

THE ROSELAND PLAN

OUR ROSELAND - OUR FUTURE

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Consultation Statement

Appendix 8

Assessment of Responses to Consultation 3rd August 2014 - 14th September 2014

Produced by the
Roseland Neighbourhood Development Plan Steering Group
4 November 2014



FOREWORD

All of the responses submitted as part of the Consultation period (3rd August - 14th September 2014) were gathered together. There were 49 responses from individuals and 13 responses from Stakeholder businesses and organisations. Some individuals sent more than one submission, ie there were responses from 42 individuals. We have included in this document input from an assessment of the Consultation Draft by the Neighbourhood Planning Independent Examiner Referral Service (NPIERS).

To aid assessment of the responses, each submission was assessed and the relevant parts grouped with the parts of other submissions concerning the same topic. Thus, we generated a set of documents relating to a certain number of general matters and another set which consisted of comments on individual pages of The Draft Roseland Plan. Consistent with this approach, the Management Team considered the 'General Submissions' first and then moved on to the 'Page-by-Page' assessment.

In the document which follows, we have listed the relevant submission together with the action we decided upon and the rationale for so doing.

Responses from Stakeholder organisations are identified while, to maintain confidentiality, those from individuals are identified by a unique response number.

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APPENDED LETTERS, EMAILS

(S1 - CAA, S3 - Fal River, S8 - The Nare Hotel)

MAJOR POINTS

The responses to the Consultation were many and varied. In the document below, they are considered one-by-one. However, a small number of matters were raised by 3 or more respondents and our responses are listed here.

Issue	Response
Infrastructure Developments not specifically covered in the Plan.	Acting on advice from Cornwall Council, we have inserted a section emphasizing that infrastructure developments should be read in the context of Commercial Development policies.
Scale of Developments not sufficient	The community has a 'high quality landscape' agenda which means that developments are likely to be small scale to conserve the special, intimate character of the Roseland. Our innovative approach to building of Affordable Housing does not require the building of open market housing for cross-subsidy.
Definition of 'Major Developments' excluded (except in exceptional circumstances) in AONBs	We have taken the advice of the AONB unit, the National Trust and Cornwall Council by (now) defining major development using the approach set out in the Tamar Valley AONB Management Plan.
Full Time Residency Requirement for new open market housing	The approach set out in Policy HO8 is consistent with that adopted in the recently-passed Lyn Plan. No other allowable approaches to try to maximise the number of full time residents and limit the number of houses occupied for only part of the year have been suggested to us. There is a possibility that this matter could be addressed in future through the Sustainable Communities Act.

PART I COMMENTS - GENERAL

1.1 GENERAL	PROPOSED ACTION & RATIONALE
<p>1 - Finally John I think you have done an incredible amount of work, and we have all been very lucky to have you working so hard on our behalf. A very sincere thank you.</p>	<p>No change to policies but thank you for your support.</p>
<p>9 - Only one comment: the committee is to be congratulated on producing an excellent plan.</p>	<p>No change to policies but thank you for your support.</p>
<p>3 - I do not think incomers like myself should interfere with what the villagers of St Mawes want to do.</p>	<p>No change to policies but thank you for your support.</p>
<p>7 - First, congratulations on the Draft Plan. A really attractive, readable and yet comprehensive document that should be of great value and influence if used effectively. It documents the careful process followed, and therefore provides the democratic legitimacy needed to use the Plan as an advocacy or campaign tool.</p>	<p>No change to policies but thank you for your support.</p>
<p>15 - Congratulations on a well thought-out and presented plan. Have no specific comments other than that we fully support all the aims & objectives and hope that they are followed by the ultimate decision makers, whoever they may be. As they say, the proof of the pudding is in the eating!</p>	<p>No change to policies but thank you for your support.</p>
<p>17 - Positive words about the Plan. 'Beautifully presented and easy to understand.'</p>	<p>No change to policies but thank you for your support.</p>
<p>4 - The Roseland Plan will be very expensive to deliver - who will pay?</p>	<p>No change to policies. The cost of preparing the Plan is met by local government, and there will be no implication on costs for repair and maintenance of buildings. In some circumstances there may be cost implications for new building but this will only become apparent when the Roseland Design Guide has been completed.</p>
<p>Trying to keep everything "as it is" while "greening it" and making everything "affordable" is probably impossible.</p>	
<p>There are two large renovation projects in Portloe at present which have been ongoing for over a year. Cornwall Council approves these - how will the Roseland Plan stop such work. Suspect it cannot as it could breach Human Rights. Problem is: cash wins in the end.</p>	<p>The Roseland Plan will not stop renovation projects. In fact,</p>

<p>S4 - St Mawes and St Just in Roseland Society - We have studied the Draft Neighbourhood Development Plan and feel that as a Society it meets the aspirations that we have for the future of the Roseland and particularly the St. Just Parish.</p> <p>19 - In general terms I would like to congratulate the steering group for producing such a good document and representing the views of the residents of the Roseland.</p> <p>20 – 20mph speed limit Gerrans/Portscatho.</p> <p>30 – This is a very thoroughly prepared and researched document that represents the consensus of local resident’s views. There are many safeguards built in and I am happy to accept the recommendations made in their entirety. Congratulations on a job well done.</p> <p>22 - Congratulations to everyone for all the hard work which is much appreciated.</p> <p>25 - Firstly I would like to congratulate the team on producing, what I consider to be, an excellent, high quality draft plan. I found it to be well structured, easy to read and pleasing on the eye, which is much more than can be said of most official documents.</p> <p>Secondly, just an observation. Grade 3b agricultural land is referred to by the plan several times, and the distinction between grade 3a and 3b is significant in planning terms. However, I couldn't find reference in the plan to a source to identify the classification of particular parcels of land. I'm no expert, but I believe I have found a suitable official data source, to which I have placed a link below:</p> <p>http://magic.defra.gov.uk/MagicMap.aspx Perhaps it would be useful to add this reference, or a similar one, to the appendices.</p>	<p>renovation will be an important part of the Roseland’s future provided it meets the criteria set out in the Plan.</p> <p>No change to policies but thank you for your support.</p> <p>No change to policies but thank you for your support.</p> <p>No change to policies. Not a land use issue but matter will be referred to highways department of Cornwall Council.</p> <p>No change to policies but thank you for your support.</p> <p>No change to policies but thank you for your support.</p> <p>No change to policies but thank you for your support.</p> <p>Maps showing agricultural land quality are given in Appendix K30. Where no maps exist differentiating between grade 3a and 3b agricultural land, the applicant is required to complete a soil test.</p>
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<p>32 – I believe we should have a policy which deals with signs both temporary and permanent and in a similar context policies which seek to reduce the number of highway and tourist signs or at least rationalise their grouping and location.</p> <p>37 – Add policy to protect and preserve the landscape and communities of the Roseland, the peninsula shall be a Nuclear free Zone.</p> <p>36 - We are most concerned about the possibility of storage for nuclear warheads being proposed on the Fal estuary – Turnaware/Tolverne/Trefusis, so would wish to add policy:</p> <p>“The whole of the Roseland peninsula shall be a nuclear free zone to preserve the landscape and communities of the area” (having marched around Truro in 1960 to ban the bomb).</p> <p>34 - “Plan Area: the parishes of Gerrans, Philleigh, Ruan Laniorne, St Just in Roseland and Veryan.”</p> <p>General Policies applicable to all development NB Changes shown in bold. Mainly these are changes for consistency and clarity of language. Changes of substance are commented on specifically. NNB Suggest for clarity that the policies are relettered as GL (general landscape) GV (general character of villages and hamlets) and GSF (General Services/Facilities) and that GP polices are added to this section.</p> <p>NNNB “Proposals for development” is used to provide standardisation in drafting. The phrase “only where they have demonstrated” –</p> <ol style="list-style-type: none"> 1. makes it clear that complying with the relevant policy is a necessity for permission but does not guarantee it, and 2. puts the obligation onto the applicant to provide the necessary information regarding compliance with the relevant policies before the application for planning permission will be considered. <p>Policies applicable to commercial [and other infrastructure] development</p> <p><i>Comment: the Plan contains nothing on development which is not residential housing, commercial or energy development. What</i></p>	<p>No change to policies. Issue will be included in brief for Roseland Design Guide.</p> <p>No change to policies. Professional opinion received from Cornwall Council Planning Department states this issue cannot be included within a neighbourhood plan.</p> <p>No change to policies. Professional opinion received from Cornwall Council Planning Department states this issue cannot be included within a neighbourhood plan.</p> <p>No change to policies.</p> <p>We agree to standardise the wording of all policies where possible.</p> <p>'Other development' referred to Cornwall Council Planning Dept.</p>
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about proposed infrastructure development? Highway developments (e.g. road “improvements”)? New Cornwall Council or Parish Council facilities (you never know!)? Mobile phone masts provided with government subsidy.

S9 - CAD Architects - Conclusion The NPPF has attempted to change planning policy from negative, restrictive, anti-development and anti-progress. To a forward looking process which encourages good, sensitive well designed and well planned development. Unfortunately the RNDP reads as the former and not the later. The policies are generally written to prevent development and not to enable good development. The policies if implemented will lead to stagnation in the local economy and a less welcoming and inclusive community. We strongly advise the Roseland Neighbourhood Development Plan Steering Group to review the plan and policies, to make the plan a positive plan for development. Acknowledge that growth is a requirement and actively plan for that growth.

24 - Huge congratulations on the plan and a big thanks to everyone who has been involved, it’s been a massive undertaking.

Please find attached a couple of specific responses from me.

I do also have some general concerns though, which are difficult to explain, but here goes..

One of the reasons ***** withdrew from the development on St Mawes was that it was becoming apparent that such a large scale development would not be supported by local people, yet our motives in the first instance were to build a hotel to create employment and additional facilities for the parish, and also to build open market housing which would subsidise some affordable housing for local people. Even if our proposal had gone through planning easily it would have been 8/10 years before we actually made a profit on any of it.....

I think that the difficulty I have with the plan is that it will massively restrict future developments of both housing and those of a commercial nature, which will in turn mean less employment and housing for local people.

Agreed - we do not need policy for every issue. Insert wording that infrastructure projects should be read in the context of commercial development.

No change to policies. The Plan is firmly based on our community's 'high quality landscape' agenda, meaning that development is likely to be smaller scale to conserve the special, intimate character of the Roseland. The Plan is very positive about small-scale, landscape-friendly development.

No change to policies but thank you for your support.

The Plan is based on feedback from local residents and businesses.

The scale of developments which are proposed in the Plan come directly from the community. The community’s priority is a high quality landscape agenda, ie to conserve the special, intimate character of the Roseland and encourage small scale, landscape friendly developments, be they

<p>Because it's based on feedback and what people would like to see, there is no injection of any commercial reality.</p> <p>Of course we would all like to see housing developments of less than five properties - but how many developers can afford to build just five houses - where is their economy of scale?</p> <p>Equally, for a hotel to be viable the general rule of thumb is that it needs at least 36 bedrooms (or a Michelin Star restaurant) to be profitable. So if a hotel want's to expand are we going to refuse it and then face the possibility of it closing and not only losing employment but also the additional income the tourists spend in the local area.</p> <p>Another of my concerns is that the only people with the time and energy to appeal against refusals relating to the plan will be big businesses who if they succeed will then just take the money out of the Roseland and not put anything back.</p> <p>None of the above means that I think we should welcome all development, it just seems to me the plan is 99% checks and only 1% balances?</p> <p>Please give me a call if any of the above is not clear or confusing!</p> <p>Also, I have stayed away from the plan, given the St Mawes development, I did not want to be accused of hypocrisy, but if you are going to set up any business groups in the future I would be happy to get involved now.</p> <p>28 – Add policy: To protect and preserve the landscape, character and communities of the Roseland the peninsula shall be a nuclear free zone (NFZ) – Note: extract from article by the Guardian's Intelligence expert attached to response.</p> <p>31 - Warmest thanks to the whole Roseland Plan team. We are so lucky to have this astonishingly professional and wide-ranging resource of skilled and committed volunteers. Forget any isolated carping. The vast majority are profoundly grateful.</p> <p>Declaration of the Roseland as a nuclear free zone. I'm aware that the introduction of a completely new policy at this stage would probably involve a further consultation period. It seems to me much more important that the Plan goes to referendum as soon as possible. The negative consequences of delay are much more likely to have a negative effect on the Roseland than the unlikely event of nuclear warheads being positioned off Tolverne.</p> <p>The Roseland Plan is concerned with land use. If any policies can be introduced at this stage without causing delay which</p>	<p>residential or commercial.</p> <p>The affordable housing that the community requires will be delivered by a Community Land Trust.</p> <p>The Roseland Plan supports the formation of a Roseland Business Forum.</p> <p>No change to policies. Professional opinion received from Cornwall Council Planning Department states this issue cannot be included within a neighbourhood plan.</p> <p>No change to policies but thank you for your support.</p> <p>No change to policies. Professional opinion received from Cornwall Council Planning Department states this issue cannot be included within a neighbourhood plan.</p>
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prohibit land use for military infrastructure or similar purposes, so much the better.

38 - The Plan appears to make no mention of the role of the National Trust. It is an important landowner on the Roseland and a keen advocate of landscape protection. Its resources enable it to exert considerable pressure, both as regards planning policy and on individual development applications. It is a major local stakeholder. Is there capacity within the Plan to formalise the relationship between the Roseland community and the National Trust? This may become even more important in the future, when it comes to implementation and enforcement.

39 - A very quick email to say congrats on the Plan. I went to the exhibition and was very impressed by the whole thing. The website also looks great. In particular stunning photos.
I can't hope to comment on every bit of the plan nor can I pretend that I've read every word, but you've done a massive amount of work and have represented views democratically.
The Roseland has a good chance of a sustainable future - as long as Cornwall CC plays its part and supports this neighbourhood plan properly.

40 - The plan is a very comprehensive document, and rightly emphasises the need for more affordable homes and careful management of the environment

It has the overall impression of parochialism.

The Roseland as a special area depends on the leisure industry especially in the summer months, to sustain much of its local industry the year round.. It is in competition with the continent and other parts of the British Isles. Therefore there is a need for the acceptance of accommodation and facilities for visitors, and second home owners who bring a lot of money into the area. These facilities must be carefully managed and kept up to date, and we feel this is not reflected in the document.

There is also the need to be aware of the likelihood of development in the provision of sustainable power. This may well involve the use of tides and waves, which will mean changes to the local seaside and the provision of overhead cables etc. which may be needed by the rest of Cornwall.

Of course the needs of the local residents must be properly considered, sustained and where needed developed. But the Roseland is not an island and is a resource for the rest of the country.

S3 – Fal River - see appended letter (undated).

No change. The National Trust has contributed to production of the Plan. Detail is given in the Consultation Statement.

No change to policies but thank you for your support.

Our community consultation highlighted the importance of tourism to the local economy. The Plan is designed to ensure that our unique tourism offering is sustained.

The sustainable power issue is recognised in the Plan and will be taken forward in our implementation projects.

No change to policies but thank you

SI – CAA - see appended letter dated 24 July 2014.

S8 – The Nare Hotel - see appended email dated 13 September 2014.

NPIERS - A map showing the extent of the AONB & SAC would be helpful. Presentation is good and graphic but it is not clear what the different colour coded boxes mean. Need to explain the colour coding and make it more simple.

for your support.
The Roseland Plan supports the formation of a Roseland Business Forum.

Refer to Cornwall Council Planning Department. Agreed that no change required.

No change to policies but thank you for your support.

We note the comment regarding 'appropriate representation' and can advise that the Steering Group is made up of Parish Councillors and members of the local community including several from the business community. ALL Steering Group meetings are widely advertised as being open to the public.

We have made every effort to engage with all sections of the community including businesses and the professional guidance we have sought has indicated that we have consulted appropriately.

Yes, maps will be included. The "colour coding" is there only for presentation purposes.

S11 - Gerrans Parish Council - Outreach - The Council proposed that in future, as the Plan continues to be reviewed and more consultations held, more effort could be made to increase the use of digital media in addition to paper communications as a way of engaging a broader demographic, and in particular the younger generation.

Councillors also expressed their appreciation of the hard work, skill and dedication of all those involved in the development of the Plan to date.

47 - Does employment locally come into a separate plan?

33b - I thought I should forward this to you, though I expect you will see it anyway, and make the point that this is an overwhelmingly significant change in the very framework within which local development can be discussed. And yet, as I understand it, the Plan is currently "locked".

It seems to me quite inappropriate that this should be so since the whole context within which peoples' submissions were made has now dramatically changed.

In these circumstances, I hope that the Steering Committee can take the lead in seeking residents' views.

Following recent press coverage of potential relocation of nuclear facilities from Faslane to the Fal, I am compelled to ADD A POLICY to my previous submission, viz. TO PROTECT AND PRESERVE THE LANDSCAPE AND COMMUNITIES OF THE ROSELAND THE WHOLE PENINSULA SHALL BE A NUCLEAR FREE ZONE.

Quite apart from risks of accident, etc., the drastic changes that will be required to local infrastructure, including highly defended security zones for the protection of such installations, would severely affect the character of this part of Cornwall (either side of the Fal, in fact) and would strike at the heart of the tourism on which so many local livelihoods depend.

44 - I know that it is difficult to find ways to limit the numbers of local homes and new open market houses, which come up for sale and are bought and become second or holiday homes and to include anything about this in the plan. However as the article from the Guardian dated 10/07/14 recorded there are other rural areas of the country which are experiencing

No change to policies but thank you for your support. We feel we adequately addressed the concerns re: digital media and developed multiple means of digital communication e.g. Facebook, dedicated website, email contact list and newsletter and we have used Roseland Online.

No separate Plan, but employment has been considered within the Roseland Neighbourhood Plan. No change to policies. Professional opinion received from Cornwall Council Planning Department states this issue cannot be included within a neighbourhood plan.

This matter will be discussed with Cornwall Council. The Council are happy for us to include a Policy on

the same problems. Some of these areas are trying to do something to rectify the problems using the Sustainable Communities act 2007. So I would like to suggest that, although we may not be able to include anything legal in the NP, we should pursue this as one of the projects after the NP is completed because I believe it is an issue cited by many respondents to the survey and commented on during the consultation period so hopefully if we contact other areas and find out what we can do together maybe we can overcome these housing issues.

46 - Implications of the LLCA

I am not sure that the Plan has fully drawn on the information in the LLCA to strengthen its policies. There are several recommendations in Chapter 4 about land management and development which could be specifically mentioned in policy preambles or maybe even policies themselves. In addition might there be any scope to:

1. List the community's nomination of specific "special places and views" somewhere in the Plan itself?
2. Provide any sanctions or disincentives within the Plan to prevent people from unilaterally damaging aspects of the landscape or waterscape outside of the planning system (e.g. destruction of Cornish hedges, traditional gateposts, removal of trees, nutrient, slurry and sewage run off into rivers threatening mussel and oyster fisheries etc.)?

S10 - English Heritage - Having gone through the document we are very impressed that the community values every aspect of its natural and man-made landscape and that the conservation of this and village character should be at the core of the Plan's objectives. This is explicitly expressed in the Vision which seeks to Conserve and Enhance the Roseland's Character and Distinctiveness for a Sustainable Future.

We also note positively how a landscape character assessment, development management toolkit, parish character assessments and relevant sections of the Carrick Design Guide have informed the formulation of policies and will be used to guide the management of change. Much consideration and detail has clearly gone into the suite of proposed policies which provides a coordinated and comprehensive framework for protecting the area's distinctive heritage while allowing change necessary to sustain it and its community.

We therefore have little specific comment to offer and are happy to defer general consideration of the Plan's conformity with parent local plan policy and the National Planning Policy Framework to Cornwall Council. Our only thoughts relate to:

- in its conservation policy referencing to undesignated heritage assets given that it values all aspects of the area's distinctive character;
- Whether it wishes to give specific thought to pro-active measures for tackling heritage issues in the area, be they

this topic and see what response we get from the Examiner. The Sustainable Communities Act can be mentioned in the context of later project work.

No change to the document as feel adequately covered by existing policies.

No change to policies but thank you for your support.

We shall be looking at the issues raised within the Conservation Area Management Plans and the Roseland Design Guide and will add to the list of potential projects.

Regarding undesignated heritage assets.... These could be captured in an Appendix to the Roseland Design Guide and Conservation Area

Heritage Assets At Risk or opportunities for enhancement.

- How Community Infrastructure Levy contributions might be used to address either of the points referred to above. Otherwise, please accept our congratulations on your Plan!

S2 - Sport England - Planning Policy in the National Planning Policy Framework identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process and providing enough sports facilities of the right quality and type and in the right places is vital to achieving this aim. This means positive planning for sport, protection from unnecessary loss of sports facilities and an integrated approach to providing new housing and employment land and community facilities provision is important.

It is important therefore that the Neighbourhood Plan reflects national policy for sport as set out in the above document with particular reference to Pars 73 and 74 to ensure proposals comply with National Planning Policy. It is also important to be aware of Sport England's role in protecting playing fields and the presumption against the loss of playing fields (see link below), as set out in our national guide, 'A Sporting Future for the Playing Fields of England – Planning Policy Statement'.

<http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/playing-field-land/>

Sport England provides guidance on developing policy for sport and further information can be found following the link below:

<http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/>

Sport England works with Local Authorities to ensure Local Plan policy is underpinned by robust and up to date assessments and strategies for indoor and outdoor sports delivery. If local authorities have prepared a Playing Pitch Strategy or other indoor/outdoor sports strategy it will be important that the Neighbourhood Plan reflects the recommendations set out in that document and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support the delivery of those recommendations.

<http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/>

If new sports facilities are being proposed Sport England recommend you ensure such facilities are fit for purpose and

Management Plan.

Existing facilities for sport are protected and contribution to new facilities provided for under policies SF2 and SF4. In addition, facilities for any new development will be considered in the Roseland Design Guide.

designed in accordance with our design guidance notes.

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

49 - Although the Plan should be user friendly it is a legal document and it should be permissive not restrictive. In my view a readable font is required. There are so many capital letters and so many boxes and colours. Photographs are unnecessary and the plan should be as short as possible to encourage printing it off and its use. Surely words are required not pictures.

The Neighbourhood Plan has been a huge task. In my humble view the Neighbourhood plan does repeat itself often and paragraphs could be moved and jointed up with others and the Planning Officer will be aware of the other legislation to be taken into consideration without it being repeated in the Neighbourhood Plan. One of the appendices has an error and it is too expensive to run off with so many photographs. I am assuming the final Plan will be slimmed down and material relating to accountability archived.

For employment please see the granting of permission or consent:

- i. To conserve, preserve and protect landscape and scenic beauty in the Area of Outstanding Natural Beauty by granting planning permission for development in these designated areas in exceptional circumstances and where it can be demonstrated the proposed development is in the community's interest creating jobs for local people in the community/parish or an exception may be made for new dwellings for rural workers with strong local connections where there is a need.
- ii. To conserve, preserve and maintain sites of Special Scientific Interest, areas of Great Scientific Value and Scheduled Monuments by granting planning permission for development in these designated areas only in exceptional circumstances and where it can be demonstrated the proposed development is in the community's interest creating jobs for local people and using local materials for stone wall and slate roofs and does not affect views from scheduled monuments.
- iii. To conserve, preserve and protect Local Green Space, common land, designated heritage assets including conservation areas and listed buildings; and locations at risk of flooding or coastal erosion or of high landscape value by granting planning permission for major or small developments in these designated areas only in exceptional circumstances and where it can be demonstrated the proposed development is in the interest of the community and creates jobs for local people in the community and local materials for stone walls and slate roofs will be used and windows will be kept small and there will be garden space and views of the landscape will not be adversely affected by the proposed major development and to ensure flood risk is not increased by development or increased elsewhere and only consider development in areas at risk of flooding where flood risk assessment has been produced.
- iv. Conserve heritage assets in a manner appropriate to their significance within the Parish boundary so that they reflect the identity of local surroundings and materials and can be enjoyed for their contribution to the quality of life of this and future

No change to the presentation style of the documents but small changes are being made to the Plan following the consultation feedback including (possibly) dividing the document into 2 parts to enable the Policy section to be printed separately. Points i to viii and x are already part of the Plan and point ix will be covered by the Design Guide.

generations.

v. Conserve non heritage assets and control new build in a manner appropriate to their surroundings and neighbouring buildings. Should reflect local need and include affordable housing. Affordable housing applicants given preference if they fall into the categories set out in H06 page 43. For example windows should be small and not be of large sections of plate glass, roofs and materials of local stone and slate will achieve sustainable visual appearance and integration. Dormer windows and skylights are mostly unknown in non-heritage assets and are creeping into new build or extension and should only be introduced with great care and consideration in order to sustain the character of the non-heritage assets and those around in the community/parish.

vi. To ensure proposals for any development on or affecting protected wildlife or geodiversity sites or landscape ANOB areas consideration to be given to preservation of these sites and enhancement commensurate with their status and the contribution that they make and planning permission should only be granted for major developments in these designated areas in exceptional circumstances and where it can be demonstrated they are not only in the community's best interest but in the public interest as well.

vii. Annexes for relations or the disabled to be conditioned by the planning officer

viii. Where an application is likely to have significant adverse impact on one or more of the above factors, it should be not be granted.

ix. Veryan and Portloe and other hamlets have just disappeared in the neighbourhood plan I am viewing. How is the planning officer to know what people wish to be taken into account during the decision making process if their wishes are not spelled out as to what they might approve of, the materials to be used and what they wish the building to look like rather than relying on 283 pages of Cornwall Council design attached to the plan. In my view that local stone and slate should be used, windows should be small, porches are formed inside the building, permitted development rights should not be allowed in Veryan Parish, dormer windows and skylights are alien to Veryan Parish and should be granted only in exceptional circumstances. Wooden framed extensions are not acceptable to Veryan Parish Councillors nor is development in the flood plain or development which would affect the flood plain, Councillors do not approve of large panes of glass and Juliet balconies and I am sure would not approve of burglar alarms for lighting that could affect ships out at sea. These should be included in the plan to inform the Planning officers.

x To seek to control new build becoming a holiday home to be let commercially to condition the dwelling so that it cannot be let as a holiday home and ensure conditions that a holiday home if approved remains a holiday home are complied with.

43 - A PROPOSAL TO IMPROVE THE QUALITY OF THE LIVES OF THE RESIDENTS OF PORTLOE – a 4 page document attached to submission 43 and dated August 2014. Accompanying email states:

- i. The infrastructure is in place for the bus to include the "Portloe loop" again as the loop plays an economic role by transporting people in and out to access jobs, enables a mixture of housing to be constructed above Treviskey Hill (land appears despoiled and degraded by a tip Policy 22 Cornwall Council Emerging Local Plan) or below Treviskey

No change to policies as not land use issue but matter will be referred to relevant authorities.

<p>Hill, students to go in and out for education, those without cars to access surgeries, bank, library, shops and generally be able to sustain their lives at home in Portloe as well as those who take the bus to free up car parking for others in Truro. One bus may take the place of several cars thereby reducing fumes polluting the atmosphere.</p> <ol style="list-style-type: none"> 2. The proposal seeks to control delivering and unloading or loading at the time a bus is due to pass and is intended to keep the bus moving and running to its timetable. 3. The bus therefore plays an economic, social and environmental role. 4. The weight restriction project within the Proposal plays a social and environmental role. 5. This proposed project should enable Cornwall Council and/or the Government or European Parliament to seek further information from the writer and to provide sufficient funding for the legal agreement and signs and annual grant required. <p>S12 - Cornwall AONB - The Cornwall Area of Outstanding Natural Beauty (AONB) Partnership supports the policies set down in The Roseland Plan Consultation Draft. The approach to the protection of the Cornwall AONB is welcomed in that it attaches appropriate value to the conservation and enhancement of the designated landscape and its setting. Within the Plan are embedded a Vision, Objectives and policies that will enable the AONB to have the appropriate level of local protection when development proposals are determined in the Roseland in the future.</p> <p>S13 - Natural England - We advise you that we disagree with the conclusion of the Cornwall Local Plan that there would be no Likely Significant Effect due to recreational boating in the Fal Estuary effecting the qualifying features of the SAC . This issue will need to be addressed in the Cornwall Local Plan and mitigation agreed in the higher level plan. Whilst the Neighbour Plan proposes containing any additional development within the settlement boundaries, we need to be mindful when considering the Neighbourhood Plan in –combination with other Plans. This includes the exceptions regarding affordable housing supported by market housing in the Local Plan Policy 3 and the overall CNA distribution of a total of 3 900 dwellings with 900 houses outside Truro, a significant proportion of these destined for settlements within the Neighbourhood Plan area.</p>	<p>No change to the document. Thank you for your support.</p> <p>Discussed with Cornwall Council, who met Natural England for clarification and resolution. Our responses are given below in the Page-by-Page section (Pages 28, 32 and 41).</p>
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1.2 AFFORDABLE HOUSING	PROPOSED ACTION & RATIONALE
<p>4 - I have read through several indices full of complaints about lack of affordable houses. The problem is that there is little work or activity on the Roseland outside of tourism and accompanying building work of which there is a lot esp. Cathedral Builders of Truro and farming. No builder is going to build loads of affordable housing - whatever affordable means - because it is unaffordable to do so. People do not have a God given right to live exactly where they grew up and indeed</p>	<p>Comments noted but as no action is proposed there will be no change to policies.</p>

many, many successful Cornish people like people from all over Britain are working all over the world. There is simply not the activity in the Roseland and if suddenly it were to become "urbanised" then the same people would complain. Second home owners have saved many listed buildings which would otherwise have fallen into disrepair. So strict are the rules concerning conservation that older, local people have been forced to sell their homes as they cannot afford the repairs needed to the standards demanded. Tiny Roseland villages and hamlets have no bus services nor libraries nor is there much choice over shopping. To people looking for a quiet holiday that is excellent but probably not suitable for young families who are also looking for schools and travel links to Truro or Falmouth. The complaints raised would find an echo in villages in Surrey, Wiltshire, Dorset or anywhere else. The key to this is education because the future for Britain is highly specialised work which pays well - it is no use thinking that unskilled rural work will come back. Tree cutting and hedging and driving farm machinery are skilled work today requiring proper certification just as would be needed in financial services, aviation, oil industry or any other sphere of activity. Get real Roselanders!

18 – There is no sheltered housing for older people and probably older people occupying the large family home. Could we include somewhere – Encourage the building of smaller affordable homes/flats for the elderly. To release larger houses for local people.

27 – Could you please define the word “affordable”? It is only affordable if families/couples have a supporting infrastructure – work to provide income, transport (Cars – carbon emissions?) schools, utilities – drainage, sewerage etc. This goes beyond providing houses for people to occupy and leaving it at that!

34 - Proposed new definitions -

“Affordable Housing: housing which is-

- a) social housing, affordable rented housing or shared ownership housing,
- b) provided in accordance with established local need in the Plan Area not met by the housing market,
- c) made available at a cost which has regard to affordability in relation to local incomes, and
- d) [occupied for at least 270 days per year as a Full Time Principal Residence,]

and which, in order to ensure that the housing continues to be occupied in accordance with established local need and

No change to policies. These concerns will be considered within the implementation project for affordable housing. We will add words to the Plan about getting the mix of house size right and encourage mobility but will also use the phrase 'lifetime housing'. Explanatory words will be added to the relevant pages defining the term 'affordable housing'. Explanatory words will be added to the relevant pages defining the term 'affordable housing'.

<p>at an affordable price, has its first and future occupation controlled and managed by a Roseland-based Community Land Trust, by Cornwall Housing Ltd, or by a registered provider of social housing or other bona fide social housing provider.</p> <p>The conditions by which housing qualifies as affordable housing must be included in legally enforceable provisions imposed on the ownership of the housing and/or through the planning process.”</p> <p><i>Comment: This definition is an aggregation of various references to Affordable Housing in the Policies. I have added a suggestion that the full-time occupancy requirement should apply: it would for instance prevent social housing being used as a second home or let or sub-let as a holiday rental, and appears to be a logical implementation of the desire to reduce second homes on the Roseland while also helping to ensure that affordable housing can be made best use of.</i></p>	
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1.3 MEDICAL SERVICES	PROPOSED ACTION & RATIONALE
<p>14 - 24/7/365 Medical Emergency and Care in the Roseland</p> <p>On Carnival day, we had a sudden emergency with a daughter who suddenly collapsed a couple of times on pavement above Summers Beach. Son in law rang the emergency numbers. Gave our address at 4 Tredenham Rd, St M. Hundreds of visitors about all along the waterfronts. Got duty thru to emergency respondent. And was immediately given next available nearest see a doctor on duty appointment for the whole area of Roseland etc. He was sent to an appointment in REDRUTH. None available nearer, now even in Truro or Falmouth let alone here in Roseland</p> <p>He got her in his car, and took her all the way as directed to the REDRUTH appointment which involved going over the King Harry Ferry as well</p> <p>I was so shocked by this that I ran down to your stall by the Pharmacy where I relayed all the detail I knew to the chap in charge. I think he was as shocked as I was, and still am and as is our entire family. Luckily she survived and is now on suitable medical care etc. back home near Winchester</p> <p>Quite clearly we in Roseland should as matter of absolute priority and within our Plan, think thru and put in place a system of immediate access Medicare that is on duty and available 24/7/365 p.a and is on site anywhere in Roseland within say 10 minutes max of receiving call.</p>	<p>No change to policies. Not a land use issue. Matter will be referred to the Roseland Surgeries.</p>

<p>How to achieve this Life Saving medical service. Presumably we could talk with local NHS services and see what they can really offer. Based on that, which would probably be somewhat limited and could not meet our needs, surely we could investigate how that can be supplemented by a private add on service. Perhaps that could be paid for in two ways. First a basic annual or monthly down payment which gets the basic service in place and maybe which gets enlarged in high seasons and minimised in low seasons and which is supplemented by a reasonable add on Call Out Charge each time the service in emergency call out activated.</p> <p>Who would pay? Maybe done by a suitable mix of grant towards the basic provision, with voluntary prepaid funds to extend it in high seasons and even a voluntary local Vat type Roseland health Tax that visitors pay for when using ferries, restaurants, car parks or whatever. Properly thought thru I feel pretty certain that it could with intelligent enthusiasm be worked out. I see absolutely no reason that it shouldn't be worked out and operated rather on the same principal as our local Coastguards and the RNLI is.</p> <p>Everyone in Roseland, including all our Visitors, residents, young and old would benefit and one of the greatest life safety weaknesses to being in Roseland would be turned into a great strength.</p>	
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1.4 PARKING	PROPOSED ACTION & RATIONALE
<p>17 - Problem with parking for the Hidden Hut in summer. Parking at the public car park on 'this side' of Portscatho is very visible intrusion into the landscape...but can't get it moved now. Heard that the NT has been considering giving up more cliff space (field on left hand side as you go from Rosevine towards the beach. Hope that this is not the case as it would again be a visual eyesore. If more car parking is needed, couldn't it be behind the Hidden Hut?</p>	<p>Wording on Parking Policy being improved and parking will be included in brief for Roseland Design Guide. Specific matter to be forwarded to Parish Council.</p>

1.5 SERVICES	PROPOSED ACTION & RATIONALE
<p>16 - Finally, it would be nice to find some way of including a reference to our old favourite, the loss of or reduction to the mobile library service, not, in this instance as a way of borrowing books, but as a community amenity, encouraging people to leave home and meet people, sharing thoughts on books, life, the universe and everything!</p>	<p>No change to policies. Not a land use issue. Initiatives are being taken by Cornwall Council and the Parish</p>

	Councils to create community libraries.
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1.6 TRANSPORT	PROPOSED ACTION & RATIONALE
<p>16 - Pages 12, 13 and 21 - we are very concerned about the decrease in the frequency of buses to and from Truro and the timing of the last buses each day, meaning it is no longer possible to make an evening visit to the cinema, theatre etc. without a taxi home.</p> <p>4 - It was noticeable on one survey that 50% wanted buses; the other 50% were not interested.</p>	<p>No change to policies. Not a land use issue. Parish Councils are already aware.</p> <p>No change to policies. Not a land use issue. Parish Councils are already aware.</p>

PART 2 - COMMENTS - PAGE-BY-PAGE

PAGE 2	PROPOSED ACTION & RATIONALE
<p>45 - Photo of single individual still in. What significance?</p>	<p>No change to the document as it is felt the picture portfolio is reasonably balanced.</p>

PAGE 4	PROPOSED ACTION & RATIONALE
<p>19 - Here and elsewhere the following sentence is included; “Underpin the tourist, agriculture and service industries by protecting the natural beauty of the AONB...” How does protecting the natural environment underpin service industries? “A balanced approach to carbon reduction/ energy efficiency.” Add /energy production.</p>	<p>Wherever the words 'service industries' appear in the document they will be changed to 'related service industries'. 'Energy</p>

31 - Summary line 4 'live in, work in or visit the area'.	production' will be added where applicable. Adopted.
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PAGE 5	PROPOSED ACTION & RATIONALE
NPIERS - Presume the area of the plan has been formally designated as the Local Authority has been closely involved. However there is no direct reference to this in the Draft Plan. There is a need to check this has been done for absolute certainty otherwise the plan is not valid.	The relevant reference for formal designation will be added to page 5.

PAGE 6	PROPOSED ACTION & RATIONALE
<p>49 - A3 Limitations: My view is that a presumption in favour of sustainable development to meet the development needs of its area or Veryan the Neighbourhood Plan is intended to identify and make policies in respect of: economic, social and environmental development by ensuring that sufficient land is available in the right place and can support growth and enhance and improve our community/parish. However, planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise and the development plan includes neighbourhood plans. Neighbourhood Plans or The Veryan Neighbourhood Plan will become a statutory tool to be used by Planning Officers. The Veryan Parish Councillors have complained for years that planning officers do not take account of their views and this document is a legal document and a look at the councillors refusal reasons would assist in the making of this neighbourhood plan because the councillors are speaking on behalf of those in the community and the fact Veryan Councillors do not approve of large glass windows, wooden extensions, light pollution, too many holiday homes, parking are some points to be addressed so that planning officers are aware of what is approved within the area. A look through Veryan Parish Council's objections would assist.</p> <p>A3 Photographs here and throughout do not assist. An officer visits the site and will know the area. Photographs and colour just push up the cost of printing the document and should be avoided if officers are to be encouraged to use the plan.</p>	The adopted Carrick Design Guide and emerging Roseland Design Guide will give Parish Councils the tools they need to ensure their views are heard.

PAGE 7	PROPOSED ACTION & RATIONALE
<p>26 – B4 At the moment St Just is <u>not</u> a Conservation Area. We would very much like to see this adopted as part of the Plan.</p> <p>35 - Reword second paragraph</p> <div data-bbox="152 485 1397 580" style="border: 1px solid black; padding: 5px;"> <p>Elsewheres Settlement is sparsely distributed across the area which is dotted with small farm-steads and medieval farm hamlets, many with the prefix 'Tre', indicating their medieval origins.</p> </div> <p>Reword last sentence third paragraph</p> <div data-bbox="152 655 1344 722" style="border: 1px solid black; padding: 5px;"> <p>Most of the Roseland is part of a designated Area of Outstanding Natural Beauty</p> </div> <p>49 - B4 - It is good to have accountability. In my view, however, lacking either in the body of the plan or appendices is a note or footnote that the legal requirements necessary to designate a Neighbourhood Planning Area of 5 parishes has been met. That these requirements have been satisfied should have been recorded or annexed as appendix at this draft stage. The writer has attended many meeting and has no agenda or Minute recording the Councillors have discussed forming an area or voted so to do for Veryan Parish Council and instructing the clerk to follow the legal requirements for notification.</p> <p>B5 - What makes the Roseland so special? In my view it is no more special that many other parts of the United Kingdom and this really has no part in the plan. It is so long but perhaps many parts are intended to be removed for the final plan to be of use to a planning officer.</p>	<p>This will be considered in the implementation project on Conservation Area Management Plans and the emerging Roseland Design Guide.</p> <p>First amendment adopted.</p> <p>Second matter. we will reword as 'The Roseland is part of a designated Area of Outstanding Natural Beauty'.</p> <p>The relevant reference for formal designation will be added to page 5. Following the consultation feedback the Plan document may be divided into 2 parts to enable the Policy section to be printed separately.</p>

PAGE 8	PROPOSED ACTION & RATIONALE
<p>19 - Was there a tide mill at Penpol on the Roseland?</p> <p>I would like to see more under heritage highlights e.g. ancient scheduled monuments, stiles, finger posts and milestones, the Round houses, although I appreciate the title is “highlights”.</p>	<p>Citing Penpol was an error. There were tide mills at Polingey and Froe. More ‘heritage highlights’ will be incorporated.</p>

PAGE 9	PROPOSED ACTION & RATIONALE
<p>8 – C. Input from the community – I continue to disagree with your policy that ‘there was only one method of communication that could guarantee to reach everyone on the Roseland’. As founder editor of Roseland Online, which enjoys up to 2500 readers a day, digital communication was too easily dismissed here because the people on the panel who made those decisions were limited in their knowledge of how this could be successfully achieved. For this reason I strongly believe you have alienated and failed a large proportion of the younger community – those who will most benefit from and inherit these policies. Using a paper form, you asked people how they would like to be communicated to. It stands to reason, then, that those filling out that form would prefer that style of communication. In this I believe you have failed in trying to reach that younger element who may have responded to an online survey much more readily. When I publically objected to this in the past you said that there was no true or safe way of knowing who would fill out online surveys and I said then you were wrong and offered advice to the panel’s understanding of this. That help was not sought. For this reason I feel this survey is seriously flawed and without legitimate merit. I also believe that more than ‘one method’ should have been considered.</p> <p>49 - C - All of C is accountability and has no part in a plan for the planning officers and the councillors.</p>	<p>No change to policies. We feel we adequately addressed these concerns and developed multiple means of digital communication e.g. Facebook, dedicated website, email contact list and newsletter, in addition to use of Roseland Magazine and Roseland Online. The 30% response rate for our Questionnaire is excellent. Considerable detail about the procedures and routes used are given in the Consultation Statement. Following the consultation feedback the Plan document will be divided into 2 parts to enable the Policy section to be printed separately.</p>

PAGE 10	PROPOSED ACTION & RATIONALE
<p>19 - I think it would be useful to put a bit more on how we engaged key local organisations as I expect the Inspector will pick up on the 14 replies, so we should evidence what we did to improve this.</p>	<p>Page will be amended to refer to the Consultation Statement which will include full details.</p>

PAGE 15	PROPOSED ACTION & RATIONALE
<p>31 - D. Planning context line 2 'are not produced, nor do they operate, in a vacuum'.</p> <p>NPIERS - D8.1 -Need further reference to the lesser status of the ECLP The screening opinion is being consulted upon and current view is that an SEA may not be required. In any event the final screening opinion needs to form an appendix to the Plan. In the event an SEA is required there is a need for a scoping report, analysis of policy options and a further round of public consultation in accordance with the Neighbourhood Planning (General) Regulations 2012</p> <p>The screening process is underway but it is understood Cornwall Council disagree with Natural England that an HRA is required. Cornwall Council consider that as an HRA is being carried out on the emerging Cornwall Local Plan in view of the limited development proposed in the RNDP there is no requirement. A legal opinion is being sought by Cornwall and this matter should be resolved before the Plan is submitted to the LPA. In the event an HRA is required there is a need for a scoping report, analysis of policy options and a further round of public consultation in accordance with the Neighbourhood Planning (General) Regulations 2012.</p> <p>49 - D - A planning officer has a duty to take on board the ANOB. D is excessive and surely not necessary. Again the photographs will not assist a planning officer make a decision and just run up the cost of anyone printing the plan.</p>	<p>Adopted.</p> <p>D8.1 – refer to Cornwall Council Planning Dept. Changes made to policies LA4, CV5 and HO5 deleted.</p> <p>This part of the document provides the general public with the context for the policies.</p>

PAGE 17	PROPOSED ACTION & RATIONALE
<p>49 - E.9.1 - Passion has little to do with economic, social or environmental development.</p> <p>35 - The diagram does not make reference to Services and Facilities and these should be referred to under Securing the Future and in the accompanying text.</p> <p>S9 - CAD Architects - THE CORE OF THE ROSELAND PLAN The diagram under the above heading finishes with the words “a positive sustainable future for The Roseland”. From our study of the plan we would dispute the above statement. Our over-riding view is that the plan seeks to retain the</p>	<p>No change to the document as the comment expresses a personal opinion.</p> <p>'Related' added before 'Services' in the document.</p> <p>No change to the document. The Plan reflects the wishes of the local</p>

<p>status quo by severely restricting all development in the hope that no change will take place. There is a lack of planning for growth. All communities must grow, both for their own benefit and continued vitality and as part of Cornwall Council's need to accommodate a 5 year land supply. The success of The Roseland is a result of continued renewal both through the renewal of buildings and the arrival of new people, be they permanent, on holiday or second home owners. Without this vibrancy The Roseland would become a retirement dormitory, doomed to stagnation and decline. In the following comments (in orange built points) we set out our view of the elements of the plan which seek to control the built environment.</p> <p>S12 - Cornwall AONB - We are pleased to note, and fully support the central role of the landscape/seascape/ natural beauty to the requirement for a sustainable future for Roseland 'The Character and Distinctiveness of The Roseland'.</p>	<p>community and is in conformity with Cornwall Council's general approach to rural development.</p> <p>No change to the document. Thank you for your support.</p>
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PAGE 18	PROPOSED ACTION & RATIONALE
<p>S9 - CAD Architects - E9.3 Objectives Landscape – to define and “protect” Character of Villages and Hamlets – to “define” and sustain the distinctive character of each of the Roseland's villages and hamlets.</p> <p>NPIERS - E9.3 -General Principles for Development – should refer generally to all forms of development not just those specified. It is inconsistent with the design policies which refer to all forms of development.</p> <p>46- HOUSING - Objective to support measures to increase the proportion of housing occupied by full time</p>	<p>Following consultation feedback the word 'protect' will change to 'conserve'. The word 'define' does not imply a restriction. Both NPPF and ECLP encourage the definition of local character and distinctiveness. This will be done by adopting the Carrick Design Guide in the short term and will be further developed in the Roseland Design Guide. Wherever applicable in the document the phrase will be changed to '... which apply for all forms of development'</p> <p>This matter was discussed with Cornwall Council. The advice was</p>

residents

INCREASING THE PROPORTION OF FULL TIME RESIDENTS

Whilst the Plan has tried to identify ways to achieve this objective on behalf of the community, it has found that most options suggested meet barriers from either Cornwall Council or current Government legislation. They seem to threaten human rights, limit the workings of the market or are deemed to be impossible to implement.

The intention behind this objective is to help sustain the local community. In this instance, the balance of power in assessing sustainability seems to lie with protecting the rights of potential new second home owners and the open housing market. Taken beyond a certain “tipping point”, this leads in certain areas to an imbalance of benefit between full time residents and empty homes. The recognition of the real need to sustain the social fabric of our local communities and the related viability of their services and facilities has to be fought for. Currently the Government seems to pay lip service to this aspect of social sustainability. We should not allow this issue to be brushed aside by the Council and the Government just because it is difficult to find workable solutions. The remainder of the resident community also have rights. As Andrew George has recently suggested there is a lack of political will to face up to this issue.

There seem to be a number of ways forward:

1. Look again at some of the suggestions made by the community in the original consultations to see if any might have merit.
2. Look more closely at the idea of quotas in specified areas where the proportion of houses reaches a certain upper limit. There is evidence from Wales and Switzerland that this is perfectly feasible to implement.
3. Organise to make an application under the Sustainable Communities Act 2007. This Act gives communities the right to demand that the Government change legislation which prevents the community from achieving its objectives. This little known legislation is currently being used by the South Lakeland Council to challenge the Government to remove some of the hurdles that exist to tackling instances where a conflict arises between the principle of an open market in second homes and the need to sustain the social and economic fabric of a local community. Sarah Newton, our MP, is on record as being keen to help communities with such applications.
4. Try to find ways to “nudge” local estate agents to change the way that they market the Roseland to outsiders away from a “second home/holiday destination” and towards a “desirable place to live full time, work and bring up a family”. The arrival of Superfast broadband in particular makes this latter approach a real option. There is evidence from the Cornwall Development Company that they have a queue of people in just this category. We might do well to try to attract this potential rather than leave it to estate agents alone.

to leave the Plan as it is, ie to wait for the response of the Examiner.

49 - E.9.3. A plan identifying economic, social and environmental development as required should ensure that sufficient land is available in the right place to support growth and enhance and improve the area and not harm the landscape. So as to not harm I propose the Plan should include for example:-

- i. To conserve, preserve and protect landscape and scenic beauty in the Area of Outstanding Natural Beauty by granting planning permission for development in these designated areas in exceptional circumstances and where it can be demonstrated the proposed development is in the community's interest creating jobs for local people in the community/parish or an exception may be made for new dwellings for rural workers with strong local connections where there is a need.
- ii. To conserve, preserve and maintain sites of Special Scientific Interest, areas of Great Scientific Value and Scheduled Monuments by granting planning permission for development in these designated areas only in exceptional circumstances and where it can be demonstrated the proposed development is in the community's interest creating jobs for local people and using local materials for stone wall and slate roofs and does not affect views from scheduled monuments.
- iii. To conserve, preserve and protect Local Green Space, common land, designated heritage assets including conservation areas and listed buildings; and locations at risk of flooding or coastal erosion or of high landscape value by granting planning permission for major or small developments in these designated areas only in exceptional circumstances and where it can be demonstrated the proposed development is in the interest of the community and creates jobs for local people in the community and local materials for stone walls and slate roofs will be used and windows will be kept small and there will be garden space and views of the landscape will not be adversely affected by the proposed major development and to ensure flood risk is not increased by development or increased elsewhere and only consider development in areas at risk of flooding where flood risk assessment has been produced
- iv. Conserve heritage assets in a manner appropriate to their significance within the Parish boundary so that they reflect the identity of local surroundings and materials and can be enjoyed for their contribution to the quality of life of this and future generations.
- v Conserve non heritage assets and control new build in a manner appropriate to their surroundings and neighbouring buildings. Should reflect local need and include affordable housing. Affordable housing applicants given preference if they fall into the categories set out in H06 page 43. For example windows should be small and not be of large sections of plate glass, roofs and materials of local stone and slate will achieve sustainable visual appearance and integration. Dormer windows and skylights are mostly unknown in non-heritage assets and are creeping into new build or extension and should only be introduced with great care and consideration in order to sustain the character of the non-heritage assets and those around in the community/parish.
- vi. To ensure proposals for any development on or affecting protected wildlife or geodiversity sites or landscape ANOB areas consideration to be given to preservation of these sites and enhancement commensurate with their status and the contribution that they make and planning permission should only be granted for major developments in these designated

Points i to viii and x are already part of the Plan and point ix will be covered by the Design Guide.

<p>areas in exceptional circumstances and where it can be demonstrated they are not only in the community's best interest but in the public interest as well.</p> <p>vii. Annexes for relations or the disabled to be conditioned by the planning officer</p> <p>viii. Where an application is likely to have significant adverse impact on one or more of the above factors, it should be not be granted.</p> <p>ix Veryan and Portloe and other hamlets have just disappeared in the neighbourhood plan I am viewing. How is the planning officer to know what people wish to be taken into account during the decision making process if their wishes are not spelled out as to what they might approve of, the materials to be used and what they wish the building to look like rather than relying on 283 pages of Cornwall Council design attached to the plan. In my view that local stone and slate should be used, windows should be small, porches are formed inside the building, permitted development rights should not be allowed in Veryan Parish, dormer windows and skylights are alien to Veryan Parish and should be granted only in exceptional circumstances. Wooden framed extensions are not acceptable to Veryan Parish Councillors nor is development in the flood plain or development which would affect the flood plain, Councillors do not approve of large panes of glass and Juliet balconies and I am sure would not approve of burglar alarms for lighting that could affect ships out at sea. These should be included in the plan to inform the Planning officers.</p> <p>x To seek to control new build becoming a holiday home to be let commercially to condition the dwelling so that it cannot be let as a holiday home and ensure conditions that a holiday home if approved remains a holiday home are complied with.</p> <p>The Plan is not written in stone and can be brought up to date from time to time.</p> <p>S12 - Cornwall AONB - The Objectives that support the 'Vision for the Future of the Roseland' are fully endorsed. In particular those relating to landscape and village character, which have full regard to the local characteristics that provide the South Coast Central section of the Cornwall AONB, of which the Roseland Plan area forms a significant part.</p>	<p>No change to the document. Thank you for your support.</p>
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PAGE 20	PROPOSED ACTION & RATIONALE
<p>35 - There is no explanation (<i>brief reference on pages 26, 47</i>) of what the local economy is and what powers it yet the questionnaire to the community identified the priority of seven factors that sustained the quality of life for the community of which the second, fourth and sixth priorities were economic.</p> <p>Whilst there are references to commercial development there is nothing about what constitutes the local economy, which is wider than commerce, and therefore it can be seen how the policies impact upon it. In the NPPF economic impacts of</p>	<p>A short section on the local economy will be added.</p>

policies are one of the three main considerations of sustainable development and how policy supports and promotes the local economy should be up front along with environmental and social considerations.

Proposal: A short section on the local economy containing:

- an articulation of it, and
- a reference to the role of commercial development in the local economy that is then catered for in policies, and
- a reference to the key benefits to the local economy that the NDP can bring i.e. a viable neighbourhood and the sustainable use of local resources

PAGE 21

19 - Here and elsewhere the following sentence is included; “Underpin the tourist, agriculture and service industries by protecting the natural beauty of the AONB...” How does protecting the natural environment underpin service industries?

“A balanced approach to carbon reduction/ energy efficiency.” Add /energy production

“Support the retention of the existing services valued by the community.” What does this mean in planning terms and the planning implications; for example not allowing the conversion of shops, pubs? Importantly though the plan cannot effect services which are not delivered with a land use planning aspect, such as the mobile library service.

25 – E10.1 Support the retention of the existing services... This “objective” doesn’t have any bullet points unlike the ones above. Is this an oversight? A series of sub-objectives are shown under G14 on page 33

35 - amend the second strategy as below to

- a) recognise the benefits development brings to the area and
- b) make the statement more objective

Positive management of new development to minimise the impact *and maximise the benefits to* ~~on~~ the landscape and *to the* ~~on~~ ~~cherished~~ Roseland villages and hamlets by:

- ensuring that development would have *benefits to or only neutral* ~~no negative~~ impact on bio-diversity or habitats

PROPOSED ACTION & RATIONALE

Wherever the words 'service industries' appear in the document they will be changed to 'related service industries'
'Energy production' will be added where applicable.

No change to the document - for services refer to policy SF1

No change to the document. This page is only meant to be a short summary of key points of the Plan. To clarify the intention of this page the heading will be changed to: 'E10. A short summary of key points of the Plan'.

No change. We believe that the current wording is clear.

Amend the third strategy to make the objectives achievable.

~~restriction on~~ **restricting** all new ~~open market housing~~ **development** to ~~ensure the dwelling is occupied full time as a principal residence~~ **encourage only permanent residency of new dwellings** to avoid an increase in second homes and holiday lets.

Amend the fifth strategy

Support the retention **and enhancement** of ~~the existing~~ local services, facilities and infrastructure valued by the community.

S9 - CAD Architects - E 10.1 Overall Strategy

Positive management of new development to minimise the impact on the landscape and on cherished Roseland villages and hamlets by:

- The overall strategy statement uses words such as “positive management”, “protect” and “define”, we read these as negative and purposefully restrictive.
- Our overriding impression from reading the plan is that it is designed to prevent change and to preserve not conserve.
- The danger with such a protectionist and limiting plan which fails to actively plan for growth is that it will be challenged. Every successful challenge will weaken the plan and result in less acceptable forms of development.

Settlement Boundaries:

- Are not included in the National Planning Policy Framework (NPPF) nor in the emerging Cornwall Local Plan (eCLP). They may be difficult to defend at Planning Appeal.
- Are arbitrary and overly restrictive. Planning applications must be judged on their individual merits and not against a negative restriction.
- Sole purpose is to freeze development
- The current under provision of housing in the former Carrick District Area and in particular villages is a result of the imposition of settlement boundaries in the former Carrick District Wide Local Plan 1998.
- Failure to plan for development will weaken the plan.

Positive management –
Following consultation feedback the word 'protect' will change to 'conserve'. The word 'define' does not imply a restriction. Both NPPF and ECLP encourage the definition of local character and distinctiveness. This will be done by adopting the Carrick Design Guide in the short term and will be further developed in the Roseland Design Guide.

Settlement boundaries –
We have been advised by Cornwall Council that we need to specify defined settlement boundaries so as then to be able to define infill.

- Planning for expansion of villages is a positive measure, from which great benefit can be derived for the whole community.
- The Roseland Neighbourhood Development Plan must seek to identify areas where development will be acceptable in the villages. The NPPF has a presumption in favour of sustainable development – at para 15 it states *policies in local plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should apply locally.*
- If over the next 15 years just a proportion of the local children now aged 10 and over wish to stay living in their village or hamlet and given the increase in life expectancy and the attractiveness of The Roseland as a place to live, more homes will need to be built. The plan must demonstrate an awareness of the need for future growth. Planned growth should provide a better solution than forced growth.

Design

- Good design is measurable but should not be confused with style which is highly subjective. Reproduction is not a valid yard stick by which to measure the success of a particular design.
- Local distinctiveness is an ever evolving set of principles which respond to time and context. Good design will respond to context without the need to mimic.
- The NPPF at para 60 states *Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles.* This is a strong statement made to allow good design to flourish in a contemporary context, and to prevent Local Authorities insisting on vernacular solutions. To guide the designer it finishes by saying *it is, however proper to seek to promote or reinforce local distinctiveness.* This final sentence is a reminder to designers that all design must respond to its context.
- The use of the former Carrick Design Guide is good. The guide was well conceived and drafted.
- Policy should seek to require designers to demonstrate an understanding of the context by assessment. Good design responds to context in scale, form and materials.

Provision of Housing to meet Local Need:

Occupation:

- There is no precedent for the forced occupation of housing. Such restrictions are most likely contrary to the Human Rights Act and will require national legislation.
- To force occupation will not only change the nature of everyday life on The Roseland but it will further distort the housing market. All un-restricted property will rise dramatically in value as new buildings are no longer available.

Your expectation of continuing growth of houses for non-locals is at odds with the wishes of the community. The Roseland Plan is firmly based on sustainable (for the Roseland) development. We shall be adding a sentence to page 22 relating to the potential future local housing need.

Design –
No change to the document. We welcome the support for the interim measure of adopting the Carrick Design Guide.

Provision of housing –
No change to the document. It is the desire of the community to limit the number of new second homes and holiday lets.

<p>Many sub-standard dwellings that normally would be replaced will come under pressure for significant extension and change and if such change is prevented will lead to a general reduction in the quality of the housing stock.</p> <p>S7 - Environment Agency - A key priority of the Plan is to conserve and enhance the landscape. One part of the strategy to achieve this is to encourage the re-use of redundant and disused buildings, being flexible in allowing a change of use of buildings and to allow infill development within the settlement boundaries. In section E10.1 reference is made to taking account of flood risk when limiting new development outside of the settlement boundaries (exception sites). We welcome consideration of flood risk for these exception sites, however flood risk must also be considered for all development proposals within the settlement boundaries.</p> <p>NPIERS - E10-need to clarify what commercial development is. Does it include industry? Advice refer to Town and Country Planning Use Classes Order 1987 (as amended) definitions.</p> <p>49 - E.10 The fishing industry is missing. The boats use the land as well as the sea and there is scope for more fishermen. A few years ago there must have been 7 full time boats in Portloe now there is one. Bed and breakfast establishments in my view should be included too as they create employment.</p> <p>S12 - Cornwall AONB - E10.1 Overall Strategy box 1 and 2 Embedding into the Overall Strategy the adopted (by Cornwall Council's Cabinet on 16th February 2011) Cornwall Area of Outstanding Natural Beauty (AONB) Management Plan 2011-2016 (and future successor documents) is fully supported and welcomed.</p>	<p>Assessment for flood risk will be required for all new developments and will be incorporated in policy GP4.</p> <p>Refer to Cornwall Council Planning Dept. Advice is to avoid Use Class list as these change frequently.</p> <p>These occupations will be included in short paragraph on local economy to be added on page 20.</p> <p>No change. Thank you for your support.</p>
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PAGE 22	PROPOSED ACTION & RATIONALE
<p>19 - "building on greenfield sites should not be allowed unless all other options have been exhausted, and then only for affordable housing." What are the implications of this, for example if a new surgery is required? How does this relate to the retention of existing services?</p> <p>S9 - CAD Architects - E10.2 Affordable Housing</p> <ul style="list-style-type: none"> Affordable Housing is an issue in all communities and the smaller the community the more difficult the solution. The lack of Government grants to subsidise affordable housing means that cross-subsidy or affordable housing delivered as part of a development is the only realistic route to meeting demand. The solution is not a wall of policy to try and force developers to provide affordable housing, but genuine inventive 	<p>No change to the document as believe any new surgery would need to be built within defined settlement boundaries.</p> <p>No change to the document. The Plan proposes some innovative approaches to providing affordable housing without cross subsidy as</p>

<p>and lateral thinking.</p> <ul style="list-style-type: none"> • The policies contained in the draft plan are a draconian set of restrictions which fail to recognise the absolute need to encourage developers to build houses in order to be able to build affordable homes. • The conversion or sub-division of existing buildings is in our experience impossible to achieve at an affordable level. The costs of conversion coupled with the value of the existing building will almost always outweigh the return. Without direct grant from government even housing associations will not attempt this form of provision. • Developers take huge financial risks when undertaking development as can be witnessed over and over again following the long recession since 2008. Many developers have not only lost their business but also their family home. But without developers there is no growth in communities and no chance (in the current system) for affordable housing. The provision of housing and affordable housing is a delicate balance between fair and equitable provision against commercial return and policy should seek to be flexible enough to accommodate real consultation and collaboration. • Self-Build is one way to provide housing which is affordable to those with some means and ability, to provide themselves with a family home within their community. The plan should seek to establish clear policy on self-build, bearing in mind the huge commitment such self-builders make to realise their home. • The draft plan seeks to limit new development to a maximum of 5 dwellings. Our experience of working with private developers and housing associations shows that anything less than 12 dwellings are not attractive or viable. <p>46 – E10.2 - MILITARY AND GOVERNMENT BUILDINGS</p> <p>The Plan categorises building essentially into Residential and Commercial. I think it would be wise to extend the scope of the “Commercial” designation to read “Commercial, Military and Government Development”</p> <p>E10.2 ref to Rural Exception sites - REFERENCE TO GLOSSARY</p> <p>Need to refer people to the Glossary here as this is the first mention of the term and it comes before the Glossary.</p>	<p>recognised in the emerging Cornwall Local Plan.</p> <p>No change to document as no substantive community support.</p> <p>No change to document. Glossary is clearly available.</p>
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PAGE 23	PROPOSED ACTION & RATIONALE
<p>19 - First bullet point “an indicative maximum size of 5 units” what does indicative mean in this context? How does this help to deliver robust planning policy?</p>	<p>No change to the document. This list is included on the advice of our professional consultants to convey the intention of the Plan.</p>

Second and third bullet points, which has priority? These are potentially contradictory.	Taken over the next 15 years it is anticipated that both the second and third bullet points will apply to some extent.
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PAGE 24	PROPOSED ACTION & RATIONALE
<p>19 - Are we really content with the settlements put forward?</p> <p>35 - Summary of housing and commercial development needs to be reflected more clearly through policies delivering that strategy.</p> <p>49 - Commercial development: There are two luxury commercial hotels of which I find no mention in the Neighbourhood Plan in Veryan Parish. At the moment both fit into the landscape. The design guide favoured by the steering group encourages large scale buildings with large windows and balconies which in my view are not in keeping with the character of the buildings and would not fit into the landscape. It is known that the Nare and Lugger Hotels have balconies added over the years and the Nare has large glass windows but there is nothing in the Plan about extensions to hotels. It seems to me the landscape seen from the scheduled monument Veryan Castle will be affected and its location and views should be addressed in the Neighbourhood Plan. My view is that what I propose for E.9.3 should be cross referenced here to aid the planning officers. There could be more encouragement for IT businesses to relocate to Veryan Parish or the area if approved which would encourage the purchase of homes to live in and create employment.</p>	<p>Agree to review the wording on settlement boundaries throughout the document to clarify the intention.</p> <p>We believe no change is required as already clear.</p> <p>No change to the document. There is general acceptance of the adopted Carrick Design Guide which does not favour large buildings or large windows. Extensions are covered under policy CDI (vi).</p> <p>Re: IT businesses – refer to 3rd para of Introduction on page 47.</p>

PAGE 25	PROPOSED ACTION & RATIONALE
<p>19 - Where the boundary lines have been agreed and drawn up, simply following previous plans. If we are content with Portholland, then why not Philleigh, Ruan Laniorne or Treworga?</p>	<p>We will clarify those settlements with defined boundaries.</p>

S9 - CAD Architects - Settlement Boundaries:

- Are not included in the National Planning Policy Framework (NPPF) nor in the emerging Cornwall Local Plan (eCLP). They may be difficult to defend at Planning Appeal.
- Are arbitrary and overly restrictive. Planning applications must be judged on their individual merits and not against a negative restriction.
- Sole purpose is to freeze development
- The current under provision of housing in the former Carrick District Area and in particular villages is a result of the imposition of settlement boundaries in the former Carrick District Wide Local Plan 1998.
- Failure to plan for development will weaken the plan.
- Planning for expansion of villages is a positive measure, from which great benefit can be derived for the whole community.
- The Roseland Neighbourhood Development Plan must seek to identify areas where development will be acceptable in the villages. The NPPF has a presumption in favour of sustainable development – at para 15 it states *policies in local plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should apply locally.*
- If over the next 15 years just a proportion of the local children now aged 10 and over wish to stay living in their village or hamlet and given the increase in life expectancy and the attractiveness of The Roseland as a place to live, more homes will need to be built. The plan must demonstrate an awareness of the need for future growth. Planned growth should provide a better solution than forced growth.

31 - F11 Glossary: Settlement boundaries section 5 (iii) what does 'significantly and inappropriately extend the built form of the settlement' mean? Needs clarification.

NPIERS - Section F -Suggest short introduction saying that development proposals will be considered in relation to all policies rather than individual policies. This clarifies that balanced judgements will be made and differences in emphasis between policies will be explicitly considered.

Section F-Glossary-

Brownfield land – after “associated fixed infrastructure” add “which is still clearly visible above ground”. This covers the situation where there has been greening over the surface and the infrastructure (hard surfaces) has effectively disappeared. It would be useful to have clear cross references and electronic links to maps showing the settlement boundaries.

We have been advised by Cornwall Council that we do need to define settlement boundaries.

Your expectation of continuing growth of houses for non-locals is at odds with the wishes of the community.

The Roseland Plan is firmly based on sustainable (for the Roseland) development. We shall be adding a sentence to page 22 relating to the potential future local need.

Refer to Cornwall Council Planning Dept for clarification. Advice is that these words are necessary to ensure the correct, compact boundary is drawn.

The 2 Important Notes at present on pages 35 and 37 will be moved to the start of the section of the document containing the policies. Amendment to Meaning of Brownfield Site adopted. Clearer cross referencing is in hand.

PAGE 26	PROPOSED ACTION & RATIONALE
<p>I3 – End of second paragraph of Introduction – ‘A Development Management.....’ – This may be premature if pilot fails to get adopted by county.</p> <p>S5 - National Trust - Policy LA1 is supported, but in relation to objective G12.1 there remains a concern in relation to major development in the AONB, which is mentioned separately in the supporting text to policy GP2 (Design and Character of the Roseland).</p> <p>The National Planning Policy Framework requires exceptional circumstances and public interest tests for major development in such designated areas (NPPF; para 116), but it does not provide a definition of ‘major development’. In some cases extant planning legislation has been cited, with the definition of ‘major development’ provided by Statutory Instrument 2010 No.2184 – <i>The Town and Country Planning (Development Management Procedure) (England) Order 2010</i>. However, recent case law has tended to suggest that the phrase ‘major development’ does not have a uniform meaning in relation to planning regulations, policy or guidance, and that whether a proposal amounts to ‘major development’ in the context of paragraph 116 of the NPPF is a matter of the decision-maker in relation to the specific case. In a recent appeal decision for 14 residential units at Coleford In Gloucestershire, within an AONB, the Inspector had regard to the size of the settlement and the location and extent of development in recent years in determining that it represented major development (APP/P1615/A/13/2204158; dated 23 June 2014).</p> <p><i>The Tamar Valley AONB Management Plan 2014 -2019</i> indicates that the AONB Partnership for the Tamar Valley AONB regard the reference to ‘major development’ in the context of paragraph 116 of the NPPF as differing from the definition set out in the 2010 Town and Country Planning Order, and that they see it as not possible, or appropriate, to apply a blanket definition for what should be treated as major development in the AONB (paragraph 9.9). However, they put forward some key indicators that would suggest when a development is likely to be major in its effect on the landscape.</p> <p>One of the proposed <i>Focused Changes to the Cornwall Local Plan Strategic Policies</i> (September 2014), amends paragraph 2.96 of the Cornwall Local Plan to state that:</p> <p>“<i>The Tamar Valley AONB Management Plan 2014 – 2019, in particular, provides guidance on what constitutes ‘major’ development</i></p>	<p>No change to the document as feel appropriate for the Roseland.</p> <p>After consultation with Cornwall Council and the AONB unit, we will use the approach in the Tamar Valley Management Plan 2014-2019. Their advice is consistent with that of the National Trust, ie to use the Tamar Valley documentation.</p>

within an AONB stating that this will depend on the scale, location and type of development proposed.’

In relation to the Roseland Neighbourhood Plan, whilst the supporting text to Policy GP2 (Design and Character of the Roseland) indicates the communities’ preference is for small scale development on the Roseland generally (“indicative size up to 5 units”), and it makes reference to the NPPF, it would be helpful if there was reference to ‘major development’, in the context of paragraph 116 of the NPPF, under objective G12.1 on the AONB.

One option might be to put forward indicators that would suggest when a development is likely to be major in its effect on the landscape quality, as in the Tamar Valley AONB Management Plan (paragraph 9.9). Alternatively, a case could be made, given the sensitivity of the landscape on the Roseland, that the 2010 Town and Country Planning Order cited above should provide the basis for indicating the thresholds of what might constitute major development, but expressing that in each case regard will be had to the type of development and the site context, and the potential to erode the special qualities and features of the ‘South Coast Central’ section of the AONB. An indication of the presumably small number of planning applications in the AONB on the Roseland, in recent years, for ‘major development’ (as defined by Cornwall Council for development management purposes under the 2010 Order) could be helpful in indicating the extent of development in recent years in supporting a justification.

49 – G - In my view already expressed the Planning Officer makes a site visit, should be aware of the likes and dislikes of the residents of the area through the Neighbourhood Plan and the applicant will also have been made aware by the Plan if included as proposed above.

S12 - Cornwall AONB - Page 26, 27 and 28– Policy LA1 – AONB Management Plan

Section G12.1 – Promoting the protection and enhancement of the Cornwall AONB is supported. Policy LA1 and its supporting text clearly outlines the protection awarded to the South Coast Central section of the Cornwall AONB, which the Roseland Neighbourhood Development Plan area and its setting forms a substantial part. Reference to the guidance in the Cornwall AONB Management Plan and its relevance is welcomed. Specific reference to the policies in the Management Plan that set down criteria for the consideration of development in the protected landscape is supported and welcomed.

No change to the document as this is a personal opinion.

No change to the document. Thank you for your support.

PAGE 27	PROPOSED ACTION & RATIONALE
<p>31 - G. Policies for quality of life - line 10 'concern about cumulative impacts of individual developments...'. This should be more clearly defined and written as a policy item. Vis: 'no individual development will be permitted where it risks having a cumulative impact on the special character of the Roseland, for example where it might set a precedent for similar developments in the surrounding area, so changing the balance between the natural and built environment.'</p> <p>LAI (iii) Does this mean for example that existing buildings adjacent to Pendower Beach cannot be developed, if that development would threaten the area's natural beauty or special features? If so can this be specified?</p> <p>An important issue raised at the meeting was how to protect the undeveloped coast in the likely event of future coastal erosion. Can a policy be introduced or tightened which anticipates such erosion and prevents the installation of sea defences such as the ugly and inappropriate rock armour below the Nare Hotel?</p> <p>S5 - National Trust - Policy LAI is supported, but in relation to objective G12.1 there remains a concern in relation to major development in the AONB, which is mentioned separately in the supporting text to policy GP2 (Design and Character of the Roseland).</p> <p>The National Planning Policy Framework requires exceptional circumstances and public interest tests for major development in such designated areas (NPPF; para 116), but it does not provide a definition of 'major development'. In some cases extant planning legislation has been cited, with the definition of 'major development' provided by Statutory Instrument 2010 No.2184 – <i>The Town and Country Planning (Development Management Procedure) (England) Order 2010</i>. However, recent case law has tended to suggest that the phrase 'major development' does not have a uniform meaning in relation to planning regulations, policy or guidance, and that whether a proposal amounts to 'major development' in the context of paragraph 116 of the NPPF is a matter of the decision-maker in relation to the specific case. In a recent appeal decision for 14 residential units at Coleford In Gloucestershire, within an AONB, the Inspector had regard to the size of the settlement and the location and extent of development in recent years in determining that it represented major development (APP/P1615/A/13/2204158; dated 23 June 2014).</p> <p><i>The Tamar Valley AONB Management Plan 2014 -2019</i> indicates that the AONB Partnership for the Tamar Valley AONB regard the reference to 'major development' in the context of paragraph 116 of the NPPF as differing from the definition set out in the 2010 Town and Country Planning Order, and that they see it as not possible, or appropriate, to apply a</p>	<p>No change to the text but suitable words will be added to LAI.</p> <p>No change to policies as already covered in LAI.</p> <p>No change as already have policy LA4 - Sea Defences.</p> <p>After discussion with Cornwall Council and the AONB unit, we will use the approach of the Tamar Valley AONB Management Plan 2014-2019 for definition of major development.</p>

blanket definition for what should be treated as major development in the AONB (paragraph 9.9). However, they put forward some key indicators that would suggest when a development is likely to be major in its effect on the landscape quality.

One of the proposed *Focused Changes to the Cornwall Local Plan Strategic Policies* (September 2014), amends paragraph 2.96 of the Cornwall Local Plan to state that:

“The Tamar Valley AONB Management Plan 2014 – 2019, in particular, provides guidance on what constitutes ‘major’ development within an AONB stating that this will depend on the scale, location and type of development proposed.”

In relation to the Roseland Neighbourhood Plan, whilst the supporting text to Policy GP2 (Design and Character of the Roseland) indicates the communities’ preference is for small scale development on the Roseland generally (“indicative size up to 5 units”), and it makes reference to the NPPF, it would be helpful if there was reference to ‘major development’, in the context of paragraph 116 of the NPPF, under objective G12.1 on the AONB.

One option might be to put forward indicators that would suggest when a development is likely to be major in its effect on the landscape quality, as in the Tamar Valley AONB Management Plan (paragraph 9.9). Alternatively, a case could be made, given the sensitivity of the landscape on the Roseland, that the 2010 Town and Country Planning Order cited above should provide the basis for indicating the thresholds of what might constitute major development, but expressing that in each case regard will be had to the type of development and the site context, and the potential to erode the special qualities and features of the ‘South Coast Central’ section of the AONB. An indication of the presumably small number of planning applications in the AONB on the Roseland, in recent years, for ‘major development’ (as defined by Cornwall Council for development management purposes under the 2010 Order) could be helpful in indicating the extent of development in recent years in supporting a justification.

32 – LA1 (iii) add....and elevated locations such as ridgelines which by definition are highly visible and interconnected over wide areas.

34 - Policy LA1 Proposals for development, including for tourism uses, will be permitted **only where they have demonstrated** that they meet the objectives of the Cornwall AONB Plan...

Adopted

Adopted without word ‘only’ as feel too draconian.

PAGE 28	PROPOSED ACTION & RATIONALE
<p>6 – Policy LA4 – Part (iii) – granite is not the local rock – can we use something more in keeping with the Roseland?</p> <p>19 - LA4 – Sea Defences iii) “new defences are built of or clad in granite” but many defences are built of local natural stone e.g. Froe, the listed St Mawes sea wall, King Harry Ferry. Natural stone would be better description than granite.</p> <p>29 – Main policy CV3 but also related policies LA2, CVI, G13.1, G13.3 and G14 – street trading in Tredenham Road, which is a Conservation Area, should be prohibited. Summers Beach should also be included. This should include Fish and Chip vans, paddle boarding etc. The only area currently designated as a Prohibited Area in the Roseland is Portscatho Slipway. While it may be a County responsibility to designate areas it should be mentioned in the Local Plan. I could not see any mention of this in the Draft Plan.</p> <p>32 – LA2 implies that a “quality”/”sensitivity”/”capacity” exercise has been done. It hasn’t, and will need to be done to give this policy teeth and credibility.</p> <p>35 - Need to refer to the Cornwall Landscape Character Assessment in preamble to policy LA2</p> <p>Change wording of LA4 to follow strategic approach to conserving rather than preserving:</p> <div data-bbox="152 927 1496 1054" style="border: 1px solid black; padding: 5px;"> <p>Policy LA4 - Sea Defences. In order to preserve conserve and enhance the local character of the Roseland’s shoreline, proposals for construction of new coastal defences or shoreline structures, or repairs to existing defences, harbours and slipways will be permitted where:</p> </div> <p>34 - Policy LA2 Proposals for development will be permitted only where they have demonstrated that they have had regard to the Roseland Local Landscape Character Assessment. Where development is proposed which will detract from or have an adverse impact on characteristics that have been identified by the local community as important to the character of the local area, it will be refused.</p> <p>Policy LA3 Proposals for development in the Plan area will be permitted only where they have demonstrated that they do not have an adverse impact on the Plan area’s natural resources [...]</p>	<p>Word ‘granite’ to be changed to ‘local natural stone’.</p> <p>As above.</p> <p>To be included in implementation projects for Conservation Area Management Plans and Roseland Design Guide.</p> <p>The words used will be reviewed to better reflect the link with the LLCA and the results of Q2. Reference in preamble agreed.</p> <p>Adopted.</p> <p>Change in LA4 adopted.</p> <p>Both adopted.</p>

NPIERS - Policy LA2- “characteristics defined by the community” is ambiguous, need to refer to characteristics defined in a plan/policy document (e.g. RLLCA)

LA4 (iii) - specifying granite always is inflexible. Unreasonable for small infrastructure which is hidden?

S5 - National Trust - Policy LA2 – Local Landscape Character (and objective G.12.2)

The Trust supports the development of the Roseland Landscape Character Assessment. However, the assessment, and supporting tables, and maps need tightening up to be effective and to provide certainty (see separate comments – below).

Policy LA4 – Sea Defences

Proposals for the construction of new sea defences or shoreline structures, or repairs to existing defences should *only* be permitted, under (i) where the need has been demonstrated, *it is in line with the shoreline management plan, and the development will not have an unacceptable impact on coastal change or flood risk elsewhere* (suggested additional text in italics).

S12 - Cornwall AONB - Page 28 and 29

Section G12.2 – Safeguarding the Roseland’s Landscape, which is based on the priority the community placed upon the protection and enhancement of Roseland’s special landscape, is welcomed and supported. Reference is made in the supporting text to the Roseland Landscape Character Assessment (LLCA) which is subject to consultation in conjunction with the Roseland Plan. This report outlines how LLCA provides a framework to understand the landscape by classifying land, describing the relationship between people and land and defining the character of the locality. The LLCA has been undertaken by local volunteers, with the support as a pilot of a Cornwall Council Landscape Officer and the Cornwall AONB Unit. The LLCA:

- Provides environmental information as an evidence base for the plan;
- Celebrates what is important about the Roseland landscape;
- Identifies features and issues of key importance to local people; and
- Helps to set priorities for future management of land and development.

The LLCA supports the Roseland Neighbourhood Development Plan Policies in that it:

- Enables landscape character to be taken fully into account when assessing development proposals in the South Coast

LA2 - The words used will be reviewed to better reflect the link with the LLCA and the results of Q2. LA4 - Word ‘granite’ to be changed to ‘local natural stone’ but no change in relation to ‘small infrastructure’.

A better link will be shown between the LLCA and the Plan document.

Change to LA4 adopted.

No change to the document. Thank you for your support.

<p>Central section of the Cornwall AONB, and its setting;</p> <ul style="list-style-type: none"> • Enables those valued landscapes and green spaces to be protected from development that would neither maintain nor enhance their special qualities; • Fully consider the capacity of the Roseland landscape to accommodate settlement growth, renewable energy development, tourism proposals and access to estuary and coast; and • Enables appropriate weight to be attached to the conservation and enhancement of Roseland’s unique heritage and natural environment. <p>Page 28 - Policy LA2 – Local Landscape Character. The LLCA has provided the opportunity to set down, based on local survey work and assessments by volunteers, a detailed assessment of the landscape character of the Roseland landscape. Policy LA2 will enable this resource to be used constructively in the emergence and assessment of future development proposals to enable the characteristics of the landscape to be respected and embedded in appropriate development proposals.</p> <p>S13 - Natural England - We advise you that we disagree with the conclusion of the Cornwall Local Plan that there would be no Likely Significant Effect due to recreational boating in the Fal Estuary effecting the qualifying features of the SAC . This issue will need to be addressed in the Cornwall Local Plan and mitigation agreed in the higher level plan. Whilst the Neighbour Plan proposes containing any additional development within the settlement boundaries, we need to be mindful when considering the Neighbourhood Plan in –combination with other Plans. This includes the exceptions regarding affordable housing supported by market housing in the Local Plan Policy 3 and the overall CNA distribution of a total of 3 900 dwellings with 900 houses outside Truro, a significant proportion of these destined for settlements within the Neighbourhood Plan area.</p>	<p>Wording of Policy LA4 strengthened to emphasize that there must be no damage to the Fal and Helford SAC.</p>
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PAGE 29	PROPOSED ACTION & RATIONALE
<p>6 – Policy LA5 – Line 9 – can we delete the words “where practicable”?</p>	<p>Adopted.</p>
<p>13 – Policy LA5 – 3rd paragraph to have added at end – ‘and where this is unavoidable, substitute sites which reinstate the integrity of such corridors will be required to be established’</p>	<p>No change to policy as feel contradictory.</p>
<p>19 – Reason for Policies second paragraph - small ‘w’ on Cornwall Wildlife Trust</p>	<p>Adopted.</p>
<p>32 – LA5 – Combine paragraphs 3 and 4...after “of great importance” continue with “Retention, restoration...”etc., and</p>	<p>No change to policy. Current</p>

<p>not “are” but “will be”</p> <p>S6 - Transportation Service of Cornwall Council - Landscape policies LA1-LA5 - If the plan could include an additional policy on the control of illegal advertising on the public highway, it would greatly assist the highway managers in dealing with this issue. It is often an eyesore and we currently don’t have a particular mandate to deal with it.</p> <p>This would reinforce the guidance set out in the <u>Rural Highways Best Practice guide</u>.</p> <p>A further issue in the Rural Highways best practice is the aim of rationalising signing. A policy in the neighbourhood plan to reinforce this would again help with the aim of de-cluttering the Roseland of unnecessary signage. This could also include rationalising brown tourist signs.</p> <p>Cllr Julian German has been an advocate of such an exercise for some time. -</p> <p>34 - Policy LA5 [...] Proposals for development will be permitted only where they have demonstrated that the development [...]</p> <p>45 - Sentence immediately preceding Policy LA5. Ensure Cornwall <u>Wildlife</u> Trust.</p> <p>31 - LA5 (ii) Biodiversity and Geological Conservation. Would this include building on top of or adjacent to the Pendower Beach SSSI?</p> <p>S7 - Environment Agency - Policy LA5 – Biodiversity and Geological Conservation; we support this policy.</p> <p>NPIERS - LA5 (i) –specifying “positive impact” may be unreasonable. Could say where “no adverse impact”</p> <p>35 - Rewording of Policy LA5 and the removal of paragraphs from policy to be included in the reasons for policy to distinguish between matters of policy and management objectives.</p>	<p>wording considered acceptable.</p> <p>To be included in implementation projects for Conservation Area Management Plans and Roseland Design Guide.</p> <p>Adopted.</p> <p>Adopted.</p> <p>Reference to SSSI will be incorporated.</p> <p>No change to document but thank you for your support.</p> <p>Adopted.</p> <p>Adopted ‘will’ for ‘would’ but no further change to policy as not highlighted by any other respondent.</p>
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<p><i>The management, restoration and re-creation of habitats, both within and outside designated sites, building upon a network of protected sites across the Roseland, is of great importance.</i></p> <p><i>Locally important habitats (including semi-natural habitats) should, where practicable, be retained within any development proposals. The integrity of wildlife corridors should not be compromised.</i></p> <p><i>Retention, restoration, re-creation or enhancement of semi-natural habitat or habitat linkages (such as hedges) are encouraged through appropriate management.</i></p> <p>Policy LA5 - Biodiversity and Geological Conservation. Planning permission for development will be granted provided that it has been demonstrated that the development:</p> <p>(i) would will have a positive impact upon the Plan area's biodiversity; and</p> <p>(ii) would will not have an adverse impact, either directly or indirectly, on Regionally Important Geological /Geomorphological sites and on the ecological value of County Wildlife Sites, County Geology Sites and Local Nature Reserves; ;</p> <p><i>(iii) will retain locally important habitats (including semi-natural habitats), where practicable.</i></p> <p>The management, restoration and re-creation of habitats, both within and outside designated sites, building upon a network of protected sites across the Roseland, is of great importance.</p> <p>Locally important habitats (including semi-natural habitats) should, where practicable, be retained within any development proposals. The integrity of wildlife corridors should not be compromised.</p> <p>Retention, restoration, re-creation or enhancement of semi-natural habitat or habitat linkages (such as hedges) are encouraged through appropriate management.</p> <p>49 - G.12.3. I have looked at the maps and I see no reference to the very rare Shore Dock on Pendower/Carne beach.</p>	<p>Will be included within LLCA.</p>
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PAGE 30	PROPOSED ACTION & RATIONALE
<p>16 - In the light of the recent application (currently withdrawn but likely to be resubmitted) for a helipad for frequent, permanent, use, between the hours of 7am and 10pm, to be sited within the boundaries of St. Mawes, adjacent to housing, a school and land where animals are kept, I think it is important to ensure that the plan considers how it might best "set the</p>	<p>No specific policy required as feel CVI and CDI (xiv) are adequate and will apply to all development.</p>

<p>scene" to address any future proposals of this type.</p> <p>There are a number of places within the consultation document which refer to the "tranquil and untouched countryside" and the range of key semi-natural habitats (p7), the weight to be given to conserving landscape and scenic beauty etc. (p15), possibly best summed up on p21 under overall strategy. Also, of course, covered on p27, policy LA1 which refers to scale and design that has appropriate regard to the character, sensitivity and capacity of...the landscape and appropriately sited to avoid damage to the natural beauty, character and special qualities etc.</p> <p>Since sensible markers are included which, when adopted, provide clear guidelines for those proposing housing developments and related constructions, extensions etc., it would seem appropriate to do something similar for any/all proposals which will affect life on the Roseland. A helipad is just such a development, being, by its nature, of benefit to the few and disruption to the many who live here or visit to enjoy peace and tranquillity.</p> <p>Naturally, no one would object to the need for readily identifiable landing sites for the air ambulance service and the majority of people recognise the need for overflying by Culdrose personnel on security/ training exercises, however a helicopter landing site for personal/hotel guest use can hardly be of economic or other benefit to the residents or the vast majority of visitors.</p> <p>It seems to me that a suitable place for inclusion of a specific policy statement would be Policy CVI - Village character, which covers adverse impacts on the amenity of local residents; contributes to and enhances the character of the village etc.</p> <p>25 – G13.1 second sentence refers to K27. K27 is list of potential projects... (Reference 48 in Section J) Reference to K27 seems to be in error.</p> <p>29 – Main policy CV3 but also related policies LA2, CVI, G13.1, G13.3 and G14 – street trading in Tredenham Road, which is a Conservation Area, should be prohibited. Summers Beach should also be included. This should include Fish and Chip vans, paddle boarding etc. The only area currently designated as a Prohibited Area in the Roseland is Portscatho Slipway. While it may be a County responsibility to designate areas it should be mentioned in the Local Plan. I could not see any mention of this in the Draft Plan.</p> <p>35 - Relevant Higher Level Policy for policy CVI should be CDWLP 3D not 3AD.</p> <p>34 - Policy CVI Proposals for development in or adjacent to villages and hamlets will be permitted only where they</p>	<p></p> <p></p> <p></p> <p></p> <p></p> <p>Agreed.</p> <p>To be included in implementation projects for Conservation Area Management Plans and Roseland Design Guide.</p> <p>Agreed.</p> <p>Agreed.</p>
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<p>have demonstrated that [...]</p> <p>NPIERS - CV1 (v) “increasing full time residency”. See HO8 page 44 which questions these controls from a planning perspective.</p> <p>49 - G13.1 In my view Cornwall Council Design Guide of 283 pages is not proportionate for Veryan Parish or indeed the five parishes if the legal requirement have been met. The Cornwall Council Design Guide should be deleted - it should play no part in this Neighbourhood Plan. The houses in Veryan Parish or the larger area are simple and low, as are the farms and hotels and any new build can be controlled as above. The commercial unit near Bessy Beneath is overrun by vehicles and this should be avoided by providing more than adequate parking in the Neighbourhood Plan.</p> <p>S12 - Cornwall AONB - Page 30 Section G13 Section G13 The Character of Villages and Hamlets – The general objective and sub objectives are supported. Policy CV1 – Village Character. The villages in the Roseland make a substantial contribution to the character of the AONB. Policy CV1, CV2, CV3, CV4 and CV5 will promote the conservation and enhancement of their village character through the protection of their historic, archaeological and marine heritage.</p>	<p>HO8 reflects the wishes of the community. This matter will be discussed with Cornwall Council. Advice is to leave the document 'as is' (reflecting community wishes). The emerging Roseland Design Guide will have the ability to deal with the matters raised.</p> <p>No change to the document. Thank you for your support.</p>
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PAGE 31	PROPOSED ACTION & RATIONALE
<p>19 - Policy CV3 Conservation Criteria. (iii) and (iv) weaken the policy and are open to interpretation and abuse. I would recommend removal of these two clauses.</p> <p>21 – Policy CV3 focusses on buildings in Conservation Areas whilst Policy SF4 concentrates on open land available to the public. I believe it is important to maintain open areas such as gardens and greenery within the Conservation Areas in order to maintain the area character. This would translate to “no infilling or building within gardens in the various Conservation Areas”.</p> <p>29 – Main policy CV3 but also related policies LA2, CV1, G13.1, G13.3 and G14 – street trading in Tredenham Road, which is a Conservation Area, should be prohibited. Summers Beach should also be included. This should include Fish and</p>	<p>Adopted.</p> <p>This will be considered in the implementation project on Conservation Area Management Plans and the emerging Roseland Design Guide.</p> <p>This will be considered in the implementation project on Conservation Area Management</p>

<p>Chip vans, paddle boarding etc. The only area currently designated as a Prohibited Area in the Roseland is Portscatho Slipway. While it may be a County responsibility to designate areas it should be mentioned in the Local Plan. I could not see any mention of this in the Draft Plan.</p> <p>32 – CV2 – after “the grouping of buildings” add “and the elements of the landscape”</p> <p>CV4 – remove “significant impact” and substitute “any alteration”. Remove “significant impact” and substitute “any impact”. Otherwise a mechanism for assessing “significance” or not will have to be established</p> <p>35 - Amend to improve clarity</p> <div data-bbox="152 536 1491 724" style="border: 1px solid black; padding: 5px;"> <p>Policy CV2 - Listed Buildings. Development should be designed to respect the setting of listed buildings and have regard to scale, height, massing, alignment and use of appropriate materials. Developments should also retain the spaces between and the grouping of buildings which form the setting of a listed building. Proposals which would have an adverse impact upon the setting of a listed building will not be <i>permitted</i> approved.</p> </div> <p>Title of Policy CV3 should read <i>Conservation Areas</i> not Conservation Criteria as it is a policy relating to development in conservation areas not to conservation generally</p> <p>34 - Policy CV2 Proposals for development will be permitted only where they have been designed to respect the setting [...] Proposals for development must retain the spaces between and the grouping of buildings which form the setting of a listed building. [...]</p> <p><i>Comment (also applies to GV4): “should” is unclear as to its intent, “must” makes the condition a clear requirement.</i></p> <p>Policy CV3 Proposals for development in a Conservation Area [...] must preserve or enhance [...] Redevelopment which involves the demolition of an existing building within a Conservation Area will be permitted only where [...]</p> <p>Policy CV4 Where proposed development is likely to affect significantly sites of local archaeological importance the proposal must demonstrate how the importance of the site will be protected in situ [...]</p>	<p>Plans and the emerging Roseland Design Guide.</p> <p>Both adopted.</p> <p>Both adopted.</p> <p>CV2 – First suggestion adopted without the word ‘only’. Second suggestion not adopted as feel may be seen as unreasonable.</p> <p>CV3 – Word ‘should’ retained as feel would otherwise be seen as unreasonable. ‘Only’ not adopted as felt too draconian.</p> <p>CV4 - Adopted.</p>
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<p>S7 - Environment Agency - Policy CV2, CV3 – The requirement of any necessary flood mitigation measures for development to be safe for its lifetime will need to be appropriately balanced against the listed building / conservation area status.</p> <p>NPIERS - CV2-Is last sentence necessary? It only refers to “setting” not the other criteria? CV3 – no need to name Conservation Areas just refer to them generally. It helps if any are created after the Plan is made.</p> <p>45 – CV3 Does the criteria <u>not therefore apply</u> to Ruan Laniorne and Philleigh parishes; if not why not? Should they be conservation areas as well? Open to abuse by developers.</p> <p>49 - Policy CV 2. This refers to what a planning officer should take in account in making a decision on a planning application that affects a listed building or is attached to a listed building. A policy as to what the residents wish to approve to a listed building is missing and not included in this Plan and it should be.</p>	<p>Assessment for flood risk will be required for all new developments and will be incorporated in policy GPI.</p> <p>Both adopted</p> <p>Agreed – specific names of villages to be removed. This will be considered in the implementation project on Conservation Area Management Plans and the emerging Roseland Design Guide.</p> <p>This will be considered in the implementation project on Conservation Area Management Plans and the emerging Roseland Design Guide.</p>
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PAGE 32	PROPOSED ACTION & RATIONALE
<p>I – Policy CV5 Marine Heritage. I wonder if we can extend this to include protection of the estuary from development of private slipways.</p> <p>I had quite some contact with Dr Miles Hoskin back in about 2000 when there was an application to extend Freshwater Boatyard. He worked for the Environment Agency at the time. One of the observations which came out of discussion was the long term damage which had been caused during construction, to the marine life living in the mud. The other issue was the alteration of tidal flow around the slipways which interfered with the natural scouring and deposition of silt with the</p>	<p>Discussed with Cornwall Council Planning Dept. Advice is to reword LA4 slightly to make it cover Sea Defences and Shoreline Structures.</p>

<p>rise and fall of the tide. This was indeed noticed for a considerable distance along the estuary below my property after the development of the new slipways at Freshwater Boatyard.</p> <p>I appreciate Freshwater Boatyard is a commercial development which provide jobs and brings money into the Roseland. However the same cannot be said for private slipways, and therefore I feel they should not be allowed under any circumstances.</p> <p>35 - Policy CV5 needs a bit more explanation in the pre-able about what constitutes 'potential uses and operations' to give clarity to those who wish to carry out developments affecting such installations.</p> <p>S13 - Natural England - We advise you that we disagree with the conclusion of the Cornwall Local Plan that there would be no Likely Significant Effect due to recreational boating in the Fal Estuary effecting the qualifying features of the SAC . This issue will need to be addressed in the Cornwall Local Plan and mitigation agreed in the higher level plan. Whilst the Neighbour Plan proposes containing any additional development within the settlement boundaries, we need to be mindful when considering the Neighbourhood Plan in –combination with other Plans. This includes the exceptions regarding affordable housing supported by market housing in the Local Plan Policy 3 and the overall CNA distribution of a total of 3 900 dwellings with 900 houses outside Truro, a significant proportion of these destined for settlements within the Neighbourhood Plan area.</p>	<p>No change to the policy as do not wish to be overly restrictive.</p> <p>Change made to Policy CV5 to ensure no damage to Fal and Helford SAC.</p>
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PAGE 33	PROPOSED ACTION & RATIONALE
<p>29 – Main policy CV3 but also related policies LA2, CV1, G13.1, G13.3 and G14 – street trading in Tredenham Road, which is a Conservation Area, should be prohibited. Summers Beach should also be included. This should include Fish and Chip vans, paddle boarding etc. The only area currently designated as a Prohibited Area in the Roseland is Portscatho Slipway. While it may be a County responsibility to designate areas it should be mentioned in the Local Plan. I could not see any mention of this in the Draft Plan.</p> <p>S6 - Transportation Service of Cornwall Council - Policy SF2 - Sustainable Transport - This policy fits well with the policies of the Local Transport Plan.</p>	<p>This will be considered in the implementation project on Conservation Area Management Plans and the emerging Roseland Design Guide.</p> <p>Adopted.</p>

<p>Higher level policies should also refer to the Local Transport Plan - <u>Connecting Cornwall: 2030</u> Policies 5 & 21</p> <p>35 - Policy SF2 needs clarifying as to what is meant by sustainable transport use or reword the policy. Policy needs to be extended for sustainable transport to include ferries.</p> <p>34 - Policy SF2 Proposals for development will only be permitted where they provide for sustainable transport use [...] Development which results in a loss or reduction in the provision or convenience of public transport [...] will be refused.</p> <p><i>Comment: reference to loss or reduction of convenience is a strengthening of policy, but most people will only use public transport if it is convenient, so it is an important factor in retaining use of services.</i></p> <p>NPIERS - G14.1- delete reference to “full time residence restriction” see HO8 page 44.</p> <p>49 - Policy SF 2 The Plan should be seeking to reinstate the Portloe loop bus which enable people to get to and from work, to and from education establishments, to and from the Dr surgery, dentist, bank, library now the library now longer visits Portloe and so on. Many of the people signing the Proposal sent in separately are without transport and relied on the bus. Affordable housing by its name implies people who cannot afford a car and the lack of the bus will have a knock on affect especially if the aim is to provide one new job for every new home. The reinstatement of the bus is not a project it is a necessity.</p>	<p>No change to policy as consider ferries are included under the term ‘public transport’.</p> <p>First suggestion adopted but without word ‘only’.</p> <p>Second suggestion not adopted as feel ‘provision’ as far as can go under Plan.</p> <p>No change as reflects the wishes of the community.</p> <p>No change to the document as this matter is outside the remit of the Plan.</p>
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PAGE 34	PROPOSED ACTION & RATIONALE
<p>21 – Policy CV3 focusses on buildings in Conservation Areas whilst Policy SF4 concentrates on open land available to the public. I believe it is important to maintain open areas such as gardens and greenery within the Conservation Areas in order to maintain the area character. This would translate to “no infilling or building within gardens in the various Conservation Areas”</p> <p>S6 - Transportation Service of Cornwall Council - Policy SF3 – Public Car Parking - Suggest an additional requirement:</p>	<p>This will be considered in the implementation project on Conservation Area Management Plans and the emerging Roseland Design Guide.</p> <p>No change to Plan. Travel Plans apply to much larger developments than those proposed for the</p>

<p>(iii) all significant development should be accompanied by an appropriate travel plan, to reduce the demand on car parking.</p> <p>35 - Policy SF3 - Need to clarify the likely cause of impacts on landscape and character suggest amending clause (ii) of the policy to read:</p> <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p>(ii) there is no adverse effect on landscape or village character <i>from uncontrolled roadside parking.</i></p> </div> <p>NPIERS - SF4 - reference to areas “where ownership is not currently defined” is ambiguous and not relevant to planning decision making, therefore delete. Need to define open space more precisely e.g. in glossary. It could include small areas of amenity landscaping.</p> <p>45 – SF4 Should the open spaces be defined? I remember submitting those I know. I still maintain beaches should be classed as open spaces used for recreation. (What else were the occupants of 120 cars at Carne Beach on Bank Holiday doing!!)</p>	<p>Roseland.</p> <p>No change to policy as should be a matter for the Parish Councils.</p> <p>Deletion adopted. Agree to add to list of open spaces under Appendix K30 ‘including areas designated by Parish Councils during the lifetime of the Plan’.</p> <p>Refer to Cornwall Council Planning Dept. Advice - leave 'as is'.</p>
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PAGE 35	PROPOSED ACTION & RATIONALE
<p>35 - Change wording of Policy GPI clause (iii) to follow strategic approach of conserving rather than preserving:</p> <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p>(iii) <i>conserving</i> protecting the special environment in which we live – for residents, visitors and local businesses;</p> </div> <p>34 - Policy GPI Proposals for development must demonstrate that the development will make a positive contribution to [...]</p> <p>S7 - Environment Agency - Policy GPI – Sustainable Development – design criteria should reflect the best practice surface water drainage standards that have been adopted by Cornwall Council in the Drainage Guidance for Cornwall. http://www.cornwall.gov.uk/environment-and-planning/planning/planning-policy/cornwall-local-plan/cornwall-topic-based-evidence-base/cornwall-strategic-flood-risk-assessment-(sfra)/</p> <p>41 - General Principles - No mention is made in the Plan of the importance of Environmental Impact Assessment for</p>	<p>Adopted.</p> <p>Adopted.</p> <p>Adopted – added as (v) to policy and reference added to document.</p> <p>Refer to Cornwall Council Planning</p>

<p>development applications in environmentally sensitive areas such as the Roseland. EIAs formalise and make statutory the need and the process for assessing environmental impact, as the name implies. An EIA would have to take account of local landscape character and the effect on geological formations, historic sites, wildlife etc. of any proposed development.</p> <p>Could EIAs be made mandatory, especially for any larger scale development application on the Roseland? The term 'Environmental Impact Assessment' would need to be included in the glossary.</p>	<p>Dept for advice. Advised that we can't change the requirements for an EIA.</p>
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<p>PAGE 36</p>	<p>PROPOSED ACTION & RATIONALE</p>
<p>35 - Change wording of the first paragraph to follow strategic approach of conserving rather than preserving:</p> <div data-bbox="152 608 1424 724" style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p>The core of The Roseland Plan is the desire to retain conserve and enhance the Roseland's character and distinctiveness for current residents and visitors, but also to ensure a vibrant and economically viable future for the peninsula.</p> </div> <p>NPIERS - H15.2- more clarity required that it's only the defined sections of the Carrick Design Guide which are being applied.</p>	<p>Adopted.</p> <p>Adopted – third paragraph changed to 'certain sections of the much ...' and add '(See table below)'.</p>

<p>PAGE 37</p>	<p>PROPOSED ACTION & RATIONALE</p>
<p>8 – You quote the 'Town and Country Planning Instrument 2184 (2010) (42)', stating that NPPF provides support for this by banning 'major developments'. I have scoured this document you have quoted from and cannot only find no reference to any such 'banning' but there is no 42 marker in the document. The document stops at marker 41. Please could you clearly state where this has been mentioned, as such a severe statement seems improbable?</p> <p>24 – The community (and I) would prefer new housing developments to be 5 or less properties <u>but</u> this hugely restricts the number of developers who would be able to proceed. There are insufficient economies of scale to make a reasonable profit</p>	<p>Refer to Cornwall council Planning Dept and the AONB for definition of major development suitable for the Roseland and advice on how best to include in the document.</p> <p>No change to the document as inconsistent with the views</p>

<p>on any development of less than ten to twelve properties.</p> <p>If we don't attract some commercial developers we won't get any more affordable homes for local people.</p> <p>31 - H. Policies for future development. H.15 General Principles and Design</p> <p>'Major development' referred to in NPPF and defined in TCP instrument 2184. This should be included as a specific policy Vis: no major developments as defined by TCPI 2184 (2010) will be permitted within the Roseland AONB except in exceptional circumstances'. As discussed at the meeting with John and June, it would also be helpful if this definition of 'major' could be included in the glossary of terms.</p> <p>NPIERS - In H15.2 -</p> <p>4th para. Suggest delete "but these do not result from the Plans policies" as it suggests a conflict with national policy which is contrary to the basic conditions.</p> <p>5th para. There is a need to redefine "major development" and omit the reference to the NPPF in relation to it as it appears in the Draft Plan. The NPPF does not define major development. The quoted definition as it appears in the T&CP (Development Management Procedure)(England) Order 2010 relates to various administrative planning processes connected with planning applications relating to major development. The reference to major development in the NPPF is arguably broader and has been the subject of various planning disputes. Suggest consider a broader definition included in the glossary.</p>	<p>expressed by the community. The Plan proposes taking a Community Land Trust approach.</p> <p>After discussion with Cornwall Council and the AONB Unit, we will use the approach of the Tamar Valley AONB Management Plan 2014-2019 for definition of major development.</p> <p>4th para – adopted – remove last sentence.</p> <p>5th para - After discussion with Cornwall Council and the AONB unit, we will use the approach of the Tamar Valley AONB Management Plan 2014-2019 for definition of major development.</p>
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PAGE 38	PROPOSED ACTION & RATIONALE
<p>13 – H15.3 second paragraph 'the village edges set out in the Parish Character Assessments' and Policy GP3 'set out in the Parish Character Assessments defines the settlement boundaries' – the inconsistent work produced so far on the village assessment (VA) makes this a potential weak link. In any case none of the V.A's 'determine' village edges, nor did the methodology set out to do so. It's the old Carrick village envelopes that defines; our V.A's don't and they can't.</p> <p>22 - It would be interesting and useful to have drawings and details of different types of houses and in different periods i.e. Farmhouses, Cottages, Captain's Houses and Fishermen's Cottages etc. In-fill housing is of course good, but not to the extent that wildlife is compromised within villages.</p>	<p>No change to document as defined only in Parish Character Assessments and not in LLCA.</p> <p>This will be considered in the emerging Roseland Design Guide.</p>

<p>Perhaps these points can be included in the Plan.</p> <p>32 – GP3 – Need to co-ordinate the term “village” with the LLCA where Philleigh and Ruan Laniorne are deemed villages (since they both have 2 of the 3 essential elements of a village, namely shop – church – pub) and Portholland (here listed) is not deemed a village. Is this current list derived from the fact that all places listed have current “settlement boundaries” and no other villages/hamlets have?</p> <p>34 - Policy GP2 In the Plan area, any proposal for development (including development on previously developed land) must be sited and designed so as to promote [...]</p> <p>Policy GP3 Development proposals may be permitted within those boundaries.</p> <p>31 - Policy GP2 Design and Character of the Roseland (iii) ‘the scale of the development is appropriate for the Roseland.’ How will this be proven? Will photomontages of proposed developments set in the landscape be a requirement?</p> <p>S7 - Environment Agency - The settlements listed in Policy GP3 have locations within them which are at risk of flooding. The Plan’s strategy to limit the amount of new building must also reflect a sequential approach to flood risk. Infill development and subdivision of residential curtilage for additional dwelling(s) would be subject to the Sequential and Exception Test of the NPPF. Change of use applications are not subject to the flood risk sequential test. To be consistent with the NPPF such applications would need to demonstrate through an appropriate Flood Risk Assessment that the development would be safe for its lifetime, not increase flood risk and where possible seek to reduce flood risk overall.</p> <p>NPIERS - GP2- It should say “detailed guidance is contained in the Carrick Design Guide to be replaced by the Roseland Plan design Guide.</p> <p>GP3- First sentence is not a policy but an objective and should be relocated in the preamble to the policy.</p> <p>GP3 - After “exception sites” add “for affordable housing”</p> <p>45 – H15.3 Once again Ruan Laniorne/Philleigh are omitted. Does that not give opportunities for developers to ignore the central theses of the Roseland Plan in these 2 parishes? It is a joint Plan for all parishes and should have similar guidelines/constraints for all!</p>	<p>Agreed to change the term ‘village’ to ‘settlement’ throughout the document to limit confusion. No change to the policy regarding named settlements as these have defined boundaries (as defined in the Glossary).</p> <p>Both adopted.</p> <p>We feel that use of the Roseland Development Checklist and the Development Management Toolkit are adequate.</p> <p>No change to the policy as covered by NPPF and Building Regulations.</p> <p>GP2 – adopted GP3 – No change to first sentence as feel current wording clear but adopt additional words.</p> <p>No change to the document regarding named settlements as these have defined boundaries (as defined in the Glossary).</p>
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S5 - National Trust - Policy LA1 is supported, but in relation to objective G12.1 there remains a concern in relation to major development in the AONB, which is mentioned separately in the supporting text to policy **GP2** (Design and Character of the Roseland).

The National Planning Policy Framework requires exceptional circumstances and public interest tests for major development in such designated areas (NPPF; para 116), but it does not provide a definition of 'major development'. In some cases extant planning legislation has been cited, with the definition of 'major development' provided by Statutory Instrument 2010 No.2184 – *The Town and Country Planning (Development Management Procedure) (England) Order 2010*. However, recent case law has tended to suggest that the phrase 'major development' does not have a uniform meaning in relation to planning regulations, policy or guidance, and that whether a proposal amounts to 'major development' in the context of paragraph 116 of the NPPF is a matter of the decision-maker in relation to the specific case. In a recent appeal decision for 14 residential units at Coleford In Gloucestershire, within an AONB, the Inspector had regard to the size of the settlement and the location and extent of development in recent years in determining that it represented major development (APP/P1615/A/13/2204158; dated 23 June 2014).

The Tamar Valley AONB Management Plan 2014 -2019 indicates that the AONB Partnership for the Tamar Valley AONB regard the reference to 'major development' in the context of paragraph 116 of the NPPF as differing from the definition set out in the 2010 Town and Country Planning Order, and that they see it as not possible, or appropriate, to apply a blanket definition for what should be treated as major development in the AONB (paragraph 9.9). However, they put forward some key indicators that would suggest when a development is likely to be major in its effect on the landscape quality.

One of the proposed *Focused Changes to the Cornwall Local Plan Strategic Policies* (September 2014), amends paragraph 2.96 of the Cornwall Local Plan to state that:

“The Tamar Valley AONB Management Plan 2014 – 2019, in particular, provides guidance on what constitutes ‘major’ development within an AONB stating that this will depend on the scale, location and type of development proposed.”

In relation to the Roseland Neighbourhood Plan, whilst the supporting text to Policy GP2 (Design and Character of the Roseland) indicates the communities' preference is for small scale development on the Roseland generally (“indicative size up to 5 units”), and it makes reference to the NPPF, it would be helpful if there was reference to 'major development', in

After discussion with Cornwall Council and the AONB Unit, we will use the approach of the Tamar Valley AONB Management Plan 2014-2019 for definition of major development.

<p>the context of paragraph 116 of the NPPF, under objective G12.1 on the AONB.</p> <p>One option might be to put forward indicators that would suggest when a development is likely to be major in its effect on the landscape quality, as in the Tamar Valley AONB Management Plan (paragraph 9.9). Alternatively, a case could be made, given the sensitivity of the landscape on the Roseland, that the 2010 Town and Country Planning Order cited above should provide the basis for indicating the thresholds of what might constitute major development, but expressing that in each case regard will be had to the type of development and the site context, and the potential to erode the special qualities and features of the 'South Coast Central' section of the AONB. An indication of the presumably small number of planning applications in the AONB on the Roseland, in recent years, for 'major development' (as defined by Cornwall Council for development management purposes under the 2010 Order) could be helpful in indicating the extent of development in recent years in supporting a justification.</p>	
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PAGE 39	PROPOSED ACTION & RATIONALE
<p>35 - What is the evidence for the statement: "There is strong support from the community for building Affordable Housing for which there is a demonstrated need and a strong Roseland connection."</p> <p>34 - Policy HO1 Proposals to remove planning restrictions or conditions which limit the use of residential dwellings to holiday letting may be permitted provided the dwelling will be Affordable Housing.</p> <p>Policy HO2 Proposals for a hotel, boarding house, guest house [or residential institution], or for part of such a building, to be used as a residential dwelling house or dwelling houses may be permitted provided that building or that part of a building will be Affordable Housing.</p> <p><i>Comment: I have added in a provision which applies the requirement for Affordable Housing to conversion of part of a hotel – e.g. conversion of staff accommodation to residential housing – as well as to conversion of the whole. You might also like to consider including the conversion of residential institutions (e.g. care homes) in this policy.</i></p> <p>NPIERS - HO1 &HO2-"local (Roseland) connections"-need to cross refer to definition in Action HO6.</p>	<p>Agreed to insert suitable reference to community consultation.</p> <p>Both adopted. Note that discussion with C Council recommended that we insert in preamble to HO2 and HO3 that we are seeking to negotiate a high % as Affordable Housing and that we could try to cover the 'farm worker scenario' through a Section 106 agreement.</p> <p>Agreed to add suitable words to the preamble.</p>

PAGE 40	PROPOSED ACTION & RATIONALE
<p>13 – Policy HO3 add</p> <p>(xi) an appropriate and agreed landscape plan is implemented (in line with the RPDG).</p> <p>32 – HO3 – change “to use for” to “for use as”</p> <p>HO3 (v) delete “minor residential activities and structures” and insert “additional structures such as garage blocks and car ports and aggregated parking areas necessitated by the relevant design guide requirements”</p> <p>34 - Policy HO3 Proposals for the re-use of a redundant building, or part of a redundant building, as a residential dwelling house or dwelling houses may be permitted only where the proposal meets all of the following criteria:</p> <ul style="list-style-type: none"> (i) the use of that building or that part of the building will be Affordable Housing, (ii) the building at the time of the application by reason of its form, bulk, design [...] <p><i>Comment 1: I have added in a provision which applies the requirement for Affordable Housing to conversion of part of a building as well as to conversion of the whole.</i></p> <p><i>Comment 2: By putting the requirement for the conversion to be a conversion to Affordable Housing in the list of conditions, the policy is made more general, and applies to all proposed conversions to housing use, not just conversions to affordable housing.</i></p> <p>S7 - Environment Agency - Policy HO3 - should reflect the requirement that proposals should avoid areas at risk of flooding.</p>	<p>No change to the policy. This will be considered in the emerging Roseland Design Guide and the Roseland Development Checklist.</p> <p>First suggestion adopted. Second suggestion – changed policy wording of (v) to ‘... by the cumulative effect of ...’</p> <p>Refer revised wording to Cornwall Council Planning Dept for advice but retain ‘... will be permitted where ...’</p> <p>Agree that this wording might allow open market housing. Refer to Cornwall Council Planning Dept for advice.</p> <p>Assessment for flood risk will be required for all new developments and will be incorporated in policy</p>

<p>NPIERS - HO3 (ii) - the reference to permitted development allowances is clumsy and difficult to interpret. Permitted development in this context only relates to existing dwellings and the policy relates to non – residential buildings. Also permitted development is notoriously difficult to interpret. Suggest using a volume increase limit as a percentage. HO3 (vi) - it should say “detailed guidance is contained in the Carrick Design Guide to be replaced by the Roseland Plan design Guide.</p>	<p>GPI. First suggestion – refer to Cornwall Council Planning Dept for advice. Council will provide some clearer wording. Second suggestion adopted.</p>
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<p>PAGE 41</p>	<p>PROPOSED ACTION & RATIONALE</p>
<p>12 – Policy HO5 – no mention of <u>Treworthal</u> (exception sites) Why?</p> <p>13 – Policy HO4 – add (v) appropriate landscaping is provided in line with the Roseland Plan DG *replaced by comment under 32 below*</p> <p>19 – HO5 as with p24, is naming settlements helpful? Should Trewortha be Treworthal?</p> <p>32 – HO4 - Need to co-ordinate the term “village” with the LLCA where Philleigh and Ruan Laniorne are deemed villages (since they both have 2 of the 3 essential elements of a village, namely shop – church – pub) and Portholland (here listed) is not deemed a village. Is this current list derived from the fact that all places listed have current “settlement boundaries” and no other villages/hamlets have? HO4 (ii) can we legally add “<u>ALL</u> subsequent”? HO4 (v) add paragraph “an acceptable landscape scheme including both hard and soft works is provided in line with the Roseland Plan Design Guide”</p> <p>34 - Policy HO4 In the settlements of [Gerrans...], permission may be granted for housing on infill sites within</p>	<p>Not mentioned as does not have a defined boundary, but wording of policy to change</p> <p>No change to the policy. This will be considered in the emerging Roseland Design Guide and the Roseland Development Checklist.</p> <p>The wording of the policy to change to exclude names of settlements without defined boundaries.</p> <p>Agreed to change the term ‘village’ to ‘settlement’ throughout the document to limit confusion. HO4 (ii) adopted. HO4 (v) No change to the policy. This will be considered in the emerging Roseland Design Guide and the Roseland Development Checklist.</p>

the designated boundaries only where:

- (i) **the use of that housing will be for Affordable Housing, [or for Affordable-led Housing?]**
- (ii) **priority has been** given to the use of previously developed land,
- (iii) the proposed dwelling(s) are of a type and density [...]
- (iv) adequate parking is provided [...]

Comment 1: there is no definition of “Affordable-led housing” in the draft Plan, and it is unclear whether this is meant to be a reference to affordable housing or to something else, such as a mix of affordable and non-affordable housing – in which case the policy needs a lot more work.

Comment 2: As with HO4, I have re-ordered the drafting slightly to make the policy apply to all proposed conversions to housing, not just to conversions for Affordable Housing.

Policy HO5 Permission may be granted for **housing** on an Exception Site **only where** all of the following criteria are met:

- (i) **the housing will be Affordable Housing,**
- (ii) the development is immediately adjoining the settlements of [Gerrans...]
- (iii) the development is small scale [...]

Comment: As with HO3 and HO4, the policy is redrafted to clarify that it applies to all proposals for housing on Exception Sites, not just to proposals for Affordable Housing.

S7 - Environment Agency - Policy HO4 - should reflect the requirement that proposals should avoid areas at risk of flooding.

NPIERS - HO4 (ii) - need to cross refer to definition in Action HO6

S11 - Gerrans Parish Council - Section H – Policies for Future Development

- **Policy H05 Exception Sites – paragraph (1)**

No change to policies as concerned moving 'Affordable Housing' to a condition lowers strength of policy but refer to Cornwall Council Planning Dept for advice. Advice is to leave 'as is'.

Assessment for flood risk will be required for all new developments and will be incorporated in policy GPI.

Agree to include in pre-amble.

Adopted.

<p>The removal of the individual references to Bohortha, Trewithian and Rosevine was requested.</p> <p>48 – HO5 - Exception sites. While accepting the need for affordable housing I feel it should be made clear that ribbon development outside of villages or in hamlets will not be allowed.</p> <p>S13 - Natural England - We advise you that we disagree with the conclusion of the Cornwall Local Plan that there would be no Likely Significant Effect due to recreational boating in the Fal Estuary effecting the qualifying features of the SAC . This issue will need to be addressed in the Cornwall Local Plan and mitigation agreed in the higher level plan. Whilst the Neighbour Plan proposes containing any additional development within the settlement boundaries, we need to be mindful when considering the Neighbourhood Plan in –combination with other Plans. This includes the exceptions regarding affordable housing supported by market housing in the Local Plan Policy 3 and the overall CNA distribution of a total of 3 900 dwellings with 900 houses outside Truro, a significant proportion of these destined for settlements within the Neighbourhood Plan area.</p>	<p>Discussion with C Council (and indirectly with Natural England) led us to remove Policy HO5 and emphasis on exception sites. Changes made also to Housing Strategy pages to ensure clarity.</p>
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PAGE 42	PROPOSED ACTION & RATIONALE
<p>I3 – Policy HO5 – add</p> <p>(xv) an appropriate and agreed landscape plan is implemented in line with the RPDG *replaced by comment under 32 below*</p> <p>32 – HO5 add (xv) “An acceptable landscape scheme including both hard and soft works is provided in line with the Roseland Plan Design Guide”</p> <p>NPIERS - HO5 (vii) – delete “such as valley bottoms identified in the LLA”, insert “as identified by the Environment Agency”. This is procedurally more correct.</p> <p>(xi)- delete “any”, insert “living conditions enjoyed by adjoining residential properties.”</p>	<p>No change to the policy. This will be considered in the emerging Roseland Design Guide and the Roseland Development Checklist.</p> <p>No change to the policy. This will be considered in the emerging Roseland Design Guide and the Roseland development Checklist.</p> <p>Both adopted.</p>

PAGE 43	PROPOSED ACTION & RATIONALE
<p>16 - Action HO6 - I think the criteria need tightening to ensure they achieve what is intended. So, whilst (i) is clear and easy to interpret, (ii) would seem to allow someone who, say, moved to the Roseland aged 3, moving elsewhere in the UK or the rest of the world at age 13, to be eligible for affordable housing on the Roseland if they return to the area 50 or more years later. Perhaps a condition should be added which provides for evidence of a continued link with the area. On (iii) I think there needs to be some clarity on how soon a person employed in an essential service becomes entitled to apply for affordable housing and an emphasis on their role being a permanent one. Also, some way of ensuring that no-one can take up an essential service post, obtain affordable housing and immediately resign, retaining the housing, and having moved to a different job, possibly outside the area.</p> <p>19 - HO6 (iii) what is the definition of “essential public service” and there is no timescale with this criteria. Open to wide interpretation. I would recommend removal of (iii).</p> <p>25 – HO6 (iii) I feel this needs clarification. The terms “essential”, “public” and “service” need to be defined. Presumably “public” doesn’t mean “public sector”.</p> <p>32 – HO6 – why is this in a purple box not yellow?</p> <p>HO7 add “<u>ALL</u> subsequent”.</p> <p>35 - Policies HO6 and HO7 are they policies? HO6 could be but HO7 is purely a management issue not planning. It could relate however to schemes of affordable housing and this needs to be checked against Cornwall Local Plan policy.</p> <p>Need explanation of housing associations etc. what are they.</p> <p>34 - Policy HO6 <i>Comment: Can this Policy and/or the definition of Affordable Housing contain a reference which says that Affordable Housing should be managed by organisations which have agreed to work towards meeting the Community aspiration expressed in Action HO6 (i.e. a Roseland connection)? Is it legally permissible to limit permissions for Affordable Housing to housing which will be managed by an organisation which has agreed to work towards that Community aspiration for affordable housing to go</i></p>	<p>HO6 (i) and (ii) to be retained but (iii) will be deleted.</p> <p>Agreed - HO6 (iii) to be deleted.</p> <p>Agreed - HO6 (iii) to be deleted.</p> <p>HO6 is now yellow as now a policy. HO7 change adopted.</p> <p>HO6 now a policy and HO7 to remain a policy.</p> <p>Agreed - explanatory notes on housing associations to be inserted in the preamble together with preference for local Roseland-based organisations.</p> <p>Agreed - explanatory preamble to be inserted prior to HO7.</p>

<p><i>to those with a Roseland connection?</i></p> <p>Policy HO7: moved to definitions section.</p> <p>NPIERS - Not clear why HO6 is an Action and not a Policy. It has more weight as a policy. HO6 - needs to include “other members of their family and their dependents” (iii)-“Roseland based essential public services” is imprecise. Suggest replace with “have relocated to Roseland for employment and have a functional need to live close to their place of employment”.</p>	<p>No change to policy HO7.</p> <p>Adopted HO6 as policy with inserted words and (iii) deleted.</p>
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<p>PAGE 44</p>	<p>PROPOSED ACTION & RATIONALE</p>
<p>6 – Policy HO8 – Full Time Principal Residence Requirement – is there any way of extending this requirement to existing houses that are sold on the open market and thereby <u>become</u> second homes. We do not need more second homes!</p> <p>2 – Second homes – the law really does need to be changed to limit the number of second homes in villages. Second homes mostly are overpriced as investments so are very poor investments as the housing market may collapse any time now.</p> <p>4 - No-one can afford to build this (affordable housing) in isolation - I have seen that in other villages. Open market is what it says and only a change in the law of the land will prevent housing being used as the owner wishes. It could breach EU law.</p> <p>26 – Cornwall Local Plan - We think that planning permission should be sought when a residential dwelling is acquired, then used as a second home or holiday accommodation.</p> <p>34 - Policy HO8: <i>Comment: as currently drafted Policy HO8 does not expressly put in place the strategies for open market housing set out in E10, which states that there is to be no provision for open market housing on Exception Sites. Logically, it should also be expressly stated, rather than just implied, that open market housing within settlement boundaries should be subject to the same conditions that apply to Affordable Housing (other than the need for it to be affordable). The following redraft of HO8 makes these two points express:</i></p> <p>“HO8 Proposals for development (whether by new construction or by re-use or change of use of existing</p>	<p>Not possible. No change to the policy.</p> <p>This matter was discussed with Cornwall Council. Agreed to leave Policy HO8.</p> <p>No change to the document as an opinion.</p> <p>A good idea which will be discussed with Cornwall Council.</p> <p>Agree with clarifying the intention of the policy and indicating where open market housing can be built but feel better included in a preamble. Wording agreed with Cornwall Council Planning Dept.</p>

buildings) of open-market housing will not be permitted –

- (i) **outside settlement boundaries, unless it is a replacement dwelling as mentioned in HO9 or an extension or annex as mentioned in HO10, or**
- (ii) **within a settlement boundary unless it is demonstrated that the proposal complies with paragraphs (ii), (iii) and (iv) of Policy HO4 [NB these paragraph numbers refer to HO4 as redrafted above].**

Permission (other than permission under HO9 or HO10) will only be granted for Open Market Housing if that housing is subject to a requirement or condition, included in legally enforceable provisions imposed on the ownership of the housing and/or through the planning process, that the housing is occupied for at least 270 days per year as a Full Time Principal Residence.”

Further comment: The implication of the Housing Policies as a whole is that Affordable Housing is to be given preference over Open Market Housing Policy. This implication arises is based on the drafting of the HO policies as a whole, together with-

- (a) *the strong, clear preference demonstrated in the community responses to questionnaires (on which the Plan is based) to support affordable housing and to limit new open market housing: see Section C and in particular its summary that “development should, therefore, be limited, to meet genuine local need”,*
- (b) *the Objectives in E9.3 which state that the policies in the Plan are intended to support the provision of housing which meets a proven local need, the Overall Strategy in E10.1 which includes the strategy of providing housing to meet local need, and E10.2 which states that “the priority is to deliver Affordable Housing exclusively for local people, without the necessity of building open market housing.”*
- (c) *the summary of Section E which states that priority is given to Affordable Housing and to Commercial Development over Open Market Housing.*

*In order for the Policies to make express this priority for Affordable Housing and Commercial Development over Open Market Housing, condition (ii) in **Policy HO8** should be amended as follows–*

“(ii) within a settlement boundary unless it is demonstrated that *there is [(or will be)] no established need for Affordable Housing or Commercial Development within that settlement [during the Plan period] and the proposal complies with paragraphs (ii), (iii) and (iv) of Policy HO4 [NB these paragraph numbers refer to HO4 as redrafted above].*

NPIERS - Policy HO8 – it is not possible to apply conditions requiring a dwelling to be occupied for a certain number of days per annum. It is unenforceable and ‘ultra vires’ e.g. how do you monitor it realistically.

This also may be contrary to the Human Rights 1998 Article 8 relating to “respect for Private and Family life” in that it

Whilst we note this comment we are unable to accept it as (i) this policy reflects local opinion and (ii) it implies that human rights apply

<p>does not allow persons the freedom to use a dwelling in a reasonable manner. If this is correct the plan will not meet the basic conditions.</p>	<p>only to the economically advantaged, and not to those who are economically disadvantaged due to their local connection, who are forced to accept the threat of, and ultimately the dissolution of, their local community and way of life. This matter will be discussed with Cornwall Council. Advice is to leave 'as is' reflecting community wishes and wait for Examiner's view.</p>
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<p>PAGE 45</p>	<p>PROPOSED ACTION & RATIONALE</p>
<p>2 –Appropriate development – Some recent house development has been bad. Small houses replaced with huge houses on the same tiny plots. Mostly by second home owners just for money. Money which is becoming worthless due to inflation etc.</p> <p>13 – Policy HO9 – change paragraph (iv) to end ‘...; and follows all the principles set out in the RPDG’</p> <p>And add following:</p> <p>(viii) adequate parking is provided within the curtilage in line with the RPDG</p> <p>(ix) an appropriate and agreed landscape plan is agreed in line with the RPDG</p> <p>*superseded by 32 below*</p> <p>19 - HO9 (i) how is this defined. I would recommend removal.</p> <p>32 – HO9 add –</p> <p>(viii) existing boundary planting is retained and, where feasible, enhanced to both augment visual screening, and wildlife</p>	<p>No change to the document as an opinion</p> <p>No change to the policy as all these points will be covered by the Design Guide.</p> <p>Agree to delete from policy.</p> <p>No change to the policy as all these points will be covered by the Design</p>

<p>habitats</p> <p>(ix) ...standard phrase regarding parking</p> <p>(x) an acceptable landscape scheme including both hard and soft works is provided in line with the Roseland Plan Design Guide.</p> <p>35 - Policy HO9 replacement dwellings limited to permanent residency? Needs a rethink in terms of wording objectives and justification.</p> <p>34 - Policy HO9 [...] (ii) the volume [...] plus the maximum additional volume that could be generated using the maximum limits imposed for extensions under permitted development (which means, where appropriate, the maximum limits (if any) permitted in an AONB).</p> <p>S9 - CAD Architects - HO9 – Replacement Dwellings</p> <ul style="list-style-type: none"> • Replacement dwellings are a natural and necessary way in which to rejuvenate local housing stock. • Over time the needs of occupants and the nature of occupation changes and buildings to be successful must respond to such change. • The reuse of a previously developed site to provide a new dwelling will have less impact than a wholly new development. • Allowing replacement dwellings eases the pressure on villages and hamlets for plot sub-division and wholly new dwellings. • To artificially restrict the size and design of the replacement dwellings will be contrary to para 60 of the NPPF. The new dwelling should be designed to suit its current context and be suitable for modern living. Meeting the standards expected by the general population in terms of space, amenity and efficiency. Each proposal should be judged on its individual merits and should not be artificially limited by the original building, which itself may be sub-standard, at odds with its context or poorly designed. • Replacement dwellings should be seen as an opportunity to replace a dwelling of past relevance with one relevant to 21st Century. • The RNDP should include policies to require designers to submit proper assessments of context, character and design. Through such policy good design can be encouraged and poor design justly refused. <p>NPIERS - HO9- No need to refer to a “established and continuing residential use rights” as the LPA could take enforcement action to remove an unlawful dwelling.</p>	<p>Guide.</p> <p>No change to the policy.</p> <p>No change to the policy.</p> <p>No change to the policy. The philosophy of policy HO9 is based on community views and in general conformity with the NPPF.</p> <p>Wording of condition (ii) to be referred to Cornwall Council Planning Dept. New wording will be incorporated.</p> <p>Wording of condition (iv) based on the NPPF para 60 which states that it is proper to seek to promote or reinforce local distinctiveness.</p> <p>(i) Agree to delete</p>
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<p>(i) term “general need” is imprecise. Could just use the quoted examples? (ii) permitted development rights- see comments relating to policy HO3 (ii) above. (iii) (iv) & (v) it would be more consistent and clear to refer to Design Guide(s).</p>	<p>(ii) Referred to Cornwall Council Planning Dept. No change. (iii) Agree to add wording to both conditions.</p>
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<p>PAGE 46</p>	<p>PROPOSED ACTION & RATIONALE</p>
<p>16 - Policy HO10 - at (iii) the words "due consideration" do not go far enough, since only consideration is required, rather than a measurable outcome. Wording along the lines of "proportional garden space, trees, planting and landscaping in keeping with other dwellings in the surrounding area should be/to be/must be retained."</p>	<p>No change to the policy. Could be considered in emerging Roseland Design Guide</p>
<p>32 – HO10 - Is it sufficient to say “subsidiary in size” to the existing development? In theory an annexe could be 99% of the existing size thereby almost doubling the size of the addition! Can we legally set a maximum % size for annex? Say 50% or better even less? Why not use the permitted development criteria see HO3 (ii).</p>	<p>No change to the policy as felt impractical.</p>
<p>34 - Policy HO10 [...] (ia) there is no significant adverse visual impact from areas to which the public have access <i>Comment: this would be a new policy condition which is the logical counterpart in HO10 of the provision currently in HO9 (iii).</i></p>	<p>No change to the policy as felt unreasonable</p>
<p>S9 - CAD Architects - HO 10 ii</p> <ul style="list-style-type: none"> • States that the extension or annex should be subsidiary in size and sympathetic to the character of the existing building. • The extension or annex must respond to context as a first principle. The existing building may be of little or no character or it may be disproportionately small. In both these cases a well-designed, properly considered extension can provide the character that is lacking and produce through addition, a dwelling that meets todays requirements for space and light, whilst enhancing the character of the wider area. • The RNDP should include policies to require designers to submit proper assessments of context, character and design. Through such policy good design can be encouraged and poor design justly refused. 	<p>No change to the policy. We agree that the context and local character should be respected. 'Today's requirements' are opinion for which we have no evidence in our community consultation.</p>
<p>NPIERS - HO10- (iv) –just refer to Design Guide; (vi)-not necessary in small extensions, refer to ‘large scale</p>	

extensions/annexes.	Agree to add wording to condition (iv) Agree to change (vi) to start 'for large scale extensions/annexes'
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PAGE 47	PROPOSED ACTION & RATIONALE
<p>23 – I think the Plan is very good but a bit weak on page 47 re commercial development. One of the residents at Crohans has told me the site for landfill is bringing in waste from Wales as the lorries number about 20 a day, he is very unhappy. If all the farmers start filling in holes on their land you can imagine what the place will look like.</p> <p>Can we look at commercial development being curtailed in scale to prevent the character of the area being destroyed?</p> <p>35 - There is a mix of the words commercial and economic that does not make clear the intent of the plan to support economic growth where there is no harm to the landscape, wildlife and other local values that the community have identified, Reword CDI to correct this.</p> <ul style="list-style-type: none"> - The following paragraph should be reworded to recognise that there are benefits as well as costs where there is economic development. <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p>The quality of the landscape and its wildlife is a key factor in people locating here to live or work. This is a significant economic, as well as an environmental asset, and must be taken into account in calculating the cost <i>and/or benefit</i> of any</p> </div> <p>34 - <i>The provisions of Policy CDI seem largely suitable for all non-residential development of this type, but I suggest that the titles to section H19 and Policy CDI are changed to encompass this larger scope, and that Policy CDI starts –</i></p> <p>“Policy CDI Proposals for economic development, premises for business [and for other development such as infrastructure development] may be permitted where it has been demonstrated that – [...]</p> <ul style="list-style-type: none"> (vi) any extension or additions to an existing complex are sympathetic [...] (vii) [...] the design and layout of the development is sympathetic to and creates a minimal impact upon the 	<p>No change to the document as feel present policies adequate</p> <p>Agree to review the wording of the preamble.</p> <p>No change to the policy as no mandate to include infrastructure. C Council advice is to change wording of Important Note to say that infrastructure developments should be read in the context of Commercial development policies.</p>

character of its location and the surrounding landscape

- (viii)
- (ix)
- (x)
- (xi)
- (xii) the development **will** be suitably landscaped [...]
- (xiii) external storage areas **will** be appropriately landscaped [...]
- (xiv) the development **will** not cause a new or exacerbate an existing pollution [...]
- (xv) adequate provision **has been** made for the disposal of foul and surface water [..]”

S9 - CAD Architects - HI9 Commercial Development

- The AONB is the result of thousands of years of intervention by humans on the landscape. The only truly natural environment is that small margin between cultivation and sea.
- It follows therefore that the majority of the AONB landscape has and is continuously evolving to meet the needs of the population.
- Farming is the largest industry in Cornwall and makes up the majority of our GDP.
- The consolidation of farms into larger units has changed the nature of farm buildings as the many smaller buildings make way for fewer larger buildings.
- This change is an inevitable part of changes in farming practice and this essential industry must be allowed to flourish.
- It should be remembered that commercial farm buildings generally have a much shorter life span than dwellings.
- Commerce is essential to a vibrant community and well planned well located proposals for commercial development providing employment should be considered favourably.
- The RNDP should identify sites for expansion or new sites to provide additional employment.

24 – I just feel that the number of constraints that are there will prevent any new commercial activities on the Roseland and this in turn will affect employment. There are times when larger developments are needed as smaller ones are not commercially viable. I do agree however that larger developments should not have a huge visual impact on villages/coastline etc.

NPIERS - CD1- Again, qualify what is meant by commercial development by reference to Use Classes Order (see E10 above – page 21). There is an element of repetition, policies (v) & (vi) could be covered by reference to Design Guide.

Most comments are consistent with the Plan policies. Regarding the last point – applicants will identify sites which will be considered on a case-by-case basis using the Plan criteria.

Opinion. No change to the document.

Refer to Cornwall Council Planning Dept for advice. Advice is to leave 'as is'. Use classes change (too)

<p>48 - H19 - Commercial development (and other development, but thinking of the Pendower and Nare hotels) I would suggest that the plan refers to taking account of coastal erosion and flooding issues, especially as sea level is expected to rise by a metre this century and there is a danger that as erosion takes place affected businesses will want to put in place big concrete and steel defences. I see that the area around Carne beach is mapped as an area of coastal realignment. In addition might it be appropriate to refer to Commercial Development having to provide local employment and capacity building activity?</p> <p>46 - H19 Need to make reference to tall structures other than wind turbines - 4G PHONE MASTS</p> <p>I believe that the Roseland should have good 4G mobile phone coverage. Unlike wind turbines, there is a clear community benefit. However the challenge is to install them so that the visual impact is minimised. Rather than just react to individual applications for phone masts (which will often be driven by personal benefit to the landowner), I would like to see the Plan take a more proactive approach to produce a coverage strategy which will minimise the number of masts and will choose their locations, height and design with detailed guidance from the LLCA. Clearly this would have to be done in partnership with the relevant authorities. The benefits of such a partnership approach have been demonstrated by the initiatives that were taken to work closely with BT to maximise the Superfast Broadband coverage on the Roseland. This could be listed as one of the priority Implementation Projects</p> <p>H19 & CDI - MILITARY AND GOVERNMENT BUILDINGS</p> <p>The Plan categorises building essentially into Residential and Commercial. I think it would be wise to extend the scope of the “Commercial” designation to read “Commercial, Military and Government Development”</p>	<p>frequently.</p> <p>Assessment of the flood risk has been included in policy GPI. Coastal erosion is covered by the Shoreline Management Plan. Sea defences are covered by policy LA4.</p> <p>The preamble will be amended to state the benefits of commercial development.</p> <p>Clarification to be sought from Cornwall Council Planning Dept re: whether our current commercial development policies would cover these categories adequately. Advice is to say that infrastructure developments should be read in the context of Commercial development policies.</p>
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PAGE 48	PROPOSED ACTION & RATIONALE
31 - Policy CDI commercial development	

<p>(iii) 'the development does not involve building on...' Add in here 'or immediately adjacent to' '...land subject to statutory and non-statutory designations for wildlife and geological value...'</p> <p>(xviii proposed) 'no major development as defined by TCPI 2184 (2010) will be permitted within the Roseland AONB except in exceptional circumstances'</p> <p>'maximum limits under permitted development' are mentioned in other sections. Are there maximum limits for commercial development? If so a CD policy to this effect should be included.</p> <p>Commercial development outside settlement boundaries. Does commercial development have to conform to rules on exception sites, as housing does? If so a CD policy to this effect should be included.</p>	<p>Amendment to CD1 (iii) adopted</p> <p>Proposed (xviii) and maximum limits - referred to Cornwall Council Planning Dept. Advised to use Tamar Valley documentation re: major developments.</p> <p>Yes, as has to conform to GP3.</p>
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<p>PAGE 49</p>	<p>PROPOSED ACTION & RATIONALE</p>
<p>13 – Policy CD2 – add following:</p> <p>(viii) adequate parking is provided within the site curtilage in line with the RPDG</p> <p>(ix) an appropriate and agreed landscape plan is agreed in line with the RPDG</p> <p>19 - Para3 starting “Recent changes...” I have read this sentence a number of times and don’t think it makes sense (happy to be shown why I am wrong).</p> <p>35 - Policy CD2 is about the reuse of farm buildings not land. It should also apply to farm buildings inside as well as outside settlements. The title of this section should be reworded to reflect this:</p> <div data-bbox="152 1114 1451 1220" style="border: 1px solid black; padding: 5px;"> <p>H19.2 Re-use of Farm Buildings and Land in for <i>Business and Light Industrial Uses</i> Commercial Use outside Settlements</p> </div> <p>Policy CD2 is unclear what uses it would support moving between commercial and business uses. Because of the nature of the buildings available and the mix of economic activity in the Plan area I would suggest that business and light industrial</p>	<p>No change to the policy as already covered in policy CD1 (which we will make clear also applies to CD2 and CD3).</p> <p>Agree need to rewrite this paragraph.</p> <p>Agree to reduce heading to ‘Re-use of Farm Buildings’</p> <p>In policy CD2 will remove ‘and Land’ from the heading and agree to delete the words ‘outside the settlements’.</p>

uses would be appropriate. The following wording is recommended.

Policy CD2 - Re-use of Farm Buildings and Land. The reuse of farm and rural buildings ~~outside the settlements~~ for business and light industrial uses ~~purposes~~ will be supported subject to the following criteria:

34 - Policy CD2 Proposals for the reuse of farm and rural buildings outside the settlements for economic development, premises for business [and for other development such as infrastructure development] may be permitted where it has been demonstrated that –

- (i) the building [...] is sympathetic to and creates a minimal impact upon the character of its location **and the surrounding landscape**
- (ii) **the area of previously developed land is not increased and** the building is capable of conversion [...] the maximum limits imposed for extensions under permitted development (**which means, where appropriate, the maximum limits (if any) permitted in an AONB.**)
- (iii) the conversion **will** use [...]
- (iv) the conversion **will** not result [...]
- (v) appropriate provision **has been made** for the protection
- (vi) special care has been taken to **put in place restrictions and conditions which** ensure [...] roosts **will not be** disturbed
- (vii) [...]
- (viii) **the proposal meets the criteria set out in Policy CD1 paragraphs (viii) to (xi) and (xiii) to (xvii)**

Proposals for development for [economic development or] business use on land already in commercial use outside the settlements may be permitted where it has been demonstrated that –

- (i) the site at the time of the application does not have **landscape or** conservation value and makes a negative contribution to the character of the local area, **and**
- (ii) the proposed use is compatible with surrounding land uses and will not result in the appearance and character of the landscape and open countryside being adversely affected ~~by the effect of minor residential activities and structures.~~
- (iii) **the proposal meets the criteria set out in Policy CD1 paragraphs (iii) to (xvii)**

S9 - CAD Architects - CD2

- By virtue of statements i & ii policy CD2 seems to encourage redundant buildings to remain unused. To be allowed to fall into dis-repair. It seems the policy would rather the building was removed than reused.

No change to the policy but will state clearly in the preamble that the criteria in policy CD1 also apply to policies CD2 and CD3.

No change in policy. We agree that reuse of buildings should be encouraged and are perplexed by

<ul style="list-style-type: none"> • The reuse of an existing building is efficient in terms of the environmental impact, as the materials used for the building remain useful and a new building with new materials is not required. • The reuse of an existing building will have no additional impact on the environment or visual amenity, other than possible improvements. • Rather than seek to restrict in a negative sense the policy should seek consequential improvement. If the visual amenity can be improved through landscaping or the building's appearance improved by re-cladding or re-decoration, then this should be the aim. <p>S7 - Environment Agency - Policy CD2 – should reflect the need for any necessary flood mitigation where required.</p> <p>NPIERS - CD2 (ii) same comments relating to permitted development, as above in HO3 (ii). (Page 40)</p> <p>47 – CD2 – concern that newly erected farm shelter/buildings may not need planning permission for change of use as the motivation for erecting new shelters may be to capitalise in this policy.</p>	<p>your interpretation of criteria (i) and (ii).</p> <p>This has been incorporated in policy GPI. Attempt to agree more precise/simpler wording with Cornwall Council Planning Dept. We cannot control permitted development rights.</p>
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PAGE 50	PROPOSED ACTION & RATIONALE
<p>13 – Policy CD3 – surely this needs to be expanded and be at least as explicit as policies CD1 and CD2. It should be made clear that agricultural barns that exceed the permitted development rights and require planning permission will require a Development Management Toolkit assessment to be undertaken, <u>and</u> if falling into the “major development” category as defined by Cornwall Council a full Landscape and Visual Impact Assessment (LVIA) <u>including</u> a full ZVI Zone of Visual Influence assessment will be required</p> <p>*Also see 32 below*</p> <p>32 – CD3 This policy is particularly key to visual intrusion in the countryside and should have at least as many itemised criteria as CD2 and all of the HO policies. Confused because the NDP Design Guide (based on Carrick DC) has Agricultural buildings in section 4.2, what does section 10 of the Cornwall design guide say? More work needed on CD3. May even need to add the requirement for LVIA and ZVI as per CR2 Wind Turbines.</p> <p>NPIERS - H19.3 - no need to exclude prior approval which relates to consideration of design and siting.</p>	<p>We will add Important Note 3 stating that the criteria in policy CD1 apply to policies CD2 and CD3 as well.</p> <p>We will add Important Note 3 stating that the criteria in policy CD1 apply to policies CD2 and CD3 as well.</p>

<p>CD3 - qualify reference to Roseland Plan Design Guide which has not yet been prepared.</p> <p>49 - CD.3 To control light pollution agricultural buildings should not have skylights. If skylights are approved the skylights should be closed off to the sky from dusk to dawn by condition.</p>	<p>H19.3 – agreed. Advice on wording from Cornwall Council Planning Dept. Rewording of preamble to CD3 makes it clear that proposals subject to prior approval can be required to submit for planning approval. CD3 - agreed.</p> <p>Refer to policy CD1 (xiv) which applies to all commercial developments.</p>
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PAGE 51	PROPOSED ACTION & RATIONALE
<p>13 – First paragraph under Introduction change ending to:</p> <p>...(use of productive farmland, negative visual impacts on the character of the landscape or of Roseland villages and hamlets and the widespread impression that individual gain rather than community sustainability is driving these technologies).</p> <p>35 - Section H needs a sub-objective H20.5 and a corresponding policy to address communication infrastructure such as masts, aerials, antenna and satellite dishes. Such developments can be as visually intrusive as Wind Turbines but are critical to the vitality of local communities so clear policy guidance should be given to network operators and their infrastructure suppliers to assist in maintaining a high standard of information technology in the Plan area.</p> <p>47 - H20 – suggest promoting energy saving national initiatives to local residents.</p>	<p>No change to the document. No objective evidence available to support this impression.</p> <p>This type of structure should be covered under policy CD1 and more generally by other Landscape and Village Character policies</p> <p>Will be considered as part of delivery project.</p>

PAGE 52	PROPOSED ACTION & RATIONALE
<p>31 - Policy CR1 Energy saving measures - Insert: ‘provided that all other requirements are met,’ ‘...permission for</p>	<p>No change as all policies apply – see</p>

installation... will be granted...'	Important Notes 1 and 2.
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PAGE 53	PROPOSED ACTION & RATIONALE
<p>I - Policy CR2 (v) refers to "lowest part of the blade <u>less</u> than 5m from the ground" This seems to be dangerously low and I was not sure whether it was meant to read <u>more</u> than 5m from the ground.</p> <p>S4 - St Mawes and St Just in Roseland Society - There is however, one reservation, that in section 20.2 on Wind Turbines we believe that even turbines of 11.1 metres, ground to blade tip could spoil the Peninsular unless a very restrictive approach is taken.</p> <p>42 - POLICY CR2 - Although the policy conditions are stringent regarding the siting of micro-turbines, I am very disappointed that any wind turbines would be permitted in the AONB since there was a clear majority of residents who voted for NO TURBINES in Questionnaire 2. Since the amount of electricity generated from a micro-turbine would be very small, I cannot understand why the landscape of the AONB should be, in any way, under threat from this sort of structure. Cornwall, as a whole, has been ravaged by wind turbines. Is it too much to ask that, at least, the AONB should be exempt?</p>	<p>Agreed, will be corrected.</p> <p>Agreed, hence taken restrictive approach.</p> <p>No change to the policy as an opinion.</p>

PAGE 54	PROPOSED ACTION & RATIONALE
<p>I - Energy reduction H 20. I note solar panels on housing refers to photo voltaic panels. I believe these to be more popular than solar heating panels because they attract government subsidies. However from a visual point of view, solar panels filled with water or oil are similar, and should probably be put in the plan. It might be with future technology advances, that large scale solar (liquid) installations (solar farms) which can convert the stored energy into electricity could be designed, though doubtful from a cost point of view. However we would not want something to be approved because there was not a policy to protect against it.</p> <p>13 – Policy CR3 – change ending to: ‘...or solar slates will be employed.’</p> <p>35 - Wording of title for policy CR3 should be consistent with policy CR4 and read:</p>	<p>No change to the policy but an explanation will be included in the preamble.</p> <p>No change to the policy as cannot enforce. Adopted.</p>

<p>Policy CR3 - Low Impact Solar Panels.</p>		<p>This has been incorporated in policy GP4. No change to the policy as an opinion.</p>
<p>S7 - Environment Agency - Policy CR4 – proposals should avoid areas at risk of flooding.</p>		
<p>49 - CR3 It is known that solar panels have received consent elsewhere. However, do the residents of Portloe and Veyan wish them on their listed buildings even if tiles? No one is forced to purchase a listed building. I would like to see none.</p>		

<p>PAGE 55</p>	<p>PROPOSED ACTION & RATIONALE</p>
<p>32 – CR5 - these policies seem rather general. Maybe more specific criteria need to be listed for specific methods e.g. tidal mills, digesters.</p> <p>NPIERS - H20.4 – second para. reference to section 121- not sure where to find this ?</p>	<p>No change to the policy but likely to be included in the Carbon Reduction Implementation Project. Agree to change typeface to clarify should be letter I not number 1.</p>

<p>PAGE 57</p>	<p>PROPOSED ACTION & RATIONALE</p>
<p>7 – While the focus has been on documenting what Roseland residents want as the future of our patch, I can see that the trick now will be to use the Plan to represent these views, to implement the wishes and to resist outside influences that act against the content of the Plan.</p> <p>The section on implementing the Plan is but one page, backed up by Annexes such as Annex K on possible future projects. The risk is that after a huge effort by you all to produce the Plan, that effort is not sustained through implementation (to 2030!). I suggest the following:</p> <p>a) That the risks to being able to implement the Plan are documented (an example might be the housing targets agreed recently for Cornwall), and potential ways of mitigating these risks are identified</p> <p>b) That a draft action plan is developed. This should include addressing the risks identified above. While the list of projects is a start, it doesn't provide any detail of who will do what, when, how and with what resources. It is recognised that such an action plan has to evolve over time. The action plan should identify potential allies (government departments,</p>	<p>No change to the document but the importance of delivery is understood. Several potential implementation/delivery projects have been identified and a detailed implementation project will be developed.</p>

<p>NGOs , volunteer groups, businesses, champions, Hub Radio...)</p> <p>c) That somehow a Plan Implementation Coordination Group evolves out of the present RNPSG. The present SG has proved its competency and legitimacy, but would probably need to modify its membership for this new role. While full time employed at the moment and therefore unable to take an active role, I'm hoping to reduce work commitments in the next year or so and would hope to be able play a small, positive role in the future.</p> <p>19 – Second paragraph “Regular review ever 12-18 months...” Given the amount of process, time and effort required, I would think that triennial review would be sufficient.</p> <p>31 - Implementation of the plan: delivery projects heading missing from right hand column. Deliverable is not a noun! (cf ‘eats shoots and leaves’.) How about ‘commitment’?</p> <p>How will the Plan be enforced? How will its abuses and abusers be prosecuted??</p> <p>NPIERS - No evidence of a full project plan or consideration of committee cycles but the Plan has progressed efficiently to an advanced stage. There is a list of projects emanating from the plan in Section I and appendix K27 to the Plan which are a clear guides to implementation. Would be useful to have a cross reference to K27 in Section I.</p> <p>49 - I. 21 Implemental of the Plan. Once in being implementation to encourage community and public confidence in the Neighbourhood Plan Veryan Parish Council or the area will delegate an councillor to monitor the implementation of planning permissions including listed building consents, investigate alleged cases of unauthorised development and ensure action is taken where it is appropriate to do so and inform the Parish Council which will minute the information.</p>	<p>Wording amended to ‘Formal reviews every 2 years’</p> <p>No change as heading is for section not column. No change to wording as 'deliverable' is widely understood and used.</p> <p>The project plan is on the website. It will be reviewed prior to submission and Committee cycles added.</p> <p>Reference to Appendix K27 is already shown in the paragraph below the table of projects. The subjects raised form part of the Implementation/Delivery Project portfolio.</p>
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PAGE 61	PROPOSED ACTION & RATIONALE
NPIERS - J23- suggest putting links to documents on the web site.	Agreed. This will be completed post submission.

1. Need to keep rural character of existing and new roads, in particular avoiding unnecessary road markings, avoiding new stretches of kerb outside village centres, any essential new kerb in village centres to be granite rather than concrete.
2. Avoid unnecessary new road signage/retain historic signage and milestones.
3. No new street lighting, replacement street lighting to be “dark skies” friendly.
4. Retain existing Cornish hedging and traditional village styles of stone walling.
5. New boundaries alongside roads and footpaths to be Cornish hedging, traditional stone walling or native planting. Unsuitable walling, fencing and non-native planting to be avoided (I am sure we can all think of examples of unsympathetic walling/fencing/planting along public highways and footpaths on the Roseland).
6. Native planting e.g. on Cornish hedging, tree tunnels to be retained, maintenance such as grass cutting scheduled to enhance wildflowers where practicable.
7. Retaining traditional stone stiles on footpaths (e.g. new kissing gates for accessibility to be alongside existing stone stiles rather than destroying them).

Parking places used by the public, and parking places visible from the highway, should also comply with these rules to the extent practicable, so as to maintain the coherence of the road landscape of the Roseland.

Landscape at night

The quality of the landscape of the Roseland at night is important to local people and to tourism – see <http://www.britastro.org/dark-skies/> for the importance of dark skies, which cut down on light pollution, reduce the effects of unnatural lighting and reduce energy needs.

Dark skies on the Roseland should be an entry in the Landscape Character Assessment. The Design Guide should refer to appropriate standards for outdoor lighting so that no new light pollution is created, and hopefully existing levels of light pollution are reduced.

It should be a general condition of all planning permissions that any outdoor lighting which is part of the development will not create light pollution, for instance by being required to follow the Lighting Guidelines of the Campaign for Dark Skies http://www.britastro.org/dark-skies/pdfs/CfDS_guidelines.pdf

Roseland Development Checklist

This could turn out to be a very useful document. However, I am a little concerned that, as drafted, it could turn out to be something on which people just put in “yes” or “no” with no further detail, which would limit its use. So, could questions 2

To be considered in the Roseland Design Guide and Roseland Village Assessment.

Some re-design of the document to

and 5 be redrafted to ask, e.g. –

2. **How** has your proposed development taken account of the Roseland Design Guide in terms of Appearance? Materials? Scale?
5. **How** have you been able to incorporate energy saving technology...

In question 3, what document will contain the explanation of the need for the development – is there a requirement for such an explanation in the current planning process? If not, should the question be “Have you included in the documents accompanying your application a clear explanation of the need for the development?”

25 - Secondly, just an observation. Grade 3b agricultural land is referred to by the plan several times, and the distinction between grade 3a and 3b is significant in planning terms. However, I couldn't find reference in the plan to a source to identify the classification of particular parcels of land. I'm no expert, but I believe I have found a suitable official data source, to which I have placed a link below:

<http://magic.defra.gov.uk/MagicMap.aspx>

Perhaps it would be useful to add this reference, or a similar one, to the appendices.

31 - June Crossland asked me to comment on the LLCAs. I don't have much to say except that I've skimmed them and they seem to do a good job of proving an evidence base, which I think is what they are designed to do. I know how much work went into providing this level of detail, so it's a great achievement.

45 – K24 Sustainability Analysis – I like this. Sets the over-riding parameters

K25 Roseland Development Checklist – Add question – Will you undertake to ensure protection of wildlife species and flora on site? E.g. provide for owls/swifts/bats; ensure wild flowers/native hedges are undisturbed.

K26 Judging Landscape Capacity - A superb document. Central to issues. Must be adopted!!

K27 Potential Project List - I am willing to 'champion' WEA, CWT etc. wildlife habitat enhancement. Has anyone considered adding 'living churchyards', and/or village green projects? Or production of booklet “Wildlife on the Roseland”?

be considered.

The agri land maps are in Appendix K30.

Thank you for your support.

Thank you for your support.

Some redesign of Checklist will take place.

Thank you for your support.

Has been noted! Thank you for your support.

K28 Roseland Area Profile – 5 parishes and 1 settlement – Brilliant. Well done Graham

K29 Roseland LLCA Report – needs much work.

Parish sub headings have been omitted. Without them the document takes some unravelling, because specific comments about a parish can be taken to read as the LLCA for all the district.

Many omissions, considerable repetition. Also style – sometimes sentences, sometimes notes.

Errors:

3.3.2 – There are no red kites!! (Except rarely in May!) Cirl bunting project still not mentioned - must be. Historic churches/wells/quays not mentioned

3.3.3 – Pressures include widening of field gates

3.4.1 – Directly contradicts 3.3.2 re woodland

(?) 3.4.2 – Weasels/stoats – not ferrets. Great spotted woodpeckers. Add siskins in conifers/alders

3.5.2 - Little owl is a rarity in Cornwall! Spotted woodpeckers - should be 'Great spotted'. Melissa - should be Melinsey

3.6.2 – White egrets – should be little egrets. Add to Biodiversity – Fal-Ruan nature reserve/SSSI status reflects importance of biodiversity here

3.7.2 – Also add to Biodiversity – Gull Rock island off Nare Head supports significant population of seabirds – guillemot, razorbill, shag, great black backed gulls and herring gulls. Add early summer orchids on Treluggan cliffs.

Transport – Portscatho P&D car park not included

Condition – Add to litter picking – 'organised by the National Trust each month'

4.3.2 – Add Veryan Players and annual village pantomimes

Thank you for your support.

These changes will be incorporated into the LLCA.

4.5.2 – I think 'Island Rock' is much better known as Gull Rock. Also Nare beach is Carne/Pendower beach

K30 Maps, listed Buildings etc. – 5. Areas of Great Scientific Value, Cornwall Geology Sites, Cornwall Wildlife Sites

Maps - geo_nature_-_ruanlanihorne_parish_a1.pdf and geo_nature_-_philleigh_parish_a1.pdf – the Fal-Ruan nature reserves which are indicated by the sign opposite Ruan Quay are not marked. I have the boundary details on separate map documents

K31 Carrick Design Guide – Useful framework. As also is Carrick's environmental issues guidelines document

S5 - National Trust - The **National Trust** welcomes the Roseland Local Landscape Character Assessment as a tool to take the Roseland Plan forward.

However, when the Local Landscape Character Assessment was tested there appeared inconsistencies in the information produced. For example with regard to the Pendower and Nare hotels, on the basis of the parish maps of landscape character types, these developments appear to be located in the 'Steep Sided Valley' landscape character type, but according to the 'Local landscape Character Assessment' (para 3.7.2), and the landscape tables for landscape character types (appendix 4.6), they are located within the 'Cliffs' landscape type. This discrepancy has important implications in establishing the relevant landscape, management and development considerations.

Also, the Assessment (page 33) and Appendix 4.6 table (under 'Roseland Plan') indicate that Portscatho and Portloe are sited within the 'Cliffs' landscape type. However, on the basis of the parish maps of landscape character types, Portloe appears to be located in the 'Steep Sided Valley' landscape character type, and the Assessment itself under 'Steep Sided Valley' states that in Portloe "dwellings are tightly clustered in the valley" (page 22). Under Appendix 3.5, the table for Veryan, states under the settlement pattern for 'Cliffs' that there are only "a few clusters adjacent to coastal edge". As regards Portscatho, Appendix 3.2, the table for Gerrans, states under the settlement pattern for 'Cliffs' that there are no buildings within this type apart from the coastguard look out and a shack.

It is also confusing that when the assessment is of character types (and the page 3 – contents title for Appendix 4 refers to tables for each landscape character type), the tables themselves, under Appendix 4, refer to character areas, and under Appendix 4.6 for instance it states "Portscatho and Portloe are sited within this character area".

The Assessment, tables, and maps need tightening up to be effective and to provide certainty.

This map will be checked.

Thank you for your support.

The relationship between the Parish tables and the Parish plans of the landscape types will be checked and amended where required.

APPENDED LETTERS, EMAILS

I. SI - CAA

Safety and Airspace Regulation Group

Airspace, ATM and Aerodromes

Jon Smith, Chairman, Roseland Neighbourhood Plan Steering Group

24 July 2014

Dear Mr Smith

CONSULTATION ON PLANNING MATTERS

While the CAA has a duty to provide aviation safety advice when requested, it is not a statutory consultee for planning applications (unless its own property is affected). In order to reduce the time devoted to unnecessary consultations, the following guidance aims to clarify requirements.

Other than the consultation required by Section 110 of the Localism Act 2011, it is **not** necessary to consult the CAA about:

- Strategic Planning Documents (e.g. Local Development Framework and Core Strategy documents) other than those with direct aviation involvement (e.g. Regional Renewable Energy Plans);
- Waste Plans;
- Screening Options;
- Low-rise structures, including telecommunication masts. With the exception of wind turbine developments, the CAA is unlikely to have any meaningful input related to applications associated with structures of a height of 100 feet or less that are situated away from aerodromes or other landing sites;
- Orders affecting Rights of Way or Footpaths;
- Sub-surface developments;
- General planning applications not affecting CAA property.
- Solar Photovoltaic Panels (SPV)

In all cases where the above might affect an airport, the **airport operator** is the appropriate consultee. Where the above might affect a NATS installation the consultee is:

NATS, Mailbox 27, NATS Corporate and Technical Centre, 4000 Parkway, Whiteley, Fareham, Hants PO15 7FL

Please be advised that we will no longer respond to future correspondence received regarding the above subjects. Where consultation is required under Section 110 of the Localism Act 2011 the CAA will only respond to specific questions (but will nevertheless record the receipt of all consultations).

It **is** necessary to consult the CAA in the following situations:

- When a Local Planning Authority is minded to grant permission for a development to which a statutorily safeguarded airport or NATS Plc has objected, write to:

Aerodrome and Air Traffic Standards Division, Civil Aviation Authority, Aviation House, Gatwick Airport, West Sussex RH6 0YR

- When a Local Planning Authority is considering a proposed development involving wind turbines, write to:

Renewal Energy Project Officer, Directorate of Airspace Policy, Civil Aviation Authority, CAA House, 45-59 Kingsway, London WC2B 6TE

email: windfarms@caa.co.uk (preferred option)

- When a development involves structures of a height of 90 metres or more, lasers or floodlights, write to:

Off Route Airspace 5, Directorate of Airspace Policy, Civil Aviation Authority, CAA House, 45-59 Kingsway, London WC2B 6TE

Email: marks.smailes@caa.co.uk

Further information on consultation requirements can be found on the CAA website, including document entitled [Guidance on CAA Planning Consultation Requirements](#).

Further information on Solar Photovoltaic Panels can be found on the CAA website including document entitled [Guidance on Photovoltaic systems](#).

Please could you ensure that your Planning Officers are aware of these principles and the revised policy and that **any associated procedures are amended with immediate effect**.

Yours faithfully

E.FORREST

AAA Business and Oversight Support Team

Regulatory Coordination & Operations Planning

Airspace, ATM and Aerodromes

Civil Aviation Authority

1NE Aviation House Gatwick Airport South West Sussex England RH6 0YR

Telephone 01293 573339 Fax 01293 573971 www.caa.co.uk

2. S3 - FAL RIVER



Jon Smith
Roseland Neighbourhood Plan Steering Group
Little Treviles
Ruan Highlanes
Truro
TR2 5NR

Dear Jon

Thanks for the opportunity to be involved in the final draft and consultation and as mentioned in the past, I believe the best way to have business input into the plan is through a selection of businesses meeting to review the existing plan and make some recommendations. So this morning we had our initial meeting with Toby Ashworth and Mark Hatwood from Roseland Online and we have agreed to host a couple of meetings on the Roseland to discuss how we can add benefit to the area in the future based on economy, infrastructure, environment and finally sustainability.

We all agreed that your team have done a fantastic job and are acutely aware that it has been hard to get a unified business voice and plan to make up for this by providing for you, within the six weeks consultation phase, a comprehensive review of the plan from a business point of view. We would welcome your views on this and indeed would welcome one of your steering group to attend the meetings.

We plan to set up a Roseland Business Network that will be hosted virtually through Roseland Online and will canvas widely those who may not have had a voice for whatever reason from a business point of view - a view, which I'm sure you'll agree, is imperative to the Roseland's continued growth and sustainability, regardless of the residential status of its owner.

Once again, well done to all on a really comprehensive piece of work and hope that we can help with the final consultation.

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3. S8 - THE NARE HOTEL

From: Nare MD's Office [mailto:tgha@narehotel.co.uk]

Sent: 13 September 2014 01:24

To: info@roselandplan.org

Subject: Roseland Plan feedback

Jon Smith ,

Chairman of The Roseland Plan

Dear Jon,

Thank you very much for giving us the opportunity to become involved with the draft Roseland Plan. We have discussed the matter several times on a one to one basis and as you know I am very supportive of the concept and enthusiastic for a Roseland Plan. I have expressed a business desire to see it come to fruition since it would have helped enormously if such a plan had been available prior to our planning application last year. I also note that you have put much effort into ensuring this plan progresses and you, your committee and volunteers should be commended for that. It needs, absolutely, whole community drive and ownership.

My concern all along has been that the balance of the input should be from the whole community and not just a sub set of that community in favour of one particular view.

I attended an open meeting in St Mawes at the early stages of the proposal. The matter of the composition of the steering group was being discussed. It was pointed out that the youngest member in the room was in her 40s and there was a complete lack of attendance of the younger population. I also requested that there should be appropriate representation from the business community, and not just representation of the electoral roll, through Parish Councillors. I am sorry that this has not been taken up.

I refer initially to the research into posing of the questions sent by post to the electoral roll. I understand these questions were proposed and developed by the initial feedback only from the electoral roll. I am sorry there was not the opportunity for businesses to input into these scoping questions for the survey. I do believe however the survey has come up with the wholly expected results of the overall desire to protect the beauty, natural habitat and sensitive environment. I don't think anyone would argue against that desire, and I must add I do fully support that shared desire. The survey was fine as far as it goes – it was the equivalent of asking children to vote for Christmas. Unfortunately I do not believe it is adequately dealing with the much more difficult question of the interaction and balance between economics, the need for businesses to continue, flourish or grow, and for the well-established desire to protect the environment. This balance is the very nub of the challenges the Friends of Pendower Beach have omitted to address when objecting to several notable planning applications. There is the need for the plan to be consistent with local planning requirements and the National Planning Policy Framework. I think it is unfortunate therefore that the drive and promotion of the plan so far has been closely associated and obviously tainted by individuals closely linked with the said pressure group and a voter profile akin to it. (This comment is backed up from a good number of residents). My concern is that the Roseland Plan is in grave danger of becoming rejected as it passes further up the line for scrutiny because it has not properly and widely consulted with all parties, in particular the business community, the younger population, the non-residents who work on the Roseland, young residents who are educated off the Roseland, and the-harder-to-reach sectors. I am advised this is a crucial requirement for the plan to be accepted. I raise this point simply because I do not wish to see all your hard work to date wasted and the plan rejected.

I acknowledge that you and I have been discussing how the business community may be represented. I am very appreciative of this. I was pleased to hear you speak at the Millenium Rooms in January reminding the local businesses to engage with the plan, however I feel given the very short 2 min time slot allocated it was difficult for you to have meaningful engagement with the assembled business community. I am not convinced this had the desired effect.

As Rob Wing succinctly explains both Brian Chenoweth and he have had and or continue to input into the Roseland Neighbourhood Development Plan as parish councillors. They themselves cover several profiles (individual residents, business owners, parish councillors) and I understand they are on the steering group representing their parishioners' views and not necessarily or solely the representatives of the business community. I appreciate our discussions and invitation to form a business community group to feedback to the draft proposal and I believe this is happening. Unfortunately this has been slow, and difficult to organise in time for your consultation period. It may to a certain extent be due to the fact that the 6 week formal consultation for the draft plan runs from 3rd August to 14th September during which certain profiles of the community will be less likely to engage owing to family, business or other high season holiday related factors. I know it was difficult for the tourism and farming related business to meet and give feedback. I am sorry I was unable to visit your exhibition at Gerrans Memorial Hall over the bank holiday week commencing on Monday 25th August. Nevertheless the business community will continue to meet and consider the draft plan and give feedback. I believe it is a case of all parts of the community moving along together at the same speed, and alleviating any concern in the future that some parts of the community were not included in the results of the consultation. I am aware several business have responded directly to you as individuals in the absence of a collective response. It would be very appropriate if a full presentation of the draft plan were given to the business group. It would also be appropriate if the steering group would consider please an extension of time to allow for genuine and considered consultation from the business community before submitting the draft Neighbourhood Plan. For reasons of conflicting interest it would only really be appropriate for my business to pass comments on the draft plan through such a business group rather than as an individual business.

Though I still have concerns on its content and consultation process I remain in principle a supporter of the Roseland Business Plan.

Please would you confirm safe receipt of this consultation feedback.

Regards

Toby Ashworth
Proprietor
Direct Dial 01872 500 007

The logo for 'The Nare' hotel, featuring the word 'The' in a cursive script and 'Nare' in a bold, serif font.

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