Comments below have been collated by Cornwall Council's Neighbourhood Plan Team. They include a mixture of comments to assist groups, some major and some minor (e.g. typos that are spotted along the way). These comments focus on the Part 2 of the Neighbourhood Development Plan (NDP) and do not reflect a thorough review of the supporting evidence base or Part 1 of the NDP, which doesn't present planning policies.

1.   The NDP presented as two parts is an unusual structure. It's also noted that the documents as a whole are very lengthy, running to some 88 pages (more than the main body of Cornwall's Local Plan).

        By presenting the NDP in two parts (Part One: Context and Framework) and (Part Two: Actions and Planning Policies), there is likely to be a tendency for document users to go straight to Part Two and therefore a risk that any important information in Part One is missed. Part 2 should therefore clearly signpost evidence on which the policies are based.

        The NDP refers to the 'Annex of Evidence', yet there doesn't appear to be a document of this title either presented as an annex to the document[1] or clearly signposted from the document. I've also looked at your website, and neither does a clear 'Annex of Evidence' appear here. The supporting evidence base will be valuable not just through the plan making stages but also throughout the life of the NDP. It is therefore extremely important that clear signposts to this are presented. Also that consistent document titles and references/signposts are used.

        The structure, differences and interrelationships between Part 1, Part 2 and the Annex of Evidence should be clearly set out at the beginning of *both* Part 1 and Part 2 documents (this will help document users who only look at one part).

2.   It's requested that paragraph numbers are introduced throughout your document (referencing text through these comments has been complicated by the lack of paragraph numbers). This will ease reference for all document users, both throughout the remaining NDP formation process and throughout the life of the NDP.

3.   Formatting of policy wording – the use of numbered bullet points for your policy criteria is welcome. However, this is sometimes applied inconsistently. Also the format of the policy wording could be further improved by better spacing (see suggested restructured EH1, below) which make the document more user friendly by easing legibility.

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[1] Please note that we don't encourage groups to add detailed evidence as an annex/appendix to the main NDP document. Instead, we recommend that the 'evidence base' of NDP's are presented separately on the town/parish neighbourhood plan website, with a clear signpost to this from within the text of the NDP.

4.   Your policies each have references as the titles, e.g. Policy EH1, Policy EH2. These would be improved by the addition of words in the title to indicate what each policy concerns. For example, Policy EH1: Solar Energy. This would make the document quicker to navigate for the document user.

5.   It's recommended that the NDP is reviewed to ensure the use of plain English wherever possible.

6.   It's recommended that the NDP is reviewed to ensure the consistent application of abbreviations e.g. PV is introduced in policy wording at EH1, with no previous reference.

7.   Where your NDP refers to the contents of Cornwall Local Plan it would be good practice to include a more specific reference, e.g., The Cornwall Local Plan (Policy XX), or The Cornwall Local Plan (Para. X.XX).

8.   Policy EH1 – Consider rewording and structuring as follows:

   a)   Support will be given to proposals for the installation of rooftop and large-scale photovoltaic cell arrays where the applicant can demonstrate that;
   (i)   any significant adverse impacts to the local landscape and environment are avoided and, where necessary, mitigated; and,
   (ii)   there will be no adverse effect on residential amenities through noise generation, overbearing visual impacts, or adverse impacts on highways or rights of way.

   b)   Applicants should...developments; and,

   c)   Applications for...activity.

9.   Documents referred to in your policy, which aren't part of Cornwall's Local Plan (e.g. CA21, CA22 and CA39 (Cornwall Landscape Character Study 2007)), should be made accessible from your NDP website and this should be signposted clearly in the supporting text to your policy, so that policy users can readily access these. Recommend the NDP is reviewed to ensure that this is the case in all relevant instances, where additional documents are referred to from Policy Wording.

10.   Policy EH2 – Planning policy can't dictate what consultee responses will be and so it's recommended 'consultee responses on planning applications

will be made in relation to the Appraisal and Management Plan and its delineation of character zones' is deleted.

11.   Policy EH2, consider phrasing in a way that encourages applicants to demonstrate these criteria are met. For instance 'Planning applications should demonstrate how development proposals: (a) are designed in harmony with …etc.'.

12.   Policy EH2 – phrases such as 'sufficient richness of detail' need to be better explained, what exactly does this mean? How should the document user interpret this statement? The NDP is your community's chance to set out what it wants; including phrases that are open to interpretation result in document users translating what is meant, rather than the community.

13.   Page 8, para 2 (please see comment 2) – you say that 'more than this number of new dwellings are likely to be needed' with a confusing reference to the Annex of Evidence (see comment at the beginning regarding this). CC advice is that NDPs set out a clear 'Housing Statement', which Examiners also like to see. This should clearly state the number of houses the NDP seeks to accommodate and the approach the NDP adopts to do this. Page 8, para 2 falls short of stating the number of houses that the NDP seeks to accommodate and this should be clarified. It's also recommended that relevant content Page 11 is restructured, so that a clearer 'Housing Statement' is presented in the document.

14.   Page 9, bottom para – it's recommended that you refer to paras 76 and 77 of the NPPF and consider whether it would be better to use terminology consistent with this i.e. 'Local Green Space' instead of 'Green Space'.

15.   Page 9, bottom para – the split structure of this document with regards to the policy relating to designating Local Green Spaces and this narrative could be improved. Consider adding a specific policy reference and page reference so that it is clear where the document user is being directed.

16.   Policy HH1 – an accompanying map clearly illustrating the relevant location with a buffer zone illustrating the 7 metres should accompany this policy wording.

17.   Page 10, last paragraph – delete 'For convenience..' (your NDP *must* show this Development Boundary (DB) if it is subject to a NDP policy).

18.   Figure 2.1 – the DB is crucial to your NDP and, as such, its advised that this figure is presented at least on one side of A4. The map has to be clearly legible for the document user, so that they can see at the finer detail what land is within and outside of the DB.

19.   Page 11, para 1 – this is slightly confusing as the sum of the table does not add up to the 132-228 stated?

20.   Table ?, Page 11 – it's strange to refer to site options by cell numbers alone. The information identifying these sites exists as part of your suite of documents and so it would make sense, if they are referred to, that they are identified in this main area of the NDP (both with a name and on a map). Minor point is that a Table reference should be added.

21.   Page 10, first para – refers to part one noting that 'developments of open market dwellings must meet…'; please be aware that any requirements that aren't presented as policy wording will not be enforceable. It would be worth checking that no aspects raised on Part 1 are unintentionally missed from your policy wording.

22.   Policy HH2 – refers to the 'cumulative housing requirement' – this provides insufficient information, what is this figure? Your policy should set this out as an approximate figure.

23.   Policy HH2 – 'Development that exceeds this figure' – linked to above, what figure?

24.   Policy HH2 – Structure of the policy numbering could be improved:

        The Development Boundary of Lostwithiel is set out in Figure 2.1.

        a) Development will be supported that helps to deliver approximately XX dwellings by 2030;

        b) Development that exceeds XX dwellings will be supported….

   **c) Proposals for development….etc.**

25.   Policy HH2 (d) - what is the 'defined settlement area'? The use of word 'avoid', is this strong enough? Appraisal and Management Plan, should be signposted from the supporting text for this policy. The Appraisal and Management Plan doesn't seem to be available to refer to at this stage. It should be noted that, anything which contributes to the interpretation of a NDP policy must be made available no later than at the time the NDP is submitted.

26.   Policy HH2 (e) – it's welcome to see that comments from the fire service have been included. Can you just ensure a link to the HAPPI principles is included.

27.   Page 12, bottom para – typo, <u>P</u>olicy. Also, 'Paragraph 55.'

28.   Policy HH3:

(i) 'lead to an enhancement to the immediate setting' is stated in NPPF Para 55 and so, as it repeats this, should be deleted.

(ii) Typo, semi-colon missing at end.

(vii), (viii) & (ix) are covered by existing procedures so should be deleted.

29.   Page 13, para 1 – it would be good to format the issues that the Design and Access Statement must address in a list (more user friendly).

30.   Page 13, para 1 – 'The Town Council will urge', shouldn't this read 'Policy HH4 of the NDP will ensure that..'.

31.   Policy HH4 – its recommended that the policy wording for Policy HH4 is reviewed in light of the following comments.

32.   Policy HH4 – there is overlap here with Policy EH2. Consider merging the two policies. Also, reference to the use of traditional materials arises in a couple of policies (e.g. EH2 and HH3), if you are covering this in a policy that applied to all new development (i.e. Policy HH4, there shouldn't be any need to repeat this requirement in other policies and so it's recommended that this area is reviewed).

33.   Policy HH4 - some of the wording and requirements of Policy HH4 is questionable, for instance:

(iii) 'the Design and Access Statement must address the following: connection with the countryside' – what does this mean, visual connection, highway connection? Whatever connection this refers to, will it be a realistic requirement for all developments?

(iv) 'the Design and Access Statement must address the following: quality for pedestrians, cyclists and the physically disadvantaged' – again, what does this specifically mean – quality routes? quality infrastructure? Quality storage facilities? How will 'quality' be defined and judged?

(viii) 'the Design and Access Statement must address the following: occupier controlled access to fibre, copper and other home office services' – this is likely to be out of the control of the developer;

(ix) 'the Design and Access Statement must address the following: environmental footprint' – it isn't clear enough what this means and how are applicants expected to interpret this requirement and meet it?

(x) 'the Design and Access Statement must address the following: play provision' – this isn't going to be appropriate for all applications.

34. Policy HH4 – the policy wording is very lengthy and I wonder if the majority of outcomes could be obtained through a more succinct approach. The following has recently been drafted by another group I'm working with and could be considered for your NDP:

   1) All proposals for new development must be sited and designed so as to recognise, support and enhance the distinctive character of Lostwithiel, particularly within the AONB (see Figure X).

   2) Applicants should provide evidence of the assessment and a clear understanding of the local landscape, built and natural environments and wildlife habitats in order to demonstrate that the proposed development:
      i.   will not detract from their significance and character, and,
      ii. will be visually well-integrated with nearby structures in terms of form, scale, building details, local features, materials, finishes and colour, siting, landscaping and characteristic patterns of settlement, reflecting the Cornwall Design Guide.

   3) As part of the evidence of compliance with this policy, planning applications should include a clear visual representation of the final form of the proposed building(s) in the context of their immediate neighbourhood.

35. Policy HH4 - I think reference to 'Developments will be expected to incorporate existing mature trees ….*and provide landscaping and sufficient spacing, appropriate to the rural character of the area'* can be omitted as this aspect would be picked up under existing (a)(i) or the example given in the previous comment. Also, as this policy applied to all development, it does not necessarily fit well with proposals that will come forward within the town development boundary, which isn't necessarily a 'rural character'.

36.   Policy HH4 (e) – 'The Lostwithiel Neighbourhood Plan design policy requires all applicants to demonstrate how their design process responds to the character statements in the NDP, as well as local and national strategic policy.' - Doesn't the required Design and Access Statement seek to do this already e.g. this partially repeats previous requirement in (b). Also, where is the concise list of 'character statements in the NDP' that this policy refers to (this should be signposted)?

37.   Policy HH4 – 'The Town Council may request a design review in order to demonstrate how the proposal reflects RIBA or CABE design review guidelines.' – policies should be definitive ad so it would be better to set out the parameters where this would be required.

38.   Page 14, bottom paragraph – signpost to where document user can gain understanding of 'Character Zone 6' should be added.

39.   Policy HH6 – it's recommended that Figure 1.6 is repeated in Part 2 of your plan. Part 2 is the section that deals with the planning policies and to include it alongside Policy HH6 would simplify matters for document users.

40.   Page 16 – reference to character zones (see previous comments).

41.   Policy BE2 – It's recommended that you review the draft policy BE2 in light of the content of Local Plan Policy 4 where there's an opportunity for your NDP to interpret Policy 4 at Lostwithiel's local level; this is usually done by means of a map and related policy wording clearly setting out the 'town centre', the 'primary retail frontages' and the 'primary shopping area' of your town. An example of such policy wording is *Policy 4 of Cornwall's Local Plan considers shopping, services and community facilities. In applying this policy to Lostwithiel, the defined town centre, primary shopping area and primary retail frontages are identified on Map XX"* (then present an equivalent map to that prepared for Launceston(ignoring the labels for Madford House and Sprys Garage/Angel Hill), as shown in the example below).
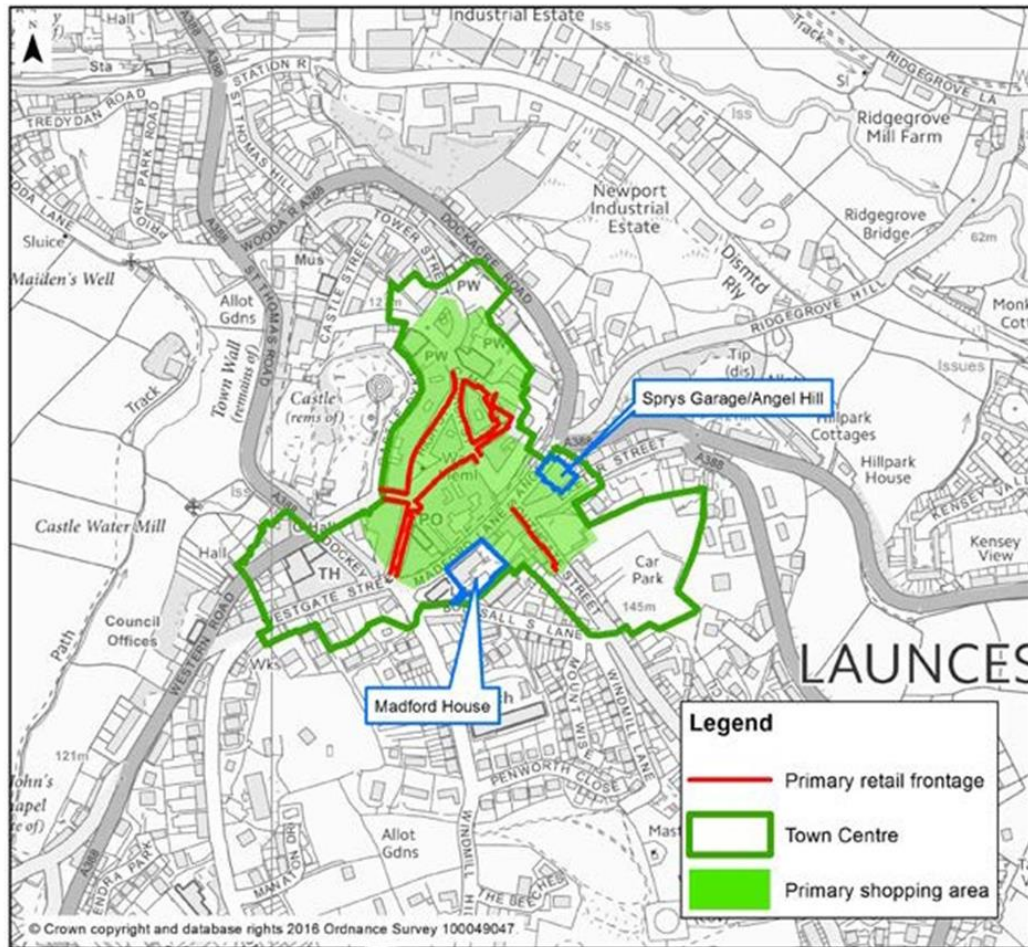
42.   Policy BE2 – (i) & (ii) should be removed as this isn't considered to be in general conformity with Local Plan Policy 5., where proposals that would result in a loss of business space can be considered acceptable where it can be demonstrated that there is no market demand, through active marketing for at least a period of 9 months, and there is no requirement for premises to be vacant/not in active use for any length of time.

43.   Policy BE2 (iii) - 'Apart from changes allowed under permitted development rights, proposals to convert present business or commercial properties into residential properties will be resisted; and applications for a change of use to an activity that does not provide employment or trading opportunities will only be permitted if it can be demonstrated that..being sympathetic to the area in which they are proposed' doesn't make sense? Be careful not to repeat requirements covered off by other policies.

44.   Policy BE2 (iv) – similar to (iii) the English doesn't flow. It's not clear that this is this adding anything to existing policies and procedures?

45.   Policy BE3 – whilst this is acceptable it should be noted that not all home-based enterprises will be subject to planning applications.

46.   Policy CR1 – the planning procedures exist that ensure appropriate education contributions and therefore this policy should be removed.

47.   Policy CR2 – this should be reworded to reflect that it relates only to the local element of the CIL. Also abbreviation of CIL needs introducing at first instance where Community Infrastructure Levy is stated in the document. Also note, it's unlikely that such a policy will influence a planning decision as the local element of the CIL will be allocated as a matter of course.

48.   Policy CR3 – this should be deleted as it's not a planning policy.

49.   Policy CR4 – consider 'public open space' instead of 'common green space' (public open space is the usual terminology used). Recommend that the old Mill Pond as specifically defined as 'Local Green Space' to.

50.   Policy CR4, Figures 2.7 & 2.8 – it's important to refer to these sites as 'Local Green Space' not 'open green space', in order to link back to Paragraphs 76 and 77 of the National Planning Policy Framework.

51.   Figure 2.7 – Review the figure so that labels 1-5 are applied to each of the inset maps as relevant.