

## Neighbourhood Development Team Comments from the informal review of the St Hilary NDP SEA/HRA draft Plan and St Hilary NDP Steering Group responses and revisions to policy text

### St Hilary Policy Matrix

#### Overview

The plan is comprehensive and well-evidenced. Comments on individual policies are set out below but there are some general comments as well.

1. We advise against repetition of Cornwall or national policy in neighbourhood plans - NDPs are required to be in general conformity with local and national policy and those policies will apply without having to restate them. Where a policy simply restates local or national policy, we have advised removal.
2. Some text should be in supporting text rather than policy – this is highlighted in orange. Suggested alternative text is in red and text to be deleted is struck through.
3. The Climate Emergency DPD (CEDPD) is in its final stages and we expect that it will soon be approved for use. The policies in the DPD will apply across Cornwall and may mean that several of your policies are not required. You can access the draft DPD here [Climate Emergency Development Plan Document \(DPD\) - Cornwall Council](#)
4. Policies should be positively worded 'Proposals will be supported where...'
5. There are several policies around heritage and landscape which simply restate local or national policy – these are unnecessary as local and national policy will continue to apply and can be removed.
6. You don't need to cross refer to other policies – proposals need to meet all relevant policy requirements.

### Steering Group Responses to the comments received from the Neighbourhood Development Team

The NDP Steering Group reviewed and discussed all the comments provided by the Neighbourhood Development Team and responded with necessary and appropriate revisions to policies at five working group sessions held between 10<sup>th</sup> February and 22<sup>nd</sup> March 2023. The [Steering Group's response](#) to the comments provided by Cornwall Council are shown below in the right hand column of the Policy Matrix together with the revised policy text.

Ref	Policy name	Policy Text	Comments	Steering Group response and revised policy text
1a	Trees and Woodland	<p>Development proposals should demonstrate, via a comprehensive landscaping plan, the inclusion, wherever possible, of native trees and Cornish hedges planted with native trees species, in any new development.</p> <p><del>Any tree lost through new development will be replaced in a way which achieves net gain of trees. Adjusting for the time lag in achieving maturity, trees will be replaced on a three to one ratio.</del></p> <p>Proposals should be able to show that they do not result in the loss of irreplaceable ancient woodland or veteran trees.</p>	<p>I think the canopy policy in the climate emergency DPD covers the second part of the policy.</p>	<p>Policy 1a Trees and Woodland Development proposals should demonstrate, via a comprehensive landscaping plan, the inclusion, wherever possible, of native trees and Cornish hedges planted with native tree species, in any new development. Proposals should be able to show that they do not result in the loss of irreplaceable ancient woodland or veteran trees.</p> <p><i>Revised in line with CC comments</i></p>
1b	Biodiversity and GI	<p><b>Proposals for development will be supported where:</b></p> <p>A. <del>Proposals must</del> <b>they can</b> demonstrate how their scheme has responded to the guidance contained within Cornwall Council's Biodiversity Supplementary Planning Document. <b>Major developments should include</b> a thorough survey of the existing biodiversity, carried out by a suitably qualified ecologist.</p> <p>C. Proposals should enhance the biodiversity and green infrastructure of the Parish through retaining and enhancing wildlife areas and green spaces and the connections between them. Development proposals should demonstrate that they:</p>	<p>There is a policy in the CEDPD which covers BNG and may make part A of this policy unnecessary.</p> <p>B: you cannot require this for all proposals – provision merged with A.</p>	<p>Policy 1b Biodiversity and Green Infrastructure Proposals for development will be supported where:</p> <p>A. They can demonstrate how their scheme has responded to the guidance contained within Cornwall Council's Biodiversity Supplementary Planning Document.</p> <p>B. Major developments include a survey of the existing biodiversity, carried out by a suitably qualified ecologist.</p> <p>C. Proposals enhance the biodiversity and green infrastructure of the parish through retaining and enhancing wildlife areas and green spaces and the connections between them so that they:</p> <ol style="list-style-type: none"> <li>i. avoid areas which contain large or linked areas of natural and/or semi- natural habitat</li> </ol>

		<p>i. avoid areas which contain large or linked areas of natural and/or semi-natural habitat</p> <p>ii. ensure that any areas of natural and/or semi-natural habitat are retained and ideally linked together as part of the proposals</p> <p>iii. retain, restore and re-create habitat linkages such as Cornish hedges and ancient field systems as part of developments</p> <p>iv. maximise enhancement opportunities to create, expand and link natural and/or semi-natural habitats on-site</p> <p>v. conserve, protect and enhance features of biological interest across the parish including locally designated County Wildlife Sites. Where any unavoidable ecological impacts occur they must be appropriately mitigated or compensated for</p>		<p>ii. ensure that any areas of natural and/or semi-natural habitat are retained and ideally linked together as part of the proposals</p> <p>iii. retain, restore and re-create habitat linkages such as Cornish hedges and ancient field systems as part of developments</p> <p>iv. maximise enhancement opportunities to create, expand and link natural and/or semi-natural habitats on-site</p> <p>v. conserve, protect and enhance features of biological interest across the parish including locally designated County Wildlife Sites. Where any unavoidable ecological impacts occur they must be appropriately mitigated or compensated for</p> <p><i>Revised in line with CC comments</i></p>
1c	Local Green Space	<p>The following open spaces are designated as Local Green Spaces in accordance with paragraphs 101-102 of the National Planning Policy Framework of July 2021:</p> <ul style="list-style-type: none"> <li>• Rosudgeon Recreation Ground;</li> <li>• Friendship Woods;</li> <li>• Memorial Gardens in St Hilary;</li> <li>• Badcock Green in Relubbus;</li> </ul> <p>and delineated on Map 1c.</p> <p>Development will not be permitted within these designated spaces or on land immediately next to them if it would harm the openness or special character of the Local Green Space or its significance and value to the local community.</p>	<p>If you are allocating local green spaces, please ensure that the relevant landowners have been consulted on the proposal to allocate their land as LGS, and that there is a clear justification for the inclusion of the land.</p> <p>There is standard text for LGS policies that is accepted by Examiners (below) and we suggest that you use that.</p> <p><b>The neighbourhood plan designates the following locations as local green</b></p>	<p>Policy 1c Local Green Space</p> <p>The neighbourhood plan designates the following locations as local green spaces:</p> <ol style="list-style-type: none"> <li>i. Rosudgeon Recreation Ground</li> <li>ii. Friendship Woods</li> <li>iii. Memorial Garden in St Hilary</li> <li>iv. Badcock's Green in Relubbus</li> </ol> <p>These are shown on Map 1c Proposed Local Green Spaces.</p> <p>Inappropriate development will only be approved in very special circumstances.</p> <p><i>Revised in line with CC comments</i></p>

			spaces (as shown on the proposals map). [List proposed LGS] Inappropriate development will only be approved in very special circumstances.	
2a	Landscape Character	<p><b>Development proposals will be supported where they</b></p> <p>A. All proposals for development in the parish <del>must</del> demonstrate how they will protect and positively enhance the landscape character of St Hilary parish with reference to the St Hilary LLCA <del>of the area by detailing how the proposals have taken account of the relevant components of the of the St Hilary LLCA description.</del></p> <p>B. Proposals for any development must demonstrate that if external lighting is required it protects the night sky as far as possible and conforms to the ban on neon lighting in the World Heritage Site.</p> <p>C. <b>Owing to the topography and historic industrial development of the area there are important views and vistas that contribute to the special character and quality of the countryside and coast and need to be preserved. <u>In particular, development should</u></b> <b>New development should</b> not compromise the vistas and views shown on Map 2a and described in Appendix 2.</p>	Move orange text to supporting text.	<p>Policy 2 Landscape Character</p> <p>A. Development proposals will be supported where they demonstrate how they will protect and positively enhance the landscape character of St Hilary Parish, including the areas covered by the AONB and Area 3 of the WHS with reference to Policy 23 of the CLP and the six landscape types identified in the St Hilary LLCA.</p> <p>B. Proposals for any development must demonstrate that if external lighting is required it protects the night sky as far as possible and conforms to the ban on neon lighting in the World Heritage Site.</p> <p>C. New development should not compromise the views and vistas as shown on Map 2a and described in Appendix 2.</p> <p><i>Revised in line with CC comments with addition of reference to AONB in light of deletion of Policy 2b and renamed as Policy 2.</i></p>

2b	The Cornwall AONB and Undeveloped Coast	<p>A. All proposals for development in, or within the setting of, the Cornwall Area of Outstanding Natural Beauty will be required to conserve or enhance the landscape character and the scenic and natural beauty of the AONB. Development proposals should demonstrate how they have responded to and met policies within the National and Cornwall AONB Management Plan and accord with the supporting policy framework set out in the St Hilary NDP.</p> <p>B. All development within, or in the setting of, the AONB will also be required to show within the design and access statement, how it has taken account of the Cornwall AONB Management Plan 2022-2027, specifically the 'Managing Development' Section of 'Policy' and Section 8 'South Coast Western' of 'Local' and subsequent reviews of the plan during the life of the NDP.</p> <p>C. Development proposals in the undeveloped coast of the Parish around Prussia Cove will not be supported where they do not comply with the policy framework set out within this NDP.</p>	<p>The AONB is already protected under policy 24 and parts A and B are unnecessary. Not all development is required to produce a design and access statement.</p> <p>For part C, its not clear what the intention is? If it is simply to comply with the policies in the NDP, then you don't need to say that. If there is specific development that is supported in Prussia Cove, you may need a specific policy to set that out.</p>	<p><i>Deleted in line with CC comments. Reference to AONB added to the revised Policy 2.</i></p>
3a	Historic Character	<p>Development proposals that affect heritage assets will be supported where they</p> <p>a) have assessed the historic significance of the proposed site and its setting to assess the impact of any development on historic character with reference to the Cornwall Distinctiveness Study</p>	<p>Much of this policy is covered in Policy 24 of the CLP and is unnecessary.</p> <p>iii) repeats the requirements in policy 2a and is unnecessary</p>	<p>Policy 3a Historic Character, Heritage Assets and Conservation Areas</p> <p>Development proposals that affect heritage assets will only be supported where they:</p> <p>A. Have assessed the historic significance of the proposed site and its setting to identify the impact of any development on historic character or heritage assets with reference to: relevant</p>

		<p style="text-align: center;"><b>(2019) and the Cornwall Council Heritage Strategy (2022).</b></p> <p>Ensure that development proposals include an appropriate investigation into the historic significance of the proposed development site and its setting and adequately assess the impact of the development on historic character.</p> <p><b>The design seeks to conserve and enhance any historic character by</b> Development proposals must show how they have included elements within the design, siting, layout and form that demonstrate that they have considered historic character and sought to conserve and enhance character by:</p> <ul style="list-style-type: none"> <li>i. Conserving and enhancing elements of historic character within the design e.g., historic field pattern.</li> <li>ii. Undertaking repair and conservation work to a heritage asset to restore character <b>where appropriate.</b></li> <li>iii. Demonstrating how they have considered the St Hilary Local Landscape Character Assessment and the Cornwall 1994 Historic Landscape Character Assessment in developing proposals.</li> <li>iv. Following the 4 steps outlined in the Cornwall Distinctiveness Study, published in 2019 by Cornwall Council, in making an assessment.</li> <li>v. Demonstrating how they have complied with the Cornwall Council Heritage Strategy adopted in May 2022</li> </ul>		<p>Local Plan Policies; national legislation and guidance (currently NPPF 2023); the Ancient Monuments and Areas Act; the Planning (Listed Buildings and Conservation Areas) Act; the Cornish Cultural Distinctiveness Assessment Framework (2019); the Framework Convention for the Protection of National Minorities; the Cornwall Council Heritage Strategy (2022). Proposals affecting farmsteads should make reference to the Cornwall Historic Farmsteads Guidance</p> <p>B. Act to preserve, conserve and enhance historic character and any designated or non-designated asset (including conservation areas and locally listed assets)</p> <p>C. Seek to conserve and enhance any historic character by undertaking repair and conservation work to a heritage asset where appropriate</p> <p><i>Revised in light of CC comments regarding Policies 3a, 3b, 3c and 3e.</i></p> <p><i>Policy 3a revised to amalgamate essential references to local and national plan policies covering Historic Character, Heritage Assets, Conservation Areas and Protection of National Minorities.</i></p>
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3b	Heritage Assets	<p><del>A. Ensure that all designated and non-designated heritage assets within new development sites are adequately identified and assessed by developers as part of their application, in accordance with requirements set out within the NPPF.</del></p> <p><del>B. Development proposals that cannot demonstrate the protection, preservation, access and enhancement of designated and non-designated heritage assets of archaeological, architectural and historic significance in the NDP area including their settings will not be supported unless it can be demonstrated that the public benefit arising from such development outweighs any identified harm</del></p> <p><del>C. Development proposals must demonstrate how they can make appropriate repair and conservation works to any listed building or structure which forms part of a planning proposal.</del></p>	<p>This policy repeats provisions of the NPPF and policy 24 and is unnecessary.</p>	<p><i>Deleted in light of CC comments. References to relevant local and national plan policies included into a revised Policy 3a</i></p>
3c	Conservation Areas	<p><del>Development proposals within or visually and otherwise affecting the setting of the Conservation Areas must pay special regard to preserving and/or enhancing their character or appearance and adhere to Policy 7a. Special regard must also be paid to the setting of the Conservation Area and to respecting the conditions laid out in the conservation area character assessment. Any future Conservation Area Appraisals or Conservation Area Management Plans should be respected.</del></p>	<p>Conservation areas are protected under local and national policy and this policy could be removed.</p> <p>Policy 7a is around design but does not specifically mention conservation areas?</p>	<p><i>Deleted in light of CC comments. References to relevant local and national plan policies included into a revised Policy 3a</i></p>

3d	Cornwall and W. Devon Mining WHS	<p><del>A. All development proposals within, or in the setting of the Tregonning and Gwinear Mining Districts with Trewavas of Area Three of the Cornwall and West Devon Mining World Heritage Site will be required to accord with the policies contained within the World Heritage Site Management Plan and guidance set out within the WHS Supplementary Planning Document.</del></p> <p><del>B. Proposals should demonstrate how they have taken account of the supporting evidence base within the WHS Supplementary Planning Document in establishing the effects of proposals on the Outstanding Universal Value of the World Heritage Site designation.</del></p> <p><del>C. Proposals that would result in an adverse effect on any attribute of the WHS that contributes to OUV, or its setting, and which do not preserve the distinctive historic character of the area will not be supported.</del></p>	The WHS is protected in local and national policy and so this policy is unnecessary.	<p>Policy 3b The Cornwall and West Devon Mining World Heritage Site</p> <p>A. All development proposals within, or in the setting of, the Tregonning and Gwinear Mining Districts with Trewavas of Area Three of the Cornwall and West Devon Mining World Heritage Site will be required to accord with the national and local heritage policies, including policies contained within the World Heritage Site Management Plan and guidance set out within the WHS Supplementary Planning Document.</p> <p>B. Little or no weight will be given to attempts to demonstrate that a development is not located within a smallholding solely on the basis of the tithe award/map and 1841 census, when other characteristics, including but not limited to size, location and association, exist.</p> <p>C. Development will not be supported in fields that are characteristic of smallholdings, which have seen the loss of one or more field boundaries as part of later amalgamation, where these fields continue to provide an appreciable contribution to the setting of mining fieldscapes or settlements.</p> <p><i>Revised in light of CC comments but retained as a Policy as the Steering Group are of the strong opinion that reference to miners smallholdings adds to the WHS policies and that this is important given the contribution they make to the setting of the parish's fieldscapes and settlements. Renumbered as Policy 3b</i></p>
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3e	Cornish National Minority	Proposals and decisions should align with the needs of the Framework Convention for the Protection of National Minorities.	From a planning perspective, it is not clear what this policy is seeking to achieve? All NDPs need to meet the basic conditions, one of which is ensuring that the plan meets equalities legislation – It would probably be better to include this in an equalities statement in the basic conditions statement. We are currently producing a template for this.	<i>Deleted in light of CC comments. References to relevant local and national plan policies included into a revised Policy 3a</i>
4a	Renewable Energy	Small scale domestic renewable energy such as solar panels and ground source heat pumps will be supported a) within the development boundaries of existing settlements. b) In hamlets and in the open countryside where <del>Outside settlements and within agricultural holdings, where</del> it can be demonstrated that proposals are of low visual and landscape impact <del>and not in conflict with other policies within this plan.</del>	Minor changes suggested  See also comments from the Flood Officer which are attached to the email.	Policy 4a Renewable Energy Small scale domestic renewable energy such as solar panels and heat pumps will be supported where it can be demonstrated that proposals are of low visual, heritage and landscape impact.  <i>Revised in light of CC comments</i>
4b	Energy Efficiency	A. The design and standard of any new development should aim to meet a high level of sustainable design and construction and be optimised for energy efficiency, targeting zero	Policy SEC1 of the CEDPD covers much of this content and you should review that policy and see whether that	Policy 4b Energy Efficiency A. The design and standard of any new development should aim to meet a high level of sustainable design and construction and be

		<p>carbon emissions. Alterations to existing buildings requiring planning permission must be designed with energy reduction in mind and comply with sustainable design and construction standards.</p> <p>Development proposals should demonstrate that they have considered:</p> <ul style="list-style-type: none"> <li>i. Siting and orientation to optimise passive solar gain where this can be shown to be of low landscape and visual impact</li> <li>ii. The use of high quality, thermally efficient building materials</li> <li>iii. Installation of energy efficiency measures such as loft and wall insulation and double glazing</li> </ul> <p>B. Non-residential developments should aim to meet the Buildings Research Establishment BREEAM building standard 'excellent'.</p> <p>C. The retrofitting of heritage properties/assets including listed buildings and those in conservation areas and the WHS would be supported to reduce energy demand and to generate renewable energy where appropriate, providing it safeguards historic and architectural special interest and development is achieved with the full engagement and permissions of relevant organisations.</p>	<p>addresses the concerns raised in this policy and (if the CEDPD is accepted in its current form) remove the elements where policy is duplicated.</p>	<p>optimised for energy efficiency, targeting zero carbon emissions. Alterations to existing buildings requiring planning permission must be designed with energy reduction in mind and comply with sustainable design and construction standards.</p> <p>Development proposals should demonstrate that they have considered:</p> <ul style="list-style-type: none"> <li>i. Siting and orientation to optimise passive solar gain where this can be shown to be of low landscape, heritage and visual impact</li> <li>ii. The use of high quality, thermally efficient building materials</li> <li>iii. Installation of energy efficiency measures such as loft and wall insulation and double glazing</li> </ul> <p>B. Non-residential developments should aim to meet the Buildings Research Establishment BREEAM building standard 'excellent'.</p> <p>C. The retrofitting of heritage properties/assets including listed buildings and those in conservation areas and the WHS would be supported to reduce energy demand and to generate renewable energy where appropriate, providing it safeguards historic and architectural special interest and development is achieved with the full engagement and permissions of relevant organisations.</p> <p><i>Retained until CEDPD is adopted. To be reviewed after CEDPD is finalised &amp; adopted</i></p>
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4c	Natural resources and climate resilience	<p>A. Proposals should make use of Sustainable Urban Drainage principles and be able to demonstrate the following:</p> <ul style="list-style-type: none"> <li>i. How they will reduce as far as possible the use of hard, engineered drainage systems</li> <li>ii. How they intend to manage water at or near the surface and maximise infiltration into the ground, and</li> <li>iii. How they will use drainage solutions to deliver ecological and community benefits</li> <li>iv. How they have maximised the use of “natural” SuDS features including infiltration, swales, storage basins, ponds and wetlands</li> <li>v. How they have considered water efficiency, for example by incorporating rainwater harvesting technology alongside other SuDS features</li> <li>vi. How they have considered tree planting, street trees, rain gardens and green roofs</li> </ul> <p>B. Development proposals must include a drainage strategy to show how they have included adequate drainage that can cope with a 1 in 100-year flooding event. <del>A Flood Risk Assessment (FRA) is required for development sites which are located in flood zones 3a and 3b or any other area of known flood risk and/or drainage issues</del></p> <p>C. Any proposed new development adjacent to the coast should demonstrate consistency with the Cornwall &amp; Isles of Scilly Shoreline Management Plan (SMP2, 2011, the review of 2016 and any further updates)</p>	<p>See comprehensive response from the flood officer attached to the email.</p> <p>We would advise against a policy designating a CCMA for the coastal area at this time; the SMP recognises the need to protect some heritage assets along this stretch of coastline including some listed buildings. However, the “assessment of flood risk and erosion risk has not identified these features along the hard cliffs as immediately at risk during the period through to 2105.” – so largely beyond the 100 year period that is used for criteria is determining whether a ccma is needed.</p> <p><b>Text from the Shoreline Management Plan 2 regarding the stretch of coastline along the St Hilary NDP area.</b></p> <p>this management area are highly valued for their geology and maritime habitats. There are also</p>	<p>Policy 4c Natural Capital and Climate Resilience</p> <p>A. Proposals should make use of Sustainable Urban Drainage principles and be able to demonstrate the following:</p> <ul style="list-style-type: none"> <li>i. How they will reduce as far as possible the use of hard, engineered drainage systems</li> <li>ii. How they intend to manage water at or near the surface and maximise infiltration into the ground, and</li> <li>iii. How they will use drainage solutions to deliver ecological and community benefits</li> <li>iv. How they have maximised the use of “natural” SuDS features including infiltration, swales, storage basins, ponds and wetlands</li> <li>v. How they have considered water efficiency, for example by incorporating rainwater harvesting technology alongside other SuDS features</li> <li>vi. How they have considered tree planting, street trees, rain gardens and green roofs</li> </ul> <p>B. Development proposals must include a drainage strategy to show how they have included adequate drainage that can cope with a 1 in 100-year flooding event.</p> <p>C. Any proposed new development adjacent to the coast should demonstrate consistency with the Cornwall &amp; Isles of Scilly Shoreline Management Plan (SMP2, 2011, the review of 2016 and any further updates). Proposals to undertake minor works to improve sea defences and strengthen or stabilise cliff faces will be supported where it can be demonstrated that the works are consistent</p>
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			<p>is envisaged that the non-interventional policy approach continues to include the funding of a strategic coastal monitoring programme, in order to inform future SMP reviews and local strategies and studies, including surveillance of the condition of the World Heritage site. Under a NAI scenario there is likely to be some re-routing of the current SW Coast Path, but this should be relatively straightforward as realignment of the path is not constrained at any point by development</p>	
5a	Settlement Boundaries	<p>This plan establishes new boundaries for the coherent settlements within the <b>Neighbourhood Plan Area</b> and where the settlement edge of villages that have their core in adjacent parishes has extended into the Parish.</p> <p>Settlement boundaries have been defined for the following seven areas of settlement (see Maps):</p> <p>5a.1 St Hilary  5a.2 St Hilary Churchtown  5a.3 Relubbus (part within St Hilary Parish boundary)  5a.4 Plain-an- Gwarry</p>	<p>General – the maps are of poor quality and higher resolution images should be used.</p> <p>St Hilary – the boundary has been drawn very tightly to the existing built up area, leaving no room for infill or rounding off – we would normally advise that you consider leaving some space for rounding off or infill. Your map also does not seem to</p>	<p>Policy 5a Settlement Boundaries</p> <p>This plan establishes new boundaries for the coherent settlements within the Neighbourhood Plan Area and where the settlement edge of villages that have their core in adjacent parishes has extended into the Parish.</p> <p>Settlement boundaries have been defined for the following seven areas of settlement (see Maps):</p> <p>5a.1 St Hilary  5a.2 St Hilary Churchtown  5a.3 Relubbus (part within St Hilary Parish boundary)  5a.4 Plain-an- Gwarry</p>

		<p>5a.5 Rosudgeon (part within St Hilary Parish boundary)  5a.6 Gwallon (part within St Hilary Parish boundary)  5a.7 Gears Lane (part within the Designated Area for the St Hilary NDP)  <b>Small scale infill and rounding off</b> Infill development and redevelopment of sites within the settlement boundaries of small developments of one or two dwellings will be supported. where proposals conform with the rest of the relevant policies within this plan. Development outside the settlement boundaries will support be defined as either a Rural Exception Site (see Policy CLP Policy 9 and St Hilary NDP Policy 5b) or as Housing in the Countryside subject to CLP Policy 7 and NDP Policy 5d.</p>	<p>include one dwelling that is on our more recent mapping (see map 1 at the end of this doc.)</p> <p>St Hilary Churchtown – fine  Relubbus – fine  Plain an Gwarry – fine  Rosudgeon – fine  Gwallon – fine  Gears Lane – following the boundary review, this area is now just outside of the parish boundary and forms part of Perranuthnoe parish; however, we would suggest that the NDP boundary is maintained according to the old parish boundary (as in the designated plan area) and the St Hilary NDP policies apply to this area. I have amended the policy wording so that it refers to the NDP are rather than the parish.</p> <p>Move policy text re development outside settlement boundary to policy 5d</p>	<p>5a.5 Rosudgeon (part within St Hilary Parish boundary)  5a.6 Gwallon (part within St Hilary Parish boundary)  5a.7 Gears Lane (part within the Designated Area for the St Hilary NDP)</p> <p>Small scale infill and rounding off within the settlement boundaries will be supported.</p> <p><i>Revised in light of CC comments. Policy 5a.1 St Hilary map on page 50 and Figure 31 in Appendix 1 updated with addition of the building circled on the map on the last page of the CC comments although the Steering Group have not been able to find evidence that it is a dwelling. It was not on the list of properties CC provided in April 2023 or is it listed as an address with a post code. Two newly constructed dwellings that are not yet shown on CC most recent mapping have also been added to Policy 5a.1 St Hilary map.</i></p>
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5b	Affordable Housing	<p>Proposals for affordable housing development <del>in areas outside</del> The provision of affordable homes on exception sites in accordance with Policy 9 of the Cornwall Local Plan will be supported where: <del>is supported. Any such development should be proportionate to the size of the settlement that it relates to and conform to the other relevant policies within this plan. Housing on rural exception sites within the parish must:</del></p> <ul style="list-style-type: none"> <li>i. <del>Be</del> <b>they are</b> closely related, <del>or</del> and immediately adjacent to a settlement; and</li> <li>ii. They are , at a scale and design which is in keeping with the settlement and contributes to preserving and enhancing the rural identity of the parish; and</li> <li>iii. <del>Be of a scale, size, design,</del> the type and tenure <del>that</del> meets the identified needs of local people in housing need <del>and conforms with other policies within this plan;</del> and</li> <li>iv. They are available <del>only</del> <b>firstly</b> to people with an identified local connection to the parish in line with Cornwall Council policy; and <del>definition</del></li> <li>v. Be <b>secured</b> <del>as</del> affordable housing in perpetuity; and</li> <li>v. <del>Be based on a target level of affordable homes of 100%</del></li> <li>vi. <del>Be built to net zero carbon emissions standards including provision of renewable</del></li> </ul>	<p>Repeats i)</p> <p>iii) you can't restrict the homes only to people with a local connection – they will be offered first to people meeting the local connection criteria but if there were no takers, would then cascade out to adjacent parishes.</p> <p>vi) is covered in your renewable policy (or in the CEDPD)</p> <p>Much of this policy simply repeats the provisions of policy 9 and is unnecessary.</p>	<p>Policy 5b Affordable Housing</p> <p>Proposals for affordable housing development on exception sites in accordance with Policy 9 of the Cornwall Local Plan will be supported where:</p> <ul style="list-style-type: none"> <li>i. They are closely related or immediately adjacent to a settlement area and</li> <li>ii. They are of a scale and design which is in keeping with the settlement area and contributes to preserving and enhancing the rural identity of the parish and</li> <li>iii. The type and tenure meets the identified needs of local people in housing need and</li> <li>iv. They are available firstly to people with an identified local connection to the parish in line with Cornwall Council policy and</li> <li>v. They are secured as affordable housing in perpetuity and</li> <li>vi. They are sustainably located within walking distance of local services and public transport to main centres and</li> <li>vii. Opportunities for affordable self-build homes are encouraged</li> </ul> <p><i>Revised in light of CC comments</i></p>
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		<p>energy and high levels of insulation as well as be connected to mains sewerage</p> <p>vii. they are sustainably located, within walking distance of <del>Be within easy safe walking distance to</del> local services and such as shops and frequent public transport to main centres.</p> <p>viii. Opportunities for affordable self-build homes are encouraged. <del>Be self build where suitable</del></p>		
5c	Principal Residency	<p>New open market housing, excluding replacement dwellings, will only be supported where there is a restriction to ensure its occupancy as a Principal Residence.</p> <p>A planning condition or obligation will be placed on new open market homes requiring that they are occupied only as the primary (principal) residence of those persons entitled to occupy them.</p> <p>Occupiers of homes with a principal residence condition will be required to keep proof that they are meeting the obligation or condition and be obliged to provide this proof if/when Cornwall Council requests this information. Proof of principal residence is via verifiable evidence which could include, for example, (but not be limited to) residents being registered on the local electoral register.</p>	<p>There is standard text for principal residence policies but the big issue here is that I don't think that St Hilary meets the requirements for a Principal Residency condition (usually &gt;20% unoccupied homes). Review census 2021 data when available to see whether this has changed. An examiner is unlikely to allow this policy with current unoccupied household levels.</p>	<p>Policy 5c Principal Residency</p> <p>New open market housing, excluding replacement dwellings, will only be supported where there is a restriction to ensure its occupancy as a Principal Residence.</p> <p>A planning condition or obligation will be placed on new open market homes requiring that they are occupied only as the primary (principal) residence of those persons entitled to occupy them.</p> <p>Occupiers of homes with a principal residence condition will be required to keep proof that they are meeting the obligation or condition and be obliged to provide this proof if/when Cornwall Council requests this information. Proof of principal residence is via verifiable evidence which could include, for example, (but not be limited to) residents being registered on the local electoral register.</p> <p><i>Retained as there has been strong support from community during consultations for limits on further second homes and holiday lettings.</i></p>



5d	<p><b>Building Development</b> in the open countryside</p>	<p>Where planning permission is required, proposals for development outside of recognised settlements will be supported where :</p> <ul style="list-style-type: none"> <li>c) they meet the requirements of policy 7, or policy 9 of the CLP; or</li> <li>d) they meet the requirements of policy AL1 of the CEDPD;</li> <li>e) <del>or Support for development proposals in open countryside will depend not only on strict</del></li> </ul> <p><del>compliance with Policy 7 of the Cornwall Local Plan, but also with every relevant part of the St Hilary Neighbourhood Plan. Any possible development will be strictly limited to replacement dwellings, subdivision, conversions of suitable buildings and accommodation for temporary workers or essential agricultural workers as per Policy 7 of the Cornwall Local Plan and in conformity with every relevant part of the St Hilary Neighbourhood Plan, particularly with regard to the highly sensitive high quality landscape value and natural environment of the parish as identified in the St Hilary Parish Local Landscape Character Assessment. Applications for conversion of metal or wooden buildings (as opposed to structurally sound traditional stone barns of a suitable size) to dwellings or holiday accommodation will not be supported.</del></p>	<p>Elements that repeat the provisions of CLP policy 7 have been removed.</p>	<p>Policy 5d Development in the Open Countryside</p> <p>Where planning permission is required, proposals for development outside of recognized settlements will be supported where:</p> <ul style="list-style-type: none"> <li>i. They meet the requirements of Policy 7 or Policy 9 of the Cornwall Local Plan and</li> <li>ii. They meet the requirements of Policy AL1 of the Cornwall Emergency Development Plan Document (CEDPD)</li> </ul> <p>Proposals to convert wooden, concrete or metal barns and sheds to residential accommodation will not be supported.</p> <p><i>Revised in line with CC comments</i></p>
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		Proposals to convert wooden or metal barns to residential accommodation will not be supported.		
6a	Sustainable transport and access	<p><b>Proposals for new walking or cycle routes, or improvements to existing routes will be supported where:</b></p> <ul style="list-style-type: none"> <li>a) they are sympathetic to/<del>not in conflict with</del> the coastal and rural character of the parish; and <del>will be supported in principle that help to deliver the following:</del></li> <li>b) <del>Promotion of the use and maintenance of existing public footpaths and bridleways within the parish and surrounding area</del></li> <li>c) They improve <del>maintenance and ii. Improvement of the maintenance and</del> signage of public rights of way within the parish; and</li> <li>d) <b>Effective arrangements are in place for their long-term maintenance</b></li> </ul> <p><b>Provision of safe and pleasant cycle ways and connection points within the parish connecting to the national cycle route network and surrounding areas using the existing shared highway network through support for the introduction of traffic calming, signage, speed restrictions and quiet lanes designation where appropriate</b></p>	Suggested amendments to add clarity.	<p>Policy 6a Sustainable Transport and Access</p> <p>A. Proposals for new walking or cycle routes, or improvements to existing routes will be supported where:</p> <ul style="list-style-type: none"> <li>i. They are sympathetic to the coastal and rural character of the parish and</li> <li>ii. They improve the signage of public rights of way within the parish and</li> <li>iii. Effective arrangements are in place for their long-term maintenance</li> </ul> <p>B. Provision of safe and pleasant cycle ways and connection points within the parish connecting to the national cycle route network and surrounding areas using the existing shared highway network through support for the introduction of traffic calming, signage, speed restrictions and quiet lanes designation where appropriate will be supported.</p> <p>C. Proposals to improve existing or create new pavements adjacent to highways to improve pedestrian safety will be supported.</p> <p><i>Revised in line with CC comments</i></p>

		<p><b>Proposals to improve</b> Improvement of existing or <b>and create new pavements</b> footways adjacent to highways to improve pedestrian safety will be supported.</p>		
6b	Leisure, recreation and community spaces	<p><del>A. Locally important community buildings and facilities for sports (as mapped) and the land associated with recreation should be retained. Existing built facilities should be allowed to modernise and adapt within existing footprints and where height does not exceed two storeys to continue to meet the community's needs. Development that results in the loss or partial loss of areas for health and recreation including footpaths, bridleways, byways and informal areas of open space used for recreation will not be supported.</del></p> <p><del>B. Development to provide leisure or sports facilities will be supported where it can be achieved without impacting on the sensitive historic settlements, natural environment and landscapes of the parish and can show compliance with all of the policies in this plan.</del></p> <p><del>C. Development in the parish that blocks the views and vistas of the countryside and coastal scenery and damages the settings of footpaths, bridleways and byways will not be supported.</del></p>	<p>Proposed alternative text:</p> <p><b>Proposals for new, or improvements to existing community buildings and leisure facilities will be supported where:</b></p> <ul style="list-style-type: none"> <li>a) Any proposed building is a maximum of 2 storeys high; and</li> <li>b) The proposed development does not restrict any valued views or vistas; and</li> <li>c) The design is sensitive to the local historic and landscape character; and</li> <li>d) Sufficient car parking is available</li> </ul> <p><b>Loss or partial loss of community or leisure facilities, including open spaces and rights of way, will only be supported where</b></p>	<p>Policy 6b Leisure, Recreation, Local Facilities and Services</p> <p>A. Proposals for new, or improvements to, existing community buildings and leisure facilities, will be supported where:</p> <ul style="list-style-type: none"> <li>i. Any proposed building is a maximum of two stories high</li> <li>ii. The proposed development does not restrict any valued views or vistas</li> <li>iii. The design is sensitive to the local historic and landscape character</li> <li>iv. Sufficient car parking is available</li> </ul> <p>B. Loss or partial loss of community or leisure facilities, including open spaces and rights of way, will only be supported where:</p> <ul style="list-style-type: none"> <li>i. Alternative facilities of an equal or greater quality are provided nearby or</li> <li>ii. It can be demonstrated that there is no longer any need or demand for the existing facility or</li> <li>iii. The existing facility is no longer economically viable despite all reasonable attempts to maintain it</li> </ul> <p><i>Revised in line with CC comments. Objective 8 and Policy 8a have been amalgamated into a revised Objective 6 Health, Well-being, Local Facilities and Services and Policy 6b</i></p>

			<p>a) alternative facilities, of an equal or greater quality, are provided nearby; or</p> <p>b) it can be demonstrated that there is no longer any need or demand for the existing community facility; or</p> <p>c) The existing community facility is no longer economically viable despite all reasonable attempts to maintain it.</p> <p>You could list the community facilities from 8a in the supporting text and refer to them in this policy.</p> <p>[question – some improved facilities may need a larger footprint – do you want to restrict that – not currently included in the revised policy?]</p>	
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7a	Design	<p>Proposals for development will be supported where</p> <p><del>A. The design has been informed by the St Hilary Parish Design Guide and applicants are encouraged to complete a <del>includes a completed</del> Design Guide checklist</del></p> <p><del>B. The proposal meets the requirements of any future St Hilary parish design code .</del></p> <p><del>C. Applications will include a completed Design Guide checklist in their Design and Access Statements.</del></p> <p><del>B. Applications will be informed by the St Hilary Parish 'Design Guide' prior to submitting an application.</del></p> <p><del>C. The location and scale of any new build will conform to the policies in this plan.</del></p>	<p>Not all developments will need to provide a D&amp;A statement only those in designated areas or where the proposal is for 'major' development (&gt;5 homes in designated rural areas).</p> <p>Location of development has been dealt with in other policies; scale should be included in the design guide / code.</p> <p>The Levelling Up Bill which is currently moving through Parliament contains provisions for Design Codes and we anticipate that parish design codes may become necessary – we are therefore encouraging NDP groups to include provision in their NDPs for a parish design code should these become necessary.</p> <p>Can we review the design guide when available.</p>	<p>Policy 7a Design</p> <p>Proposals for development will be supported where:</p> <p>A. The design has been informed by the St Hilary Parish Design Guide, with applicants being strongly encouraged to complete the design guide checklist</p> <p>B. The proposal meets the requirements of any future St Hilary Parish Design Code</p> <p><i>Revised in line with CC comments.</i></p>
7b	Housing Standards	<p>Proposals for <b>new homes</b> (market-led or affordable) should:</p> <p>A. <del>Demonstrate how they</del> meet the requirements of part M4(2) of building</p>	<p>The lifetime homes standard has been largely eclipsed by optional building regulations standard M4(2) entitled</p>	<p>Policy 7b Housing Standards</p> <p>Proposals for new homes (market-led or affordable) should:</p>

		<p>standards <del>have consulted and applied 'Lifetime Homes Design Principles' and policies in 7a</del></p> <p>B. Include outside space of an appropriate size for the dwelling. <b>Include useable and defined garden space for social discourse, a sense of ownership and security and encouraging gardening and other outdoor activities</b></p> <p>C. Include sufficient <del>attributed</del> off-road parking in order to avoid creating parking issues within the settlements <b>in line with Cornwall Council standards</b></p> <p>D. Include covered bin storage and secure storage within the house or plot design for cycles and other healthy lifestyle equipment</p> <p>E. Use Cornish hedging or walls of local granite for boundaries and not wooden fencing <b>wherever possible</b></p>	<p>'accessible and adaptable dwellings'. Requiring that all new homes meet these standards may impact on viability</p> <p>You can explain why garden space is important in the supporting text</p>	<p>A. Meet the requirements of Part M4(2) of building standards</p> <p>B. Include outside space of an appropriate size for the dwelling</p> <p>C. Include sufficient off-road parking in order to avoid creating parking issues within the settlements in line with Cornwall Council standards</p> <p>D. Include covered bin storage and secure storage within the house or plot design for cycles and other healthy lifestyle equipment</p> <p>E. Use Cornish hedging or walls of local granite for boundaries and not wooden fencing wherever possible</p> <p><i>Revised in line with CC comments.</i></p>
8a	Community Services and Facilities	<p><del>A. Development leading to the loss of an existing community facility or which detrimentally impacts on an existing community facility in such a way that it loses amenity value (including but not limited to the school, the Old School Rooms, the Church, Public House, Supermarket, Memorial Garden, Badcock Green and Rosudgeon and Kenneggy Cricket Club Grounds) will not be supported unless it can be demonstrated that:</del></p> <p><del>i. There is no longer any need or demand for the existing community facility or</del></p> <p><del>ii. The existing community facility is no longer economically viable despite all reasonable</del></p>	<p>This policy repeats much of 6b – consolidate these policies into 1.</p>	<p><i>Revised in line with CC comments. Objective 8 has been amalgamated into a revised Objective 6 and elements of Policy 8a incorporated into the revised Policy 6b</i></p>

		<p>attempts or</p> <p>iii. The proposal makes alternative provision for the relocation of the existing community facility to an equally or more appropriate and accessible location within the Parish which complies with the rest of the policy framework within this neighbourhood plan</p> <p>B. Development proposals seeking to re-establish economically viable community facilities and services will be supported where it can be shown to comply with the policies set out in the NDP, particularly design, and where adequate parking can be provided.</p>		
9a	Employment Space	<p>Conversion of existing buildings where redundant and suitable will be supported where they will be used for workspaces. Small scale employment and/or business development (including small workshops) will be supported within or adjoining the main settlements of the parish.</p> <p>Proposals that are not well related to the main settlements will be required to demonstrate appropriately why such a location is required, is sustainable and responds to a local need.</p>	<p>Proposals to convert existing buildings into workspaces, or for the development of new employment space, will be supported where they are within or adjoining established settlements.</p> <p>Proposals for sustainable new employment space outside of established settlements will be supported where a clear locational need for the business on the proposed site can be demonstrated.</p>	<p>Policy 8a Employment Space</p> <p>A. Proposals to convert existing buildings into workspaces, or for the development of new employment space, will be supported where they are within or adjoining settlement boundaries.</p> <p>B. Proposals for sustainable new employment space outside of settlement boundaries will be supported where a clear locational need for the business on the proposed site can be demonstrated and no suitable alternative exists.</p> <p><i>Revised in line with CC comments.</i></p>

9b	Agriculture	<p>Support will be given to conversion of existing redundant farm buildings which are unsuitable for modern agriculture into proposals for small scale work units for small enterprises and self-employed sole traders. Conversion into residential or holiday units will only be supported in exceptional cases and for structurally sound traditional stone buildings of a suitable size where this underpins other policies in the plan including those related to heritage, design and the environment.</p> <p>Small scale new buildings will be supported where they are physically contained within the existing built farm settlement and comply with the rest of the NDP.</p> <p>Any planning application to change the use of an unfarmed field will only be supported where it is to return the field to agricultural or horticultural use.</p>	<p>There are a few issues with this policy. Many barn conversions will be permitted development and will not require planning consent.</p> <p>Some unfarmed fields may be adjacent to settlements and potentially suitable for affordable housing or other use – you cannot have a blanket policy restricting the use of any site to agricultural / horticultural uses. Any restrictions on development outside the development boundaries should be included in policy 5d</p> <p>Suggested amended policy:  <b>Where planning permission is required, proposals for the conversion of existing redundant farm buildings will be supported where:</b></p> <ul style="list-style-type: none"> <li>a) It would create new small scale employment space;</li> <li>or</li> <li>b) If it is for residential use (including holiday use), only</li> </ul>	<p>Policy 8b Agriculture</p> <p>A. Where planning permission is required, a proposal for the conversion of existing redundant farm buildings that conforms with the CLP change of use policy will be supported where:</p> <ul style="list-style-type: none"> <li>i. It would create new small scale employment space or</li> <li>ii. If it is for residential use (including holiday use), only where it would preserve a structurally sound, traditional stone building of a viable size</li> </ul> <p>B. Proposals for new buildings which would support an existing farm business will be supported where any new building is located within the existing built farm settlement.</p> <p>C. Proposals for agricultural or horticultural uses on unused fields will be supported.</p> <p><i>Revised in light of CC comments</i></p>
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			<p>where it would preserve a structurally sound, traditional stone building</p> <p>Proposals for new buildings which would support an existing farm business will be supported where any new building is located within the existing built farm settlement.</p> <p>Proposals for agricultural or horticultural uses on unused fields will be supported.</p>	
9c	Tourism	<p>A. Tourism will only be supported where it can be demonstrated that it makes use of existing built infrastructure, contributes to a diversity of accommodation provision and does not result in an adverse heritage, visual and landscape impact or reduce the number of residential dwellings.</p> <p>B. Tourism development in river floodplains will not be supported.</p> <p>C. Proposals for tourist accommodation should be within easy walking distance to the widest range of sustainable transport modes available in the area and be appropriate in</p>	<p>Your policy can only consider planning uses – so not tourism, but development that might have a tourism function.</p> <p>Proposals for development that support the tourism industry, including permanent and temporary accommodation, will be supported where:</p> <p>a) the scale and design of accommodation will not have a</p>	<p>Policy 8c Tourism</p> <p>A. Proposals for development that support the tourism industry, including permanent and temporary accommodation, will be supported where:</p> <p>i. The scale and design of accommodation will not have a negative impact, including consideration of any cumulative impact on heritage assets, on landscape character or any negative visual impact on the rural character of the parish area and</p> <p>ii. Where the proposal does not involve the net loss of any existing residential dwellings and</p> <p>iii. Where the proposed development is not on any known floodplain and</p>

		<p>scale and character to their setting and location. Such proposals should have regard to the need to maintain a range of tourist accommodation types in the parish.</p> <p>D. Proposals to increase the scale and scope of camping, caravan and holiday cottage accommodation particularly within the Area of Outstanding Natural Beauty and World Heritage Site will not be supported.</p> <p>E. Proposals for caravan and camping sites must demonstrate that there is a need for additional tourist accommodation and the scale and design will not have a negative impact on the area.</p>	<p><b>negative impact, including consideration of any cumulative impact, on heritage assets, on landscape character or any negative visual impact on the rural character of the parish area; and</b></p> <p><b>b) Where the proposal does not involve the net loss of any existing residential dwellings; and</b></p> <p><b>c) Where the proposed development is not on any known floodplain; and</b></p> <p><b>d) Where the proposal is in a sustainable location, within walking distance to sustainable transport links; and</b></p> <p><b>e) Where the proposal contributes to the diversity of tourist accommodation within the parish; and</b></p>	<p>iv. Where the proposal is in a sustainable location, within walking distance to sustainable transport links and</p> <p>v. Where the proposal contributes to the diversity of tourist accommodation within the parish and</p> <p>vi. There is a clear demonstration of the need for additional tourist accommodation at the proposed location</p> <p>B. Proposals for new or expanded tourist accommodation (to include camping, caravans and other holiday accommodation) will not be supported within the AONB or the World Heritage Site.</p> <p><i>Revised in line with CC comments.</i></p>
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			<p>f) There is a clear demonstration of the need for additional tourist accommodation at the proposed location.</p> <p>Proposals for new or expanded tourist accommodation (to include camping, caravans and other holiday accommodation) will not be supported within the AONB or the World Heritage Site.</p>	
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<b>Cornwall Council Response</b>	
<b>Neighbourhood Development Plan Proposal</b>	
<b>Consultation documents</b>	<b>St Hilary Neighbourhood Development Plan</b>
<b>Consultation Start Date</b>	<b>12/10/22</b>
<b>Consultation End Date</b>	<b>15/11/22</b>
<b>Cornwall Council Team</b>	<b>Response Date</b>
<b>Affordable Housing</b>	
<b>Development Management</b>	
<b>Development Management – Area Team</b>	
<b>Economic Development</b>	
<b>Education Infrastructure</b>	
<b>Environment Service - Ecology</b>	The Lead Local Flood Authority has been consulted on the St Hilary NDP. Please note that we cannot provide comments in relation to foul sewer networks are the responsibility of South West Water Ltd and so comments must be provided by them.

	<p>Please find attached comments in relation to sustainable drainage systems. Consideration should be given to the attached guidance note and the National Planning Policy Framework (July 2021) paragraphs 159 to 169 (inc). The following links should be of assistance:</p> <p><a href="https://www.gov.uk/government/publications/national-planning-policy-framework--2">https://www.gov.uk/government/publications/national-planning-policy-framework--2</a>  <a href="https://www.cornwall.gov.uk/floodrisk">https://www.cornwall.gov.uk/floodrisk</a>  <a href="https://www.cornwall.gov.uk/media/h1ynydgr/evidence-strategic-flood-risk-assessment-june-2017.pdf">https://www.cornwall.gov.uk/media/h1ynydgr/evidence-strategic-flood-risk-assessment-june-2017.pdf</a></p> <p>Further information relating to sustainable drainage systems can be found by following the link below:</p> <p><a href="https://www.susdrain.org/delivering-suds/using-suds/background/sustainable-drainage.html">https://www.susdrain.org/delivering-suds/using-suds/background/sustainable-drainage.html</a></p> <p>Kind regards</p>
<p><b>Environment Service – Flood and Coastal Environment Officer</b></p>	
<p><b>Environment Service - Open Spaces Officer</b></p>	<p>The National Planning Policy Framework 2021 (para 98) requires that planning policies should be based on robust &amp; up to date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. Whilst this assessment was done for larger settlements including Penzance &amp; Long Rock, it has not been undertaken in St Hilary Parish. However, this sort of study is not appropriate for such dispersed rural communities and would only be worthwhile for a larger settlement such as Goldsithney, the edge of which would spill into this parish.</p> <p>Four open spaces are identified in policy 1c for designation as Local Green Space. Whilst these are indicated in Map 1c, no further evaluation is considered. Differentiating the spaces by their functions &amp; quality would help to assess possible deficiencies and opportunities for improvement – see the different types of open space categorised in <a href="https://www.cornwall.gov.uk/parks-leisure-and-culture/parks-and-open-spaces/open-space-strategy-and-standards/">https://www.cornwall.gov.uk/parks-leisure-and-culture/parks-and-open-spaces/open-space-strategy-and-standards/</a></p>

	Thank you for consulting the Public Space Team.
<b>Environment Service- Landscape</b>	
<b>Environment Service- Forestry</b>	
<b>Historic Environment</b>	<p><b>Comments from Strategic Historic Environment team:</b></p> <ul style="list-style-type: none"> <li>- Really good to see Heritage mentioned within the parish vision and as a priority objective in its own right, but also for the value of the historic landscape and local distinctiveness to be mentioned in the Natural Environment, Landscape and Health &amp; Wellbeing objectives as well.</li> <li>- Distinctiveness could also be picked up in the Housing objective as a policy, promoting local building materials and traditional building skills and an assessment of local distinctiveness to inform design of new housing. This is picked up under the Design objective, but both could be strengthened by reference to use of the Distinctiveness Assessment Framework: <a href="#">Cornish Distinctiveness   Let's Talk Cornwall</a></li> <li>- Strongly recommend reference to the complementary guidance found in the Let's Talk Cornwall Cornish Distinctiveness pages. In particular reference to Historic Farmsteads guidance and the Sustainable Building Guide and Improving Energy Efficiency in Historic Buildings</li> </ul> <p>Policy 1b Biodiversity and Green Infrastructure</p> <ul style="list-style-type: none"> <li>- Would welcome reference to heritage features and furniture in addition to or aspects of Cornish Hedges such as hollow ways and stiles and their importance as aspects of semi natural habitats, green infrastructure and connections.</li> <li>- Paragraph 7.1b.6 – would suggest reference to Miners Small Holdings here</li> </ul> <p>Policy 2a Landscape Character</p> <ul style="list-style-type: none"> <li>- Would also make reference to the need for undertaking Cornish Distinctiveness Assessments for any new developments</li> </ul> <p>Policy 3a Historic Character</p>

- Could make reference to the adopted historic environment strategy for Cornwall: <https://letstalk.cornwall.gov.uk/heritage-strategy>
  - Add the link to the Cornish Distinctiveness Assessment Framework: [Cornish Distinctiveness | Let's Talk Cornwall](#)
  - [Link to Cornwall 1994 HLC mapping Cornwall and the Isles of Scilly's Historic Environment](#)
- Policy 3b Heritage Assets
- Again, could add link to the Distinctiveness Assessment Framework in 'A'
  - 7.3b.2, suggest use of Heritage specific mapping site: [Cornwall and the Isles of Scilly's Historic Environment](#)
  - 7.3b.3, suggest specific reference to [Cornish Distinctiveness Assessment Framework](#)
  - 7.3b.4, suggest 'Grade I' rather than writing 'grade one' (4.21 also)
  - 7.3b.5, suggest reference to the [Historic Environment Record mapping](#) here. You acknowledge that this list is being updated but not a source for later additions.
- Policy 4a Renewable energy
- 7.4a.2 mentions ground source heat pumps being supported, what about also mentioning air source heat pumps?
- Policy 6a Sustainable transport and access
- Might be worth making specific reference to protecting historic stiles as part of the distinctive character of the parish, a valued part of the enjoyment that people have of walking on historic routes across the parish and the coastal footpath. So whilst very much wanting to encourage benefit of health & wellbeing, there are ways of improving accessibility without removal of any of the historic features, such as stiles, along these routes. So where it talks about 'promotion of the use and maintenance of existing public footpaths and bridleways.. improvement of the maintenance and signage..' then could mention protection of historic features here at 7.6a.2? Or could put in Policy 6b Leisure and

	<p>recreation bottom of p.68 where says that development in the parish that ‘damages the settings of footpaths’ etc. could add importance of retaining historic features like stiles</p> <p>Policy 7a Design</p> <ul style="list-style-type: none"> <li>- Could add link to Cornish Distinctiveness Assessment at 7.7a.7 and/or at 7.7b.2</li> </ul> <p>St Hilary Design Guide – please provide the link to the <a href="#">Distinctiveness Assessment Framework</a>, applies to all the policies in this section</p> <p>Policy 9b Agriculture - recommend conversion of existing redundant farm buildings references Cornish Distinctiveness and Farmsteads guidance.</p>
<b>Local Plan Team – Community Infrastructure Levy</b>	
<b>Local Plan Team</b>	See policy comments in the table above
<b>Cornwall Fire and Rescue Service</b>	
<b>Transport</b>	No comments



