Neighbourhood Planning CC Officer Consultation Response Template

Please can you complete the template when responding to the three week Council Officer Consultation for the draft Neighbourhood Development Plan Proposal. Once the three week consultation period has ended the comments will be feed back to the Neighbourhood Planning Steering Group, where minor amendments can be made to the draft plan proposal before the plan is formally submitted to Cornwall Council. If you have any queries please contact the Neighbourhood Planning Team e-mail <u>neighbourhoodplanning@cornwall.gov.uk</u>

Cornwall Council Response		
Neighbourhood Development Plan Proposal	South Hill	
Consultation documents	South Hill Neighbourhood Development Plan Proposal	
Consultation Start Date	18/08/2016	
Consultation End Date	12/09/2016	
Cornwall Council Team	Response Date	
Affordable Housing	08/09/2016	
Development Management		
Economic Development	22/08/2016	
Education		
Environment Service – Ecology		
Environment Service – Landscape Architect Officer		
Environment Service - Open Spaces Officer		
Historic Environment		
Local Plan Team – Community Infastructure Levy		
Local Plan Team – Natural Resources		
Local Plan Team		
Transport	25/08/2016	
Cornwall Fire and Rescue Service	08/09/2016	

Affordable Housing

General comments:

The overarching intentions of the plan and the detail of the proposed policies is supported.

Legal and conformity issues:

The Housing policies within the Neighbourhood Development Plan should reflect and refer to those contained within the Cornwall Local Plan, specifically, Policies 8 and 9 relating to affordable housing provision, and to the Affordable Housing SPD.

For information, the current housing need for the Parish, taken from the Cornwall Homechoice housing register is 15.

Policy	Response
Number	
H1 – Housing Development	Given the very rural nature of the Parish with few facilities and infrastructure, as well as the low housing need, the Affordable Housing Team (AHT) is supportive of the provision of only small scale housing development over the plan period.
	However the Policy appears to limit housing numbers to a 10% increase (of the existing 214 dwellings) therefore 21.4 dwellings over the 14 years. As this would include open market dwellings the AHT is concerned to ensure that flexibility is provided within this policy to support sufficient affordable housing numbers to meet identified local need where necessary.
	The NDP team is advised to note the thresholds that apply to affordable housing delivery on infill (not rural exception) sites.
	 For small scale proposals of 10 dwellings or less and where the combined gross floorspace does not exceed 1,000m², or on self-build sites, affordable housing (on or off site) and other tariff style financial contributions, cannot normally be sought. The exceptions to this are:
	• In some areas the LPA can elect to apply a lower site threshold of 5-units or fewer. In Cornwall, this can be applied to sites in: Areas of Outstanding Natural Beauty (AONBs); or Designated Rural Areas (DRAs) as defined by section 157 of the Housing Act 1985. In these areas, the Council intends to apply the lowest permitted threshold of six, which for the avoidance of doubt means anything above 5 units.
	South Hill Parish is within a DRA where the 5 unit threshold applies. Therefore, the NDP team is advised that, except on rural exception sites, any developments of 5 units or less, do not have to provide towards affordable housing, either on site or in the form of S106 contributions for use on alternative sites. Any developments of between 6-10 units will only be required to provide towards affordable housing in the form of S106 financial contributions.

	Therefore, apart from on rural exception sites, the Council can only require on-site delivery of affordable housing on developments of 11 units or more, where the target level of 35% affordable housing will apply. The NDP team is advised to consider the impact of this on the delivery of affordable housing in the area if they are seeking to support small housing schemes only.	
Economic Dev	elopment	
General comments:		
There is an understandable predictive text typo on page 9 'CAN' instead of 'CNA'.		
If a substantial goal of the Plan is to ensure the continued viability of valued local infrastructure such as the community hall, there needs to be a strategy to ensure that new residents through new housing choose to use such facilities and don't just/seek recreation elsewhere (as is the experience of many rural communities in Cornwall and beyond). This could be done with welcome packs and the potential use of planning gain to support (for example) new allotment spaces depending on garden size and affordability of new housing development.		
However, this is a clear and concise plan which suggests that the community wishes to see a bigger allocation of the non Callington housing.		
Policy	Response	
Number		
H1	This policy may inadvertently impact on any disused employment sites with an emphasis on farm buildings being converted to housing first without the opportunity to look at farm diversification or other new business opportunities.	
	Partly this depends on the skills and unemployment/underemployment profile of people in the Parish and the potential for working lives to be longer.	
	The generality of the rural worker point is welcomed as it recognises that this role can be greater than just the agricultural industry. It may need, however, a tighter definition which can be revised as the nature of economic development in the Parish becomes clearer over time.	
	Addressing tree planting is also welcome, recognising the role that the natural environment has not only on health and wellbeing; but also on the 'setting' for economic activity.	
	However, planting needs to ensure that (in time) it does not conflict with development, or development conflicts with already mature trees that offer a more valuable 'setting' and environmental role than saplings.	
B1	The encouragement of Change of Use is noted but how does this relate to housing policy? It appears that housing conversion is more desirable in the Plan than conversion to business premises; especially if the existing operation is a 'business premise' in some	

	form. Is that correct? Is there a potential conflict in policy?
	It is not clear what is acceptable in terms of traffic generation from business. There are a number of scenarios which potentially generate road traffic: - In commuting if the business operator does not live very locally - In commuting from employees/as the business starts to grow - Visits by customers and clients
	I would suggest that wider traffic and transport policies are needed to address these issues – - perhaps through greater use of public rights or way and dedicated cycle use.
	Single `quiet' uses such as a chiropractor are going to generate visitor traffic, and the suggestion in policy is that this is unacceptable.
	Flexibility in how business space can be used is also an important principle to attract operations and allow business growth on the same site. Grow on capability and the opportunity to deliver joint projects will be important: this could be something that the Community Hall could help facilitate.
B2bvi	Policy states the need for business to be located in the area to be demonstrated. This is quite open criteria. Could it be that a business may like the area, or feel that it lends a strong brand to the business?
B2bvii	Appears, again, to be the competition with housing point.
C1	As stated above, it could be that the Hall (or extension to/part of it) could be used to deliver joint project development for business.
Transport	
General comme	ents
Not a great deal from a Strategic Transportation point of view, It is unlikely that	
	mprovements to the local road network will be deliverable without
	Unclear if there are local issues that require addressing, in terms of
	example. Is there potential to use existing footpaths to link
settlements wit	hin the NDP area? Have there been public transport considerations
	Launceston and Liskeard. New development (where appropriate)
	inks to local amenities and nearby settlements through the provision
on walking and	
	What does the NDP consider unacceptable in terms of an increase
& ii. B2, a) ii &	
iii.	encourage access to business unit or businesses by sustainable means. Cycle parking for customers /employees or linking up of
Corpwall Eiro	footpaths for example.
Cornwall Fire and Rescue Service	
General comments: The parish has slightly above the County average for over residents over 65 years	
	people are most at risk of a domestic fire which is increased if the
	ve a medical condition.

The proposal for new build property should include in the design for the needs of an aging population. (Housing our ageing population report 2009 and 2016) The

inclusion of domestic fire sprinklers as a design requirement would significantly improve life safety and the environmental impact of a fire.

Legal and conformity issues

Residents operating B&B and holiday lets must ensure they are compliant with the Regulatory Reform (Fire Safety) Order 2016