Comments on Draft South Hill NDP (May 2016)

Page/Para	Comment
General	I have attached a recent copy of the Draft Rame NDP to your email. Some of the points I raise here are illustrated in this and so I thought it would be useful to you to have a look at this document.
General	In documents such as this, the usual format for paragraph numbering is 1.1, 1.2, 1.3 etc. (as opposed to a, b, c) and where the first number is the section number.
General	Whilst date of the NDP (2015-2030) is included on your contents page, this should be clearly set out on your front page and within the Introduction to your NDP, or even as a separate sub section (Plan Period) where you say its in line with the emerging Cornwall Local Plan timescales. Also, the date needs altering from 2015, to 2016-2030.
1 (a)	Introduce the abbreviation for the Localism Act 2011 as (the Act) on its first reference. So '…….contained in the Localism Act 2011 (the Act). This Act is designed…..
1 (c)	Ensure consistency with use of abbreviations throughout the document. E.g. in this section you refer to both 'NDP' and 'Neighbourhood Development Plan' – the latter should be abbreviated.
1d-h	Consider setting this out as under a separate heading as opposed to in the introduction (i.e. South Hill's NDP Process). Consider use of flow diagrams, which are also a useful means to visually set out the process you've undertaken. Flow diagrams are very user friendly and can be great a breaking up text.
1i	This reads as though it is only the views of the community that have been taken into consideration in the policy formation stage. What about other evidence which supports the community's views?
1d-i	The text refers to Survey Results being appended at Appendix A. My advice to groups is to keep the actual NDP document concise and to only include the information that a Planning Officer will need when considering an application. Any more detailed information that forms your evidence base (your survey results will form part of your evidence base, along with other information) is better presented as a separate 'Evidence Base Document' (EBD). With this EBD then being signposted from your NDP document and being made available on your website (alongside your NDP and other associated documents, i.e., Basic Condition Statement, Consultation Statement etc.) for the lifetime of your NDP. Often NDPs have a separate section signposting and explaining supporting documents (see Draft Rame NDP which I've attached to this email).
2a	This section isn't correct. The NPPF isn't guidance its legislation (the term guidance suggests weight). Also the Caradon Local Plan will be superseded by the Cornwall Local Plan; there isn't three tiers in the way that this section suggests.

	The tiers are: National (NPPF), Strategic/Cornwall Wide (at the current time the Caradon Local Plan (Caradon LP) and the *emerging* Cornwall Local Plan: Strategic Policies (LP:SP)), and then your NDP. Once the LP:SP is adopted then the Caradon LP will be superseded, there will no longer be a district policy (the districts of Cornwall no longer exist).
2b	There is a more recent version of the LP:SP which is currently at Examination (see our website: http://www.cornwall.gov.uk/media/17155253/local-plan-combined-version-jan-2016-small.pdf) so please ensure the policies are based on this and not an earlier version of the LP:SP (i.e. you refer to March 2014 version).
2d	Better to refer directly to the 'Basic Conditions' that the plan will be examined against.
2e	As comment for section 2b above
5c	"a) South Hill Parish NDP contains a series of policies, the successful delivery of which during the plan period will achieve the community's vision for the Parish." Could consider altering to "a) South Hill Parish NDP contains a series of policies, the successful delivery of which during the plan period will meet the objectives set out within this NDP and, in turn, achieve the community's vision for the Parish."
All Policies	Check all policies are in conformity with the emerging LP:SP and the NPPF and also that policies <u>do not repeat</u> elements of these higher level policies. For clarity, if policies could be considered similar to higher level policies, set out what added benefit/detail the policy wording seeks to achieve within your supporting text.

Policy H1	Policy numbering seems strange. Would recommend using the format for policy wording as follows:
	Policy ref: fine as a number (H1; B1 etc.)
	Policy criteria: would suggest alphabetical
	Policy sub criteria: would suggest i, ii etc.
	
	So, for example:
	
	Policy H1: Housing Development
	
	a. **Small-scale housing development shall be permitted at a level that is commensurate with and will help to support social and community facilities available in the Parish. This shall be developed through:**
	
	   i. **Infill development of one or two dwellings in the village, hamlets and small settlements.**
	
	   ii. **Affordable Housing where there is a demonstrated local need for affordable homes within the Parish.**

	iii. The conversion of suitable disused buildings. iv. **Housing for a rural worker where there is an essential need for a rural worker to live permanently at or near their place of work in the countryside.** b. **New buildings should be designed to blend in with existing dwellings in the immediate area. The design of new housing should normally be in traditional Cornish style where that would be in keeping with existing buildings in the immediate area.** c. **To preserve the green infrastructure which helps to give the area its unique character, all new housing development should include the planting of one or more trees, of species which are native and common in Cornwall.** d. **When buildings are converted for residential use, bat and owl boxes should be provided and installed by the developer to protect and enhance the habitat.**
H1. I	Would recommend using plainer English.
	The supporting text to this policy is weak in explaining what evidence the 10% growth is based upon. If you want to set out a level of growth for your parish the figure arrived at should be set out within policy wording - <u>remember only policy wording is acted upon</u>. It is fine to set out a growth figure but to refer to this as an 'approximate' figure, not a definitive. As currently set out it looks as if any growth level is based on weak evidence (i.e. being solely basing on community views), other evidence may include the results of a housing needs survey been carried out, past delivery rates etc.
HI. IA	Where policies refer to infill they usually include a map showing a development boundary, where infill is within this boundary. If you include a Development Boundary please don't simply adopt one from a former plan e.g. Caradon Local Plan, whilst this would be OK to use as a starting point, your evidence base would be expected to demonstrate a recent review of any settlement boundary and that there is sufficient deliverable (available and appropriate) land within this boundary to accommodate the level of growth that your plan sets out.
H1. I B, C and D	Check higher level policies
H1 II	Would it be useful to refer to the Cornwall Design Guide – you do this in supporting text but not in the policy wording (which is the bit that's acted on)? Some other groups refer to this in their policies, but be clear you

	can't dictate they follow this document as it is 'guidance' i.e. "All new homes should take steps to comply with the guidance set out within Cornwall Council's Design Guide".
H1.III	Rather than to 'preserve' should it be to 'enhance'. How about replacement trees too, where any have to be felled to allow development?
H1.IV	Why only conversions and not new development too?
Policy B1 & B2	Check higher level policies
Policy C1	For clarity, consider rewording along the lines of "Applications which ………..South Hill Parish Hall will be supported."
	Supporting text is missing.
Policy C2	"The ongoing maintenance and improvement of the children's play area ay Golberdon" does not make sense as a policy. Consider something along the lines "Applications which enhance the children's play area at Golberdon will be supported."
	The supporting text sets out it wants the facility protected. Currently, this policy doesn't protect the site. It seeks to enhance it. Rame NDP includes a policy which safeguards land (Rame NDP Policy 13: "Millbrook Lake and its surrounding green area, including the playing fields (see Figure 7), must be protected and enhanced as a public open space and amenity area.") You may want to consider similar in this instance?
Policy C3	Where is this designated as a local green space? What weight does the designation you refer to have? Maybe better to adopt a similar approach t that suggest above for C2? Refer to maps in the policy wording not only in supporting text as the site is what the policy wording refers to.