewable energy installations, particularly wind turbines. Many comments felt that there should be a target for renewable energy. Others were concerned about cumulative impacts and noise. It was also felt that a minimum distance between turbines and dwellings should be specified.

Infrastructure:

Concerns about provision of infrastructure, both in terms of funding and the timely provision of infrastructure were raised in relation to many topics, but especially housing, transport and water and flooding infrastructure. Green infrastructure (GI) was also recognised as important and the GI approach was supported.

Legal/procedural matters:

General concerns that were frequently voiced were that the plan as not sound, as the housing target was too low to meet objectively assessed need. Procedural issues raised were that there was a lack of public engagement and that the consultation should not have taken place in the run up to Council Elections. Plymouth City Council felt the plan did not take account of the influence of Plymouth and questioned therefore whether the Duty to cooperate had been met, despite the joint work between the councils.

All representations can be viewed in full at:

<http://www.cornwall.gov.uk/default.aspx?page=33983>

An overview of the responses to consultation were reported to Environment, Heritage and Planning Portfolio Advisory Committee On 12th September 2013 and the report can be viewed here: <https://democracy.cornwall.gov.uk/documents/s61914/Overview%20of%20responses%20to%20consultation%20-%20Report.pdf>

There are two appendices to the report, which provide a more detailed summary of the issues. Appendix 1 looks at the general policies <https://democracy.cornwall.gov.uk/documents/s61897/Overview%20of%20responses%20to%20consultation%20-%20Appendix%201.pdf>

and Appendix 2 covers the response on the Community Network Areas. <https://democracy.cornwall.gov.uk/documents/s61898/Overview%20of%20responses%20to%20consultation%20-%20Appendix%202.pdf>

There is a third appendix which deals with responses to the Community Infrastructure Levy Preliminary Draft Charging Schedule which is not relevant to this Statement.

iii) How the main issues were addressed

Following the council elections in April 2013 a new Environment, Heritage and Planning Portfolio Advisory Committee (PAC) was established to guide policy development and make recommendations to Cabinet and Full Council.

The Local Plan was discussed at PAC in a series of formal and informal meetings:

The 12th September 2013 PAC received an overview of the responses to consultation on the Local Plan.

The 15th October 2013 PAC Considered the Submission draft Local plan and discussed Housing Targets in detail.

The 15th November 2013 PAC considered a revised Pre-submission Draft and discussed changes to housing distribution.

The agendas and minutes can be viewed here: <https://democracy.cornwall.gov.uk/ieListMeetings.aspx?CIId=933&Year=2014>

The main change to the Local Plan was to revise the housing target from 42,250 to 47,500 for the plan period. The proposed distribution has also been slightly altered, through discussion and agreement of PAC members.

Penzance has been added as a strategic town and the economic role of St Austell has been emphasised (Policy 2);

A landscape strategy statement has been added to the Spatial Strategy (Policy 2) to provide a fuller framework for the special character of all of Cornwall's landscape, including Areas of Great Landscape Value and Areas of Great Historic Value.

The supporting text has been amended to better reflect how the Plan responds to cross boundary issues and economic growth in South East Cornwall in particular.

The text and policy relating to the economy (Policy 2) has been amended to be more closely aligned with the Economic Strategy of the Council and the Local Enterprise Partnership, including the removal of reference to a job target.

More clarity is given on a Cornwall-wide approach to 5 year land supply with local area targets once established through policy.

The text has been amended to remove reference to the need for a separate DPD on waste as it is considered landfill provision is sufficient to last until the latter years of the Plan period.

The policy framework for Community Network Areas has been edited for consistency, focusing on the areas' local objectives.

The Gypsy, Travellers and Travelling Showpeople Policy (12) have been updated to reflect recently updated assessments.

The Plan now also gives clear reference and intent to prepare additional Development Plan Documents (with full weight of legislation) covering;

- site and land allocations;
- minerals safeguarding, and
- travelling communities

and Supplementary Planning Guidance on;

- design;
- building standards;
- affordable housing;
- assessing impact of renewable energy schemes;
- Landscape Impact Assessment incorporating methodologies

The Cabinet report and minutes from the meeting of 27th November, where these proposed changes were discussed can be viewed here:

<https://democracy.cornwall.gov.uk/ieListDocuments.aspx?CIId=577&MIId=5031&Ver=4>

The changes were reported to Full Council on 14th January 2014. Most changes were agreed although Policy 10 was reinstated and not removed as recommended. The intension at this stage was to consult on just the proposed changes however the Council resolution agreed on further consultation on the whole proposed Submission Document (incorporating those agreed changes) and the report and minutes can be viewed here:

<https://democracy.cornwall.gov.uk/ieListDocuments.aspx?CIId=584&MIId=5149&Ver=4>

7. Cornwall Local Plan: Strategic Policies 2010-2030 Proposed submission document March 2014– Notification under Regulation 19

i) How representations were invited

We undertook consultation on the Cornwall Local Plan: Strategic Policies 2010-2030 Proposed submission document from 17th March – 28th April 2014.

This can be viewed by visiting:

<http://www.cornwall.gov.uk/media/6532228/Local-Plan-Proposed-Submission.pdf>

The consultation was accompanied by the Pre-submission Sustainability Appraisal and Habitats Regulations Assessment.

These can be viewed by visiting:

Pre-submission Sustainability Appraisal

<http://www.cornwall.gov.uk/media/3623321/Sustainability-Appraisal-Jan-2013.pdf>

Addendum to Sustainability Appraisal Update to Submission Draft
Report January 2013

<http://www.cornwall.gov.uk/media/3633086/SA-Addendum-Jan-2013-Final.pdf>

Addendum to Sustainability Appraisal Update to Local Plan Pre –
Submission Consultation Version February 2013

<http://www.cornwall.gov.uk/media/3623322/SA-Addendum-March-2013-final-for-consultation- 2 .pdf>

Addendum to Sustainability Appraisal (B) Proposed Submission Document
Report – Post Consultation and with Revised Housing Number and Distribution
(47,500) March 2014

<http://www.cornwall.gov.uk/media/6162117/Updated-SA-Addendum-March-2014- 47500 -with-Planning-Responses- 2 .pdf>

Habitats Regulations Assessment

<http://www.cornwall.gov.uk/media/3635959/Cornwall-HRA-March-2013.pdf>

The consultation was publicised and representations were invited in the following ways:

- All specific and general consultation bodies and over 1,000 contacts in our database were notified
- Advertisement in the Cornishman, Cornish Guardian, West Briton, Cornish Times and Cornwall and Devon Post in the week commencing 24th March 2014
- Press release 11th March 2014

- Website and electronic communications: all documents available to view and comment on dedicated webpage with link from front page and links to documents and reports in the evidence base.
- Copies of the documents were available in all libraries, Council Offices and One-Stop-Shops and posters were used to highlight the consultation in these venues.
- The consultation was publicised in Team Talk, which reaches approximately 10,000 members of staff and emailed to all officers with a Cornwall Council online account - approximately 2,500 people
- The members of the Infrastructure Provider's Group were notified by email

Statement of procedure for making representations:

<http://www.cornwall.gov.uk/media/6162118/Notice-of-Publication-V3.pdf>

ii) Summary of the main issues raised

We received 241 representations from individuals, organisations and specific and general consultation bodies comprising over 2,000 comments on different elements of the Plan.

Housing:

This received the highest number of comments from the consultation with the common themes being;

1. The local plan's forecasts are based upon rolling forward recent lower rates of growth which do not allow for expected increases in economic prosperity.
2. That an expectation from economic growth, when expressed as a jobs figure, requires high levels of population growth.
3. The slowdown in the rate of household formation over recent years has been due to the impact of the recession in the economic cycle and the lack of affordable of housing.
4. The plan does not adequately seek to respond to market signals and pressures such as the level of affordable housing required and could restrict future economic growth through a lack of housing to meet future job growth.

The test will be whether the Plan has been a positively prepared plan that seeks to meet the full objectively assessed need for market and affordable housing. A number of representations to the consultation argue that the Plan fails this with regard to a number of key components of the objective assessment of need;

- Economic growth; some objectors call for significant uplift in population and associated housing numbers to support economic growth.
- Market indicators; the NPPF and National Planning Practice

Guidance require us to consider factors including land and affordability and increase in house prices. These are seen as a symptom of a stressed housing market and guidance recommends consideration of responding to these issues in looking at levels of growth. In addition objectors have raised the concern that the proposed rate of growth will not address the need for affordable housing or the impact of second homes upon the local market. Objectors argue that we have not taken sufficient account of these. Others suggest we should not.

Demographic change is also a key factor and broadly accepted as a start point among those seeking higher target, but are rejected by those seeking lower. Other objectors argue that the most recent projections reflect an underestimate of likely need as they respond to downturns caused by the recent recession and lack of affordable homes.

- Objections proposing a lower target argue that the ONS based projections which are the basis of our objectively assessed need, and recognised as national standards, are not appropriate to Cornwall and are consistently inaccurate. These issues relate primarily to the degree to which previous ONS projections have been perceived to overestimate future levels of housing and population growth. On that basis the robustness of relying upon this data source is questioned.
- In addition concerns are raised around the sustainability of the levels of growth in terms of its impacts upon the local environment and the need to protect critical environmental capital such as agricultural land.
- Boosting housing supply as advocated by NPPF; objections argue that the Plan does not do this. National policy requires plans to show a step change in the delivery of housing. Many local plan examinations have considered this issue and looked at how the proposed rate of growth relates to not just existing trends but prerecession or longer term build rates.

The full range of suggested housing targets from 44 representations on housing numbers is; 29,000 (x2), 38,000, 57,500, 64,000 (x5), 60-65,000, 72,000 (x5) and 74,500 (x2).

Other than Housing Numbers the major focus of representations is on;

- Affordable housing targets that are largely argued to be too high and failing to take sufficient account of viability. However, some continue to argue that they are too low and will fail to meet need. The proposed policy approach to publicly owned land (Policy 10) received objections on the basis that it inhibited public bodies from securing 'best value' for their assets with adverse impact on their ability to deliver the best services;
- A prevalent view, but not associated with one policy in particular, is a greater need for clarity on the acceptable location of development and this also relates to allocations of land around the main towns and the Plan's approach to infill and settlement boundaries for smaller settlements.

- Comments on design and more generally on the environment were largely supportive of the policies' intents although a number of agencies sought further detail. There was concern about the additional and inappropriate burden of higher quality and standards on delivery of development. In particular, issues of historic environment and landscape especially in the AONB were raised against several policies as well as the impact of renewable energy proposals on the landscape.
- Particular concern is raised about the impact on the Area of Outstanding Natural Beauty (AONB), and its setting, of the Council's dispersed approach to development. This is based in the lack of detail in the plan regarding the exact location of development and not showing evidence that this can be provided in the rural areas without harm to the AONB.
- The burden of new development on infrastructure that is perceived to be inadequate and the ability to deliver the necessary infrastructure.
- Minerals and waste policies received few representations.
- Several comments assert that the Plan is in breach of the Framework Charter for the Protection of National Minorities particularly the Cornish. Comments on Community Network Areas were specific to those areas but mainly focussed on similar issues to the main body of strategic policies as outlined above.

All representations can be viewed in full at:

<http://www.cornwall.gov.uk/environment-and-planning/planning/planning-policy/adopted-plans/cornwall-local-plan-strategic-policies/strategic-policies-proposed-submission-version/responses-to-proposed-submission-version/>

An overview of the responses to consultation were reported to Environment, Heritage and Planning Portfolio Advisory Committee

On 24th July 2014 and the report can be viewed here:

<https://democracy.cornwall.gov.uk/documents/s70750/Cornwall%20Local%20Plan%20proposed%20submission%20draft.pdf>

A more detailed summary of the issues which supported the report can be viewed here:

<https://democracy.cornwall.gov.uk/documents/s70751/Cornwall%20Local%20Plan%20proposed%20submissions%20draft%20Appendix%201.pdf>

A detailed response to all the issues raised was reported to Environment, Heritage and Planning Portfolio Advisory Committee on November 2014.

Appendix 3a covers the General Policies and can be viewed here:

<https://democracy.cornwall.gov.uk/documents/s73991/Cornwall%20Local%20Plan%20Strategic%20Policies%20Proposed%20Submission%20Draft%20Appendix%203a.pdf>

Appendix 3b covers the Community Network Areas and can be viewed here:

<https://democracy.cornwall.gov.uk/documents/s73992/Cornwall%20Local%20Plan%20Strategic%20Policies%20Proposed%20Submission%20Draft%20-%20Appendix%203b.pdf>

iii) How the main issues were addressed

Government Policy and guidance is set out in the National Planning Policy Framework (NPPF) and National Planning Practice Guidance. This sets out the need for a plan led system with positively prepared plans which address the full objectively assessed needs of their areas. Nationally the NPPF is also clear there should be a significant increase in housing supply and Plans should plan positively for economic growth.

The report taken to PAC on the 24th July 2014 set out the main elements of this Council's proposed responses to the consultation, and confirms the key elements of the overall strategy and case of the published draft plan as the basis for submission to the SOS.

The spatial strategy outlined in the draft Plan supports an approach that all communities need some growth to meet their needs but with a focus of larger scale growth in the main towns where the infrastructure is focused. This is intended to meet housing need; sustain communities; and support economic growth through improved performance/productivity.

The report sets out why it is believed that the published draft plan, with amendments, addresses the concerns raised. However further work to address some concerns including policy wording changes and ensuring evidence is updated is required. This will be reported to Cabinet. The report also sets out to undertake an additional consultation on an additional policy, in advance of the Council's consideration of the local plan, to strengthen more explicitly the approach to the protection of the Countryside for its own sake.

In response to the issues raised the report proposes that:

- The previously agreed housing target meets need arising from demographic change as the objectively assessed need in Cornwall. Evidence from the Office of National Statistics (ONS) and the Strategic Housing Market Needs Assessment (SHMNA) provides the best available basis for forecasting future growth.
- The approach to the level of growth in the current local plan is consistent with Local Enterprise Partnership's (LEP) strategy which focuses on enabling skills, cross sector collaboration and specialisation focussed on Cornwall's assets as drivers of increasing productivity and quality rather than a dependence upon inward migration and accelerated population growth above that accounted for in ONS based projections.
- Whilst the NPPF seeks a step change in housing delivery, housing delivery in Cornwall has been at an equivalently high rate relative to its population. The proposed level of growth still reflects the prerecession growth levels in Cornwall and provides an increase over longer term build rates.

- The spatial strategy reflects a sustainable approach to Cornwall's settlement pattern and communities. It balances social and economic need with the protection and enhancement of the environment and landscape. In addition the local plan and strategy complements the existing strategies of neighbouring authorities to meet their needs.

In addition PAC resolved that the Council consult on a schedule of focused changes which would include a new policy or one based on an amended 'saved policy' could seek to protect the Countryside for its own sake and ensure a plan led approach to major development through allocations. The Allocations document and Neighbourhood Plans that will follow this strategic policy's element will clearly need to identify green field sites as well as supporting previously developed land. Those sites will need to be tested in terms of delivery and viability to ensure they can come forward in the context of a five year land supply.

A draft amendment is Appendix 2 to this report on this issue can be viewed here:

<https://democracy.cornwall.gov.uk/documents/s70752/Cornwall%20Local%20Plan%20proposed%20submissions%20draft%20Appendix%202.pdf>

The purpose of an additional policy for the protection of the countryside, therefore, is not to prevent planned growth but highlight that once these documents and allocations are in place and have been tested, loss of further greenfield development beyond that allocated, would be resisted. This requires an additional period of consultation to seek views on the policy. This consultation could be undertaken with the formal approval of the Portfolio Holder and the response reported back to Cabinet for consideration prior to submission to Council when considering the Plan as a whole.

In addition, a number of issues should be constructively addressed through amendment to the supporting text of the Plan;

- Include a clear statement of intent of the impact of the Plan's policies on the Cornish ethnic minority that they intend to plan for future communities in Cornwall and not actively increase the population in itself. Consequently housing policies seek to ensure the needs of ethnic Cornish are met as part of the wider market.
- Include a clear statement that the Plan's housing target is closely related to the economic strategy of the LEP, supported by the Council. Specifically this is about ensuring the right homes in the right places to help support skills mobility and access to employment.
- Redraft CNA sections to allow town centre boundaries to be defined in the Allocation DPD and enable a refresh and review in collaboration with Town Centre Managers and CNA.
- Amend the wording of supporting text on renewable energy to ensure it reflects, clearly, the aims of the overall landscape strategy and mentions the fact

that landscape impact for such development is considered both temporary and reversible.

- Amendments to accommodate duty to co-operate partners' concerns. Discussions with key duty to co-operate partners are ongoing with a view to resolving any outstanding concerns prior to submission. It is recommended that the Head of Planning, Housing and Regeneration in consultation with the Portfolio Holder exercise his delegated authority to make consequential 'non-significant' changes to the plan.

In advance of Cabinet and Council's consideration of the Plan we need to update and simplify where appropriate the evidence base, particularly the SHMNA to provide an early assessment of the implications of emerging demographic projections and scrutiny of other relevant economic projections. In addition an update of the Sustainability Appraisal is being prepared to better understand the implications of both higher and lower levels of growth proposed in some of the representations. The sustainability appraisal and impact assessment of the plan will also assess the implications for the local plan, if any, of the designation of the Cornish in terms of minority status.

Further work will therefore be presented to Cabinet on these issues subject to the views of the PAC.

8. Cornwall Local Plan: Strategic Policies 2010-2030 Schedule of Focused Changes September 2014

i) How representations were invited

We undertook consultation on the Cornwall Local Plan: Strategic Policies 2010-2030 Schedule of Focused Changes from 4th September - 16th October 2014.

This can be viewed by visiting:

<http://www.cornwall.gov.uk/media/8086760/Final-LP-Schedule-of-Changes-August-2014-smaller.pdf>

The consultation was accompanied by addendums to the Sustainability Appraisal and Habitats Regulations Assessment.

These can be viewed by visiting:

Addendum to Sustainability Appraisal to accompany proposed changes (Sept 2014) to the Cornwall Local Plan Strategic Policies – Proposed

Submission Document (March 2014) – August 2014:

<http://www.cornwall.gov.uk/media/7869821/SA-Addendum-August-2014.pdf>

Habitats Regulations Assessment

<http://www.cornwall.gov.uk/media/7804678/Cornwall-HRA-May-2014.pdf>

The consultation was publicised and representations were invited in the following ways:

- All statutory consultees and over 1,000 contacts in our database were notified.
- Advertisement in the Cornishman, Cornish Guardian, West Briton, Cornish Times and Cornwall and Devon Post in the week commencing 8th September 2014
- Press release September 2014
- Website and electronic communications: all documents available to view and comment on dedicated webpage with link from front page and links to documents and reports in the evidence base.
- Copies of the documents were available in all libraries, Council Offices and One-Stop-Shops and posters were used to highlight the consultation in these venues.
- The members of the Infrastructure Provider's Group were notified by email

Statement of procedure for making representations:

<http://www.cornwall.gov.uk/media/8086338/Statement-of-Representations-Procedure.doc>

ii) Summary of the main issues raised

We received 84 representations from individuals, organisations and specific and general consultation bodies comprising over 231 comments on different elements of the Plan.

Representations sought during the Proposed Schedule of Focused Changes consultation were restricted just to the proposed changes. Many of these were changes to the supporting text and made no change to policy. Representations received were largely about intended meaning of wording. More substantive representations were made on changes to policy wording.

- Amendment to a maximum of 50% land take for market housing on Affordable Housing led schemes (Policy 9) received objections on the grounds it is not flexible enough for effective delivery and risks the viability of delivering the affordable housing.
- Reduction of the Gypsy and Traveller residential pitch requirement in Policy 12 received objection on grounds of the revised evidence used.
- The new 'Protection of the Countryside' policy (22a) received objections, from pro-development interests mainly on the grounds that it duplicates policy elsewhere and is contrary to NPPF. More broadly the 'and/or' approach to criteria raised objection as too restrictive or too permissive.

All representations can be viewed in full at:

<http://www.cornwall.gov.uk/environment-and-planning/planning/planning-policy/adopted-plans/cornwall-local-plan-strategic-policies/schedule-of-focused-changes/responses-to-focused-changes-consultation/>

The responses to consultation were reported to Environment, Heritage and Planning Portfolio Advisory Committee on 14 November 2014 and Cabinet on 19th November 2014 and the report can be viewed here:

<https://democracy.cornwall.gov.uk/documents/s73988/Cornwall%20Local%20Plan%20Strategic%20Policies%20Proposed%20Submission%20Draft.pdf>

Appendix 1 Cornwall Local Plan – Strategic Policies, Pre Submission Document – March 2014 can be viewed here:

<https://democracy.cornwall.gov.uk/documents/s73989/Cornwall%20Local%20Plan%20Strategic%20Policies%20Proposed%20Submission%20Draft%20-%20Appendix%201.pdf>

Appendix 2 Cornwall Local Plan – Strategic Policies, Pre Submission Document – March 2014 can be viewed here:

<https://democracy.cornwall.gov.uk/documents/g5097/Public%20reports%20package%2015th-Nov-2013%2010.00%20Environment%20Heritage%20and%20Planning%20Portfolio%20Advisory%20Comm.pdf?T=10>

Appendix 3a Cornwall Local Plan – Strategic Policies, Pre Proposed Submission Document –March 2014 Consultation Responses on general policies can be viewed here:

<https://democracy.cornwall.gov.uk/documents/s73991/Cornwall%20Local%20Plan%20Strategic%20Policies%20Proposed%20Submission%20Draft%20Appendix%203a.pdf>

Appendix 3b Cornwall Local Plan – Strategic Policies, Pre Proposed Submission Document –March 2014 Consultation Responses on Community Network Areas can be viewed here:

<https://democracy.cornwall.gov.uk/documents/s73992/Cornwall%20Local%20Plan%20Strategic%20Policies%20Proposed%20Submission%20Draft%20-%20Appendix%203b.pdf>

Appendix 4 Responses to proposed Schedule of Focused Changes to the Cornwall Local Plan Strategic Policies Proposed Submission Document – 2010-2030 (March 2014) can be viewed here:

<https://democracy.cornwall.gov.uk/documents/s73993/Cornwall%20Local%20Plan%20Strategic%20Policies%20Proposed%20Submission%20Draft%20-%20Appendix%204.pdf>

iii) How the main issues were addressed

The Council reported to PAC and Cabinet on the 14th and 16th November its response to the representations on the Proposed Schedule of Focused Changes which were:

- Amendments to policy 9 seeks to equalise the land take and proportion of market housing in affordable housing led schemes.
- The revised evidence base for the Gypsy and Traveller policy is the most up-to-date available as a basis for these targets.
- The new policy for protecting the countryside is in line with NPPF's intention for a plan led system as well as its assertion that the countryside should be protected for its own sake.

Both PAC and Cabinet recommended to Full Council that it formally resolve to submit the Cornwall Local Plan, comprising the published Plan, being the Cornwall Local Plan Strategic Policies Submission Document 2010-2030 – March 2014 and the ' Proposed Schedule of Focused Changes' as set out in Appendices 1 and 2 respectively to the Secretary of State for Examination. The Council should make this decision having regard to;

- the responses to the consultation on each of these documents as summarised in Appendices 3a and 3b and 4 respectively and the full representations available to view on the Council's web pages, and
- Other supporting documentation which includes the Sustainability Appraisal Final Report and Habitat Regulations Assessment which can be viewed on the Local Plan web pages:

<http://www.cornwall.gov.uk/environment-and-planning/planning/planning-policy/adopted-plans/sustainability-appraisal-and-habitat-regulation-assessment/>

At the Full Council meeting held on 16th December 2014 Members resolved that

1. The Cornwall Local Plan, consisting of the Cornwall Local Plan: Strategic Policies Proposed Submission Document 2010-2030 (March 2014) and the Proposed Schedule of Focused Changes (Appendices 1 and 2 respectively) and associated supporting documentation, as set out in the report, be submitted to the Secretary of State for examination, subject to the inclusion of an updated table showing housing targets (including completions and commitments) in the Community Network Areas.
2. The Council commits itself to a continued review of evidence, and after the adoption of the proposed Local Plan, considers an early partial or total review of the Plan, where required by evidence (including future projections) and changing circumstances.

9. Cornwall Local Plan: Strategic Policies 2010-2030 Local Plan Examination May 2015

i) Update on Examination

The Council submitted a draft Plan to the Secretary of State in February 2015 (Submission Document (March 2014) and Schedule of Focused Changes (September 2014)) (the submitted Plan). The Examination started in May 2015.

However, the Inspector's Preliminary Findings raised some key concerns about the Local Plan's soundness. Consequently the Council asked for the Examination to be suspended whilst the Council did more work to address the issues highlighted by the Inspector. Following the Council's consideration and publishing of the proposed changes the Examination will recommence.

The key changes proposed are:

- Increase the overall housing requirement to 52,500 following a reassessment of the Full Objectively Assessed Need for Cornwall.
- Distribution of this new target to meet need across Cornwall
- Provide additional clarity for assessing Parish based targets within network areas.
- Set out a clearer alignment between the Local Plan and Economic Strategies and revise employment land targets to reflect this.
- Revise affordable housing percentages, by zone, to reflect the viability evidence.
- Incorporate revised targets for provision to meet the needs of Gypsy and Travelling communities
- Provide additional detail on European Special Areas of Conservation to ensure Habitat Regulations are met.
- Deletion of the Community Network Area (CNA) section policy wording and incorporate policy intentions for these in the main policies.