

St Just-in-Penwith Neighbourhood Development Plan

Consultation Statement

November 2020

Produced by the St Just Neighbourhood Development Plan Steering Group

1 December 2020

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Introduction

The Consultation Statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012 under Section 5(2). A Consultation Statement:

- (a) contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
- (b) explains how they were consulted;
- (c) summarises the main issues and concerns raised by the persons consulted; and
- (d) describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.

This Consultation Statement summarises all the statutory and non-statutory consultation that has been undertaken with the community and other relevant statutory bodies and stakeholders in developing the St Just-in-Penwith Neighbourhood Development Plan. It describes how concerns have been addressed and what changes have been made to the final Plan as a result of the pre-submission consultation.

Aims of the Consultation

In the Community Engagement Strategy produced at the beginning of the Neighbourhood Plan process, we stated that our objectives were:

- 1) to engage as many of the community as possible
- 2) to generate information and ascertain public views to inform and guide the Neighbourhood Development Plan
- 3) to engage sufficient people to secure a representative vote in the final referendum
- 4) to lead to sufficient agreement about the Neighbourhood Plan to generate a 'YES' vote in a referendum
- 5) to create a body of evidence about engagement that will satisfy the independent examination

Our revised Community Engagement Strategy is here: <https://www.stjustandpendeen-np.org.uk/stjnp/wp-content/uploads/2020/11/St-Just-NDP-Community-Engagement-Strategy-revised-August-2020-v2.pdf>

Information on Consultation on the Neighbourhood Development Plan

1. Initial public meetings were organized by St Just Town Council on 8 November 2017 and 17 January 2018, with support from Cornwall Council. Report of these meetings are at <https://www.stjustandpendeen-np.org.uk/stjnp/wp-content/uploads/2020/04/St-JUST-NP-Public-Mtg-Nov-17-JH-Final.pdf>
<https://www.stjustandpendeen-np.org.uk/stjnp/wp-content/uploads/2020/11/NP-meeting-Pendeen-notes-17.01.18-003-1.pdf>

2. Phase 1: 'Have Your Say'

The aim of this phase was to inform residents about the NDP, provide background information and to elicit public views and priorities without in any way leading them, so as to scope the NDP. In June 2018 two 'Have Your Say' open events were organized, one in St Just and one in Pendeen, each lasting a full day and evening. People were invited to give their views on what is special about the Parish, what could be improved, and what they would like to see in the NDP. Each house in the Parish was leafleted about the events and they were advertised throughout the Parish and through local and social media. During the summer other 'Have Your Say' activities were organized: presentations to school children; a stall at Lafrowda festival; stalls at Rugby Club and Soccer Club community fun days. A total of 454 people participated, with 329 completing the questionnaire. The 'Have Your Say' results were published in November 2018: <https://www.stjustandpendeen-np.org.uk/stjnp/wp-content/uploads/2018/12/Have-Your-Say-2018-Final-Report.pdf>

For the first two sections of the questionnaire the three most popular topics in responses were:

- What do you like about St Just Parish: open spaces, community, heritage?
- What could be improved: facilities; parking; appropriate development?

'What do you want in the plan?' gave a long list of topics with 'appropriate development' in 17% of responses, followed by facilities; conservation; business provision; affordable housing; second homes; parking; green belt; planning enforcement; community; renewable energy; public transport; planning/infrastructure; re-purpose buildings; footpath/cyclepath. (Other items featuring in 2% or less of responses are not listed.)

3. Stakeholder meetings

The Steering Group reviewed list of possible stakeholders and agreed that the vast majority of businesses, farming interests and voluntary organisations would be reached through consultation with residents. It identified larger stakeholders who should be interviewed individually: AONB; WHS; National Trust (also representing Tin Coast Partnership); Penwith Landscape Partnership; Live West (Housing Association); Lands End Peninsula Community Land Trust; Cornwall Community Land Trust; Land's End Airport; Warrens Bakery (now closed); Laurence Associates (representing some landowners); Celtic Turf. These interviews sought to understand the interviewees' own priorities and their advice for the NDP. An agreed note of each interview was published as part of the evidence for the NDP: see <https://www.stjustandpendeen-np.org.uk/reference-library/> (Stakeholder section). Cornwall Wildlife Trust supplied maps and information on the natural environment.

4. Phase 2: 'Defining Development' Household Survey

'Have Your Say' and stakeholder interviews, together with team members' research, were used to identify areas to be covered in the Survey, which was delivered to all homes in the Parish in June 2019. A copy of the survey is here: <https://www.stjustandpendeen-np.org.uk/stjnp/wp->

<content/uploads/2020/11/QUESTIONNAIRE-Final-Edit-V1-.pdf>

Surveys were collected a fortnight later or could be returned to local drop-off points. The survey asked 99 detailed questions on a wide range of planning topics as well as seeking background and demographic information. It also included maps showing the existing settlements, with an invitation to mark areas thought suitable for development. 2665 copies were distributed, with a return of 998 surveys, representing a return rate of 39% based on the number of households in the Parish. The team was trained to input the details onto a spreadsheet so that results could be reliably collated. Results were published in September 2019 at <https://www.stjustandpendeen-np.org.uk/reference-library/>. The reports cover an introduction; 'preliminary data' – analysis of the main questions; analysis of the business section; analysis of the section on community facilities; a report on the interpretation of responses to the maps provided in the survey. The age profile of respondents was very close to that of the Parish.

The survey was therefore based on community priorities and designed to elicit what policies the community wished for with as much specificity as possible. The team considered that the high response rate to this approach gave a clear mandate for policy-drafting. A document is included in the NDP matching the policy responses with the survey questions: <https://www.stjustandpendeen-np.org.uk/stjnp/wp-content/uploads/2019/11/NP-Household-Survey-Map-Interpretation-Report-agreed-28-October-2019-final.pdf>

5. Housing Needs Survey

The Affordable Housing Team at Cornwall Council was commissioned to undertake a Housing Needs Survey, conducted on its standard model in September 2019. This produced a lower return rate of 10% (considered statistically significant). Key issues were the need for affordable housing and the 'affordability): https://www.stjustandpendeen-np.org.uk/stjnp/wp-content/uploads/2019/11/St-Just-HNS-Report-Draft-v1.2-final_appendices.pdf

6. Consultation with specific groups

- May/June 2019: *Landowners* were identified and informed of the mapping exercise which would be included in the Household Survey with an invitation to mark development areas in the survey and invited to comment on any points directly affecting their holding. Two replied offering land for development. (They were later informed of the decision not to proceed with setting development boundaries and raised no objection).
- June 2020: *Landowners* whose holdings could be affected by the draft policy for 'Open Spaces between the settlements' were informed and invited to comment on any points directly affecting their holding. Comments were received from an agent on behalf of 4 landowners, plus his personal comments on some points of detail. A report of these comments and the team's responses is at <https://www.stjustandpendeen-np.org.uk/stjnp/wp-content/uploads/2019/11/St-Just-HNS-Report-Draft-v1.2->

final_appendices.pdf

- August/September 2020: Owners of *community facilities* informed of the Community Spaces policy and invited to comment. **There were no adverse responses.** See <https://www.stjustandpendeen-np.org.uk/stjnp/wp-content/uploads/2020/11/St-Just-NDP-Community-facilities-consultation-Oct-2020.pdf>

7. Ongoing and other activities

- A website was set up, with regular updates: www.stjustandpendeen-np.org.uk
- A Facebook page was set up, to disseminate information and news about activities. Information has also been available on the Town Council website and the Cornwall Councillor's website.
- Regular contributions have been made on the progress of the Plan to the parish 'Outreach' magazine, which is widely available.
- News items have been provided to local media.
- Autumn 2019: stall at 'Sustainable Pendeen' events.

8. Town Council

- Regular reports have been made to the Town Council.
- The draft NDP was presented to the Town Council at a joint meeting on 7 September 2020. The Town Council formally approved the draft Plan on 21 September 2020:
- The Town Council were asked to advise on the merits of a Principal Residence Policy and took the view on 21 September that there was insufficient evidence to support this. The Town Council also advised on priorities for the use of Community Infrastructure Levy. <https://www.stjust.org/stjusttc/wp-content/uploads/2019/04/m.210920FC-001-2.pdf>

Neighbourhood Plan Steering Group

The Steering Group was initially formed at the second public meeting in January 2018. Its terms of reference were set by the Town Council in November 2017, using the recommended model and confirmed on 26 August 2018:

<https://www.stjustandpendeen-np.org.uk/stjnp/wp-content/uploads/2020/11/TC-NP-Working-Party-18.12.17a-1.pdf>

<https://www.stjustandpendeen-np.org.uk/stjnp/wp-content/uploads/2018/08/St-Just-Pendeen-Neighbourhood-Plan-Steering-Group-Terms-of-Reference-1.pdf>

Initially three working groups were formed from those interested at the second public meeting: Natural Environment, Built Environment and Community Engagement. The Environment Groups went through a number of changes in remit and personnel, finally merging, and a composite list of active participants is therefore given below. Community Engagement Group membership also varied

so a composite list is given. All groups initially worked in gathering information and understanding the issues within their remit. Groups met at least monthly and usually more frequently. The Community Engagement group organised the 'Have Your Say' phase, analysed the responses and separated these into topics. These were used by the sub-groups to formulate questions for the household survey. Communications between the working groups and the Steering Group were maintained by representation of the Groups on the Steering Committee; attendance by the Chair and Secretary at all meetings as far as possible; joint meetings if needed. Following the Household Survey in June 2019, it was agreed that separate working groups were not needed and that they should be folded into the Steering Group, with group members opting in if they wished, to ensure that the processes of planning the rest of the work and policy-writing would be coherent. Membership of the Steering Group is therefore given as at October 2019. Lead roles are identified but essentially all aspects of the work were shared. See Appendix 3 for membership of the Steering Group and working groups. For Steering Group agendas and minutes see <https://www.stjustandpendeen-np.org.uk/steering-group/> Sub-group minutes are on <https://www.stjustandpendeen-np.org.uk/built/>

Strategic Environmental Assessment Screening

The St Just-in-Penwith NDP Steering Group requested that Cornwall Council screen the Neighbourhood Plan for Strategic Environmental Assessment and Habitat Regulations Assessment on 1 July 2020.

Natural England, the Environment Agency and Historic England were consulted as part of the screening process. The screening opinion concluded that SEA and HRA are not required for the Neighbourhood Plan. The Screening Decision and the Screening Opinion Report are at: <https://www.stjustandpendeen-np.org.uk/draft-neighbourhood-development-plan-for-st-just-parish/>

Pre-submission Consultation (Regulation 14) Community Engagement

The Pre-Submission consultation on the draft plan proposal was held between 12 October and 23 November. Special arrangements were made to take account of the Covid-19 restrictions. Posters and A boards were displayed throughout the Parish to alert the community to expect an information leaflet about the community consultation. All homes in the Parish received this leaflet in the following week. It explained the consultation and how they could access the Plan and participate electronically, or by requesting a hard copy of the Plan to be delivered to them. The poster and leaflet are here: The poster and leaflet distributed prior to the section 14 consultation: poster <https://www.stjustandpendeen-np.org.uk/> leaflet <https://www.stjustandpendeen-np.org.uk/stjnp/wp-content/uploads/2020/11/St-Just-NDP-s14-consultation-leaflet.pdf>

A dedicated telephone number was set up via which copies could be requested and questions answered. (See the revised Community Engagement Plan for full details of the arrangements.) It should be noted that policy drafting was in progress when the first Covid lockdown started and it was therefore not possible to organise public meetings or workshops on the policies. It was considered that it would not be possible to organise virtual meetings in a way which did not exclude

large numbers from participating. During the consultation period there were regular prompts in the local newspaper.

The following statistics detail the reach of the consultation:

- leaflets were delivered to 2580 dwellings
- during the consultation period the website had hits from 579 unique visitors in the UK
- the Facebook page had 481 followers
- there were 230 downloads of the Plan
- there were 26 meaningful public responses; 8 of these expressed support and 18 provided critique.

Main Issues and Concerns Raised during the Consultation

1. Pre-submission consultation (Regulation 14) formal consultee engagement

The formal consultee responses are set out in Appendix 1. A land agent provided a response containing both personal views and views on behalf of some (unspecified) clients. This was the only response proposing modifications and is dealt with in the 'main issues and concerns' section below and details of the response are in Appendix 2.

2. Main issues and concerns from the community consultation

Housing development

- Limitations on the number of dwellings in new developments (AD1): lower the maximum number of dwellings to 10 (3 respondents); limit of 20 is arbitrary (1).
- Affordable housing: no specific plan for this (1); prioritise for locals / older residents (1)
- Community-led development only part of the mix to meet housing needs (1)
- Principal residence policy should be included (3); is opposed (1)
- Concern at inference that no further open market housing is required (1)
- Development sites: plan should designate development sites (1) / set development boundaries (1); public views in household survey on preferred sites not used (1); settlement boundaries [shown in illustrative maps] should leave room for development

Location issues

- Location: preferred to east of St Just (2); safeguard western strip between settlements and heritage coast (2); concern about developments in specific locations
- Conservation areas: concern about over-development (2)
- Open spaces between settlements (AD7): concerns about limitations; clarification sought (1); policy not essential (1)
- Panoramas, vistas and views (AD8): strengthen (4); specify views (3); policy meaningless (1); support (1)

Traffic and parking

- Traffic congestion - general (4)
- Improve details of parking requirements in new developments (2)

Renewables and energy efficiency

- Plan should be more ambitious (1)
- Solar panels should be a requirement (1)
- Wind turbines: strong objection to any use (1); map thought not to be clear (1)
- Strengthen requirements on energy use and ecological standards Set ecological standards for new homes (2)

Other

- Refer explicitly to the south of the parish (1); refer to potential conservation areas there (1)
- Strengthen biodiversity policy (1)
- Restrict re-purposing of commercial sites (1)
- Allotments (AD12): avoid being restrictive (1); should include proper use of land (1)
- Commercial development should not be adjacent to conservation areas (1)
- Community facilities: the Parish does not need so many (1)

General

- A number of detailed amendments were proposed, mainly for the plan sections on appropriate development and building design
- Procedures: issues about planning applications, including strengthening impact statement requirements (2)
- Role for AONB, WHS and heritage organisations as partners, advisors and consultees (with a requirement to consult) (2)
- Generally policies are over-prescriptive (1)
- Criticism of process of drawing up policies and lack of community engagement at this stage (1)

NOTE: Comments on current planning decisions are not cited.

The full list of community responses and replies to these / action taken is at Appendix 2.

Final draft Neighbourhood Development Plan

The St Just-in-Penwith NDP Steering Group have amended the draft St Just-in-Penwith Neighbourhood Development Plan from comments received during the Pre-Submission Consultation from statutory organisations, voluntary organisations, businesses and members of the community.

The St Just-in-Penwith Town Council approved the draft St Just-in-Penwith Neighbourhood Development Plan proposal at their Council Meeting on 30 November 2020.

APPENDICES

APPENDIX 1: PRE-SUBMISSION CONSULTATION (REGULATION 14) FORMAL CONSULTEE RESPONSES

The table sets out the statutory and community organisations that were consulted during the Pre-Submission consultation stage of the Neighbourhood Plan process.

Organisation	Comment received	Action taken
Cornwall Council NP team		
Sennen Parish Council		
St Buryan Parish Council		
Sancreed Parish Council		
Madron Parish Council		
Morvah Parish Meeting (Council)		
Homes England		
Regulator of Social Housing		
Natural England	Natural England does not have any specific comments on this draft neighbourhood plan.	None required
Environment Agency		
Historic England	In previous to Cornwall Council on the associated SEA Screening Opinion for the Plan we had drawn attention to the desirability of ensuring that policy provision for wind energy creation did not inadvertently have the potential to lead to harm being caused to the historic environment. In response, we received further information and this together with modified wording to the policy allowed us to confirm the view that a full SEA would not be required and that there were then no outstanding issues associated with the Plan likely to attract on-going comment. While in response to this latest consultation we can therefore confirm that there are no specific issues upon which we wish to comment we would like to applaud your community on the scope and depth of its policy coverage, particularly in its attention to providing informed focus on	None required

	the protection and enhancement of the Plan area's distinctive historic character.	
Network Rail		
Highways Agency	We are satisfied that the Plan's proposed policies are unlikely to result in development which will adversely impact on the strategic road network and we therefore have no comments to make.	None required
Marine Management Organisation		
Three (mobile)		
O2 and Vodafone		
EE		
Ofcom		
Royal Cornwall Hospital Trust		
Kernow CCG		
Healthwatch Cornwall		
National Grid	An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines. National Grid has identified that it has no record of such assets within the Neighbourhood Plan area.	None required
Western Power Distribution		
EDF Energy		
Wales and West Utilities Limited		
South West Water	Acknowledgement: 'No specific comment'	None required
<i>Community and voluntary bodies whose activities benefit all or part of the neighbourhood area</i>		
Age UK St Just		
Sustainable Pendeen		
Bosavern Community Farm		
<i>Bodies which represent the interests of different racial, ethnic or national groups in the neighbourhood area (none known)</i>		
<i>Bodies which represent the interests of different religious groups in the neighbourhood area</i>		
St Just PCC		

St Just Free Church	Query requesting clarification	Clarification provided
<i>Bodies which represent the interests of persons carrying out business in the neighbourhood area</i>		
NFU		
Tregothnan estates and other landowners (also consulted in earlier round and at drafting stage of Plan). Individual landowners – also consulted via house-to-house leafletting	Reply received from an agent representing unspecified local landowners as well as his own views (reply not broken down between these). Details are in the list of residents' comments.	n/a
Cornwall Chamber of Commerce		
Individual small businesses - via house-to-house leaflet	(Also consulted via household survey))	
Land's End Airport / IOSS	(Consulted in stakeholder meeting)	
<i>Bodies which represent the interests of disabled persons in the neighbourhood area</i>		
disAbility Cornwall		
People First		
<i>Other bodies</i>		
AONB	(Consulted in stakeholder meeting)	
National Trust	(Consulted in stakeholder meeting)	
Cornwall Wildlife Trust		
Tin Coast Partnership	(Consulted via National Trust)	
Penwith Landscape Partnership	(Consulted in stakeholder meeting)	
Cornwall Buildings Preservation Trust		
CAA		
<i>Housing</i>		
LiveWest	(Consulted in stakeholder meeting)	
Cornwall Housing		
Land's End Peninsula Community Land Trust	(Consulted in stakeholder meeting)	
Cornwall Community Land Trust	(Consulted in stakeholder meeting)	
<i>Schools etc</i>		
St Just Primary School		
Cape Cornwall School		
Pendeen Primary School		
Nancherrow Project		

APPENDIX 2: PRE-SUBMISSION CONSULTATION – INDIVIDUAL COMMUNITY RESPONSES

The table below sets out the individual comments received from members of the community during the Pre-Submission consultation and the action taken.

Page/ Policy No	Comment	Response from NP	Action to be taken
None specified	<p>Ref 01/2020 - 11th October - Parishioner</p> <p>The development - has turned into something which appears to go against all the plan's aims and objectives and as such, I fail to see why in the light of the Neighbourhood Development Plan it was granted planning permission.</p> <p>There are four houses on the site. They are all detached and very large. They are also extremely high compared to many of the houses in Truthwall which is a pleasantly mixed varied settlement. Due to the high specifications of these four houses they will take almost two years to finish and cost in the region of £500,000 each.</p> <p>In the light of the supposed initiative to build properties that are affordable starter homes or even homes suited to people with mobility issues do you not feel the council is somewhat shooting itself in the foot allowing this luxury development which frankly is out of keeping with Truthwall as a whole? One property of this type with perhaps two (affordable) smaller houses and a bungalow would have been far preferable.</p> <p>As it is I am often taken aback at the complains aired regarding the cost of property in the area as bring too high for local young people to purchase. This is pure naievity as you would be hard pressed to find houses for sale at less than £180,000 in any other part of the country. I appreciate that there are fewer jobs here than some industrial cities but in these areas the starting prices for property usually begin at £300,000! With this in mind one wonders exactly who will be paying to purchase these four new properties in Truthwall?</p> <p>If the Neighbourhood Development Plan is really concerned with preserving this delightful area and providing homes for young people and families whilst maintaining the character of the the St Just area why are substantial luxury developments like this being passed by the council?</p>	<p>Steering group reply – 12th October</p> <p>Thankyou for your response. Unfortunately, the Neighbourhood Development plan is not currently in force and therefore its contents have not been considered in planning applications. If all goes to plan it will come into force next year. If you could consider the various policies in respect of your concerns with regards to development in Truthwall. It would be really useful to know whether you think they would have an impact.</p> <p>Parishioner Reply</p> <p>Of course they would have an impact as it would mean that small enclaves of large expensive houses wouldn't be built! Especially in areas designated as being of particular Historical Interest such as Truthwall..</p>	None
one specified	<p>Ref 02 /2020 - 13th October - Parishioner</p> <p>I have just reviewed the "Neighbourhood Development Plan-Policies" and cannot argue with the policies. All good words if they can be implemented.</p> <p>However I would like to see a clause to say that the residents of the neighbourhood have the power to stop any detrimental housing development that negatively impacts the current residents. For example if a planning submittal is put forward and it is rejected by the St Just Town Council and the majority of the neighbourhood residents that should be the end of the planning application. If it still goes ahead for approval by the County Council or even the Planning Inspectorate in Bristol and is approved by people who do not live in or understand the area what is the point of the Neighbourhood Development Plan? Except perhaps to make the residents feel good that somehow they can influence neighbourhood planning when in reality they cannot.</p>	<p>Steering group reply – 21st October</p> <p>Unfortunately, we will not be able to create a policy along the lines that you have suggested, a neighbourhood plan cannot change the current process that developers have to go through in order to get planning permission.</p> <p>As you know, every person has the right to object to a planning application and this is something that the town council does consider when making their decision.</p> <p>We feel that we have reflected the community's preferences in our policies and once the plan is in force, the town council and the county council will be mandated to refer to it when making their decisions.</p> <p>So effectively we will all have a say in which development proposals are supported or not supported, once the plan is in force,</p>	None
None specified	<p>Ref 03/2020 – 14th October – Parishioner</p> <p>Thankyou</p>	<p>Steering group reply – 16th October</p> <p>You are most welcome, thankyou</p>	None
Policy AD1	<p>Ref 04 /2020 (email 1) - 15th October - Parishioner</p> <p>I would like you to consider my comments on the draft policy AD1 which takes its justification from the response to Q97 in the household survey 'Defining Development' and</p>	<p>Initial Steering group reply to (email 1&2) – 21st October</p> <p>Your representations were discussed at length at last night's meeting.</p>	None

	<p>is summarised in paragraph 51. The policy AD1 states: 'The size of the development should in no case be greater than 20 units and no further development will be permitted adjacent to the site that would make the total number of units in the combined development in excess of 20 for the duration of this plan'. I am basing my comments on the assumption that the objective of Q97 is to define a level of development that is acceptable to the consensus of the majority of the respondents, on the presumption that the creation of an NDP is a democratic process that recognises a majority. Paragraph 51 correctly states that, 'Only 14% of respondents thought that developments of more than 20 houses would be acceptable'. This leading statement emphasizes and implies that the majority, 86%, of respondents find that a maximum of 20 housing units in a development is acceptable, although the data for other views are stated. More in-depth analysis shows a different picture. Please consider the following facts and observations: 1. 244/26.35% of respondents believe that 5 housing units should be the maximum. 2. 234/25.27% of respondents believe that 10 housing units should be the maximum. 3. 316/34.13% of respondents believe that 20 housing units should be the maximum. This is the most popular view chosen, and the view incorporated into the policy AD1. 4. What I believe has not been taken into account is that the respondents in points 1 & 2 above, believe that 20 housing units in a development is excessive. Their combined views 244/26.35% +234/25.27% equate to a majority view of 478/51.62% that 20 housing units in a development would be excessive. 5. By choosing the 20 housing unit view the policy is in conflict with the majority view of the respondents, that there should not be development in excess of 10 housing units. More respondents are of the view that 20 housing units in a development is excessive, rather than acceptable. The difference in impact on the environment between 20 housing units and 10 housing units is huge. I request that Policy AD1 be amended to reflect the majority view that there should not be more than 10 housing units. , I also request that Paragraph 51 be amended to reflect the wishes of the majority of respondents that there should not be more than 10 housing units. There is no democratic majority justification for the policy as it stands.</p> <p>(Email 2) - 16th October I have now given further consideration to the issue I raised, in a comment submitted to you on the 15th October 2020, concerning draft Policy AD1 and Paragraph 51. I have now consolidated my thoughts, and in the interest of clarity and to dispel any ambiguity I would like this document, containing the following statement, to be attached to my original submitted comment and read in conjunction with that original comment. The majority of respondents to the household survey 'Defining Development', commenting on Question 97, clearly wish the maximum number of housing units on any new residential development to be 10 units or less. That statement is backed up by data in your evidence document and detailed in my first comment. The Policy AD1 should read: Developments should be of a scale which is proportionate to the size and character of the existing settlement in which they are to be sited or which they would adjoin and conforms to</p>	<p>The team thank you for your comments and feel that they are valid and worthy of further consideration and discussion. We would like more time to consider your comments and ask that you trust that we will give your comments full consideration. We will respond to you within the next three weeks with a full update. We may also next to request the assistance of our professional advisors.</p> <p>Subsequent Steering group reply on 11th November to (email 1&2) Regarding your representations on policy AD1 and your view that the limit of the number of homes per development is reduced from 20 to 10. We discussed this at length within the steering group, over two meetings. We have decided to leave the policy wording as it is, i.e. that the size of developments should be no greater than 20 homes. Our rationale is as follows: The analysis of the data is correct in that a majority (51.5%) of respondents indicated a maximum of 10 properties in a development. This however is a small majority whereas 86% indicated 20 or less with the maximum of 20 being the most popular (modal) value. It is a requirement of a Neighbourhood Development Plan that it is permissive i.e. it allows development but that development can be of a size and form preferred by the residents. The most important clause of Policy AD1 is the first sentence which states :- "Developments should be of a scale which is proportionate to the size and character of the existing settlement in which they are to be sited or which they would adjoin and conforms to AONB guidance." This is a reinforcement and reiteration of the Cornwall Local Plan Section 9 Rural Exception Sites which allows development outside of settlements only as affordable led and in response to an identified housing need and quotes ".....and would be well related to the physical form of the settlement and appropriate in scale, character and appearance." The 20 units is a catchall and also puts a limit on aggregation such that sporadic development cannot exceed 20 units over the life of the plan. In practical terms, in order that a developer produces affordable houses in response to a local need a development needs to be of such a scale as to make it financially feasible and this is unlikely with developments of fewer than 10 houses.</p>	<p>None</p> <p>None</p>
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	<p>AONB guidance. The size of the development should in no case be greater than 10 units and no further development will be permitted adjacent to the site that would make the total number of units in the combined development in excess of 10 for the duration of this plan. The only exception to this limit would be for sites on previously developed land within existing settlement boundaries. In such cases the development footprint must not exceed that of the previously developed site, including curtilage developments where these would visually encroach into the undeveloped space.</p> <p>Paragraph 51 should reflect this amended policy.</p> <p>(Email 3) – 15th November</p> <p>Comments: 1. The objective of Q97 in the household survey was to establish the maximum number of properties (units) that could be built in any single development or any joint development should they be adjacent. You have, in the above document, accepted that there is a majority consensus among the survey respondents, 51.5%, that any development should have a maximum number of 10 units or less. This means that any development with more than ten units would be viewed as excessive. 2. "This however is a small majority" A majority is a majority regardless of its size. The creation of an NDP is a democratic process and observing majorities is a fundamental principle in that process. 3. You state a justification for ignoring the established majority, which is, that the value of the group that advocate 20 units per development be added to the value of the established majority to make a substantial 86% majority. The problems with this are that: a) The logical way to determine the point where a majority is reached, from the evidence, is to start at the bottom of the scale and work up, therefore the value of the 20 unit group, 34%, is not relevant in establishing the objective of Q97 in the household survey because the majority is formed with the two bottom groups. b) A 20 unit development would be seen as excessive, so the 20 unit group would conflict with the established majority view that there should only be 10 units or less, therefore the two groups cannot be added together to form your stated 86%. c) All groups are below 50%, therefore the two bottom groups can be added together because the objective is to find a majority consensus. d) Using your rationale, it could be said that 100% of the respondents indicate that 60 units or less is acceptable. e) By ignoring the wishes of the established majority you are moving away from evidenced based decisions. f) The value of the 20 unit group cannot outweigh the established majority. 4. The results of Q97 show that: A 10 unit development would be acceptable to 74% of the respondents, whereas a 20 unit development would only be acceptable to 48.5% of respondents. Maximising what is acceptable development reduces what is seen to be inappropriate development, thereby significantly addressing and complimenting the aim of the Appropriate Development section of the NDP. 5. A policy that advocates a 10 unit maximum development satisfies the following statement. "It is a requirement of a Neighbourhood Development Plan that it is permissive i.e. it allows development but that development can be of a size and form preferred by the residents". 6. I do not know why you included the following paragraph in your response because it can be applied just as easily to a 10 unit maximum policy. The most important clause of Policy AD1 is the first sentence which states :- "Developments should be of a scale which is proportionate to the size and character of the existing settlement in which they are to be sited or which they would adjoin and conforms to AONB guidance. "This is a reinforcement and reiteration of the Cornwall Local Plan Section 9 Rural Exception Sites which allows development outside of settlements only as affordable led and in response to an identified housing need and quotes ".....and would be well related to the physical form of the settlement and appropriate in scale, character and appearance.". 7. Please can you indicate what is the evidential basis for the following statement: "In practical terms, in order that a developer produces affordable houses in response to a local need a development needs to be of such a scale as to make it financially feasible and this is unlikely with developments of</p>	<p>Steering group reply to (email 3) 23rd November</p> <p>The steering group have carefully reviewed your further comments in relation to the response you received from them on 11th November. I will respond to your numbered comments accordingly.</p> <p>1,2,3,4,5,6. We sought advice again on policy AD1 and received the advice to leave the ceiling at 20, this allows for flexibility to deliver housing that will fulfill an identified local need, as per the housing needs survey. Limiting the ceiling to 10 may result in multiple developments of 10 houses around the parish, and it could very well attract a legal challenge from the affordable housing team, because limiting the size of developments like this will affect viability and may reduce the percentage of affordable housing units delivered on sites. We are confident that there are other policies in the NDP, and in the Local Plan and NPPF that will operate with this policy and limit many sites to 10 units or fewer in particular cases. This will be especially carefully regulated in the AONB, where 'proposals must conserve and enhance the landscape character and natural beauty of the AONB.'</p> <p>I know that this is not what you want to hear and I apologise for that. We are caught between a rock and a hard place with this policy and it will be impossible to please everyone, however all is not lost. There is a further consultation stage, Regulation 16 'Publication' consultation, which Cornwall Council has to hold after we submit the documents. This specifically enables people to check whether we have made changes as a result of comments received at Regulation 14. So, just as Affordable Housing may comment if we do lower the limit, you will also be able to comment again at Regulation 16 if you are not satisfied with our explanation, your comments will be considered by the Examiner as part of the Examination. We do all wish you well with this, our decision has been made with the community at large in mind, it does not necessarily represent our personal views.</p> <p>7. It would be wrong for us to comment on any current planning proposals.</p> <p>8. Reliance on 'Affordable Led'(assumed to mean S106 discounted housing) development to satisfy the identified housing need comes with a number of problems, S105 housing falls outside of the 'Help to buy' scheme and so relies on mainstream lenders to finance the purchase. Currently there are very few lenders in the Discounted Housing market and these require higher than normal deposits making these properties beyond most first time buyers. Due to the higher than normal build costs in our area the mix of open market to affordable</p>
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	<p>fewer than 10 houses." There is at present, in the parish, an approved application by REDACTED for 6 dwellings, 3 of which are affordable. There is also an application by REDACTED pending a determination, for 8 dwellings, 4 of which are affordable. If the application is refused it will not be because of financial viability because that has already been approved. With a small piece of research I am sure that I will find many such small developments across Cornwall that incorporate affordable housing and consequently the above statement appears to be speculation only, which cannot be a sufficient reason to justify this statement. 8. If the following statement is correct (I don't believe it is), "In practical terms, in order that a developer produces affordable houses in response to a local need a development needs to be of such a scale as to make it financially feasible and this is unlikely with developments of fewer than 10 houses." Q97 becomes meaningless. If you insist that a development has to be over 10 units you will have to re-consult the community, explaining the situation and produce the evidence to indicate why and how you speculate that a development of fewer than ten houses would not be financially viable. Otherwise, you would be making unilateral decisions about an important issue or policy which I do not believe you have the authority to make. The NDP team has produced a very good Neighbourhood Development Plan which unfortunately it is let down by Policy AD1 as it stands. The whole ethos behind an NDP is that it reflects the wishes of the community. That is a basic requirement of the process. Your insistence that the policy AD1 will not be changed, disregards an accepted majority wish, on the basis of unconvincing justification, containing incorrect information. The policy is supposed to address "appropriate development" and as it stands it fails to maximise the number of people that would find a development, containing the maximum number of units allowed, appropriate. (See point 4 above). Policy AD1 is one of the major policies in the plan. At present it does not support the strength of feeling that can be seen in the survey evidence for protecting our environment and heritage. As I stated in my original comments, the difference in the impact on our environment, and heritage assets, between a 10 unit development and a 20 unit development is significant. This NDP that is being created will shape and define the environment in which we live, and we (the whole community), will ratify it at the end of the process through referendum. It has to be what the community wants. I have considered what you have said, what the evidence tells me, and what I believe to be right, and come to the conclusion that I will contest your decision to keep the policy AD1 unchanged, as much as the process allows.</p>	<p>dwellings in a development will rarely exceed 50%; hence to satisfy the identified housing need via this route will lead to a near equivalent number of open market dwellings being built. The logical solution is the use of Social housing providers to satisfy the housing need. To this end this policy was formulated after direct consultation with two providers of Social housing and Cornwall Council. The question was 'what is the smallest development that you would consider in an area' the answer was unequivocal that a development of 10 houses was too small to be considered.</p> <p>Any policy in the NDP must, as a matter of process, pass examination by an independent examiner and provide evidence for that policy. Advice is that a policy that set the development size level at such a point as to effectively block off the provision of affordable dwellings to satisfy our identified need would be unlikely to pass examination.</p> <p>Thankyou for sharing your views with us, we have made significant changes to the draft plan, all of which will be published by Cornwall Council during the regulation 16 phase of the process.</p>	
<p>Page 6, Policy AD1, Policy AD3, Policy AD4, Policy RE2.</p>	<p>Ref 05/2020 (email 1) – 20th October – Parishioner</p> <p>I'm attaching comments on the Neighbourhood Development Plan, there may be more to come from me but maybe these ones will be with you in time for your discussion this evening. You've all done a grand job and produced an impressive document. My comments are intended to reinforce the work you've done and will hopefully be taken as a positive contribution.</p> <p>My first comment is that I think this is an impressive document which is well presented and well thought out. Congratulations! I am in general agreement with the direction of the draft plan and there is little with which I disagree but I do think that in places it could be strengthened and that it could seek to achieve a higher standard of planning applications.</p> <p>The South of the Parish</p> <p>After reading the draft I was left feeling that I'd read a plan only for the north of the parish ie the Cot to Morvah. The plan contains, I think, only one passing mention to anywhere south of the Cot in a reference to holiday homes between Trewellard and Escalls. I would like to suggest that a sentence or two be included in section 5 – This is our Parish, acknowledging the</p>	<p>Steering group reply to (email 1) 4th November</p> <p>As below</p> <p>The South of the Parish</p> <p>The team agreed with your observations, The section "This is our Parish" will be re-written to be more inclusive to the South of the Parish.</p>	<p>Amend the relevant section in the plan to be</p>

	<p>existence of the south of the parish and explaining briefly why it is less prominent in the plan than the north. For residents of Trevegean, Nanquido, Escalls, Kelynack etc this might foster a more positive view of the plan and for those beyond the parish boundary, such as the independent assessor, it will address what may otherwise be seen as a weakness.</p> <p>Policy AD1 I think you need to look at this again. The majority of people answering question 97 (51%) opted for developments to contain no more than 10 units, 26% opted for a ceiling of 5, 25% opted for a ceiling of 10 while 34% opted for a ceiling of 20. The ceiling should surely be 10.</p> <p>Given that elsewhere the plan opts for development using in-fill and rural exception sites it follows that develop would be concentrated in or adjacent to existing settlements. These settlements contain much of the heritage of the area and the survey demonstrates that residents prize this heritage highly with over 90% of respondents supporting preservation of the historic environment (Qs 12, 13 and 15) The majority of the settlements are small and would be dwarfed and fundamentally altered by an adjacent development of 20 dwellings.</p> <p>As it stands this policy, with a ceiling of 20 dwellings, runs counter to the objective of Policy AD2 (para 54) To protect the character and historic significance of the designated Conservation Areas within the Parish.</p> <p>AONB and WHS The plan calls for the advice of the AONB and the WHS to be heeded (AD1 & AD4). This can only take place if those two bodies are invited to consult on planning applications. While this is usually the case it does not always happen, they are not statutory consultees. I suggest that the plan includes a requirement that these bodies be consulted as a matter of course, at least for all new builds or re-purposing applications.</p> <p>Impact Statements From my own experience I am aware that planning applications are almost always submitted without most of the required documentation and that they are often opened to comment before much of this documentation has been submitted. In many cases this paperwork is never submitted and where it is submitted it can be very substandard. With regard to heritage this issue is partly covered by Policy AD3 but this policy does not directly address the issue of incomplete applications so I would suggest that applications should not be opened for comment until Environmental Impact Assessments Heritage Impact Assessments, Flood Risk Assessments and similar have been completed and submitted.</p> <p>Renewable Energy I suggest that all new build be required to have solar panels unless good reason can be shown why this should not be the case. In the case of affordable houses the provision of solar panels will substantially reduce the running costs of the house making it more truly affordable.</p> <p>The draft Cornwall Climate Change Development Plan refers to heat networks as a more efficient way of heating houses. (Policy 13). These shared resources can be communal heating schemes powered by Air Source or Ground Source Heat Pumps which both reduce the carbon footprint of developments while also lowering the running cost of the individual houses. New developments should at least be required to consider how houses will be heated and produce a viability report assessing such a heating system. Gas heating will not be an option from 2025.</p>	<p>Policy AD1 We have sought professional advice from our Council support lead officer and have held lengthy discussion previously as to whether we got this right. We are still in discussion about this point and have decided not to make a decision as to whether or not to change this policy until all public comments have been received at the end of the public consultation.</p> <p>AONB & WHS Neither are statutory consultees as you point out and as such developers are not mandated to consult with them. Unfortunately, it is not within our gift to change this position. A policy as you suggest would not be legal and would not stand up to scrutiny by the independent assessor.</p> <p>Impact Statements The steering group felt that they could not impact upon the quality of planning applications. It was felt that they had done as much as possible within policy wording to ensure that developers consulted and paid due regard to the advice of governing bodies, as set out in the AD policies.</p> <p>Renewable Energy The group discussed your suggestion, a neighbourhood plan cannot legally force a developer to install solar PV panels. We submitted many different policy suggestions around this, most had to be modified to ensure that the policy was legal and would stand up to the scrutiny of the assessor. The resulting policies in RE section do go some way to addressing your representations. We can say that they cannot be strengthened any further (legally) and that we have done all we can within the remit of a neighbourhood plan, to encourage developers to use renewables.</p> <p>Subsequent Steering group reply to Policy AD1 sent on November 11th. AD1 Regarding your representations on policy AD1 and your view that the limit of the number of homes per development is reduced from 20 to 10.</p>	<p>more inclusive.</p> <p>None</p> <p>None</p> <p>None</p> <p>None</p> <p>None</p>
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	<p>Ref 05/2020 (email 2) - 16th November - parishioner as above</p> <p>Thank you for your response to my suggestions which I sent to you on 20 October, however I feel that I must respond to your decisions.</p> <p>South of the Parish</p> <p>I am pleased that you have decided to address the issue regarding the South of the Parish.</p> <p>Policy AD1</p> <p>Regarding policy AD1 I am aware that one of my fellow residents has written to you about your response to this question ie whether the development ceiling should be 10 or 20 dwellings, and since I am in complete agreement with what he was written I refer you to his letter and say only that I remain convinced that you have reached the wrong conclusion. The key point here is that over 50% of respondents indicated that anything over 10 units would be excessive thereby rendering it illogical to combine their votes with the 34% who voted for 20 units. There is no 86% majority for a ceiling of 20, there is a 51.5% majority for a ceiling of 10. However, in assessing your response to my remarks on policy AD1 and looking again at the wording of the policy, I think there are other issues. The second sentence of the policy reads: The size of the development should in no case be greater than 20 units and no further development will be permitted adjacent to the site that would make the total number of units in the combined development in excess of 20 for the duration of this plan. I think that this begs a number of questions, the answers to which may well undermine the intention of the policy.</p> <p>1. We have two fields both adjacent to a settlement and owned by two different people. Field A is developed up to the permitted ceiling of 20 dwellings by developer A. Would developer B be allowed to develop field B as an independent development?</p> <p>2. If B is denied permission to develop field B because it is adjacent to already developed Field A could he legitimately apply for permission to develop another field, Field C which is adjacent Field B?</p>	<p>We discussed this at length within the steering group, over two meetings. We have decided to leave the policy wording as it is, i.e. that the size of developments should be no greater than 20 homes.</p> <p>Our rationale is as follows:</p> <p>The analysis of the data is correct in that a majority (51.5%) of respondents indicated a maximum of 10 properties in a development. This however is a small majority whereas 86% indicated 20 or less with the maximum of 20 being the most popular (modal) value.</p> <p>It is a requirement of a Neighbourhood Development Plan that it is permissive i.e. it allows development but that development can be of a size and form preferred by the residents. The most important clause of Policy AD1 is the first sentence which states :- "Developments should be of a scale which is proportionate to the size and character of the existing settlement in which they are to be sited or which they would adjoin and conforms to AONB guidance."</p> <p>This is a reinforcement and reiteration of the Cornwall Local Plan Section 9 Rural Exception Sites which allows development outside of settlements only as affordable led and in response to an identified housing need and quotes ".....and would be well related to the physical form of the settlement and appropriate in scale, character and appearance."</p> <p>The 20 units is a catchall and also puts a limit on aggregation such that sporadic development cannot exceed 20 units over the life of the plan. In practical terms, in order that a developer produces affordable houses in response to a local need a development needs to be of such a scale as to make it financially feasible and this is unlikely with developments of fewer than 10 houses.</p> <p>Steering group reply to (email 2) 23rd November</p> <p>The steering group have carefully reviewed your further comments in relation to the responses you received on the 4th and the 11th November.</p> <p>AD1</p> <p>We sought advice again on policy AD1 and received the advice to leave the ceiling at 20, this allows for flexibility to deliver housing that will fulfill an identified local need, as per the housing needs survey. Limiting the ceiling to 10 may result in multiple developments of 10 houses around the parish, and it could very well attract a legal challenge from the affordable housing team, because limiting the size of developments like this will affect viability and may reduce the percentage of affordable housing units delivered on sites.</p> <p>We are confident that there are other policies in the NDP, and in the Local Plan and NPPF that will operate with this policy and limit many sites to 10 units or fewer in particular cases. This will be especially carefully regulated in the AONB, where 'proposals must conserve and enhance the landscape character and natural beauty of the AONB.'</p> <p>I know that this is not what you want to hear and I apologise for that. We are caught between a rock and a hard place with this policy and it will be impossible to please everyone, however all is not lost. There is a further consultation stage, Regulation 16 'Publication' consultation, which Cornwall Council has to hold after we submit the documents. This specifically enables people to</p>	None
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	<p>Put another way, does the limit apply to all development around a single settlement for the length of the plan's life irrespective of how many developers there are? If it does is the right to develop allocated simply on a first come first served basis and is this legal? If the limit applies to individual developments then:</p> <p>3. how is proportionality applied? Say a settlement has 28 houses and a new development of 7 houses is deemed to be acceptable in so far as it is proportionate. This settlement now has 35 houses. Does the proportionate ceiling now become 9 houses with the result that a second development by a second developer would see the settlement grow to 44 houses? Or does the size of the original settlement remain the yardstick for proportionality?</p> <p>While I applaud the intention behind this aspect of the policy it seems it may have a number of potential problems which may well mean that it does not achieve the intended goal of enforcing a development ceiling in relation to a given settlement. If this is the case then it is all the more important that the ceiling be set lower in order to get some control over the pace and degree of development. It may be that the underlying policies and legalities for this aspect of AD1 are clearly laid out elsewhere but I have failed to find them and am therefore concerned that that AD1 may contain fatal flaws. AD1 is probably the most important policy in the plan and it is vital that it can achieve the goal set for it which is the conservation of our heritage as so strongly supported by the respondents to the questionnaire.</p> <p>AONB and WHS</p> <p>Your response to my suggestion with regard to the AONB and WHS leads me to think that my suggestion may have been misunderstood. What I suggested was as follows: The plan calls for the advice of the AONB and the WHS to be heeded (AD1 & AD4). This can only take place if those two bodies are invited to consult on planning applications. While this is usually the case it does not always happen, they are not statutory consultees. I suggest that the plan includes a requirement that these bodies be consulted as a matter of course, at least for all new builds or re-purposing applications</p> <p>As I understand the position developers are not mandated to consult with statutory consultees. In my experience consultation is done by the LPA and whether they consult with statutory consultees is left to their discretion. My aim was not to require developers to consult with the AONB and WHS, it was to highlight the importance of having AONB and WHS included as consultees by CCC planners. As I said, this is usually the case but I am aware of occasions when it has not happened.</p> <p>The management of the Cornwall AONB is delegated to the Cornwall AONB Partnership by Natural England who hold top level responsibility for such areas under the Countryside and Rights of Way Act 2000. Natural England is a statutory consultee in the planning process so for the Cornwall Partnership to be carry out the responsibilities delegated it should be treated as a statutory consultee. Whether or not it is treated as statutory consultee is not really very germane to my proposal, it merely highlights the nature of the position occupied by the AONB partnership.</p> <p>Local authorities must consider the potential impacts of their decisions and activities within the AONB. To do this in an informed manner requires that the AONB be consulted.</p> <p>In policy AD1 the policy states that: Developments should be of a scale which is proportionate to the size and character of the existing settlement in which they are to be sited or which they would adjoin and conforms to AONB guidance.</p> <p>There is a clear assumption that the AONB will be consulted and all I am suggesting is that this assumption be set out more clearly to ensure that the required advice is actually available.</p>	<p>check whether we have made changes as a result of comments received at Regulation 14. So, just as Affordable Housing may comment if we do lower the limit, you will also be able to comment again at Regulation 16 if you are not satisfied with our explanation, your comments will be considered by the Examiner as part of the Examination. We do all wish you well with this, our decision has been made with the community at large in mind, it does not necessarily represent our personal views.</p> <p>There are always going to be "what if" questions, however the wording in this policy is clear, subsequent development would not be permitted, adjacent to the site, for the duration of the plan.</p> <p>If the independent assessor deems this to be unlawful, the policy will be amended at regulation 17, and again there is the further consultation at reg 16 that you could comment on.</p> <p>AONB and WHS</p> <p>We cannot influence who CCC include as statutory consultees unfortunately.</p> <p>With regard to the WHS, policy AD4, we have listened to your views and will amend the policy wording to "1 . Follow guidance set out in the current versions of the WHS management plan and the WHS SPD, developers are also encouraged to invite the WHS to consult at pre-application stage."</p>	<p>Amend policy</p>
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	<p>Policy AD4 similarly states that developments within the WHS should “follow the guidance set out in the current versions of the WHS Management Plan and the WHS Supplementary Planning Document.”. My proposal, in relation to the WHS, is simply to go one step further than seeking compliance with SPD by ensuring that the WHS should always be invited to consult on applications in Area 1 of the Cornish Mining World Heritage Site. Who better to judge whether developments follow the guidance in the SPD? This is an area of expertise best served by the WHS planning team.</p> <p>I do not feel that your reply addressed my proposal so I would ask that you look at this issue again.</p> <p>Renewables</p> <p>Having reread BD2 I'm happy with your response on solar panels. BD2.1 seems to meet my objective as far as is reasonably practicable. However you have not addressed my comments on heating which is the most expensive and polluting form of domestic energy use. Solar panels only address this to a degree in so far as they can heat water. A preferred option to replace gas is required and we should not be waiting until 2025 to define what this may be.</p> <p>Impact Statements</p> <p>I note that AD10 does in fact include a requirement along the lines of what I have proposed in respect of biodiversity/ecology, in so far as it requires would be developers to carry out of wildlife survey and demonstrate how any identified rarities would be protected and what mitigation measures would be applied.</p> <p>Why can this approach not be applied to other core issues such as heritage, flooding, contamination etc.</p> <p>In respect of AD10.3 I suggest that if we make action contingent upon the discovery of rarities, we will soon be in a position where most species are either rare or extinct. Rather than a wildlife survey, which suggests that it would not include plants, what is really required is an ecological survey which looks at both the site and it's context so that the impact of the development upon the surrounding area, not just the site itself, can be assessed. The essence of this is that this sort of survey should take a holistic approach recognising that everything is connected to everything else and that rarities are supported by the commonplace. For instance, I have recently read a tree survey in which only the significant specimens in a small group of trees were accorded any value ignoring the fact that the commonplace sycamores provided both screening for the specimen trees and also extended wildlife habitat, as well as forming part of the group in the landscape. Picking the elements apart and assessing their individual value is classic divide and rule and should not be applied to a landscape of interlocking and interdependent aspects.</p> <p>My observations and suggestions are intended in a positive spirit and in the hope that they will help to add value to the NDP. The NDP is a document which will be crucial to the development and protection of our environment over the next ten years and my comments are intended to support the work done by the team in producing the draft plan now under consideration. I am aware of others who have expressed the view that the plan is 'nice words with no teeth'. I am more optimistic than that but I do think that we should be looking for a better return on the investment of so much time and effort. While an NDP may have to be 'permissive' it is also a fact that planning is all about restrictions and permissive in this context means nothing more than the fact that regulations should</p>	<p>Renewables</p> <p>We are satisfied that the policy BD3(2) goes as far as we can regarding heating systems, a NHP cannot dictate how a developer should heat a new build.</p> <p>Impact Statements</p> <p>We have listened to you and have completely reworded policy AD10 to</p> <p>Policy AD10 – Proposals for development must</p> <ol style="list-style-type: none"> 1. Be accompanied by a preliminary ecological survey outlining the biodiversity of the site. 2. Provide a detailed plan of how biodiversity on the site will be conserved and enhanced to demonstrate how long term biodiversity net gain will be achieved. 3. Where a preliminary survey identifies the existence of threatened or unique to the area, flora or fauna, a more detailed survey will be required identifying particular species and the threat to them. 4. Where a particular threat is identified by a survey, demonstrate how such a threat will be mitigated. 5. If the loss of mature tree woodland, Cornish hedges, hedgerows or other habitat cannot be avoided, provide details of mitigation measures that will still achieve a biodiversity net gain within a decade. <p>Other things like heritage, flooding and contamination are covered by national policy. We feel that our policies around heritage are as strong as they can legally be.</p> <p>Once again, thank you for your participation in this process.</p>	<p>None</p> <p>Amend policy</p> <p>Amend policy</p>
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	not be so tight as to make all all development impossible.		
BD5,	<p>Ref 06/2020 - 25th October - Parishioner</p> <p>1. It is impossible to park close by most days in the holiday season, and very difficult outside of the season. Driving up and down the Cape Road requires a great deal of patience and a good deal of manoeuvring. The volume of traffic makes a very short journey into an arduous one. Imagine then, driving down the Cape Road to come home, failing to find parking, turning and driving back up the Cape Road, then walking home laden. This is a regular reality for inhabitants of these terraced properties.</p> <p>2. The volume of traffic on Fore Street, Bosorne Road, and Cape Road is already very heavy. Is it sensible to increase the population of St Just when the road infrastructure struggles to deal with current volume?</p> <p>3. Additionally, to anyone attempting to get an appointment, the Doctors surgery does not appear to be carrying spare capacity.</p> <p>4. Where are the employment opportunities? Do we continue to develop and attract people to St Just regardless of the lack of employment?</p> <p>Throughout my life I have lived and worked in a variety of places, always driven by affordability and employment opportunities. In other words 'market forces'. If people cannot find employment, or afford house prices in St Just, is the solution to build cheaper housing for people to be unemployed in?</p> <p>At what point do we feel St Just is over populated relative to existing infrastructure and available resources?</p>	<p>Steering group reply – 4th November</p> <p>1- We are unable to impact upon existing traffic density problems, we have covered potential exacerbations to existing problems, as a result of new developments in the draft plan on the traffic and parking policy BD5</p> <p>2- Developers will have to show that the town's infrastructure will be able to cope with any new large scale development. However development is a given, it will happen, and the neighbourhood plan, whilst being permissive has also taken great care to ensure that developments are of an appropriate scale.</p> <p>3 -The NHP cannot impact on the ability to get a Doctors appointment, I believe Cape Surgery is in the process of joining Alverton Surgery, which should improve capacity, however this is something that you may want to discuss with the surgery.</p> <p>4 -Please review our commercial development policies.</p> <p>We have liaised with other governing bodies as a result of the comments and views that were harnessed in the household survey, unfortunately, whilst we do understand your frustrations, the problems that you have highlighted sit outside of the scope of the neighbourhood plan. We can only influence future developments and ensure that they do not add to existing problems.</p>	None
AD11, AD12, BD3	<p>Ref 07/2020 – 4th November - Parishioner</p> <p>Policy AD11 the phrase 'no harm to the character and appearance of the area would result ' . Can this be removed?</p> <p>Policy AD12 Regarding tree planting and growing food on allotments: I don't think we can afford to be picky about how it appears or give any truck to preserving the character of a post industrial denuded landscape. In a climate changed future, we need to plant trees and grow food no matter what, if we are to survive.</p> <p>Policy BD3: Can this Policy go further and actually specify that new homes be built to a particular ecological standard? E.g. The Passive House standard.</p> <p>This has been shown to reduce average household bills to £150/year. This could make it possible for low income households to both eat and heat in the winter and is vital if we want it to be possible for everyone to survive in our parish. We need to be clear about house building standards and be encouraging innovation and new employment.</p> <p>I am also disappointed not to see anything about a program of support to retrofit existing old homes in the parish to make them more energy efficient.</p>	<p>Steering group reply – 11th November</p> <p>Policy AD11 We will amend this policy wording to something along the lines that "no negative impact will result"</p> <p>AD12 - We are happy with this policy in that the opening gambit states, allotment sites will be supported. We all agreed with your comments on the need to grow food, however the majority of our community feel very strongly about preserving our post-industrial denuded landscape. We have to represent the majority view. Statutory consultees such as Natural England, Historic England and others would also undoubtedly object to a proposal to place an allotment on a historic landscape.</p> <p>BD3 - Building regulations don't insist that developers build homes to the standard that you suggest, and unfortunately the NHP cannot conflict with existing national planning policy. A requirement like you suggest would not be a legal one and therefore would not be allowed in a policy.</p> <p>Regarding the retrofit of existing old homes, please see policy BD3 section 4.</p> <p>Parishioner reply - Thanks so much for your considered and full response to my feedback. I understand things more now and that central government policy needs to change fast if we are to survive the emergencies that face humanity.</p> <p>Thanks for doing what you can.</p>	<p>Amend policy</p> <p>None</p> <p>None</p>
Policies AH1,AD 2,AD7,A D8,BD4, BD5,CD 1,CD6	<p>Ref 08/2020 (email 1) 8th November- Parishioner</p> <p>First of all I would like to say a massive thank you to everyone who has worked so hard drafting this plan. It has taken an awful lot of work and I really appreciate your time, effort, commitment and hard work. Here are my comments for consideration:</p>	<p>Steering group reply to (email 1) -11th November</p> <p>As below</p>	None

	<p>Policy AH1: I worry about the impact infill could have on preserving our cultural and historical heritage in conservation areas.</p> <p>Policy AD2: I like this policy because I think it is very important to ensure that if development is going to take place in a within conservation area, it is sympathetic to its surroundings. I particularly like part 5 because the green spaces within these areas are part of their unique character and history and should be preserved. Could there be an example? New Downs?</p> <p>Policy AD7: In theory I completely approve of this policy. My one misgiving is that the maps of settlements seems to have produced many sub divided settlements and maybe there are in fact fewer larger settlements? I worry that the proliferation of defined settlements to the North of the Parish will preclude development in these locations which will put more pressure on St Just town once again.</p> <p>Policy AD8: I think this is a very important policy but would like to see it better defined and strengthened. I would like to see preservation of views and vistas of the original urban/rural interface preserved, and to be specifically mentioned in the policy in the finished plan. In St Just there are many examples of past development that has detracted from the character of the traditional, historical and cultural landscape of our Parish. Examples of this include Penandrea, Cape Close and Carallack Mews. Where the original urban rural interface is still surviving I think it is very important to preserve this. For example the view of the row of original miners cottages on Pleasant Terrace from the Carn Gloose Road. Also Boswedden Terrace and the cottages at Carn Bosavern. This is vital to preserve not just the cultural and historical landscape but it encourages tourism to our Parish and is therefore vital for business.</p> <p>Policy BD4: I'm pleased to see there is a requirement for all new properties to have outside space. I think the recent global pandemic has illustrated the importance of outdoor space for health, emotional and leisure purposes.</p> <p>Policy BD5: Section 2 is vital and should possibly be more defined and strengthened. In St Just any proposed development that brings more traffic through Fore St should be rejected. Development on the edge of town by the Gews Farm development is fine as this does not result in more traffic through our congested town centre.</p> <p>Policy CD1: I am aware that commercial development is sometimes used as a stepping stone to procure housing development permission on a site that would not have been considered had it not previously been developed or used for commercial purposes. Is there anyway a time constraint can be put on the turn around of commercial sites to domestic sites? For example the repurposing of a site that has only been a commercial site for 25 years or less should not be allowed.</p> <p>Policy CD6: I would like to see this policy strengthened. I am aware that the building of new farm buildings that are then fairly rapidly converted to holiday use is a loop hole. Could an age restriction be applied? Only buildings that are 50 years old or more can be converted?</p> <p>(Email 2) – 11th November I really appreciate you taking on board some of my points. However, I feel your reply did not answer my substantive point in AD8. I gave examples to try and illustrate my point, but if you discount those I still feel my issue needs addressing. Can we preserve the original urban/rural interface where it still exists? To me this is a central element of the history and culture of our parish.</p>	<p>AH1 - Conservation policy, AD2 points 1 to 4, ensures that any development within a conservation area has to contribute to the character and setting, there are many mandatory requirements within the policy to ensure that any infill development does not negatively impact on the existing setting.</p> <p>AD2 - The plan has to be inclusive of the whole parish. There are too many examples within the parish to give them all.</p> <p>AD7 - Settlements have been defined by Cornwall Council. Q86 of the household survey "Green spaces between settlements and hamlets should be protected" 91% of respondents agreed with this statement.</p> <p>AD8 - Again the team agreed that there are many important views and vistas in our parish, and in order to be fully inclusive and place equal importance on all of them, we should either list all of them or none of them. As there are so many, the team decided not to alter the existing policy.</p> <p>BD5 - The sections within this policy were written and re-written many times, the first attempts were rejected by assessors as they were found not be legal requirements of developers, and also that they were unduly restrictive of development, when the plan needed to be permissive. Traffic congestion issues have been reported to the Town Council. This is a consideration with all planning proposals. The existing policies do go as far as possible to ensure that developments do not add to existing traffic congestion. See also policy CD5 in relation to commercial developments.</p> <p>Policy CD1 and CD6 – It would not pass legal challenge to add a time constraint on the change of use of a site – even if it was possible, it couldn't retrospectively be applied to a building that already exists.</p> <p>Steering group reply – 18th November Policy AD8, we have decided to amend the wording slightly in order to strengthen the policy. The wording is yet to be decided; however it will highlight that panoramas, views and vistas, that are enjoyed by the wider public (ie public views as opposed to private views). I hope that this goes some way to addressing your concerns.</p>	<p>None</p> <p>None</p> <p>None</p> <p>Page 51 section 15 amended.</p> <p>None</p> <p>Amend policy</p>
<p>AH5 AD1 AD5 AD8 AD11 BD1</p>	<p>Ref 09/2020 – 8th November – Parishioner</p> <p>Firstly, massive thanks for all of your time, efforts and patience in pushing this forward. Having helped distribution of the questionnaires, I was frustrated by the dismissive reaction</p>	<p>Steering group reply – 11th November</p> <p>What we agreed was that whilst everyone present agreed with you, we felt that our existing policies are as strong as possible, whilst</p>	<p>None</p>

BD4 BD5 BD7 CD3 AD6 AD7	<p>from some residents so was determined to feedback even if it's not really that radical.</p> <p>Policies that I think are really important to the local community and identity are (and I would support any strengthening of these specific policies):</p> <p>AH5 - This is more and more a concern after the 4 legion ground floor units got bought and 3 are now holiday lets.</p> <p>AD1 - Definitely agree and think this is essential</p> <p>AD5 - Without this, we lose our identity as a parish...it's rich at the moment so would go even further if possible to restrict any changes.</p> <p>AD8 - Similar to the above point, our vistas are one of the huge elements that makes the parish what it is. If we can't learn from development like pednandrea near warrens and the visual impact that has on the parish, then we're doomed to live in 'just another town'</p> <p>AD11 - I would definitely fully support and encourage any policies that put requirements on developers or even local businesses to contribute or fund woodland and wild nature areas.</p> <p>BD1 - This is very very important and needs to be essential for future developments to use traditional and local materials...cheap granite from overseas is embarrassing. I obviously agree that unique or very modern design should be allowed in the right locations or within the right context.</p> <p>BD4 AND BD5 - New developments and conversion of existing dwellings should absolutely have proportional outside space and parking...it's got to be enforced.</p> <p>BD7 - similar to woodland, the Cornish hedges are key to our identity tying in with the views of the parish. These should be encouraged on any developments.</p> <p>CD3 - As a parish of a small town and villages quite far from the nearest supermarket and town centre, commercial space is absolutely key to keeping residents employed and in the community. I feel extremely strongly about this and I hate the idea of losing any commercial space to residential.</p> <p>The points I'm less bothered about are:</p> <p>AD6 - while I totally think community space is essential, st just in particular has far too many spaces claiming to be community space and none of them are really fit for purpose.</p> <p>AD7 - I think this is much less important given the needs of the community. As towns and settlements develop and grow, it is inevitable they begin to spread and get closer..I think protecting this space is not essential.</p> <p>I might have missed it in there, so apologies if I have, but in the mission to grow the provision of affordable housing, I think similarly new developments that are proposed should have a proportion with a section 106 to prioritize local folk or older residents this would keep their price within reach without having to be shared ownership or housing association.</p>	<p>remaining legal and not being at odds with existing national policies.</p> <p>We have spent months shaping the existing policies, most of them started out being more strongly worded, however they were rejected at assessment for various reasons, such as not being permissive, and for conflicting with things such as planning policies and building regs.</p> <p>Thankyou for your words of support for the policies as they stand. We have been assured that the Town Council will refer to the NHP once it has been ratified and ensure that planning proposals pay due regard and conform to each policy. Town Councillors have seen the plan and have approved it as it stands so they are currently familiar with draft policy, which will be considered as far as possible at this present time. Given that the policies have been shaped by 40% of the community.</p> <p>RE The section 106 clause. New developments must meet local need, however the sticking point with the section 106 clause is that purchasers must provide a 25% deposit. The help to buy scheme does not apply to homes subject of the 106 clause, and there are currently very few lenders willing to provide mortgages to people buying homes subject to the 106 clause. So whilst in theory this clause is a fantastic way to ensure that new developments are allocated to people with a local connection, it remains to be seen whether buying a home subject of a section 106 clause is actually achievable and affordable.</p>	
AH5, AD2 AD3 AD6 AD10(4) BD4(1) BD4(3) BD5(1)	<p>Ref 10/2020 – 9th November - Parishioner</p> <p>1) Firstly please accept my congratulations for producing a thoroughly professional and well researched document. Your team has worked wonders.</p> <p>2) POLICY AH5. I consider that the word "bungalows" should more properly read "single storey dwellings". This would give greater scope for appropriate local design responses.</p> <p>3) POLICY AD2 (3). I suggest that the word "and" be inserted between "findings" and "set out".</p> <p>4) POLICY AD3. I question whether, in the second line, the word "considered" should be replaced by "supported".</p> <p>5) POLICY AD6. This should be made clearer in that it only relates to community facilities which are owned and operated by and for the benefit of the community. Privately owned facilities (such as the W.I.) should not be included in your database.</p> <p>6) POLICY AD10 (4). This subsection does not read well and is unclear.</p> <p>7) POLICY BD4(1). In my view this should refer to "outdoor curtilage space".</p>	<p>Steering group reply – 11th November</p> <p>1) Thankyou, much appreciated.</p> <p>2) Policy AH5 - We will change the wording to "single storey dwelling" as suggested.</p> <p>3) Policy AD2 - We will insert the word and as suggested.</p> <p>4) PolicyAD3 - We are keeping the word considered because even if developers have abided by points 1,2 and 3, there is no guarantee that their proposal will be supported. We agreed that the current wording demonstrates that before a proposal will even be considered, the developer will have had to have satisfied points 1,2 and 3.</p> <p>5) Policy AD6 - This policy was written to include all venues that are currently used by the community, for community purposes and events, of which the W.I is one. The W.I hall is owned by the W.I however it is not owned by an individual person. We wrote to the owners of all community facilities prior to publishing the draft plan, we</p>	<p>Amend policy AH5 & AH2</p> <p>None</p> <p>None</p>

	<p>8) POLICY BD4(3). In line 2 perhaps this could read "...an appropriate screened area in which to store waste....".</p> <p>9 POLICY BD5(1). The wording "an appropriate number" is imprecise and is likely to be challenged.</p>	<p>have not received any negative comments regarding the policy wording.</p> <p>6) Policy AD10(4) - We agreed with your comments and will re-word this section accordingly.</p> <p>7) Policy BD4(1) - We agreed with your suggestion and will change the wording to outdoor curtilage space.</p> <p>8) Policy BD4(3) - We agreed with your comment and will change the wording to "a separate screened area, in which to store waste"</p> <p>9) Policy BD5(1) - We agreed with you and will change the wording to "two parking spaces for homes with 3 or more bedrooms"</p>	<p>Amend policy</p> <p>Amend policy</p> <p>Amend policy</p> <p>Amend policy</p>
<p>AD10</p> <p>AD10(4)</p> <p>BD7</p> <p>AD11</p> <p>AD12</p> <p>BD2(3)</p> <p>DB3</p> <p>BD4(2)</p> <p>BD5(1)</p> <p>BD5(3)</p> <p>RE3</p>	<p>Ref 11/2020 – 11th November - Parishioner</p> <p>Firstly, I would like to recognise all the hard work and perseverance that has clearly gone into this plan. It is a very comprehensive document and my comments below address only a few concerns.</p> <p>Second Homes Page 14, para 3 The growth of second homes and holiday-lets appears not to be seen as a concern in the St Just and Pendeen Neighbourhood Plan. Should we not take the opportunity to learn from other nearby areas where holiday homes and holiday-lets have been increasing for longer and use this information to inform the Plan? Lack of restriction has seriously affected house prices and community viability in many localities; it would seem appropriate to consider how a balance between holiday provision and local need and viability can be achieved before there is a problem, rather than wait to address difficulties when they have arisen. There is no reason to think that the market for holiday homes and holiday-lets will not increase; the terrace of five cottages where I live has two holiday homes already. At least, let us look at restrictions on the purchase of new homes.</p> <p>Biodiversity Policy AD10 Could this be more specific? <ul style="list-style-type: none"> - What level of biodiversity gain should be demonstrated? - What is the length of time in which a biodiversity net gain should be achieved and for which aspects? </p> <p>AD10.4 and BD7 Hedges and stone walls appear rather tacked on and not quite making sense. We need to recognise that a mature/aged tree, hedgerow or stone wall will have a very complex biodiversity, built up over many years. Replacement, even with 'mature' trees will not compensate for a long time.</p> <p>AD11 This focuses on planting trees where there would be 'no harm to the character and appearance of the area'. Such a focus on visual effect is limited; for example, the policy needs to recognise effects on biodiversity and carbon storage as well. Much of the Plan's area is moorland where tree planting would alter soil composition, dry out peat soils, altering their effective water storage properties, and change localised flora. Peat moorland provides effective carbon storage, helps reduce local flooding and has specific flora, these attributes should not be altered by tree planting.</p> <p>AD12 This plan regarding allotments only considers visual impact, which is in the main reversible. The plan should also address the land use regarding longer term matters of biodiversity and carbon storage. Building Construction</p> <p>Policy BD2.3 The provision of EV charging connections for new developments needs to be more specific; it would help to say 'must' instead of 'should' regarding provision of one charger for each new dwelling. It would also be helpful to give a specific</p>	<p>Steering group reply – 20th November</p> <p>Second Homes The team has considered a Primary Residence policy at length. There is a strict evidential requirement to proceed with a PR policy, at the current time there is insufficient evidence to meet the criteria for a PR policy in St Just. We referred the matter to the Town Council and they agreed that at this time they did not wish to pursue a PR policy but undertook to continue to monitor the situation. We have tried to promote development for local residents in our Affordable Housing policies. Biodiversity Policy</p> <p>AD10 Following your comments the group has decided to rework this policy.</p> <p>BD7 The group decided not to amend this policy</p> <p>AD11 This policy may be removed altogether as there is no legal requirement to get permission to plant trees. If the policy does remain we will add a line to cover the impact on biodiversity.</p> <p>AD12 The policy will be amended to include consideration of impact on biodiversity. Building Construction Policy BD2.3 Following your comments there will be some amendments to this policy. Unfortunately, we can't use Must unless it is a statutory requirement</p>	<p>None</p> <p>Amend policy</p> <p>None</p> <p>None</p> <p>Amend policy</p>

	<p>minimum percentage of provision necessary for multi-dwelling developments/car-parks as the word 'sufficient' is not specific and is open to interpretation. It could also be made clear that more generous plans could be looked on more favourably, rather than just accepting a minimum.</p> <p>BD3 Again, the use of 'must' rather than 'should' may be helpful. Outdoor Space – private and communal in housing developments</p> <p>BD4.2 '...as much space as necessary...' can be open to a wide range of interpretations. Stating what amount of space is a minimum or advised and/or what activities it should support may be more helpful, as may stating that developments exceeding this will be looked on more favourably.</p> <p>Traffic and Parking BD5.1 Can you tell me who will be saying what is 'appropriate' parking provision for homes with 3 or more bedrooms? This seems rather vague. What would be considered appropriate?</p> <p>BD5.3 Again, this could this be more specific, with a minimum requirement and an expectation that parking provision will be greater than the minimum.</p> <p>Renewable Energy Policy RE3 It is not clear on Map 11 in Appendix 2 where wind turbines might be sited. If the map is just showing where they cannot be sited, perhaps this could be made clear.</p>	<p>BD3 As above re Must Outdoor Space – private and communal in housing developments</p> <p>BD4.2 Following your comments amendments are being made to this policy. Traffic and Parking Following your comments amendments are being made to this policy to include 2 spaces for houses with 3 or more bedrooms.</p> <p>BD5.3 The group decided not to make any amendments to this policy. Renewable Energy</p> <p>Policy RE3 The map is going to be reviewed to make it clearer. Thanks again for your comments. Once we have made all of the amendments to the plan we have to send it to Cornwall Council who will then conduct a further consultation on the amended document , you will then have a further opportunity to comment on the plan.</p> <p>Parishioner reply Thank you for this, It is encouraging to know feedback is being considered and used. I look forward to the next stage in the NP.</p>	<p>None</p> <p>Amend policy</p> <p>None</p> <p>Amend map</p>
<p>AH4 AH5 AD6 AD11 AD8 BD2 BD4</p>	<p>Ref 12/2020 – 11th November - Parishioner</p> <p>After careful reading, my general support is for AH4 and AH 5 it seems there is the greatest need for AFFORDABLE housing and none for open market building AD6 AD11. Essential in battle against climate change AD8 open vistas are part of human need , during lockdown many folk found them inspiring and therapeutic for mental health</p> <p>BD2 an important element in the climate change battle BD4 it is important for young children to have access to their own safe outdoor space and even if it is not tended, provides a space for nature. It can be a lifeline in the struggle with mental health</p> <p>Any development should only come on the entrances to St Just The traffic congestion is really bad already.</p>	<p>Steering group reply – 18th November</p> <p>The steering group met last night where your representations were discussed. They pass on their thanks to you for contacting them.</p> <p>Your general comments regarding policies AH4,AH5,AD6,AD11,AD8,BD2 & BD4 are agreed with.</p> <p>Here are their thoughts regarding your comments.</p> <p>They felt that your concerns regarding traffic congestion in St Just have been addressed as much as possible in policy BD5(2).</p> <p>Infill development is and will be always the preferred option, rather than development taking place outside settlement boundaries. There are many reasons for this, but predominantly infill development promotes land conservation through the reduction of greenfield development. Infill developments focus on improving neighbourhoods, creating jobs and housing and re-investing in the community. Infill can return vitality to dilapidated areas. Infill development is also a cheaper option for developers, which keeps the cost of purchase down, this is essential in delivering truly affordable housing.</p> <p>The whole team acknowledge the concerns that you have regarding traffic congestion, a section will be added onto Page 51, section 15, of the recommendations that have been reported to the Town Council. This will be inserted as a result of your comments, it will be of great value, so thank you.</p>	<p>Page 51 section 15 amended</p>

		<p>Everyone also agreed that Dark Skies would be a great attraction, however unfortunately this is not something that the neighbourhood plan can influence.</p> <p>It may be worthwhile however, if you wanted to, you could write to the Town Council suggesting that street lighting could be turned off between certain hours of the night ?.</p>	
General	<p>Ref 13/2020 – 12th November - Parishioner</p> <p>I feel strongly that any future housing development in St Just should remain away from the Western (World Heritage Site) side of the town, and be placed on the East side where recent developments have already altered the panorama. This is for three distinct reasons.</p> <p>To minimise all-year traffic through the narrow, essentially single lane and already often very busy residential streets leading to Cape and Cot Valley. Both of these also run past the schools, and any increase of regular traffic here I believe would be disastrous for the quality of life in the village, as well as for reasons of safety for children and residents. Both streets are used heavily by pedestrians and front doors directly open (often without pavements) onto the road. I believe that the Western (World Heritage Site) vista should be preserved at all costs, with its many pathways through the fields to the coast that are heavily used by pedestrians and offer something unique in Penwith, both in panorama and heritage. With only a mile detour into town from the coast path this attracts visitors into the village for stop-overs and for business, often hikers with no carbon footprint or parking needs, via the spectacular, Edwardian vista of terraced houses across working hedgerows and pastures from the Western approach. This is completely irreplaceable. If this is blocked then a great part of St Just's unique character would immediately be lost.</p> <p>For all these reasons I strongly believe that any new housing/building should be on the East side, where it is out of the sightlines of the well-used pathways for hikers/visitors, presents minimum danger for schoolchildren and residents, and causes minimum increase of traffic through the residential areas and many choke-points in the town.</p>	<p>Steering group reply – 20th November</p> <p>Many thanks for your comments about the St Just and Pendeen Neighbourhood Development Plan.</p> <p>You have pointed out that development should only occur where it avoids causing any further traffic issues particularly in the sites you have identified, and that the Western vista of St Just town is of special importance.</p> <p>We trust we have covered these in aspects of the plan.</p> <p>During our housing policy discussions, the decision was made to not allocate specific development sites, but to control proposals via the policies giving the plan greater opportunity to provide affordable and social housing; the opposite of this is that we do not have any identified sites that cannot be developed upon (see page 13, section 28 of the plan document). Reference is made in the plan to many reports including AONB & WHS reports in order to control the development sites:</p> <p>AD2 addresses the impacts of developments within the Conservation Area.</p> <p>AD3 addresses the impacts of developments on heritage assets and their settings.</p> <p>AD4 addresses the World Heritage Site similarly.</p> <p>AD8 addresses panoramas, vistas and views – this policy is currently being re-visited by the NDP team due to your comment and others that have been received. We discussed at length whether we should include specific sights but felt that could put unidentified sights at an additional risk.</p> <p>The whole coastal strip of the parish has additional protection.</p> <p>The traffic and parking issue is unfortunately not within the remit of the plan. However, we included questions in the survey about this topic in order to be able to gauge the level of the problem. This has resulted in BD5 which addresses parking and also addresses the traffic issue. The Community Infrastructure Levy (page 50, section 14) and the Town Council notes (page 51, section 15) both make recommendations including parking and traffic. Following discussions based on your comment the recommendations to the Town Council is currently being re-visited by the NP team to include some input to them regarding traffic issues.</p> <p>We trust this deals with your concerns and are pleased that your input has resulted in actions by the team to improve the plan further.</p> <p>Parishioner reply</p> <p>Wow, that's prompt, and thorough! Thank you.</p>	None
BD3 RE2 RE3	<p>Ref 14/2020 – 14th November – Parishioner</p> <p>Wow what an impressive document! I have enormous respect for all of those involved well done and thank you!</p> <p>Policy BD3</p>	<p>Steering group reply – 20th November</p> <p>You have stressed the importance of energy efficient buildings, and support for renewable energy. Both these topics have involved much discussion within the team, with other external</p>	None

	<p>Unless there are prescriptive benchmarks or standards stated in this policy i doubt whether it means anything other than meeting the current building regulations. I'm sure there are examples of how this is best done, i know that Cornwall Council are themselves grappling with how to do this and the legalities involved. You could ask for calculation of energy use to meet the passivehouse standard or AECB standard. Perhaps it's possible to state a % factor better than current building regulations.</p> <p>This comment also applies to water use.</p> <p>Policies RE2, RE2, RE3</p> <p>There is great local support (that you have evidenced) for the shift to renewable energy generation and community owned schemes. World Heritage Site Status, AONB and even cornwall councils own designations for our area pretty much prevent wind turbine developments. We know that onshore wind is the cheapest and most appropriate form of renewable energy generation, we also know that we are now in a climate emergency (as declared by Cornwall Council) , I therefore suggest that the content of the neighbourhood plan should be much more ambitious in this regard and actually challenge current policy by pushing back hard!</p>	<p>advisory bodies and Cornwall Council for their legalities.</p> <p>BD3 has gone as far as it can legally. We cannot legally insist on any increase on current building regulations. However, we have tried to be non-restrictive in the hope that when building regulations are changed, the NDP will not stand in the way.</p> <p>The renewable energy section has also been written to be as permissive as possible, so that as national regulations change we will not be a limiting factor. The wind energy policy (RE3) required a great deal of persistence over a few months by many of the team to get it past all the required consultant bodies, with many alterations along the way. To summarise, these all go as far as they can at this time.</p> <p>The plan does have a review timescale once it is finally approved, and this will be a topic that will be of import at those stages.</p> <p>Parishioner reply</p> <p>Thanks for explaining. That all makes sense. Good luck with this next stage.</p>	
<p>AH3 AH5 AD2 AD8 BD8 CD1</p>	<p>Ref 15/2020 – 15th November – Parishioner</p> <p>I have read through the Neighbourhood plan and on the whole think it is a good, but there are a few areas that I think could be improved or thought about. Please consider my comments and suggestions for the Neighbourhood Plan. These are meant to be helpful if they're not, please ignore!</p> <p>Affordable Housing</p> <p>On the whole I think we should be only building new houses for local use. I think this is strongly supported by the survey results. (Q93) Unfortunately we weren't given the option on the survey to say only new development for local use, but I believe there is strong support for it. Why isn't this a policy like in St Ives? How is can you be sure it isn't what people want without having asked that specific question?</p> <p>AH3</p> <p>Not happy about building open market housing. This tends to quickly turn into holiday lets and second homes.</p> <p>AH5</p> <p>Would love to see housing specifically for older residents. Warrens site would be perfect for bungalows.</p> <p>Appropriate Development</p> <p>On the whole good - but just a couple of small points.</p> <p>AD2</p> <p>Why not protect all open spaces within conservation areas? Why give developers an 'out' by allowing them to claim open spaces not contributing to the character of the conservation area? These conservation areas are mostly tightly packed rows of miners cottages - let's not pack in new development in amongst already tightly packed housing.</p> <p>AD8</p> <p>Can I suggest the following?</p> <p>From a human perspective, many elements of the landscape are fixed or change very slowly providing a strong sense of place and reassurance, sometimes referred to as being 'timeless'. The distinctiveness and character of a landscape helps define a sense of place at both local and wider levels. All landscapes are part of our national identity, but some project a special sense of 'Cornishness'.</p> <p>The view or vista must be accessible from a public road or public community space – to ensure the inclusion of the majority of residents including pedestrians, horse riders, cyclists and drivers. It is appreciated that many residents enjoy beautiful views and personal views from private residences or</p>	<p>Steering group reply – 22nd November</p> <p>Regarding affordable housing and a principal residence policy. Many discussions have been held regarding these points and much advice sought. At this time, Cornwall Council have produced a document covering the implementation of a Principal Residence Policy; we followed this guidance and could not produce figures at this time to a level where St Just Parish could implement this policy (page 14, section 9.30 & 9.31). However, we accepted the results of Q93 and local knowledge about the issue, and have passed this to the Town Council (page 51, section 15) as a recommendation that they keep this under review.</p> <p>The only way to control the use of a new build property is by the Principal Residence Policy with no other restrictions possible, so would not deal with, for example, housing for older people; however, through the housing section (AH1 – AH6), the phrase "appropriate to the identified local need" has been used to demonstrate that the development would be supported where it is targeting that need. The main push is for affordable housing and this should be achieved particularly by AH3; any development outside of the settlements will be on a rural exception site when AH3 will come into force.</p> <p>AD2 Conservation Areas. A NDP needs to be a permissive document. This means that it is not permissible for the plan to restrict any development, but stress the importance of having due regard to the various required reports including heritage assessments, Cornwall Council conservation appraisal etc... In addition the recommendations to the Town Council (page 51, section 15) include their responsibility to review the community assets and green spaces. BD4 and BD4 cover a requirement for</p>	<p>None</p>

	<p>gardens which are important, however vistas and views that can be enjoyed by the majority of the wider public should be protected. There must be a specific reason for protecting a view or vista, such as an overreaching far view across the countryside or sea, view to an historical or public interest building, a view of a traditional or culturally significant streetscape or a glimpse of these.</p>	<p>outdoor space and for parking facilities, thus limiting “squashing” to a degree.</p> <p>AD8 Panoramas, vistas and views. We have received several comments regarding this policy, and the team is currently undertaking a review of the whole policy in order to improve. Thank you for your thoughts on this.</p> <p>Fake plastic grass. Everyone agrees, but this is outside of our remit. Several suggestions were made as to how this could be dealt with, but none would be printable in an official document.</p> <p>BD8 Reducing Light Pollution. The survey contained questions with regard to this in order to pass onto the Dark Skies Project by Cornwall Council – this has been done and our local County Councillor is involved. This is outside of the remit of the NDP and is under the control of Cornwall Council.</p> <p>Commercial Development. The use of the phrase “Commercial Development” covers all businesses e.g. shops, office space, factory units. A restriction on where these could be sited would not be appropriate. However, all the other policies within the plan would need to be applied to any commercial development, so conservation areas, heritage, bio-diversity etc... would all need to be considered. This will influence the type of commercial development that could occur within the settlements and the country side.</p>	Amend policy
AD8	<p>Ref 16/2020 – 17th November - Parishioner</p> <p>In terms of changes I would like to see to the plan, I would just like to make sure that where new buildings emerge that they don't detract from and obscure the beauty of the old Cornish town and villages in our parish. Let's make sure they are geographically and stylistically separate.</p> <p>In the past building has taken place on very unfortunate sites that dominate the landscape detracting from traditional Cornish architecture and heritage. I am not against new building but feel it should be on sites away from traditional buildings. I would like to see a new, exciting, distinct vernacular develop.</p> <p>To this end I would like to see the policies in the plan that preserve our industrial and domestic Cornish heritage strengthened. You could possibly do this by thinking about what Cornish landscape features should be specially preserved and mention these in specific policies, rather than allowing them to be vague and therefore open to interpretation by planning bodies and developers. For example in vistas and views, could you not be more specific about preserving views of specific Cornish landscape features such as mines, carns, old rows of cottages, seascapes, churches and chapels?</p>	<p>Steering group reply – 18th November</p> <p>The steering group met last night; your comments were discussed. They noted the points that you made in your email, they felt that all of your concerns have been addressed in the policies as they stand. It would not be possible to strengthen them any further and for them to remain as legal policies that are not at odds with existing planning law and building regulations.</p> <p>The group pushed the boundaries of the policy wording as far as possible; several initial submissions were rejected by our neighbourhood plan support officer due to the above issues.</p> <p>Could I please refer you to The Cornwall design guide and The Cornwall local plan, this will illustrate the challenges that we faced whilst writing the policies.</p> <p>We looked again at policy AD8, our panorama, vistas and views policy, the group did not feel that it was appropriate to mention specific tangible things such as churches, chapels mines and carns as they felt that if this list was not exhaustive it could create a loophole that could be exploited by developers.</p> <p>The policy will be slightly reworded to reiterate that such panoramas vistas and views that are referred to in policy AD8 are ones that are enjoyed, appreciated, and valued by the wider public.</p>	Amend policy

<p>AH1 AH2 AH6 AD1 AD3 AD5 AD7 AD8 AD10 AD11 AD12 BD1 BD3 BD4 BD5 BD7 RE3</p>	<p>Ref 17/2020 -19th November – Land agent, on behalf of themselves and their landowner clients.</p> <p>SECTION 9 HOUSING STATEMENT</p> <p>Para 24- reference is made to the target of 1,000 houses in the community network area. However it is accepted by Cornwall Council, that the housing targets contained in the Cornwall local plan (CLP) are minimum targets and should not be used as a mechanism to prevent additional housing development from being approved. The inference from the statement is that there is no need for further housing to be considered in that context.</p> <p>Paras 29-31- there is a lack of evidence to support a principal residence policy in St Just Parish. Furthermore, there is anecdotal evidence in areas where such a policy exists that it is counterproductive. The effect of the policy is to stifle new development, as developers will look elsewhere to maximise their marketing potential, the result of which is that the price of existing house stock tends to rise disproportionately as the policy cannot be applied retrospectively. This results in a double whammy, as fewer new properties come to market and the existing stock becomes ever more expensive. The better approach is to allow market forces to dictate any open market stock, whilst ensuring that adequate provision is made for affordable housing products through larger scale developments and rural exception sites.</p> <p>AFFORDABLE HOUSING AND OTHER HOUSING DEVELOPMENT</p> <p>Policy AH1- should this read “supported” rather than “encouraged”? The former is more definitive than the latter and is more likely to attract proposals.</p> <p>Policy AH2- the basis for this policy is unclear. The wording of the policy differentiates it from policy AH3 but it could be applied to small site proposals for infill or rounding off, under policy 3 of the CLP. There is no policy backing at the higher level for the requirement to “fulfil an identified need” in such cases. Windfall sites are an accepted part of the planning process. At present, schemes of up to 5 dwellings would not attract any affordable housing provision and schemes of up to 10 dwellings would require financial contribution for any units between 6 and 10. At face value, this value is overly prescriptive, and would, in my opinion be open to challenge.</p> <p>Policy AH6- clause 1 of this policy is unclear. Where are the “specific needs” identified ?. In any event this adds an unnecessary layer of prescriptiveness to the provision of windfall housing sites that is neither necessary nor supported in policy 3 of the CLP. Again, in my opinion, this is open to challenge.</p> <p>APPROPRIATE DEVELOPMENT</p> <p>Policy AD1- what is meant by AONB guidance ?. If it is the AONB management plan, then this should be stated to provide clarity for applications and agents, otherwise this leaves this policy open to the comments of the AONB unit on a case by case basis, which applicants and agents cannot predict. The proposed maximum figure of 20 units appears to arbitrary. There is nothing within the explanatory text, other than the figures taken from the household survey, to justify the figure. For example, there is no limit on the site area, so a scheme of 20 larger properties could take up an area that could easily accommodate double that number of smaller units. A scheme of 20 apartments would use significantly less than a scheme of 20 bungalows.</p> <p>What is meant by “development footprint”. If it is the site area, this should be made clear as this term is open to interpretation. If it is the footprint of the existing development within the site, then it is overly prescriptive and has the potential to lead to poor design.</p> <p>Policy AD3- should this read “supported” rather than “considered” ? This implies that the proposal wont be considered at all if the clauses are not met. However, provided that any proposal for planning permission meets the validation requirements, Cornwall council has a duty to consider it.</p> <p>Policy AD5- what is the definition of an historic building for the purposes of this policy ? In the absence of any form of definition, it would be left open to the decision maker to decide</p>	<p>Steering group reply – 25th November</p> <p>The steering group met last night, I have been asked to provide you with feedback that I will list below in the order that you have used.</p> <p>Para 24 - the NDP does not restrict future housing development. It states clearly that there is unmet need and prioritises affordable housing. It does not attempt to restrict the delivery of housing through strategic policies. Para 25 pg 13 refers to unmet need.</p> <p>Para 29-31 - the NDP doesn't impose a principal residence restriction.</p> <p>Policy AH1 - agree, we will re-word the policy accordingly.</p> <p>Policy AH2 - We can't place restrictions on open market housing – and affordable housing requirements will be controlled by strategic Policy 8, which we can't override. So for infill and rounding off sites, affordable housing contributions will be financial contributions for units 6-10 and there will be a target of 30% no sites of more than 10. We can't alter that, our policy is referring to developments which do provide affordable housing, which does reflect local need.</p> <p>Policy AH6 - The specific needs are referred to in point 49 on page 21.</p> <p>Policy AD1 - AONB guidance is just that, it refers to any advice given by the AONB, at any stage during the pre-application and application process. The figure of 20 units has caused much discussion within the group, we have had several members of the community putting forward strong objection to this figure, their feeling is that the limit should be 10. We intend to maintain a ceiling of 20 in the draft plan, this gives flexibility to successfully deliver housing that will fulfil an identified local need, as per the housing needs survey. Development footprint means the area within the site on which the development will take place and includes all ancillary developments for example roads, power lines, boundary walls, paving etc. which require vegetation clearance or which will be disturbed and for which the application has been submitted. This is the legal definition and the one used when writing this policy.</p> <p>Policy AD3 - agree, we will re-word the policy accordingly.</p> <p>Policy AD5 - Cornwall council regularly refer to historic buildings in planning terms, we have replicated their terminology. We refer to WHS in</p>	<p>None</p> <p>None</p> <p>Amend policy</p> <p>None</p> <p>None</p> <p>None</p> <p>Amend policy</p> <p>Amend policy</p>
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	<p>what is or is not an historic building and this leads to uncertainty for applicants and agents. This needs to be carefully explained, otherwise it becomes an arbitrary definition.</p> <p>The term "appropriate fashion" is also unclear, and open to interpretation. No guidance is provided on the extent to which the building might be altered or extended.</p> <p>Outside of conservation areas, there is no duty to preserve or enhance, so clause 3 is overly prescriptive. It need only not cause significant harm.</p> <p>Policy AD7- the existing settlement boundaries have no previous basis in planning policy. At no point have settlement boundaries been drawn for the town, villages and hamlets within the parish and to do so now is disingenuous. Despite earlier consultation with us and our response to concerns over this, areas that we had been advised would be shown as within the settlements remain excluded, despite the fact that extant planning permission exists in some cases. If settlement boundaries, however nominal, are to be shown, these amendments should be shown.</p> <p>Whilst the principle of keeping the identities of settlements independent of one another is supported, the inclusion of nominal settlement boundaries and stating that the areas between there are sacrosanct precludes the development of sites that would otherwise be seen as infill or rounding off and, indeed rural exception sites. The plans previously submitted for consultation showing the important gaps are no longer included in this draft document, so the inference is that the policy will apply to all undeveloped land outside the nominal settlement boundaries. That opens up a number of potential other issues of concern to some of my clients and clarity on this point is, therefore required.</p> <p>We were also advised that this policy would not preclude agricultural development, which is normally located away from settlements (indeed, it is often desirable for it to be so) but no exception is made in this regard.</p> <p>In the absence of plans showing the areas that are genuinely important to retain the gaps between settlements within the NDP, this policy is lacking in definition and is open to challenge.</p> <p>The original consultation on this point led us to challenge certain areas that had been identified as being important as part of the gaps, but no clarification has been provided as part of the consultation draft. If anything, the level of information is now reduced, in addition the lack of clarity caused by the absence of any plans showing the location of the important gaps within the document itself. Therefore we would want the opportunity to comment further on the plans that are intended to form part of the NDP.</p> <p>Policy AD8 – no list of panoramas, vistas and views is provided, so, again, these are all open to interpretation. If there is no specific list, then the character of the AONB is protected under policy 23 of the CLP and this policy is unnecessary.</p> <p>Policy AD10 – the requirements of this policy do not prescribe the level and/or location of development to which it applies. It cannot be applied to every proposal for development as there are cases where it is unnecessary. In addition, biodiversity net gain is not required on smaller scale developments, so the policy should be clarified to confirm that this requirement only applies to major developments, otherwise it is overly prescriptive.</p> <p>Policy AD11 – whilst there is no objection to this proposal, it seems unnecessary, given that the planting of trees, per se, does not require planning permission.</p> <p>Policy AD12 – again this policy appears to be unnecessary. The use of land for allotments does not require planning permission as that use falls under agriculture, which is excluded from the definition of development in the Town and Country planning act 1990 (as amended). This policy would be better directed as development associated with allotments, e.g sheds.</p> <p>BUILDING DESIGN AND OUTDOOR SPACE</p> <p>Policy BD1 – clauses 4 and 5 appear to be incompatible. On the one hand, contemporary design is encouraged, but this is</p>	<p>the "why this policy" section, if the building is within the WHS then it will contribute to the OUV and will be deemed to be a designated asset of the highest importance. We will amend the policy to add listed building.</p> <p>Policy AD7 - settlement boundaries was perhaps not the best descriptive for the maps so we have changed their descriptive to "existing settlement extents"</p> <p>We have also re-worded the policy accordingly, which we hope will go some way to addressing your concerns.</p> <p>We decided not to include the green gaps maps from the draft policy, that you refer to. Instead we re-worded the policy to remove the necessity for including the maps.</p> <p>The NDP does not preclude agricultural development, this development is subject of permitted development.</p> <p>Policy AD8 - this policy has been discussed at length by the team, we have slightly amended the policy wording, however we have decided not to list specific panoramas, vistas and views as we felt that there were too many to list. We expect that this is something that the independent assessor may have an input on.</p> <p>Policy AD10 - We have re-worded this policy and are satisfied that CC will be supportive. They are moving towards a requirement for Biodiversity Net gain on minor as well as major planning proposals.</p> <p>https://www.cornwall.gov.uk/environment-and-planning/planning/planning-policy/adopted-plans/planning-policy-guidance/biodiversity-net-gain/</p> <p>Policy AD11 - agree, we will re-word the policy accordingly.</p> <p>Policy AD12 - agree, we will re-word the policy accordingly.</p> <p>Policy BD1 - BD1(4) encourages design flair, we will re-word policy BD1(5) accordingly.</p>	<p>Amend policy</p> <p>None</p> <p>Amend policy</p> <p>Amend policy</p> <p>Amend policy</p>
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	<p>then tempered by the need to match the proportions of local vernacular buildings, thus stifling design flair.</p> <p>Policy BD3 – in clause 2, does “new development” mean new build development. If so, it should be clarified; if not, it is likely that there will be cases where this requirement cannot be met.</p> <p>Policy BD4 – the same point applies here. There are occasions where conversions, for example, involve buildings that either do not have, or have limited amenity, or other space, yet their conversion to residential use is justified to preserve the building in the long term or under general sustainability provisions.</p> <p>Policy BD5 – the same point applies here.</p> <p>Policy BD7 – the blanket requirement to provide net biodiversity gain in these circumstances is overly prescriptive and should only apply to major schemes.</p> <p>RENEWABLE ENERGY</p> <p>Policy RE3 – Map 11 shows the entire parish and the designations within it. There does not appear to be anything within the key to suggest that wind turbine development is precluded from any part of this, is this correct?.</p>	<p>Policy BD3 - This policy refers to new buildings, replacement buildings, and conversions. If a developer absolutely cannot meet the target of 20% that will have to be evidenced and presented to CC, we feel that the target is reasonable and achievable.</p> <p>Policy BD4(1&2) - agree, we will re-word the policy accordingly.</p> <p>Policy BD5 - agree, we will re-word the policy accordingly.</p> <p>Policy BD7 - see AD10</p> <p>Policy RE3 - agree, we will amend the map accordingly.</p> <p>We hope that our feedback does go some way to satisfying your views. Once again, thankyou for providing us with your representations, we have listened to you and have made improvements as a result.</p>	<p>None</p> <p>Amend policy</p> <p>Amend policy</p> <p>None</p> <p>Re-work map</p>
RE3	<p>Ref 18/2020 – Parishioner</p> <p>We would strongly object to any wind turbines being sited in or near this area.</p>	<p>Steering group reply – 25th November</p> <p>I'm afraid that we have to have a permissive policy for wind turbines, we have to have policies that support the wishes of the wider community. I can assure you that Policy RE3 whilst permissive will respect existing land designations and will only support installations of a suitable scale. Once again, thankyou for sharing your representations.</p>	None
BD8	<p>Ref 19/2020 – Parishioner</p> <p>1) It is an excellent and thoroughly professional piece of work which all involved should be commended for.</p> <p>2) Policy BD8 mentions external lighting. We feel it would be beneficial to include details on turning off selected street lighting at certain times. Living on Pleasant Terrace which has street lighting on a footpath, this is not really necessary after 11pm due to nil footfall and affects both dark skies initiative and light pollution.</p> <p>3) There is limited detail within the plan on "Assets of Community Value" We feel that more emphasis should be placed on nominations of this status as change of use of community spaces have the potential to change the character of the town and its community drastically. Should there be a direct policy about Assets of Community Value?</p>	<p>Steering group reply – 26th November</p> <p>The steering group feedback is as follows. Policy BD8 is as prescriptive as it can be legally, we do appreciate your position however street lighting is not something that the NHP can impact upon. It may be worth making a complaint to Cornwall Council, I believe that you can ask Cornwall Council to dim street lighting or fit something to the light to angle the glare away, their number is 03001234222. We don't currently have any assets of community value registered, we have referred this to the Town Council as this falls within their remit. I am sorry that we have been unable to influence any of your suggestions, however the NHP is limited strictly on things that it can and cannot influence.</p>	<p>None</p> <p>None</p>
Multiple policies	<p>Ref 20/2020 – Parishioner – 22nd November</p> <p>To whom it might concern,</p> <p>I would like to commend the hard work put into the plan. To have generated such a document covering so many areas, has clearly taken a significant amount of work and I want to pay tribute to all the volunteers involved.</p> <p>I would particularly like to support much of what is written under strategic objective 3 – Building Design and Outdoor space. The policies here are clear, specific and show a good balance between conservation needs and the needs of the community to change or develop new buildings that are environmentally friendly and respect the local area.</p>	<p>Steering Group reply – 26th November</p> <p>The steering group met on Tuesday, where they discussed public comments. They have asked me to forward you their feedback on your representations.</p> <p>Wind Turbines - Agreed, the map is currently being re-worked.</p>	<p>Rework map</p>

	<p>The above said, I have a number of significant concerns with the Neighbourhood plan as it stands.</p> <p>Winds turbine sites</p> <p>I support the thrust of the plan in supporting renewable energy but the map is unclear as to where wind turbines will be permitted and public understanding would be greatly improved if it was clearer rather than a rather complex set of layers relating to various other designations.</p> <p>Identification of housing sites</p> <p>Given in the neighbourhood plan questionnaire 72% of people thought "Development sites should be allocated within preferred development zones identified by this process (Neighbourhood Development Plan)" to have not identified any sites through the plan does nothing to address the challenges and barriers allocating new housing sites currently face and so bring forward housing to meet the identified need.</p> <p>Identifying areas wouldn't preclude them falling under rural exception site rules, but it would allow the community to have clear agreed areas where development could take place, it would allow discussion and debate related to the plan rather than in relation to each individual development subsequently.</p> <p>All too often people say they recognise the need for affordable housing, just not in my back yard. The whole point about the plan is to thrash out where is appropriate and acceptable to the majority.</p> <p>The neighbourhood plans current position of shying away from this means that each individual development of housing will have to struggle through local objections to 'development in principle' to any individual site, rather than be able to work with the local community to ensure the size, shape, features of the development are appropriate. This will prevent developers and lead to a lack of provision to meet the need identified, leaving the poorest and most needy in the community to suffer.</p> <p>The neighbourhood plan not listening to this key element of the public response to the survey, and not taking any notice of the sites that the public highlighted, is disingenuous to the community and seems to show a disregard to what people clearly wanted and asked for.</p> <p>Essentially the neighbourhood plan is maintaining the existing status quo rather than doing anything to address housing need.</p> <p>Given its almost unheard of for more than 50% of any rural exception site being developed as affordable without massive grant, (and given the economic outlook is likely to lead to a massive reduction in grant availability), based on the plans own figures there would need to be 10+ sites identified. I think the plan needs to revisit this as a matter of priority.</p> <p>I would also like the plan to clarify what it means in Policy AH1 when it talks about encouraging different routes to affordable housing.</p> <p>While I am really supportive of Community led Housing projects, in paragraph 39 the assertion that Community led housing will lead to the delivery of the highest proportion of affordable housing is without any evidence. Over the past decade there has been a tiny handful of units delivered through Community led housing developments, and throughout the parish over 97% of all affordable housing has</p>	<p>Identification of housing sites - The plan is wholly supportive of affordable housing, the reasons for not identifying potential sites for development are outlined in the links below.</p> <p>Identifying development sites causes the land value to increase dramatically, deciding who should profit financially and who should not was something that the steering group was not prepared to do.</p> <p>https://www.stjustandpendeen-np.org.uk/stjnp/wp-content/uploads/2019/11/NP-Household-Survey-Map-Interpretation-Report-agreed-28-October-2019-final.pdf</p> <p>https://www.stjustandpendeen-np.org.uk/stjnp/wp-content/uploads/2019/10/St-Just-Pendeen-NP-Steering-Group-decision-on-development-sites-28-Oct-2019.pdf</p>	<p>None</p>
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	<p>either been via the local authority, housing associations or public/private ventures, so while this aspiration seems admirable it doesn't seem grounded in any local evidence. It's also not clear how this policy will actually bring forward development. The truth is scale housing developments need significant financial investment, so if the plan is committed to meeting the local need within the lifecycle of the plan, it will need to look beyond just this approach – recognising community led development as part of the mix, but not the only route.</p> <p>Policy AH4 doesn't seem to give any scope for individuals or families looking at self-build, this could be easily addressed through including reference to local families, particularly given the community was more inclined for individual or small scale developments.</p> <p>Increasing density The settlement lines seem excessively tight and seem to not encourage appropriate development outside of existing property boundaries in any form i.e. (shown in green on image below but this is not a single instance) This approach also seems to show a lack of any strategic vision of growth. By doing this it suggests that the intention is either to prevent all development or to at least create a hostile environment towards development. The plan can not be anti-development both explicitly and implicitly. I strongly believe the settlement boundaries should at least identify some potential for development that isn't within existing residential property boundaries, after which the community can comment and decide on a meaningful local plan. The net effect of not addressing the above points is that existing houses will have new housing built in gardens, eroding the character of the existing dwellings and community and creating increased density in towns (surely the lesson of covid is that that isn't a good thing!). A lack of specifically local policies and general vagueness. The issue of a lack of development sites is further compounded by a number of very generic and unspecific policies in relation to affordable housing. Much of the affordable housing section seem simply to be a restatement of what already exists within national and Cornwall planning policies, as such there is a question as to what additional value there is in their inclusion within the plan. Is it just tokenism? If the plan really wanted to address housing issues it should be speaking to those in poor housing and coming up with a specific local plan. How areas where there is clear intelligence that housing is of a poor quality, could have regeneration supported through the provision of adjacent development sites. Throw away, but ultimately meaningless phrases, within policies (i.e. AH6 – “are suitable for full time occupation”) need to be substantiated in order that they preserve new residential properties for full time occupation rather than simply serving as holiday lets. I also have real issues with AD8 - given what constitutes a panorama, vista or view is so subjective as to make this a meaningless policy.</p>	<p>Policy AH4(1)- agreed the policy will be amended.</p> <p>Increasing Density - The settlement extents maps exist to promote rural exception sites. The community very firmly demonstrated their wish to protect green spaces between hamlets in the household survey.</p> <p>Policy AH6(2)- Ensures that new build developments are not designed specifically to be holiday lets. .</p>	<p>Amend policy</p> <p>None</p> <p>None</p>
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	<p>Given the whole parish sits under some form of designation, CD1.3 seems to be designed to prevent anything anywhere, specific features of value should be identified and marked so the public can have a view as to whether they agree on their relative importance.</p> <p>It appears that much of the unspecific nature of policies is to prevent public debate and scrutiny, but by so doing undermines the value of the plan.</p> <p>Principle residence policy</p> <p>Second homes are a real issue in the parish and I do not agree that policy couldn't be developed. There has been a lack of will and barriers have been presented by those volunteers who were keen to pursue this area (such as an unwillingness to use things like the Neighbourhood Plan's facebook to further explore this issue with the local community). Primary residency must and should be included. Such a policy relates to new properties only so in no way alters the relationship with those already using properties as second homes or holiday lets, and there is a very strong public mandate for this shown through the survey. There is also very strong evidence that a significant proportion of residential properties developed over the past 10 years are not used as a primary residence. The parish doesn't have the same issues as areas like St Ives, in that demand within the parish is not limited to a small area around a harbour or sea front. If there was development to meet local needs, and it was safeguarded as such, then this would offset any increased demand for existing properties. This is such an important consideration for young people and families who are being edged out of local living. We risk the parish becoming a preserve of the elderly or wealthy and safeguards must be put in place to ensure that development meets all local needs.</p> <p>As the plan notes not all new housing will be affordable, so a principle residence policy is vitally needed and has very clear public support. If those currently involved in the plan are unwilling to pursue this matter then I believe they should allow others to take up the mantle but should not block its inclusion in the plan.</p> <p>A lack of genuine engagement of the community</p> <p>Given the excellent start to the neighbourhood plan, which really engaged and encouraged public debate on the issues, the plan seems to have presented a long and complex document without any attempt to engage the public on the issues raised, aid their understanding and allow public debate, so that the plan can truly be seen to reflect the views of public.</p> <p>Sadly, my impression is that since the survey (which was after all highly subjective and questions were open to interpretation), development of the plan has been behind closed doors. This has led to a somewhat selective interpretation by a very small group of people and some major omissions.</p> <p>While mindful that there are constraints due to Covid-19, other than presenting this complex document, there has been no attempt to explore issues with the public, or opportunity for open public debate (people even being encouraged not to comment on Neighbourhood Plan facebook posts). There has been no on-line sessions to help explain issues, which could and still should be undertaken.</p>	<p>P.R.P - As you may be aware, the Town Council (not the steering group) made the ultimate decision not to have a PRP in the plan.</p> <p>Community Consultation - The strategy document that evidences each step of the consultation process, from the outset, will be presented to the overseers of the process, they will decide if the steering group has effectively consulted. The plan has been written by using the results of the household survey. Every household received a hand delivered copy, and 39% of the community completed it. This is an unprecedented result that the steering group has been praised for.</p> <p>The regulation 14 consultation has also been a success, many members of the community have sent in their representations, we have listened, and responded meaningfully to everyone, as a result dozens of amendments have been made to the plan. The amendments will be available to view at the Regulation 16 consultation. We hope that our reply has gone some way to addressing your views.</p>	<p>None</p>
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	<p>This all leads to a feeling the plan is being presented as a fait accompli, this suggestion is supported by the fact that the process set out in the plan shows no redrafting following this consultation.</p> <p>The community feels detached from the plan and presenting a huge complex document with no opportunity for public discussion shows either a lack of confidence in what is written or a contempt for public opinion.</p> <p>It is imperative that moving forwards there is much greater engagement and transparency, and that feedback during this consultation is openly shared in its raw format so people can see exactly how many people have responded and in what ways, this would then allow people to also see how it is taken on board and have their confidence restored.</p> <p>It is for the above reasons that I believe the plan needs significant reworking.</p>		
Multiple policies	<p>Ref 21/2020 – Parishioner – 22nd November</p> <p>Firstly I would like to thank the committee for all the hard work that has gone into drawing up this draft of the St Just and Pendeen Neighbourhood Development Plan.</p> <p>Whilst tackling such an extensive subject it is inevitable and natural that some significant issues and concerns seem to have fallen through the cracks whilst the attention of the committee appears to have been more focused on other areas of the plan. As a member of the parish I am therefore very grateful to have been offered the opportunity to bring these neglected areas back in to focus again. As it is so important that all areas of the plan are seen to hold equal positions of prerogative.</p> <p>Page 16 Point 11 Vision, Aims and Objectives</p> <p>35. Vision.</p> <p>The four main points outlining this vision are a clear example of the unequal level of intent that sometimes is shown throughout the plan. Three of the points are written in a manner showing a strong and clear level of intent that leaves no room for misinterpretation. However point three is written in a very brief and vague manner, leaving much of the point open to misinterpretation.</p> <p>Below I have written out a draft example of a more positive and clear approach to this point:</p> <p>Protect and preserve the unique heritage of St Just town and all the parish settlements and the surrounding countryside; working closely with all its Heritage Partners to recognise the important position it holds in maintaining this unique historical and natural environment in perpetuity.</p> <p>Page 7 Point 7 Settings</p> <p>I was very surprised by the start of this statement, as the unprofessional and derisory nature of this first comment is unnecessary and very unhelpful creating a very bad impression about the intent for the rest of the plan. It really shouldn't be included in this document as it is also inaccurate and shortsighted. (if we are trading quotes I can only respond with: don't kill the goose that lays the golden egg).</p> <p>As I have previously mentioned it is so important that all the different areas concerned should be seen to work together equally, to create a clear and sustainable vision for the future. St Just and the surrounding parish are no longer providers of</p>	<p>Steering group reply – 26th November</p> <p>Page 16 point11 - Thankyou for suggesting a re-word, we discussed it and have decided that we are happy with the original wording, we thought your suggestion was a preclusion to potential development.</p> <p>Page 7 point 7 - Agree, this section is being amended.</p>	<p>None</p> <p>Amend policy</p>

	<p>large scale industry. In fact the last remaining employer of any significance Warrens Bakery has recently closed its factory and moved it further up the county. Entrepreneurial and lateral thinking is required at this point and the importance of this areas heritage, which is even recognised on the world stage, must be explored as one of the most significant areas that can help to carry the community through to a sustainable future. It is important to preserve an equitable balance between these two areas of concern. There is a clear argument that this plan should designate the introduction of carefully located and specifically defined areas: places suitable for contained development, and other areas to be protected and preserved. Thus ruling out piecemeal development leading to erosion by stealth.</p> <p>page 9 & 10 Point 7 Consulting our Community 15</p> <p>This point contains a very comprehensive list of all the major Heritage Organisations that have an active profile in the area. It is mentioned that the committee had meetings with these organisations "to gather information and hear their views about what would help or hinder their aims". But there is no mention of any aspiration for the plan to recommend that in the future a close working relationship should be formed with these Heritage organisations, and in some cases even a partnership. Such close links with the heritage sector could provide a vital working and financial resource for the parish; as they are run by professional teams with all the many and varied talents and experience needed to maintain this very important area: including planning and conservation skills, and financial resources to help with raising grants from within this country and also on the world stage. So it clearly would be advisable that these Heritage Organisations should be included in the plan both as advisors for the plan, and as active participants and enablers to carry the plan forward.</p> <p>Page 23 Strategic Objective2</p> <p>Page 24 Appropriate Development</p> <p>Page 24 AD2 Conservation Areas</p> <p>Page 24 AD3 Heritage impact</p> <p>Page25 AD4 World Heritage Sites</p> <p>Page 27 AD7 Open Spaces between Settlements</p> <p>Page28 AD8 Panoramas Vistas and Views</p> <p>Page 29 AD10 Biodiversity</p> <p>I have covered all the above under a combined generic heading.</p> <p>I have heard from other members of the public that the committee won't consider points raised if they are not defined from within the published plan.</p> <p>As I have previously mentioned that the subjects of Heritage, Landscape and Biodiversity are mentioned in passing throughout the plan. To make my points more succinct I have covered them again at this point where they appear most significantly under the inclusive heading Policies for Appropriate Development.</p> <p>I have also been advised that the committee won't consider points that are made if they are about a specific named place within the parish. This decision makes it very difficult to succinctly discuss all the points within the above subject areas. Any points made would be much more pertinent if specific examples could be given.</p> <p>I would like to note at this point that the Neighbourhood</p>	<p>Policy AD1 recommends a ceiling of 20 houses per development site, and prohibits further aggregate development in adjacent sites.</p> <p>Pages 9 & 10 point 7 - This is a great idea in theory, however the reality is that organisations such as the ones you mention have an extremely limited capacity. We are unable to insist that these alliances are formed, however our policies have gone as far as possible to suggest that developers consult with them. This is possibly something that you could consider suggesting to the town council.</p> <p>A.D policies - The steering group have debated whether or not to include specific examples in policy AD8, the decision is not to at present, as there are numerous examples within the parish, omissions could render a specific place vulnerable to development.</p> <p>The coastal strip has a number of protection designations such as SSSI, AONB, Heritage coast, policy AD7 has been reworded, however the thrust is designed to also prevent the coalescence of settlements. This policy also considers that conservation areas have significant value. Policy AD2 also considers conservation areas.</p>	<p>None</p> <p>None</p> <p>None</p>
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	<p>Development Plans drawn up by other parishes in Cornwall (these can be seen on the Cornwall County Council website) have happily accepted site specific examples, some even including photographs.</p> <p>When writing my comments on the plan I have referred to the parish and St Just town maps (which can also be found on the CCC website) as these are very clear and it is easy to identify all the various boundaries both local and heritage. On the other hand I have found that the St Just town map published within the Neighbourhood Plan is often muddled with some boundaries hard to distinguish between each other or unclear, and at points quite difficult to interpret. Also at times it doesn't seem to match the equivalent map shown on the CCC website.</p> <p>For an important document like this it is vital that the most up to date and therefore the most accurate documentation is used. Could you please let me know who produced and published the map you have used and also the first date it was published. I strongly recommend you improve the accuracy and quality of the map used in the final document.</p> <p>More detailed areas of concern:</p> <p>AD4 The plan must firmly acknowledge the extremely significant Heritage of St Just town and its surrounding parish, this would be helped by a more proactive approach to the inclusion of and partnerships with, all the many and various heritage sites and organisations noted in the plan. AD3.and</p> <p>AD4. The Neighbourhood Heritage Plan shouldn't just be concerned with the present and the past, but like all its more socially based statements it should also be about the future discovering even more areas that can be included; expanding our understanding of the past and preserving it for future generations.</p> <p>AD2.AD3.AD4&AD7. A very strong argument about the erosion of distinct settlements and conservation boundaries by piecemeal development has been made in AD7. The relationship of the St Just town boundary with its immediate surrounding countryside isn't covered within this point - yet as the main settlement within the parish I would suggest that it is vital to include it as an area for special attention within the plan.</p> <p>The town boundaries to the north have a brief mention, but the boundaries on the other side that link to the Heritage Coastline have been ignored. This area contains some of the last few remaining defined historically important boundaries of the original St Just settlement forming a very clearly defined break where the town meets the green Heritage sites of the surrounding landscape:</p> <p>Where the original street patterns of the miners cottages meet the open and once public green spaces of the past, which still contain all the now hidden archeology of their previous history and use. These once open public spaces then seamlessly lead on to agricultural land still set out in their original medieval field patterns, and then beyond to the more barren landscape of the tin mining heritage together with the magnificent vistas of the heritage coastline. This distinct green corridor between town boundary and the sea still holds within it all these varying layers which reveal the unique mix of social, industrial, and natural heritage, which in turn are now the clear markers for all the many and various heritage sites which have become so</p>	
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	<p>valued throughout the world.</p> <p>So although AD7 was originally written to safe guard the distinct areas between outlying settlements thus preserving their unique nature and sense of place, all the points raised in it are also totally relevant to safeguarding all the distinct areas between the original St Just town boundaries and it's green corridor, and then on to the Heritage Coastline. It is therefore just as important to state for the St Just town boundaries and its green corridor that "any proposals for development in this area will not be supported".</p> <p>AD8. This green corridor between the original St Just town boundary and the Heritage Coastline is also very significant when considering all implications within policy AD8 Panoramas, Vistas and Views.</p> <p>The very special and diverse visual character of this area of the landscape must be preserved at all costs. The vistas and views from the town to these heritage sites must be preserved untouched for the future. It must also be remembered that they are just as important to the sense of place when viewed the other way round looking at the town scape from the coastal and other heritage sites. As in Policy AD7 the wording needs to be far more direct; stating that no interference or change would be supported.</p> <p>AD10. The St Just town green corridor and its defining layers is also vital for the protection of local flora and fauna with each layer containing its own different and unique biodiversity of plant and wildlife habitats.</p> <p>Finally I would be very grateful if you could tell me if all the comments from the St Just residents about the Neighbourhood Plan and the committees subsequent replies are being kept as a record that will be available to be published if required.</p> <p>I hope that you will find all the above comments helpful.</p>	<p>AD8 - The steer when embarking on writing a NHP, is that the plan has got to be permissive, so it would not be possible to strengthen the wording in the draft policies any more than they currently are.</p> <p>AD10 - Agreed, this policy has been re-written, the amendments will all be available to view during the regulation 16 consultation.</p> <p>All public comments (minus personal details) and steering group replies have been recorded and collated onto two documents, a full version and an edited version. The steering group have made many amendments as a result of the public consultation.</p> <p>All documents will be published at the regulation 16 stage of this process.</p>	<p>None</p> <p>Amend policy</p>
General comments	<p>Ref 22/2020 – 23rd November – Parishioner</p> <p>We're sorry we haven't had time to compile a detailed response to the consultation, but wanted to say that we are very impressed by all the work which has gone into this and we are confident that your findings reflect last year's survey.</p> <p>We are pleased to see an emphasis on affordable homes for local people. We wish there was a way of preventing properties, both old and new, from becoming second homes or holiday lets, but we're aware that this is beyond the remit of this Plan.</p> <p>We also hope that there will be protection of the coastal fringe against development, with any new developments being further inland, given the unique landscape of our coastal areas.</p>	<p>Steering group reply – 23rd November</p> <p>Thankyou for your kind comments and for your support.</p> <p>I can confirm that our coastline is defined as a heritage coast. The coastal strip is designated as a site of special scientific interest adjoined by special protection areas.</p> <p>There are many other designations on the coastline which will also afford the protection against development on the coastal strip.</p> <p>I hope that this goes some way to providing reassurance.</p>	None
	<p>Ref 23/2020 – 23rd November-Parishioner</p> <p>Dear Neighbourhood Development Plan Steering Group and Community Volunteers</p> <p>I'd like to begin by recording my thanks and appreciation of all the extensive and hard work that has been carried out by community volunteers and everyone involved in planning, researching, consulting, collating and preparing the draft plan. This is an excellent document and you should be proud of the work you have carried out on behalf of the local community, St Just Town Council and Cornwall Council.</p> <p>I sincerely hope that this document will be used actively by any interested parties to ensure sensitive development and conservation takes place in future within this unique and very special area of West Cornwall. I also hope that the document</p>	<p>Steering group reply – 25th November</p> <p>Please find below the feedback to your representations, once again, thankyou for taking the time to read and comment on the draft plan.</p>	

	<p>will be reviewed and updated regularly in future to ensure it remains a relevant and active, up-to-date tool and to ensure that it does not become simply another archive reference document.</p> <p>Policy AD1 26% of residents in the 2019 Housing Survey favoured up to 5 houses only, 25% up to 10 houses only. Added together this makes 51% of respondents favouring developments no greater than 10 units. accordingly this should be the figure in the policy. It is erroneous to state that because 34% of respondents considered up to 20 units acceptable this should be the agreed maximum number of units in a proposed development. It seems pretty clear to me from the evidence of the responses in the 2019 Housing Survey that the stated maximum number of units in this policy should be no greater than 10.</p> <p>Policy AD10 Point 3 - In commissioning a wildlife survey there should be a requirement that this should only be carried out by a professionally qualified and experienced ecologist.</p> <p>Section 16 - Implementation, Monitoring and Review It is good to see this specific section within the Neighbourhood Development Plan. In order to provide an objective framework and criteria for measuring the effectiveness of the NDP, I suggest that the Town Council's sub-committee charged with this work spend some time ensuring that there is a clear baseline position from which to measure future progress against and develop key relevant performance indicators to evidence this. One area that should be considered is the extent to which Cornwall Council planning staff regularly use the NDP to improve the quality of planning consultations and applications. I would suggest that there should be a clear requirement to submit relevant impact assessments and surveys to achieve the improvement of the quality of planning applications by prospective applicants and agents. An excellent starting point and opportunity would be at the pre-planning application stage to ensure that all relevant parties are clear, from the outset, of the unique and special quality of the local environment in St Just-in-Penwith. it may be worth considering citing 'exemplar' developments, of varying scales, where clear use of the relevant NDP policies has resulted in sensitive, high-quality development and conservation outcomes which balance and meet the needs and aspirations of the local community and stakeholders.</p>	<p>Policy AD1 - We sought advice on policy AD1 and received the advice to leave the ceiling at 20, this allows for flexibility to deliver housing that will fulfill an identified local need, as per the housing needs survey. Limiting the ceiling to 10 may result in multiple developments of 10 houses around the parish, and it could very well attract a legal challenge from the affordable housing team, because limiting the size of developments like this will affect viability and may reduce the percentage of affordable housing units delivered on sites. We are confident that there are other policies in the NDP, and in the Local Plan and NPPF that will operate with this policy and limit many sites to 10 units or fewer in particular cases. This will be especially carefully regulated in the AONB, where 'proposals must conserve and enhance the landscape character and natural beauty of the AONB.'</p> <p>I know that this is not what you want to hear and I apologise for that. We are caught between a rock and a hard place with this policy and it will be impossible to please everyone, however all is not lost. There is a further consultation stage, Regulation 16 'Publication' consultation, which Cornwall Council has to hold after we submit the documents. This specifically enables people to check whether we have made changes as a result of comments received at Regulation 14. So, just as Affordable Housing may comment if we do lower the limit, you will also be able to comment again at Regulation 16 if you are not satisfied with our explanation, your comments will be considered by the Examiner as part of the Examination. We do all wish you well with this, our decision has been made with the community at large in mind, it does not necessarily represent our personal views.</p> <p>Policy AD10 - unfortunately we cannot enforce your suggestion legally within the policy. I should add that this entire policy has been re-written with a stronger emphasis on biodiversity.</p> <p>Section 16 - Implementation, monitoring and review of the NHP will be the responsibility of the Town Council.</p> <p>I hope that this reply will go some way to addressing your representations.</p>	<p>None</p> <p>None</p> <p>None</p>
	<p>Ref 24/2020 – 23rd November - Parishioner</p> <p>Firstly, thanks to all involved in this process and producing the plan. Having grown up in mid Cornwall (in an area where I could never have afforded to buy a property) I am saddened by the scale of approved developments I see there which are inappropriate, of poor quality and don't meet local needs. I've gradually moved westwards and have now lived in Pendeen for three years. In comparison I see that it's largely retained its local character, and has such an incredible natural and historic landscape to protect. I really hope that this Plan does influence the future development of this area in a sympathetic and sustainable way. Just spotted a couple of minor errors: p29, policy AD10 - point 5 needs re-jigging I think. p30, point 71. ERRCIS should read ERCCIS.</p>	<p>Steering group reply 24th November</p> <p>thankyou for taking the time to read the draft plan and emailing your comments. Thankyou for your support of the plan too, we also are really hopeful that the policies that we have written will influence sympathetic and sustainable development. Re policy AD10, you are not the only person to suggest it needs to be re-jigged, we have re-written the whole policy. Also thankyou for pointing out our error with ERCCIS, we hadn't spotted that so it's a good job you did !. Again thankyou.</p>	<p>Amend policy</p> <p>Correct typos</p>

	Ref 25/2020 – 22 nd November – Parishioner	Steering group reply – 26th November	
	<p>I am impressed that you have been able to produce a plan, putting the lumbering Penzance Neighbourhood Plan into the shade. However, the plan seems a little light in content. It would be good to see the distinctive, innovative parts on the plan drawn out, if only to generate enthusiasm in the coming referendum. At present much of the plan seems simply to restate Cornwall council policies, and does little to advance them. Conventionally, there are 2 parts to a plan, the vision, with a practical program for its future implementation, expressed in a Development Plan, and its implementation through development control policies -the second part. It seems that the present Neighbourhood Plan is almost solely based on control policies. Perhaps ambition was discouraged by Cornwall council. I suggest at this late stage we might incorporate 'community aspirations' so that people can see in what direction the neighbourhood plan is going. Looking at other small town, perhaps more adventurous plans, e.g. Saint Ives, Frome, Totnes, Rye these have Incorporated 'future vision'.</p> <p>Building the Saint Just and Pendeen Neighbourhood Plan around the general opinion survey carried out is difficult given there was nothing to react to, little explanation of issues or even a general knowledge of the possibilities as well as the limitations of land use planning. I wrote to you on this subject several months ago I have looked particularly at conservation transport and green policies.</p> <p>Policy AD2 on conservation areas once again seems to rely on the council's policies in conservation appraisals. If I remember, these were very much not welcomed at the exhibitions designed to create community approval. I am not sure that they were adopted by the local Town Council. Certainly, there was a problem with the Penzance conservation appraisals. The neighbourhood plan does not include an ambition to create an appraisal, or even to review the present appraisals. There is no ambition to designate other conservation areas despite the general opinion that Penwith is under-listed, considering its many conservation designations. I suggested Dowran, Kellynack Breen and others as possible future conservation areas, perhaps they could be included to encourage the council when it comes to its statutory review process. There does not seem to be an ambition to create Local Lists, which is a common element in most neighbourhood plans. Character areas are also a major element of other neighbourhood plans, for instance the St Ives plan. Were these possibilities excluded?</p> <p>Policy AD5 touches on the tricky subject of disused agricultural buildings. There should perhaps be a plain policy on change of use from agricultural use where that is enforceable. It would be good if the plan encouraged land related uses and community involvement such as in the Bosavern Farm.</p> <p>policy AD8 is bold in its ambition for vistas, but once again there is a lack of mapping or detail as to what vistas and views are to be preserved and it is hard to see what developers could make of this policy.</p> <p>Policy AD9- considering the present prevalence of rambling in the area the policies seem very modest. As the leader of the Pendeen Walking Group, we have met many footpath diversions which are very awkward, and the signage often deteriorates quickly. A local policy should not encourage these</p>	<p>They suggested that you send the map illustration to the town council suggesting that they consider using it as a vision for the parish and that they might wish to consider it alongside the NHP.</p> <p>CC will suitably advertise the forthcoming regulation 16 process. The NHP has to be compatible with existing national policies including the NPPF, our policies would not be able to diverge too much from them.</p> <p>We are re-writing part of the plan to address community aspiration. The town council are currently working on a parish plan (vision for the parish), this is something that you may wish to be involved in.</p> <p>Policy AD2 - designating conservation areas is not within the remit of a NHP, this is something that you may wish to pursue with CC.</p> <p>Policy AD5 - a NHP cannot have a policy giving permission for land change of use, current procedures are in place for land owners to follow. A policy such as this would have no legal basis. agricultural development falls within permitted development (usually).</p> <p>Policy AD8 - we have discussed this policy at length and have decided not to designate specific views and vistas, the rationale is that there are many within the parish. I we designated some areas for preservation, and omitted others, it may leave them vulnerable to development.</p> <p>Policy AD9 - footpaths are within the remit of the town council. I am aware that Penwith local landscape partnership are undertaking extensive work in this subject, this may be something that you could get involved in.</p>	<p>None</p> <p>None</p> <p>None</p> <p>None</p>

	<p>diversions. There is alas no mention of improvements to the network such as the Tinner's Way and Riverside walks.</p> <p>policy aD12- again this is very modest considering the emphasis in consultations with the local community. There is no mention of areas of need for allotments, provision within housing sites and the other possibilities for meeting the demand. Emphasis on visual appearance seems unnecessary.</p> <p>Policy B51. The wording in this important policy area seems uncertain. Suppose developers do not 'intend' a matching appearance, who is to 'assess' the damage to the environment?</p> <p>policy BD5 the emphasis on proportion seems inadequate. Other factors, e.g. bulk and materials are equally important. As mentioned, other plans such as St Ives have detailed assessments of character areas and have promoted detailed design guides. The plan at least might indicate that these will be developed in future</p> <p>Policy BD5 there is no definition of congestion, and compared with the average for the UK, our area hardly suffers greatly from this. The apparent encouragement of parking spaces surely conflicts with the Communities Desire for green policies and carbon reduction. In general, there seems to be very little transport policies, considering this is an area where the local authority has considerable powers. For example, the highways authority could be encouraged to plant trees.</p> <p>There seem to be no policies for public open space and play areas which considering our green environment is very disappointing. More generally as mentioned other plans make reference to the ambitions of the community. for example, the Frome neighbourhood development plan includes priorities for delivering missing links in the Cycle Network, a Valley ecological zone, river corridor proposals, improving bus and coach stops and safe routes for pedestrians and cycling. The Rye plan includes consideration of innovative approaches to town gateways, shared space proposals, 20mph speed limits etc. Our plan needs to be more ambitious and inspirational. I would suggest a further section at least, headed Community Aspirations.</p> <p>In general, the plan should include provision for revision and review, to update. I hope we will vote for the neighbourhood plan on principle, but it could have achieved more.</p>	<p>Policy AD12- again, in the majority of cases, allotments are classed as agricultural development and therefore fall under PD. See policy BD4</p> <p>Policy BD1(5) - This policy has been amended accordingly. The Cornwall design guide refers.</p> <p>Policy BD5 - pleaseSee policy BD1(2) re building materials.</p> <p>St Just and Pendeen have several areas where traffic congestion is a problem, this has been highlighted by several residents in this process. The realistic need for new build developments to provide off street parking is now particularly pertinent, given that electric cars need to be charged.</p> <p>A NHP cannot have transport policies, this is within the remit of CC. Some of our policies have been written to facilitate ease of using public transport. You may wish to discuss tree planting with the highways agency and CC.</p> <p>See policy BD4(7) where we have encouraged developers to design in outdoor play areas in communal developments. St Just and Pendeen both benefit from having existing recreational areas for children. We have also written policies to ensure that new build developments have a good proportion of outdoor space for practical and recreational uses. Existing steer is in place to support this, such as the Cornwall design guide and the CPOAN.</p> <p>Policies in the draft plan do go as far as possible to ensure that new developments link to footpaths, cycle routes and transport links. I would again suggest that you contact the TC regarding the St Just parish pan, I am sure that you could offer some much-needed input.</p> <p>Once again, thank you for taking time to contact us, I do hope that we have gone some way to addressing your representations. You have some great ideas, sadly we are not able to impact on all of them due to the restriction of our remit.</p>	<p>None</p> <p>Amend policy</p> <p>None</p>
	<p>Ref 26/2020 – Parishioner – 5th November</p> <p>I'd like to congratulate you on producing such an excellent document. I know how much work goes into these things and I think what you have produced is commendable.</p>	<p>Steering group reply 25th November</p> <p>Thankyou.</p>	<p>None</p>

APPENDIX 3: AMENDMENTS MADE TO THE DRAFT PLAN FOLLOWING REGULATION 14 CONSULTATION

Contents

- Changes to policies
- Redrafted section 5 This is Our Parish

- Section 7 Consulting our Community redrafted para 17
- Sections 14 Community Infrastructure Levy and 15 Recommendations to Town Council
- Corrections

Changes to policies

Policy AH1: change to: Proposals will be encouraged and supported from community groups.

AH1(1): change to “...a direct benefit to the local community by using innovative routes to affordable...”

Policy AH4(1): change to “benefit to the local community by using innovative routes to ...”

Policy AH5: change to “single storey dwelling” rather than “bungalow”

Policy AD2(3) – Insert the word and between “findings” and “set out”.

Policy AD4: Redrafted text:

All applications for development within Area 1 of the Cornish Mining World Heritage Site must demonstrate that they:

1. follow the guidance set out in the current versions of the WHS Management Plan and the WHS Supplementary Planning Document; developers are encouraged to seek feedback and comments on their proposals from the WHS team at pre-application stage.
2. will not negatively impact on components of the Cornish Mining World Heritage Site, including those that are currently undesignated, which contribute to its Outstanding Universal Value.

Policy AD5: change policy blurb to “...derelict, redundant or disused, historic or listed building for residential...” Also change historic building record to “Historic Building Recording” (HBR)

Policy AD5(2): change to “re-use would secure the preservation of the building and retain its historic integrity.”

Policy AD7 – Open spaces between settlements. Policy redrafted as follows:

Para. 63. Why this policy? The open spaces between the boundaries of existing historic settlements and conservation areas are considered to be significant. Appendix 2 provides maps of the existing settlement boundaries. Maps highlighting the open spaces between settlements are at <https://www.stjustandpendeen-np.org.uk/reference-library/>. The open spaces between settlements are the spaces between St Just and Nancherrow/Tregeseal; Tregeseal and Truthwall; Truthwall and Botallack; Botallack (Cresswell Terrace) and Falmouth Place; Falmouth Place and Carnyorth; Carnyorth and Trewellard; Trewellard and Pendeen (Jubilee Place); Pendeen and Lower Boscawell; Pendeen (Portheras Cross) and Bojewyan Stennack. These open spaces reflect the historic pattern of development within the Parish and significantly contribute to the characteristic appearance of the landscape of the Tin Coast, as well as maintaining the firm sense of individual identity for each settlement. In the household survey 66% strongly supported the principle that open spaces between settlements and hamlets should be protected, and 25% supported it (Q86). The WHS considers it important to keep each settlement distinct and avoid linking or encroachment (Report June 2019) These spaces also provide natural wildlife corridors.

Para. 64. Objective: To preserve the distinction between each settlement from St Just North to Bojewyan Stennack, so as to preserve the historic settlement pattern, wildlife corridors and the distinctive landscape character of the Parish

Text of Policy AD7: Proposals for development which would result in the loss of open spaces between existing settlement boundaries will be supported where they are designed to maintain the visual separation and openness, protect the landscape and historic character of the gaps and the character of the neighbouring built environment, and maintain wildlife corridors.

Proposals that bring about the coalescence of the individual historic settlements, including curtilage developments and cause their distinct individual identity to be lost will not be supported.

Policy AD8: Redrafted:

Development should not compromise those publicly accessible panoramas, vistas and views which characterise the parish and must demonstrate that:

1. the development would not negatively impact upon views and vistas which are of significant historic or environmental importance, and that
2. it would preserve or enhance the character and quality of significant, key views, vistas and panoramas.

Policy AD10: Redrafted:

Proposals for development must

1. Be accompanied by a preliminary ecological survey outlining the biodiversity of the site.
2. Provide a detailed plan of how biodiversity on the site will be conserved and enhanced to demonstrate how long-term biodiversity net gain will be achieved.
3. Where a preliminary survey identifies the existence of threatened or unique to the area, flora or fauna, a more detailed survey will be required identifying particular species and the threat to them.
4. Where a particular threat is identified by a survey, demonstrate how such a threat will be mitigated.
5. If the loss of mature tree woodland, Cornish hedges, hedgerows or other habitat cannot be avoided, provide details of mitigation measures that will still achieve a biodiversity net gain within a decade.

Policy AD11: Redrafted text:

“Proposals for tree planting projects, and for developments including the planting of new areas of suitable species of trees, in appropriate locations, will be supported, provided the proposal complies with advice given in the “Forest for Cornwall” planting guidance, and where the proposal would have no demonstrable impact on its settings and biodiversity”

Policy AD12: change to “.....will be supported, where structures sited within them do not have an adverse visual impact on the character, appearance and biodiversity of the area.....”

Policy BD1(5): change to “.... conversions and extensions should respond do the proportions of local....”

Policy BD2(3): change to “... with communal car parking should provide a proportionate number of car charging points, sufficient for the projected needs of all occupants”

Policy BD4(1): change to “New build developments should allocate an area of outdoor curtilage space that exceeds...” (lose “private”)

Policy BD4(2): change to “Communal new build developments should allocate as much space as is proportionate, to ensure that every person living there has the continual realistic opportunity to use the space for both practical and recreational...”

Policy BD4(3): change to “Outside space on all new build developments, should be of sufficient size in which to accommodate, within the development curtilage.....Communal developments should ensure that cycle storage areas and waste and recycling areas are in a separate screened off area of the development curtilage”

Policy BD4(8): add at the end of the sentence “Proposals which reduce existing outside space that could otherwise be used for parking and practical and recreational use will not be supported”.

Policy BD5: change to “all new development proposals should....” (remove must)

Policy BD5(1): change to “and 2 spaces for homes with 3 or more bedrooms”.

BD5(5): change to “...conversions and extensions should respond to the proportions...”

Policy RE3: point 7 to read: “Any potential impact on traffic operations. Radar and navigational installations and the safe operation of Lands End Airport must be assessed.” The accompanying map has been amended to make it clearer.

Section 5 This is our Parish

This section has been re-written to be more inclusive of the whole parish, as follows:

3. Cornwall’s most westerly parish, St. Just has a distinctive character, shaped by a special combination of its location, topography and history. Set between the West Penwith moors and the rugged west and north-west facing coastline, the influence of the sea and the Atlantic climate it brings are ever present. The natural history of the parish reflects this. Whilst trees are almost wholly confined to the stream valleys traversing the area, the cliffs in spring are ablaze with thrift, sea centaury, wild thyme and sea campion, and heathers cover the local moors. Choughs and Peregrine Falcons are once again commonly seen on local cliffs and migrating birds often make landfall here. The local skies are dark and rich with stars. St Just is the only town in the Parish, but the historic industrial settlements between St Just and Bojewyan Stennack are all Conservation Areas, and most of the farms and its fishing coves here in the parish have been worked since the Medieval period; many have pre-Conquest or prehistoric origins. People have settled in this area for at least 3,000 years, and in that respect, like the rest of West Penwith, the landscape has been a long time in its shaping.

4. For centuries, St Just parish was a remote backwater, barely visited by outsiders. However the large-scale exploitation of its mineral riches during the 19th century was to turn St Just, formerly a hamlet consisting of little more than a parish church, a medieval open air theatre (the Plen an Gwary) and a handful of houses, into a thriving small town with a strong identity. Mining was the driver which saw the parish’s population of less than a thousand at the end of the 18th century swelling to nearly 13,000 only five decades later. The hundreds of houses needed by the rapidly growing mining population and their families were built in

distinctive cottage rows along Fore Street and on the former downs to the west of the medieval parish church. Shops, banks, inns, non-conformist chapels, a National School, a market house, a post office and a Literary and Philosophical institution soon followed, creating an entirely new town in the far west of Cornwall. Houses were built to serve the new iron foundry at Tregeseal, whilst other settlements: Truthwall, Botallack, Carnyorth, Trewellard, Pendeen, Boscawell and Bojewyan Stennack, were established close to local mines. In the 1840s, such had been the rise in the local population that a new parish – Pendeen – was created out of the northern part of St. Just, a new Anglican church being built there entirely through the efforts of local miners. The resultant settlement pattern is historically important and contributes considerably to local identity. For much of the 19th century the local mines and their workforce thrived, with china clay working developing at Leswidden and Bostraze. By the 1870s, however, copper and tin production were globalising, assisted to no small degree by technical developments pioneered in Cornwall, and by the experienced Cornish miners who had emigrated to virtually every continent on the globe, where their skills were in great demand. By the mid-1890s almost every mine in the Parish had closed; huge numbers of local miners had no choice but to emigrate in search of work and many cottages were abandoned. It was nine lean decades before the population again reached those late 19th century levels. A few local mines survived, indeed thrived. Geevor was the most notable example, becoming the largest local employer throughout much of the 20th century, but even it was forced into closure in 1991 following the worldwide crash in tin prices in 1985. Over 400 men were made redundant, and the impacts on much of the local economy and its businesses and community were cruel. Only the south of the parish, whose economy had always been based on farming and some fishing, remained little affected by these changes.

5. Despite this, St Just town has become established as a sustainable urban centre in West Penwith. Though local people frequently have to travel to Penzance and beyond to find work, the local community has proved itself to be strong, and capable of adapting to change. There is now an established annual cycle of activities, with events traditional and new such as St Piran's Day, the Lafrowda Festival and Feast. Medieval and modern theatre is staged in the Plen, local artists have become nationally renowned and St Just has developed a thriving music scene. High speed broadband is now readily available, favouring remote-working businesses, and Land's End Airport to the south of St Just provides ready links to the Isles of Scilly. The community is diverse, supportive and strongly networked. Residents believe strongly that it is a good place in which to live and work. Furthermore, over the last two decades, the area's values have become recognised by discerning visitors, who value its coastline, its industrial sites, its natural history and the welcoming nature of its community.

6. There have, of course, been some downsides to the opening up of St Just parish – the prices of what had previously been locally-affordable traditional miners' cottages have risen far beyond what most local people can afford; recently there is increasing evidence of properties being purchased as second homes or being converted to holiday lets, causing concern to many local residents. More recent larger scale developments within or on the outskirts of many of the settlements, and smaller developments around many of the original farming complexes and small coves e.g Bosulow and Nanquidno, have occurred. Some of the larger developments have included more affordable housing specifically for local occupation. The town can still fulfil the community's everyday needs in spite of competition from supermarkets in Penzance and new outlets have been opened in the form of cafes, galleries and shops selling local crafts and tourist items. In the other settlements many shops have been lost. The area's popularity with visitors has brought employment to local people as well as pride that others, nationally and internationally, value what the area has to

offer - Geevor, Cape Cornwall, Levant and Botallack, the inclusion of much of the St Just parish in the Cornish Mining World Heritage Site and the particular appeal of the local landscape are now firmly established on the international tourist map. Businesses meeting a local need and with an attractive offer for visitors can do well here, as do an increasing number serving markets outside the immediate area.

7. The needs within the parish now are for both affordable homes and well-paid, locally-based jobs to be made available if coming generations can continue to be able to afford to live and work here and maintain this community. The challenge faced by this Neighbourhood Plan, and for other bodies, is therefore to facilitate development which will benefit the local community whilst preventing erosion of the character of the local landscape with which local people so strongly identify and which visitors find so attractive. The policies in our Plan represent the aspirations of our community to achieve this.

Section 7 Consulting our Community

Replace entire content of paragraph 17 with the following:

The public (Section 14) consultation took place October 12th – November 23rd, 2020. Bearing in mind the limitations imposed by Covid-19, we aimed to ensure that every household had an equal opportunity of participating. Leaflets with a summary of the policies, information on where to view the plan, how to ask for explanations on any of the policies, and how to comment. were delivered to every home (2580 dwellings). Links were posted on social media and prompts published in the local paper and parish magazine. Arrangements were made to provide hard copies and collect written comments on request. There were 230 downloads of the Plan and 26 public responses. Each response received was discussed by the Steering Group and further advice sought where necessary. Full details of the responses and the action taken as a result, including amendments to the Plan, are on the website.

Section 14 Community Infrastructure Levy and 15 Recommendations to the Town Council

- The order of the two sections is reversed, so that 'Recommendations to the Town Council' comes first as section 14. Sections are renumbered accordingly.
- Strapline for pp 50 and 51 to be: Recommendations and Aspirations for the Future
- New para 111 (formerly 114) to read:
"The Household Survey raised some important points which are outside the scope of the plan, but which are clearly very important to the residents of the parish. Included below are recommendations to the Town Council to progress these, and steps that the Town Council can take to support the policies in the plan ..." followed by the detailed items in former para 114.
- Parking section of new para 111: : addition to last sentence to read: `...to have parking provision and to have due regard to any impact on traffic congestion ..." New last sentence to be added: More details of residents' views on parking are in the Survey Report questions 26- 49.
- Future development and local facilities section of new para 111: add at end of last sentence: "together with the likely impact on traffic."
- Add additional section at end of the list of recommendations in new para 111:
"Other local needs: residents considered that more facilities were needed for both children and young people, and older people. Broadband strength was generally thought sufficient but the Town Council could keep this under review as 5G rolls out."

- New section 15 heading to be: “Aspirations for the Future”
- New para 112 under this heading to read
“Following on from the evidence gained from responses to the Household Survey and other public consultations whilst preparing the NDP, there are a number of other recommendations and aspirations that have been a common theme, but fall outside the remit of the NDP. It is however important to acknowledge them here, and set out a list of priorities as determined by local residents for use for Community Infrastructure Levy (CIL) or s106 funding or successor arrangements.
 - to increase public car parking spaces, including the use of summer car parks when pressure is greatest
 - traffic improvements, including bus stops at Carn Bosavern and Lower Boscaswell
 - to improve recreational and sports facilities for children and young people
 - promote community renewable energy schemes (see policy RE1) and support households in reducing energy consumption and cutting energy costs. [NB this point was amended slightly to better reflect the survey results.]
 - in circumstances where the above cannot or do not apply, priorities determined by the Town Council

New para. 115. It is also important to note that the St Just Parish Plan 2020-2030 prepared by the Town Council sets out further aspirations for the future of our parish, as defined by and agreed with the community, and how these can be delivered.

Corrections

- **P.8 Education section:** Cape Cornwall School (secondary) is a *two*-form entry ...
- **Housing statement:** delete last sentence of para 31 page 14 “In the public consultation....”
- **Policy BD8:** to read “Dark Sky Park” not “Dark Sky Reserve” (para 89)
- **Appendix 1 Evidence index:** corrections to references

Textual and layout amendments are not listed.

APPENDIX 4: STEERING AND WORKING GROUP MEMBERS

Neighbourhood Plan Steering Group Members	Responsibility
Steve Hall	Chair to July 2020 (resigned)
Dot Stevens	Chair from August 2020; Appropriate Development policies
Debbie Shepherd	Vice-Chair, TC representative
Judith Summers	Secretary to August 2020 (resigned)
Jill Taylor	Secretary from September 2020; organiser of public consultation ; lead, building design policies
Sarah Tieken	Treasurer; commercial development policies
Zoe Baxter	TC representative (resigned January 2020)
Kate Beckly	Lead, climate change/ renewables policies
Sue James	Cornwall Councillor
Jeremy Redwood	(unable to attend 2020)

Dave Stevens	Website; lead, commercial development policies
Neil Taylor	Appropriate development policies
Tim Wotton	Appropriate development policies (resigned September 2020)
<i>Members from the former sub-groups</i>	
Jo Forsyth	Lead, affordable housing policies
Dave Munday	Lead, natural environment policies
David Osborne-Broad	Lead, Plan design and print
Adam Sharpe	Lead, historic environment policies
<i>Circulation list / contributions from time to time</i>	
Marna Blundy	Mayor
Constance Moore	Town Councillor, Chair TC Climate Change Committee
Grenville Prowse	Town Councillor
Cornelius Olivier	Unable to attend from March 2020
Kirsty Pritchard	Unable to attend 2020

Working Group Members	Themed Working Group
Marna Blundy, Cait Chatwin, Fiona Cock Mel Faulkner, Rachel Fisher, Stef Gulliver, Mark Hankins, Sue James, Julia Kerrison, Sara Olivier, Jill Taylor, Neil Taylor, Dave Stevens, Delia Webb	Community Engagement Group. Remit: preparation and delivery of the 'Have Your Say' and 'Defining Development' consultation phases and maintaining other engagement activities
Russ Durbridge, Jo Forsyth, Richard Gowan, Jim Hurditch, Esther Kieboom, Jon Manser, Jess Morris, Vic Mouldsley, Constance Moore, Dave Munday, David Osborne-Broad, Kirsty Pritchard, Grenville Prowse, Cornelius Olivier, Nicola Shanks, Adam Sharpe, Dot Stevens, Judith Summers, Tony Wood, Tamsin Young	Natural/ Historic/ Built Environment. Remit: initial scoping of issues; preparation of questions for household survey; researching evidence.

APPENDIX 5: NEIGHBOURHOOD PLANNING CC OFFICER CONSULTATION RESPONSE

[next page]

Cornwall Council Response	
Neighbourhood Development Plan Proposal	St Just
Consultation documents	St Just draft Neighbourhood Development Plan
Consultation Start Date	03/07/2020
Consultation End Date	24/07/2020
Cornwall Council Team	Response Date
Affordable Housing	16/07/2020
Development Management	No comment yet.
Development Management – Area Team	
Economic Development	
Education Infrastructure	No comments
Environment Service - Ecology	
Environment Service – Flood and Coastal Environment Officer	06/07/2020 24/07/2020 Dionne Jones
Environment Service – Open Spaces Officer	
Environment Service- Landscape	
Environment Service- Forestry	
Historic Environment	
Local Plan Team – Community Infrastructure Levy	14/07/2020
Local Plan Team	
Cornwall Fire and Rescue Service	
Transport	
Officer response	
<p>Environment Service – Drainage (Jackie Smith)</p> <p>This response refers to sustainable drainage systems. A response relating to flood risk and coastal erosion will be forwarded.</p>	

With respect to sustainable drainage systems Policy BD2 within the document refers to the CC Sustainable Drainage webpage which contains details and guidance. Policy BD2 item 7 encourages the use of sustainable drainage systems where practicable. This approach is acceptable to the LLFA.

Environment Service – Catchments and Coast team (Dionne Jones)

At SEA stage I have identified a few additional evidence sources that should be taken into account, mainly around climate change resilience. The main flood risk issues are covered.

Climate Change

I strongly support the inclusion of climate change resilience in the vision and the overarching objective on climate change. Justification: The NDP covers the period up to 2030 which will be crucial for limiting the most dangerous impacts of climate change. The NPPF requires that residential dwellings are built to last 100 years and commercial properties 50 years - the impacts of decisions made using this NDP will therefore extend far beyond 2030.

The draft Cornwall Climate Change DPD is referenced.

Please also refer to the Climate Change Guidance Note for Neighbourhood Planning on Cornwall Council's website: <https://www.cornwall.gov.uk/environment-and-planning/planning/neighbourhood-planning/preparing-a-neighbourhood-plan/neighbourhood-planning-guide-notes-and-templates/#-tab-359260>

What NDP's can do:

- Location of new development – proximity to services.
- Protect existing services, resist change of use.
- Multifunctional green infrastructure.
- Flood resilience and coastal change policies.
- Natural open SUDS.
- Habitat connectivity and biodiversity net gain.

- Allocate sites for renewable energy.
- Encourage better quality design.

The main climate change impacts in St Just Parish are likely to be increased flooding (fluvial and surface water), storm damage, drought and wild-fires. Green infrastructure, including Cornish hedges, can increase the parish's resilience to flooding.

Policy BD1 could include climate resilience – e.g. using materials that will weather well in Cornwall's damp climate and raised sockets to minimise flood damage.

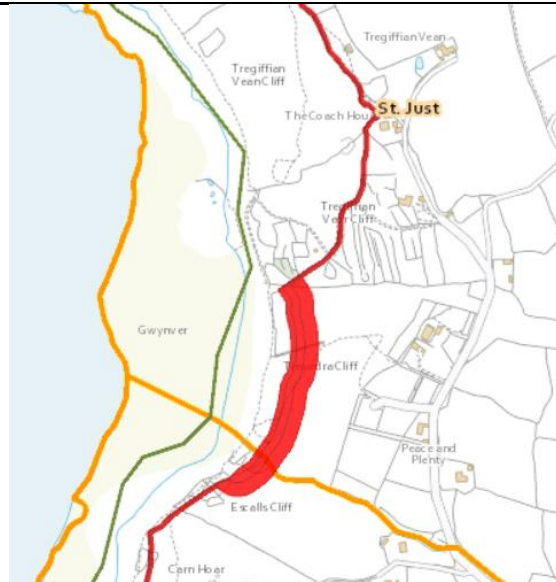
Coastal Change

Please reference the **Shoreline Management Plan** in the NDP document and evidence base to encourage planning applicants to review it at an early stage and thus avoid any unexpected costs or delays.

Development must be consistent with the management policies in the Shoreline Management Plan (SMP), which is a material consideration for planning. This is a policy document for coastal defence planning which sets out the recommended approach to managing the shoreline over the next 100 years. St Just parish is covered by *Policy Development Zone 9: Land's End to Clodgy Point (St Ives)*. This section of coast is in Management Area 24 and the parish comes under Policy Unit 24.1. Minimal erosion is projected along this coast over the next 100 years, hence the SMP policy intent is "No Active Intervention." This is a decision not to invest in providing or maintaining defences or natural coastline. Any development in the parish must be consistent with this policy to allow natural processes to continue on this coast, which in turn satisfies the objectives of Cornwall AONB and the Heritage Coast.

The SMP doesn't foresee a coastal change risk to the SW Coast Path in this parish. The seafront road at Sennen Cove *is* at risk of being lost to coastal erosion, but the vulnerable section appears to be just outside the St Just parish boundary and the SMP policy there is to "Hold the Line" (maintain or upgrade existing defences).

Some roll back of the dunes is projected behind Gwynver Beach, but no infrastructure or properties appear to be at risk.



A number of historic features at Botallack are potentially at low risk from coastal erosion. Surveillance of cliff recession rates is recommended in the SMP.

References:

SMP 2016: <https://www.cornwall.gov.uk/environment-and-planning/countryside/estuaries-rivers-and-wetlands/flood-risk/coastal-erosion-and-shoreline-management/shoreline-management-plans/shoreline-management-plan-2011-smp2/>

MA 24 Policies: https://www.cornwall.gov.uk/media/33386693/pdz9_final_report_24.pdf

Cornwall draft Planning for Coastal Change Chief Planning Officer's Advice Note:
<https://www.cornwall.gov.uk/environment-and-planning/planning/planning-policy/adopted-plans/planning-policy-guidance/cornwall-planning-for-coastal-change/>

Rapid Coastal Zone Assessment for heritage features:
https://archaeologydataservice.ac.uk/archives/view/rcza_cornwall_ca_2019/downloads.cfm

Local Plan Policy 26 Flooding and Coastal Risk

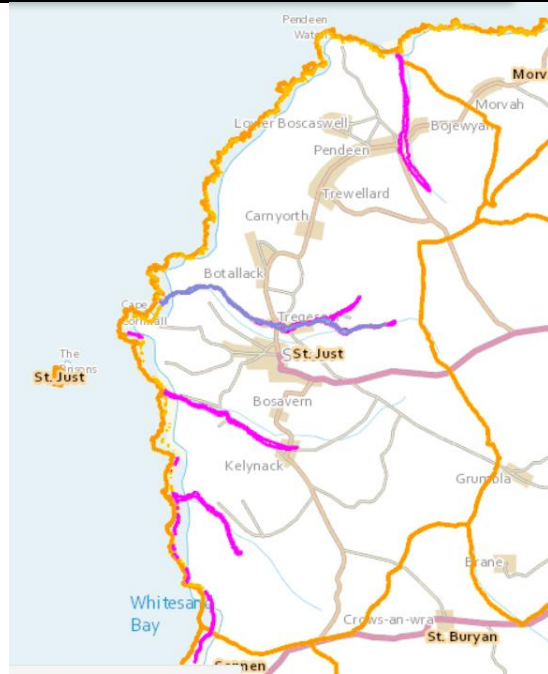
Local Plan Policy 16 Health and Wellbeing

NPPF 2018, paras 166 to 169.

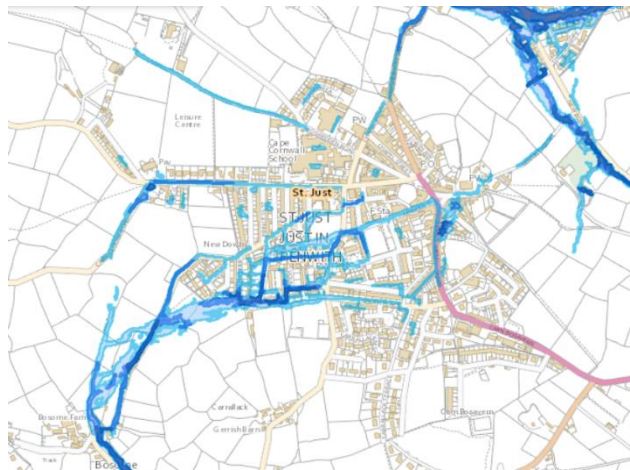
Flood Risk

The draft NDP has considered flood risk, green multi-functional SuDS, management of foul and surface water and impervious paving. This is all good practice.

Fluvial flood zones:



There's a surface water flood risk in the river valleys and low points in the parish, for instance at St Just:



The EA surface water flood risk map could be used by developers to design their SuDs schemes in harmony with local water flows.

Policy AD11 – Allotments – I suggest adding run-off/ soil loss to the criteria. Allotments on steep slopes should be avoided because of the risk of exacerbating run-off from bare soil.

References:

CC interactive mapping EA/ hydrology layer: <https://www.cornwall.gov.uk/community-and-living/mapping/>

Strategic Flood Risk Assessment (includes sea level rise): [Link](#).

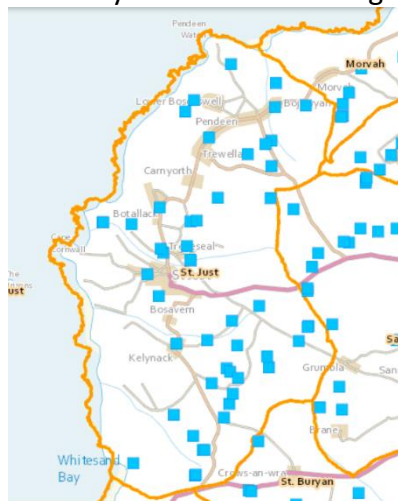
Neighbourhood Planning Flooding and Drainage Guidance Note at:

<https://www.cornwall.gov.uk/environment-and-planning/planning/neighbourhood-planning/preparing-a-neighbourhood-plan/neighbourhood-planning-guide-notes-and-templates/#-tab-359262>

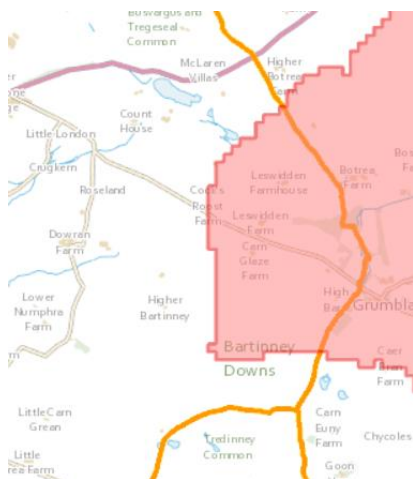
SUDS case studies and further guidance: <https://thefloodhub.co.uk/knowledge-hub/> and <https://www.susdrain.org/case-studies/>

Water Quality

There are a large number of private water supplies in the parish which should be protected from any surface water or agricultural run-off risk:



There are no designated bathing waters or shellfish waters in the parish. A small area near Grumbla falls within an Area Affecting Bathing Waters:



Environmental Growth

I'm really pleased to see a biodiversity policy in the NDP. It's encouraging that the people of St Just parish value their natural environment so highly, not just for access and visual (i.e. human) reasons, but for its biodiversity. Importantly the policy includes enhancement as well as protection.

I recommend that the NDP group reviews the **Cornwall Environmental Growth Strategy** objectives for context, strategic steer and to formulate wording for the NP policies and justifications. The strategy is a material consideration for planning. See:
<https://www.cornwall.gov.uk/environment-and-planning/cornwall-and-isles-of-scilly-local-nature-partnership/cornwall-s-environmental-growth-strategy/>

Please sign-post to the **Cornwall Biodiversity Planning Guidance**:
<https://www.cornwall.gov.uk/environment-and-planning/planning/planning-policy/adopted-plans/planning-policy-guidance/cornwall-planning-for-biodiversity-guide/>

Please signpost to Cornwall Council's minimum **biodiversity net gain target**:
<https://www.cornwall.gov.uk/environment-and-planning/planning/planning-policy/adopted-plans/planning-policy-guidance/biodiversity-net-gain/>

A Lighting Impact Assessment could be encouraged for larger developments. Specialist expertise is needed to identify the most appropriate design solutions and technologies to accommodate the needs of different species.

The NDP team may wish to consider including a policy for **replacement dwellings**.

An issue with replacement dwellings and conversions is a reduction in the size of gardens and gardens being replaced with hard surfacing for parking, which reduces habitat connectivity and increases surface water run-off.

A suggested policy could be: *"Replacement dwellings will be supported where they maintain and preferably enhance habitat connectivity and flood management by retaining trees and green corridors and using permeable surfaces."*

Cornwall Maritime Strategy

The NDP group may wish to review the Cornwall Maritime Strategy objectives for context, policy alignment, strategic steer and to formulate wording for the NP policies and justifications. The Maritime Strategy is a material consideration for planning. This would help with completing the response to the Maritime section of the Sustainability Check. See:
<https://www.cornwall.gov.uk/environment-and-planning/maritime-strategy/>

For instance, any coastal change or flood management policies would align with the following outcome in **Cornwall Maritime Strategy 2019-2023**:

Target Outcome D: *"Cornwall has healthy, safe and vibrant coastal communities that have a strong relationship with the sea and coastal environment."*

Objective D7: *"Use a place-based approach to strengthen the resilience of maritime*

communities to the social, environmental and economic impacts arising from future events and shocks, including natural hazards, climate change and socio-political change.”

Local Plan Team – Community Infrastructure Levy (Ryan Searle)

The Parish of St Just is within CIL Charging zone 4, and as a designated rural parish, new developments of 1-5 dwellings will be liable to pay £100 per sqm, and developments of 6 or more will be liable to pay £35 per sqm. However, affordable housing and self-build developments are able to claim exemption from liability to pay a CIL charge. Rural Exception Sites are also exempt from CIL.

From 1 January 2020, indexation will apply to the adopted rates - this is set out in the [Annual CIL Rate Summary 2020](#), which shows the rates that will be applied to permissions granted (or prior approval developments commenced) during the calendar year 2020.

CIL came into effect in Cornwall on 1 January 2019. From this date, developments creating one or more dwellings, or new floorspace of 100sqm or more, could be charged CIL. However, CIL will only become payable on commencement of a development (not granting of planning permission), which means there is always likely to be delay between a development being granted permission and when it has to make a CIL payment.

Of the CIL income received, 5% can be retained by the Charging Authority (Cornwall Council) for administering the process, 15% (25% for a parish with a made NDP) is paid directly back to the Town or Parish Council (the ‘Neighbourhood Portion’) in which development takes place (the ‘Neighbourhood Portion’), and the remaining 70-80% (the ‘Strategic Share’) must be spent on infrastructure to support the development of the area. The CIL Strategic Share in Cornwall is going to be made available to communities, organisations, and other Council services, via a bidding process.

Applications ranging from £20,000 to £100,000 for the ‘Strategic Share’ are invited from 1 July 2020. Applications for infrastructure projects will be welcomed from constituted community groups, Town and Parish Councils, and not-for profit organisations (including Cornwall Council services). Deadline for applications is 19 October 2020. Projects must demonstrate how they will contribute to achieving low carbon living for communities. The application form and guidance documents are available at <https://www.cornwall.gov.uk/environment-and-planning/planning/planning-policy/adopted-plans/community-infrastructure-levy-cil/cil-fund/>.

More information on CIL can be found on the Councils website at www.cornwall.gov.uk/cil. Any specific queries can be sent to cil@cornwall.gov.uk.

Affordable housing (Emma Ball)

Note: Comments are confined only to the affordable housing implications of this proposal and are made without prejudice to any formal decision of the Planning Authority.

Current evidence

Homechoice register (affordable homes to rent)

Parish	Band	Council Bedroom Need				Total
		1	2	3	4	
St Just	A	7	1	1		9
St Just	B	1	2			3
St Just	C	12	1	2	3	18
St Just	D	1	2			3
St Just	E	28	18	5	1	52
St Just Total		49	24	8	4	85

Of the **85** registered on the Homechoice register in St Just, there are **29** residents who are aged 55+ requesting mainly 1 or 2 bed accommodation. This includes **13** people under category 2 who either require a property suitable for people who cannot manage steps or stairs and may use a wheelchair or are only able to manage 1 or 2 steps or a small flight of stairs. This indicated a need for accommodation designed to meet the needs of older people and we would like to see this in the form of bungalow accommodation. There is **1** person on the register under category 3 who requires a 1 bed property suitable for wheelchair use indoors and outdoors.

In addition, there is an indicative need for Intermediate Homes for Sale and Shared Ownership. Please note that Help to Buy South West Register ceased in December 2019 when Help to Buy South took over. Former applicants were not notified of this change and the requirement to re-register. The registered numbers as at the 3.12.2019 were 12.

Relevant Policy Position:

Neighbourhood Development Plans (NDP) must conform to local, national and strategic planning policy. In relation to affordable housing, the documents listed below are of particular relevance:

- The National Planning Policy Framework (NPPF);
- Cornwall Local Plan adopted
- Adopted Housing Supplementary Planning Document

These set out the Local Planning Authority's (LPA's) expectations in relation to residential developments contributing towards the delivery of affordable housing and define delivery mechanisms for this area. Consequently, the Affordable Housing Team would recommend the documents above are used to inform the evolution of the NDP; its policies; and any site allocations, in due course.

In particular, Policy 8 of the Cornwall Local Plan,

New developments should always provide a range of property types, sizes and tenures, to reflect the need to develop a mixed, yet balanced community. Typically the Council's target provision are in the following tenure proportions;

70% affordable rented homes

30% Intermediate housing for sale

In AONBs and Designated Rural Areas the Council is only permitted to seek off site contributions in lieu of affordable housing on schemes delivering between 6 to 10 dwellings and not seek the provision of on-site affordable housing. The St Just parish is in value zone 4 and the target level of affordable housing as set out in the Cornwall Local Plan is 30%. On schemes of over 10 dwellings the Council can seek on-site provision of affordable housing. Please note: the threshold does not apply to exception sites which are defined as;

Small sites used for affordable housing under in perpetuity where sites would not normally be used for housing. Rural exception sites Policy 9 (set out above) seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection.

Comments on policy

There are minor amendments needed to some of the policy wording, policy justifications and some errors with the bullet point numbering. The policy boxes do not need to be numbered. The minor amendments are highlighted in red.

Policy AH1

1. Can demonstrate a direct benefit to the local community by using different routes to affordable housing to provide **permanently** affordable housing **in perpetuity**.

Policy AH2

Policy AH2 Justification

The need for affordable housing is shown by the HNS. ~~7985~~ **7985** applicants were on the Homechoice register in **24th June 2020**~~September 2019~~. 15 households seeking an affordable home to buy in the parish were registered with Help to Buy South-West. **Please note that Help to Buy South West Register ceased in December 2019 when Help to Buy South took over. Former applicants were not notified of this change and the requirement to re-register. The registered numbers as at the 3.12.2019 were 12.**

The HNS shows 'hidden need' (28 households) in addition to these figures. The Household Survey supports development specifically **allocated** for affordable housing (Q91: 37%, support, 26% strongly support). Stakeholder interviews with LiveWest representatives have also emphasized needs for modern housing (Report, January 2019). *References: NPPF 60, 61, 63, 74; CLP Policy 8; Cornwall Supplementary Planning Document (SPD):*

Policy AH2

1. *Contain a justifiable balance of open market housing with affordable housing providing a mixture of tenure which reflects local need and meets the Cornwall Local Plan target levels of affordable housing identified in Policy 8. The affordable housing element should be delivered as a **tenure-blind** development.*

Tenure-blind

The Ministry of Housing, Communities and Local Government's National Design Guide, published October 2019, contains the following definition within its section on social inclusion.

Tenure neutral: Housing where no group of residents is disadvantaged as a result of the tenure of their homes. There is no segregation or difference in quality between tenures by siting, accessibility, environmental conditions, external facade or materials. Homes of all tenures are represented in equally attractive and beneficial locations, and there is no differentiation in the positions of entrances. Shared open or play spaces are accessible to all residents around them, regardless of tenure. (p36)

Policy AH4

1. can demonstrate a direct benefit to the local community by using different routes to affordable housing such as self-build, in accordance with the NPPF definition of "other affordable routes to home ownership", to provide **permanently** affordable housing **in perpetuity**.

I would suggest wording for a separate policy which meets the needs of an aging population: -

Policy *: Housing for older people

Housing proposals, where affordable housing is required, must reflect the needs of the community. Well-designed housing intended for occupation by older people in the form of accessible and adaptable ground floor apartments, adaptable upper floor apartments and bungalows should be required as part of the overall development mix.

If the steering group do not wish to create another affordable housing policy, I would suggest adding to policy AH4 as bullet point three, starting with the wording "well-designed housing etc"

If you have any queries your affordable housing contact is Emma Ball, Affordable Housing Officer and can be contacted on email emma.ball@cornwall.gov.uk

Emma Ball, Affordable Housing Officer, Cornwall Council