

Neighbourhood Planning CC Officer Consultation Response Template

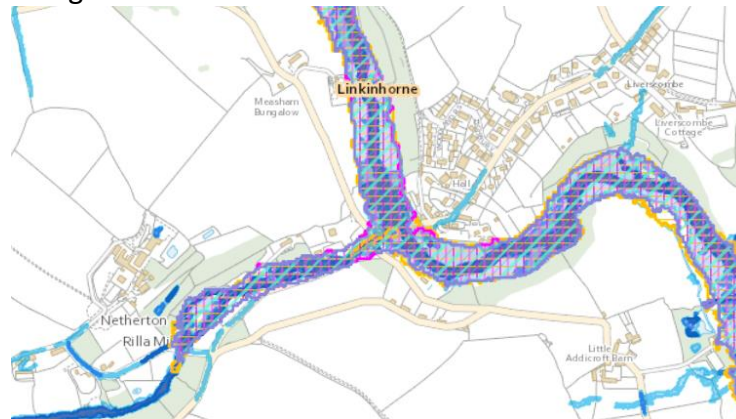
Please can you complete the template when responding to the Council Officer Consultation for the draft Neighbourhood Development Plan Proposal. Once the consultation period has ended the comments will be feed back to the Neighbourhood Planning Steering Group, where minor amendments can be made to the 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 neighbourhoodplanning@cornwall.gov.uk

Cornwall Council Response	
Neighbourhood Development Plan Proposal	Linkinhorne draft NDP
Consultation documents	Linkinhorne draft NDP pre-submission draft
Consultation Start Date	29/3/20
Consultation End Date	28/6/20
Cornwall Council Team	Response Date
Affordable Housing	
Development Management	
Development Management – Area Team	
Economic Development	
Education Infrastructure	
Environment Service - Ecology	
Environment Service – Flood and Coastal Environment Officer	Dionne Jones, Catchments and Coast team, 26/6/20
Environment Service - Open Spaces Officer	
Environment Service- Landscape	
Environment Service- Forestry	
Historic Environment	
Local Plan Team – Community Infrastructure Levy	
Local Plan Team	
Cornwall Fire and Rescue Service	
Transport	

Response	
General	<p>The NDP is clear and succinct. There are no major issues from my perspective. The community, distinctiveness, economy and visual impact aspects of the NDP are well covered. I'm encouraged that the people of Linkinhorne parish value their landscape and green spaces so highly.</p> <p>Whilst climate change mitigation is considered, the NDP could do more to promote climate change adaptation and resilience in the parish, particularly if there is an older population and a greater dependence on the local road network for access to services. Likewise more consideration could be given to enhancing biodiversity within the parish.</p> <p>I've made a few suggestions below for minor edits to help strengthen these aspects of the plan.</p>
1.7	<p>1.7 Cornwall County Council – please delete 'County' (that was the name of one of the predecessor councils before the unitary authority, "Cornwall Council", was formed). <i>Linkinhorne NDP team agreed and revised NDP document.</i></p>
Policy GP1 Sustainable development	<p>Suggested minor edits in purple to strengthen alignment with the 'environment' aspect of the sustainable development principle (e.g. biodiversity):</p> <p>"Conserving the special environment in which we live – for residents, visitors, and local businesses and wildlife."</p> <p>"Ensuring that development improves the climate resilience of buildings, and infrastructure and habitats to climate change and improves the energy efficiency of buildings and infrastructure through proposals which are sensitive to local character and distinctiveness."</p> <p><i>Linkinhorne NDP team agreed and revised NDP document.</i></p>
Climate Resilience	<p>I welcome the positive policies in support of climate change mitigation measures like energy efficiency, renewable energy, electric car infrastructure and locating new development close to existing village centres. Significant action to reduce greenhouse gas emissions needs to be taken by 2030 (the period of this Neighbourhood Plan) to avoid the worst impacts of climate change.</p> <p>The climate change resilience aspects of the NDP could be strengthened. NPPF states that new dwellings must be sustainable for 100 years and new commercial buildings for 50 years, which means planning decisions in the parish must consider a much longer timescale than 2030. The main climate change vulnerabilities in Linkinhorne parish are likely to be flooding, storm damage and wild fires. As well as a fluvial flood risk along the rivers Lynher and Inny, there is a surface water flood risk in numerous low points around</p>

the parish. Climate change is expected to increase the incidence of rapid intense rainfall events, with surface water run-off from bare fields and the moor being a particular risk in this agricultural parish, potentially blocking drains with silt and obstructing the rural road network. Removing hedges could exacerbate this risk. The Neighbourhood Plan could encourage new developments to make use of open green Sustainable Drainage Systems (SuDS) where appropriate. Connected, multi-functional green spaces, hedges, trees, water features and landscaping all have an important role to play in reducing local flood risk to communities, whilst supporting the climate change resilience of wildlife.

The main flood risk area within the proposed development boundaries is along the river at Rilla Mill:



New development in flood risk areas would conflict with policy GP1 and should be discouraged.

Further guidance is available in the following Neighbourhood Planning Guide Notes for:

- **Climate Change:** <https://www.cornwall.gov.uk/environment-and-planning/planning/neighbourhood-planning/preparing-a-neighbourhood-plan/neighbourhood-planning-guide-notes-and-templates/#-tab-359260>
- **Flooding and Drainage:** <https://www.cornwall.gov.uk/environment-and-planning/planning/neighbourhood-planning/preparing-a-neighbourhood-plan/neighbourhood-planning-guide-notes-and-templates/#-tab-359262>

The main areas at risk from surface water and fluvial (river) flooding can be viewed on Cornwall Council's *interactive mapping website* at [Cornwall Council's interactive mapping website](#)

Cornwall Council *Sustainable Drainage Policy*: [Cornwall Council Sustainable Drainage Policy](#)

Cornwall Local Flood Risk Management Strategy provides further information and guidance around which policies can be formulated. The

	<p>strategy is being refreshed this year. See: Cornwall Local Flood Risk Management Strategy</p> <p>The NDP could include a policy that encourages new buildings to be designed to the Building with Nature standard. See: Building with Nature standard</p> <p>Ideas and steer for policy wording could also be drawn from the Cornwall Environmental Growth Strategy and the draft Cornwall Design Guide at:</p> <p>Cornwall Design Guide</p> <p>Cornwall Environmental Growth Strategy</p> <p><i>Linkinhorne NDP team noted comments and felt this was covered by other planning document.</i></p>
<p>1.2 and Policy GP3 Redevelopment involving demolition of buildings</p>	<p>I support the steer towards infill and brownfield development. With infill or replacement housing there is a risk of the size of gardens being reduced or gardens being replaced with hard surfacing for parking. This could reduce habitat connectivity and increase surface water run-off. The policy guidance could be strengthened by adding that, “Replacement dwellings should maintain and preferably enhance habitat connectivity and local flood resilience by retaining trees and green corridors and using permeable surfaces.” This would align with Cornwall Environmental Growth Strategy and Cornwall Local Flood Risk Management Strategy, both material considerations for planning.</p> <p><i>Linkinhorne NDP team agreed and revised NDP document.</i></p>
<p>Policy LW1 New farm buildings</p>	<p>Given the Dark Skies designation I suggest a policy or guidance requesting a Lighting Impact Assessment for larger developments or developments in sensitive areas.</p> <p><i>Linkinhorne NDP team agreed and revised NDP document.</i></p>
<p>Policy LW2 Field and parcel boundaries – hedgerow removal</p>	<p>I suggest the guidance explains that Cornish hedges are included within this definition, whether tree or grass-topped (both have high biodiversity value). Either refer to “hedgerows” and “Cornish Hedges” or use the catch-all term “hedges” to cover both.</p> <p>The habitats and wildlife corridors hedges provide are not quickly replaced. They are also a key part of the parish’s distinctive and irreplaceable historic landscape as well as natural climate change resilience features.</p> <p><i>Linkinhorne NDP team agreed and revised NDP document.</i></p> <p>Policy LW2 only considers mitigation of removed hedges and could be misinterpreted as encouraging hedge removal. It could provide better protection and be strengthened to align with the <i>Cornwall Environmental Growth Strategy</i> by positively encouraging the enhancement of hedges – e.g. “Proposals that retain and enhance existing hedgerows and Cornish hedges will be supported.”</p>

	<p><i>Linkinhorne NDP team agreed and revised NDP document.</i></p> <p>Enhancement could mean repairing gaps or damage to existing hedges, connecting new and existing hedges to expand wildlife corridors and increasing public appreciation of the value and distinctiveness of Cornish hedges.</p> <p>There are some useful resources on Cornish hedges here: Resources on Cornish hedges</p>
Energy	<p>I support the positive approach to carbon reduction and appreciate that it has to be balanced with heritage and local character considerations.</p> <p>Encouraging energy use to be minimised before renewable energy is considered is good practice and will reduce the size of renewable energy systems needed. There could be an appendix or some supporting information about the <i>Energy Hierarchy</i> to help raise awareness of the full range of design solutions and technologies possible:</p> <ol style="list-style-type: none"> 1. <i>Lean</i>: Reduce energy demand (e.g. passive-solar design, triple glazing, air tight, thermal mass, thermal stores, sun pipes, natural ventilation, motion activated lights). 2. <i>Mean</i>: Use energy efficiently (e.g. LEDs, A* rated appliances). 3. <i>Green</i>: Use renewable energy (e.g. solar, wind, hydro, geothermal, bioenergy, combined with battery storage for extra resilience). 4. <i>Clean</i>: Use low carbon energy sources and systems (e.g. heat pumps, CHP). <p>Fossil fuels should be avoided – they emit greenhouse gases and will make communities vulnerable to energy supply chain failures and price rises. Fuels that have to be delivered (oil, LPG, wood) are not good for security of supply during prolonged extreme weather events.</p> <p><i>Linkinhorne NDP team noted comment.</i></p>