

# **Cornwall Local Plan: Strategic Policies Statement of Representations**

March 2013

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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 Pre- submission stage. The summaries of representations are brief, but links to the full schedules of representations and to Response Reports to Cabinet are included in the document.

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

Document	Consultation dates
Topic Papers and Place Based Papers	27 <sup>th</sup> July – 28 <sup>th</sup> August 2009
Core Strategy Options	7 <sup>th</sup> February – 28 <sup>th</sup> April 2011
Core Strategy Preferred Approach Options and Preferred Options for Minerals, Waste and Energy	9 <sup>th</sup> January – 2 <sup>nd</sup> March 2012
Local Plan: Strategic Policies Pre-Submission Document	Commencing 11 <sup>th</sup> March – 22 <sup>nd</sup> April 2013

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 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

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

Comments received during the consultation were used to identify relevant strategies and policy context and elicit the main spatial planning issues determine the scope of the plan. Issues papers are updated at intervals to reflect changes to the evidence base.

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. Core Strategy Options**

#### **i) How representations were invited**

We undertook a public consultation on the Core Strategy Options Paper from 7<sup>th</sup> February – 28<sup>th</sup> 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. We also consulted on a Sustainability Appraisal Interim Report.

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

- All statutory consultees and over 1000 contacts on our database were notified
- Presentations to all 19 Community Network Area meetings
- 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 libraries (32) and one stop shops (22)
- 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

Other engagement:

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 24<sup>th</sup> June 2011:

<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 Planning Policy Advisory Panel and wider Council members, where the responses to consultation 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: <http://www.cornwall.gov.uk/default.aspx?page=32791>

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

### **i) How representations were invited**

Consultation ran between 9<sup>th</sup> January and 2<sup>nd</sup> 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?

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

- All statutory consultees and over 1000 contacts on our database were notified
- Formal press notifications in the Cornishman, Cornish Guardian, West Briton, Cornish Times and Cornwall and Devon Post (4<sup>th</sup>/5<sup>th</sup> January 2012)
- Press release 3<sup>rd</sup> 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 Prate 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.

#### Other engagement

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
- Probus Parish Council
- Veryan Parish Council
- St Blazey and Clay Country CNA meeting
- Cornwall Rail Forum
- Bodmin Town Council
- Mining Parishes CNA meeting
- Deviock, Duloe and Lanreath, Morval and Pelynt (5 parishes) meeting
- Trelawney Alliance
- Two focus groups facilitated by PAS
- Fal Energy Partnership
- Highways Agency
- Environment Agency
- Feock Parish Council
- Cornwall Business Partnership
- Sheviock Parish Council
- Natural England
- Cornwall Design Panel
- Bodmin Community Network Area meeting
- English Heritage

## **ii) Summary of main issues raised**

### Strategic Policies

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 responses 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 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 housebuilders 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 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 now separate and have been 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 have been added.

A revised growth target is proposed in Bodmin, with the support of the Town Council. A lower figure is proposed for Saltash and a target identified for Torpoint. The concept of a stand alone Eco settlement has 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 has been developed with renewable energy development being assessed against all policies in the Local Plan. A safeguarding policy is proposed as well as policy encouraging and recognising the importance of community energy schemes.

For minerals a supportive approach is 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 28<sup>th</sup> September 2012 and the report is item 5 on this agenda:  
<https://democracy.cornwall.gov.uk/ieListDocuments.aspx?CIId=663&MIId=4321&Ver=4>