

Padstow and Trevone Neighbourhood Plan - Growth Strategy Context

Strategic Context

From Cornwall Local Plan (2010 – 2030):

Policy 2a: Key Targets

The Local Plan will provide homes in a proportional manner where they can best meet need and sustain the role and function of local communities and that of their catchment. Development proposals in the period to 2030 should help to deliver:

- 1. A minimum of 52,500 homes at an average rate of about 2,625 per year to 2030, to help deliver sufficient new housing of appropriate types to meet future requirements. In particular, meeting affordable housing needs;*
- 2. At least 318 permanent pitches for Gypsies and Travellers, 60 transit pitches and 11 plots for Travelling Show-people;*
- 3. Provide for 38,000 full time jobs and 704,000 sq. metres of employment floorspace to help deliver a mix of 359,583 sq. metres of B1a and B1b office and 344,417 sq. metres of B1c, B2 and B8 industrial premises by 2030;*
- 4. The provision of additional bed spaces within purpose-built accommodation commensurate with the scale of any agreed expansion of student numbers at the Penryn campus.....*
- 5. The provision of 2,550 bed spaces in communal establishments for older persons, including nursing and specialist accommodation.*

Policy 3: Role and Function of Places

The scale and mix of uses of development and investment in services and facilities should be based on the role and function of places. New development up to 2030 will be accommodated in accordance with the following hierarchy:

- 1. Delivery of housing, community, cultural, leisure, retail, utility and employment provision will be managed through a Site Allocations DPD or Neighbourhood Plans for the following [main towns] Bodmin; Bude with Stratton, Flexbury and Poughill; Callington; Camborne with Pool, Illogan and Redruth; Camelford; Falmouth with Penryn; Hayle; Helston; Launceston; Liskeard; Newquay with Quintrell Downs; Penzance with Newlyn, Heamoor, Gulval and Longrock; Saltash; St Austell; St Ives with Carbis Bay; Torpoint; Truro with Threemilestone; and Wadebridge.*

Development at or well related to these named towns will provide an appropriate level of affordable housing in accordance with the requirements of Policy 8.

- 2. The provision of eco-communities at West Carclaze/Baal and Par Docks with an indicative overall scale of about 1,500 and 500 dwellings respectively.*
- 3. Other than at the main towns identified in this Policy, housing and employment growth will be delivered for the remainder of the Community Network Area housing requirement through:*
 - identification of sites where required through Neighbourhood Plans;*
 - rounding off of settlements and development of previously developed land within or immediately adjoining that settlement of a scale appropriate to its size and role;*
 - infill schemes that fill a small gap in an otherwise continuous built frontage and do not physically extend the settlement into the open countryside. Proposals should consider the significance or importance that large gaps can make to the setting of settlements and ensure that this would not be diminished;*
 - rural exception sites under Policy 9*
- 4. Within the AONB or its setting, development will be supported where it is in accordance with the other policies of this Plan and can demonstrate that it conserves and enhances the landscape character and natural beauty of the AONB.*

Policy 7: Housing in the Countryside

The development of new homes in the open countryside will only be permitted where there are special circumstances. New dwellings will be restricted to:

- 1. Replacement dwellings broadly comparable to the size, scale and bulk of the dwelling being replaced and of an appropriate scale and character to their location; or*

2. the subdivision of existing residential dwellings; or
3. Reuse of suitably constructed redundant, disused or historic buildings that are considered appropriate to retain and would lead to an enhancement to the immediate setting. The building to be converted should have an existing lawful residential or non-residential use and be ten years old or greater; or
- 4 Temporary accommodation for workers (including seasonal migrant workers), to support established and viable rural businesses where there is an essential need for a presence on the holding, but no other suitable accommodation is available, and it would be of a construction suitable for its purpose and duration; or
- 5 Full time agricultural and forestry and other rural occupation workers where there is up to date evidence of an essential need of the business for the occupier to live in that specific location.

Policy 8: Affordable Housing

All new housing schemes within the plan area on sites where there is a net increase of more than 10 dwellings or where dwellings would have a combined gross floorspace more than 1,000 square metres (not including replacement dwellings) must contribute towards meeting affordable housing need.

In Designated Rural Areas and Areas of Outstanding Natural Beauty, the threshold will be more than 5 dwellings. For developments of between 6 and 10 dwellings in such areas a financial contribution in lieu of on-site provision of affordable housing will be sought per unit of affordable housing that have been provided.

Subject to considerations in policy 10 [relating to viability], developments should provide the target levels of affordable housing as set out below:

50% in Zone 1 **40% in Zone 2** 35% in Zone 3 30% in Zone 4 25% in Zone 5

The mix of affordable housing products will vary through negotiation and shall be provided taking into account the Council's evidence of housing need and any viability constraints identified, reflecting the different markets in different value zones. However, the target provision for affordable housing (other than starter homes) is typically in the following tenure proportions:

70% rented homes owned or managed as affordable housing, provided that the initial rent level (inclusive of any relevant service charges) does not exceed the local housing allowance

30% intermediate housing for rent or sale, provided that the homes are available at first and subsequent occupation at a price which is affordable to a typical local household, taking into account the estimated purchasing power in such households.

As and when by the Housing and Planning Act (2016) and subsequent Regulations, the provision of affordable housing will include an element of starter homes to meet the needs of qualifying households. Planning obligations will be used to ensure that affordable housing is provided and (where possible) retained for eligible local households.....

Policy 9: Rural Exceptions Sites

Development proposals on sites outside of but adjacent to the existing built up area of smaller towns, villages and hamlets, whose primary purpose is to provide affordable housing to meet local needs will be supported where they are clearly affordable housing led and would be well related to the physical form of the settlement and appropriate in scale, character and appearance.

The number, type, size and tenure of the affordable dwellings should reflect identified local needs as evidenced through the Cornwall Housing Register or any specific local surveys completed using an approved methodology.

The purpose of such developments must be primarily to provide affordable housing. The inclusion of market housing will only be supported where the Council is satisfied it is essential for the successful delivery of the development based on detailed financial appraisal (For example to fund abnormal development costs or to deliver a balanced, sustainable community).

Market housing must not represent more than 50% of the homes or 50% of the land take, excluding infrastructure and services.

The Council will secure the first and future occupation of the affordable homes to those with a housing need and local connection to the settlement or parish in line with the Council's adopted local connection policies.

From Cornwall Local Plan (2010 – 2030) Wadebridge and Padstow CNA Section (PP10):

Objective 1 – Housing:

Identify the level and location of new growth. Provide suitable types of housing to meet a variety of needs enable the delivery of affordable housing particularly when considering the impact of a high percentage of second homes.

Housing Requirements

*As the main settlement with good employment and transport provision, Wadebridge will be required to accommodate the majority of those dwellings. Co-ordination will be needed amongst the remaining parishes within the CNA to ensure that housing needs are met. **The Council will support the preparation of Neighbourhood Plans as a way of planning for the needs of those areas.***

Padstow is a popular second home location but retains a strong community identity. Particular challenges for these towns and for the CNA in general include ensuring that a supply of affordable housing is available, reducing the impact of second home ownership and increasing access to local services and facilities.

From Cornwall Site Allocations DPD (submitted)

1.5 Cornwall Council has committed to creating, or supporting the creation, of community-based strategies for its larger settlements, whether this is through the Allocations DPD and/or through Neighbourhood Plans. At the forefront are the 17 towns / conurbations / sites that are listed within the Cornwall LP:SP with their own housing and economic targets.....

Penzance & Newlyn, St Ives, Hayle, Camborne-Pool-Illogan-Redruth, Helston, Falmouth and Penryn, Truro, Newquay, St Austell, Eco-communities (West Carclaze/Baal and Par Docks), Bodmin, Wadebridge, Liskeard, Launceston, Bude, Torpoint and Saltash

1.6 Six of these towns identified do not have specific sections within this document: St Ives; Truro; Wadebridge; Liskeard; Bude-Stratton; and Torpoint. Five of these towns informed Cornwall Council that they wish to produce their own Neighbourhood Plans that will include allocations and/or policies to address how the Cornwall LP:SP targets will be delivered. The remaining area, Bude-Stratton, will be the subject of a separate Site Allocations DPD.

As well as the named towns, there are many other Neighbourhood Plans that are at various stages of development that will support the delivery of the Community Network Area targets within the rural parishes of Cornwall.

From Cornwall Annual Monitoring Report, Dec 17:

The figures for housing completions since the beginning of the plan period are outlined below:

2010/11	2,060
2011/12	2,375
2012/13	2,278
2013/14	2,040
2014/15	2,702
2015/16	2,536
2016/17	3,074

As at the 31st March 2017 there are 26,347 homes with planning permission.

Local Plan Requirement 52,500 (2,625 pa)

<i>Five Year requirement (2,625 x 5)</i>	<i>13,125</i>
<i>Plus, shortfall of 1310 (18,375 – 17,065)</i>	<i>14,435</i>
<i>Less Unlawful dwellings where no further action (235)</i>	<i>14,200</i>
<i>Five-year requirement plus 5% buffer</i>	<i>14,910</i>
<i>Total Supply capable of being delivered within 5 years</i>	<i>18,573</i>
<i>Supply as a percentage of Five Year Requirement 124.6%</i>	
<i>Years Supply 6.2</i>	

The Cornwall Housing Implementation Strategy August 2017 provides details of progress towards meeting the Local Plan targets for each main town and Community Network Area. The following table taken from this report provides an update to Table 2 in the Cornwall Local Plan:

Location Wadebridge & Padstow CNA residual

Proposed Housing Allocation	1,000
Completions 2010-17	487
Planning Permission Not Started and Under Construction	324
Windfall on sites of less than 10 homes 2022-30	224

Completions since the start of the plan period at 70 per year have exceeded that required in the local plan and existing supply in terms of permissions should enable this trend to continue over the next 5 years. This will mean that the local plan target can be met, with a surplus, through delivery from windfall in the last 8 years of the plan period.

A Neighbourhood Plan has been made at St Eval parish that allocates a site for 100 homes. This has now been granted planning permission. Neighbourhood Plan Areas have been designated at Padstow, St Endellion and St Minver Highlands and Minver Lowlands. **It is not yet known whether allocations will be made at Padstow and St Endellion, but the intention is that the St. Minver Lowlands Neighbourhood Plan will make allocations for between 100 to 150 dwellings to be phased over the plan period.**

The breakdown of allocated housing in neighbourhood plans at the time of writing is as below. Where the total for a neighbourhood plan is zero, this indicates that although the plan outlines how much housing is to be provided, none is specifically allocated and will instead be sourced by other means, such as windfall, infill or rounding off.

Bude-Stratton	0	Gwinear-Gwithian	0	North Hill	0
Quethiock	0	Rame Peninsula	0	Roche	200
Roseland Peninsula	0	St. Eval	100	St. Ives	350
St. Minver	150	Truro and Kenwyn	0		

Padstow Housing Growth Targets

1. The scale of future development is to a large extent determined by the Local Plan. You are advised by the local planning authority that the minimum number of new dwellings required to be built in the Parish area of Padstow, the period 2010-30, i.e. “your fair share”, should be **29% of the strategic target for Wadebridge and Padstow Community Network Area**, which equates to 290 dwellings.
2. Taking completions since 2010 (142 dwellings) and current commitments (95 dwellings)¹ into account “the parish area’s share of the remaining Local Plan target” is **53 dwellings**. This figure, you are further advised, should be regarded as “the minimum requirement (your baseline Local Plan housing target) and starting point for deciding whether additional homes are required”.
3. Neighbourhood Plan policies can choose how they seek to guide where these new houses are accommodated. “Once you have established your NDP draft housing target the preparation of your NDP policies will seek to guide how these new houses are accommodated. It is worth noting that you can come back at a later stage in your NDP process and revise your NDP housing target should it be required and based upon further evidence (hence why we refer to it as your NDP’s ‘draft’ housing target at this stage). Remember that the process of developing your NDP is an iterative process; its elements can alter as you progress and learn more about your area and the wishes of your communities.”²

¹ Figures provided by Cornwall Council 2nd July 2018

² From Housing Statement Guidance, Cornwall Council, 2017

Figure 1: Determining your NDPs Housing Target (Flow Diagram)



Local Housing Needs

4. It is appropriate that Cornwall Council asks you to consider whether you want to plan for additional houses over the amount set out to conform to the Local Plan. You have an agreed aim “to understand and prioritise local housing need” with associated objectives to:
 - ensure development contribute towards meeting local housing needs
 - prioritise access to affordable housing
 These may have significant implications for the Neighbourhood Plan.

5. The Housing Needs Survey that was undertaken on behalf of the Town Council in February 2018 revealed that there are (spring 2018) 143 applicants on the Homechoice Housing Register, who are looking for an affordable home for rent, and/or registered with Help to Buy South West seeking to buy an affordable home in the parish area. The survey data also indicated that there are an additional 34 ‘hidden’ households who would like an affordable home but are not currently registered with the Council.

6. The Housing Needs Survey 2018 makes a number of recommendations to consider “*through the ongoing development of the Neighbourhood Development Plan (NDP):*”
- *With 92% of respondents supporting or may support affordable housing led development and an identified registered and surveyed housing need, requiring to be met, the NDP may wish to consider the allocating or zoning land for housing / affordable housing development. Undertaking a site finding exercise to demonstrate capacity and how the need will be met.*
 - *Affordable housing delivery should cater for both affordable rent and intermediate homes for sale, reflecting the results of this survey and the registered local housing need.*
 - *In addition, the survey identified support for self-build – this could be explored further to understand the context and need; perhaps investigating not only self-build but other forms of community lead development including Community Land Trust delivery.*
 - *Finally, there was support for an NDP policy regarding Principle Residency, suggesting there is backing locally for the issue to be explored further through the NDP process.”³*
7. The affordable housing yield from current commitments is estimated to be 47 (circa 50% of the 95 dwellings committed by not yet built). The potential yield from further housing development, not yet committed could be at least 21, (40% of 53). The Steering Group needs to consider whether 68 additional affordable dwellings over the period to 2030 is sufficient; and whether a total of 148 new dwellings in the Padstow area between 2018 to 2030 is enough to ensure that the housing market does not get any more exclusive or discriminatory and remain largely inaccessible to local people. If that scenario is a real fear, then the Steering Group needs to consider what can be done in terms of housing development targets and other policies in the neighbourhood plan to realise a more acceptable future.
8. The Neighbourhood Planning Toolkit⁴ advises that neighbourhood plans should seek to meet the housing needs of both local people and future incomers, with an ‘uplift’ on the Local Plan target, to allow for additional dwellings for local people or new incomers, if required by local circumstances. The PPG⁵ offers guidance on a general basis on how neighbourhood planners should determine the quantity of housing needed. It suggests you do so by assessing the range or the average of the housing projections for the plan period from various quantitative sources, and then adjust them upwards or downwards based on specific ‘market signals’ such as house prices, rent levels and rate of development. Unfortunately, Padstow is not a conventional or easily controllable housing market. It is however extremely predictable, in that if houses are built, then many people will want to buy them.
9. There is evidence and justification in the Padstow area to apply, or seek to apply, constraints on who can buy and occupy the new houses. The Neighbourhood Planning Toolkit advises however that restrictive policies of this type are best avoided. Any proposals for new properties to be offered to local residents before being sold on the open market (through planning policy or condition) is not supported by national policy. In theory the neighbourhood plan could encourage (rather than require) local developers to market their homes in this way, but it is highly unlikely that a developer would voluntarily seek to impose restrictions on the sale of their houses, and even encouragement (as an alternative to compulsion) is **contrary to the spirit of national policy. At local authority level, statutory guidance reiterates that councils do have the discretion to determine who qualifies for an allocation of social (i.e. affordable rather than market) housing, including those with a local connection and working/community contribution. Many councils have used these powers to prioritise low income households with a family member in work and those deemed to be making a ‘community contribution’.**
10. At the Cornwall Local Plan Inquiry, the Inspector showed concern about the acquisition of future new dwellings as holiday/second homes removing those dwellings from the stock available for local

³ <https://www.cornwall.gov.uk/media/32375304/padstow-housing-needs-survey-final-report.pdf>

⁴ Housing Needs Assessment at Neighbourhood Plan Level - *A Toolkit for Neighbourhood Planners, Locality, 2016*

⁵ PPG = Planning Practice Guidance

needs. He concluded “it is reasonable to assume that the proportion of holiday homes will not decline over the plan period”. On this basis, the Inspector calculated, that based on past trends, a 7% uplift in the overall housing target across Cornwall was justified in this instance to make up for those new houses ‘lost’ from the overall provision through use as second or holiday homes. That degree of overall uplift may not be sufficient for the Padstow area.

11. Policies restricting the sale of new dwellings for second homes have successfully been introduced in St Ives, the Rame Peninsula and Mevagissey for instance, where the issue is demonstrably a major one. The impact the policy will have on the overall housing market is yet to be determined however. Second homes aren’t being banned. Instead, ‘principal residence’ conditions are being put in place on new builds, which prevents ‘outside’ buyers from coming in for them. But it does nothing to prevent the bulk of the housing stock being targeted by second-homers, many of whom probably prefer the traditional cottage to a new build dwelling.
12. If you decide that affordable housing need locally is significantly higher than being provided for by the Local Plan policies, then facilitating affordable housing exception sites may be the most effective approach.

Land Supply

13. A significant influence on policies must be the availability and suitability of land for development. Cornwall Council regularly undertakes a Strategic Housing Land Availability Assessment (SHLAA) to keep abreast of available development land. The exercise is based on a ‘call for sites’, which are subsequently assessed as to their suitability for development. The 2016 up-date identified five areas of land in the parish area that were considered suitable for housing development (subject to planning permission):

S373a	Land at Trecerus Farm	158
S373b	Land at Trecerus Farm	60
S090	Land at Trevethan Farm	92
S135	Dobbin, Lane, Trevone	12
S623	Land at Trevone “SW89484 75690”	<u>88</u>
	Total:	410



14. The implications of this exercise are:
 - there is more than sufficient available land to meet the strategic housing target of the Local Plan
 - there is sufficient land identified via the SHLAA to meet an ‘uplift’ in numbers should the Neighbourhood Plan set a higher target
 - the local planning authority, having identified these sites as suitable for development, will be inclined to consider favourably a planning application for their development, unless the Neighbourhood Plan’s policies negate this through its criteria or by favouring other sites

Brownfield Land

15. In planning for growth, you should remain mindful of the opportunities that may exist to re-use previously developed land thus reducing the potential loss of greenfield areas. The NPPF⁶ encourages the effective use of land by *“reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value”*. The new NPPF is likely to be even more encouraging.
16. Since 2017⁷ the Government has required all local planning authorities to maintain a Brownfield Register. The purpose of these registers is to provide up-to-date, publicly available information on brownfield land that is suitable for housing. This, it hopes, *“will improve the quality and consistency of data held by local planning authorities which will provide certainty for developers and communities, encouraging investment in local areas. Brownfield registers should include all brownfield sites that are suitable for housing development irrespective of their planning status”*⁸.
17. Cornwall Council has established a register of brownfield land exceeding 0.25ha which is suitable, available and achievable for residential-led development. Residential-led means mostly self-contained dwellings, which can include flats. The Register must be updated at least annually.
18. The Register is in two parts. Part 1 comprises sites which, based on best available information, are considered suitable, available and achievable. Part 2 will be a subset of Part 1 and will comprise those sites which Cornwall Council decides to grant ‘permission in principle’. Permission in principle is a new route to consent, which together with technical details consent will form an implementable permission.
19. At June 2018, no sites in the Padstow area were on the Register. (The nearest registered site is the Farmers Arms, B3276 Between Harlyn Road and Towan Road, St Merryn.) This does not mean that there aren’t any suitable sites in the Padstow area. Cornwall Council *“welcomes information on sites - whether this relates to a site within the register or an additional site”*⁹. Sites can only be considered for the Register if they meet the set criteria. The land must:
 - **meet the definition of brownfield land**¹⁰
 - **have the potential for at least 10 dwellings (0.25ha or more)**
 - **be located within an existing settlement (based on the latest Cornwall Settlement Hierarchy)**
 - **NOT be within a designated SAC, SPA, SSSI or Flood Zone 3b**

⁶ NPPF = National Planning Policy Framework, 2012

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

⁷ Following the introduction of The Town and Country Planning (Brownfield Land Register) Regulations 2017

⁸ <https://www.gov.uk/government/publications/brownfield-registers-and-permission-in-principle/brownfield-registers-and-permission-in-principle-frequently-asked-questions>

⁹ <http://www.cornwall.gov.uk/brownfieldregister>

¹⁰ *“Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes:*

- *land that is or has been occupied by agricultural or forestry buildings;*
- *land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures;*
- *land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and*
- *land that was previously-developed, but where the remains of the permanent structure have blended into the landscape in the process of time”* NPPF, HM Government 2012

Site Allocations and the Neighbourhood Plan

Neighbourhood Plan Options

20. Neighbourhood plans can identify and allocate sites for all kinds of new development including housing, employment, business use, leisure and other forms of development. They can also protect and safeguard land for future uses (for example open spaces) and define development boundaries or settlement limits for those places where some further growth may take place.
21. Regarding housing and employment land, the larger, strategic, development sites should be identified and allocated by the Local Plan or a Site Allocation DPD, which has to identify sufficient developable sites to ensure there is an adequate long-term supply of land to meet the development requirements of the county and each community network area. You have to accept the strategic development allocations within your neighbourhood area, once the DPD has been adopted.
22. No strategic allocations have been made by the local planning authority for the Padstow parish area nor indeed for any part of the community network area. The Steering Group has to consider how the Neighbourhood Plan can be best used to ensure the agreed 'strategic target' is met and the right type of development takes place in the right places. The options open to Padstow's neighbourhood planners regarding the identification of additional development sites are:
 - Work with the local planning authority to put in place a **Strategic Approach** to Site Allocation
 - Take a **Local Approach** to Site Allocation
 - Adopt a **Criteria-Based Approach** to Site AllocationThe implications of each option are described below:

Strategic Approach to Site Allocation

23. **Meaning:** The local planning authority identifies and allocates specific housing sites so that the minimum number of dwellings required in its Local Plan is delivered on those sites, ensuring that they have certainty that the overall number across its area will be delivered. Allocating sites does not mean that no other development will come forward on other sites.
24. **Implications**
 1. The local planning authority has to go through consultation and statutory requirements to get proposals adopted ('agreed'). If it is advanced enough, the neighbourhood plan process can be used to influence the location of the housing sites
 2. The necessary Strategic Environmental Assessment¹¹ (SEA) is done by the local planning authority
 3. The resources and expertise needed to make the allocations is already in place to ensure that the local planning authority's 'strategic' quantum of housing development is deliverable. There is no additional resource or time burden placed on the Town Council or Steering Group
 4. The Neighbourhood Plan can still have policies which set the local 'ground rules', for things like the design, density and other standards for allocated housing sites and also 'criteria based' policies for helping to determine the suitability or not of planning application proposals for development if submitted for sites which have not been allocated
 5. Working with the local planning authority to allocate housing sites in the Local Plan or accompanying Development Plan Document (DPD) can save a Steering Group a lot of time and resource, particularly if the process of understanding development site opportunities and constraints is already underway
25. In the case of Padstow, this option is probably a non-starter. The Site Allocation DPD is almost complete. The strategic target for the area is relatively small, and the choices limited. The option is only included here for completeness and in recognition of the fact that it remains a potential policy

¹¹ SEA is a procedure (set out in the Environmental Assessment of Plans and Programmes Regulations 2004) which requires the formal environmental assessment of certain plans and programmes which are likely to have significant effects on the environment. Allocating sites for development would trigger the need for an SEA to be produced.

option for nearby Wadebridge, despite the statement in the Site Allocation DPD that Wadebridge, Egloshayle and St Breock wish to include site allocations in its Neighbourhood Plan.

Local Approach to Site Allocation

26. **Meaning:** The community decides that it would like to allocate housing sites in its neighbourhood plan, rather than leave it to the local planning authority and the planning process. The numbers cannot be lower than those identified in the Local Plan for the area, but the neighbourhood plan can increase them if supported by evidence.
27. **Implications**
1. It is likely to take longer to do, if a plan includes housing allocations; and will require a thorough and robust site identification and appraisal exercise, including a local 'call for sites'
 2. It will require additional focused consultation on housing sites to consider development options
 3. A Strategic Environmental Assessment (SEA) will need to be done (or commissioned) by the Steering Group
 4. Undertaking a SEA requires additional time, resources and expertise to ensure it is robust and capable of resisting challenge by developers or other stakeholders (but can be funded by Government grant)
 5. A SEA has to meet certain procedural requirements (e.g. local planning authority 'screening opinion', 'scoping' report, 6-week consultation with Government agencies...)
 6. Allocating sites can 'put you in the driving seat' when it comes to identifying preferred locations for housing, although the outcomes may not be any different to those reached if the local planning authority undertakes the allocations process
 7. The Steering Group needs to be prepared to 'take the rough with the smooth' when it comes to discussing views on housing with the community

Criteria-Based Approach to Site Allocation

28. **Meaning:** Neither the local planning authority nor the neighbourhood plan allocates specific housing sites. Policies are set to protect areas of the parish and/or settlements, which have particular social, environmental or economic value or importance to the community, from inappropriate development. The policies will be used by those determining planning applications to assess the suitability of proposals and can help to guide development to appropriate locations if proposals come forward during the lifetime of the plan.
29. **Implications**
1. You will need to have robust evidence to support any policies or designations you wish to have in the neighbourhood plan
 2. It should be quicker to produce your plan if you do not set development allocations but develop criteria-based policies
 3. You can focus on as few or as many of the topics that are important to you and your community
 4. You have a local set of planning 'rules' to make sure that if development does take place in your parish, that it is in the places where you will find it more acceptable and will be of a type, scale and form that the community approves. You can use your policies to support your comments in response to planning applications
 5. A SEA is unlikely to be required, but a Sustainability Appraisal (SA) could still be done to test the impact of your policies
 6. You can give any Design Statement real 'teeth' (or 'weight') by having a policy which requires it to be seriously taken into account

Settlement Limits and Boundary

30. Defining settlement limits and delineating a boundary or boundaries is a policy device that can be used by a neighbourhood plan, in tandem with either a 'site allocation' or 'criteria-based' approach. A settlement boundary should reflect the area where a set of plan policies are to be applied. It should be used to have a positive influence by identifying where development will generally be acceptable as well as controlling and limiting where development should take place.
31. The legislation allows communities to decide for themselves if it makes sense to have a settlement boundary around their towns and villages, and if so, the extent of that boundary. The Steering Group should consider whether a settlement boundary for either Padstow or Trevone would be an appropriate method to help deliver the right type of development in the right places over the next 15 years.
32. In general, there is a presumption in favour of development within the settlement boundary. Any land and buildings outside of the boundary line are usually considered to be countryside where development would be regulated with stricter planning policies. However, it should be noted that any land which has been included within the boundary line does not have a guarantee of approval of planning permission, as there will be other planning policies which will need to be adhered to also, for example; the protection of the character of a settlement.
33. *Advantages of settlement boundaries*
- Certainty: with a 'black line' plotted on a map it is easy to identify the 'settlement' from 'open countryside'
 - Locally, settlement boundaries will be an understood and accepted planning tool for guiding and controlling developments
 - Ensure a more plan-led and controlled approach to future housing growth, allowing for allocating sites within the settlement(s) rather than windfalls
 - Protects the countryside from unnecessary development and prevents ribbon development
 - Co-ordinated and consistent approach, providing a firm basis for refusing planning applications which are unacceptable in planning terms
 - Allows for more certainty to developers/land owners with sites/land within the boundary, if they adhere to all other plan policies
 - Allows the development of small sites which cannot be identified as allocations
34. *Disadvantages of settlement boundaries*
- Increases land values within the settlement boundary
 - Increases hope values for land adjoining but outside the boundary
 - The use of settlement boundaries has led to criticism that they result in cramming within the settlement, as every available area of land competes for development resulting in a potential reduction in the landscape quality and character of that settlement, unless other policies are in place
 - Settlement boundaries can be crude and inflexible
 - The character of properties and the settlement could be altered if development is allowed within the gardens of these houses within a settlement boundary

Defining a Settlement/Built-Up Area Boundary

35. It is important that the boundary should take account of development and commitments that have occurred since the previous boundary was set. It should also include sites that are allocated in development plans (unless they are detached from the settlements and designated as exception sites).
36. The basic approach to defining the settlement area is illustrated by a set of draft principles below. Consistency is the key. The principles once agreed will need to be applied consistently when defining settlement boundaries and where judgements are made these will need to be noted.

Principle 1:

37. The boundary will be drawn tightly around the built-up areas and, where possible, will follow defined features such as walls, hedgerows, paths and roads and other lines of communications that are likely to have a degree of permanence.

Principle 2:

38. **Boundaries will include:**
- a. Buildings and associated land that make up the settlement area, including recent new development
 - b. Existing commitments for built development i.e. unimplemented planning permissions (unless there is real doubt that they will be implementable within the plan period)
 - c. Buildings on the edge of settlements which relate closely to the economic or social function of the settlement e.g. churches, community halls etc
 - d. Important amenity areas which form part of the character of the settlement
 - e. Curtilages which are contained and visually separated from the open countryside and are clearly part of a network of buildings that form part of the built-up area
 - f. Site allocations in the LP or NP – but not those subject to an exception site policy
 - g. The entire part of a dwelling and attached outbuildings, but not necessarily those that are physically separate

Principle 3:

39. **Boundaries will exclude:**
- a. Important gaps
 - b. Playing fields or open space at the edge of settlements (unless such open spaces are surrounded by the built-up area of the settlement and they are to be designated as open space to protect them from development)
 - c. New allocations for affordable housing
 - d. Isolated development, or individual groups of dwellings, or areas of business/employment, which are physically or visually detached from the settlement
 - e. Farm buildings or agricultural buildings on the edge of the settlement which relate more to the countryside than the settlement
 - f. Large gardens and other open areas which are visually open and relate to the open countryside rather than the settlement
 - g. Large gardens or other areas whose inclusion or possible development would harm the structure, form and character of the settlement
 - h. Camping and caravan sites unless in year-round permanent residential use
 - i. Agriculture, forestry, equestrian development, minerals extraction, landfill, water features, public utilities (sewage treatment plants, substations)

Principle 4:

40. Boundaries do not need to be continuous. It may be appropriate given the nature and form of a settlement to define two or more separate elements.

Principle 5:

41. Property ownership boundaries should not form the basis for defining the built-up area. The key is, the visual openness of the land and whether it relates best to the built-up area or countryside.