Cornwall Local Plan Examination

National Trust Summary Position Statement

Issue 7 – Policies for the Historic and Natural Environment (Policies 23a 23 24) and related changes

**Question 7.1** Comments on changes set out in L1.CC.2.1

**Question 7.2** As now proposed by the Council, does the plan provide appropriate policies for the natural environment in accordance with national policy and local circumstances and evidence?

In L1.ID.2 the Inspector invited the Council to respond to two particular points raised by the National Trust, one was on seascape and the other on the “undeveloped coast”.

1. **Seascape**

The added reference to ‘seascape’ in the supporting text to Policy 23 (L1.CC.2.1) is welcome. However, the proposed text in saying that “Cornwall does not currently have a Seascape Character Assessment” could be more helpful in signposting the forthcoming strategic seascape assessment for the South West Inshore Marine Plan area due to be published by the MMO this summer/autumn.

The MMO are also working closely with local authorities to support the production of local seascape assessments, such as the joint seascape character assessment recently prepared for North Devon Council, Torridge District Council, Exmoor National Park Authority and the North Devon Coast AONB, in partnership with the National Trust and Natural England (Land Use Consultants; November 2015).

On the basis of the above local seascape assessment the Trust suggest a revised wording to the Local Plan text on page 86 of L1.CC.2.1 as follows:

*Seascape character assessments (SCA) often extend to the landward extent of the terrestrial coastal zone so that there is an overlap with landscape character assessments (LCA); where this is the case the two resources should be used together to provide a fully integrated resource on landscape and seascape character.*

Policy 23 on Cornish Landscapes should also refer to the use of: *seascape character assessment when available*

Whilst the draft Cornwall AONB Management Plan (2016-2021) identifies the securing of resources for a Seascape Assessment for Cornwall as a key priority in its Delivery Plan for the next five years, with Cornwall Council acting as the lead partner, it is noted that the Local Plan remains silent on any commitment to a local seascape assessment.
2. **The undeveloped coast**

The Trust owns over a third of the coast in Cornwall, where there are large stretches of undeveloped coast not covered by national landscape designations (WHS and AONB), nor nationally defined as Heritage Coast.

The Trust welcomes the definition to ‘undeveloped coast’ now provided in the supporting text to the local plan. However, the Trust still questions whether it will be sufficiently clear where the presumption against development applies, particularly given that the local plan is not to identify the boundaries of rural settlements. Using the case example given in the Trust’s representation of SHLAA site S223 at Crantock (location plan appended to this statement), the Trust asks the Council if, in applying its new definition, it accepts that this site falls within the ‘undeveloped coast’, and if not why not?

The Trust would like the Council to clarify if the presumption against development will apply adjacent to settlements in the undeveloped coast, given that proposed changes to national planning policy (DCLG; Dec 2015) intend to make clear that proposals for development on small sites immediately adjacent to settlement boundaries should be supported if they are sustainable (para 24; p.12), which would in effect create a presumption in favour of sustainable development.

Subject to discussion at the hearing should the Inspector conclude that some form of designation of the ‘undeveloped coast’ on the Proposals Map is required to make the policy effective, thereby bringing it into line with most of the coastal authorities in Devon, then the Trust would support the Strategic Policies DPD indicating this as a task to be completed through a subsequent DPD, such as the Site Allocations Plan.

Policy 23 should make clear that any development demonstrably requiring a coastal location, and that cannot be achieved outside the undeveloped coast, must still not detract from the undeveloped character of that coast, in line with national policy (NPPF; para 114) and objective 1[d] of the local plan (Policy 2). Suggested additional text to policy 23 (underlined):

*In areas of undeveloped coast, outside main towns, only development requiring a coastal location, and that cannot be achieved elsewhere will be acceptable. All such development must maintain the character of the undeveloped coast, conserving and enhancing the distinctive coastal landscape and the special qualities of the seascape.*

**Inspector’s Questions on Policy 26 Flood risk management and coastal change (L1.ID.6):**

The use of Coastal Change Management Areas would help ensure the Shoreline Management Plan was implemented through the development plan, and give a clear steer as to what development is acceptable and where, given the rates of shoreline change anticipated in some locations. [See Appendix 2 for NT position on coastal adaptation and CCMAs: pages 7, 12 and 16]

To be effective the Strategic Policies document needs to be clear what is expected to be done in relation to identifying CCMAs and in what part of the local plan.

**Appendices to NT Statement on Natural Environment Policies:**

1. Map of SHLAA site S223 at Crantock in relation to coast and NT land.
2. Shifting Shores (NT policy position)

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