

# Wadebridge Area Neighbourhood Plan

## Analysis of Regulation 14 Comments

### Purpose of Report

1. To advise members of the Neighbourhood Plan Steering Group and the three councils of the nature of the comments received on the Pre-Submission Version of the Wadebridge Area Neighbourhood Plan and make suggestions as to how they may choose to react to them.

### Context

2. A Pre-Submission Version of the Wadebridge Area Neighbourhood Plan was made available for consultation under the terms of Regulation 14 of the Neighbourhood Planning Regulations<sup>1</sup>. The version of the Plan that was posted on the Wadebridge Town Council website<sup>2</sup> was that which had been considered by Egloshayle Parish Council, St Breock Parish Council and Wadebridge Town Council in August/September 2017. The consultation period ran for a period of eight-weeks from Monday 19th March 2018 to Friday 11th May 2018. Notice of the consultation was sent to all statutory consultees and publicised widely in the neighbourhood area. Four public exhibition days were held at Wadebridge Town Hall.
3. Following the closing date of the consultation, it was decided by Wadebridge Town Council that to comply with the new data protection guidelines<sup>3</sup> (GDPR), which came into force during the consultation period, the identity of individuals making comments could not be revealed during the analysis process. A redaction exercise therefore had to take place to ensure that individuals who had freely provided their name and address, could not be identified in subsequent documentation.
4. I was asked to carry out an analysis of the responses on the basis that I too would not have access to the original unredacted response forms.
5. The Wadebridge Town Council website (at August 2018) announced that following the redaction *"we are now at the position where the responses can begin to be analysed. In addition to the analysis of the information being carried out for and on behalf of the NHP Steering Group, Wadebridge Town Council will be carrying out an in-house analysis of the comments received to ensure that the Draft NHP reflects the wish of the people of Wadebridge"*.

### Overview

6. 255 separate submissions were received and registered as bona fide comments on the Pre-submission Version of the Wadebridge Area Neighbourhood Plan. Because of the redaction process, only 22 of the responses can be attributed to a named organisation or business. 233 of the submissions have been made by individuals who cannot be identified, and whose names and addresses have not been made available for this analysis. I have good reason, by way of the content and nature of the comments, to believe that most of the respondents are residents of the neighbourhood area. Exactly where they live and what their specific interests are, must remain unknown. However, I am satisfied that their views and opinions should be considered. The named respondents include Cornwall Council, the Environment Agency, Historic England, Natural England and Devon and Cornwall Police; and substantial contributions and representations have been made by consultants on behalf of local landowners and/or developers.

### Regulation 14 Consultation

7. Regulation 14 of the Neighbourhood Planning (General) Regulations 2012 requires the qualifying body, before submitting the Plan to the local planning authority, to:
  1. *publicise, in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area—*

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<sup>1</sup> <http://www.legislation.gov.uk/ukxi/2012/637/contents/made>

<sup>2</sup> <https://www.wadebridge-tc.gov.uk/nhp.html>

<sup>3</sup> <https://www.gov.uk/government/publications/guide-to-the-general-data-protection-regulation>

- i. *details of the proposals for a neighbourhood development plan;*
  - ii. *details of where and when the proposals for a neighbourhood development plan may be inspected;*
  - iii. *details of how to make representations; and*
  - iv. *the date by which those representations must be received, being not less than 6 weeks from the date on which the draft proposal is first publicised;*
  2. *consult any consultation body referred to in paragraph 1 of Schedule 1 whose interests the qualifying body considers may be affected by the proposals for a neighbourhood development plan; and*
  3. *send a copy of the proposals for a neighbourhood development plan to the local planning authority.*
8. A 1<sup>st</sup> version of the Neighbourhood Plan has previously been shared with those “*who live, work or carry on business in the neighbourhood area*” and the local planning authority on an informal basis. It was amended significantly because of the comments received and the views expressed in the debate on local planning issues that took place at the time of the 1<sup>st</sup> consultation (January to March 2017). Regulation 14 consultation has enabled the three councils to share the revised version of the Plan with the community and local stakeholders. It was also the opportunity to present the community’s Plan for scrutiny by a wider audience of critical organisations that included: Natural England, the Environment Agency, Historic England; an array of service providers; and notable representative bodies<sup>4</sup>.
9. A main purpose of the Regulation 14 consultation is to make the Plan better. The comments made by most respondents are positive in intent. It is beholden on the Steering Group and the three councils to take heed of the all the comments and suggestions received and amend the Plan as it considers appropriate or necessary before submitting the Plan to the local planning authority.

## Conclusions

10. It should be reported up front that much of the Pre-submission Version of the Wadebridge Area Neighbourhood Plan has been received positively. With minor amendments, many of the draft policies can easily be readied for submission. Although the time that has lapsed since the initial plan preparation will also necessitate some up-dating of the evidence and the strategic context. There is a revised NPPF<sup>5</sup> to consider, for instance.
11. The policy segment of the Plan is divided into ten topics. The policy approach and content of seven of the topic sections (Jobs and Economy, Housing, Renewable Energy, Transport and Traffic, Arts and Culture, Sports and Recreation and Community Infrastructure) have received a general endorsement. The three other topic sections (Sustainable Development, Natural Environment and Town Centre and Retail) account for much of the response and have attracted most of the critical comments. The policy content for all three topics will require revisiting because of the nature of the comments received and the weaknesses identified.
12. Regarding the ‘Town Centre and Retail’ section, most respondents seem comfortable with the general approach to the future development and wellbeing of the town centre and its functions. However, the Trevilling Quay policy (TR04) has generated a significant critical response that necessitates a review of the scope and effect of the policy. Importantly too, the Environment Agency points out that this section fails to acknowledge adequately the increasing threat of flooding. It has usefully provided a draft flood mitigation strategy for Wadebridge which will be helpful when re-drafting of the Plan.
13. The ‘Natural Environment’ policies have generally been well received. However, the views and concerns expressed by agencies such as Natural England and the Environment Agency about the value and efficacy of some of the policies as drafted, necessitates additional work and refinement.

<sup>4</sup> [http://www.legislation.gov.uk/ukxi/2012/637/pdfs/ukxi\\_20120637\\_en.pdf](http://www.legislation.gov.uk/ukxi/2012/637/pdfs/ukxi_20120637_en.pdf)

<sup>5</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/740441/National\\_Planning\\_Policy\\_Framework\\_web\\_accessible\\_version.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/740441/National_Planning_Policy_Framework_web_accessible_version.pdf)

The aim should be to use the available evidence to ensure that the policies will safeguard the natural environment in the context of a major growth strategy.

14. It is the growth strategy and the allocation of sites as proposed in the 'Sustainable Development' section that has attracted the most attention and reaction. The revisions made to the Plan following the 1<sup>st</sup> consultation have not received a particularly positive response from the community. Whilst the local feedback is not all negative, there is enough of an indication to suggest that a major rethink might be necessary, or the Plan will fail the ultimate community test i.e. the referendum.
15. In its present form however it is unlikely that the Plan will get to the referendum stage. The statutory consultees and the submissions from consultants on behalf of landowners and/or developers have identified some fundamental weaknesses in the growth and development strategy, as presented in the draft Plan and the supporting documentation, that cannot be ignored. Most significantly the respondents have exposed a disconnect between the evidence base presented (including SEA), the 1<sup>st</sup> version of the draft Plan and the Pre-submission Version's site allocations. It is asserted that the reasons for the preference for major growth on land east of Bodieve, over other potentially developable sites, is neither made sufficiently clear nor justified in terms of viability and deliverability in either the Plan itself or the supporting documents. Significantly too, Natural England has expressed serious concerns about site selection and the extent of land allocated in policy SD04.
16. There is work to do; whether it be to re-affirm and justify the current policy approach and preferences, and provide a clear and rational 'audit trail' in support; or to reconsider the preferred allocation sites, because of local opposition and changing circumstances; or to think again about how the future growth requirement for the Wadebridge area (as determined by the Local Plan) can be best influenced by the Neighbourhood Plan.
17. Not all is lost. Taken on a policy by policy basis I have concluded that:
18. Draft policy SD01 – a built-up area boundary is an acceptable device to focus future development on land within Wadebridge and effect some control over the developer's interest in land outside of the built-up area. The BUAB in the Pre-submission Version of the Plan needs reviewing and may require relatively minor amendment in the light of the comments made on specific locations and recent decisions taken on several planning applications.
19. Draft policy SD02 – a countryside policy is appropriate, but it must be fully in sync with other growth and development policies to ensure that the major growth required is not at the cost of the most precious and sensitive areas of countryside.
20. Draft policy SD03 – this policy, which allocates several larger sites within the built-up area for development, has been made largely redundant by time and the decisions taken by the local planning authority. Two of the 'allocated' sites now have outline planning consent and, as 'commitments', should now be regarded as candidates for inclusion within a revised BUAB.
21. Draft policy SD04 – the choice of and justification for a major mixed-use development on the land allocated by this policy has been challenged and therefore needs further contemplation. The viability of development in this area has been questioned. It is also claimed that the policy is not detailed enough either in terms of the requirements it seeks, or scale of development that is acceptable. Nor does it provide adequate safeguards to satisfy critical friends such as Natural England and Cornwall Council.
22. Draft policy SD05 – it is generally accepted that the Plan should address character issues. How this is best done needs to be re-considered in the context of other growth and development policies. Revised policies could benefit from more site-specific context and character considerations including heritage impact, which Historic England consider is inadequately addressed at present.
23. Taken together, it is clear that the 'Sustainable Development' section and other policies related to the preferred growth strategy need an overhaul. From my analysis and understanding of the

situation however, I am not at all certain that a site-allocating strategy within the Neighbourhood Plan will be achievable, largely because of the likely local opposition and resistance to any specific major allocation, and a situation made more complex by the promotional activities of various landowners and developers.

24. Without prejudicing future decision-making of the Steering Group and the three councils, I would suggest that a way out of the dilemma may have to be:
  - a reviewed and revised built-up area boundary to accompany a BUAB policy
  - a revised countryside policy that protects the most sensitive areas of countryside
  - an edge of BUAB policy to provide context to the planning application process and ensure fit with the NPPF presumption in favour of sustainable development
  - an amended policy that seeks to safeguard and enhance local character for all major new development
25. This may be the easiest, or only, route in terms of reaching any kind of community consensus or truce, whilst exercising some control over growth.
26. However, the implications of a decision not to allocate sites need to be comprehended. Decisions may well be taken on applications prior to 'approval' of the Plan, in locations which may or may not be those preferred by the community, by the qualifying body or both. Also, if Cornwall Council cannot identify a 5-year housing land supply at any point during the plan period, Wadebridge will become subject to speculative developments (a carte blanche for developers!). If the Plan allocates, it buys some additional time (and greater control in the short-term over speculative applications) as Cornwall Council only need demonstrate a 3-year housing land supply for the first two years of the Plan's life after being Made<sup>6</sup>. With the Cornwall Site Allocations DPD now at the 'Proposed Modifications' stage, it is too late to allocate sites through this document. It is a difficult conundrum.
27. These risks need to be factored in. Whatever approach is to be pursued, it is vital that the local planning authority is fully involved and fully in accord with it. The implications and opportunities of the changes in the NPPF should be a part of the consideration.
28. I would recommend that the next steps, prior to amending the Neighbourhood Plan, should be:
  1. Resolving the several issues, raised by the respondents relating to the SEA<sup>7</sup>. AECOM should be asked to address these as soon as possible to inform any review of the growth and development strategy
  2. This should be followed by meetings with Cornwall Council and Natural England to discuss what is possible and preferable
  3. Ensure the three councils are made fully aware of the choices and their ramifications
  4. It would help then to put out a statement to say what approach is being taken, prior to making amendments to the Plan

### The Response to the Pre-Submission Version of the Plan

29. What follows next in this report is an 'Executive Summary' of the comments as they relate to the individual topics and policies in the Pre-submission Version of the Plan. It should help the reader appreciate the extent and nature of the responses received during the Regulation 14 consultation on the Plan.
30. A full analysis of the responses received during the Regulation 14 consultation follows on from page 13. Using the order of contents of the Plan, members of the Steering Group and the three councils are provided with a summary of each comment received, as it applies to the different topics and policies in the Plan; my interpretation of each comment, focussing on the planning aspects of the representation; and my suggestions on how the Steering Group should react to each and every one of them.

PW/WANP/Sep18

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<sup>6</sup> Subject to caveats and criteria contained in the NPPF, paragraph 14

<sup>7</sup> SEA = Strategic Environmental Assessment

## Wadebridge Area Neighbourhood Plan

### Analysis of Regulation 14 Comments - Executive Summary

#### General Comments on Plan

Just over 60% of 26 general observations on the Plan are simple and straightforward unqualified statements of support. Eight submissions express disapproval of the Plan. In most of these cases, the respondent is opposed to the scale of growth that the Plan has had to accede because of the target set by the Cornwall Local Plan.

#### Introductory Sections 1-8

Aside from a list of suggested corrections and amendments from the local planning authority, only two comments were received that are directed towards the introductory and scene-setting sections of the Pre-Submission Version of the Plan. The comments and suggestions received should be considered when the introductory sections are up-dated, which will be necessary given the time that has passed since it was drafted.

#### Sustainable Development - General

People reacting to campaigns, to maps displaying discarded development options and also commenting on what is not in the Plan rather than what is in the Plan, has added an extra dimension to the process of analysis; and made interpretation more complex. What does seem apparent from the community's response to the development strategy proposed in the Pre-submission Version of the Plan is that the choice of sites for development is not something that is likely to achieve a consensus. Whilst it is inevitable that people who disagree with something are more likely to let their views be known than those that agree, this expression of disagreement cannot be ignored. In response to the general approach proposed to sustainable development and growth, the community's response reflects the array of opinions, concerns and fears that are out there, which will need to be reconciled in any review of the overall strategy.

Such a review is called for by those that have responded on behalf of land owners and developers. Several have made the point that the Pre-submission Version of the Plan, with its supporting documents, lacks enough evidential detail and explanation to justify the current set of policies and the preferred allocations. Whilst Cornwall Council has not been as critical of the overall strategy or site allocations, it is clear from its comments, that it believes the sustainable development policies and their context would benefit from being up-dated, to take into account current circumstances and context, and refinement to provide greater clarity.

#### *Policy SD01 Built-up Area Boundary and Development Within Wadebridge Town'*

Community respondents are generally happy with the concept of a built-up area boundary and the consultation boundary delineated on map C in the Pre-submission Version of the Plan.

The contributions from the organisational and business respondents is, with a couple of exceptions, supportive of the policy approach. Indeed, there is little criticism of the wording of the policy. The main criticism is the fact that the boundary is now out-of-date. Using the established criteria, there are sites that are now the subject of an outline planning consent that should be included within a revised BUAB.

#### *Policy SD02 Development in the Countryside*

Community respondents are generally happy with a policy that seeks to place constraints on development within the countryside.

The limited contributions from the organisational and business respondents are less well-disposed towards the policy, at least as it may affect countryside on the edge of Wadebridge which it is suggested may be of lesser quality than countryside further out from the town, much of which has a statutory protection. Cornwall Council has expressed some concerns about the role and scope of the policy.

The purpose of the policy was to complement the other sustainable development policies and create an appropriate distinction between land where there is a presumption in favour of development and land where there is not. It may be that that distinction should be less binary. No-one is denying the importance of policies designed to safeguard the character and purpose of the countryside. However, as this policy is

inextricably part of the growth and development strategy there is a need for its purpose and its likely impact to be considered as part of a review of the growth and development strategy.

#### *Policy SD03 Housing Site Allocations*

The policy itself is now out-of-date. Despite significant concern expressed by the several community respondents about development on the allocated sites, outline planning consent has been given for two of the sites named in the policy.

Whilst the policy itself may be largely redundant, there is a need to react to the concerns expressed by local people (largely about the potential harmful impact of major development within the built-up area on the surrounding area and infrastructure) and ensure as far as possible that these concerns are addressed in the revised policies in the Plan.

Historic England and Natural England have expressed the view that the site policies allocating sites/areas for development, even within the built-up area, must include a requirement for development proposals to assess adequately the potential impact it may have on its surroundings, and ensure any adverse impact is minimised or mitigated. Cornwall Council requests that the context for the site allocation policies is brought up-to-date and provide sufficient detail to justify and explain the policy on a site by site basis.

#### *Policy SD04 Mixed Use Site Allocation*

The current version of policy SD04 came about as a response to the reaction received to the growth strategy proposed in the 1<sup>st</sup> Consultation Version of the Neighbourhood Plan. It was recognised that in changing the strategy from one that was based on containment within the by-pass boundary during the plan period, to one that allocated a substantial area of land for development outside of this physical barrier, was likely to have opposition locally. This has proven to be the case. It should be noted however that not all community respondents are opposed to the principle of developing housing on and to the east of Bodieve.

The divisive impact of trying to accommodate the Local Plan target, is fully exposed by the community comments received about policy SD04. The policy presented in the Plan reflects the conclusions of the assessments and subsequent debate that was held by the three councils before the Pre-Submission Version of the Plan was published. Much of that debate is reflected within the 65 community comments. Sixteen respondents have submitted a pre-prepared case against the development of 'land east of Bodieve' that sets out the several planning and development issues as described by those leading the campaign against the earmarking of this land. A further 22 respondents have expressed opposition to the potential development of 'land east of Bodieve' and given their own reasons. It should be noted that there are 13 community submissions that express support for the policy in a relatively unqualified manner.

The contributions from the 'development industry' is plainly influenced by their particular land/site interests. It is also clear however, from the views that they have expressed, that the Pre-submission Version of the Plan has failed to demonstrate adequately and clearly how the preferred strategy will achieve the strategic targets and how the preferred site allocation policies are considered deliverable in a sustainable manner. Any review of the growth and development strategy needs to ensure that the Plan, along with its supporting documents, addresses this disconnect between the policies and the evidence-base presented (including the SEA). To fail to provide an adequate and convincing audit trail is likely to result in continued objection from the 'industry' as the Plan goes forward; and conclude with expensive and time-consuming hearings at the Examination stage.

Historic England and Natural England have expressed concerns that policy SD04 in the Plan is not adequately supported by evidence that impact on the character of the surrounding area has been considered and adequately protected by site-specific criteria.

Cornwall Council is most concerned about clarity. All site allocation policies should have clearly understandable and justifiable criteria and be supported with adequate context and evidence-based justification and explanation.



### *Policy SD05 Local Character*

There is little objection or criticism of draft policy SD05 and no reaction at all to it from the ‘development industry’. This may be because, as pointed out by Cornwall Council, the policy as presently drafted does not sufficiently place the onus on the developer to demonstrate how the policy requirements have been met. The local planning authority suggests that the policy could be reworded. It is also suggested that more explanation is provided as to what are the essential aspects of the area’s character and how it varies between locations, which should be taken into account and safeguarded.

### *Natural Environment - General*

In several cases the respondent has helpfully suggested that a little more emphasis could be made in the introductory section about aspects such as farming’s contribution and trees and hedges. The Environment Agency has suggested that the Plan adopts a “hierarchy of environmental protection and enhancement”, which may provide added context and justification for the policies in this section. It has provided guidance on this matter. Cornwall Council has requested improved links to the background evidence.

### *Policy NE01 Protection of the Natural Environment*

Whilst Cornwall Council suggests that the policy should be deleted as it adds nothing, it does also attract some positive/constructive comments from the Council together with the Environment Agency and Natural England. It should be possible to use the current draft policy as the basis of a revised policy that will accommodate the suggestions received.

There is no response and certainly nothing negative from community sources or the ‘development industry’.

### *Policy NE02 Areas of Ecological Significance*

It seems that the community is generally satisfied with the policy and its intentions. Significant, but potentially conflicting, comments have been received from Cornwall Council and Natural England. Cornwall Council seems to be content with the policy and makes a few suggestions as to how it can be better presented. Natural England however question the worth of the policy, as it seems to be less robust in the protection of Local Wildlife Sites than the policy in the Local Plan. A discussion with both parties might be a useful next step.

### *Policy NE03 Protection of Landscape Character*

It seems that the community is content with the policy and its intentions. Significant comments have been received from both Cornwall Council and Natural England. The implication of these comments is that policy NE03 is acceptable, but the policy and its presentation would benefit from adjustment.

### *Policy NE04 Nesting Boxes*

It seems that the community is content with the policy and its intentions. Significant comments have been received from a developer’s representative and Natural England reflecting two different perspectives on the matter. There is no objection to swift boxes being provided on most properties in new developments. The developer’s view is that it may not be appropriate for all buildings in all locations. Natural England is concerned to ensure that developers recognise that this policy requirement is in addition to any other biodiversity enhancements required in accordance with the NPPF and the Local Plan. A minor adjustment to the policy wording should satisfactorily deal with the concerns expressed.

### *Policy NE05 Wildlife Corridors*

It seems that the community is content with the policy and its intentions. Significant comments have been received from both Cornwall Council and Natural England. Both point out that some way of better indicating the wildlife corridors would help the policy’s interpretation. Cornwall Council has also requested additional wording to place an onus on developers to demonstrate how they comply with the policy. These matters can be addressed in part by additional wording in the policy and a reference for developers to a source of information on local wildlife corridors.

### *Policy NE06 Camel Trail*

The community is generally happy with a policy that supports further improvements and extensions to the walking and cycling network in the area, including a better link to Sladesbridge.

A few people feel that the consequences of encouraging a greater number of cyclists on local roads and destinations needs to be taken more into account, and perhaps not all routes should be dominated by cyclists. Perhaps a caveat could be included in the policy to deal with this matter.

#### *Policy NE07 Local Green Space*

The response has been very positive to the policy and the areas it is proposed to designate as local green spaces. The only 'issue' to be resolved is whether the boundary for the Trenant Vale area is the correct one in the context of the criteria of the NPPF as well as the local area and community.

#### *Jobs and Economy - General*

All of the respondents appear supportive of the general 'thrust' of the policies as they relate to jobs and the local economy. There is a call from the community for more space and more flexibility in policy to help local enterprise.

#### *Policy JE01 Existing Business*

Community response to the policy is very limited but favourable. Other contributions are limited to that from Cornwall Council only. The Council has expressed concern that the policy does not conform with Local Plan Policy 5. The NP policy is more stringent. This should not be a problem if the Local Plan policy is deemed not to be a strategic one and the policy in the Neighbourhood Plan is adequately supported by local evidence and justification. A discussion with the local planning authority is required.

#### *Policy JE02 New Employment Opportunities*

Community response to the policy is limited to one respondent that suggests the use of selective adjectives would help the policy achieve what it is intended to do. Cornwall Council has also made a suggestion about re-wording the policy. A review of the policy-wording in the light of the comments and in the interests of clarity and simplicity would be appropriate.

#### *Policy JE03 Farm Business Diversification*

Community response to the policy is limited to one respondent that has suggested that an extra criterion and the use of selective adjectives would help the policy achieve what it is intended to do. Cornwall Council has also made a suggestion about revising criteria. A review of the criteria and their wording in the light of the comments and in the interests of clarity and simplicity would be appropriate.

#### *Town Centre and Retail - General*

The town centre and retailing in the area is a topic that has drawn markedly more comments from the community than from organisations and businesses. Only the Environment Agency has made comment in a general way on the topic. It points out that the 'Town Centre and Retail' section and its policies makes scant reference to flood risk and wants to see a clear reference to the need to plan for an increasing flood risk to the town centre.

The community respondents have highlighted some of the other town centre 'issues' that are very current, although most are beyond the scope of the NP i.e. traffic, disabled access to the Town Hall, and a declining retail sector.

#### *Policy TR01 Town Centre Development*

Community response is limited to three. One is supportive of the policy as written, the other two conflict with each other (by doubting the future demand for commercial space, in one case, or proposing an enlarged commercial area in the other). Neither offer compelling arguments for a change of policy. Cornwall Council is generally content with the policy and its purpose but would like the policy statement to be more connected to Local Plan Policy 4 by reference to it in the policy itself, rather than just in the supporting text. More fundamental is the point made by the Environment Agency about the lack of reference to future flood risk, particularly in the town centre. There is a need to consider, in discussion with the LPA and the Environment Agency, whether Local Plan Policy 26 'Flood risk management and coastal change', is sufficient; or whether a more specific policy or criteria are required in the Plan to address the concerns expressed.



### *Policy TR02 Major Retail Development*

There is no community objection to the draft policy. Cornwall Council's position seems to be supportive of the general policy approach but critical of the policy itself. A discussion with the LPA is required.

### *Policy TR03 Pedestrian Priority in the Town Centre*

Community response to the policy is very limited but supportive of extensions to the pedestrianisation-restrictions on Molesworth Street. Cornwall Council has requested a better map and suggested changes to the policy title and wording, to make it clearer and more relevant, which are worthy of consideration.

### *Policy TR04 Trevilling Quay*

The Trevilling Quay draft policy attracted a considerable community reaction. Some 26 comments from community sources have been submitted, of which only 15% can be categorised as opposing the purpose of the policy i.e. to facilitate a mixed-use redevelopment of the quay area. There is significant community support in principle, but many of the community respondents have expressed concern about either the quality or impact of the redevelopment on this key location site. There is little disagreement about the need for the development to protect and improve public access to the riverside and restrict the amount of residential development. Developer's representatives however have questioned whether a mixed-use development is deliverable, without a high number of dwellings being part of the overall development of the area. Developers have also raised concerns about the impact of any redevelopment on infrastructure and the environment.

The Environment Agency says the policy does not pay enough heed to flood risk and its mitigation. Cornwall Council considers there are several ambiguities within the policy criteria. Based on these two significant representations, there is a need to review the scope and content of the policy. Such a review should result in a policy that establishes an appropriate framework for a master-plan approach to redevelopment of the area.

### *Housing - General*

Two of the four comments received from community sources are outside the scope of a neighbourhood plan. Cornwall Council points out that the order of topics in the Wadebridge Area NP is not the conventional order used by many NPs. This may not be a problem, but it should be considered once the policies have been re-drafted or re-affirmed.

### *Policy HS01 Meeting Local Housing Need*

There is little objection or criticism of policy HS01 that seeks to ensure that new housing development addresses local housing needs in the right way. Most of the comments received are from community-based sources. Several call for as many small units as possible, recognising that young people and the elderly within the community are relatively ill-served by the current housing market. What is meant by affordability is an issue for some. The Fire Service has referred to a report that includes sound recommendations relating to housing for the elderly and disabled. What has been suggested is beyond the scope of the NP but could be referenced as a source of advice.

There seems little reason to change the policy, but it should be reviewed in the light of additional evidence and community feedback. The supporting statement may benefit from references to what the community has said in the most recent consultation and from extended reference as to how the NP policy links to relevant LP policies.

### *Policy HS02 Retaining Affordable Housing Stock*

The only objection to the policy comes from the representative of one developer. Cornwall Council does not raise any concerns about the policy as it is written. There seems insufficient reason to change the policy.

### *Policy HS03 Infill Housing*

Community respondents, though few, are generally happy with policy HS03 as drafted. Contributions have been received from the representative of a developer, that suggests the policy is simply a reiteration of

part of the Local Plan; and Cornwall Council, which suggests one of the criteria is amended as a sub-clause is unnecessary. A simple alteration to the policy may be appropriate.

#### *Policy HS04 Innovative Housing Solutions*

Community response to the policy is very limited but favourable. A single response from the representative of a developer also expresses support for the policy. Cornwall Council has sought clarity on the scope of the policy and offered to help with its re-drafting to ensure it is fit for purpose.

#### *Policy HS05 Self Build Dwellings*

The community response, which is generally supportive, has been complicated by a map at an exhibition, indicating 'site 16' as being a potential self-build site (which is not a NP proposal). One representative of a developer has also expressed support for the policy, in the interests of increasing choice and overall housing delivery. Cornwall Council is supportive of the policy but has raised a couple of queries relating to definitions and explanations, which it should be able to provide help resolving as it was instrumental in writing the policy in its present form.

#### *Policy HS06 Layout and Design*

Community response to the policy is very limited but favourable. Only one developer commented on the draft policy by suggesting that it had little practical application. The LPA has not raised any concern about the policy, although it would like to see it re-phrased to be more reasonable and flexible.

#### *Policy HS07 District Heating Schemes*

Two suggestions have been received from community sources to extend the policy for district heating schemes to include reference to examples of renewable energy sources other than just biomass. The implication of including the wider "*and low carbon heating strategies*" phrase needs to be considered. Two other respondents have pointed out a typographical and a potential punctuation error.

#### *Natural Resources and Energy - General*

The policies under this topic heading, attracted few comments and very little criticism. It can only be concluded that, as regards renewable energy use and development, the contents of the Pre-Submission Neighbourhood Plan satisfactorily reflect the views and aspirations of the local community.

#### *Policy RE01 Micro Energy Generation*

There are no specific comments received on either the policy or the supporting statement.

#### *Policy RE02 Solar Arrays*

Community response to the policy is very limited but favourable. No contributions have been received from the organisational and business respondents.

#### *Policy RE03 Wind Turbines*

Community response to the policy is very limited. One respondent was wholly in support of the policy approach proposed; the other was against, on the basis that they are opposed to all wind turbines. On the basis of a very small sample, it would be wrong to conclude that community opinion is divided. As only one person has objected to the policy it would be more appropriate to conclude that the community does not object to the policy as it is written.

#### *Policy RE04 Visual Impact of Wind Turbines*

There are no specific comments received on either the policy or the supporting statement.

#### *Policy RE05 Community Energy Projects*

Community response to the policy is very limited but favourable. No contributions have been received from the organisational and business respondents.

#### *Transport and Traffic - General*

We are informed that for too long Wadebridge has been a town with traffic problems. The by-pass may have removed much of the area's through-traffic, but the scale of local traffic has continued to grow, and

certain parts of the town's network are congested on an almost daily basis. There is little dispute about where the hotspots are. Concern has been expressed that new development will add to the problem rather than help solve it and most importantly, there is a fear that the extent of the problem will not be fully recognised or addressed.

#### *Policy TT01 Impact of Traffic*

Community response to this policy is either one of support or nominating additional hotspots to be referred to. The two developers that have responded both question the fairness of the policy as written, either because the evidence for the extensive list of roads is not apparent in the Plan and its associated documents, or because the policy requires a transport assessment that may extend beyond what is reasonable for a specific planning application. Cornwall Council has no issue with the policy, but it would seem fair to review the policy in the light of the representations to ensure it achieves what is expected of it.

#### *Policy TT02 Town Centre Parking*

Three community comments only have been received. All are aimed at supporting the intention of the policy. The LPA too supports the policy and helpfully points out a couple omissions and errors in the supporting text.

#### *Policy TT03 Safe Cycle and Pedestrian Links*

Four community comments only have been received. All are in favour of measures to improve the safety of the cyclist and pedestrian. The LPA too supports the policy.

#### *Policy TT05 Local Shopping*

There were no community submissions regarding this policy. Only Cornwall Council has offered observations, which include a suggested policy amendment to ponder.

#### *Policy TT06 Pedestrian and Cycle Priority in Town Centre*

It seems that the community is content with the policy and its intentions although there are aspects of the network in the town centre that need attention to minimise conflicts and improve safety. The comments and suggestions received should be referred to the appropriate bodies.

Cornwall Council has offered observations, which include policy amendments to ponder.

#### *Arts and Culture - General*

Two comments suggest that the topic introduction may usefully be up-dated.

#### *Policy AC01 Art in the Public Realm*

Community response to the policy is very limited but favourable. Of the organisations and businesses that responded to the Plan only Cornwall Council offered thoughts on this policy.

#### *Policy AC02 Centre for Arts and Cultural Activity*

Community response to the policy is very limited but favourable. No contributions have been received from other organisational and business respondents.

#### *Sport and Recreation - General*

The three community comments all make a similar point regarding the River Camel. Its potential as a recreation resource, they allege, is understated in the introductory section of the 'Sport and Recreation' section of the Plan. Cornwall Council has provided a useful up-date on its intention to prepare an open space SPD.

#### *Policy SR01 Protecting Sports Pitches and Recreational Fields*

Community response to the policy is very limited but favourable. No contributions have been received from organisational and business respondents.

#### *Policy SR02 Promoting Tourism*

Only two comments were received. The single community respondent expresses disappointment that the policy is rather vague and would like to see it be more specific about the acceptable costs of and desired benefits from tourism development. Cornwall Council merely suggests a minor amendment to the policy wording.

#### *Policy SR03 New Recreation Facilities*

Community response to the policy is very limited but favourable. The Environment Agency is keen to ensure the location of an important storage pond is recognised and referred to.

#### *Policy SR04 Sports Facilities*

Community response to the policy is very limited but favourable. Of the organisations and businesses that responded to the Plan, only Cornwall Council has offered thoughts on this policy.

#### *Policy SR06 Local Footpaths*

Community response to the policy is very limited but favourable. One comment has been received from community sources. It expresses support for the policy. Cornwall Council too appears in support of the policy. It also points out that the policy may be mis-numbered.

#### *Policy SR07 Recreation and Tourism*

There were no specific comments received on either the policy or the supporting statement

#### *Community and Infrastructure - General*

The three anonymous community consultees echo a general concern, that is reflected in the number of policy-specific comments relating to the inadequacy of aspects of local infrastructure to cope with the proposed level of growth over the plan-period. Three community-based organisations make points that relate specifically to their 'business', which may require minor changes to the supporting text. Cornwall Council has added some useful advice and offered to work with the three councils on ensuring that greatest benefit is derived from the CIL.

#### *Policy CI01 Infrastructure Requirements*

The several community respondents that have made comment about this policy do not appear to criticise the policy per-se. The points made emphasise the concerns that the respondents and others have about the capacity of the local infrastructure to cope with a major increase in demand. The schools and health facilities are the most oft mentioned aspects that are thought to be already operating close to capacity. The capacity of the local road network and the lack of work opportunities are also cited.

One developer challenges the need, justification and fairness of such a policy. Cornwall Council raises no objection to the policy.

#### *Policy CI02 Community Facilities*

No community comments were received about this policy. NHS Property Services provides the main point of consideration. It objects to any of its property holding being regarded as a community asset, at least in policy terms. It does not want a neighbourhood plan policy restricting its ability to dispose of redundant property and realise best value for the long-term benefit of health service delivery.

Cornwall Council asks that the Neighbourhood Plan uses the same definition of community facilities as the Local Plan, which states that *"the definition of community facilities is wide ranging and includes public services, community centres and public halls, arts and cultural facilities, policing, fire and ambulance services, health and education facilities, public houses, public toilets, youth centres, nurseries, libraries, leisure centres, allotments, playing fields, social care facilities including day centres, places of worship and services provided by the community and voluntary sector"*. In reviewing the definition of the community facilities that are covered by the Plan, the status of local health facilities should be considered, in the light of the response from the NHS Property Services and made plain in the Plan.

## Wadebridge Area Neighbourhood Plan

### Analysis of Regulation 14 Responses

On the following pages, is presented a summary of all comments submitted under the relevant topic and policy heading, together with observations and recommendations. Where there seems to be unanimity, or close to it, amongst the unattributed comments (identified as “name withheld”) I have taken this to represent the expressed view of the community.

It should be noted that throughout the analysis that follows, reference to the Plan, means the Pre-Submission Version of the Wadebridge Area Neighbourhood Plan<sup>8</sup> that was made available on the website for comment in accordance with Regulation 14.

#### General Comments on Plan

Just over 60% of 26 general observations on the Plan are simple and straightforward unqualified statements of support. Eight submissions express disapproval of the Plan. In most of these cases, the respondent is opposed to the scale of growth that the Plan has had to accede because of the target set by the Cornwall Local Plan.

No.	From:	Summary of Comment	Planning reasons and other relevant comments (consultant's interpretation)	Consultant's Suggestions
12	Name withheld	<i>Support for the Plan</i>	Support noted	No change required
19	Name withheld	<i>Opposed to growth because of impact on traffic and lack of employment</i>	Objects to expansion and the loss of green fields. The former is contrary to the Local Plan, the latter is difficult to avoid if the LP targets are to be accommodated	Consider impact on greenfield sites as part of a review of the SD policies
44	Name withheld	<i>Agree with topics and policies</i>	Support noted and plea that the impact of the Plan is monitored	Ensure there is a suitable statement on monitoring in the Plan
45	Name withheld	<i>Excellent document</i>	Complement noted	No change required
55	Name withheld	<i>Concern that plan does not deal with need for single person dwellings</i>	Calls for a balanced development strategy	Address the need for small dwellings and more local jobs in the Plan
59	Name withheld	<i>Not happy with growth but accept it – would like to see flood risk highlighted</i>	Expresses preference for infill and highlights concerns about flood risk as a result of major development	Consider whether flood risk is adequately dealt with in the Plan
62	Name withheld	<i>Opposes growth</i>	Critical of LP target and potential adverse impact on Wadebridge	Note concerns - ensure Plan promotes the right type of development at the right time
63	Name withheld	<i>Opposes growth – capacity of infrastructure</i>	Wishes to ‘stop’ further growth despite Govt policy being clear that NPs cannot be used to stop growth and that there is a presumption in favour of sustainable development	Emphasise local concerns about infrastructure capacity in the Plan
67	Name withheld	<i>Supports the Plan – highlights need for infrastructure</i>	Fears that community infrastructure is inadequate to cope with growth	Emphasise local concerns about infrastructure capacity in the Plan

<sup>8</sup> <https://www.wadebridge-tc.gov.uk/images/Egloshayle-St-Breock-Wadebridge-Neighbourhood-Plan-Pre-Submission-Version.pdf>

72	Name withheld	<i>Wadebridge is being spoilt by too much development</i>	States that the town has changed because of growth fears it will continue to do so – also has infrastructure capacity concerns	Ensure the Plan addresses the matter of impact of development on the character of the town and its services
81	Name withheld	<i>Supports Plan particularly the relief road to Rock</i>	Support noted	No change required
82	Name withheld	<i>Supports Plan because I hope it brings affordable housing for young people</i>	Young person calling for sufficient affordable housing for the young	Ensure Plan recognises housing needs of young people
83	Name withheld	<i>Supports the Plan</i>	Support noted	No change required
138	Name withheld	<i>Full support Neighbourhood Plan</i>	Support noted	No change required
156	Name withheld	<i>Supports Plan</i>	Support noted	No change required
157	Name withheld	<i>Supports Plan</i>	Support noted	No change required
180	Name withheld	<i>Supports Plan – concern about community infrastructure</i>	Fears that community infrastructure is inadequate to cope with growth	Emphasise local concerns about infrastructure capacity in the Plan
182	Name withheld	<i>Supports Plan</i>	Support noted	No change required
212	Name withheld	<i>Support in principle for development direction with observations</i>	Supports the Plan and its acceptance of growth to meet the LP target (but no more) Believes the LP target should be regarded as a maximum (which it can't)	Ensure growth target is suitably restricted
218	Name withheld	<i>Support for the Plan</i>	Support noted	No change required
225	Name withheld	<i>Concern about growth on infrastructure, character and sustainability</i>	Questions the scale of growth on the basis that identified local housing is far less Sceptical about beneficial impact on environment, local economy and infrastructure	Ensure the Plan addresses the matter of impact of development on the character of the town and its services
231	Name withheld	<i>Support for the Plan</i>	Support noted	No change required
250	Name withheld	<i>Supports Plan</i>	Support noted	No change required
253	Name withheld	<i>Objects to Plan on basis that previous consultation was not properly taken into account</i>	Re-submits most comments received in Feb 2017 during the informal consultation on the 1 <sup>st</sup> Version of the Plan. Claims that the SG ignored the last public consultation response and suggests that they are taken into account during this current period of Plan review	The SG received details and analysis of all the comments received during the 2017 consultation on a 1 <sup>st</sup> version of the Plan. There is a need to ensure that the Consultation Statement provides sufficient evidence and explanation of how the various consultation were conducted and the responses analysed and used to influence the Plan's development
170	Environment Agency	<i>The Neighbourhood Plan does not formally recognise the vulnerability of the land adjacent to the River Camel to flooding. There is no specific mention of flood risk or the defences, and the policies don't highlight this needs to be considered. While the Neighbourhood Plan positively identifies housing site outside of the flood</i>	Makes strong point about flood risk and the vulnerability of land adjacent to the river Camel Emphasises the need to recognise the flood risk issue in the NP Provides a useful evidence source document (that has	The Plan must make plain that the growing flood risk as a result of continued climate change is recognised, and the impact of new development has been be taken fully into account



		<p><i>risk areas, the town centre that supports the community is at risk.</i></p> <p><i>It is important that the flood risk is recognised in the Neighbourhood Plan, as the long-term approach to living with this risk influences the type of development that is appropriate.</i></p> <p><i>Without a long-term flood risk management strategy in place there cannot be an expectation that the defences will be upgraded in the future. This can lead to a requirement for raised floor levels, emergency access or changes to land use. Examples in Wadebridge of different approaches include the raised McCarthy and Stone housing at the former Cattle Market, Bradford Quay with raised residential over ground floor parking, and commercial properties along Eddystone Road which would be subject to ground floor flooding.</i></p> <p><i>I attach a preliminary document that was drafted in 2012 setting the flood risk scene for Wadebridge. This was intended to explore the issues so that the community could help develop the long-term strategy, which would align with the Plan.</i></p>	not been revealed previously)	Consider the implications of the draft document provided by EA on policy content and supporting evidence
221	Environment Agency	<p><i>We support the aims and intentions of the Plan and welcome the opportunity to comment.</i></p> <p><i>The evidence base for the Wadebridge area identifies that climate change could present a threat to the towns future. Investment in flood resilience infrastructure will be required. Whether or not the NP tackles this issue is a matter for those developing the plan. However, it remains an issue that the plan should acknowledge as it will have ramifications for the town and its inhabitants. We would recommend setting out the issue of climate change and resilience and consider address it within the plan. We are happy to meet to discuss the matter in person.</i></p>	Makes the point that the issue of climate change and its potential threat to the town is an issue that has not been highlighted	Consider including suitable context reference after discussions with EA as they have offered

No.	From:	Summary of Comment	Planning reasons and other relevant comments (consultant's interpretation)	Consultant's Suggestions
48	Name withheld	<i>Observations on area description</i>	The respondent extrapolates numbers in Section 2 to question whether the area can cope with a large increase in population and human activity Objects to further growth, which could spoil the town	Ensure it is clear that the Plan addresses the matter of impact of development on the character of the town and its services
209	Name withheld	<i>Observations on planning issues in neighbourhood area</i>	Summarises and concurs with the 'local' planning issues being addressed by the Plan	Note agreement for the general approach being taken by the Plan
222	Cornwall Council	<i>End of 1.1 amend to... Wadebridge Neighbourhood Plan Area (see Map A).</i>	Suggests the it would be clearer with the word Plan inserted	Accept the suggested amendment
222	Cornwall Council	<i>1.2 – remove comma after neighbourhood</i>	Suggests that a comma is unnecessary	Accept the suggested amendment
222	Cornwall Council	<i>For good practice, consistency in terms should be checked. For instance, on page 5 there is reference to 'Wadebridge Neighbourhood Area' (1.1); 'Wadebridge Area' (1.2); 'The Plan Area' (subheading) and, 'Neighbourhood Plan Area' (Map A). Similarly, 'the Neighbourhood Plan' (1.1); 'The Wadebridge Area Neighbourhood Plan' (1.3); 'the Plan' (4.1); and 'Egloshayle, St Breock and Wadebridge NP' (Maps A and B).</i>	Suggests that use of terms relating to the whole area lacks consistency	Decide on the title of the Plan Area and use throughout  Establish protocol and make alterations in the interests of clarity and consistency
222	Cornwall Council	<i>Map A – the boundary around the three parishes should be better presented, maybe by enhancing the boundary by putting it in a different colour.</i>	Suggests that the map could be made clearer by use of two colours	Consider changing maps in the interest of ease of understanding
222	Cornwall Council	<i>It's noted that the data will be updated. When the submission version is finalised don't forget to ensure dates are attached to all statistics (currently not all statistics are dated).</i>	Reminder to up-date data if it is to be included in the submission version and attach dates to statistics wherever possible	Consider whether the statistical summary is necessary and up-date as much as possible
222	Cornwall Council	<i>Footnote 2 – what is WANP the abbreviation for? Where is this document available (include a link)?</i>	Has not understood that WANP means Wadebridge Area Neighbourhood Plan Suggests adding weblink to footnote	Add a weblink to the footnote and ensure other necessary weblinks are in place and working
222	Cornwall Council	<i>3.1 – refer to where additional information around this work/the Consultation Statement can be found (you've followed good practice by only including the summary/conclusions of the community engagement, but what's missing is this reference to where this further evidence can be found).</i>	Would like the paragraph, or close-by, to include references to consultation reports	Probably best presented all together in the Consultation Statement which can be linked to in the submission Version of the Plan You could also include a reference and link to the website where the story can be found in a logical order.

222	Cornwall Council	<i>4.2 – good practice to use plain English and so recommend rewording with regard to ‘cognisant’.</i>	Suggests use of an easier to comprehend word	Perhaps use ‘mindful’ or ‘aware’
222	Cornwall Council	<i>4.3-4.4 – it is good that this work has informed the process and is referred to. A signpost to where this area of your evidence base can be accessed should be added.</i>	Suggests a weblink to the town framework exercise is included	Add a weblink to the footnote
222	Cornwall Council	<i>4.9 – suggest you amend (for the submission version) to say ‘.....Local Plan is set out in an accompanying Basic Conditions Statement that is available at XXXXX’ (insert link).</i>	Suggests that the paragraph is revised for the Submission Version	The paragraph must be revised and up-dated for the Submission Version
222	Cornwall Council	<i>Good practice to add quotation marks around the relevant text in the inset box.</i>	Suggests adding quotation marks to Local plan policy in text box to indicate it repeats what’s set out in the Local Plan	The text box was used to indicate it was an exact transcription – consider if quote marks help ensure the reader understands it is a direct copy from the LP
222	Cornwall Council	<i>4.10 - delete ‘supplementary’ and bring (DPD) to first occurrence of Development Plan Document (on first line), using abbreviation thereafter. At last sentence, alter ‘allocating’ to ‘allocates’.</i>	Suggest amending the paragraph for accuracy reasons	Accept suggestion and make minor amendments as suggested
222	Cornwall Council	<i>4.11 – check/update at next review, to quote what the latest version of the Site Allocations DPD says.</i>	Suggests that the Site Allocations DPD status may need up-dating in the submission version	Review para. and the need to up-date at the time of revising the Plan document
222	Cornwall Council	<i>4.15 refers to Goven side of the river – consider including a map identifying key locations/features mentioned</i>	Would like to see map to show key locations mentioned in this section and other parts of the Plan (especially where these are likely to be key to understanding and interpretation of policies)	Such a map may help document users’ understanding and interpretation
222	Cornwall Council	<i>5.6 – if there are any other associated evidence base documents, it would be good to also signpost these.</i>	Suggests it would be helpful to include weblinks to relevant documents	Probably simplest to add explanation, reference and link to the website where the story can be found in a logical order.
222	Cornwall Council	<i>5.8 - Alter ‘The Neighbourhood Plan, once ‘made’, will be a statutory development plan.’ to ‘The Neighbourhood Plan forms part of the Development Plan for the area’; and delete ‘(also a statutory development plan)’.</i>	Suggests re-wording in the interests of accuracy	Revise para. 5.8 in line with the suggestion
222	Cornwall Council	<i>6.9 – Can you add any conclusions from the SEA and also a link to where this can be accessed?</i>	Suggests adding conclusions from the SEA and also a weblink	It is common practice to do as suggested

### Summary Conclusion

Aside from a list of suggested corrections and amendments from the LPA, only two comments were received that are directed towards the introductory and scene-setting sections of the Pre-Submission Version of the Plan. The comments and suggestions received should be considered when the introductory sections are up-dated, which will be necessary given the time that has passed since it was drafted.

## Section 9 Sustainable Development

### General

There are 105 comments made under the sustainable development heading that are general in nature not be assigned to a specific policy for analysis purposes. The nature of these general comments is as follows:

Unqualified support	3
Positive reaction with explanation	36
Negative reaction with explanation	26
Opposition with no explanation	0
Additional development area(s) suggested	3
Other - Wellington Place	34 for + 3 against

Thirty-one submissions were received with the exact same format and content. They all advocated 'land east of 34 Wellington Place' being *"included in the Neighbourhood Plan"* and are accompanied by an aerial photograph of the site. The site in question was the subject of an unsuccessful outline planning application for three detached dwellings in February 2018. The main reason for its refusal by the local planning authority was stated as follows: *"whilst the proposal would provide three dwellings in a sustainable location that contribute to the housing targets of Wadebridge, it would extend development and the built form of the settlement into the open countryside and in so doing harm the character, appearance and integrity of this verdant river valley. The proposal conflicts with the development plan policies that seek to protect the countryside, as well as the spatial strategy pursued by this council for the location of housing."* The case made by all thirty-one submissions is that support should be given *"to local people who may propose to develop their own piece of land"*.

In the analysis table that follows, several respondents make reference to sites in and around Wadebridge by their number. A map showing all sites and areas of land that were part of the land supply and developability assessment was put on display at the consultation events at Wadebridge Town Hall<sup>9</sup>. Its prominence has resulted in several respondents commenting on the development merits or otherwise to sites shown on the map, whether they feature in the Pre-submission Version of the Plan or not. The map assigned a number to each of the parcels of land. For ease of understanding, the sites referred to in the comments below are as follows:

1	Gonvena land	23	Land south of Mowhay Meadow
3	Bodieve Park (football club)	24	Land between Wadebridge By-Pass and Bodieve Hamlet
4	Land adjacent to Trenant Industrial Estate	25	Land off Ball Roundabout
10	Trevorder Land	26	Land by Allotments
11	Land to rear of dwellings off Guineaport Road	28	Land north of Trevarner Farm
16	Land below War Memorial	29	Land north of Trevarner Farm
17	Land at Dunveth	30	Bodieve north of B3314
22	Land to south of Culvery and Meadowhead	31	Higher Bodieve

The allocation of land that is suitable and sufficient in scale for development to meet the targets of Local Plan, is a matter that has caused much debate and significant diversity of opinion within the communities of the neighbourhood area. This is reflected in the many and varied comments below that have been made in response to the general approach of Section 9 of the Pre-submission Version of the Plan to future development and growth, and the more specific comments that have been made on policies SD01, SD03 and SD04.

There is little doubting that the matter has been stoked, during the consultation period, by the campaigning activity of parties that have an interest in specific sites and/or outcomes. This has resulted in an interesting array of comments, which taken together, present competing arguments and expose

<sup>9</sup> A full version of the map can be found in the 'Objective (Technical) Review of Land Supply for Housing and Employment'  
[http://www.wadebridge-tc.gov.uk/images/council\\_pdfs/\\_NHP\\_Documents/WANP\\_Wadebridge\\_Area\\_Land\\_Supply\\_Assessment-Technical\\_Report.pdf](http://www.wadebridge-tc.gov.uk/images/council_pdfs/_NHP_Documents/WANP_Wadebridge_Area_Land_Supply_Assessment-Technical_Report.pdf)

divisions of opinion that may not be easy to reconcile to the satisfaction of the community at large within the Neighbourhood Plan. A failure to do so, may have profound implications for the Referendum.

No.	From:	Summary of Comment	Planning reasons and other relevant comments (consultant's interpretation)	Consultant's Suggestions
1	Name withheld	<i>Nominates land on Wellington Place on for housing development (encl. photo)</i>	Land in question is a greenfield site outside of the proposed BUAB. No planning reasons offered for why the site should be allocated in the NP	The merits or otherwise of the site could be reviewed as part of the overall review of the development and growth strategy. The NPPF now says (in para. 69) that NPs should consider sites of under 1ha for allocation in a NP. So, if the landowner were to submit interest in it being developed, there is a case for looking at the site as the SG considers what the Plan does in terms of sites. Equally though, policies relating to the BUAB policy and its edge, should be able to deal with small sites like this. Its planning history will be pertinent.
2	Name withheld	<i>Nominates land on Wellington Place on for housing development (encl. photo)</i>	Land in question is a greenfield site outside of the proposed BUAB. No planning reasons offered for why the site should be allocated in the NP	Same as 1 above
3	Name withheld	<i>Nominates land on Wellington Place on for housing development (encl. photo)</i>	Land in question is a greenfield site outside of the proposed BUAB. No planning reasons offered for why the site should be allocated in the NP	Same as 1 above
14	Name withheld	<i>Keep development within by-pass boundary</i>	Objects to building outside the by-pass – believes proposed site east of Bodieve extends too far north	The significance of the by-pass as a physical boundary should be taken fully into account whilst reviewing the overall growth strategy and the identification or allocation of areas for development
15	Name withheld	<i>Concern about impact of any development on Wadebridge Com'</i>	Approves Plan and growth strategy. Does express concern that relocating the football ground next to the comprehensive school would constrain any expansion plans of the school	No change required
18	Name withheld	<i>Plan should consider flood risk – no to development at Gonvena</i>	Says Plan should ensure that flood risk is considered properly	The Plan must make plain that the growing flood risk as a result of

			Does not support development near Gonvena House – no reasons given	continued climate change is recognised, and the impact of new development has been be taken fully into account
21	Name withheld	<i>Concern about development of detached houses affecting Crewden</i>	Responds to campaign to allocate at Wellington Place – does not agree because of loss of land rich in wildlife and natural drainage area	When reviewing the growth and development strategy recognise that there is local objection to the site at Wellington Place being developed
22	Name withheld	<i>Opposes development of land at Wellington Place</i>	Responds to campaign to allocate at Wellington Place – does not agree because of loss of land rich in wildlife and natural drainage area	Same as 21 above
23	Name withheld	<i>Opposes development of land at Wellington Place</i>	Registers opposition to the allocation of a site for housing that is not allocated in the Plan because of loss of countryside and threat to wildlife	Same as 21 above
24	Name withheld	<i>Concern about impact of development outside by-pass on flood and traffic</i>	Fears that houses built outside of the by-pass would increase the flood risk in Egloshayle	Same as 18 above
33	Name withheld	<i>Oppose development at top of Foxdown</i>	Objects to Higher Trentant development despite the outline planning consent. Believes that consent on reserved matters should ensure that further traffic problems within the area are mitigated	When reviewing the growth and development strategy, recognise that some people have concerns about the negative impact of the development and ensure policies address these concerns as much as is possible
34	Name withheld	<i>Omission of Church Park is an oversight better site than land east of Bodieve</i>	Nominates Church Park as preferable to land east of Bodieve because of the huge disruption to traffic	When reviewing the growth and development strategy, reconsider the site and other sites nominated during the Reg. 14 process based on objective criteria and the evidence. The weight of public opinion should be taken into account but should not be the determining factor
38	Name withheld	<i>Nominates land on Wellington Place on for housing development (encl. photo)</i>	Land in question is a greenfield site outside of the proposed BUAB. No planning reasons offered for why the site should be allocated in the NP	Same as 1 above
39	Name withheld	<i>Opposes development of land at Wellington Place</i>	Responds to campaign to allocate at Wellington Place – does not agree because of over-looking of	Same as 21 above



			existing dwellings and harm to wildlife	
41	Name withheld	<i>Objects to development on sites 16 and 10</i>	Objects to any development proposal for land (site 16) not allocated in the Plan (covenant) Objects to Church Park 'new town' proposal	Recognise that there is concern locally about the possibility of sites not currently allocated in the plan being allocated for major development as a result of the Reg. 14 consultation
56	Name withheld	<i>Site 10 Trenorder should be on preferred list</i>	Believes Church Park would be a preferable solution because of capacity and proposed new community facilities	Same as 34 above
57	Name withheld	<i>Concern about Higher Trenant site being given permission</i>	Concerns about traffic problems that will emanate from Higher Trenant Considers proposed scale of growth will bring intolerable traffic and air quality problems	Same as 33 above
58	Name withheld	<i>Keep site 3 as recreation land and re-consider site 10</i>	Objects to any proposal to develop football ground particularly because of the traffic problems likely Advocates consideration of Church Park on a gradual development basis as it would provide new infrastructure Does not want development to take place near the by-pass to protect visual appearance of the town	Same as 34 above
61	Name withheld	<i>Do not support site 10 (disagree with leaflet from Progress Land)</i>	Registers opposition to the allocation of an area for housing that is not allocated in the Plan – does not believe that the health facilities will be realised	Same as 41 above
66	Name withheld	<i>Concern about the impact of Development on Egloshayle</i>	Suggests growth on the scale propose will spoil the town and deter tourist/visitors and worsen traffic problems Considers Church Park may have some merit as an alternative	Same as 34 above
74	Name withheld	<i>Object to moving football club</i>	Objects to any development proposal that would result in the football club having to move	Same as 41 above
78	Name withheld	<i>Broadly agree – keep Gonvena as it is</i>	Agrees with propose strategy in Plan because it protects the fields in front of Gonvena House and the primary should fields	Concurs with sites selected for development No changes required to the Reg. 14 version of the Plan

86	Name withheld	<i>Questions scale of growth and states need for dwellings for single occupancy</i>	Does not support proposed scale of growth – says population projections don't justify it Sees a clear need for more 1 and 2 bed dwellings	Note opposition to the strategic scale of growth required –but no change required to Plan
87	Name withheld	<i>Supports policies</i>	Support noted	No change required
90	Name withheld	<i>Objects to development of sites 1,4,11,24,26,28,29,10,22,23,17</i>	Objects to land outside of the by-pass and to the south west being developed – states that some will undermine flood defences and the sewage system cannot cope	Same as 14 above
92	Name withheld	<i>Site 16 unsuitable for development</i>	Objects to any development proposal for land (site 16) not allocated in the Plan – opposes loss of agricultural land	Same as 41 above
93	Name withheld	<i>Opposed to Church Park</i>	Registers opposition to the allocation of a site for housing that is not allocated in the Plan	Same as 41 above
98	Name withheld	<i>Opposes football club moving</i>	Opposes development on the football club site Supports development on land east of Bodieve	Same as 78 above
99	Name withheld	<i>Pleased to see Gonvena Fields protected, the Football club should not move</i>	Opposes development on Gonvena Field and the football club site Supports development on land east of Bodieve	Same as 78 above
100	Name withheld	<i>Oppose development above Trevilling Road</i>	Opposes development on Gonvena Would support plan to build at Church Park Concerned that development near Ball roundabout would cause major traffic congestion	Same as 78 above
104	Name withheld	<i>Supports Sladesbridge and land on Wellington Place for housing development</i>	Advocates alternative sites being allocated for housing in the NP rather than those in the Plan. States that land east of Bodieve would take the best agricultural land and require major highway modifications Claims that the community support is strongest for Church Park	Same as 34 above
111	Name withheld	<i>General supportive of the policy approach to accommodating growth</i>	Pleased that land at Gonvena has been ruled out because of the loss of 'green land' Supports policies in the Plan as an alternative	Same as 78 above
113	Name withheld	<i>Nominates land on Wellington Place on for housing development (encl. photo)</i>	Land in question is a greenfield site outside of the proposed BUAB. No planning reasons offered for why the site should be allocated in the NP	Same as 1 above

114	Name withheld	<i>Nominates land on Wellington Place on for housing development (encl. photo)</i>	Land in question is a greenfield site outside of the proposed BUAB. No planning reasons offered for why the site should be allocated in the NP	Same as 1 above
115	Name withheld	<i>Nominates land on Wellington Place on for housing development (encl. photo)</i>	Land in question is a greenfield site outside of the proposed BUAB. No planning reasons offered for why the site should be allocated in the NP	Same as 1 above
116	Name withheld	<i>Nominates land on Wellington Place on for housing development (encl. photo)</i>	Land in question is a greenfield site outside of the proposed BUAB. No planning reasons offered for why the site should be allocated in the NP	Same as 1 above
117	Name withheld	<i>Nominates land on Wellington Place on for housing development (encl. photo)</i>	Land in question is a greenfield site outside of the proposed BUAB. No planning reasons offered for why the site should be allocated in the NP	Same as 1 above
118	Name withheld	<i>Nominates land on Wellington Place on for housing development (encl. photo)</i>	Land in question is a greenfield site outside of the proposed BUAB. No planning reasons offered for why the site should be allocated in the NP	Same as 1 above
119	Name withheld	<i>Nominates land on Wellington Place on for housing development (encl. photo)</i>	Land in question is a greenfield site outside of the proposed BUAB. No planning reasons offered for why the site should be allocated in the NP	Same as 1 above
120	Name withheld	<i>Nominates land on Wellington Place on for housing development (encl. photo)</i>	Land in question is a greenfield site outside of the proposed BUAB. No planning reasons offered for why the site should be allocated in the NP	Same as 1 above
121	Name withheld	<i>Nominates land on Wellington Place on for housing development (encl. photo)</i>	Land in question is a greenfield site outside of the proposed BUAB. No planning reasons offered for why the site should be allocated in the NP	Same as 1 above
122	Name withheld	<i>Nominates land on Wellington Place on for housing development (encl. photo)</i>	Land in question is a greenfield site outside of the proposed BUAB. No planning reasons offered for why the site should be allocated in the NP	Same as 1 above
123	Name withheld	<i>Nominates land on Wellington Place on for housing development (encl. photo)</i>	Land in question is a greenfield site outside of the proposed BUAB. No planning reasons offered for why the site should be allocated in the NP	Same as 1 above
124	Name withheld	<i>Nominates land on Wellington Place on for housing development (encl. photo)</i>	Land in question is a greenfield site outside of the proposed BUAB. No planning reasons offered	Same as 1 above

			for why the site should be allocated in the NP	
125	Name withheld	<i>Nominates land on Wellington Place on for housing development (encl. photo)</i>	Land in question is a greenfield site outside of the proposed BUAB. No planning reasons offered for why the site should be allocated in the NP	Same as 1 above
126	Name withheld	<i>Nominates land on Wellington Place on for housing development (encl. photo)</i>	Land in question is a greenfield site outside of the proposed BUAB. No planning reasons offered for why the site should be allocated in the NP	Same as 1 above
127	Name withheld	<i>Nominates land on Wellington Place on for housing development (encl. photo)</i>	Land in question is a greenfield site outside of the proposed BUAB. No planning reasons offered for why the site should be allocated in the NP	Same as 1 above
128	Name withheld	<i>Nominates land on Wellington Place on for housing development (encl. photo)</i>	Land in question is a greenfield site outside of the proposed BUAB. No planning reasons offered for why the site should be allocated in the NP	Same as 1 above
129	Name withheld	<i>Nominates land on Wellington Place on for housing development (encl. photo)</i>	Land in question is a greenfield site outside of the proposed BUAB. No planning reasons offered for why the site should be allocated in the NP	Same as 1 above
130	Name withheld	<i>Supports land on Wellington Place for housing development</i>	Supports allocation of housing on a greenfield site outside of the proposed BUAB. No planning reasons given	Same as 34 above
131	Name withheld	<i>Nominates land on Wellington Place on for housing development (encl. photo)</i>	Land in question is a greenfield site outside of the proposed BUAB. No planning reasons offered for why the site should be allocated in the NP	Same as 1 above
132	Name withheld	<i>Nominates land on Wellington Place on for housing development (encl. photo)</i>	Land in question is a greenfield site outside of the proposed BUAB. No planning reasons offered for why the site should be allocated in the NP	Same as 1 above
133	Name withheld	<i>Nominates land on Wellington Place on for housing development (encl. photo)</i>	Land in question is a greenfield site outside of the proposed BUAB. No planning reasons offered for why the site should be allocated in the NP	Same as 1 above
134	Name withheld	<i>Nominates land on Wellington Place on for housing development (encl. photo)</i>	Land in question is a greenfield site outside of the proposed BUAB. No planning reasons offered for why the site should be allocated in the NP	Same as 1 above
135	Name withheld	<i>Nominates land on Wellington Place on for housing development (encl. photo)</i>	Land in question is a greenfield site outside of the proposed BUAB. No	Same as 1 above

			planning reasons offered for why the site should be allocated in the NP	
136	Name withheld	<i>Doesn't agree with site 3 football field being developed</i>	Objects to any development proposals for the football club	Same as 78 above
137	Name withheld	<i>Don't want building from Sladesbridge to Wadebridge</i>	Objects to growth closing the gap between Sladesbridge and Wadebridge	Same as 78 above
141	Name withheld	<i>Opposes development of site 26</i>	Objects to development taking place on a site not allocated in the Plan (allotments) because of loss of community benefit	Same as 78 above
142	Name withheld	<i>Protect site 26 allotments</i>	Objects to development taking place on a site not allocated in the Plan (allotments) because of loss of community benefit	Same as 78 above
145	Name withheld	<i>Nominates land on Wellington Place on for housing development (encl. photo)</i>	Land in question is a greenfield site outside of the proposed BUAB. No planning reasons offered for why the site should be allocated in the NP	Same as 1 above
146	Name withheld	<i>Nominates land on Wellington Place on for housing development (encl. photo)</i>	Land in question is a greenfield site outside of the proposed BUAB. No planning reasons offered for why the site should be allocated in the NP	Same as 1 above
147	Name withheld	<i>Advocating new town on the A30 concerned about building houses north of town</i>	Opposes the Church Park proposal and all major development at Wadebridge because of traffic issues, lack of employment and doubt that the dwellings will go to local people Opposes loss of good agricultural land	Same as 86 above
147A	Name withheld	<i>Concerned about the scale of development required by the Govt</i>	Opposes scale of growth and inevitable loss of good agricultural land	Same as 86 above
148	Name withheld	<i>Nominates land on Wellington Place on for housing development (encl. photo)</i>	Land in question is a greenfield site outside of the proposed BUAB. No planning reasons offered for why the site should be allocated in the NP	Same as 1 above
149	Name withheld	<i>Nominates land on Wellington Place on for housing development (encl. photo)</i>	Land in question is a greenfield site outside of the proposed BUAB. No planning reasons offered for why the site should be allocated in the NP	Same as 1 above
150	Name withheld	<i>Nominates land on Wellington Place on for housing development (encl. photo)</i>	Land in question is a greenfield site outside of the proposed BUAB. No planning reasons offered for why the site should be allocated in the NP	Same as 1 above

151	Name withheld	<i>Use land close to Tesco's for sensitive residential development</i>	Considers more development near the villages of St Breock and Polmorla would be preferable because of easy access into Wadebridge	Same as 34 above
162	Name withheld	<i>Consider drainage water run-off issues that could affect the Polmorla flood plain</i>	Draws attention to the possible drainage/run off issues which could affect the Polmorla flood plain	Same as 18 above
163	Name withheld	<i>Opposes development at Gonvena or on land that would add to traffic problems on Gonvena Hill</i>	Development on land east of Bodieve would cause major traffic problems on Gonvena Hill and into town Also opposed to loss of green fields at Gonvena	Take into account concerns about the harmful impact of the proposed major development sites on infrastructure
166	Name withheld	<i>Opposes development of site 16</i>	Concerned about land (site 16) that is not allocated in the Plan – being allocated	Same as 41 above
169	Name withheld	<i>Opposes development on Gonvena Fields and at the Football club</i>	Opposes any allocation on Gonvena fields because of harm to wildlife and loss of visually important area Objects to plans to move football club Considers Church Park would be the best solution – does not understand why it has been over-looked	Same as 34 above
171	Name withheld	<i>Supports land on Wellington Place for housing development</i>	Believes development at Wellington Place is infill and should be supported as the land is in local ownership	Same as 34 above
173	Name withheld	<i>Site 24 should be protected from development to protect Bodieve</i>	Says site 24 is an important buffer to ensure Bodieve remains a separate hamlet	Recognise concerns about the loss of identity of the hamlet of Bodieve
177	Name withheld	<i>Opposes land on Wellington Place for housing development</i>	Seeks to contradict recent unsolicited letter received and opposes development on land that is outside the BUAB, would reduce beauty of the area, damage the ecology, cause lack of privacy and not provide homes for local people	Same as 21 above
183	Name withheld	<i>Concerned about the level of housing growth and pressure on health services</i>	Opposed to growth Believes most homes will go to outsiders who (being more elderly) will put a strain on health services	Same as 86 above
185	Name withheld	<i>Development should be within the bypass and small-scale and gradual</i>	Would prefer all development to take place within the by-pass and provide a high proportion of affordable homes	Same as 14 above
189	Name withheld	<i>Favours areas selected for development pleased that Gonvena and Sladesbridge are not</i>	Supports Plan Does not support the loss of green areas such as Gonvena and Sladesbridge that provide an important setting for the town	Same as 78 above



191	Name withheld	<i>New development should not just be for affordable housing it must be mixed</i>	Wishes to see mixed developments Any revised traffic arrangements should not restrict access to B3314 for local residents of St Matthews Hill	Same as 163 above
191	Name withheld	<i>Large new developments will need amenities</i>	Says new developments should provide sufficient local amenities within the site	Same as 163 above
194	Name withheld	<i>Site 24 should not be developed, to protect Bodieve</i>	Says site 24 is an important buffer to ensure Bodieve remains a separate hamlet	Same as 173 above
199	Name withheld	<i>Objects to sites 10 and 16 being developed</i>	Objects to sites that are not allocated in the Plan being allocated Highlights need for small dwelling units for young people	Same as 41 above
204	Name withheld	<i>Opposes development on land to the north of Bodieve</i>	Opposes loss of agricultural land, fears major traffic problems Also opposes any form of ribbon development	Same as 163 above
205	Name withheld	<i>Opposes development on land east of Bodieve</i>	Opposes development near Bodieve because of visual impact on the town and loss of good agricultural land Believes Church Park would be better because good quality agricultural land will be important in future	Same as 34 above
207	Name withheld	<i>Opposes development on the football field</i>	Opposes development on the football field because of: construction noise to local property, increased air pollution, no flood risk assessment, adverse visual impact, poor highway design	The respondent seems to be commenting on a current planning application not the content of the NP, which does not allocate the football club for development (it protects it from development policy SR01)
208	Name withheld	<i>Presentation of policies was confusing and incomplete at the exhibition</i>	Respondent confused by exhibition Believes both land east of Bodieve and Church Park should be included, if development has to take place outside the by-pass	Same as 34 above
209	Name withheld	<i>Observations on post-2030 development</i>	Believes that development post-2030 may have to take place to the south and west therefore we need to plan for the provision of a new relief road now	Recognise that the Plan needs to appreciate the long-term prospects and implications
211	Name withheld	<i>Objections to Church Park being considered</i>	Registers opposition to the allocation of an area for housing that is not allocated in the Plan because it would not comply with several of the	Same as 41 above

			policies in the Pre-Submission NP i.e. SD02 (because of scale) SD05 (character), NE03 (landscape impact), TT01 (traffic), CI01 (infrastructure) as it does not support sustainable growth	
212	Name withheld	<i>Supports policies</i>	Support noted	No change required
227	Name withheld	<i>Opposed to growth and use of large building companies</i>	Opposes loss of green fields development should focus on brown-field sites, small developments and use of smaller contractors	Same as 86 above
229	Name withheld	<i>Opposed to growth – loss of countryside and impact on infrastructure</i>	Against major new development at Wadebridge because of loss of countryside	Same as 86 above
232	Name withheld	<i>Concerned about impact of growth - capacity of infrastructure and safety of road users</i>	Against rapid expansion of Wadebridge which could cause major infrastructure problems	Same as 86 above
233	Name withheld	<i>Concerned about impact of growth - capacity of infrastructure</i>	Considers scale of growth is completely inappropriate because of traffic, air quality, loss of green spaces and threat to character	Same as 86 above
238	Name withheld	<i>Opposes development at Church Park as this would create a separate village</i>	Registers opposition to the allocation of an area for housing that is not allocated in the Plan, it is a new village that should be sited elsewhere	Same as 41 above
239	Name withheld	<i>Concerned about impact of growth - capacity of services and traffic impact</i>	Cites capacity of health services and schools as reason to be concerned about the proposed scale of growth	Same as 163 above
241	Name withheld	<i>Support development if there are sufficient affordable dwellings and infrastructure</i>	Calls for many affordable houses to rent for local people	Appreciate the need to ensure there is a sufficient supply of affordable housing
245	Name withheld	<i>Traffic on Gonvena Hill must not increase – concern about infrastructure capacity</i>	Believes the impact of development on Gonvena hill should be the prime concern. Because of that advocates allocation of land opposite Showground, which is low grade agriculture land and already has some residential properties	Same as 163
249	Name withheld	<i>Proposes additional development site for inclusion in the Plan</i>	Proposes the inclusion of 4.6ha. of land at Pentire, Trevansen Road for allocation in the Plan (includes map and photographs)	Same as 34 above
255	Name withheld	<i>Suggests that land north of Trevanson Road should be considered for development</i>	Suggests that land at Pentire, Trevansen Road should be considered for allocation in the Plan	Same as 34 above

105	Situ8 for Merriman Ltd	<p><i>PPG (para. 42) confirms that an appraisal of options and an assessment of individual sites should be carried out against defined criteria and that: 'Proportionate, robust evidence should support the choices made and the approach taken. It is currently unclear whether such evidence has been produced to support several policies within the NP. Situ8 are concerned that the NP therefore fails to meet the basic conditions in this regard.</i></p> <p><i>In light of these issues, the deliverability of proposed allocations should be scrutinised and additional housing sites should be assessed and identified.</i></p> <p><i>The Plan does not comply with government guidance with respect to site allocations. The PPG states (ID: 41-042-20170728) that:</i></p> <p><i>"A qualifying body should carry out an appraisal of options and an assessment of individual sites against clearly identified criteria." This has not happened with the Neighbourhood Plan. Situ8 are concerned that the plan in its current form does not fully comply with basic condition (a) as the plan is considered not to follow national policy and guidance as the plan contains policies without the necessary proportionate, robust evidence to do so. The approach to development... does not provide the certainty and confidence that the supply of sites is available to deliver the number of dwellings stated within the NP.</i></p> <p><i>As a consequence, this raises concerns over the Plan's ability to meet the requirements of the NPPF and Situ8 are concerned that the Plan in its current form does not fully comply with basic condition (c) as the plan is unable to contribute towards meeting the needs of the area, by allocating sites which are achievable.</i></p> <p><i>Wadebridge is identified in Policy 3 of the Cornwall Local Plan as a main town. Policy 3 of Cornwall Local Plan Strategic Policies 2010 - 2030 highlights that new development will be managed through the Site Allocations Document or Neighbourhood Plans. Wadebridge is not included within the emerging Site Allocations Document and development will be managed through the NP.</i></p> <p><i>The planning process is therefore relying upon the NP to provide clarity on where and how the housing needs of the area will be met. The NP states there is a requirement to deliver a minimum of 467 dwellings (p24 of the NP). However, the associated SEA refers to a greater target of 567 dwellings to meet the 1100 Local Plan allocation for the area by 2030 (p12).</i></p>	<p>Suggests that the Plan fails to meet the basic conditions required (by law) for neighbourhood plans in that it is uncertain from the available documentation that the site appraisal and selection process has been a sufficiently robust process and used all the relevant criteria to test deliverability.</p> <p>Calls for greater clarity and robustness in the appraisal of the options within the context of an agreed growth target.</p>	<p>The respondent has usefully identified weakness in the current version of the Plan and points out that there are gaps and transparency in the process that was followed. Any review of the growth and development strategy needs to ensure that the Plan, along with its supporting documents including a revised SEA, demonstrate that the strategy will achieve the strategic targets and the preferred site allocation policies are deliverable in a sustainable manner.</p>
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		<p><i>This discrepancy needs to be addressed and creates doubt as to whether the NP is robust in terms of its approach to housing delivery.</i></p> <p><i>Situ8 are concerned that the plan in its current form does not fully comply with basic condition (c) as the Plan is unable to contribute towards meeting the housing needs of the area, identified within Policy 2a (Key targets) of Cornwall Local Plan Strategic Policies 2010-2030.</i></p>		
107	Turley for Redrow Homes	<p><i>There are numerous inconsistencies in the approach taken to allocate sites for development in the Draft Plan. Without considerable amendment, the Neighbourhood Plan will not meet basic conditions. The housing policies contained in the Neighbourhood Plan lack any justification or evidence base. Policy 3 in the Local Plan states that Wadebridge needs to look at new development needs up to 2030 and has been apportioned 1,100 dwellings. The Plan does not provide clarity on the capacity that is expected to be delivered on the sites allocated for development.</i></p> <p><i>The SEA Report which accompanies the consultation is required to assist the Plan on allocating sites for development. It is clear that the findings in the SEA have been retrospectively applied to the preferred Neighbourhood Plan approach. In particular the Bodieve site has previously been refused planning permission for up to 450 dwellings and the SEA is supportive that the site is inappropriate for development.</i></p>	<p>Suggests that the Plan fails to meet the basic conditions required (by law) for neighbourhood plans because it fails to provide sufficient justification or evidence for the site allocation policies and does not provide clarity on the delivery expectations for individual sites.</p> <p>Is critical of the SEA process which, it suggests did not adequately inform the site selection process.</p>	Same as 105 above
110	Cllr McHugh (CC)	<p><i>Wishes to see Wellington Place site include in the BUAB</i></p>	<p>Regards the previous boundary as historical – says changing the boundary to encompass site would bring redundant land into use</p>	Same as 34 above
112	Heynes Planning for Progress Land Ltd	<p><i>Within the context of the draft Site Allocations DPD, no site allocations are proposed within the NP area. The reason for that decision is explained in para. 1.6 of the DPD as it states “Five of these towns informed Cornwall Council that they which to produce their own Neighbourhood Development Plans ...”</i></p> <p><i>However, this approach is at odds with the statement made in the NP at para. 9.3.... It is imperative that the NP identifies sites for development to deal with the residual amount of housing and employment required over the plan period as set out in the Local Plan.</i></p> <p><i>In terms of the identification of sites for development, in summary, our Client considers that the development of the site identified on the attached plan (doc 1) can assist with meeting the objectives as set out in the NP for delivering development</i></p>	<p>Suggests that the Plan fails to meet the basic conditions required (by law) for neighbourhood plans in that it is unclear from the available documentation that the site appraisal and selection process has been a sufficiently robust process and used all the relevant criteria to test deliverability, including taking fully into account the planning history of the sites under appraisal.</p> <p>Questions the assumptions used in calculating future land requirement (relating to windfall allowance and lapsed permissions).</p>	Same as 105 above

		<p><i>that assists with meeting local needs whilst at the same time delivering sustainable growth.</i></p> <p><i>We note how the NP seeks to deliver housing development through a combination of commitments, windfalls and proposed site allocations.</i></p> <p><i>It is important that the most appropriate sites that can deliver the requisite amount of housing are identified. We do not seek to challenge the assumptions in the NP regarding the breakdown between each component of supply but do request that close scrutiny is given to the figure for the windfall allowance noting that Wadebridge as stated earlier is a town that is constrained by environmental features. Further, there needs to be a consideration of lapsed permissions and the impact that may have on the total number of units required to be provided by site allocations.</i></p> <p><i>A number of sites are identified for development for housing/ mixed use site allocations. Some of these sites have a planning history including planning applications that have been refused and dismissed at appeal. That means that our Client's site should not 'automatically' be discounted because it has had a planning refusal previously.</i></p> <p><i>While we support the identification of a housing requirement in the NP with sites identified for development, we raise objection to the fact that the most appropriate sites are not included. We raise objection to the sites included at draft Policies SD04 and TR04. In our view the evidence available does not provide enough clarity to support the inclusion of these sites. Land at Higher Church Park should be included. Our view is that the Plan does not meet the 'basic conditions' as set out in relevant legislation and explained in the PPG (Para.: 065 Reference ID: 41--065--20140306) and at present cannot be put to a referendum and be made.</i></p> <p><i>Noting the guidance provided in the PPG regarding the conduct of an examinations into a Neighbourhood Development Plan (Para: 056 Reference ID: 41--056--20140306) we consider that due to the nature of the issues we raise (as set out in this representation) they can only be properly assessed and examined through an oral hearing which we would like to attend.</i></p>	<p>Objects to some of the sites allocated in the Plan based on the available evidence and suggests that the site it has an interest in should be allocated instead.</p>	
190	Stride Treglown for Chaddlewood Investment Ltd	<p><i>The final bullet point of the aims section makes reference to meeting 'the required code for sustainable buildings'. It is not clear what environmental assessment method, if any, this relates to. The previously recognised Code for Sustainable</i></p>	<p>Seeks clarity on one of the aims, which refers to a "required code for sustainable buildings". Suggests that this aim may now be redundant given</p>	<p>Amend the wording of the aim so as not to suggest it relates to a specific code</p>

		<i>Homes assessment method was withdrawn by Government in 2015. Policies 12 and 13 of the adopted Local Plan already set requirements in respect of design and development standards and Policy 16 addresses health and wellbeing.</i>	the withdrawal of the Government's code.	
203	Scott Mann MP	<i>Why "the right sites in the right order"?</i>	Questions what this objective means	This is an agreed objective that reflects the community's wish that sites near town and in the built-up area should be developed before green field land is taken
222	Cornwall Council	<i>9.1 – abbreviation NPPF should be introduced earlier in the document at the first use of National Planning Policy Framework.</i>	Points out that the abbreviated 'NPPF' is introduced in 9.1 and should be earlier (It first appears in 5.8)	It could be used in para. 4.2 with some re-writing, which could also cover the publication and implications of the new NPP (2018)
222	Cornwall Council	<i>9.3 – Site Allocations DPD instead of Site Allocation Document (consistency)</i>	Suggests using DPD instead of 'document'	Accept the suggested amendment
222	Cornwall Council	<i>'Built-up Area Boundary' – the recommended term to use is 'Development Boundary'.</i>	Recommends alternative terminology	Consider whether to use the term ' <i>Development Boundary</i> ' and its ramifications in the context of the policies in the submission version of the Plan
222	Cornwall Council	<i>Footnote 11 - What does BUAB stand for? Would a more accurate to signpost be 'See BUAB report, available by following the 'Reference Documents' link at: <a href="http://wadebridge-tc.gov.uk/nhp">http://wadebridge-tc.gov.uk/nhp</a> or, 'See the BUAB report at <a href="http://wadebridge-tc.gov.uk/nhp/148-reference-documents.html">http://wadebridge-tc.gov.uk/nhp/148-reference-documents.html</a>'</i>	Suggests a re-wording of the footnote to make things clearer to all document users and offers alternatives	Consider whether to accept either of the suggested amendment in the interests of clarity
222	Cornwall Council	<i>The BUAB Report - explanatory maps, should be added e.g. within the Appendices, currently there are map references included but these are confusing as the maps don't appear to be included. Similarly, how is the document user going to be able to identify sites listed on page 9 of the document.</i>	Requests that the Plan has an appendix that includes a map that identifies clearly all relevant sites and locations referred to in to Plan	Consider including a key policy map
222	Cornwall Council	<i>The BUAB Report refers to content of the Town Framework Study. Where information from this has informed the Development Boundary, this should be included/summarised as part of the BUAB (you need to consider document users through the life of the NDP who want to integrate the evidence; they are not likely to understand this content or where it can be accessed).</i>	Wants the Plan to include more evidence or reference to evidence documents to justify policy	Ensure that the necessary supporting documents are available to view online alongside the Plan
222	Cornwall Council	<i>The conclusions of the BUAB Report would benefit from a review to read correctly from the stage in the process that the NDP is at.</i>	Suggests the BUAB Report is amended to better synch' with Submission Version of Plan	Review BUAB and ensure it is suitably compatible with the submission Version of the Plan
242	Amec for National Grid	<i>National Grid has identified the following high voltage overhead powerlines as falling within the Neighbourhood area boundary:</i>	Confirms that the high voltage overhead powerlines do not interact	Liaise with respondent if site allocation policies are substantially revised

		<p>4VW Route - 400kV from Indian Queens substation in Cornwall to Taunton substation in Taunton Deane</p> <p>From the consultation information provided, the above overheads powerline does not interact with any of the proposed development sites.</p> <p>Whilst there are no implications for National Grid Gas Distribution's Intermediate / High Pressure apparatus, there may however be Low Pressure (LP) / Medium Pressure (MP) Gas Distribution pipes present within proposed development sites.</p>	with sites identified in the Pre-sub Version of the NP	
244	South West Water	<p>For information, the development sites referred to are all known to South West Water, having been approached previously by potential developers. We will ensure that adequate provision is made over the plan period to ensure they can be adequately serviced.</p>	Confirms that SWW has knowledge of all the potential development land identified in the Pre-sub Version of the NP	Liaise with respondent if site allocation policies are substantially revised
254	Progress Land Ltd	<p>Progress Land has been promoting Church Park a development site in Wadebridge. I believe the NHP process followed is flawed.</p> <p>A call for sites at the beginning of the process should have been the right thing to do. Yet the NHP SG decided on their own preferred sites and didn't carry out this initial process.</p> <p>Church Park was discounted by the NHP SG and the evidence to support the current NHP sites appears flawed.</p> <p>In my view Church Park was not properly assessed by the NHP SG as part of the site assessment process. Other sites were chosen as preferable by the NHP SG and Church Park was continually overlooked. Church Park was the main site supported as part of the last public consultation, yet the NHP SG ignored the public support, despite the only opposition being from two councillors involved in the NHP SG, and chose to include another site (Bodieve), that actually had significant objection instead.</p> <p>It is my view that a number of conflicts of interest existed with existing and previous members of the NHP SG over many years. We have therefore submitted lots of email correspondence to suggest that the NHP SG has not acted appropriately given their own stated conflict of interests. It is my view that the NHP SG has failed to act appropriately and the process should now be handed over to Cornwall Council to finalise.</p> <p>Additionally, the Strategic Environmental Assessment produced by Aecom also appears problematic.</p> <p>As a land owner in Wadebridge, I therefore wish to object in the strongest possible terms to the current NHP on the above grounds.</p>	Believes the process in selecting allocated sites was flawed and biased particularly as it chose not to favour land at Church Park. Also questions the SEA's conclusions. As Church Park is not allocated in the Plan, it asks that the site allocation process is handed over to the local planning authority.	The respondent has criticised the lack of robustness in the site selection process on the basis that it considers the Church Park location to be a better option. Any review of the growth and development strategy needs to ensure that the Plan, along with its supporting documents (including a revised SEA), demonstrate that the strategy will achieve the strategic targets and the preferred site allocation policies are deliverable in a sustainable manner.

		<i>I believe Church Park should have been included in the NHP as it is a deliverable site, was supported by the majority of consultees, and should have been properly considered by the NHP SG and Aecom as part of the SEA report.</i>		
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### Summary Conclusion

People reacting to campaigns, to maps displaying discarded development options and also commenting on what is not in the Plan rather than what is in the Plan, has added an extra dimension to the process of analysis; and made interpretation more complex. What does seem apparent from the community's response to the development strategy proposed in the Pre-submission Version of the Plan is that the choice of sites for development is not something that is likely to achieve a consensus. Whilst it is inevitable that people who disagree with something are more likely to let their views be known than those that agree, this expression of disagreement cannot be ignored. In response to the general approach proposed to sustainable development and growth, the community's response reflects the array of opinions, concerns and fears that are out there, which will need to be reconciled in any review of the overall strategy.

Such a review is called for by those that have responded on behalf of land owners and developers. Several have made the point that the Pre-submission Version of the Plan, with its supporting documents, lacks enough evidential detail and explanation to justify the current set of policies and the preferred allocations. Whilst Cornwall Council has not been as critical of the overall strategy or site allocations, it is clear from its comments, that it believes the sustainable development policies and their context would benefit from being up-dated, to take into account current circumstances and context, and refinement to provide greater clarity.

### Policies

#### *Policy SD01 Built-up Area Boundary and Development Within Wadebridge Town'*

*Inset Map C defines the built-up area boundary of Wadebridge. Development or redevelopment proposals within the built-up area boundary will be supported, subject to compliance with the other policies in the Neighbourhood Plan.*

No.	From:	Summary of Comment	Planning reasons and other relevant comments (consultant's interpretation)	Consultant's Suggestions
17	Name withheld	<i>Focus on brownfield sites</i>	Wants development to be focusses on brownfield sites	The aim of the BUAB is to focus development on land that is within the settlement area and help prioritise brownfield land No change required
20	Name withheld	<i>Oppose site 16 being include</i>	Objects to site 16 being developed for housing because of traffic and harming the setting of Coronation Park	The site in question is outside of the built-up area boundary defined on map C
37	Name withheld	<i>Agree with proposed BUAB</i>	Agrees with boundary line as drawn	No change required
54	Name withheld	<i>Supports policy</i>	Support noted	No change required
109	Name withheld	<i>Concern to ensure all land inside the BUAB is not built on</i>	Points out that, within the defined BUAB, there are valuable landscape sites that contribute to the distinct character of the town, which should not be developed on	Several of the said sites are designated as local green space and protected by policy NE07, others are recreation areas No change required
175	Name withheld	<i>expand BUAB to include land east of Bodieve</i>	Suggests that land east of Bodieve should be included in the BUAB to resolve a contradiction between SD01 and SD04	The purpose of the BUAB is to describe the current limits of the built-up area and make plain that this area is the preferred area for development



				where proposals are acceptable in principle. No change required
184	Name withheld	<i>Supports policy</i>	Support noted	No change required
209	Name withheld	<i>Observations on land within and without proposed BUAB</i>	Notes that land between West Hill/Trevanson Road south west of the flood plain is available for development	Land mentioned by Respondent is with the built-up area boundary as described on map C No change required
228	Name withheld	<i>Supports policy</i>	Support noted	No change required
46	White Rock Residents Assoc.	<i>The revised built-up area boundary is suitable to development needs</i>	Support noted	No change required
105	Situ8 for Merriman Ltd	<i>Situ8 opposes the use of a settlement boundary if this would preclude sustainable development coming forward. The Framework is clear that development which is sustainable should go ahead without delay. The use of settlement limits to arbitrarily restrict suitable development from coming forward on the edge of settlements would not accord with the positive approach to growth required by the Framework and would be contrary to basic condition (a).</i>	Suggests that a BUAB may preclude sustainable development on the edge of the settlement from coming forward. If it does it would be contrary to the basic conditions.	The BUAB is a legitimate policy device to establish the appropriate growth strategy in a neighbourhood plan. Any review of the growth and development strategy needs to ensure that the BUAB policy remains a relevant and significant aspect of the strategy; and the Plan, along with its supporting documents, demonstrate that the strategy will achieve the strategic targets and the preferred site allocation policies are deliverable in a sustainable manner
107	Turley for Redrow Homes	<i>The development boundary is defined tightly around the built-up area of Wadebridge., The supporting text of draft NP Policy SD01 states that this is a revised built-up area boundary which reflects the current situation in terms of the extent of development and commitments. We consider that basic condition e) is highly relevant, there appears to be no rationale for the Plan's approach to the restrictive development boundary. This is not reflective of the Local Plan, and we therefore believe that this fails the basic conditions test; there is no evidence to demonstrate that this restrictive Policy could sufficiently meet the housing or employment needs that are set out in the Cornwall Local Plan.  The Objective Review of Built-up Area Boundary (November 2016) refers to the 1999 built-up area boundary which reviews development with planning permission since 1999 and development that is 'in the pipeline' that seems likely to gain permission. Further to this, para. 9.14 in the supporting text states that land that is not part of the defined built-up area by Policy SD01 is regarded as within the</i>	Suggests that there is no justification for the use of a BUAB as it will restrict growth especially as land all land immediately outside the boundary is regarded as countryside. Because this restriction may prevent targets being achieved, it considers the policy to be in conflict with the Local Plan	Same as 105 above

		<i>countryside unless it is allocated for development in the development plan.</i>		
190	Stride Treglown for Chaddlewood Investment Ltd	<i>This policy is supported in general terms. However, supporting Para. 9.12 states “a revised built-up area boundary for Wadebridge that reflects the current situation in terms of the extent of development and commitments is delineated on map C.” The Trevarner Farm site includes the majority of the land identified blue on Map D on Page 26 of the emerging NP, sitting outside of the built-up area boundary. It is considered that the grant of outline planning permission for the Trevarner Farm site must be viewed as a commitment and, in accordance with the justification set out in Para. 9.12 supporting Policy SD01, the Built-up Area Boundary depicted on Map C should be amended to include the Trevarner Farm land.</i>	Points out that the boundary as proposed in the Pre-submission Version of the Plan is out of date, based on the criteria used to define it. It does not include land that now has outline approval for development and should therefore be regarded as a commitment and included within the BUAB	Review and up-date the settlement boundary and confirm the criteria used, in a technical report reviewing the boundary in detail
215	WYG for Cornwall Care	<i>With reference to the attached site plan relating to planning permission PA17/01918, it is a matter of fact that the proposed settlement boundary includes three of the four field parcels that comprise the application site (the parcels in the west, the central parcel and the parcel to the east of it). However, the fourth field parcel in the far south east of the application site is not included within the settlement boundary. Para. 9.14 states that land (such as the fourth field parcel, above) that is outside of the defined built-up area boundary is regarded as countryside where growth would not be sustainable and ribbon development should be resisted.</i>	Points out that the site with outline planning approval is not all included within the proposed BUAB	Review the BUAB in the vicinity of the site in question using information provided on the planning permission and the criteria used (to ensure consistency)
216	WYG for Sainsburys	<i>We support the inclusion of the majority of the site at Higher Trenant Road within the built-up area boundary and the general thrust of Policy SD01 which seeks to support development or redevelopment proposals within the built-up area, providing they are in accordance with other policies in the NP. However, we would comment that the built-up area boundary in this location should accurately include the full extent of the site at Higher Trenant Road which has an extant outline planning permission for residential development and as outlined in the attached site location plan (Appendix A). Map C of the NP appears to exclude part of the northern-most section of the site and also a strip along the south eastern boundary of the site from within the built-up area boundary. The red line on the attached plan (Appendix B) shows the correct limit of the built-up area boundary of Wadebridge around the site at Higher Trenant Road which benefits from outline</i>	Points out that the proposed BUAB does not include all the land that has an extant outline planning permission for residential development. It provides a map that shows what should be the correct limit of the built-up area boundary of Wadebridge around the site (which differs from that shown on map C in the Plan). It suggests that amending the BUAB as requested will also require an amendment to the site boundary map E	Same as 190 above

		<i>planning permission for residential development. Notably, the suggested amendment to the built-up area boundary will require a consequential amendment to the boundary of the housing allocation on land at High Trenant (as identified in Policy SD03 of the NP), to the south east of the Sainsbury's site.</i>		
222	Cornwall Council	<i>Policy title – typo, remove apostrophe after Town.</i>	Appreciate the typo being pointed out	Amend the title of policy SD01 by deleting the apostrophe
222	Cornwall Council	<i>9.13 – you could mention that you will rely on higher level policies in these locations (i.e. infill and rounding off in line with Local Plan Policy 3)?</i>	Suggests adding a reference to the relevant policy in the LP	Consider adding additional sentence(s) to the end of para. 9.13 to link NP policy approach with Policy 3 of the LP
222	Cornwall Council	<i>Map C – could this be presented to fill one side of A4 in order to increase visibility?</i>	Wants bigger map	Consider including a larger map (full page)
222	Cornwall Council	<i>9.14 – consider ‘.....where it is considered that large scale growth would not be sustainable and ribbon development should be resisted.’</i>	Suggests adding ‘large-scale’	Consider the implications of adding the phrase ‘large-scale’
222	Cornwall Council	<i>9.16 – typo, ‘taking’ instead of ‘take’.</i>	Appreciate the typo being pointed out	Amend word in last line of para.
222	Cornwall Council	<i>Throughout the document, your policy wording should be checked for number formatting – remember (where there is more than one main policy criteria within a policy’s wording), to number both the main criteria of policy wording and the sub criteria as currently only sub criteria are numbered. 9.18 – It may be clearer to amend Policy SD01, to reflect the content of this para, as follows: Policy SD01 Built-up Area Boundary and Development Within Wadebridge Town Inset Map C defines the built-up area boundary of Wadebridge: 1. Development or redevelopment proposals within the built-up area boundary will be supported, subject to compliance with the other policies in the Neighbourhood Plan. 2. Proposals for housing and/or employment development outside of the built-up area boundary will not be supported unless they fall within the exceptions provided for in policies SD02 or SD03 or comply with policy HS03.</i>	Has a view on the formatting of the policies to establish a hierarchy of criteria	Consider the view expressed and establish your preferred hierarchy of criteria to be used throughout the Plan in the interests of clarity and consistency

### *Summary Conclusion*

Community respondents are generally happy with the concept of a built-up area boundary and the consultation boundary delineated on map C in the Pre-submission Version of the Plan.

The contributions from the organisational and business respondents is, with a couple of exceptions, supportive of the policy approach. Indeed, there is little criticism of the wording of the policy. The main criticism is the fact that the boundary is now out-of-date. Using the established criteria, there are sites that are now the subject of an outline planning consent that should be included within a revised BUAB.

### *Policy SD02 Development in the Countryside*

*Development proposals on land outside the built-up area boundary will be supported where they propose:*

- i. small-scale business/commercial schemes which will benefit the local rural economy; or*

- ii. *housing that meets an identified rural housing need conforming to Local Plan Policy 7 or affordable housing need on an exception site conforming to Local Plan Policy 9 or*
  - iii. *tourism and recreation related development appropriate in terms of scale and type in accordance with Neighbourhood Plan Policy SR7; or*
  - iv. *re-use of redundant or disused buildings for agricultural or business purposes in accordance with Neighbourhood Plan Policy JE3; or*
  - v. *the optimal viable use of a heritage asset or appropriate enabling development to secure the future of a heritage asset; or*
  - vi. *extensions to existing buildings, including extensions to dwellings, which are subservient to and respect the scale and appearance of the existing building.*
- In all cases the development proposal must demonstrate that its location, scale, design and construction materials will protect or enhance the rural nature of its setting.*

<b>No.</b>	<b>From:</b>	<b>Summary of Comment</b>	<b>Planning reasons and other relevant comments (consultant's interpretation)</b>	<b>Consultant's Suggestions</b>
54	Name withheld	<i>Supports policy</i>	Support noted	No change required
109	Name withheld	<i>Narrative needs correcting to include SHLAA requirements from 2020/21 onwards</i>	Points out need to up-date figures in para. 9.20	Up-date figures in 9.20
184	Name withheld	<i>Develop tourist facilities to make most of countryside</i>	Supports policy particularly iii related to tourism development, which will help make the most of the countryside	No change required
107	Turley for Redrow Homes	<i>Further to this, para. 9.14 in the supporting text states that land that is not part of the defined built-up area by Policy SD01 is regarded as within the countryside unless it is allocated for development in the development plan. Draft Policy SD02 is a restrictive countryside policy which is based on strategic plan requirement that does not set a limit on development. Both of these countryside policies lack clarity as they are based on the strategic plan requirement that does not set a limit on development. In regards to sustainable development, the NPPF states that for plan making, local planning authorities should positively seek opportunities to meet the development needs of their area. By introducing this restrictive policy, the NP is therefore not in compliance with basic conditions.</i>	Suggests that the policy is contrary to the NPPF as it serves to restrict development outside the BUAB. By limiting development opportunities in this way, it suggests that the Plan may not meet the basic conditions	The respondent has usefully identified weakness in the current version of the Plan. Any review of the growth and development strategy needs to address the matter of land on the fringe of the BUAB and establish with evidence if it merits the strong protection that this policy applies to the 'countryside' or whether development on the edge of the boundary can be controlled and limited through policy-based criteria that will not conflict with the basic conditions
215	WYG for Cornwall Care	<i>As drafted, Policy SD02 seeks to restrain development in the countryside and implies a presumption against the consented development. Cornwall Care supports the inclusion within the settlement boundary of three of the four field parcels associated with the above planning permission. However, it requests that the settlement boundary is extended to include the fourth field parcel. This would provide a more logical and consistent basis for consideration of future reserved matters applications by ensuring that the entire application site is within the defined built-up area boundary, ensuring that the entire site (where care</i>	Points out that part of a site with outline planning approval, is outside of the proposed BUAB and therefore subject to this policy. It requests that the settlement boundary is extended to include the entire site to ensure that future applications for reserved matters are not subject to a restrictive countryside policy	Review and up-date the settlement boundary and confirm the criteria used, in a supporting document

		<i>village development has previously been found to be acceptable) is subject to the same policy criteria.</i>		
222	Cornwall Council	<i>Criteria (i) and (ii) should be deleted as these don't add anything to higher level policies</i>	Suggests that two of the criteria are unnecessary as the matters are covered by the Local Plan	Review the criteria of the policy in the context of an overall review of the growth and development strategy and the need to ensure land outside the BUAB is adequately protected commensurate with its ecological value and landscape character
222	Cornwall Council	<i>Reference to policy SR07 at criteria (iii) should also be deleted as this is set out in Policy SR07 and so no need to repeat;</i>	Recommends that criterion iii is deleted as it covered by in more detail by separate policy in the Plan (SR07)	Consider deleting the criterion when revising the policy as part of the review of the growth and development strategy
222	Cornwall Council	<i>Criteria (iv) typo, amend JE3 to JE03;</i>	Appreciate the typo being pointed out	Amend format of policy reference in criteria iv to read JE03
222	Cornwall Council	<i>Criteria(v) this is fine but, not having read through the entire document yet, I wonder whether here is a more appropriate policy (heritage related, where this would be better placed).</i>	Raises the question as to whether the Plan should include a separate and more policy relating to heritage aspects	Ensure that heritage aspects are adequately addressed by the policies of the Plan
222	Cornwall Council	<i>Criteria (vi) should be deleted as this refers to permitted development rights and so this repeating area already covered by existing policies and procedures (which NDP should avoid).</i>	Suggests criterion vi should be deleted as it appears to refer to permitted development rights	Consider whether criterion vi can be re-phrased to ensure it has relevance
222	Cornwall Council	<i>Last sentence – this doesn't add anything to existing policies and procedures and as such should be deleted.</i>	Suggests last sentence of the policy does not add anything to existing policies and procedures and is therefore not necessary	Consider deleting the last sentence when revising the policy as part of the review of the growth and development strategy
222	Cornwall Council	<i>In light of the above comments, the recommendation is that this proposed policy is reduced significantly to: Policy SD02 Development in the Countryside Development proposals on land outside the built-up area boundary will be supported where they propose: 1. re-use of redundant or disused buildings for agricultural or business purposes in accordance with Neighbourhood Plan Policy JE03; or, 2. the optimal viable use of a heritage asset or appropriate enabling development to secure the future of a heritage asset.</i>	Proposes alternative pared down policy wording for SD02 that takes account of the comments it has made on various criteria in the draft policy	Consider whether the alternative policy suggestion is appropriate when revising the policy as part of the review of the growth and development strategy
222	Cornwall Council	<i>You could therefore consider removing Policy SD02 entirely and incorporating these requirements in a further revision of Policy SD01 as follows: Policy SD01 Built-up Area Boundary and Development Within Wadebridge Town Inset Map C defines the built-up area boundary of Wadebridge:</i>	Suggests, as an alternative, that the relevant bits of SD02 could be included in a revised policy SD01 that encapsulates the growth strategy for the neighbourhood area (wording is suggested)	Consider the relevance of the alternative policy approach when revising the policy as part of the review of the growth and development strategy

		<p>1. Development or redevelopment proposals within the built-up area boundary will be supported, subject to compliance with the other policies in the Neighbourhood Plan.</p> <p>2. Proposals for housing and/or employment development outside of the built-up area boundary will be supported where:</p> <p>i. they comply to the exceptions provided for in policy SD03 or comply with policy HS03, or</p> <p>ii. they propose the re-use of redundant or disused buildings for agricultural or business purposes in accordance with Neighbourhood Plan Policy JE03; or,</p> <p>iii. they propose the optimal viable use of a heritage asset or appropriate enabling development, to secure the future of this heritage asset.</p>		
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### *Summary Conclusion*

Community respondents are generally happy with a policy that seeks to place constraints on development within the countryside.

The limited contributions from the organisational and business respondents are less well-disposed towards the policy, at least as it may affect countryside on the edge of Wadebridge which it is suggested may be of lesser quality than countryside further out from the town, much of which has a statutory protection. Cornwall Council has expressed some concerns about the role and scope of the policy.

The purpose of the policy was to complement the other sustainable development policies and create an appropriate distinction between land where there is a presumption in favour of development and land where there is not. It may be that that distinction should be less binary. No-one is denying the importance of policies designed to safeguard the character and purpose of the countryside. However, as this policy is inextricably part of the growth and development strategy there is a need for its purpose and its likely impact to be considered as part of a review of the growth and development strategy.

### *Policy SD03 Housing Site Allocations*

*The following sites are allocated for housing purposes:*

*Land at High Trenant (as shown on inset Map D)*

*Land at Trevarner (as shown on inset Map E)*

*Proposals for residential development will be supported provided that:*

- i. they are of an appropriate scale, design and layout, including landscaping proposals and boundary treatment, which take account of the relationship with adjoining and nearby properties and uses, to ensure it achieves an acceptable standard of residential amenity, character and access;*
- ii. the development would not have an unacceptable impact on the local highway network; and*
- iii. the development meets the requirements set out in the Neighbourhood Plan and the Local Plan.*

*Land at Keston/Dunveth (as shown on inset Map F) is allocated for the development of specialist accommodation that meets the independent housing and care needs of elderly and disabled persons.*

<b>No.</b>	<b>From:</b>	<b>Summary of Comment</b>	<b>Planning reasons and other relevant comments (consultant's interpretation)</b>	<b>Consultant's Suggestions</b>
51	Name withheld	<i>Opposes development at Higher Trenant</i>	Opposes development at High Trenant, even though it now has outline consent. The traffic and pollution will harm Egloshayle	When reviewing the growth and development strategy, recognise that some people have concerns about the negative impact of the development and ensure policies

				and their criteria address these concerns as much as is possible
54	Name withheld	<i>Higher Tenant needs green strip</i>	Proposes a 'green strip' around development	Same as 51 above
89	Name withheld	<i>Land at Tenant and Trevarner Fields would impact on roads and drainage</i>	Concerned about flood risk to Egloshayle as a result of the development of land at Tenant and Trevarner Fields	The Plan must make plain that the growing flood risk as a result of continued climate change and the impact of new development needs to be taken fully into account
141	Name withheld	<i>Sites 5 and 6 need to have access in and out</i>	Wants separate access and egress routes to new development that don't use current estate roads, which don't have capacity and could endanger children at play	Same as 51 above
142	Name withheld	<i>Sites 5 and 6 have access problems</i>	Believes current access to Foxdown and Marshall Ave should be used by emergency vehicles only	Same as 51 above
144	Name withheld	<i>Sites 5 and 6 – sewerage situation must be addressed in advance of construction</i>	Points out that main sewerage pipe is at rear of Foxdown Manor houses and is completely inaccessible for repairs	Same as 51 above
152	Name withheld	<i>Advocates Community Land Trusts to ensure affordable homes remain available</i>	Points to St Minver as an example of how self-build can provide more affordable homes	Same as 51 above
176	Name withheld	<i>Support development at Trevarner, with restricted access</i>	In favour of development at Trevarner if access through Egloshayle village is pedestrian-only – such a pedestrian route would also reduce local traffic generation from new development	
209	Name withheld	<i>Observation on developability of sites</i>	Trevarner - stresses the need to ensure there is a route to the site for large vehicles for construction and delivery of furniture Higher Tenant – objects to residential development, site is in an industrial area and should be developed for employment uses Keston/Dunveth – suitable for specialist housing because of limited traffic generation – needs screening from nearby retail and industrial uses	Same as 51 above
237	Name withheld	<i>Opposes development on land at Trevarner</i>	Does not support development at Trevarner because of likely traffic increase on Tower Hill	Same as 51 above



46	White Rock Residents Association	Agree with development target and sites	Supports policy	No change required
101	Persimmon Homes	<p><i>Para. 9.20 requires updating in view of the now committed sites at Higher Trenant and Trevarner.</i></p> <p><i>The planning status of these sites has moved on since the drafting of this paragraph, both sites now being subject to outline planning approval. Para. 9.24 should be redrafted to reflect the up to date planning history.</i></p> <p><i>In terms of the wording of Policy SD03, we generally support the aims of the policy however it appears that the Inset Map references for Higher Trenant and Trevarner are incompatible with the references on the Inset Maps themselves.</i></p>	<p>Generally supports the aims of the policy</p> <p>Points out that sites referred to in policy SD03 now have outline planning approvals and this should be reflected in the Plan</p> <p>Points out that the map references are “incompatible” (The policy text refers to a site shown on Map E, which is actually shown on Map D)</p>	<p>Recognise that some sites ‘allocated’ in this policy now have an outline planning approval. Their changed status and their potential capacity should be taken into account when reviewing the growth and development strategy</p>
102	Historic England	<p><i>We have looked at the many supporting and reference documents on the Plan website but there is little direct information to demonstrate how the significance of relevant designated heritage assets has been understood and used to inform the suitability of the proposed sites for development. Reference is made in some cases to previous reports upon which the documents in question depend; while these might be helpful, they are not available. The Built Environment Topic paper, for example, identifies historic environment considerations but does not elaborate on how these should inform the Plan.</i></p> <p><i>The one report which makes specific provision for the consideration of the possible effects of the Plan on the historic environment is the SEA Report dated March 2018. This considers each of the proposed site allocations against identified heritage assets and summarises its findings in a series of tables. These conclude that all of the sites have the potential to adversely affect designated heritage assets, in terms of individual sites and the strategic setting of the town, and in some cases will actually do so. There is no information on how the exercise has determined the identification of the heritage assets in question or the level of harm to their significance which may result.</i></p> <p><i>These findings are elaborated upon in section 5.5 (p40) which asserts that once mitigation has been taken account of any impact will be reduced (though not apparently eliminated), especially through the application of complementary policy SD05 aimed at protecting Local Character.</i></p>	<p>Points out that the SEA identifies that all of the sites have the potential to adversely affect the historic environment and/or heritage assets. Yet there is no reference to the potential impact that the development of these sites might have on the historic environment, and no criteria in the policy to either protect or mitigate. Does not call for anything specific but clearly feels this is an omission.</p>	<p>Consider whether the impact of growth and major development on the historic environment can be properly addressed within policies in the NP and cross-referenced to the SEA</p> <p>Any allocations where there is potential impact on heritage assets should have reference to mitigating any adverse impacts on the asset and its setting.</p>
107	Turley for Redrow Homes	<p><i>Overall, it is unclear in Policy SD03 and the supporting text that the allocations will be meeting these requirements that the Cornwall Local Plan has set out.</i></p>	<p>Points out that some of the sites referred to this policy now have outline planning approval.</p>	<p>Same as 101 above</p>



		<p><i>Draft Policy SD03 provides the sites that are allocated for housing purposes including Land at High Trenant, Land at Trevarner and Land at Keston/Duveth (which is allocated for the development of specialist accommodation, meeting independent housing and care needs of elderly and disabled persons). These sites are considered in turn below.</i></p> <p><i>Re: Land at High Trenant and Land at Trevarner</i></p> <p><i>The Neighbourhood Plan states that both of these sites about the BUAB and are considered to be acceptable for housing. There is no justification as to why these sites are acceptable and the NP has not considered the fact that these sites are subject to the following applications:</i></p> <ul style="list-style-type: none"> <li><i>• Land at High Trenant was subject to an outline planning application for the development of 204 residential dwellings which was approved in February 2018 (PA17/05689). The SEA published for consultation suggests that this site has an approximate capacity of 244 dwellings.</i></li> <li><i>• Land at Trevarner was granted outline planning permission for development of up to 95 units in November 2017 (PA17/07913). The SEA published for consultation does not give an indicative housing number for this site.</i></li> </ul> <p><i>Land at Keston/Dunveth</i></p> <ul style="list-style-type: none"> <li><i>• This site that is allocated is adjacent to a site that has been granted outline permission for a 72 bed nursing home and 75 extra care units in a care village. There is currently no planning application submitted for the allocated site. The SEA suggests that this site has a capacity of 50 dwellings.</i></li> <li><i>• The supporting text (para. 9.25) refers to the adjacent site. The policy does not provide any further guidance on the site that is allocated or the amount of dwellings proposed on the site.</i></li> </ul> <p><i>These sites are allocated in the Draft Plan and lack clarity in terms of the housing capacity that is expected to be delivered. Further to this, the location plans of the sites with planning permission do not completely match those shown in this policy therefore the scale of the allocations also lacks clarity. As two of these sites currently have planning permission, the NP policy does not quote any dwelling figures, despite these being approved applications and the SEA providing figures based on the sites approximate capacity.</i></p>	<p>Questions the assumptions made on the numbers of dwellings and suggests therefore that the Plan fails to provide sufficient guidance and clarity on the scale of the allocations</p>	
190	Stride Treglown for Chaddlewood Investment Ltd	<p><i>Para. 9.20 – In light of the February 2018 permission for the Trevarner Farm site, the figures presented in para. 9.20 should be updated to include the additional 204 dwellings with planning approval, not yet</i></p>	<p>Recommends that the figures used in para. 20 are up-dated and include recent planning permissions</p>	<p>Ensure the figures quoted in an updated version of the Plan are those that are used to assess</p>

		<i>constructed. Additionally, these figures should also reflect the grant of permission at appeal in October 2017 for up to 95 dwellings on land at Higher Trenant Road, commonly referred to as the Sainsburys site.</i>		capacity and targets and are relevant at the time the Plan is prepared
190	Stride Treglown for Chaddlewood Investment Ltd	<i>Policy SD03, Housing Site Allocations and Para. 9.24 – Based on comments provided in respect of Policy SD01 it is not considered necessary to allocate the Trevarner Farm site for housing as it is now a commitment. This should be reflected in its inclusion within the Built-up Area Boundary. In addition, para. 9.24 should be updated to reflect any change to the Built-up Area Boundary and housing site allocations. However, should a change to the Built-up Area Boundary not be considered appropriate, then Policy SD03 is supported. An inconsistency between the map labelling in the policy text and on the maps has been identified. The policy text states that the land at Trevarner is shown on Map E but this is actually shown on Map D.</i>	Suggests that land at Trevarner should no longer be included in this policy. It should be included within a revised BUAB	Same as 101 above
215	WYG for Cornwall Care	<i>Policy SD03 allocates land at Keston/ Dunveth for the development of specialist accommodation that meets the independent housing and care needs of elderly and disabled persons (inset Map F). Inset Map F allocates for development the fourth field referred to above, together with additional land to the east. This allocated land is entirely within the “countryside” as defined by the built-up area boundary, where restraint policies apply. It is considered that there is conflict between the development allocation and the countryside location. Cornwall Care supports the allocation of this land under Policy SD03 and considers that the allocated Keston/Dunveth site should be included within the defined built-up area boundary</i>	Supports the allocation of land for development but requests that the land is included within the BUAB so as not to be subject to ‘countryside’ policy	Consider how the proposed specialist housing, on the land in question, can best be facilitated by a policy as part of the review of the growth and development strategy, whether it be within the BUAB or as an allocated site outside the BUAB. The key thing is for both the policies and maps to be clear as to the status of the land in question.
216	WYG for Sainsburys	<i>The NP notes that the Higher Trenant Road site has ‘been the subject of potential residential development applications in recent years’ (para. 9.29), but doesn’t recognise that the site benefits from planning permission for residential development. For completeness and accuracy, the NP should recognise that the site at Higher Trenant Road has not only been the subject of potential residential development applications but has outline planning permission for residential development for up to 95 units. Furthermore, in addressing the replacement of the saved employment allocation WAD7 (i.e. part of the Sainsbury’s site at Higher Trenant Road) of the North Cornwall Local Plan, the NP</i>	Points out that the site at Higher Trenant Road now has outline planning permission for residential development, which is not recognised in the Plan Requests a clarification on the relationship between the policy and the previous saved policies in the North Cornwall Local Plan	Same as 101 above

		<i>appears to suggest that Policy SD03 allocates the same site for residential development (para. 9.30). For accuracy, it should be clear in the NP that land formally allocated under WAD7 related to land part of the site at Higher Trenant Road, which currently benefits from outline planning permission for residential development and <u>not</u> the identified housing allocation under Policy SD03.</i>		
222	Cornwall Council Transport	<i>New development should look to provide or improve existing walking and cycling links to local services and public transport infrastructure. Link to TT03.</i>	Would like to see a reference in the text to the relationship of this policy with TT03 (relating to safe cycle and pedestrian links within and from new major housing developments)	Consider including a reference to policy TT03
222	Cornwall Council	<i>9.20 – NDPs should contain a section which clearly sets out the quantity of housing which the policies of the NDP plan for, together with confirmation that these meet the Local Plan targets. Currently this information does not stand out clearly enough. An example/template housing statement section is available for NDP groups to use within either of the following documents, ‘Housing Statement guidance Part 1: NDP Housing Target’ or ‘Housing Statement guidance Part 2: Delivering your NDP Housing Target’, both available at (weblink provided)</i>	Wants to see a clear statement of the quantity of housing which the policies of the NP plan for, together with confirmation that these meet the Local Plan targets (format is suggested in recently issued guidance)	Ensure the Plan includes an up-to-date housing statement based on the latest requirement of the Local Plan that reflects the housing supply figures used to review the growth and development strategy
222	Cornwall Council	<i>Footnote 13 – there is not a clear document in your evidence base (where the associated link takes you to) that is entitled ‘Wadebridge Growth Area Site Review’?</i>	Says weblink at footnote 13 does lead to a document entitled ‘Wadebridge Growth Area Site Review’	Ensure all weblinks are working and correct
222	Cornwall Council	<i>9.21 – Its noted that in your evidence base documents you include three documents (WANP BUA Report; WANP Options Paper; and, WANP Wadebridge Area Land Supply Assessment – Technical Report). Within all of these there is a useful figure (Fig 1) which gives an overview of how the work (and documents) link. It would be useful to:</i> <i>i. Ensure that the titles of and the reference to the three documents is consistent, through the NDP document (including footnotes; the evidence base documents; and the links to these) as currently it is confusing. For example, the 3rd document in the process is referred to as all of the below:</i> <ul style="list-style-type: none"><li>• ‘Options for potential sites to be developed to accommodate growth...’ (in the Fig 1 (inclusion of the title of the paper in this figure would be good));</li><li>• ‘Wadebridge Growth and Development Policy Options’ (the title within the document);</li><li>• ‘WANB Options Paper’ (the title on your online evidence base resource);</li><li>• ‘The Review’ (Para 9.21); and,</li></ul>	Requests clarity and consistency in the use of titles and references to supporting documents	Ensure all weblinks are working and correct

		<ul style="list-style-type: none"> <li>Wadebridge Growth Area Site Review 2017 (Footnote 13).</li> <li>ii. It would be useful to include Figure 1, referred to above, in this section of the NDP. This, together with consistent titles and correct links, would help document users who are unfamiliar with your work.</li> </ul>		
222	Cornwall Council	9.21 – A footnote (and related link) to where the document user can find your source Town Framework evidence should also be added.	Requests a footnote and weblink to Town Framework-related evidence (documents)	Ensure all weblinks are working and correct
222	Cornwall Council	9.24 – good practice to use plain English and so recommend rewording with regard to ‘cognisant’.	Questions use of the word ‘cognisant’, suggests using an easier to comprehend word	Carry out a plain English check of the next version of the Plan
222	Cornwall Council	Policy SD03 – in the policy wording, include reference to what the site areas are (in hectares), also how many houses each site could be expected to accommodate.	Recommends that the area and expected yield from each site is included to help establish that the Plan will achieve its targets	Ensure that site areas and anticipated development yields are available
222	Cornwall Council	Policy SD03 – delete criteria (iii), as this doesn’t need stating.	Believes criterion iii is unnecessary as it states the obvious	Consider deleting the criterion when revising the policy as part of the review of the growth and development strategy
222	Cornwall Council	<p>Maps D, E and F – these maps would benefit from:</p> <ul style="list-style-type: none"> <li>i. being enlarged (preferably to a scale that enables key street names to be read); and,</li> <li>ii. the inclusion of an overarching map/inset map showing the locations of these sites in relation to the wider town.</li> </ul> <p>Both of these improvements will assist the document user (particularly those not so familiar with Wadebridge).</p>	Requests larger scale maps and an overarching map/inset map showing the locations of these sites in relation to the wider town to help those not familiar with the area	Ensure maps are adequate in scope and relevant to the policy and can be clearly read and interpreted
251	Natural England	<p>This policy allocates the High Trenant and the Trevarner sites for housing development. The SEA states that ‘In relation to the housing allocations taken forward through the NP, all sites are located outside of the BUAB, and have the potential to adversely impact upon the wider landscape character’. No landscape assessment could however be found to support the site selection and allocation. The policy contains only a generic criterion concerning landscape impacts for these two sites. The site selection and allocation should be underpinned by a landscape assessment for each site, including assessment of impacts on the AONB, and site-specific recommendations from the assessments should be reflected in the allocation policy. The Trevarner site is located within the Impact Risk Zones for SSSI and River Camel SAC / River Camel Valley SSSI. The allocation should be supported by an assessment of the potential impact of the proposed development on this internationally protected site and specific policy criteria relating to mitigating any impacts on</p>	<p>Criticises the apparent lack of a formal landscape assessment particularly as the SEA points out that all site have the potential “to adversely impact upon the wider landscape character”</p> <p>Requests a landscape assessment for each site and site-specific recommendations, which translate into bespoke policy criteria</p> <p>It states that the assessment of the impact of development on the AONB is of particular significance</p>	The respondent has usefully identified weakness in the current version of the Plan. Any review of the growth and development strategy needs to ensure that it can be demonstrated that policies allocating sites for development have adequately taken into account ecological impact and landscape character and site-specific criteria are included in the policies to ensure any adverse impact is minimised or mitigated

		<p><i>these designations, e.g. impacts on water quality, should be included. We recommend that you look at the Cornwall Allocations DPD which dealt with similar issues.</i></p> <p><i>Policy SD03 also allocates the Keston/ Dunveth site which is in close proximity of the AONB but gives no criteria for this development in terms of making the development acceptable in respect of landscape. There is no site-specific landscape assessment and no certainty exists whether the site can be developed without a significant adverse on the AONB. The SEA is silent on this site. The site allocation should be informed by a site-specific landscape assessment which needs to include assessment of the impacts on the AONB. The site should be included and assessed in the SEA. Any recommendations should be translated into bespoke policy criteria about landscaping and siting of the new development on the site.</i></p>		
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### *Summary Conclusion*

The policy itself is now out-of-date. Despite significant concern expressed by the several community respondents about development on the allocated sites, outline planning consent has been given for two of the sites named in the policy.

Whilst the policy itself may be largely redundant, there is a need to react to the concerns expressed by local people (largely about the potential harmful impact of major development within the built-up area on the surrounding area and infrastructure) and ensure as far as possible that these concerns are addressed in the revised policies in the Plan.

Historic England and Natural England have expressed the view that the site policies allocating sites/areas for development, even within the built-up area, must include a requirement for development proposals to assess adequately the potential impact it may have on its surroundings, and ensure any adverse impact is minimised or mitigated. Cornwall Council requests that the context for the site allocation policies is brought up-to-date and provide sufficient detail to justify and explain the policy on a site by site basis.

### *Policy SD04 Mixed Use Site Allocation*

*Land east of Bodieve (as indicated on map G), is allocated for a mixed-use development to:*

- i. create a neighbourhood of high quality design and unique character within an outstanding natural environment;*
- ii. deliver a mix of housing types, tenures and designs, that meet high standards of sustainable living and primarily serves identifiable local needs;*
- iii. foster and facilitate integration between the neighbourhood and Wadebridge (including bridges, roads, pedestrian links, cycle paths and public transport);*
- iv. include open spaces and facilities that will help foster a sense of community;*
- v. embrace the principles of accessibility for all;*
- vi. include a zone for businesses development; and*
- vii. address satisfactorily any issues relating to: access, traffic and highways, flooding, visual intrusion in the landscape and infrastructure capacity.*

*Development proposals should be subject to a comprehensive masterplan that should set out the proposed 'phasing' (expected completion years for different aspects of the development), taking into account the capacity of local infrastructure to meet residents' needs.*

No.	From:	Summary of Comment	Planning reasons and other relevant comments (consultant's interpretation)	Consultant's Suggestions
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7	Name withheld	<i>Opposes development on land east of Bodieve citing several reasons</i>	<p>Provides several reasons why development on land east of Bodieve should not be permitted:</p> <ul style="list-style-type: none"> <li>• Loss of high quality (grade 2) agricultural land</li> <li>• Housing quota can be met within the town boundary</li> <li>• Against expressed view of the community</li> <li>• Multiple transport issues</li> <li>• Harm to hamlet of Bodieve</li> <li>• Impact on local school places available to those outside</li> <li>• Potential harm to wildlife sites at Lower Trevilling (storm water increase)</li> <li>• Light pollution at Bodieve (a rural dark area)</li> <li>• Harm to landscape character and setting of Wadebridge</li> </ul>	Recognise that there is significant community opposition to the allocation of land east of Bodieve for major development that has cited a number of planning reasons why the proposed allocation is inappropriate. Any review of the growth and development strategy has to show to the satisfaction of the local community that the preferred strategy approach within the Plan is the most appropriate and sustainable option and the issues they cite can be overcome
8	Name withheld	<i>Opposes development on land east of Bodieve</i>	Submits same reasons and arguments as No. 7	Same as 7 above
9	Name withheld	<i>Opposes development on land east of Bodieve</i>	Submits same reasons and arguments as No. 7	Same as 7 above
10	Name withheld	<i>Opposes development on land east of Bodieve</i>	Submits same reasons and arguments as No. 7	Same as 7 above
11	Name withheld	<i>Opposes development on land east of Bodieve</i>	Submits same reasons and arguments as No. 7	Same as 7 above
16	Name withheld	<i>Opposes development on land east of Bodieve</i>	Submits same reasons and arguments as No. 7	Same as 7 above
20	Name withheld	<i>Supports policy</i>	Support noted	No change required
25	Name withheld	<i>Supports policy</i>	Support noted	No change required
28	Name withheld	<i>Opposes development on land east of Bodieve impact on hamlet of Bodieve</i>	Says the proposed policy would result in the massive over-development of a small farming hamlet	Same as 7 above
29	Name withheld	<i>Opposes development on land east of Bodieve impact on hamlet, traffic and air quality</i>	Proposals would destroy a small hamlet – not necessary as there is enough capacity within existing Wadebridge boundaries	Same as 7 above
30	Name withheld	<i>Opposes development on land east of Bodieve impact of hamlet</i>	Says development on this scale is unnecessary to meet the targets Concerned about infrastructure implications, loss of good agricultural land and harm to Bodieve Believes the by-pass was the outer limit	Same as 7 above

31	Name withheld	<i>Opposes development on land east of Bodieve impact of hamlet</i>	Proposal would result in over-development of a small hamlet	Same as 7 above
35	Name withheld	<i>Opposes development on land east of Bodieve – would like Church Park in Plan</i>	Proposal is excessive and would cause too much traffic – would prefer the church Park development to be in the Plan	Same as 7 above
37	Name withheld	<i>Support policy for mixed use development</i>	Support noted	No change required
40	Name withheld	<i>Opposes development on land east of Bodieve</i>	Considers land east of Bodieve to be unsuitable for development because: It is good agricultural land Lack of mains drainage and risk of storm water flooding downstream Would result in a separate settlement but destroy character of hamlet	Same as 7 above
42	Name withheld	<i>Opposes development on land east of Bodieve</i>	Submits same reasons and arguments as No. 7	Same as 7 above
49	Name withheld	<i>Opposes development on land east of Bodieve loss of countryside and traffic issues</i>	Points out that land east of Bodieve is grade 2 agricultural land There is enough land within town boundary Major traffic problems Flood risk from sloping site Light pollution harm to AONB	Same as 7 above
50	Name withheld	<i>Opposes development on land east of Bodieve loss of countryside and traffic issues</i>	Points out that land east of Bodieve is grade 2 agricultural land There is enough land within town boundary Major traffic problems Flood risk from sloping site Light pollution harm to AONB	Same as 7 above
52	Name withheld	<i>Opposes development on land east of Bodieve</i>	Submits same reasons and arguments as No. 7	Same as 7 above
54	Name withheld	<i>Support with minimum 5% self-build</i>	Says development should include a minimum of 5% self-build plots	Discuss policy approach with Cornwall Council Ensure self-build plots are an integral part of the growth and development strategy
71	Name withheld	<i>Oppose - concerned about traffic implications of policy</i>	Says development would result in traffic congestion, supports Church Park which is away from congested parts of Wadebridge	Same as 7 above
88	Name withheld	<i>Supports policy</i>	Support noted	No change required
97	Name withheld	<i>Area set aside seems excessive in size</i>	Supports policy but says that area set aside for mixed-use seems excessive in size	Same as 7 above
98	Name withheld	<i>Supports policy</i>	Support noted	No change required

99	Name withheld	<i>Supports policy</i>	Support noted	No change required
100	Name withheld	<i>Any development must consider impact of traffic on roads down to town</i>	Requires development proposals around "Ball" to consider the traffic impact on already congested roads down to town	Ensure concerns raised about the impact of major development in the vicinity of Bodieve are taken into account
103	Name withheld	<i>Keep sufficient agricultural land to ensure hamlet of Bodieve is protected</i>	Advocates a buffer zone to protect Bodieve if land to the east is developed – by protecting good quality agricultural land	Same as 100 above
104	Name withheld	<i>Opposes development because of extensive highway modifications and loss of agric' land</i>	Says site cannot be delivered in a sustainable manner because of: Extensive highway modifications Loss of best and most versatile agricultural land Harmful visual impact Traffic congestion into town	Same as 100 above
106	Name withheld	<i>Opposes development on land east of Bodieve on traffic grounds</i>	Opposes the proposed policy on traffic grounds	Same as 100 above
109	Name withheld	<i>Too much development in one area for the infrastructure to cope</i>	Considers land east of Bodieve to be over-development in one area Infrastructure will not cope (health, education, traffic) Regarding sewage, concerned about discharges in upper reaches of river Camel	Same as 7 above
139	Name withheld	<i>In favour of development proposal</i>	Supports policy as it would alleviate backlog of traffic headed for Rock and it is close to secondary school	No change required
152	Name withheld	<i>Protect identity of Bodieve</i>	Says we should protect villages like Bodieve, which will lose its identity if proposed development goes ahead	Same as 100 above
154	Name withheld	<i>Opposes development on land east of Bodieve highway modifications</i>	Says site cannot be delivered in a sustainable manner because of: Extensive highway modifications Loss of best and most versatile agricultural land Harmful visual impact Traffic congestion into town	Same as 7 above
155	Name withheld	<i>Opposes development on land east of Bodieve loss of countryside</i>	Would not like to see a quiet hamlet like Bodieve destroyed Major concern about coping with additional traffic flows going through town	Same as 7 above
159	Name withheld	<i>Opposes development on land east of Bodieve impact on hamlet</i>	Bodieve will lose its identity The land in question is prime agricultural land	Same as 7 above



			Future development should focus on lower grade land or brownfield sites	
160	Name withheld	<i>Suggests protecting agric'l land and green space to ensure Bodieve remains a hamlet</i>	Advocates a buffer zone to protect Bodieve if land to the east is developed – by protecting good quality agricultural land	Same as 103 above
161	Name withheld	<i>Suggests protecting agric'l land and green space to ensure Bodieve remains a hamlet</i>	Advocates a buffer zone to protect Bodieve if land to the east is developed – by protecting good quality agricultural land	Same as 100 above
163	Name withheld	<i>Opposes development on land east of Bodieve – traffic implications</i>	Concerned about extent of land allocated Believes development on land east of Bodieve will not reduce traffic problems of St Mathews Hill and down Gonvena	Same as 100 above
165	Name withheld	<i>Prefer development of sites near showground if not, sites 25, 30 and 31 offer best option</i>	Sees the land in question as being second best but, if it improves access to the west (Rock and Port Isaac) this will reduce problems on St Matthews Hill and Gonvena Hill	No change required
172	Name withheld	<i>Opposes development on land east of Bodieve highway modifications</i>	Opposes development on land east of Bodieve because of extensive highway modifications and road safety issues (for pedestrians)	Same as 100 above
174	Name withheld	<i>Supports policy and selection of land east of Bodieve</i>	Considers the land in question to be a better development option than Church Park	No change required
176	Name withheld	<i>Consider access as on Wyndthorpe Estates</i>	Advocates access arrangements to prevent traffic clashes at roundabout	Same as 103 above
184	Name withheld	<i>Supports policy</i>	Support noted	No change required
188	Name withheld	<i>Opposes development on land east of Bodieve</i>	Submits same reasons and arguments as No. 7	Same as 7 above
195	Name withheld	<i>Opposes policy – to protect the characterful hamlet of Bodieve</i>	Wants to protect character of hamlet Concerned about light pollution and loss of agricultural land	Same as 100 above
197	Name withheld	<i>Supports policy</i>	Support noted	No change required
201	Name withheld	<i>Opposes development on land east of Bodieve</i>	Submits same reasons and arguments as No. 7	Same as 7 above
202	Name withheld	<i>Rational to develop land east of Bodieve if Gonvena is not to be developed</i>	Accepts that the policy is appropriate given constraints on other sites	No change required
204	Name withheld	<i>Opposes development of agricultural land</i>	Points out that the land in question is prime agricultural land There is no natural boundary to prevent development spreading	Same as 100 above

			onwards and outwards and taking countryside Also concerned about major traffic problems emanating from such a scale of development	
205	Name withheld	<i>Little justification in losing good quality agricultural land</i>	Development on land east of Bodieve will have large visual impact because of its altitude and cause light pollution Good quality farming land will be lost Traffic problems will worsen because people will use cars not cycle or walk because of gradients and distance from town	Same as 100 above
209	Name withheld	<i>Observation on traffic issues</i>	Suggests new highway configuration including new distributor road	Same as 100 above
213	Name withheld	<i>Opposes development on land east of Bodieve</i>	Submits same reasons and arguments as No. 7	Same as 7 above
214	Name withheld	<i>Opposes development on land east of Bodieve</i>	Submits same reasons and arguments as No. 7	Same as 7 above
219	Name withheld	<i>Opposes development on land east of Bodieve</i>	Submits same reasons and arguments as No. 7	Same as 7 above
220	Name withheld	<i>Opposes development on land east of Bodieve</i>	Submits same reasons and arguments as No. 7	Same as 7 above
223	Name withheld	<i>Opposes development on land east of Bodieve</i>	Submits same reasons and arguments as No. 7	Same as 7 above
224	Name withheld	<i>Supports development at Bodieve</i>	Supports proposal because it would take traffic away from Gonvena Hill	No change required
230	Name withheld	<i>Opposes development on land east of Bodieve</i>	Submits same reasons and arguments as No. 7	Same as 7 above
234	Name withheld	<i>Opposed to development on land east of Bodieve</i>	Opposes proposal, thinks Church Park proposal is a more comprehensive and thoughtful development	Same as 7 above
235	Name withheld	<i>Area should not be over-developed</i>	Development on the scale proposed would lead to a separate settlement and result in the loss of good agricultural land	Same as 100 above
236	Name withheld	<i>Supports development on land east of Bodieve</i>	Believes the proposal is a good one provided there is plenty of green spaces and recreational areas, adequate community infrastructure (schools, doctors, dentists), good road access, mainly affordable houses, employment opportunities and no 2 <sup>nd</sup> homes	No change required
240	Name withheld	<i>Concerns about the way major site would be developed</i>	Concerned that scale proposed is unnecessary Too much agricultural land would be lost Walking and cycling will not be popular because of gradients therefore more consideration needs to be	

			given to traffic and transport needs Little reference to affordable housing	
243	Name withheld	<i>Opposed to major growth and development on land east of Bodieve</i>	Opposition mainly because of traffic fears	Same as 7 above
252	Name withheld	<i>Opposes development on land east of Bodieve</i>	Submits same reasons and arguments as No. 7	Same as 7 above
46	White Rock Residents Association	<i>Supports policy</i>	Support noted	No change required
101	Persimmon Homes	<i>The supporting text of Policy SD04 states that the site at Bodieve has the potential to meet outstanding housing targets to the end of the plan period. However, as noted elsewhere in our submission, the residual housing requirement within the Plan requires updating in light of recent planning approvals and in any event, neither the Policy itself nor the supporting text identifies the scale of provision anticipated within the site. It is not clear whether the site is intended to deliver all of the required growth for the plan area or whether it is seen as an aspirational site. If the site is to remain as an allocation, there needs to be a clear assessment of when it is anticipated that the site will deliver the needs of community and to what scale within the plan period.</i>	Requests a clear statement of the scale and provision on the Bodieve site over the plan period It is unclear what is expected of the site	The respondent has usefully identified weakness in the current version of the Plan. Any review of the growth and development strategy needs to ensure that the Plan, along with its supporting documents (including a revised SEA, demonstrate that the strategy will achieve the strategic targets and the preferred site allocation policies are deliverable in a sustainable manner.
102	Historic England	<i>Overall, there is no doubt that the scale of development on the sites proposed will affect the strategic relationship which the historic character of the town has with its rural setting. There may be an unavoidable degree of inevitability about this and the exercise then becomes one of ensuring that harm is appropriately minimised and that design of new development reinforces distinctive local character. We acknowledge the difficulty which the community faces in determining those which represent the best site options taking into account the necessary statutory considerations. We also recognise that outside of the built up form of the town, designated heritage assets are thinly populated and impacts on individual locations are therefore probably likely to be relatively modest. At the same time, it is incumbent on the Plan preparation process to demonstrate that those impacts will in fact be modest and thereby acceptable. Section 4.3.3 of the SEA Report (p33) explains how decisions were made on the selection of the chosen sites but does not give any insight as to how the Neighbourhood Plan Steering Group understood and took account of the necessary heritage considerations. We would therefore recommend that in reviewing the pre-submission version of the Plan and its supporting evidence in</i>	Says it is unclear how heritage considerations have been taken into account As major development will affect relationship which the historic character of the town has with its rural setting, it recommends that this is made clear in any revised Plan how harm will be minimised and local character will be appropriately safeguarded	Consider whether the impact of growth and major development on the historic environment can be properly addressed within policies in the NP and the need for site-specific criteria

		<i>light of the Regulation 14 consultation feedback that these gaps are addressed before formal submission to Cornwall Council</i>		
105	Situ8 for Merriman Ltd	<p><i>Situ8 are concerned the preferred development strategy, which has been informed by the SEA is not based on robust evidence, and as a result the consideration of alternative approaches for the location of housing is not robust. The Gonvena Land was identified within the January 2017 consultation draft NP, as a preferred option for strategic growth and highlights the potential constraints of delivering the site and the issue that housing targets may not be met as a result of it not coming forward. Minutes, fail to address this issue nor do they provide a clear and concise explanation for the justification of the omission of the Gonvena Land from the housing site allocation in the Regulation 14 Pre-submission NP and conversely the allocation of land east of Bodieve. The SC and Town Council (TC) have failed to engage with our clients throughout the neighbourhood plan process and as the plan progressed. Furthermore, there appears to have been a lack of transparency. Situ8 are concerned that the NP process does not exemplar a collaborative approach to working and NP making. The SC and TC have not demonstrated how they have listened to and engaged with our client, nor have they been clear with what they have done and why. As a result, questions are raised as to whether the community as a whole are aware of how the NP has developed, and as a result understand why development is needed and where it can go?</i></p>	<p>Expresses concern that the strategy has changed from the 1<sup>st</sup> version of the NP without any clear explanation or rational justification for why Bodieve is now identified as the preferred strategic development site instead of land at Gonvena</p> <p>It questions the transparency of the process that arrived at this decision and whether it reflects the community's wishes</p>	Same as 101 above
107	Turley for Redrow Homes	<p><i>Draft Neighbourhood Plan Policy SD04 allocates Land east of Bodieve as mixed use development within the Plan. This area was originally identified as a direction for growth in the previous NP consultation document. A planning application for part of this allocation was refused outline permission for up to 450 dwellings in March 2017 (PA16/10942), the main reasons for refusal were:</i></p> <ul style="list-style-type: none"> <li><i>• The application site is not an allocated site for development and the scale of the proposed development is so substantial that it is considered that the granting of permission would prejudice the community-led Neighbourhood Plan process</i></li> <li><i>• The material considerations in respect to accessibility and landscape impacts are such that a departure from the development plan is not justified.</i></li> </ul>	<p>Questions the allocation of land east of Bodieve as mixed-use development in the light of the fact that it part of the site has recently been turned down for major residential development and reminds us of the several reasons why</p> <p>There is, it says, insufficient evidence to justify its allocation</p> <p>Says it is unclear what the expectations are for the Bodieve site in terms of overall scale and capacity either for dwellings or for the use or amount of employment</p>	Same as 101 above

		<ul style="list-style-type: none"> <li>• Due to the failure to demonstrate safe and suitable non-vehicular access from the site to Wadebridge across the A39 which would result in high reliance on private motor vehicles to access the services and facilities.</li> <li>• The absence of a mechanism to secure the provision of affordable housing, open space and contributions towards educational infrastructure.</li> </ul> <p>There is a lack of clarity in this policy with regard to the capacity of Bodieve</p> <p>Within the supportive text of para. 9.26 it states that the site may meet the housing targets to 2034 which is beyond the plan period (2030).</p> <p>The Neighbourhood Plan does not allocate any specific sites for employment growth. The Local Plan states that Neighbourhood Plans should deliver employment provision however; the NP does not allocate any specific sites for employment growth, despite community support. The Bodieve site is allocated to include a zone for business development however; it does not specify a use or amount of employment that should be provided and therefore it is unclear as to whether this site will deliver any employment development, or how this fits into the viability and deliverability of any comprehensive proposals.</p> <p>Overall, this policy does not provide enough evidence that development on this site would be acceptable and appropriate.</p>		
110	Cllr McHugh (CC)	Encourages the inclusion of site 24 in the Plan as an area not suitable for development	Seeks to protect the separate identity of the hamlet of Bodieve by leaving a green buffer	Same as 100 above
112	Heynes Planning for Progress Land Ltd	<p>The site at draft Policy SD04 is of a similar size and scale as our Client's site and has the ability to deliver a similar quantum of development. That site is covered, in part, by three assessments in the SEA in Tables 4.6, 7 and 8. (NB Table 4.6 has been incorrectly labelled as 4.1 in the SEA).</p> <p>Noting the extent of the sites it appears that some of that draft allocated site has not been the subject of the SEA. Therefore, in our view, the understanding of that site and its impact (i.e. draft Policy SD04) has been significantly understated. Compared to our Client's site, overall, in our view it is less sustainable in locational terms, has greater visual impact, has significant highway and transport constraints at Ball Roundabout, has foul sewer connection issues and is mostly grade 2 best and most versatile land quality as set out in the SEA. Landscape and visual impact and impact on agricultural land are two areas where our Client's site performs significantly better in our view.</p>	<p>Objects to land east of Bodieve being allocated in the Plan, and suggests that the church Park site is "better suited to meeting local needs in a sustainable manner"</p> <p>Suggests that the full impact of major development on land east of Bodieve has not been taken into account</p> <p>Questions the robustness of the SEA in considering and comparing the impacts with other options</p> <p>Points out that the highway implications remain a matter of major concern to the Highways Authority and resolving them may affect the viability of the proposed development</p>	Same as 101 above

		<p><i>As stated earlier this site has been the subject of a planning application previously which has been refused, Council Ref: PA16/10942 with the Council expressing a significant number of concerns in the Decision Notice. The applicant has since undertaken a pre-application enquiry within the context of a Planning Performance Agreement with the Council under the (Council) reference PA17/01943/PREAPP.</i></p> <p><i>This enquiry relates to a development proposal for part of the site covered by draft Policy SD04.</i></p> <p><i>It appears from reviewing the documentation in relation to the pre-application enquiry that no formal response was given to the applicant. However, the advice presented by the highways officer (see attachment – doc 4) suggests that highway matters had not been resolved and a significant number of concerns were raised.</i></p> <p><i>Clearly there are a number of fundamental highway issues affecting delivery of the development proposed under draft Policy SD04. It should also be noted that the concerns expressed relate to a proposal for only PART of the site covered by draft Policy SD04.</i></p> <p><i>Concerns therefore have to be expressed as to the ability of the whole of the development under draft Policy SD04 to come forward in respect of a there being a satisfactory highway solution being established. Viability must also be a concern given the significant amount of highway-related infrastructure that is likely to be required.</i></p> <p><i>We therefore object to the inclusion of the site identified as draft Policy SD04 as there is an alternative development that is better suited to meeting local needs in a sustainable manner and that is our Client's site at Higher Church Park. That site should be included as an alternative to the site at Bodieve.</i></p>		
193	Devon and Cornwall Police	<p><i>I note and very much welcome the included comments relating any new development at Bodieve which should provide safe and accessible environments where crime and disorder, and the fear of crime, does not undermine quality of life or community cohesion</i></p> <p><i>My only thought is, unless I have misread I, that this appears just to relate to development at Bodieve only and not the wider Wadebridge area also.</i></p>	<p>Points out that the only reference to providing safe and accessible environments is made for the Bodieve site</p> <p>Wants a similar consideration to be included in other appropriate development policies in the NP</p>	<p>Signpost or make it a requirement to take 'designing out crime' fully into account</p>
222	Cornwall Council Transport	<p><i>The community feedback suggests that new development should be within the by-pass if possible, yet a major development site is being proposed to the north of the A39 (SD04).</i></p>	<p>Questions how this policy can be reconciled with the expressed view of the community that new development should be</p>	<p>The significance of the by-pass as a physical boundary should be taken fully into account whilst reviewing the overall</p>

			within the by-pass if possible	growth strategy and the identification or allocation of areas for development
222	Cornwall Council	<i>9.26 – a map giving context to this should be added (i.e. including the roads referred to and Ball Roundabout).</i>	Requests a context map annotated to show locations and roads mentioned in the supporting text	Consider including a context map
222	Cornwall Council	<i>9.29 – as above, a map would greatly improve the document users understanding.</i>	Requests a context map annotated to show locations and roads mentioned in the supporting text	Consider including a context map
222	Cornwall Council	<i>9.29 – it would be useful to say, at the end of this paragraph, what the NDP policies for the Wadebridge Football Club site and the land adjacent to the former Council Offices propose (as you have for the site at Trevilling, where you reference NDP policy TR04).</i>	Suggests additional text at the end of the paragraph to connect this policy with other policies in the Plan	Ensure that there are sufficient cross-references to other policies in the Plan to help set the full context
222	Cornwall Council	<i>9.30 – for info, in Cornwall’s Site Allocations Development Plan Document, a site which would deliver less than 2,000sqm is not considered to be of a significant enough scale to be classed as a Strategic Employment Site Allocation (the Cornwall Employment Land Review 2010 sets out that 1ha. of land can be assumed to deliver 4,000sqm of employment space (either industrial or office) and, following means testing by the Council in 2016, this assumption is considered to remain a robust position for Cornwall).</i>	Confirms that sites of more than 0.5ha. are considered to be part of the Strategic Employment Site Allocation	Acknowledge point
222	Cornwall Council	<i>9.30 – ‘It is calculated that an areas of about 10 hectares...’ - a signpost to where this calculation (or the addition of a small inset table setting this calculation out) would be useful.</i>	For clarity, requests an explanation or reference to how this calculation was made	Ensure that all targets and thresholds are properly explained and justified
222	Cornwall Council	<i>9.30 – There is reference to Policy SD04 but this para doesn’t say what it does (although it is implied it allocates employment land near Ball Roundabout). Whilst this is set out in para 9.31, it would be better if it was referred to here at the first reference.</i>	Requests a more direct reference in this paragraph to the intention of the policy as it relates to the allocation of employment land	Ensure that the required allocation of employment land is adequately defined
222	Cornwall Council	<i>On Map G, it looks as though there is existing built development within this site. For all site allocation policies, it would be good to briefly acknowledge, in the supporting text, what the current land uses are.</i>	Suggests that reference is made to the current land uses on the site	Acknowledge the current use of land that is allocated in the Plan
222	Cornwall Council	<i>Policy SD04 – include reference to what the site area is (in hectares) and the amount of housing and employment anticipated to be delivered within any future development here.</i>	For clarity, requests the inclusion of the site area and the amount of housing and employment expected to be delivered	Include site areas and the amount of housing and employment expected to be delivered for all allocated sites
222	Cornwall Council	<i>Policy SD04 – it’s important that policy wording sets out clearly what is meant and intended, where this relies on supporting information a signpost to where this additional information is set out should be included and referred to in</i>	Suggests that the policy needs a thorough review to ensure it is clear what is expected and sufficient explanation or signposting	Site-specific criteria need to be reconsidered as part of an overall review of the growth and development strategy

		<i>the supporting text of the policy - What is 'high quality design and unique character'? Could a 'unique character' risk being out of keeping with the existing character of the area? What are high standards of sustainable living? Primarily serves identifiable local needs, does this mean affordable led? Foster and facilitate? What are the principles of accessibility for all? This policy and its supporting text (and evidence) would benefit from a review to ensure what is intended is more clearly set out.</i>	to guidance is included in the supporting text	
222	Cornwall Council	<i>Policy SD04 – Criteria (vi) 'include a zone for business development'. How much land should this zone cover? As employment use is usually low value, developers will likely seek to provide for a minimal zone. If the intention is that this zone should be for in the region of 10 hectares, this should be included in the policy wording to inform policy users. NB Para 173 of the NPPF says that Plans should be deliverable and that sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. This will be a key consideration in regards to this policy and an area where future challenge may occur. It's important therefore that your supporting text signposts the document user to an area, within your separate evidence base, that sets out that this policy proposal is considered deliverable. Government guidance around viability can be found at <a href="#">(weblink provided)</a></i>	Advises that the policy should include reference to the scale of business development proposed to ensure that it is minimised by the developer Recommends that deliverability and viability checks are carried out before any figure is included	Site-specific criteria need to be reconsidered as part of an overall review of the growth and development strategy
222	Cornwall Council	<i>Policy SD04 – Criteria (vii) can be deleted as this will be picked up by higher level policies and existing procedures.</i>	Says that criterion vii can be removed as it is covered by higher level policies and procedures	Site-specific criteria need to be reconsidered as part of an overall review of the growth and development strategy
222	Cornwall Council	<i>Policy SD04, there is an assumption that phasing will be required. Consider rewording to "Development proposals should be subject to a comprehensive masterplan. Where appropriate, this should set out the proposed 'phasing' (expected completion years for different aspects of the development), taking into account the capacity of local infrastructure to meet residents' needs."</i>	Suggests a re-wording is necessary as phasing will be necessary	Site-specific criteria need to be reconsidered as part of an overall review of the growth and development strategy
251	Natural England	<i>We have serious concerns about this policy. The policy allocates a large area for mixed use development and is located within the Impact Risk Zones for Amble Marshes SSSI and River Camel SAC / River Camel Valley SSSI. The allocation should be supported by an assessment of the potential impact of the proposed development on these nationally and internationally protected sites and specific</i>	Expresses serious concerns about the policy, which suggests it is concerned about major development on land east of Bodieve It reminds that the land is within the impact zone of SSSIs and adjacent to the AONB	The respondent has usefully identified weakness in the current version of the Plan. Any review of the growth and development strategy needs to ensure that it can be demonstrated that policies allocating



		<i>policy criteria relating to mitigating any impacts on these designations, e.g. impacts on water quality, should be included. The site is also immediately adjacent to the AONB. The plan acknowledges that the allocation 'presents a significant challenge to achieve a development that is appropriately integrated into the landscape', which is reiterated in the SEA. No site-specific landscape evidence could be found. The policy contains a policy criterion pertaining to landscape. We have serious concerns about this policy.</i>	It requests a site-specific landscape assessment is undertaken and location-specific criteria within any policy	sites for development have adequately taken into account ecological impact and landscape character and site-specific criteria are included in the policies to ensure any adverse impact is minimised or mitigated
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### *Summary Conclusion*

The current version of policy SD04 came about as a response to the reaction received to the growth strategy proposed in the 1st Consultation Version of the Neighbourhood Plan. It was recognised that in changing the strategy from one that was based on containment within the by-pass boundary during the plan period, to one that allocated a substantial area of land for development outside of this physical barrier, was likely to have opposition locally. This has proven to be the case. It should be noted however that not all community respondents are opposed to the principle of developing housing on and to the east of Bodieve.

The divisive impact of trying to accommodate the Local Plan target, is fully exposed by the community comments received about policy SD04. The policy presented in the Plan reflects the conclusions of the assessments and subsequent debate that was held by the three councils before the Pre-Submission Version of the Plan was published. Much of that debate is reflected within the 65 community comments. Sixteen respondents have submitted a pre-prepared case against the development of 'land east of Bodieve' that sets out the several planning and development issues as described by those leading the campaign against the earmarking of this land. A further 22 respondents have expressed opposition to the potential development of 'land east of Bodieve' and given their own reasons. It should be noted that there are 13 community submissions that express support for the policy in a relatively unqualified manner.

The contributions from the 'development industry' is plainly influenced by their particular land/site interests. It is also clear however, from the views that they have expressed, that the Pre-submission Version of the Plan has failed to demonstrate adequately and clearly how the preferred strategy will achieve the strategic targets and how the preferred site allocation policies are considered deliverable in a sustainable manner. Any review of the growth and development strategy needs to ensure that the Plan, along with its supporting documents, addresses this disconnect between the policies and the evidence-base presented (including the SEA). To fail to provide an adequate and convincing audit trail is likely to result in continued objection from the 'industry' as the Plan goes forward; and conclude with expensive and time-consuming hearings.

Historic England and Natural England have expressed concerns that policy SD04 in the Plan are not adequately supported by evidence that impact on the character of the surrounding area has been considered and adequately protected by site-specific criteria.

Cornwall Council is most concerned about clarity. All site allocation policies should have clearly understandable and justifiable criteria and be supported with adequate context and evidence-based justification and explanation.

### *Policy SD05 Local Character*

*Development proposals should:*

- i. respect and relate to local character;*
- ii. utilise sustainable building techniques and materials; and*
- iii. include the use of locally appropriate materials wherever possible.*

*Development proposals will be supported where they achieve all of the following:*

- a) protect, conserve and enhance the natural, built and historic environment;*

- b) *protect, conserve or enhance the setting and most typical or characteristic public views of landscapes and townscapes;*
- c) *minimise the loss of trees and hedgerows;*
- d) *incorporate features connected with sustainable design; and*
- e) *meet all other policy requirements in the Plan.*

<b>No.</b>	<b>From:</b>	<b>Summary of Comment</b>	<b>Planning reasons and other relevant comments (consultant's interpretation)</b>	<b>Consultant's Suggestions</b>
111	Name withheld	<i>Does not want to see any more developments like Bradfords Quay</i>	Does not want to see any more developments like Bradford Quays, which is out of keeping with the town	Note concern
205	Name withheld	<i>Avoid standard housing solutions</i>	Wants future development to have the same randomness and variety of styles that has given Wadebridge its charm	Consider whether it would help to explain in more detail what contributes to the essential character of the built environment and ensure that it is understood that a degree of variety and innovation is acceptable
222	Cornwall Council	<i>9.32 – 9.34 – Policy SD05 applies to your whole neighbourhood area. Does your evidence base also include reference to CCs Landscape Character Area Descriptions; have these informed the policy at all (especially in relation to the area outside of Wadebridge Conservation Area)? The following three Landscape Character Areas are relevant to your NDP area (links to each of the Landscape Character Area documents are provided in brackets): Camel Estuary Landscape Character Area Camel &amp; Allen Valleys Landscape Character Area St Breock Downs Landscape Character Area (weblinks provided)</i>	Suggests that reference is made to source documents regarding various character areas and the differences between them	Include reference within the supporting text to the variations between character areas and how this should be taken into account by reference to the LPA's Landscape Character Area documents
222	Cornwall Council	<i>Policy SD05 - consider rewording the policy so that the onus is on the developer to demonstrate how these requirements have been met, for instance: 1. Planning applications should demonstrate how development proposals: (i) respect and relate to local character; (ii) will utilise sustainable building techniques and materials; (iii) will include the use of locally appropriate materials, wherever possible; (iv) will protect, conserve and enhance the natural, built and historic environment; (v) will protect, conserve or enhance the setting and most typical or characteristic public views of landscapes and townscapes;</i>	Suggests that the policy is re-worded to place the onus on the developer to demonstrate how the proposal meets the criteria of the policy Also suggests that a criterion that requires the proposal to "meet all other policy requirements in the Plan" is unnecessary, as all relevant policies in the plan would apply to all development proposals	Reword policy as suggested by the LPA

		<p><i>(vi) will minimise the loss of trees and hedgerows; and,</i></p> <p><i>(vii) incorporate features connected with sustainable design”.</i></p> <p><i>Please note the criteria ‘meet all other policy requirements in the Plan’ is not include as this is unnecessary.</i></p> <p><i>Please also note, it’s recommended that criteria (v) above is reviewed as this requirement is not very clear to understand.</i></p>		
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#### *Summary Conclusion*

There is little objection or criticism of draft policy SD05 and no reaction at all to it from the ‘development industry’. This may be because, as pointed out by Cornwall Council, the policy as presently drafted does not sufficiently place the onus on the developer to demonstrate how the policy requirements have been met. The local planning authority suggests that the policy could be reworded. It is also suggested that more explanation is provided as to what are the essential aspects of the area’s character and how it varies between locations, which should be taken into account and safeguarded.

## Section 10 Natural Environment

### General

No.	From:	Summary of Comment	Planning reasons and other relevant comments (consultant's interpretation)	Consultant's Suggestions
147	Name withheld	<i>Farmland should be protected</i>	Need to recognise where the best farmland is. Considers farmland is vital to our future as growing food is a priority	Consider whether the value of farming land and its contribution to the character of the local countryside needs mentioning
187	Environment Agency	<i>10.6 – The chapter can be expanded to develop a hierarchy of environmental protection and enhancement. An example could be: A- Retain existing natural resource as a baseline. B- Buffer existing habitats from effects of climate change or disturbance. C- Seek opportunities or provide support to proposed large scale habitat restoration or environmental improvement schemes that provide links to existing habitats or improved degraded resource. D- Seek to protect previously degraded habitats and protect them from permanent loss.</i>	Suggests the Plan could embrace a “hierarchy of environmental protection and enhancement” and gives an example of how it could provide context for the natural environment policies	Consider the value in applying such a hierarchy to provide further context to the Natural Environment policies
187	Environment Agency	<i>10.9 – <b>spelling – not Giant Bullhead – just Bullhead.</b></i>	Appreciate the incorrect name being pointed out	Amend word in last line of para.
203	Scott Mann MP	<i>Provide a grant for farmers to keep slurry away from water courses</i>	Expresses need for better water quality and improved land management	Not a NP matter refer to TC
222	Cornwall Council Forestry	<i>There is little or no reference to trees and hedges. It is important to include habitat, biodiversity and ecology as part of a Neighbourhood Plan, of which trees and hedges are an important factor. I have attached the Council's Neighbourhood Planning document specific to Wildlife, Trees and Woodland which you may wish to incorporate in the revised document.</i>	Would like more reference in the NP to trees and hedges because of their habitat, biodiversity and ecology value.	Consider how to incorporate advice given in CC's Neighbourhood Planning document specific to Wildlife, Trees and Woodland appropriately, either as part of an over-arching statement, or as a facet of a specific policy.
222	Cornwall Council	<i>10.5 - Again, the document would be improved by the introduction of inset maps highlighting the areas discussed.</i>	Suggests that a map showing locations mentioned in the Plan might be a helpful addition	Such a map may help document users' understanding and interpretation
222	Cornwall Council	<i>Footnotes 16 and 17 (and elsewhere through your document) – where you refer to evidence base documents that have informed your NDP, links to these should be provided on your online evidence base resource and the signpost should be to this (your website). This will make future document use easier, as the document user can find all evidence sources in one location on your website. The presentation of evidence is important both now and through the life of your plan.</i>	Suggests more weblinks to make future document use easier, as the document user can find all evidence sources in one location on your website. Says the presentation of evidence is important both now and through the life of your plan.	Consider how best to accommodate this request. Probably simplest to add reference and link to the website where all the documents and the story can be set out in a logical and accessible order.
222	Cornwall Council	<i>10.9 – you refer to your evidence base but this is a very broad reference. When reading this for the first time, questions</i>	Makes point again about providing more links to	Take note of comment and ensure relevant

		<i>such as where is the SAC and where are the SSSIs are raised and the signpost isn't clear. Your online evidence base does, however, include good evidence base documents but your NDP currently fails to signpost the reader to these. In this instance a clear signpost (possibly as a footnote) 'Please see the 'WANP Evidence Report – Natural Environment', at <a href="http://www.wadebridge-tc.gov.uk/nhp/148-reference-documents.html">http://www.wadebridge-tc.gov.uk/nhp/148-reference-documents.html</a> for further details' would be recommended.</i>	support and explain references in the text	footnotes and all weblinks are included
222	Cornwall Council	<i>Linked to above, your evidence base has a number of WANP Evidence Reports listed, however these aren't directly referenced from your NDP and so are unlikely to be accessed by document users. It would be worth checking that each of these is signposted as their content is likely to be relevant to your plan.</i>	Makes point again about providing more links to support and explain references in the text	Take note of comment and ensure relevant footnotes and all weblinks are included
222	Cornwall Council	<i>10.10 – consider briefly mentioning the SEA that has been carried out (and include a signpost to this).</i>	Suggests making reference to the fact that a SEA has been carried out (with a weblink)	Consider whether making such a reference would be helpful at this place in the Plan

### Summary Conclusion

In several cases the respondent has helpfully suggested that a little more emphasis could be made in the introductory section about aspects such as farming's contribution and trees and hedges. The Environment Agency has suggested that the Plan adopts a "hierarchy of environmental protection and enhancement", which may provide added context and justification for the policies in this section. It has provided guidance on this matter. Cornwall Council has requested improved links to the background evidence.

### Policies

#### Policy NE01 Protection of the Natural Environment

*The highest level of protection will be given to sites of European and/or national importance within the area.*

*Development proposals having an adverse impact on the integrity of such sites will not be permitted, other than in exceptional circumstances. Measures to avoid any adverse impacts on these sites will be sought as a first principle.*

*Where mitigating measures are required for development to be acceptable within its setting, they should include the use of planting which will help enrich the biodiversity of the area.*

No.	From:	Summary of Comment	Planning reasons and other relevant comments (consultant's interpretation)	Consultant's Suggestions
222	Cornwall Council	<i>10.12 – as above. Abbreviations of SAC and SSSI should be defined at the first occurrence in the NDP, i.e., at 10.9.</i>	Suggests that abbreviations are explained earlier	Makes sense and would be consistent
222	Cornwall Council	<i>Policy NE01 – this policy should be deleted as it doesn't add anything to higher level policies. European and National designations already benefit from significant levels of protection and a European Sites Supplementary Planning Document is being produced by CC. It's noted that reference is made to planting; if there this is an issue that the community would like to look at in greater detail please first refer to CC's Biodiversity Development Plan Document, which also includes a list of native species to help inform appropriate planting schemes.</i>	Points out that sites of European and/or national importance are already protected. Suggests that the policy should be deleted as it adds nothing. It does however refer to a source of information on native species. Presumably in case the policy is extend in scope or refocuses on mitigation.	Consider whether to delete the policy as suggested by the local planning authority

187	Environment Agency	<i>10.12 – Marine Conservation Zones (MCZ). MCZs protect areas that are important to conserve the diversity of nationally rare, threatened and representative marine habitats and species. Designation of these zones considers social and economic factors, alongside the best available scientific evidence. 27 MCZs were 'designated' in 2013 (Tranche 1) and 23 in January 2016 (Tranche 2). The 'recommended' Tranche 3 MCZs are likely to go out to public consultation in late 2018; at that point, they will become 'candidate' sites. Wadebridge may be included in this 3rd Tranche. The NP can support this process.</i>	Confirms that Wadebridge is being considered for a Marine Conservation Zone when the 3 <sup>rd</sup> tranche are consulted on during 2018. It suggests that the NP (specifically para. 10.12) could make reference to this possibility and “support this process”	What is meant by “support this process” is unclear. Need to establish the position at the time of preparing the Submission Version of the NP. The latest situation on MCZ, if relevant to Wadebridge, could be referred to at an appropriate place
251	Natural England	<i>We welcome this policy and the last sentence of the policy which requires biodiversity enhancements to be delivered. We recommend that you add the words 'or other measures' after 'planting', as planting may not be appropriate in all circumstances.</i>	Supports the policy and suggests a minor amendment because measures other than planting may be appropriate as mitigation in some instances	Add ‘or other measures’ after ‘planting’ to the policy if it remains in the NP

### Summary Conclusion

Whilst Cornwall Council suggests that the policy should be deleted as it adds nothing, it does also attract some positive/constructive comments from the Council together with the Environment Agency and Natural England. It should be possible to use the current draft policy as the basis of a revised policy that will accommodate the suggestions received.

There is no response and certainly nothing negative from community sources or the ‘development industry’.

### Policy NE02 Areas of Ecological Significance

*The following areas (listed below and identified on inset Map J) are designated as being ‘areas of local ecological significance’ and should be protected from development and the impact of development:*

- A. Treraven Meadows
- B. Walmsley Bird Sanctuary
- C. Clapper Marshes
- D. Hawkes Wood
- E. Colquite to Dunmere Woods
- F. Hustyn to Grogley Woods
- G. Croan Wood
- H. Kestle Wood

*Development proposals that may affect ‘areas of ecological significance’ will only be supported where:*

- i. *there are no adverse impacts on the local ecology; or*
- ii. *if such impacts are unavoidable, they can be satisfactorily mitigated; and*
- iii. *if mitigation is required, new additional local areas of ecological significance are created or other existing ones enhanced and agreements made to ensure their future management and maintenance.*

No.	From:	Summary of Comment	Planning reasons and other relevant comments (consultant’s interpretation)	Consultant’s Suggestions
20	Name withheld	<i>Supports policy</i>	Support noted	No change required
222	Cornwall Council	<i>10.13 – typo, The NPPF</i>	Appreciate the typo being pointed out	Capitalise the first word of para. 10.13
222	Cornwall Council	<i>consistent term should be applied throughout ‘Areas of Local Ecological Significance’, (in policy title and throughout the wording)</i>	Calls for consistency in the use of terminology to aid clarity and interpretation	Check to ensure that the Plan is consistent in the use of terminology



222	Cornwall Council	<i>Map J – as with all maps, please review to ensure the document user can easily see the detail required. It may be that it is more appropriate to present these sites on a series of maps, rather than one; if so, consider presenting these within an appendix.</i>	Wants to see a clearer easier to read map	Consider how and where maps can be made clearer
187	Env. Agency	<i>10.13 – BAP Species and Habitats has been superseded by the Natural Environment and Rural Communities act NERC act – They become Priority Species and Habitats and are afforded statutory protection.</i>	Points out that reference to BAP habitats may now be out of date	Check status of areas referred to and amend supporting text accordingly
251	Natural England	<i>We understand that this policy includes the locally designated Local Wildlife Sites and other sites. We welcome the intent of this policy, but we would like to point out that this policy is less robust in the protection of Local Wildlife Sites than policy 23.3 (c) of the overarching Cornwall Local Plan. We recommend that you discuss this issue with planners at Cornwall Council and that you review the wording of policy NE02.</i>	Suggests that this policy is “less robust” than Policy 23 of the Local Plan	Consider whether policy is necessary, what it is seeking to add to the LP and whether it needs to be strengthened

### Summary Conclusion

It seems that the community is generally satisfied with the policy and its intentions. Significant, but potentially conflicting, comments have been received from Cornwall Council and Natural England. Cornwall Council seems to be content with the policy and makes a few suggestions as to how it can be better presented. Natural England however question the worth of the policy, as it seems to be less robust in the protection of Local Wildlife Sites than the policy in the Local Plan. A discussion with both parties might be a useful next step.

### Policy NE03 Protection of Landscape Character

*Development should be of a scale, mass and design that reflects local landscape character. In particular, where appropriate, development should seek to:*

- i. maintain and restore Cornish hedges, stone walls, hedgerows and other boundary features whilst respecting the varying pattern of ancient field systems;*
- ii. protect against insensitive development/alterations impact on rural character, ensuring that the massing and materials of the development cause minimal negative impact; and*
- iii. include the use of locally appropriate materials;*
- iv. ensuring that views and vistas are maintained; and v. prevent visually intrusive skyline development.*

No.	From:	Summary of Comment	Planning reasons and other relevant comments (consultant's interpretation)	Consultant's Suggestions
20	Name withheld	<i>Supports policy</i>	Support noted	No change required
54	Name withheld	<i>Supports policy</i>	Support noted	No change required
222	Cornwall Council	<i>Policy NE03 – Consider reviewing the document structure so that this policy is presented alongside Policy SD05 and Paras 9.32 – 9.34. Consider also any potential to amalgamate the two?</i>	Believes it would be more logical place this policy after policy SD05 relating to character or merging the two policies	Consider whether the policy should be re-located in the next version of the Plan
222	Cornwall Council	<i>Policy NE03 – First sentence repeats Local Plan Policy wording, so it's recommended that this is deleted, together with text saying 'In particular'.</i>	Suggests that first sentence of policy and are deleted as it only repeats Local Plan Policy wording The following two words would then be unnecessary	Consider deleting the first sentence and other words as suggested

251	Natural England	<i>We welcome this policy, but we recommend that the policy makes reference to the AONB and Areas of Great Landscape Value (AGLV) and that map K shows not only landscape character areas but also the AONB and the AGLV.</i>	Wishes to see reference in the text and on the map to the existence to the AONB and AGLV	Make reference to the existence to the AONB and AGLV in the policy and on the accompanying map
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#### *Summary Conclusion*

It seems that the community is content with the policy and its intentions. Significant comments have been received from both Cornwall Council and Natural England. The implication of these comments is that policy NE03 is acceptable, but the policy and its presentation would benefit from adjustment.

#### *Policy NE04 Nesting Boxes*

*New developments will be required to provide one nest box or nest brick for swifts on every dwelling and other appropriate building that has an eaves height of 5m or more. Nest boxes for barn owls should be installed during the conversion of any barn or other derelict agricultural building that is 1km or more from main roads.*

No.	From:	Summary of Comment	Planning reasons and other relevant comments (consultant's interpretation)	Consultant's Suggestions
190	Stride Treglown for Chaddlewood Investment Ltd	<i>whilst the thrust of this policy is understood and considered important it is questionable as whether the requirement to include a swift nest box or brick on every new dwelling will be appropriate in every instance. In the majority of cases, planning applications for new homes will be supported by an ecological assessment which will include recommendations in respect of biodiversity enhancement. Biodiversity enhancements should be tailored to the individual site situation and the requirement of Policy NE04 may be considered too prescriptive.</i>	Questions whether a swift box is necessary on every new dwelling and suggests this should only be a requirement if it is specified as part of a set of biodiversity enhancements specifically -tailored to the individual site	Review policy in the light of this comment and the conditional support expressed by Natural England at 251 below
203	Scott Mann MP	<i>Delighted to see the inclusion of swift boxes</i>	Support noted	No change required
251	Natural England	<i>We welcome this policy. We recommend that it is made clear in the plan that the nest box or nest brick to be provided is an additional requirement and would not generally remove the need for developers to protect and enhance biodiversity in accordance with the NPPF and the adopted Local Plan.</i>	Welcomes policy but wishes it to be made clear that the provision of a swift box or brick per property and does not remove the need for further biodiversity enhancements that may be required	Address concern that this may be misinterpreted by reviewing wording of policy and or supporting text

#### *Summary Conclusion*

It seems that the community is content with the policy and its intentions. Significant comments have been received from a developer's representative and Natural England reflecting two different perspectives on the matter. There is no objection to swift boxes being provided on most properties in new developments. The developer's view is that it may not be appropriate for all buildings in all locations. Natural England is concerned to ensure that developers recognise that this policy requirement is in addition to any other biodiversity enhancements required in accordance with the NPPF and the Local Plan. A minor adjustment to the policy wording should satisfactorily deal with the concerns expressed.

#### *Policy NE05 Wildlife Corridors*

*Development proposals effecting wildlife corridors will require an ecological assessment to ensure measures are taken to protect local ecology and, where necessary, mitigation to provide a net gain in biodiversity. Opportunities to create new wildlife corridors into, through and between housing developments, linking to adjacent corridors and wherever possible out into open countryside should be an important design and layout consideration. Development proposals that fail to make adequate provision will not be supported.*



No.	From:	Summary of Comment	Planning reasons and other relevant comments (consultant's interpretation)	Consultant's Suggestions
178	Name withheld	<i>Supports policy</i>	Support noted	No change required
222	Cornwall Council	<i>10.21 – these areas should be illustrated on an accompanying map.</i>	Repeats a call for a map showing all locations mentioned in the Plan	Seems a good idea if the detail does not confuse – the purpose of the map is to clarify things
222	Cornwall Council	<i>Policy NE05 – similar to comment re policy SD05, consider rewording the policy so that the onus is on the developer to demonstrate how these requirements have been met. The NDP needs to clearly set out the wildlife corridors that this policy wording refers to (including on a map) so that all document users understand these.</i>	Wants additional words in the policy to put the onus on the developer to demonstrate how the policy requirements are met. Also suggests that map showing the wildlife corridors relevant to the policy would provide clarity as to the areas concerned.	Consider additional wording to accommodate request from CC Include a map to indicate the relevant wildlife corridors
251	Natural England	<i>We welcome this policy. It would be useful to set out how potential developers would know whether their proposal would be a development proposal affecting wildlife corridors.</i>	Asks for the NP to indicate how developers will be sure where the wildlife corridors area and the relationship with their development	Consider what is the best way to indicate the relevant wildlife corridors Discuss with NE

#### Summary Conclusion

It seems that the community is content with the policy and its intentions. Significant comments have been received from both Cornwall Council and Natural England. Both point out that some way of better indicating the wildlife corridors would help the policy's interpretation. Cornwall Council has also requested additional wording to place an onus on developers to demonstrate how they comply with the policy. These matters can be addressed in part by additional wording in the policy and a reference for developers to a source of information on local wildlife corridors.

#### Policy NE06 Camel Trail

*Proposals for improvements and new access routes to the Camel Trail, including a link across the River Camel from Sladesbridge, and new walking and cycling routes readily accessible from Wadebridge will be supported.*

No.	From:	Summary of Comment	Planning reasons and other relevant comments (consultant's interpretation)	Consultant's Suggestions
14	Name withheld	<i>More attention and signage for Camel Trail</i>	Wishes to see better maintenance and management (by way of signage) of the Camel Trail	This is not an NP matter – should be referred to the TC and CC
47	Name withheld	<i>Concern about expense and impact on Egloshayle Road</i>	Fears bridge would encourage cyclists to return to Wadebridge via Egloshayle Road, which is already congested	Note concern about possible implications for Egloshayle Road – consider making reference to addressing management issues as part of any development proposals for the Camel Trail
69	Name withheld	<i>Support idea of bridge</i>	Support for bridge for cyclists and pedestrians	No change required
178	Name withheld	<i>Supports policy</i>	Support noted	No change required
191	Name withheld	<i>Opposes path to Hingham Mill being turned into a cycle path</i>	Wants the path in question retained for walking only; it is valuable cycle-free	Need to recognise the need to minimise conflicts between users,

			path for dog-walkers now green space and farmland requires dogs to be on leads	such as safe shared paths Consider the policy implications
210	Name withheld	<i>Tunnel suggestion</i>	Suggests a tunnel be constructed under the road at the west end of the bridge	This is a suggestion that is not precluded by the current policy It would need to be the subject of a feasibility study, which will take some time and money to carry out Suggest the idea is referred to the Town Council
203	Scott Mann MP	<i>Including a cycleway to Sladesbridge is welcomed</i>	Support noted	No change required

#### *Summary Conclusion*

The community is generally happy with a policy that supports further improvements and extensions to the walking and cycling network in the area, including a better link to Sladesbridge.

A few people feel that the consequences of encouraging a greater number of cyclists on local roads and destinations needs to be taken more into account, and perhaps not all routes should be dominated by cyclists. Perhaps a caveat could be included in the policy to deal with this matter.

#### *Policy NE07 Local Green Space*

*The following areas (listed below and identified on inset Map L) are designated as Local Green Spaces where new development is ruled out, other than in very special circumstances:*

- A. Burlawn Playing Field*
- B. Land rear of Queen's Park*
- C. Talmena Avenue Play Area*
- D. Trenant Vale*
- E. Trevanion Close*

<b>No.</b>	<b>From:</b>	<b>Summary of Comment</b>	<b>Planning reasons and other relevant comments (consultant's interpretation)</b>	<b>Consultant's Suggestions</b>
27	Name withheld	<i>Suggests adding additional area of land to LGS D</i>	Wants to see additional area of woodland added to designated local green space at Trenant Vale (site D on map) as it is an integral part of the area	Review the area of Trenant Vale that is designated and the suggested extension to ensure the area of land described on the policy map is worthy of designation as local green space and meets the required criteria in the NPPF (para. 100)
79	Name withheld	<i>Wad13 (E) should not have been omitted</i>	Wants to see local green space at Trenant Vale (site D on map) extended Believes that the playing fields should also be designated as a 'local green space'	Review the area of Trenant Vale as per No. 27 Note that Playing Fields are protected for their recreation value by policy SR01 – this provides stronger protection for the uses that are enjoyed on it
80	Name withheld	<i>Wad13 (E) should not have been omitted</i>	Wants to see local green space at Trenant Vale (site D on map) extended	Review the area of Trenant Vale as per No. 27

			Believes that the playing fields should also be designated as a 'local green space'	Note that Playing Fields are protected for their recreation value by policy SR01 – this provides stronger protection for the uses that are enjoyed on it
176	Name withheld	<i>Supports LGS for green spaces especially Trenant Vale</i>	Support noted	No change required
178	Name withheld	<i>Supports policy</i>	Support noted	No change required
198	Name withheld	<i>Supports designated LGS</i>	Support noted	No change required
209	Name withheld	<i>Observations on LGS</i>	Questions the level of use of these spaces and wants the Plan to provide empirical data to justify LGS designation	The selection of the designated local green spaces was based on an assessment that considered several factors. Recognising the level and type of use by people was part of that assessment, although it could not be quantified. Visual evidence and local testimony were used. No change required to Plan but reference to a supporting technical report would help.
235	Name withheld	<i>Areas are small</i>	Remarks that the areas to be protected are much smaller than the areas allocated for development Asks if green space could be incorporated in the Trevarner development area	Note first comment but no change required as sites have to meet NPPF criteria LGS can only apply to existing areas. Consider whether it is worth mentioning the potential relationship between the site allocated under policy SD03 (map D) and the Trenant Vale LGS
190	Stride Treglown for Chaddlewood Investment Ltd	<i>the designation of Trenant Vale as shown on inset Map L as Local Green Space is supported.</i>	Support noted	No change required
222	Cornwall Council	<i>Footnote 31 refers to the 'Local Green Space Site Assessment Report' but there is no document with this title at the link provided.</i>	Rightly points out that the LGS report is not on the website where the link takes you to	Remedy the weblink to take the reader to the location of the LGS report
222	Cornwall Council	<i>10.29 – these areas need to be clearly identified on a map/maps (Map I is too small scale and also consider legibility if printed in black and white).</i>	Wants a larger scale map included	Consider the request as part of an overall review of maps and how they should be presented in the Plan

### Summary Conclusion

The response has been very positive to the policy and the areas it is proposed to designate as local green spaces. The only 'issue' to be resolved is whether the boundary for the Trenant Vale area is the correct one in the context of the criteria of the NPPF as well as the local area and community.

## General

No.	From:	Summary of Comment	Planning reasons and other relevant comments (consultant's interpretation)	Consultant's Suggestions
86	Name withheld	<i>Need more business space</i>	Says Trenant Vale and Dunveth have limited space. The loss of employment space at Dunveth means there is a shortage of business space. Would welcome an Innovation Centre	Consider whether the lesson of Dunveth could usefully be referred to in the introduction to Section 11
203	Scott Mann MP	<i>We must encourage new ways of working</i>	Wants the Plan to be flexible enough to cater for new and changing ways of working	Consider whether the need to accommodate changing working methods and trends should be referred to in the introduction to Section 11
222	Cornwall Council	<i>In Cornwall approximately 11% of jobs are directly reliant on tourism. It is likely that the Visit Cornwall figure includes retail and wholesale figures which are difficult to disaggregate from domestic spend.</i>	Questions how the Visit Cornwall figures will be interpreted	Consider whether para. 11.1 needs revising
222	Cornwall Council	<i>11.7 – typo, 'tells'.</i>	Appreciate the typo being pointed out	Amend word to 'tells' (plural) on first line of para. 11.7

*Summary Conclusion*

Only three comments were received that are directed towards the Jobs and Economy Section in general terms, which could not be assigned to a specific policy for analysis purposes. All of the respondents appear supportive of the general 'thrust' of the policies as they relate to jobs and the local economy. There is a call from the community for more space and more flexibility in policy to help local enterprise.

## Policies

*Policy JE01 Existing Business*

*Proposals for change of use of existing business premises from employment use will be supported only if they have been empty for over 12 months and during that time actively marketed at the current market rate without securing a viable alternative employment use. Development proposals which lead to the improvement, modernisation or upgrading of current employment sites and premises will be supported where:*

- i. they will not have an unacceptable impact on residential amenity through noise, lighting, hours of operation etc.*
- ii. they will not have an unacceptable adverse impact on the transport network and parking conditions*
- iii. they will not have any other unacceptable environmental impact.*

No.	From:	Summary of Comment	Planning reasons and other relevant comments (consultant's interpretation)	Consultant's Suggestions
54	Name withheld	<i>Supports policy</i>	Support noted	No change required
222	Cornwall Council	<i>Policy JE01 – first sentence 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</i>	Concerned that the policy does not conform with Local Plan Policy 5. The LP policy is more lenient only requires 9 months of marketing and this can be done whilst the property is occupied. This	Need to seek advice on whether no-conformity is contrary to the strategic policies of the LP

		<i>premises to be vacant for any length of time.</i>	is recognised in para. 11.10 of the NP.	
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#### *Summary Conclusion*

Community response to the policy is very limited but favourable. Other contributions are limited to that from Cornwall Council only. The Council has expressed concern that the policy does not conform with Local Plan Policy 5. The NP policy is more stringent. This should not be a problem if the Local Plan policy is deemed not to be a strategic one and the policy in the Neighbourhood Plan is adequately supported by local evidence and justification. A discussion with the local planning authority is required.

#### *Policy JE02 New Employment Opportunities*

*Development proposals to provide new business space and/or employment opportunities within the built-up area boundaries will be supported where:*

- i. they will not have a negative impact on residential amenity through noise, lighting, hours of operation etc;*
- ii. they will not have an adverse impact on the transport network and parking conditions; and*
- iii. any other environmental impact can be appropriately mitigated.*

<b>No.</b>	<b>From:</b>	<b>Summary of Comment</b>	<b>Planning reasons and other relevant comments (consultant's interpretation)</b>	<b>Consultant's Suggestions</b>
54	Name withheld	<i>Support policy but questions wording</i>	Suggests policy should read: "Development proposals to provide new business space and/or employment opportunities within the built-up area boundaries will be supported where: i. they will not have a <i>measurable</i> negative impact on residential amenity through noise, lighting, hours of operation etc; ii. they will not have a <i>significant</i> adverse impact on the transport network and parking conditions; and iii. any other environmental impact can be appropriately mitigated.	Consider whether the use of the suggested adjectives will add to the effectiveness of the policy and, if so, how the supporting text can help make them 'measurable' and how to justify any threshold
222	Cornwall Council	<i>typo, boundary;</i>	Appreciate the typo being pointed out	Change word to boundary (singular) on 2 <sup>nd</sup> line of policy
222	Cornwall Council	<i>reference to noise covered in Local Plan Policy 16;</i>	Points out that noise is an aspect of wellbeing policy in the LP	Consider whether a reference to LP policy 16 could be useful
222	Cornwall Council	<i>sub-criteria (iii) is unnecessary as this is picked up through other policy provisions.</i>	Suggests that criterion iii is unnecessary as it is addressed by other policies	Consider whether criterion iii adds useful reference to the prospect of harmful environmental impacts

#### *Summary Conclusion*

Community response to the policy is limited to one respondent that suggests the use of selective adjectives would help the policy achieve what it is intended to do. Cornwall Council has also made a suggestion about re-wording the policy. A review of the policy-wording in the light of the comments and in the interests of clarity and simplicity would be appropriate.

### Policy JE03 Farm Business Diversification

The conversion of existing agricultural buildings for commercial purposes to support farm diversification in the interests of viability will be supported where the proposal can demonstrate that there would be:

- i. no harmful impact upon the surrounding rural landscape;
- ii. no unacceptable conflicts with agriculture and other land-based activities;
- iii. no harmful impact on the local road network;
- iv. no harmful impact on the amenities of neighbouring residents or businesses; and
- v. no requirement for rebuilding or substantial extension.

No.	From:	Summary of Comment	Planning reasons and other relevant comments (consultant's interpretation)	Consultant's Suggestions
54	Name withheld	<i>Support policy but questions wording</i>	Wishes to see policy read: i. no <i>measurable</i> harmful impact upon the surrounding rural landscape; ii. no <i>significant adverse impacts</i> on agriculture and other land-based activities; iii. no <i>significant</i> harmful impact on the local road network; iv. no <i>unmitigated measurable</i> harmful impact on the amenities of neighbouring residents or businesses; and v. <i>does not involve significant demolition or more than 50% additional building footprint</i>	Consider whether the use of the suggested adjectives will add to the effectiveness of the policy and, if so, how the supporting text can help make them 'measurable' and, as is the case with suggestion v, how to justify any threshold
203	Scott Mann MP	<i>Farms have redundant buildings</i>	Recognises that there are redundant buildings in the countryside that need to bring back into use	Consider making reference to the existence of 'redundant' farm buildings in the supporting text paras. 11.14 or 11.15 or 11.2
222	Cornwall Council	<i>(i) unnecessary as this is picked up through other policy provisions (e.g. NDP Policy NE03).</i>	Suggests that criterion i is unnecessary as it is covered by NP policy NE03 which refers to development protecting "rural areas against insensitive development/alterations impact on rural character"	Consider whether criterion i is meaning something more specific i.e. the area immediately surrounding the development, if so then further explanation may be necessary.
222	Cornwall Council	<i>Is (v) too restrictive in terms of stipulating there must be no requirement for rebuilding (what if part of an agricultural building needs work carrying out on it?).</i>	Points out that criterion seems to prohibit partial re-building	Consider whether a re-wording of the policy is necessary to ensure the policy says what it means to say

### Summary Conclusion

Community response to the policy is limited to one respondent that has suggested that an extra criterion and the use of selective adjectives would help the policy achieve what it is intended to do. Cornwall Council has also made a suggestion about revising criteria. A review of the criteria and their wording in the light of the comments and in the interests of clarity and simplicity would be appropriate.



## Section 12 Town Centre and Retail

### General

Nine comments were received that are directed towards the Town Centre and Retail Section generally and could not be assigned to a specific policy for analysis purposes.

No.	From:	Summary of Comment	Planning reasons and other relevant comments (consultant's interpretation)	Consultant's Suggestions
54	Name withheld	<i>Supports all policies</i>	Support noted	No change required
74	Name withheld	<i>Object to more shops but agree to less cars</i>	Does not agree with the retail approach of the NP	Note objection, but no change required
94	Name withheld	<i>Complains about lack of disabled access to Town Hall</i>	Specific complaint about the inadequate provision for disabled access to the Town Hall	Refer complaint to the Town Council
95	Name withheld	<i>Complains about lack of disabled access to Town Hall</i>	Specific complaint about the inadequate provision for disabled access to the Town Hall (offers potential solution)	Refer complaint and suggestion to the Town Council
168	Name withheld	<i>Encourage a supermarket on the east side of the river</i>	Believes that major supermarket on the east side of town would relieve pressure on town centre bridge crossing Not a proposal that is put forward by others	Note idea, but no change required
226	Name withheld	<i>Disappointed the way the town centre has declined</i>	Regrets the on-going demise of the retail sector in the town centre	Consider whether recent trends can be halted or reversed to improve the balance of activities in the town centre
247	Name withheld	<i>Must do all we can to ensure town centre remains the Hub of the community</i>	Believes that the town centre still has an important role to play	Note support for approach in the NP
170	Environment Agency	<i>While the Neighbourhood Plan positively identifies housing sites outside of the flood risk areas, the town centre that supports the community is at risk. The plan promotes a competitive town centre but doesn't acknowledge how flood risk may influence this development. The long-term sustainability issue of the impact of climate change on the town centre therefore needs formal recognition within the plan.</i>	Wants the Plan to recognise that the town centre may face issues because of the future impact of climate change and it should be made clear that the increasing 'risk' should impact on development policies and proposals	The Plan must make plain that that the growing flood risk as a result of continued climate change and this should have an effect on new development especially in the town centre

### Summary Conclusion

The town centre and retailing in the area is a topic that has drawn markedly more comments from the community than from organisations and businesses. Only the Environment Agency has made comment in a general way on the topic. It points out that the 'Town Centre and Retail' section and its policies makes scant reference to flood risk and wants to see a clear reference to the need to plan for an increasing flood risk to the town centre.

The community respondents have highlighted some of the other town centre 'issues' that are very current although most are beyond the scope of the NP i.e. traffic, disabled access to the Town Hall, and a declining retail sector.

**Policy TR01 Town Centre Development**

*The Wadebridge Town Centre is defined on inset Map M. Proposals for retail and associated commercial development within this area that add to the centre's vitality or community benefit will be supported. The loss of shops and commercial units, to non-employment uses, within the defined area will not be supported unless it can be demonstrated that:*

- i. the use of the premises for these purposes is no longer economically viable; or*
- ii. the proposed alternative use would provide equal or greater benefits for the local economy and community than the current use.*

*Residential use of accommodation on the upper floors of town centre businesses will be supported provided that such accommodation is not currently in employment use and that the residential use does not adversely affect the viability of any ground floor commercial use.*

<b>No.</b>	<b>From:</b>	<b>Summary of Comment</b>	<b>Planning reasons and other relevant comments (consultant's interpretation)</b>	<b>Consultant's Suggestions</b>
68	Name withheld	<i>Need to redevelop site on Polmora Road</i>	Identifies redevelopment opportunity in the town centre (Polmora Road)	Policy is supportive in principle
209	Name withheld	<i>Observations on town centre development</i>	Calls for a flexible approach in case demand for either retail or offices does not occur – nominates an area (off Goldsworthy Way) for town centre expansion	Ensure town centre policy is flexible and sufficiently adaptable not to leave spaces empty
212	Name withheld	<i>Expand town centre area</i>	Calls for an enlarged town centre boundary to include named locations across the river (Egloshayle side)	Review and ratify the defined boundary in the light of comments and suggested redevelopment sites
170	Environment Agency	<i>Flood risk to the town centre needs to be recognised and reflected in the plan.</i>	Wants it made clear that the increasing 'risk' should be taken fully into account by development proposals	Consider wither an additional sub-clause relating to addressing flood risk can be appropriately included in this policy or is better addressed elsewhere in the Plan
222	Cornwall Council	<i>12.8 – typo, 3rd sentence 'that have would'.</i>	Appreciate the typo being pointed out	Amend 6 <sup>th</sup> line of para. 12.8 to read 'that would have....'
222	Cornwall Council	<i>Policy TR01 – its recommended that first sentence is amended to 'To aid the interpretation of Local Plan Policy 4 at Wadebridge, Map M sets out Wadebridge Town Centre, the Primary Shopping Area and Primary Retail Frontages.'</i>	Suggests a re-wording of the policy to relate the policy to Local Plan Policy 4	Consider amending the wording of the policy as suggested

**Summary Conclusion**

Community response is limited to three. One is supportive of the policy as written, the other two conflict with each other (by doubting the future demand for commercial space, in one case, or proposing an enlarged commercial area in the other). Neither offer compelling arguments for a change of policy. Cornwall Council is generally content with the policy and its purpose but would like the policy statement to be more connected to Local Plan Policy 4 by reference to it in the policy itself, rather than just in the supporting text. More fundamental is the point made by the Environment Agency about the lack of reference to future flood risk, particularly in the town centre. There is a need to consider, in discussion with the LPA and the Environment Agency, whether Local Plan Policy 26 'Flood risk management and coastal change', is sufficient; or whether a more specific policy or criteria are required in the Plan to address the concerns expressed.



### Policy TR02 Major Retail Development

*Outside the Town Centre Proposals for new large-scale retail development or major extensions to existing retail outlets, including the use of temporary, seasonal retail space, outside of the town centre will only be supported where it can be demonstrated that:*

- i. there will be no adverse impact on the economic viability or vitality of Wadebridge Town Centre and of its retail businesses;*
- ii. the development will meet an un-met need for such a facility; and*
- iii. it cannot be accommodated within or immediately adjacent to the town centre area.*

No.	From:	Summary of Comment	Planning reasons and other relevant comments (consultant's interpretation)	Consultant's Suggestions
85	Name withheld	Dunveth Business Park should have been for business not retail	Uses evidence of Dunveth business park becoming a retail park that takes trade away from the town centre, to call for no further out-of-town retail areas	Supports policy no action
222	Cornwall Council	<i>Policy TR02 – In relation to new retail development, the requirements of this drafted policy are largely covered by CLP Policy 4 (exception being criteria ii.). Therefore, recommend that this policy is reviewed.</i>	Suggests that the policy does not add much to Local Plan Policy 4 and requests that the policy is reviewed without saying to what end.	Discuss possible policy changes with the LPA

### Summary Conclusion

There is no community objection to the draft policy. Cornwall Council's position seems to be supportive of the general policy approach but critical of the policy itself. A discussion with the LPA is required.

### Policy TR03 Pedestrian Priority in the Town Centre

*Proposals to pedestrianise further the area of Molesworth Street delineated on Map M will be supported provided that suitable access arrangements for deliveries can be made. All developments should recognise the potential improvements to pedestrian and cycle movement within the town centre and include such measures if possible.*

No.	From:	Summary of Comment	Planning reasons and other relevant comments (consultant's interpretation)	Consultant's Suggestions
17	Name withheld	<i>Supports pedestrianisation</i>	Note support for pedestrianisation	No change required
68	Name withheld	<i>Supports pedestrianisation of Molesworth St</i>	Note support for pedestrianisation	No change required
95	Name withheld	<i>Supports pedestrianisation of Molesworth St</i>	Provides examples of being endangered by current limitations – suggests retractable bollards and day-time closure to vehicles	Refer suggestion to Town Council
222	Cornwall Council	<i>Policy TR03 – Molesworth Road isn't clearly shown on Map M and so this map should be reviewed to ensure legibility (perhaps consider including a key).</i>	Wants clearer map	Review this as part of an overall review of maps in the Plan
222	Cornwall Council	<i>Policy TR03 – Consider amending the policy title to 'Pedestrian and Cyclist Provision'</i>	Suggests the policy title is changed because <i>the policy doesn't just relate to pedestrians, or the town centre whilst it would be unusual to relate the policy to just pedestrian and cycling priority measures</i>	Consider whether a change of policy name is necessary and pertinent after any revisions to the policy have been agreed.

222	Cornwall Council	<i>Policy TR03 – Second sentence, consider reviewing to something along the lines of “All developments <b>should seek to include measures to improve pedestrian and cycle infrastructure provision, particularly improving links to/from and movement through the town centre.”</b></i>	Suggests a change of wording to the policy in the interests of clarity	Consider accepting suggested revised of 2 <sup>nd</sup> sentence of the policy
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#### *Summary Conclusion*

Community response to the policy is very limited but supportive of extensions to the pedestrianisation-restrictions on Molesworth Street. Cornwall Council has requested a better map and suggested changes to the policy title and wording, to make it clearer and more relevant, which are worthy of consideration.

#### *Policy TR04 Trevilling Quay*

*Development proposals for a mixed-use development at Trevilling Quay that includes cultural and leisure facilities that meet local demands, will be supported provided:*

- i. they preserve and enhance the character of the river frontage;*
- ii. public access to the river for maritime activities, including the launching of river craft, is maintained;*
- iii. it includes open space alongside the river and a shared use riverside route for pedestrians and cyclists;*
- iv. any commercial development is compatible with other uses of the site and would not have a detrimental impact on the economic viability of the town centre;*
- v. the height of buildings within 100 metres of the river will be limited so that they neither overpower the area between them and the river, nor obstruct the views of the river from Gonvena Hill;*
- vi. an area at the northern end of the site is appropriately developed and landscaped to provide for a range of river-based activities and for a picnic area; and*
- vii. the proposed scheme is subject to a Design Review. A proposal solely for residential development on this site will not be supported.*

No.	From:	Summary of Comment	Planning reasons and other relevant comments (consultant's interpretation)	Consultant's Suggestions
4	Name withheld	<i>Development criteria for Trevilling Quay</i>	Wants any development to be no more than two-storey Cites Bradford Quay as an example of what is not appropriate as it would spoil the visual aspect of the river area	The policy and its criteria for this key site should be reviewed in the light of the many comments and suggestion made
14	Name withheld	<i>Trevilling Quay frontage to remain public</i>	Wishes the river front to have public access and be used for marine/business activities	Same as 4 above
20	Name withheld	<i>Supports policy</i>	Support noted	No change required
25	Name withheld	<i>Supports policy</i>	Support noted	No change required
37	Name withheld	<i>Concern about protecting river frontage</i>	Wants public access along the length of the river front and marine activity – any residential development would be detrimental to this	Same as 4 above
47	Name withheld	<i>Supports policy</i>	Support noted	No change required
53	Name withheld	<i>Supports development at Trevilling Quay – protect public access to river front</i>	Trevilling Quay must be mixed use not just residential to avoid another Bradford Quays that denies public access to the riverside There should be marine activity on the riverside with cafes and bars	Same as 4 above

			Public access by foot and cycle Residential should be no more than 30% of the developed site	
61	Name withheld	<i>Sceptical that development will be advantageous</i>	Has doubts that the redevelopment of Trevilling Quay will benefit the community at large	Note that some people do not support the redevelopment of Trevilling Quay
64	Name withheld	<i>Don't replicate Bradford Quay</i>	Concern about quality of any development	Same as 4 above
69	Name withheld	<i>Develop cultural and leisure facilities at the Quay</i>	Considers Trevilling Quay a perfect location for cultural and leisure facilities with a small number of shops and cafes	Consider whether the scope of the policy can be widened to take account of the several positive suggestions
85	Name withheld	<i>Trevilling Quay policy looks positive</i>	Is supportive of the redevelopment proposal but thinks a barrier is necessary to realise the potential of the riverside	Same as 69 above
99	Name withheld	<i>Supports policy</i>	Support noted	No change required
104	Name withheld	<i>Questions justification of selecting Trevilling Quay for development</i>	Wonders why Trevilling Quay has been made the subject of a policy when Commissioners Quay (which has better access to highways network and nearby parking) is excluded	Same as 61 above
109	Name withheld	<i>Policy will make area attractive to developers for housing</i>	Points out the area is a flood zone It should be used for marine-based activities because of the historic link Removing that stipulation will make the site attractive to developers of houses	Same as 4 above
147	Name withheld	<i>Riverside should remain for the public to walk and enjoy recreation facilities and spaces</i>	Says this should remain a public area where people can walk along the river and enjoy recreational facilities Cautions that area is very contaminated (wartime dumping)	Same as 4 above
163	Name withheld	<i>Concerned there will be no affordable housing at Trevilling</i>	Concerned there will be no affordable housing at Trevilling Quay	Same as 4 above
175	Name withheld	<i>No housing at Trevilling Quay - develop as a marine industrial zone Include public access</i>	Wants public access along the length of the quayside and marine activity encouraged Employment opportunities should be created in preference to housing Flood defences to provide housing would be very expensive and preclude affordable housing	Same as 4 above
184	Name withheld	<i>Support redevelopment of Trevilling Quay</i>	Support noted	No change required
202	Name withheld	<i>Include an area of land on Gonvena Field to the development area</i>	Wants land on Gonvena added to the policy area to	Same as 69 above

			provide housing (to make the redevelopment viable) and an access road (to help the schools)	
204	Name withheld	<i>Leisure development should be to benefit local people not an overflow area for Rock</i>	Supports a redevelopment that provides recreation and leisure activity for local people and avoids a development like Bradford Quays	Same as 4 above
209	Name withheld	<i>Observations on redevelopment issues</i>	Questions whether redevelopment is necessary as the area is in productive use Public access could hamper boatyard activity	Same as 61 above
212	Name withheld	<i>Supports policy</i>	Support noted	No change required
224	Name withheld	<i>Restrict height of development and protect Govenia Fields</i>	Says the redevelopment should not be the same height as Bradford Quays	Same as 4 above
240	Name withheld	<i>Concern that this will become luxury residential development scheme and no public access</i>	Wants to protect quayside for marine activity fears developers will restrict public access and traditional riverside activity as witnessed elsewhere e.g. Lymington	Same as 61 above
46	White Rock Residents Association	<i>Supports policy</i>	Support noted	No change required
102	Historic England	<i>We would therefore recommend that in reviewing the pre-submission version of the Plan and its supporting evidence in light of the Regulation 14 consultation feedback that these gaps are addressed before formal submission to Cornwall Council. In doing so, and as an illustration, we would encourage consideration of such matters as the basis of the height restriction of new development in policy TR04, a point we have made previously.</i>	Requests that heritage aspects are taken into account and reflected better in the policy and the supporting text, including its relevance to height restrictions	Consider whether the impact of growth and major development on the historic environment can be properly addressed within policies in the NP and the need for site-specific criteria
105	Situ8 for Merriman Ltd	<i>As set out in the Regulation 14 Pre-submission NP Trevilling Quay is required to be a mixed use development that includes cultural and leisure facilities that meet local demand with public access to the river for maritime activities, including the launching of river craft. It is also required to provide a shared use riverside route which would need to be a minimum 3m wide. To comply with the Regulation 14 Pre-submission NP, any development of Trevilling Quay would need to be master planned and could not come in piecemeal to ensure that the mixed use development is delivered. At present no detailed work has yet been undertaken to ascertain the level of mixed use development that could be provided at Trevilling Quay. It is noted that there are in excess of 80 residential units at the adjacent Bradford Quay development. It is clear that given the size of the mixed use</i>	Points out that major redevelopment at Trevilling Quay would need to be subject to a masterplan. Suggests that a large number of residential units could be accommodate as part of a mixed development (based on Bradford Quay), which would have significant highway implications, which in turn could affect the deliverability of the redevelopment It suggests that the lower third of Gonvena Land, should be included a part of the Trevilling Quay allocation as to provide access and infrastructure space and accommodate	Same as 69 above

		<p><i>allocation, (when compared to Bradford Quay) a significant number of dwellings along with other uses could be accommodated on the site. A development of this size would generate a significant increase in traffic, most likely using best judgement, several multiples of the existing traffic currently generated by the industrial uses.</i></p> <p><i>A technical appraisal has been carried out by Situ8, to identify and analyse the potential transport and highway issues for delivering a mixed use development, and this concludes that there are a number of issues which will affect delivery of this site, not only including highway safety issues relating to the existing Trevilling Road/ Gonvena Hill Junction but the fact that insufficient land within the highway limits is available to provide for junction capacity and safety improvements.</i></p> <p><i>...the issues around accessibility may affect deliverability of the site.</i></p> <p><i>It is suggested that the inclusion of the lower third of Gonvena Land, as part of the Trevilling Quay allocation, would enable works to the highway e.g. allowing wider footways and road widths to accommodate two-way traffic, with an additional access point down through the site from Bodieve Road, which would also enable a viable two-sided development, with the inclusion of housing on the lower section of the Gonvena Hill site.</i></p>	sufficient dwellings to ensure viability	
112	Heynes Planning for Progress Land Ltd	<p><i>We also draw reference to the site at draft Policy TR04 which covers land at Trevilling Quay.</i></p> <p><i>This site is identified for mixed use development including, potentially, housing as confirmed at para. 12.21. That said there is a conflict between the explanatory text to the draft Policy and the draft Policy itself which goes to great lengths to state that “a proposal solely for residential development will not be supported” yet the Key to Map N identifies the area “Suitable for Residential Development”. If this is the whole site allocated for development, then it is misleading. Further, noting its location next to the River Camel there is potential for significant impact in respect of ecology and flooding. Indeed, on the latter point the SEA makes very little comment regarding flood risk apart from stating that it is flood zone 2 and 3.</i></p> <p><i>Given its proximity to the River then surely greater clarification is needed as to whether the zone 3 designation is that of 3a or 3b?</i></p>	<p>Points out that the supporting text states that a proposal solely for residential development at Trevilling Quay will not be supported yet the map indicates the whole policy area is “suitable for residential development”</p> <p>Suggests that the key to the map is misleading</p> <p>Points out that the policy makes little reference to the flood implications of the impact on local ecology</p>	<p>Consider amending the policy and/or supporting text to ensure the expectations for the site are clearly stated and seen as part of the overall growth and development strategy</p> <p>Address any potential conflict or ambiguity between map and policy</p>
170	Environment Agency	<p><i>Development of Trevilling Quay needs to recognise flood risk, and how regeneration of this site can integrate flood defences</i></p>	<p>Requires the flood risk to be recognised and how a regeneration scheme should be integrated with</p>	<p>The Plan must make plain that that the growing flood risk has been taken into</p>

		<i>with those at Bradford Quay to protect the existing properties in the area.</i>	flood defences with those at Bradford Quay	account when master-planning the Trevilling Quay site
187	Environment Agency	<i>12.17 – There is also a group of other recreational clubs that use the estuary and existing access at Wadebridge. Rowing clubs from Rock, Port Isaac, Padstow and Bude will boost the numbers of water users referenced in this para.</i>	Suggests it would be useful to include reference to other clubs that regularly use the river and will likely increase future usage	Consider making reference to other clubs that regularly use the river and the growing demand
187	Environment Agency	<i>12.20 Recommend a plan or strategy is developed to promote sustainable access to the river. The natural environment should not be impacted by uncontrolled access from public or private recreational access.</i>	Recommends that a strategy is developed to promote sustainable access to the river to protect the local ecology	Pass the recommendation from EA on to the three councils
203	Scott Mann MP	<i>Amend policy</i>	Criteria ii – suggests it is amended to read: ii <i>free</i> public access to the river for maritime activities, including the launching of river craft, is maintained <i>and enhanced</i> ;	Consider amending the criteria as part of an overall review of the policy approach to this key site
222	Cornwall Council	<i>12.16 – typo, Map</i>	Appreciate the typo being pointed out	Capitalise the word Map in line 1 of para. 12.16
222	Cornwall Council	<i>12.18 – typo, experienced.</i>	Appreciate the typo being pointed out	Change word to ‘experienced’ in line 1 of 12.18
222	Cornwall Council	<i>12.16 – 12.21 – there seems to be a lack of reference to any background evidence supporting this policy?</i>	Points out that there are no references to background information and studies that support the content of this policy	Ensure that all criteria are justified, defined when necessary and backed by evidence
222	Cornwall Council	<i>Policy TR04 – the inclusion of ‘that includes cultural and leisure facilities that meet local demand’ – does this mean that proposals that could serve more than local demand will be refused, e.g. what if part of a mixed-use proposal included facilities that would improve the tourism offer?</i>	Identifies a potential ambiguity in the policy that requires a re-wording	Consider amending the criteria as part of an overall review of the policy approach to this key site
222	Cornwall Council	<i>Policy TR04 (i) – ‘preserve and enhance the character of the river frontage’ – is the existing character of this site one which merits preserving? Could this criteria constrain landmark design proposals?</i>	Suggests that more explanation is need as to what is meant and what is acceptable under criterion i	Ensure that all criteria are justified, defined when necessary and backed by evidence
222	Cornwall Council	<i>Policy TR04 (iii) – consider ‘public open space’.</i>	Suggests the word “ <i>public</i> ” is added before “ <i>open space</i> ”	Consider amending the criteria as part of an overall review of the policy approach to this key site
222	Cornwall Council	<i>Policy TR04 (vi) – consider ‘...activities and for public open space, to include a picnic area’.</i>	Suggests a minor re-wording to include any picnic area within an area of public open space	Consider amending the criteria as part of an overall review of the policy approach to this key site
222	Cornwall Council	<i>Policy TR04 (vii) – consider ‘the proposed scheme is subject to a Design Review by the Cornwall Design Review Panel’.</i>	Suggests a re-wording to refer any scheme to the Cornwall Design Review Panel	Consider amending the criteria as part of an overall review of the policy approach to this key site
222	Cornwall Council	<i>Policy TR04 – consider adding a criteria to prevent piecemeal development on the site, for instance ‘Planning permission for the development of only part of the site</i>	Suggests adding a criterion relating to the need for an overall masterplan or concept plan	Consider amending the criteria as part of an overall review of the

		<i>will not be granted, unless it is in accordance with a masterplan or concept plan for the entire site which clearly sets out the pedestrian and cycling connections through the site, launching and open space provision’.</i>		policy approach to this key site
222	Cornwall Council	<i>It would also be useful to have Policy TR04 closer related in the document to the other site allocations.</i>	Questions whether this policy should be placed elsewhere in the Plan document, so it is more closely related to other site allocation policies	Consider whether the policy should be relocated in the next version of the plan to more closely related to other site-specific development policies

#### *Summary Conclusion*

The Trevilling Quay draft policy attracted a considerable community reaction. Some 26 comments from community sources have been submitted, of which only 15% can be categorised as opposing the purpose of the policy i.e. to facilitate a mixed-use redevelopment of the quay area. There is significant community support in principle, but many of the community respondents have expressed concern about either the quality or impact of the redevelopment on this key location site. There is little disagreement about the need for the development to protect and improve public access to the riverside and restrict the amount of residential development. Developer’s representatives however have questioned whether a mixed-use development is deliverable, without a high number of dwellings being part of the overall development of the area. Developers have also raised concerns about the impact of any redevelopment on infrastructure and the environment.

The Environment Agency says the policy does not pay enough heed to flood risk and its mitigation. Cornwall Council considers there are several ambiguities within the policy criteria. Based on these two significant representations, there is a need to review the scope and content of the policy. Such a review should result in a policy that establishes an appropriate framework for a master-plan approach to redevelopment of the area.

## Section 13 Housing

### General

No.	From:	Summary of Comment	Planning reasons and other relevant comments (consultant's interpretation)	Consultant's Suggestions
73	Name withheld	<i>Should be specifying sustainable development criteria</i>	Calls for high energy and water saving specification for all new dwellings	Ensure Plan encourages environmentally friendly and sustainable developments
143	Name withheld	<i>Reporting abuse of council tenancy</i>	Not a NP issue	Refer comment to Town Council
235	Name withheld	<i>Recognise impact of demand from retirees</i>	Concerned that young people will not be adequately provided for – as mature households and retirees dominate the market	Ensure Plan adequately addresses the housing needs of local people and in particular young families starting on the ladder
203	Scott Mann MP	<i>Consider a design guide</i>	A design guide was adopted by Cornwall Council in 2013.	A local design guide or design statement is a substantial task but could be done with the help of AECOM It may be appropriate now, given the NPPF's greater emphasis on the role of the NP in the design process May be a valuable and complementary document to the revised Plan
222	Cornwall Council	<i>Section 13 (Housing) – the structure of the document is unusual; normally the housing section would feature further up front in the NDP. It's recommended that consideration is given to moving the housing section in the document structure so that it adjoins the Sustainable Development section.</i>	Points out the order of topics is not typical of NPs. It suggests that the housing section should follow the Sustainable Development section.	Review sequence of topics and policies after the policies have been revised.
222	Cornwall Council	<i>Footnote 38 – can this be more specific (and again present this evidence from your online evidence base).</i>	Would like a more specific reference and weblink if possible	Can an electronic link to older SHMA's, undertaken by NCDC, be found or created

### Summary Conclusion

Only four comments have been received from community sources of which two are outside the scope of a neighbourhood plan. Cornwall Council points out that the order of topics in the Wadebridge Area NP is not the conventional order used by many NPs. This may not be a problem, but it should be considered once the policies have been re-drafted or re-affirmed.

### Policies

#### Policy HS01 Meeting Local Housing Need

*A range of housing sizes, types and tenures is required, to ensure that all sectors of the community are catered for. New housing development will, first and foremost, be required to meet the needs of the local community as identified by the most up-to date housing needs evidence. All major housing development proposals should demonstrate how they contribute to meeting current local housing needs, including an adequate supply of smaller, lower cost housing. Development proposals for affordable and community-led housing schemes will be subject to occupancy based on local connection policy criteria set out in the Cornwall Local Plan.*

No.	From:	Summary of Comment	Planning reasons and other relevant comments	Consultant's Suggestions
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			(consultant's interpretation)	
54	Name withheld	<i>Supports policy</i>	Support noted	No change required
64	Name withheld	<i>Need social housing not affordable</i>	Would like social housing to be at least 50% of developments	Refer to LP policy 8 Ensure that the issues of affordability and local peoples' ability to access to housing is satisfactorily recognised in the Plan
75	Name withheld	<i>Percentage of Lifetime homes on new development</i>	Wants a proportion of lifetime homes to enable people to stay in the community	Refer to LP policy 6
98	Name withheld	<i>Affordable homes should go to people with a local connection</i>	Wants the Plan to include eligibility criteria	Refer to LP policy 8 and criteria
158	Name withheld	<i>Plan omits reference to the need supported living – favours a cluster development</i>	Wants the benefit of cluster-type development for young people to be recognised	Refer to LP policy 6
203	Name withheld	<i>Supports policy – vital to discourage 2nd homes</i>	Support noted	No change required to this policy
211	Name withheld	<i>Need to enforce affordable housing numbers</i>	Points out that developers' viability studies tend to reduce proportion of affordable housing – calls for Plan to ensure high proportion of affordable homes	Recognise the importance of achieving the appropriate level and type of affordable housing
46	White Rock Residents Association	<i>Supports need for small dwellings</i>	Calls for sufficient small units to suit first-time buyers and the elderly	Ensure the Plan adequately emphasises the need to meet a range local housing needs
140	Boat Club	<i>Need more council houses to replace right-to-buys and cheaper new-builds for first time buyers</i>	Responding to a local need that they are aware of	Consider how this contribution from a local 'witness' helps provide additional evidence in support of the policy
178	Scott Mann MP	<i>More one-bedroom properties to allow down-sizing for older resident in social housing</i>	MP is responding to a local need that he is aware of	Consider how this contribution from a local 'witness' helps provide additional evidence in support of the policy
222	Cornwall Fire Service	<i>Residents who are elderly, disabled, live alone or have a terminal illness are at greater risk of a domestic fire. If more than one of these factors applies then the risk is increased even more. Cornwall Fire Service is working with partners in Cornwall Council and social landlords to ensure that new housing stock is suitable for the aging population and groups identified as being at more risk for fire in their homes. The Housing our Ageing Population: Panel for Innovation (HAPPI) report is available at: (website link provided) The report includes recommendations that Councils include housing for the elderly in the community as care feature of local plans and that Happi recommendations are included in the design of retirement</i>	For sound safety reasons, it would like to see the NP have a policy that deals with the internal design of retirement accommodation including accessibility, sprinklers and the use of monitoring technology. It would like sprinklers to be a standard requirement of developers for all affordable housing and those for elderly and disabled residents.	Internal facilities and arrangements are beyond the scope of the NP but the HAPPI report could be referred to as a source of advice for developers

		<p><i>accommodation. This includes accessibility and the use of monitoring technology.</i></p> <p><i>The use of domestic sprinkler or misting systems greatly reduces the risk of fire developing to a stage where it becomes life threatening. The changes to building regulations in Wales making sprinkler installation compulsory all domestic premises had reduce the cost of installation and improved availability of suppliers. Sprinklers save lives.</i></p> <p><i>The inclusion of fire sprinklers in all affordable housing and those specifically for elderly or disabled residents should be included as a requirement for developers</i></p>		
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### Summary Conclusion

There is little objection or criticism of policy HS01 that seeks to ensure that new housing development addresses local housing needs in the right way. Most of the comments received are from community-based sources. Several call for as many small units as possible, recognising that young people and the elderly within the community are relatively ill-served by the current housing market. What is meant by affordability is an issue for some. The Fire Service has referred to a report that includes sound recommendations relating to housing for the elderly and disabled. What has been suggested is beyond the scope of the NP but could be referenced as a source of advice.

There seems little reason to change the policy, but it should be reviewed in the light of additional evidence and community feedback. The supporting statement may benefit from references to what the community has said in the most recent consultation and from extended reference as to how the NP policy links to relevant LP policies.

### Policy HS02 Retaining Affordable Housing Stock

*Affordable housing provided in compliance with either Local Plan Policy 8 or Local Plan Policy 9 should be subject to a Legal Agreement ensuring that it remains an affordable dwelling for local people in perpetuity.*

No.	From:	Summary of Comment	Planning reasons and other relevant comments (consultant's interpretation)	Consultant's Suggestions
54	Name withheld	<i>Supports policy</i>	Support noted	No change required
178	Name withheld	<i>Supports policy</i>	Support noted	No change required
205	Name withheld	<i>Housing should be truly affordable to local people</i>	Wants affordability to recognise the local market Supports policy, agrees affordable housing stock to remain so in perpetuity	Refer to LP policy 8 Ensure that the issues of affordability and local peoples' ability to access to housing is satisfactorily recognised in the Plan
101	Persimmon Homes	<i>Policy HS02 appears to have no purpose and is just a duplication of requirements set out within the Local Plan and national planning guidance. Para. 13.15 suggests that a planning condition does not sufficiently ensure the delivery of the affordable housing, and asserts that the Neighbourhood Plan requires a legal agreement from developers in the form of a Section 106 Agreement. It is a requirement of Cornwall Council that all planning applications that involve affordable housing will be required to complete a Section 106 Agreement, in turn ensuring the sufficient supply of affordable housing. The Neighbourhood Plan does</i>	Suggests that the NP policy HS02 does no more than replicate the LP policy. Does not consider it necessary to refer to the Affordable Housing Team's statement "a planning condition does not sufficiently ensure the delivery of the affordable housing" as all planning applications involving affordable housing are required to complete a Section 106 Agreement	The LP policy for affordable housing states: <i>Planning obligations will be used to ensure that affordable housing is provided and (where possible) retained for eligible local households.</i> Need to consider whether this is sufficient or whether the NP policy requirement that "a Legal Agreement ensuring that it remains an affordable dwelling

		<i>not need to duplicate policies that are covered in the Cornwall Local Plan or the NPPF. Policy HS02 does not add any significant detail at the local level, and therefore it is considered that Policy HS02 should be removed from the Wadebridge Neighbourhood Plan.</i>		<i>for local people in perpetuity” is a significant ‘advance’ Discuss with Cornwall council as S106 is often better than an alternative legal agreement or conditions, as it can be easier to enforce and monitor.</i>
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#### Summary Conclusion

The only objection to the policy comes from the representative of one developer. Cornwall Council does not raise any concerns about the policy as it is written. There seems insufficient reason to change the policy.

#### Policy HS03 Infill Housing

*Development proposals for infill sites within the settlement areas will be supported provided they:*

- i. fill a restricted gap in the continuity of existing frontage buildings or on other sites within the built-up area of the town or village where the site is closely surrounded by buildings;*
- ii. are of a scale, massing, density and design in keeping with the local character of neighbouring buildings;*
- iii. have access and parking arrangements that do not result in an unacceptable direct or cumulative impact on congestion or road and pedestrian safety; and*
- iv. where the scheme is for one dwelling, the proposal respects and relates to its surroundings in relation to the historic development patterns or building/plot sizes.*

No.	From:	Summary of Comment	Planning reasons and other relevant comments (consultant's interpretation)	Consultant's Suggestions
54	Name withheld	<i>Supports policy</i>	Support noted	No change required
178	Name withheld	<i>Supports policy – ensure there is adequate parking</i>	Particular support for criteria iii	No particular action
101	Persimmon Homes	<i>In similarity to our comments regarding Policy HS02 above, we would comment that Policy HS03 appears to simply be a restatement of paras. 1.65 - 1.68 of the Cornwall Local Plan Strategic Policies</i>	Regards the policy as a restatement of paras. in the LP, although much of the text is not included in the policy statement itself.	Consider whether the Local plan statements provide sufficient direction and the NP policy is therefore unnecessary
222	Cornwall Council	<i>Policy HS03 (iv) – recommend ‘where the scheme is for one dwelling’ is removed as this criteria would still be relevant to proposals for more than one dwelling (e.g. two flats in one building).</i>	Suggests “where the scheme is for one dwelling” is unnecessary as this criterion would still be relevant to proposals for more than one dwelling (e.g. two flats in one building).	Consider whether the suggested deletion would weaken or narrow the policy in any way.

#### Summary Conclusion

Community respondents, though few, are generally happy with policy HS03 as drafted. Contributions have been received from the representative of a developer, that suggests the policy is simply a reiteration of part of the Local Plan; and Cornwall Council, which suggests one of the criteria is amended as a sub-clause is unnecessary. A simple alteration to the policy may be appropriate.

#### Policy HS04 Innovative Housing Solutions

*Development proposals that provide socially and/or architecturally innovative open market housing solutions will be supported where these are sensitively designed to complement neighbouring buildings and landscape. This will include self-build, modular and community led schemes, and the provision of low-cost housing for those who cannot afford to buy or rent larger properties and who would not qualify for social housing allocated on the basis of social need and vulnerability.*

No.	From:	Summary of Comment	Planning reasons and other relevant comments	Consultant's Suggestions
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			(consultant's interpretation)	
54	Name withheld	<i>Supports policy</i>	Support noted	No change required
178	Name withheld	<i>Supports policy</i>	Support noted	No change required
107	Turley for Redrow Homes	<i>We support these policies due to them being non-restrictive and as they encourage innovation in housing provision to support increased choice and increased overall housing delivery.</i>	Support noted	No change required
222	Cornwall Council	<p><i>The pre-submission draft appears to be in general conformity on Affordable Housing matters with the Local Plan and draft Affordable Housing Supplementary Planning Document.</i></p> <p><i>The current drafting [of Policy HS04] appears unclear whether it's aimed at both open market and affordable housing or simply more accessible open market housing, perhaps for first time buyers. If this policy is only targeted at open market homes suggest adding "open market" after "low-cost".</i></p> <p><i>Alternatively, if the policy is for both open market and affordable homes - suggest replacing the word "low-cost" with "Affordable" to emphasis the tenure differences. In addition, the final part of the sentence could then be deleted as affordable homes for rent are available to those most in need – deleting "and who would not qualify for social housing allocated on the basis of social need and vulnerability."</i></p> <p><i>Once the policy has been clarified we're happy to assist in the drafting if it's of assistance.</i></p>	<p>Implies it is unclear whether the policy is aimed at both open market and affordable housing or simply more accessible open market housing.</p> <p>Suggests that, in either case, it would benefit from some re-wording in the interests of clarity.</p>	<p>Need to confirm that the policy applies to more accessible open market housing and perhaps explain better what is meant in the supporting text.</p> <p>Take up offer of help in drafting from the LPA</p> <p>Ensure the policy is in sync with the revised definition of affordable housing in the new NPPF</p>

### Summary Conclusion

Community response to the policy is very limited but favourable. A single response from the representative of a developer also expresses support for the policy. Cornwall Council has sought clarity on the scope of the policy and offered to help with its re-drafting to ensure it is fit for purpose.

### Policy HS05 Self Build Dwellings

*Proposals for self-build on exception sites will be supported where the proposed development is adjacent to, or well-located to the existing built up area and where there is evidence of a local demand for this type of development AND where all of the following criteria are met:*

1. *The site must be wholly for self or custom build of permanent homes. Open market self-build plots must not represent more than 50% of the homes or 50% of the land take, excluding infrastructure, open space or services and should be sold a serviced plot basis. The non-open market plots should be provided as serviced plots and transferred to Cornwall Council, a Registered Social Landlord or a Community Land Trust at no cost. That organisation shall then dispose only of the leasehold interest in the plots at a fixed cost to be determined by the Council*
2. *An appropriate amount of public and open space is included in line with policy and where possible, existing trees and hedgerows are retained.*
3. *All housing on the site must comply with any plot passport or master plan/guidance produced for the site.*
4. *The following additional criteria will apply to the leasehold plots*
  - a. *All plots must be built and first occupied by a person on the Cornwall Council self-build register with a valid local connection, to provide a home for themselves as their principal residence.*
  - b. *There is a planning restriction to prevent the sale of the house on the open market for a period of 5 years (a tapered penalty will be payable if the house is sold before during that initial 5-year period)*
  - c. *A range of plot sizes should be provided that meets the stated needs for self-build in the Parish on the Self and Custom Build Register, restricted to a maximum size of 60sqm for a one-bedroom property or 90 sqm for a 2 bedroom property. Any garden area must be less than 200 sqm.*

No.	From:	Summary of Comment	Planning reasons and other relevant comments (consultant's interpretation)	Consultant's Suggestions
47	Name withheld	<i>Concern about specific site being used for self-build</i>	Fears that site 16 will be used for self-build housing – considers it inappropriate There is no reference to the site in the Plan	Note concern, but no change required
54	Name withheld	<i>Should be proportion of self-build on sites of over 20</i>	This policy is about exception sites only. LP policy deals with matter of proportion of self-build on larger development sites	Refer to LP policy 6,
84	Name withheld	<i>Self build element is very positive for local families</i>	Support noted for policy that widens opportunities for local people	No change required
178	Name withheld	<i>Supports policy</i>	Support noted	No change required
196	Name withheld	<i>Concerned that policy will mean development of site 16</i>	Objects to site 16 being considered for self-build housing This is not the case	Note concern, but no change required
107	Turley for Redrow Homes	<i>We support these policies due to them being non-restrictive and as they encourage innovation in housing provision to support increased choice and increased overall housing delivery.</i>	Support noted	No change required
203	Scott Mann MP	<i>Welcomes self-build policy</i>	Support noted	No change required
222	Cornwall Council	<i>1. The policy is aimed at exception site delivery; as such it would be useful to reference conformity with Policy 9 Rural Exception Sites of the Local Plan. This would add clarity concerning requirements to meet and address an identified housing need, and appraise the level of cross-subsidising open market housing to prevent over provision of open market dwellings. 4.c. Maximum size requirements are detailed, however there are no restrictions on 3 bed dwellings or larger. In terms of Affordable self-build, homes are required to meet Nationally Described Space Standards (NDSS) but not exceed NDSS by more than 10% based on bed space need, to ensure homes remain affordable for future purchasers / renters.</i>	Suggests reference is made to how the policy conforms with Local Plan policy 9 Suggests reference in the policy should also be made to site area restrictions on larger self-build dwellings (3 bed or more) which is related to the NDSS	Add a reference in the supporting text to the relationship with Local Plan policy 9
222	Cornwall Council	<i>Policy HS05 (2) – ‘An appropriate amount of public and open space is included in line with policy..’ it’s not clear what this means/how this is determined?</i>	Needs explanation of what criterion 2 means or it needs re-phrasing	Add further explanation in the supporting text about criterion 2
222	Cornwall Council	<i>Policy HS05 (3) – what is a ‘plot passport’? This should be explained in the supporting text to avoid confusion.</i>	Needs explanation of what “plot passport” means	Add further explanation in the supporting text about what “plot passport” means

### Summary Conclusion

The community response, which is generally supportive, has been complicated by a map at an exhibition, indicating 'site 16' as being a potential self-build site (which is not a NP proposal). One representative of a developer has also expressed support for the policy, in the interests of increasing choice and overall housing delivery. Cornwall Council is supportive of the policy but has raised a couple of queries relating to definitions and explanations, which it should be able to provide help resolving as it was instrumental in writing the policy in its present form.

### Policy HS06 Layout and Design

*Developments of 10 or more dwellings must demonstrate design variety in site arrangement and building form. Site arrangement, layout and design should respect and relate to topography and features of local distinction.*

No.	From:	Summary of Comment	Planning reasons and other relevant comments (consultant's interpretation)	Consultant's Suggestions
54	Name withheld	<i>Make reference to open space needs</i>	Open space on new development is addressed by LP	Include reference to LP policy 12
178	Name withheld	<i>Supports policy</i>	Support noted	No change required
101	Persimmon Homes	<i>This Policy appears to repeat the advice contained within Policy 12 of the Strategic Local Plan Policies however the wording contained in HS06 is vague in its requirements and therefore of limited use in terms of practical application. It is our view that the Policy should be removed given its repetition of existing policy in addition to which the detailed nature of design requirements are best dealt with through a design guide rather than limited policy wording.</i>	Considers the policy as having little relevance because of its lack of specificity. Suggests it is deleted as it adds little to LP Policy 12. Suggests that a Design Guide would be a better option to influence layout and design.	Take into account that the LPA does not seem to share the view expressed by the developer.
222	Cornwall Council	<i>Policy HS06 – consider the approach set out previously where the wording is phrased 'Planning applications should demonstrate how development proposals....'</i>	Suggests a re-phrasing of the policy (as per that suggested for SD05)	Reword policy as suggested by the LPA Consider the merit of preparing a local design statement or guide

### Summary Conclusion

Community response to the policy is very limited but favourable. Only one developer commented on the draft policy by suggesting that it had little practical application. The LPA has not raised any concern about the policy, although it would like to see it re-phrased to be more reasonable and flexible.

### Policy HS07 District Heating Schemes

*Proposals for the use of district heating schemes in new developments preferably using renewable energy sources such as biomass to provide low cost heating will be supported.*

No.	From:	Summary of Comment	Planning reasons and other relevant comments (consultant's interpretation)	Consultant's Suggestions
54	Name withheld	<i>Add "and other low-carbon heating strategies"</i>	Wishes to add criteria to policy	Consider whether suggestion should be accommodated
178	Name withheld	<i>Supports policy – should add "and low carbon heating strategies"</i>	Wishes to add criteria to policy	Consider whether suggestion should be accommodated
190	Stride Treglown for Chaddlewood Investment Ltd	<i>The second sentence of this paragraph [13.28] makes reference to 'district housing schemes'. It is assumed this is a <b>typographical error and should read 'district heating systems'.</b></i>	Appreciate the typo being pointed out	Amend second sentence of 13.28 to read 'district heating schemes'

222	Cornwall Council	<i>Typo (use of commas)</i>	Suggests commas would help make the policy clearer as follows: <i>Proposals for the use of district heating schemes in new developments, preferably using renewable energy sources such as biomass, to provide low cost heating will be supported.</i>	Consider whether additional punctuation helps to make the policy clearer
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#### *Summary Conclusion*

Two suggestions have been received from community sources to extend the policy for district heating schemes to include reference to examples of renewable energy sources other than just biomass. The implication of including the wider “*and low carbon heating strategies*” phrase needs to be considered. Two other respondents have pointed out a typographical and a potential punctuation error.



## Section 14 Natural Resources and Energy

### General

No.	From:	Summary of Comment	Planning reasons and other relevant comments (consultant's interpretation)	Consultant's Suggestions
70	Name withheld	<i>All new houses should have solar panels</i>	This matter is outside the scope of the NP – controlled by the Government's policy for national technical standards	No change required
85	Name withheld	<i>There is not widespread opposition to wind turbines</i>	Only one person has challenged the assertion in 14.3 that there is "significant public opposition to large wind turbines..."	Point noted, but no change required
85	Name withheld	<i>Lack of electric car charging points and no reference to solar panels on housing</i>	Points out rightly that the Plan does not mention electric-charging points For solar panels see observation on point 70 above	Consider whether electric car charging points need referring to, in some way, in the Plan
186	Name withheld	<i>Pleased that Plan makes references to energy efficiency</i>	Satisfaction noted	No change required

#### Summary Conclusion

The policies under this topic heading, attracted few comments and very little criticism. It can only be concluded that, as regards renewable energy use and development, the contents of the Pre-Submission Neighbourhood Plan satisfactorily reflect the views and aspirations of the local community.

#### Policies

##### Policy RE01 Micro Energy Generation

*Proposals for micro-generation within the Built-up Area identified on Map C that require planning permission will be supported where any negative impacts on the built, natural or historical environments can be acceptably mitigated and where there are no unacceptable impacts on neighbouring properties.*

There are no specific comments received on either the policy or the supporting statement.

##### Policy RE02 Solar Arrays

*Development proposals for small ground-mounted solar PV arrays of less than 1MW capacity will be supported provided that they comply with all the requirements of the Local Plan and are sited so as to be associated with existing buildings or a settlement. Proposals for medium sized arrays (between 1 and 2 MW capacity) must demonstrate that they are sited entirely on a brownfield site, where one is available, or otherwise on land which is assessed as Grade 3B or below and is in full compliance with Cornwall Council guidance on siting for the relevant Land Character Area. Development proposals for larger (over 2 MW capacity) solar arrays will not be supported.*

No.	From:	Summary of Comment	Planning reasons and other relevant comments (consultant's interpretation)	Consultant's Suggestions
54	Name withheld	<i>Supports policy</i>	Support noted	No change required

#### Summary Conclusion

Community response to the policy is very limited but favourable. No contributions have been received from the organisational and business respondents.

##### Policy RE03 Wind Turbines

*Development proposals for all wind turbines other than those considered to be micro-generation must be sited at least 1.5km away from settlement areas and the AONB, SAC and SSSI, as indicated on Map O. Proposals will be supported where:*



- i. there are no adverse impacts on landscape character or it can be demonstrated that impacts can be satisfactorily mitigated; and
- ii. there are no adverse impacts on the setting and character of heritage and historical assets
- iii. there are no adverse impacts on wildlife, biodiversity or habitats, or it can be demonstrated that impacts can be satisfactorily mitigated; and
- iv. the turbine is situated within the curtilage of, or adjacent to, the farm, dwelling or enterprise for which the power is largely to be used and
- v. the number, siting, scale and design of turbines and associated infrastructure and buildings have no adverse impact on:
  - a. local amenity of nearby dwellings (including visual amenity, noise, vibration, electromagnetic interference, shadow flicker)
  - b. the enjoyment of or access to public rights of way and other access routes; and,
  - c. public safety or, where there are any adverse impacts, these can be satisfactorily mitigated.

In addition to the above, proposals for more than one turbine or turbines exceeding 25m in height (including the blade tip) must undergo screening for Environmental Impact Assessment with their application. Such proposals should demonstrate that there is no adverse impact on the residential amenity of occupants of dwellings within 500 metres of turbines up to 45 metres or 1000 metres for larger turbines. Where any adverse impacts are identified, these must be satisfactorily mitigated.

No.	From:	Summary of Comment	Planning reasons and other relevant comments (consultant's interpretation)	Consultant's Suggestions
54	Name withheld	Supports policy	Support noted	No change required
70	Name withheld	Oppose any installation of wind turbines	Opposes development of any new wind turbines (Nb. no mention of scale)	Opposition noted, but no change required

#### Summary Conclusion

Community response to the policy is very limited. One respondent was wholly in support of the policy approach proposed; the other was against, on the basis that they are opposed to all wind turbines. On the basis of a very small sample, it would be wrong to conclude that community opinion is divided. As only one person has objected to the policy it would be more appropriate to conclude that the community does not object to the policy as it is written.

#### Policy RE04 Visual Impact of Wind Turbines

All proposals for wind turbines shall be required to include a cumulative assessment of the visual impact of all such turbines using the matrix contained in an Annex to the Supplementary Planning Document on Renewable Energy which forms part of the Cornwall Local Plan.

There are no specific comments received on either the policy or the supporting statement.

#### Policy RE05 Community Energy Projects

Support will be given to community energy projects which have as their primary purpose long term and inclusive economic, social and environmental benefits for the community and: fall within the definitions of community energy contained in the Cornwall Council's Revised SPD on Renewable Energy;

- i. meet the local community ownership criteria\*, and
- ii. is acceptable to the local community (as represented by its Town or Parish Council)

No.	From:	Summary of Comment	Planning reasons and other relevant comments (consultant's interpretation)	Consultant's Suggestions
54	Name withheld	Supports policy	Support noted	No change required
222	Cornwall Council	<i>Typo, remove ':' between '...and fall...'</i>	Appreciate typo being pointed out	Remove colon in line 3 of policy

#### Summary Conclusion

Community response to the policy is very limited but favourable. No contributions have been received from the organisational and business respondents.

## Section 15 Transport and Traffic

### General

Nine comments were received that are directed towards the Transport and Traffic Section generally and could not be assigned to a specific policy for analysis purposes.

No.	From:	Summary of Comment	Planning reasons and other relevant comments (consultant's interpretation)	Consultant's Suggestions
5	Name withheld	<i>Capacity of roads Greenhill and Towerhill</i>	Concerned about the traffic impact of growth	Note concern
6	Name withheld	<i>Impact of Higher Trenant Road development on local roads</i>	Questions traffic plan for new development	Refer to LPA
54	Name withheld	<i>Supports all policies</i>	Support noted	No change required
76	Name withheld	<i>Suggestions for double yellow lines</i>	Suggests locations where double-yellows are need (Bridge View and parts of Egloshaye Road) – not a NP matter	Refer to highway authority
152	Name withheld	<i>Concern about scale of growth on traffic</i>	Concerned particularly about road safety for cyclists	Ensure this matter is adequately covered by NP policy TT03
164	Name withheld	<i>Include reference to electric cars</i>	Points out that the Plan does not mention electric cars	Consider whether a reference to the beneficial impact of electric cars should be made and whether charging points need referring to in the Plan
167	Name withheld	<i>Make sure Wadebridge has better roads</i>	Too many roads are too narrow for the volume of traffic	Consider whether the narrowness and restricted capacity of existing roads needs emphasising further
235	Name withheld	<i>On-street parking is a major problem</i>	Calls for additional 'community parking areas'	Consider if this problem can be satisfied by policy TT02
203	Scott Mann MP	<i>Little said about how residents get around</i>	Remarks that development will be further away from town centre and advocates community bus or park and ride	Ensure need for and value of alternative transport modes is fully recognised in the Plan
222	Cornwall Council Transport	<i>A degree of conflict with some of their transport statements and objectives. Principally the wish to reduce the impact of vehicles, especially in the town centre, yet are looking increase car parking in the town centre stating that the over 60s (15.19) especially need it - yet they have access to a free bus pass and buses access the town centre.</i>	Suggests it may be necessary to explain and justify the 'conflict' inherent in seeking to reduce reducing impact of cars in town centre yet wanting more car parks Refers to justification in 15.19 for car parking spaces for the elderly (who have bus passes)	Consider whether there is an inherent conflict between policies that can be explained or justified

### Summary Conclusion

We are informed that for too long Wadebridge has been a town with traffic problems. The by-pass may have removed much of the area's through-traffic, but the scale of local traffic has continued to grow, and certain parts of the town's network are congested on an almost daily basis. There is little dispute about where the hotspots are. Concern has been expressed that new development will add to the problem rather than help solve it and most importantly, there is a fear that the extent of the problem will not be fully recognised or addressed.

## Policies

### Policy TT01 Impact of Traffic

Proposals for all major new developments, as defined by the Town and Country Planning (Development Management Procedure) (England) Order 2010, will need to demonstrate, as part of a transport assessment, how vehicular access and circulation to and from the development will mitigate potential impact on roads, road users and residential amenity in the Plan area, and, in particular, the impact of increased traffic on the following roads:

- A. Egloshayle Road
- B. Gonvena Hill
- C. Tower Hill
- D. Trenant Vale
- E. Trevanion Road
- F. White Rock Road

Proposals to improve the safety of road users on these roads are supported.

No.	From:	Summary of Comment	Planning reasons and other relevant comments (consultant's interpretation)	Consultant's Suggestions
26	Name withheld	<i>Supports policy</i>	Support noted	No change required
43	Name withheld	<i>Shares concerns about impact of increased traffic</i>	Mostly concerned about traffic speeds and road safety at specific points on Egloshayle Road	Refer to Highways Authority
99	Name withheld	<i>Adequate control needed to protect Egloshayle village</i>	Hopes any development at Trevarner has direct link to the by-pass	No specific change required
182	Name withheld	<i>Support policy</i>	Support noted	No change required
192	Name withheld	<i>Trenant Vale should be dead-ended</i>	Believes the only solution to Trenant Vale is a 'no through road' – this is a management not land-use matter	Refer suggestion to Highways Authority
200	Name withheld	<i>Close Trenant Vale to through traffic and create pedestrian/cycling route</i>	Advocates Trenant Vale becoming a 'no through road' – this is a management not land-use matter	Refer suggestion to Highways Authority
206	Name withheld	<i>Concerned about proposal to widen Green Hill</i>	Objects to widening of Green Hill	Refer objection to Highways Authority
212	Name withheld	<i>Emphasises need to address traffic problems on local roads</i>	Supports policy	No change required
246	Name withheld	<i>Include road where we live</i>	Address has been redacted	No reaction possible unless TC reveals road name
46	White Rock Residents Association	<i>Supports policy</i>	Support noted	No change required
101	Persimmon Homes	<i>There needs to be some clarity added to the wording of the Policy in respect of the list of roads which are expected to be given particular consideration as part of a transport assessment. Is the Policy intended to require all of these roads to be given special consideration within a TA regardless of whether the development is in the vicinity of the roads listed? It is our view that the Policy should be redrafted to allow for the roads to be considered, where relevant.</i>	Suggests the policy is re-worded to limit requirements to those roads that are relevant to the location of the development proposal	Consider a re-wording of the policy to make it clear that the roads in question should be part of the transport assessment whenever relevant
107	Turley for Redrow Homes	<i>The supporting text (paras. 15.9 to 15.13) does not provide any reference to the justification for listing particular roads within Wadebridge and does not provide</i>	Says the policy does not meet the basic conditions because the Plan does not justify the roads named	Consider whether the evidence presented is sufficient

		<i>and evidence as to what is required to mitigate these traffic impacts. There is also not reference in the policy for development contributing towards Wadebridge Transportation Strategy. Due to the reasons listed above, the policy therefore fails basic conditions.</i>	and provide evidence of what mitigation is required	
110	Cllr McHugh (CC)	<i>Need to be concerned about management of town centre traffic and re-routing of Camel Trail cyclists</i>	Suggests policy should include: "all major developments <i>MUST</i> provide specific funds via the CIL or Section 106 to adequately and proportionately contribute to the management of town centre traffic and re-routing of Camel Trail cyclists"	Consider how the funding of traffic management and improvements to cycle routes can be usefully referred to in the Plan
222	Cornwall Council Transport	<i>Supports policy</i>	Support noted	No change required
222	Cornwall Council	<i>A map identifying these roads would be a useful supplement.</i>	Suggests a map showing the roads listed would be helpful	Consider including a map showing the specific roads/locations to which the policy applies

### Summary Conclusion

Community response to this policy is either one of support or nominating additional hotspots to be referred to. The two developers that have responded both question the fairness of the policy as written, either because the evidence for the extensive list of roads is not apparent in the Plan and its associated documents, or because the policy requires a transport assessment that may extend beyond what is reasonable for a specific planning application. Cornwall Council has no issue with the policy, but it would seem fair to review the policy in the light of the representations to ensure it achieves what is expected of it.

### Policy TT02 Town Centre Parking

*An increase in public car parking provision on land within or adjacent to the town centre that is consistent with the overall parking and/or traffic management strategy for the town centre will be supported provided that:*

- i. it includes a designated area for coach parking if required; and*
- ii. it meets the County Council's requirement for parking for people with disabilities.*

No.	From:	Summary of Comment	Planning reasons and other relevant comments (consultant's interpretation)	Consultant's Suggestions
60	Name withheld	<i>Site near Piggy Lane is privately owned</i>	Provides information on land-ownership	No change required
75	Name withheld	<i>Need better disabled parking in town centre</i>	Points out inadequacy of current disabled parking provision in town centre Policy recognises need to provide for the disabled driver or disabled passenger	Note point - no change required
86	Name withheld	<i>More town centre parking is essential</i>	Makes a call for more short-term parking spaces for local people This is a management not a land use matter	Refer comment to Town Council
222	Cornwall Council	<i>Reference is made to the parking strategy and traffic management strategy for the town centre; where are these documents</i>	Support noted Missing weblink is pointed out	No change to policy is required

		<i>(missing signpost and reference in supporting text)</i>		Ensure relevant footnotes and all weblinks are included
222	Cornwall Council	<i>(ii) – Cornwall Council, not County Council.</i>	Points out incorrect name of organisation	Amend to read 'Cornwall Council'

#### Summary Conclusion

Three community comments only have been received. All are aimed at supporting the intention of the policy. The LPA too supports the policy and helpfully points out a couple omissions and errors in the supporting text.

#### Policy TT03 Safe Cycle and Pedestrian Links

*All major developments should provide safe cycle and pedestrian routes, including, where possible, links to and from Wadebridge town centre and essential public facilities such as schools and health facilities and connecting with existing cycle and walking networks. These routes and links should be designed to benefit from natural surveillance as well as adequate lighting.*

No.	From:	Summary of Comment	Planning reasons and other relevant comments (consultant's interpretation)	Consultant's Suggestions
17	Name withheld	<i>Supports policy</i>	Support noted	No change required
68	Name withheld	<i>Need to improve facilities for cyclists</i>	Calls for bike parks in the town centre	Consider whether reference could be made in policy TT02, which relates to parking in the town centre
182	Name withheld	<i>Supports policy</i>	Support noted	No change required
210	Name withheld	<i>Colour cycle routes green tarmacadam</i>	Suggests practical management measures to improve road safety for cyclists but not a land-use matter	Refer suggestion to highways authority
222	Cornwall Council Transport	<i>Supports policy</i>	Support noted	No change required

#### Summary Conclusion

Four community comments only have been received. All are in favour of measures to improve the safety of the cyclist and pedestrian. The LPA too supports the policy.

#### Policy TT05 Local Shopping

*To encourage local shopping on foot, proposals to create a small convenience store where appropriate within existing or new residential areas will generally be supported.*

No.	From:	Summary of Comment	Planning reasons and other relevant comments (consultant's interpretation)	Consultant's Suggestions
222	Cornwall Council Transport	<i>Supportive in general, however consideration would need to be given to the amount of parking provided, as the aim of the policy is to increase shopping by foot.</i>	Suggests that parking provision at such local facilities may need to be restricted if it is to encourage people to visit on foot	Consider the merits of the argument or whether imposing parking space limitations could lead to local congestion
222	Cornwall Council	<i>consider deleting 'where appropriate' and/or 'generally'</i>	Suggests a simplification of the policy to read: <i>To encourage local shopping on foot, proposals to create a small convenience store within existing or new residential areas will be supported.</i>	Consider whether a more permissive policy is what is needed

### Summary Conclusion

There were no community submissions regarding this policy. Only Cornwall Council has offered observations, which include a suggested policy amendment to ponder.

### Policy TT06 Pedestrian and Cycle Priority in Town Centre

*Measures to provide dedicated routes for pedestrians and cyclists through Wadebridge town centre will be supported.*

No.	From:	Summary of Comment	Planning reasons and other relevant comments (consultant's interpretation)	Consultant's Suggestions
176	Name withheld	<i>Cycle routes need better management arrangements to increase use and improve safety – network should be increased</i>	Positive comments in support of the policy	Refer management suggestions to highways authority
140	Boat Club	<i>Narrow disabled road crossings</i>	Concerned about road-crossing challenges for the disabled	Not a NP matter, refer to TC and highways authority
222	Cornwall Council Transport	<i>Supports policy - dedicated cycle and pedestrian links through the town centre - would suggest that they don't have to be dedicated as such, rather create an environment where all users co-exist with speeds managed better. The Transport Strategy recommends a 'slow speed environment' type scheme.</i>	Supports policy but questions whether "dedicated" is necessary if co-use is better managed/controlled	Consider how the alternatives are referred to in the supporting text and whether they should also be reflected in an amended policy
222	Cornwall Council	<i>consider merging with TR03 and TT03</i>	Suggests that two policies could be merged as both relate to non-car travel in the town centre	Consider the merits of merging policies TR03 and TT06 and where the resultant policy would be best placed

### Summary Conclusion

It seems that the community is content with the policy and its intentions although there are aspects of the network in the town centre that need attention to minimise conflicts and improve safety. The comments and suggestions received should be referred to the appropriate bodies.

Cornwall Council has offered observations, which include policy amendments to ponder.



## Section 16 Arts and Culture

### General

Only two comments were received that are directed towards the Arts and Culture Section generally and could not be assigned to a specific policy for analysis purposes. In both cases they suggest that the introduction may usefully be up-dated.

No.	From:	Summary of Comment	Planning reasons and other relevant comments (consultant's interpretation)	Consultant's Suggestions
32	Name withheld	<i>Need for a concert hall</i>	Questions whether para. 16.2 remains accurate – is Hay Studio still operational and open to the public? No mention of need for concert hall	Check whether 16.2 needs up-dating Also, can any up-date on concert hall proposal be included?
184	Name withheld	<i>Supports arts and cultural development</i>	Would like to see reference to positive actions for developing arts and culture in the town	Can anything further be said in the introduction by way of an up-date?

### Policies

#### *Policy AC01 Art in the Public Realm*

*Development proposals that introduce innovative design and art into the public realm and which facilitate greater community use of public spaces will be supported where the proposal is in accordance with other policies in this Plan.*

No.	From:	Summary of Comment	Planning reasons and other relevant comments (consultant's interpretation)	Consultant's Suggestions
178	Name withheld	<i>Supports policy</i>	Support noted	No change required
222	Cornwall Council	<i>Delete '...where the proposal is in accordance with other policies in this plan.'</i>	Suggests a simplification of the policy to read: <i>Development proposals that introduce innovative design and art into the public realm and which facilitate greater community use of public spaces will be supported.</i>	Consider whether more permissive policy is appropriate in all situations/locations

#### *Summary Conclusion*

Community response to the policy is very limited but favourable. Of the organisations and businesses that responded to the Plan only Cornwall Council offered thoughts on this policy.

#### *Policy AC02 Centre for Arts and Cultural Activity*

*The development of additional arts and cultural facilities in Wadebridge town centre are supported where they will not have a detrimental effect on existing facilities.*

No.	From:	Summary of Comment	Planning reasons and other relevant comments (consultant's interpretation)	Consultant's Suggestions
178	Name withheld	<i>Supports policy</i>	Support noted	No change required

#### *Summary Conclusion*

Community response to the policy is very limited but favourable. No contributions have been received from other organisational and business respondents.

## Section 17 Sport and Recreation

### General

Only four comments were received that are directed towards the Sport and Recreation Section generally, which could not be assigned to a specific policy for analysis purposes. The three community comments all make a similar point regarding the River Camel. Its potential as a recreation resource, they allege, is understated in the introductory section of the 'Sport and Recreation' section of the Plan. Cornwall Council has provided a useful up-date on its intention to prepare an open space SPD.

No.	From:	Summary of Comment	Planning reasons and other relevant comments (consultant's interpretation)	Consultant's Suggestions
77	Name withheld	<i>Make river an important feature of recreational activity – walks on both sides</i>	Wants to see walkways along both river banks used for leisure walks Aspirational -	Should potential of river and riverside for recreation and leisure be further emphasised?
86	Name withheld	<i>River would be used more if there was a barrier</i>	Very aspirational	Should potential of river and riverside for recreation and leisure be further emphasised?
246	Name withheld	<i>Value of river is under-stated</i>	Wants riverside to be hive of marine activity and a tourist attraction	Should potential of river and riverside for recreation and leisure and its tourist potential be further emphasised?
222	Cornwall Council	<p><i>The NPPF 2012 (para 73) 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.</i></p> <p><i>In July 2014 Cornwall Council adopted the Open Space Strategy for Larger Towns in Cornwall as interim planning guidance pending the adoption of the Local Plan. It has recently been updated to be taken forward as an evidence base for a Supplementary Planning Document (SPD).</i></p> <p><i>Wadebridge Town, encompassing some of the rural parishes is one of the study areas and the latest standards therefore apply – for further details see <a href="http://www.cornwall.gov.uk/environment-and-planning/parks-and-open-spaces/open-space-strategy-standards">http://www.cornwall.gov.uk/environment-and-planning/parks-and-open-spaces/open-space-strategy-standards</a>.</i></p> <p><i>The above strategy specifies provision standards and policies for delivering open spaces, including quantities of six different essential types of open space, design requirements and minimum accessible distance thresholds. Additional assessment in the surrounding rural parishes would probably not result in useful conclusions.</i></p> <p><i>Whilst the NDP does not refer to the adopted provision standards, it does set out aspirations for investment in strategic POS (policy SR03 and para 18.7), which are mutually compatible. This will be particularly relevant to future planning obligations for developments in the area.</i></p> <p><i>As this information is needed in support of open space standards in order to meet</i></p>	Informs us of the intention to develop an SPD	Consider whether including reference to the emerging SPD and its scope would be useful in support of the policy approach in the Plan



		<i>rules on Section 106 pooling and to meet the three tests for planning obligations.</i>		
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## Policies

### *Policy SR01 Protecting Sports Pitches and Recreational Fields*

*The following existing recreation areas (see inset Map P) are very important to the local community and should be protected:*

1. *Jubilee Fields*
2. *Egloshayle Playing Fields*
3. *Coronation Park*
4. *Wadebridge Football Ground*
5. *Wadebridge Camels Rugby Ground*
6. *Wadebridge Primary Academy Playing Fields*
7. *Wadebridge School Playing Fields*
8. *St Breock Primary School Playing Fields*

*Proposals to develop them in part or whole will be resisted unless:*

- i. *an assessment has been undertaken which clearly shows, to the satisfaction of the relevant Town or Parish Council, that the open space and any ancillary buildings within that space to be surplus to local and strategic need and demand; or*
- ii. *the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity, quality and community accessibility in a suitable location; or*
- iii. *the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss; or*
- iv. *the development is ancillary to the use of that land as recreational/open space; and the proposal is shown to have the support of the local community to the satisfaction of the relevant Town or Parish Council.*

<b>No.</b>	<b>From:</b>	<b>Summary of Comment</b>	<b>Planning reasons and other relevant comments (consultant's interpretation)</b>	<b>Consultant's Suggestions</b>
14	Name withheld	<i>Support for policy</i>	Support noted	No change required
54	Name withheld	<i>Supports policy</i>	Support noted	No change required
68	Name withheld	<i>Should develop green gym</i>	Does not specify where such a green gym should be Perhaps make reference in the Section's introduction to health and wellbeing facilities	Consider whether to emphasise the health and wellbeing agenda in the introduction to the section

### *Summary Conclusion*

Community response to the policy is very limited but favourable. No contributions have been received from organisational and business respondents.

### *Policy SR02 Promoting Tourism*

*Proposals for tourism-related developments will be generally be supported provided they comply with other policies of this Plan.*

<b>No.</b>	<b>From:</b>	<b>Summary of Comment</b>	<b>Planning reasons and other relevant comments (consultant's interpretation)</b>	<b>Consultant's Suggestions</b>
54	Name withheld	<i>Policy rather vague</i>	Suggests amending policy to read " <i>Proposals for tourism-related developments will be supported if they provide measurable benefits that significantly outweigh any negative impacts</i> ".	Consider whether the policy would benefit from additional wording as suggested. To do so would require explanation of the kind of benefits that are either expected or appreciated

222	Cornwall Council	Delete ‘...where/provided they comply with other policies of this plan’.	Suggests that phrase is unnecessary and should be deleted as all relevant policies apply to all proposals	The phrase is used to qualify what is a very broad and general statement of support. Consider whether there is added value or significance in retaining the phrase in this particular policy
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#### Summary Conclusion

Only two comments were received. The single community respondent expresses disappointment that the policy is rather vague and would like to see it be more specific about the acceptable costs of and desired benefits from tourism development. Cornwall Council merely suggests a minor amendment to the policy wording.

#### Policy SR03 New Recreation Facilities

Development proposals to provide the following recreation facilities are supported:

- i. a skate park on land off Goldsworthy Way (see inset Map Q)
- ii. the creation of further exercise facilities for adults on Jubilee Park
- iii. the opening up of the Drovers’ Trail between Burlorne Tregoose and Ruthernbridge (see inset Map R)

No.	From:	Summary of Comment	Planning reasons and other relevant comments (consultant’s interpretation)	Consultant’s Suggestions
54	Name withheld	Supports policy	Support noted	No change required
179	Wadebridge Youth Project	Little provision for young people in the town – skate park only serves a few young people	Respondent is not opposed to skatepark – they make the point that there should be more facilities	No change required
187	Env. Agency	Page 79 – the purple areas designated for recreational use has a storage pond in the lower section closest to the Trail. This is used to store surface water in times of rain and high-water events. This needs to be protected and enhanced where possible.	The location of the storage pond is significant	The location of the storage pond should be referred to the scheme designers of the skate park Consider referring to its critical value in the supporting text

#### Summary Conclusion

Community response to the policy is very limited but favourable. The Environment Agency is keen to ensure the location of an important storage pond is recognised and referred to.

#### Policy SR04 Sports Facilities

Proposals to provide additional outdoor sports facilities and pitches are supported where they comply with other policies of this Plan. Proposals which result in a loss of existing outdoor sports facilities and pitches and/or their capacity and/or community accessibility (availability for community use) will be resisted unless:

- i. an assessment has been undertaken which clearly shows, to the satisfaction of the relevant Town or Parish Council that facilities are surplus to local and strategic need and demand; or
- ii. the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity, quality and community accessibility in a suitable location; or
- iii. the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss; and
- iv. the proposal is shown to have the support of the local community to the satisfaction of the relevant Town or Parish Council.

No.	From:	Summary of Comment	Planning reasons and other relevant comments (consultant’s interpretation)	Consultant’s Suggestions
54	Name withheld	Supports policy	Support noted	No change required

222	Cornwall Council	<i>Delete ‘...where/provided they comply with other policies of this plan’.</i>	Suggests that phrase is unnecessary and should be deleted as all relevant policies apply to all proposals	Consider whether there is any added value or significance in retaining the phrase in this particular policy
222	Cornwall Council	<i>consider merging with Policy SR01</i>		Consider the merits of merging this policy with SR01

#### *Summary Conclusion*

Community response to the policy is very limited but favourable. Of the organisations and businesses that responded to the Plan, only Cornwall Council has offered thoughts on this policy.

#### *Policy SR06 Local Footpaths*

*Measures to improve and extend the existing network of local footpaths are supported where:*

- i. sensitive ecological areas are avoided*
- ii. the construction and appearance of new paths or tracks are appropriate to the location*
- iii. opportunities are taken during construction to maintain biodiversity*

<b>No.</b>	<b>From:</b>	<b>Summary of Comment</b>	<b>Planning reasons and other relevant comments (consultant's interpretation)</b>	<b>Consultant's Suggestions</b>
54	Name withheld	<i>Supports policy</i>	Support noted	No change required
222	Cornwall Council	<i>should this be titled SR05, as SR05 is missing?</i>	Points out that the policy may need re-numbering, if SR05 has not been omitted from the Pre-Submission Version of the Plan	All policies should be subject to re-numbering once the final order is set. (SR05 was a Trevilling Quay policy in the 1 <sup>st</sup> consultation draft, which is now covered by TR04)

#### *Summary Conclusion*

Community response to the policy is very limited but favourable. One comment has been received from community sources. It expresses support for the policy. Cornwall Council too appears in support of the policy. It also points out that the policy may be mis-numbered.

#### *Policy SR07 Recreation and Tourism*

*Outside the Built-up Area Boundary Development proposals for recreation and tourism facilities outside of the built-up area boundary will be supported where they:*

- i. make provision for exercise-based and other recreational outdoor pursuits, or*
- ii. provide educational opportunities to enhance knowledge of the natural environment, or*
- iii. provide, either independently or in association with either of the above, holiday rental accommodation of less than ten units. The rental units shall be subject to a planning restriction that they should be available for at least ten months in a year for short term rents not exceeding one month and no one individual will be permitted to spend more than two months in the unit or complex in any one calendar year*
- iv. Any such proposals must respect the character of the countryside and ensure that the form, massing and materials of the development cause minimal negative impact.*

There were no specific comments received on either the policy or the supporting statement

## Section 18 Community and Infrastructure

### General

No.	From:	Summary of Comment	Planning reasons and other relevant comments (consultant's interpretation)	Consultant's Suggestions
13	Name withheld	<i>Concern over lack of community facilities and infrastructure to cope with growth</i>	Believes senior school is at capacity and a new primary school will be needed Also need a new GP surgery and dentists. With a national shortage of qualified personnel, the respondent wonders where the staff will come from	Consider whether responses to the Reg.14 consultation could be reflected in a stronger statement of community concern about the need for better infrastructure to cope in para. 9.5 and/or the Introduction to Section 18
152	Name withheld	<i>Concern about scale of growth on infrastructure</i>	Number of new dwellings required will put a strain on over-stretched infrastructure (hospital, surgeries, schools and sewage works) Makes point that roads weren't built for today's traffic	As per 13
153	Name withheld	<i>Concern about scale of growth on infrastructure</i>	Employment, traffic, schooling and doctors will all need to increase capacity if volume of new building required is to be achieved	As per 13
179	Wadebridge Youth Project	<i>Confirms that there is still lack of trained youth workers</i>	Provides a helpful up-date of the position i.e. nothing has changed	No change required
181	Wadebridge Christian Centre	<i>Recognise the role of faith-based organisations</i>	Wants the introduction to this section to acknowledge the part churches play in community life	Consider how to add an appropriate reference to the lists in 18.2 and 18.3
203	Scott Mann MP	<i>Plan should recognise the provision of dementia care and use of digital tech to meet the needs of the community</i>	Suggests this section recognises that health care provision is changing and will continue to do so	Consider how best to acknowledge how the 'landscape' is changing
222	Cornwall Council	<i>The approach set out in Section 18, to produce a list of local projects in order to guide how the Neighbourhood Portion of CIL is spent, is welcomed. The Neighbourhood Portion that is returned to the Parish Council is able to be spent on a broad definition of infrastructure; the provision, improvement, replacement, operation or maintenance of infrastructure, or anything else that is concerned with addressing the demands that development places on an area. Additional CIL funding may be available to Parishes through a bidding process, but how this might work is currently being discussed and considered by Cornwall Council. These funds will need to be spent</i>	Welcomes the list of local projects that would be the focus of Neighbourhood Portion of CIL Encourages the production of a Wadebridge Neighbourhood Area Action Plan that sets out the three councils' investment priorities (after liaison with Cornwall Council to ensure the investment strategy of the various bodies is co-ordinated) Confirms that Cornwall Council will set out what it expects CIL might be spent	Refer this matter to the three councils

		<p>on a stricter definition of infrastructure than the Neighbourhood Portion.</p> <p>The Town and Parish Councils will need to ensure that they do not spend their CIL money on something which S106 has been, or will be, sought for – looking at the list in para. 18.7, expansion of Wadebridge School is a possible example of this. If the list includes what the area would like other developer contributions to be spent on in addition to CIL, then this should be clearly explained in the Wadebridge Neighbourhood Area Action Plan so that it is clear to developers that they are not paying twice for the same item of infrastructure.</p> <p>Cornwall Council will set out what it expects CIL might be spent on in a Regulation 123 List. A draft Regulation 123 List was published alongside the Draft Charging Schedule consultation in June-August 2017, but this has not been finalised. As previously mentioned, discussions are currently underway to determine the governance around how CIL money will be distributed, and what this will be spent on. The final decisions on this will determine what the final Regulation 123 List will look like.</p> <p>Cornwall Council's website will be kept up to date with progress around this issue, and the Town and Parish Councils are advised to keep an eye on this in order to ensure their own discussions around project prioritisation link to the Council's agreed approach.</p> <p>It is anticipated that CIL will come into effect in Cornwall in January 2019. However, CIL will only become payable on commencement of a development, which means that it will take a further 1½ -2 years (approximately) before CIL payments start being made to Cornwall Council, and then redistributed to Parishes.</p> <p>The progress of CIL development and more information can be found on the Councils website at <a href="http://www.cornwall.gov.uk/cil">www.cornwall.gov.uk/cil</a>.</p>	<p>on in a Regulation 123 List, yet to be finalised</p> <p>States that CIL is likely to come into force in January 2019 – but payments will be up to a further two years away</p>	
248	St Breock Primary School	Agrees with reference in 18.2 BUT....	<p>Prefers that no specific reference is made in the plan to the situation at St Breock as it may deter people from using the pre-school</p>	<p>Consider removing the bullet point or making it more general and locationally non-specific</p>

#### Summary Conclusion

Seven comments were received that are directed towards the Community and Infrastructure Section generally, which could not be assigned to a specific policy for analysis purposes. The three anonymous community consultees echo a general concern, that is reflected in the number of policy-specific comments relating to the inadequacy of aspects of local infrastructure to cope with the proposed level of growth over the plan-period. Three community-based organisations make points that relate specifically to their 'business', which may require minor changes to the supporting text. Cornwall Council has added some useful advice and offered to work with the three councils on ensuring that greatest benefit is derived from the CIL.

## Policies

### *Policy CI01 Infrastructure Requirements*

*Development should be phased in tandem with the timely provision of infrastructure to help support sustainable growth. Financial contributions will be required, as appropriate, from each developer of major\* residential developments to mitigate the impact of the development on essential infrastructure such as public utilities, libraries, policing, waste services and the highways network. Financial contributions will be required, as appropriate, to fund additional healthcare, education and leisure services within the Plan area. Community priorities in terms of additional local facilities to be provided, as a result of new development, are set out in the Wadebridge Neighbourhood Area Action Plan.*

<b>No.</b>	<b>From:</b>	<b>Summary of Comment</b>	<b>Planning reasons and other relevant comments (consultant's interpretation)</b>	<b>Consultant's Suggestions</b>
36	Name withheld	<i>Need to improve infrastructure before any further large development</i>	Makes the point that schools, surgeries and road system do not have the capacity to cope with the proposed level of growth Also, not enough jobs	Supporting text to the policy should make plain the level of community concern there is about the capacity of infrastructure to cope and the 'areas' of main concern, as identified by the respondents to this policy
47	Name withheld	<i>Emphasises importance of adequate infrastructure</i>	Calls for phased development of community infrastructure is essential but does not give examples	As per 36
64	Name withheld	<i>Need to ensure sufficient infrastructure</i>	Makes the point that schools and surgeries do not have the capacity to cope with the proposed level of growth – and there are no clear plans in place	As per 36
65	Name withheld	<i>Concern about capacity of sewage system and Health services</i>	Makes the point that health services and sewage system do not have the capacity to cope with the proposed level of growth	As per 36
70	Name withheld	<i>Infrastructure needs to be increased before dwellings are built</i>	Makes the point that schools and surgeries do not have the capacity to cope with the proposed level of growth	As per 36
84	Name withheld	<i>Like to see a medical centre in Wadebridge</i>	Calls for a new medical centre because exiting provision is at capacity	As per 36
85	Name withheld	<i>Need a new school to meet proposed growth</i>	Makes the point that a new school would be needed to cope with the proposed level of growth	As per 36
86	Name withheld	<i>School is at capacity and surgeries are full</i>	Makes the point that schools and surgeries do not have the capacity to cope with the proposed level of growth	As per 36
90	Name withheld	<i>Lack of capacity in infrastructure to cope with all this development</i>	Makes the point that schools do not have the capacity to cope with the proposed level of growth and the traffic problems will get worse	As per 36

91	Name withheld	<i>Provide infrastructure before all the new houses and jobs</i>	Makes the point that schools and surgeries do not have the capacity to cope with the proposed level of growth – and they must come before the new homes. Also, not enough jobs and fears the roads won't be able to cope	As per 36
96	Name withheld	<i>Schools and doctors are full</i>	Makes the point that schools and surgeries do not have the capacity to cope with the proposed level of growth	As per 36
98	Name withheld	<i>Schools, surgeries and dentists need to be in place before houses</i>	Makes the point that schools and surgeries do not have the capacity to cope with the proposed level of growth – and they must come before the new homes	As per 36
202	Name withheld	<i>Schools are at capacity</i>	Suggests the Plan should identify the location of a new primary school in association with other land allocations	As per 36
205	Name withheld	<i>Need better health facilities</i>	Makes the point that schools and surgeries do not have the capacity to cope with the proposed level of growth Also, not enough jobs	As per 36
212	Name withheld	<i>Big concern about capacity of infrastructure</i>	Makes the point that schools and surgeries do not have the capacity to cope with the proposed level of growth	As per 36
101	Persimmon Homes	<i>Policy CI01 states that development should be phased in tandem with the timely provision of infrastructure, and financial contributions will be required, as appropriate, from each developer of major residential developments. CI01 lists 9 of the infrastructure improvements that the neighbourhood plan seeks to fund from developer contributions. However, this does not meet the tests set out in the Community Infrastructure Levy Regulations 2010. Legislation states that a planning obligation may only constitute a reason for granting planning permission for the development if the obligation is: necessary to make the development acceptable in planning terms, directly related to the development; and fairly and reasonably related in scale and kind to the development. However, the infrastructure set out in Policy CI01 fail to meet these tests and should therefore be removed. Furthermore, there is no justification that residential development should contribute to infrastructure. The policy itself provides no clarity on the amount of financial</i>	Challenges the need for the policy because it does not comply with the tests in the CIL Regulations 2010 and the supporting text offers no justification that residential development should contribute to infrastructure.	Consider, in liaison with the LPA whether the policy should be re-worded to ensure it has added value to higher level policies



		<i>contribution it is seeking, how the contributions are calculated, and who is ultimately in charge of the pot. There is no evidence to suggest that Policy CI01 is required and is therefore wholly unjustified. Policy CI01 does not meet the basic conditions for a neighbourhood plan and must be removed</i>		
170	Environment Agency	<i>The flood defences need to be recognised as a key piece of community infrastructure within Wadebridge.</i>	Emphasises the need to included flood defences in the list of key pieces of community infrastructure	As per 36
179	Wadebridge Youth Project	<i>Ensure new developments contribute to expansion of school facilities, youth projects and community initiatives</i>	Provides a reminder that young persons' activities are under-provided for	As per 36
222	Cornwall Council	<i>Footnote missing to explain '*'. The policy should be reviewed as it repeats existing procedures.</i>	Points out the definition of major residential development is missing from footnote	Take note of comment and ensure relevant footnotes and all weblinks are included
222	Cornwall Council	<i>Policy CI01 - where is the Wadebridge Neighbourhood Area Action Plan found (missing signpost and reference in supporting text)?</i>	Identifies missing weblink	Take note of comment and ensure relevant footnotes and all weblinks are included

### Summary Conclusion

The several community respondents that have made comment about this policy do not appear to criticise the policy per-se. The points made emphasise the concerns that the respondents and others have about the capacity of the local infrastructure to cope with a major increase in demand. The schools and health facilities are the most oft mentioned aspects that are thought to be already operating close to capacity. The capacity of the local road network and the lack of work opportunities are also cited.

One developer challenges the need, justification and fairness of such a policy. Cornwall Council raises no objection to the policy.

### Policy CI02 Community Facilities

*Proposals that result in the loss of existing community facilities will only be supported where:*

- i. there is no reasonable prospect of viable continued use of the existing building or facility which will benefit the local community and they demonstrate a need for their proposed change;*
- ii. they have been subject to consultation with the local community; and*
- iii. they will not result in the net loss of a community facility where need and demand for that facility and/or an alternative community use has been demonstrated.*

No.	From:	Summary of Comment	Planning reasons and other relevant comments (consultant's interpretation)	Consultant's Recommendation
108	NHS Property Service	<i>Policies aimed at preventing the loss or change of use of community facilities and assets, where healthcare is included within this definition, can have a harmful impact on NHS's ability to ensure the delivery of facilities and services for the community. Where such policies are overly restrictive, the disposal of unneeded and unsuitable healthcare facilities for best value can be prevented or delayed. This has a direct impact on the provision and quality of healthcare facilities and services, as it can prevent</i>	Objects to the policy as it is written and as it may affect the NHS and its property holdings in the area Says that by regarding any NHS property as 'a community facility' would be contrary to the neighbourhood planning basic conditions not having adequate regard to national policy in relation to the need to deliver facilities and services for the community and, by preventing the NHS of	Consider the implications of the policy on local healthcare facilities and delivery when reviewing the definition of community facilities to be covered by the policy



		<p><i>or delay the reinvestment of capital in modern and fit-for purpose facilities and require ongoing revenue to be spent on maintaining inefficient parts of the estate.</i></p> <p><i>Furthermore, most surplus healthcare facilities are purpose-built and at the end of their useful lives, and thus highly unlikely to be viable or suitable for other uses (principally housing).</i></p> <p><i>It is important to note that there are separate, rigorous testing and approval processes employed by NHS commissioners to identify unneeded and unsuitable healthcare facilities. These must be satisfied prior to any property being declared surplus and put up for disposal.</i></p> <p><i>Wadebridge Town Council should be advised that an essential element of supporting the wider transformation of NHS services and the health estate is to ensure that surplus and vacant NHS sites are not strategically constrained by planning policies, particularly for providing alternative uses.</i></p> <p><i>In light of supporting statement 18.3 of the neighbourhood plan which has highlighted a ‘widespread concern about the capacity of certain facilities and services to meet future demand’</i></p> <p><i>It should be noted that much of the surplus NHS property is outdated and no longer suitable for modern healthcare or other C2 or D1 uses without significant investment.</i></p> <p><i>Where NHS commissioners can demonstrate that healthcare facilities are no longer required for the provision of services, there should be a presumption that such sites are suitable for housing (or other appropriate uses), and should not be subject to restrictive policies or periods of marketing.</i></p> <p><i>The Neighbourhood Plan can be made sound through the inclusion of an additional supporting para.</i></p> <p><i>The additional para. should clarify that:</i></p> <p><i>The loss or change of use of existing community facilities will be acceptable if it is shown</i></p>	<p>disposing of its property for development, in the way it wants, not contributing towards the achievement of NHS estates’ sustainable development</p> <p>Suggests alternative policy wording</p>	
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		<p>that the disposal of assets is part of a wider estate reorganisation programme to ensure the continued delivery of public services and related infrastructure, such as those being undertaken by the NHS. Evidence of such a programme will be accepted as a clear demonstration that the facility under consideration is neither viable nor needed and that adequate facilities are or will be made available to meet the ongoing needs of the local population. In such cases no marketing will be required. Furthermore, with its current wording the Neighbourhood Plan does not effectively meet basic condition (a), as it does not have adequate regard to national policy in relation to the need to deliver facilities and services for the community. As strategic delivery of local facilities and services for the community is an important factor in sustainable development, the Neighbourhood Development Plan does not effectively contribute towards the achievement of NHS estates' sustainable development and therefore does not comply with basic condition (d). To meet the basic conditions, Policy CI02 should be modified as follows:</p> <p>"Proposals that result in the loss of existing community facilities will only be supported where:</p> <ul style="list-style-type: none"> <li>i. there is no reasonable prospect of viable continued use of the existing building or facility which will benefit the local community and they demonstrate a need for their proposed change;</li> <li>ii. they have been subject to consultation with the local community unless in the context of healthcare provision, where the loss of facilities arises from an NHS Service modernisation strategy; and or</li> <li>iii. <del>they will not result in the net loss of a community facility where need and demand for that facility and/or an alternative community use has been demonstrated.</del> Adequate facilities are provided to meet</li> </ul>		
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		<p><i>the needs of the local population”</i></p> <p><i>These changes would directly address the soundness issues outline above; they would ensure that the NHS is able to effectively manage its estate, disposing of unneeded and unsuitable properties where necessary, to enable healthcare needs to be met.</i></p>		
222	Cornwall Council	<p><i>18.9 – Para 1.81 of the Local Plan provides a definition of community facilities, its recommended 18.9 is reviewed to ensure it reflects this.</i></p>	<p>Suggests that the definition of community facilities is the same as that used in the Local Plan (Para 1.81)</p>	<p>Either replicate the wide-ranging list used to define and describe in LP para. 1.81 or ensure it is understood that the NP is consistent with the LP even though not every example is listed in NP 18.9</p>

#### *Summary Conclusion*

No community comments were received about this policy. NHS Property Services provides the main point of consideration. It objects to any of its property holding being regarded as a community asset, at least in policy terms. It does not want a neighbourhood plan policy restricting its ability to dispose of redundant property and realise best value for the long-term benefit of health service delivery.

Cornwall Council asks that the Neighbourhood Plan uses the same definition of community facilities as the Local Plan, which states that *“the definition of community facilities is wide ranging and includes public services, community centres and public halls, arts and cultural facilities, policing, fire and ambulance services, health and education facilities, public houses, public toilets, youth centres, nurseries, libraries, leisure centres, allotments, playing fields, social care facilities including day centres, places of worship and services provided by the community and voluntary sector”*. In reviewing the definition of the community facilities that are covered by the Plan, the status of local health facilities should be considered, in the light of the response from the NHS Property Services and made plain in the Plan.