

Cornwall Council Officer Comments - Crowan Draft NDP (at Regulation 14, Pre-Submission Stage – 20th July – 10th August 2018)

Affordable Housing Team

HT2 9.6 – need to live in certain settlement is too restrictive and can't be monitored and holds no weight. Only monitored with parish connection.

Community Infrastructure Levy (CIL) Officer

There is not any specific mention of CIL within the draft NDP, so the information below is general and provided for reference.

The Parish of Crowan is within CIL Charging Zone 5, and as such, housing development in the Parish will not be charged CIL. Crowan Parish Council will therefore not receive the Neighbourhood Portion of 15%, or 25% with an adopted NDP. However, Section 106 agreements will continue to be used to secure developer contributions necessary to make development acceptable.

The CIL Charging Schedule was adopted by Full Council on 10 July, and it will come into effect in Cornwall on 1 January 2019. However, CIL will only become payable on commencement of a development (not on granting of planning permission), which means that it will take a further 1½ -2 years (approximately) before CIL payments start being made to Cornwall Council.

Discussions are currently underway to determine the governance around how CIL money will be distributed, and what this will be spent on. The proposals will include an option to provide a pot of CIL money, equivalent to the Neighbourhood Portion, for Zone 5 areas. Town and Parish Councils will be consulted on this in the next few weeks. Cornwall Council's website will be kept up to date with progress around this issue – www.cornwall.gov.uk/cil.

Development Management Team

Policy HT4

The requirement for a Design and Access Statement for Householder applications in WHS areas is not supported by the National or Local validation list. Thus it would not be possible to hold an application as invalid due to the lack of a DaAS.

Does policy HT4 apply to Householder applications? Usually where an extension requires permission then the design should be in keeping with the existing dwelling so I question the need for a DaAS for HH applications. If the Parish agree then could HT4 be clarified to exclude HH applications.

Landscape Officer

The following points made by Kath Statham on 2/3/2018 are reiterated;

1. It is welcomed that the conservation and protection of the local landscape character, wildlife and historic aspects are considered in the 'Objectives' of the NDP. It will be important to carry these objectives through to strong polices, supported by clear and targeted evidence based documents.
2. The NDP area is covered by 2 Landscape Character Areas (LCA)
 - CA06 – Mounts Bay East

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- CA10 - Carmenellis

These areas are described through the 2007 Landscape Character Assessment, however the area which they each cover is extensive and the supporting text is not likely to provide a sufficient level of detail of the landscape character to support policies within the NDP. It is recommended that a local landscape appraisal is undertaken to record the elements of character which come together to make the Parish distinctly different to the rest of Cornwall. Guidance can be provided on how to prepare a local character assessment if needed.

3. Evidence gathered describing the overall character and features of value to the Parish's local distinctiveness will be beneficial to a number of policies, including the environment, design, housing and renewable energy.
4. Possibly consider Policy relating to
 - Green Infrastructure and how settlement links to the rural landscape around, and where there is significant linking tree canopy; tree protection; Cornish hedges.
 - Historic landscape – field patterns; World heritage Site (WHS)
 - Biodiversity / wildlife – how future development links to nature.
 - Village gateways and enhancement of the visual appearance and character of the settlements and their boundaries to the rural landscape.
 - Local Green Spaces, it is possible through a NDP to designate areas which are considered to have special value, to afford a greater level of protection.
 - Views/vistas – are they any significant landmarks which have an association with the wider landscape, and possibly historically link to other features.

In addition;

- a. Heritage, Landscape and Environment; policies HLE1 and HLE2 are identical.
- b. The Heritage, Landscape and Environment chapter seeks to '*preserve or improve*', perhaps stronger consideration could be given to the creation of new landscape features, particularly those referenced in the Landscape Character Assessment descriptions; for example one of the key features of

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LCA CA06 Mount's Bay East is *'well vegetated hedges with some trees on boundaries. Some hedges very high and dominant with wealth of wildflowers'*; this could be a strong hook to ensure that where feasible new development within this LCA seeks to create new landscape features in line with this description. Accordingly perhaps a statement could be added into the HLE policy that *'new development should seek opportunities to create new landscape features in line with the local landscape character'*. Also that *'Opportunity should be made wherever possible for the sustainable planting of landscape scale species to ensure the planting of 'trees for the future' '*.

- c. 9.57 It would be useful to fully reference the abbreviations SofS and BMV.
- d. Appendix I-Heritage and Landscape Maps; it may be worth checking the resolution as the detail is unclear.

WHS Team

Neighbourhood Development Plans and the Cornwall and West Devon Mining Landscape World Heritage Site

The following standard advice is being issued in relation to draft Neighbourhood Development Plans (NDP), as the World Heritage Site Office does not currently have capacity to provide bespoke submissions;

1. The World Heritage Site Management Plan (2013-2018) contains a number of policies relating to the Site and the adopted World Heritage Site Supplementary Planning Document (SPD, 2017) provides detailed information on how development impacts should be assessed before they are worked up into any application. Both of these documents are available via the Cornish Mining website using the link below;

<http://www.cornish-mining.org.uk/planning-site>

2. It would be beneficial in terms of protection of the World Heritage Site if the Neighbourhood Development Plan (NDP), currently in development, contained specific heritage and landscape policies. The Cornwall and West Devon Mining Landscape World Heritage Site (WHS) is a landscape designation that is dealt with by the UK planning system as a heritage asset of the highest importance. With this in mind it is useful to consider the impact of development in both a landscape visual/character sense as well as impacting upon specific buildings and structures. The specifics of how the WHS is to be dealt with in planning terms is set out within the WHS SPD and refers to both to national guidance (being the National Planning Policy Framework 2018) and Local Plan Policies.

The WHS Management Plan and the policies therein are material consideration in both the setting of policy and in assessing proposed development. The WHS

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Management Plan policies are therefore a useful basis for producing specific policies within an NDP. Equally the adopted WHS SPD provides expanded guidance with respect to Policy 24 of the Cornwall Local Plan Strategic Policies (2010-2030).

3. The WHS Management Plan notes that there are seven key Attributes that express the 'Outstanding Universal Value' (OUV) of the Site and these are all of equal importance but have differing degrees of protection or none at all, for example the Listed engine house or chapel within a Conservation Area (designated) versus a mineworkers' smallholding field or a mine spoil heap (non-designated). Equally it is important to consider that there will be related features/landscapes that are located beyond the boundaries of a development site that are either functionally related to the WHS or provide a landscape context that are important in terms of the setting to the WHS. Further guidance on this is again contained within the WHS SPD.

4. In addition to the above it is useful to note that the WHS differs from designations such as Areas of Outstanding Natural Beauty (AONB) in that many areas of the WHS are not aesthetically pleasing, but nonetheless are essential to the make-up of the Site overall. Equally, impacts such as noise may be an issue in an AONB, where tranquillity is part of that designation's special qualities, whereas this is not necessarily an issue within the WHS (subject to the context of the site in question).

In addition, we refer to the heritage policies set out within the emerging Hayle Neighbourhood Plan as a good example of how to apply the above general advice to deliver appropriate policy for a specific local context. We understand that the Hayle Neighbourhood Development Plan is expected to be adopted in May 2019.

Further, more detailed, guidance may be developed in future, as the World Heritage Site Partnership Board are currently considering the strategic actions for the next WHS Management Plan (2019-2024) and this has been suggested as useful.

World Heritage Site Office

August 2018