

FOREWORD

I realise that this submission is probably much more detailed than anticipated for this consultation (as evidenced by the very small amount of space provided on the official response forms), but hope that time can be found to read and consider it in full, especially as it has taken a lot of my limited time and energy and thus reduced my potential self-employed income. I would much rather not need to carry out such unpaid work, and my disability means that it is very tiring, but my observation of many appalling planning decisions by NCDC which have damaged the environment and people's quality of life, including my own, has led me to the view that I must do whatever I can to stop such things happening in future. Such bad decisions have continued despite the highly-critical 1993 Lees report (Lees, Audrey, 1993, "The Lees Report: Enquiry into the Planning System in North Cornwall", HMSO, London). A particularly grotesque example was the construction of a multi-storey car park in a Launceston conservation area.

I moved to my present home on the outskirts of Launceston due to the fact that it was surrounded by fields and was therefore quiet and wildlife-rich. One of those fields is now covered in houses and the detritus of continuing construction work, and has now been a source of intrusive noise five and a half days a week for three years, often starting at 0730. It would appear that very few of these new houses are 'affordable', and therefore the quality of life of existing residents has been seriously damaged for the sake of speculative building which will simply attract more in-migration. This practice **MUST STOP**.

I am now seriously considering leaving Cornwall due to the relentless de-ruralisation which has occurred since I moved here in 1984. An acquaintance is already trying to leave with her family for these reasons.

.....

I find the hierarchy of documents and consultations rather impenetrable, and had difficulty identifying and locating the parts of documents referred to in other documents in the time available.

I have commented on the contents of the document in the order in which they occur. It means that there is some repetition.

I regret that there has not been time to check this submission fully for errors or to verify all the statements which I make herein. Hopefully the authorities concerned will have the resources to do this, perhaps with the aid of the links which I have provided.

Draft Core Strategy

You may assume that I agree with, or have no strong feelings about, the parts of this document on which I have not commented below.

GENERAL

I disagree totally with the policy of *directing* development. I believe strongly that the policy should be to *facilitate* development in response to local need ***throughout the district***, not just in the more rural parts. I use the relative term “*more rural*” as there seems to be a widespread misunderstanding of the nature of the district, which is inconsistent with national designations.

According to documents downloadable from

<http://www.statistics.gov.uk/geography/nrudp.asp>

the only North Cornwall wards which are designated as urban are in Bodmin, and Policy 16 of the Cornwall Structure Plan 2004 states: “Development should be focused on the Strategic Urban Centres (Bodmin, Camborne-Poole-Redruth, Falmouth-Penryn, Newquay, Penzance, St Austell and Truro) according to their role and function, and on Saltash and Torpoint in South East Cornwall.”

It would appear that legislation and guidelines relating to urban locations are being erroneously applied to the overwhelmingly-rural district of North Cornwall.

The policy of directing development seems to be to be a kind of micro-management which is contributing to the concreting over of this beautiful district. I do not understand why it is deemed acceptable to do this, yet not to enact strong measures to reduce the scandalous proportion of houses which are empty or underused (most particularly second homes).

The micro-management of development, apart from having adverse impacts on the character of the district, must be enormously expensive, representing a significant proportion of the increasingly-unaffordable burden on council tax payers. The vast plethora of documents referred to in the SEA/SA (which presumably has to be paid for by council-tax payers) show substantial overlap and duplication (especially the more-local ones), and I cannot help wondering how much of this mountain of paperwork is actually necessary or helpful.

Whilst councils probably have limited power to change the system under which they work, I hope that the current norm of directing development can be resisted as much as possible, and that NCDC will instead survey communities on their needs and operate simply as a mediating, facilitating and controlling body.

The North Cornwall Local Development Framework (LDF) Draft Core Strategy dated September 2005 states that the Cornwall Structure plan “requires provision to be made for about 5,100 dwellings over the period 2001-2016.”

According to documents obtainable from

<http://www.emptyhomes.com/resources/statistics/statistics.htm>

in 2003 there were

467 empty homes (1.18%) in North Cornwall in 2003 *and*
122 homeless households in North Cornwall in 2004.

From the percentage figure, there are $(100/1.18 \times 467)$

= 39,576 residential properties in North Cornwall.

According to <http://news.bbc.co.uk/1/hi/england/cornwall/2974508.stm>

there were 4,900 second homes in North Cornwall in 2003.

On page 22 of the SEA/SA document it states:

Vacant dwellings: 2.9%

Second resident/holiday accommodation 8.2%¹³

Thus, according to these figures, a total of 11.1% of residential properties in North Cornwall are unused or underused. If the figure of 39,576 residential properties is correct, there are 4,393 empty or underused.

Thus it would appear that there is an environmentally-friendly alternative to concreting over increasing proportions of this beautiful district and effectively killing the goose that laid the golden egg with what could be termed “development blight”.

On page 15 of the SEA/SA document it states that the population of North Cornwall is 83,000. On pp 21-22 of it states that there are 38,628 household spaces in North Cornwall. This is similar to the figure calculated from the Empty Homes Agency’s stats, and, using the percentage of empty or underused homes given in the SEA/SA document, there are

$38,628 \times 11.1\%$

= 4288 empty or underused homes. This is

$4288/5100$

= 84% of the new homes requirement (5100) given on page 22 of the SEA/SA document for the period 2001-2016.

Also according to page 22, there are just 2826 homes (1626 with planning permission + 1200 remaining requirement), out of this 5100, which have not yet started to be built. The number of empty/underused homes is

$$4,288/2,826$$

= one and a half times the number on which construction has not yet started. Thus it is one and a half times the number claimed to be needed.

If we ignore the second homes, there are still

$$38,628 \times 2.9\%$$

= 1,120 completely empty homes, which is

$$1,120/2,826$$

= 40% of the number claimed to be needed and on which building has not commenced.

When one takes into account the fact that only 50% of the proposed new housing is to be 'affordable' (much of the remainder is probably speculative and will result in increased in-migration of people of whom a high proportion will be retired, thus exacerbating the existing demographic imbalance), the number of completely-empty homes represents

$$1,120/(2,826/2)$$

= 80% of the number of affordable homes claimed to be needed and on which building has not commenced. Those empty homes which are too large to fall into the "affordable" definition could be divided into smaller units, thus further increasing the yield without the need to blight the character of the district with more construction.

If, in addition to these completely-empty homes, just 1706 of the second homes were brought into full use, it is clear that no new homes need to be built to meet the needs of people already living in North Cornwall. Using the more-modest estimate of the percentage of second homes given in the SA-SEA (as opposed to the BBC figure), the actual number of second homes is

$$38,628 \times 8.2\%$$

= 3,167 homes, so fewer than 54% of these would need to be brought into full use in addition to the completely-empty homes to meet the full stated requirement, which appears excessive anyway, as calculated above.

More data on second homes:

<i>location</i>	<i>Proportion of Dwellings that are Second Residences/Holiday Accommodation</i>
Padstow	28.2%
St Endellion	33.9%
St Merryn	44.9%
St Minver Highlands	37.8%
St Minver Lowlands	44.2%

Table 1 Percentages of second/holiday homes in parts of North Cornwall

Source: www.ncdc.gov.uk/media/adobe/r/8/Second%20Homes%20in%20North%20Cornwall.pdf

Bringing second and empty homes into full use will:

1. Avoid the need to build new properties, which risks damaging the character of the area as well as damaging the natural environment;
2. Revitalise the original communities so that local shops and services become viable all year round again, which will boost the local economy in a sustainable way.

This is not just an issue of environmental destruction but also of social cohesion and economic and community sustainability. The high proportion of second homes has led to communities becoming deserted in the off-season, leading to the loss of shops, pubs and other facilities due to non-viability. It has led to shortages of volunteers for lifeboat services, as year-round residents cannot afford to live near the sea. It must be tackled, and the need is urgent.

As North Cornwall has a high percentage of self-employed people, I would prefer to see the words “employment” and “jobs” replaced with more appropriate, inclusive terms, such as “paid work”.

.....

A. Introduction

Section 4: Strategic context for the local development framework

National Planning Policies:

National planning guidance gives four broad objectives, which according to the Draft Core Strategy “have to be achieved at the same time”. Unfortunately, one of these objectives is inconsistent with the others, with the “principles of sustainable

development” which they are stated to encompass, and even within itself. Thus, right from the start, the government has set an impossible task. North Cornwall District Council will therefore have to decide which of these four broad objectives to pursue, as it cannot possibly meet them all.

My own preference would be to disregard part of the one which is so inconsistent: “maintenance of high and stable levels of economic growth and employment”. This objective would be consistent with the others, and internally consistent, if the words “economic growth and” were omitted. Economic growth cannot be both high and stable, as there are environmental and social limits to economic growth. If high levels of economic growth were to be pursued, NCDC could not have any hope of achieving the other objectives, thus disregarding this part of this objective would be the best way to facilitate the achievement of the largest possible proportion of the objectives, and thus the achievement of sustainable development, which must be the overriding goal.

Cornwall Structure Plan 2004

On pages 4-5 of the Draft Core Strategy it is stated that “Bodmin is identified as a Strategic Urban Centre on which development should be focused in North Cornwall. Elsewhere development opportunities are enabled on a diminishing basis to accommodate locally generated needs in the villages.” This is a little unclear, and on first reading appears to treat everywhere other than Bodmin as a village, where development should only occur in response to local need. It talks of development opportunities being “enabled”, which strengthens this impression. It therefore comes as a surprise to read later in the document that development is to be *directed* in the smaller towns, and that numerical goals for housing provision are given for these towns.

North Cornwall Community Strategy

Under the theme “Individual well being” (ignoring for now the poor grammar), the aim that the people of North Cornwall “adopt healthy lifestyles” sounds a little prescriptive. Replacing “adopt” with “enjoy” would remove this impression.

The subsequent related text talks of “ensuring that people in North Cornwall have healthy lifestyles”, which is similarly prescriptive and also unfeasibly utopian. The insertion of the words “are able to” after “North Cornwall” would improve this. There is then a spelling error where the word “personnel” is used instead of “personal”.

North Cornwall District Council “Our Community Commitments”

Priority 2: Quality jobs

The last objective: “Jobs with pay rates at least on par with the national average” is unsustainable. If every authority achieved pay rates at or above the national average, the national average might rise excessively fast, which is unsustainable. Many, perhaps most, people (myself included), are content with a *reasonable* income, which meets their basic needs and prevents hardship. In a district such as North Cornwall, income is not the

dominant basis of well-being/quality of life. People are drawn to live in the district by its relatively unspoilt environment, not by high incomes.

Better wording would be “...pay rates close to the national average”.

.....

To redress the lack of consistency between the headings in Sections B and D, and to make the sections more relevant and inclusive, I would rename the headings as follows:

“Affordable Housing” should be changed to “Housing”.

“Quality jobs” should be changed to “Quality work” (so as to include the high proportion of people in North Cornwall who are self-employed)

“Waste reduction and recycling” should be changed to “Environmental sustainability”.

“Healthier lifestyles” and “Dynamic communities” should be amalgamated under a heading named “Flourishing communities”, “Social cohesion” or similar.

Some renumbering may be required in Section D to achieve this reordering.

.....

B. Issues to be addressed in North Cornwall

On page 8, re point (g) for “Quality jobs(/work)”, I would prefer the wording “adequately-paid work opportunities” to “well-paid employment opportunities”, for reasons given above.

On the same page, what is meant by “economically active” in point (h)? Incomers tend to be wealthier than residents – this is why in-migration causes house-price inflation. Unless they do not spend much time in the district, incomers may be *more* economically active than longer-term residents by dint of being more wealthy, so the point may be incorrect.

In point (j) I would prefer the word “work” to “employment” for reasons given above.

There should be more details in the section “Waste reduction and recycling” (after renaming it), such as sustainable construction, which is referred to under “Healthier lifestyles”.

As the LDF is supposed to be founded on the aim to make development sustainable, it is surprising to see so little detail about environmental sustainability in Section B. Nothing is sustainable unless it is environmentally sustainable. As stated on page 7 of the SEA/SA: “The goal of sustainable development is to enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life without comprising the quality of life for future generations.”

This means, for example, that account needs to be taken of the cradle-to-grave history of the production, transportation and use of construction materials, and the same applies to waste.

Under “Dynamic communities” I would add “including facilitation of community self-help” or words to that effect. The council does not need to fulfil all a community’s needs directly, but can provide context, advice and resources to enable people within the community to provide many of them.

C. Spatial Strategy

1. Spatial vision for the district

I would add the word “social” to the second sentence of point (a) thus: “...in relation to locally-determined physical, economic, environmental and social issues.”

In the shaded box on page 10, I would change “at least as high as” in the second point to “close to”, for reasons given above. I would also change “training and employment” to “education, training and work”.

To the fourth point in the shaded box I would add “including the underlying causes” at the end.

2. Spatial strategy

Development strategy

(c) As I have stated in my comments on the SEA/SA, I agree with its criticism in Clause 6.13: “...it is uncertain why Launceston has been identified as the main focus of growth alongside Bodmin. This is contrary to both regional and county guidance. The text would benefit from a further explanation and evidence base to support Launceston as a major growth centre.” I too would appreciate an explanation for this.

In the same point there is the statement: “At Padstow, opportunities for development will be limited to provision which meets local business and community needs in the interest of maintaining a sustainable and diverse community.” I cannot see any rationale for not applying this policy *throughout the district*. If development is *not* to meet local business and community needs, what and whom *is* it for? Has this been properly addressed?

(d) Again, there seems to be an implicit indication that outside the more rural parts of North Cornwall (see my comments under “GENERAL” near the beginning of my submission for justification of the term “more rural”) there is **not** the need or intention to “facilitate and promote sustainable patterns of development and sustainable communities”.

(e) I would like to see mention in this section of prioritising the use of empty and underused buildings before considering newbuild.

Employment and economic development

I am pleased to see the term “economic development” here instead of “economic growth” and would like to see this term substituted throughout.

(f) I would like to see “well paid jobs” replaced with “adequately-paid work” and the insertion of “educational and” before “training opportunities”.

(g) I would like to see “employment” replaced with “work”.

(h) I do not agree that it is desirable for the rural economy in all areas to grow. There are many wealthy people in the countryside, but also many poor people. What is needed is to enable the poorer people to have a fairer share of the wealth provided by the district’s resources, thus reducing disparities between rich and poor and thereby improving community cohesion, which is an aim of the Draft Core Strategy. Net economic growth may be needed in more deprived areas, to bring them up to the standard of the better-off ones, but not everywhere.

Residential development and affordable housing

(k) There is reference to “sustainable locations”. It is far from clear what this means, and clearer wording is needed.

(l) I am pleased to read that “...it is essential that development is reflective of the housing needs of the district. Priority will be given to the delivery of affordable housing.” However, this seems to be at odds with other parts of the document, and particularly with the fact that only 50% of new housing provision is required to be affordable. How can making the affordable requirement a mere 50% be described as “prioritising”? It is wrong to permit developers to put profit before the good of the district, but I cannot see why else the affordable requirement is so low.

(m) There is reference to “a requirement for a realistic proportion of new development to be provided as affordable housing”. Does the council have a definition of “realistic” or does it allow this to be determined/dictated by developers? There also needs to be a definition of “exceptions sites” in the glossary.

Sustainable rural communities

(o) Does the council have an agreed definition of “the rural part of the district”? If so, this should be in the glossary. Without a definition, it is hard to judge the parts of the strategy which use the term. Also see my comments about definitions of “urban” under “GENERAL” near the beginning of my comments on the Draft Core Strategy. I have already stated my views on the directing rather than facilitating of development. I consider the statement: “Development boundaries are defined at major villages, within which new market housing will be enabled on a one to one basis with affordable housing” completely unacceptable and it is inconsistent with the stated objectives of prioritising affordable housing. A one-for-one policy may simply permit the blight of non-sustain-

able growth and in-migration, which is destroying the character of so many parts of the district, to continue.

(r) “Developer contributions will be appropriately sought to ensure adequate infrastructure provision is delivered in step with development.” I am opposed to the system of “planning gain” due to the risk of bribery, corruption and over-provision of unaffordable housing. The typical scenario appears to be: Council wants affordable housing. Developer wants maximum profit. Council permits a low percentage of new dwellings to be affordable in return for provision of infrastructure. Thus twice as many houses are built as are needed/affordable by the local community, thus the more expensive ones are bought by relatively-wealthy incomers (thus potentially inflating their price in relation to local incomes, so that when locals want to move up the housing ladder they cannot afford to) and the population grows at a rate which is environmentally unsustainable and detrimental to the character of the locality. In 1978, county councillors decided that the optimum population for Cornwall was 378,000. In 1990 it had already exceeded 464,000, and by 2002 it was 506,100. The latter figure was obtained from

<http://www.cornwall.gov.uk/index.cfm?articleid=7650>

Such population increases cannot be sustained without serious detriment to the environment which residents and visitors find so appealing. They are killing the goose which laid the golden egg, and they are being fuelled by speculative construction.

I would like to see NCDC thoroughly explore alternative ways of facilitating the provision of housing which is of the type needed by local residents. One way might be to provide low-cost mortgages/loans for locals to renovate existing buildings. Another would be to encourage and facilitate self-build of eco-homes, and developing a presumption towards granting permission for eco-homes and eco-villages would encourage the construction of these low-impact, maximally environmentally-sustainable developments. There would be little or no need for “planning gain” as such developments often automatically include the necessary infrastructure, and there would be no risk of the potential “bribery” element which arises when there is conflict between the aims of councils to provide affordable housing and the aims of developers to build the most profitable types of dwelling.

Houses can actually cost very little to build, and removing the involvement of profit-hungry development companies means that all money goes directly into the cost of construction. Another option is to facilitate shared ownership, for example with housing associations.

Infrastructure should normally be provided out of government funding at the appropriate level.

Environmental protection and enhancement

(u) This states that “It is recognised that the needs of the rural part of the district will vary from those in the more urban areas where alternatives modes of transport are available or can reasonably be enhanced.”

As even the towns have quite low population density, and as a large proportion of travel is between the towns and the more rural areas, I believe that similar alternatives to the private motor vehicle, such as demand-responsive services, are appropriate in all parts of the district..

D. Spatial Objectives

I have addressed the poor arrangement of points under headings above. The wording of the points is also rather poor.

Affordable Housing

Strategic Objective SO1 refers to “sustainable locations”. It is far from clear what this means. Does the phrase “net additional dwellings” include bringing existing dwellings into full use? If not, it should.

Strategic Objective SO3 is to “Ensure a mix of housing is provided in new development that meets community needs and includes an appropriate amount of affordable housing.” This conflicts with Strategic Objective SO4 which specifies an affordable housing yield of 50%. This may be insufficient for local needs, and will simply lead to in-migration to fill the unaffordable dwellings, which will perpetuate the unsustainable population growth which is already blighting the district.

Strategic Objective SO4 is also internally inconsistent. It starts by aiming to “Target future dwelling provision to meet the needs of local people...” This will probably not be achieved through the low “affordable” target of 50%. I am interested to note that this objective is for such targeting to apply in both “urban” and “rural” areas (I have used inverted commas for reasons given above re the nature of the district, viz. that, in the whole of the district, only two Bodmin wards are in fact urban). The objective (apart from the reference to 50%) appears at face value to mean that *only* local needs will be taken into account, whereas policies elsewhere show that local needs constitute only a proportion of the criteria for housing provision, the rest presumably to be determined by the profit-driven “needs” of developers, which I consider unacceptable. I realise that councils are to some extent hamstrung by national guidelines and the current conventions of directing development and using commercial development companies, but I believe that with, a little imagination and by consulting appropriate experts, councils could facilitate the provision of **genuinely** appropriate, sustainable housing provision.

Quality Jobs/Work

Strategic Objective SO5 is to “Deliver employment-led regeneration, wealth creation and economic growth across North Cornwall”.

- (1) The word “employment” should be replaced by “work” for reasons which I have detailed above.
- (2) Economic growth is only required in the deprived parts of the district. This will reduce the disparities which are inimical to social cohesion. If the word “sustain-

able” were inserted before “work-led” and the term “economic development” were used instead of “economic growth”, the wording would be fine.

Strategic Objective SO6 is to “deliver economic development opportunities...through regeneration and new site development.” I would prefer to see the wording “through regeneration and, if necessary, new site development” and would like to see the word “sustainable” inserted before “economic”.

Objective SO9 refers to “sustainable economic growth”, which I would like to see replaced with “sustainable economic development”. I would also like to see the word “employment” replaced with “work”.

I agree broadly with the gist of Objective SO10, but not the terms “create”, “employment” and “growth”, and would reword it thus: “Facilitate the creation and maintenance of a balance between work opportunities and housing.”

Waste reduction and recycling (to be changed to “Environmental sustainability”)

I agree with Objective SO12 but would like to see the addition of a clause to the effect that improved opportunities to use alternatives to private cars will be secured to meet existing needs, and adequate additional provision will be secured before further housing or work-related development is allowed to take place.

Objective SO13 refers to *directing* development. As I have said earlier, I consider that the council should *facilitate* development which arises from local need, not *direct* it. Another concern here is that there is no caveat to the effect that development should not occur in areas which are rich wildlife habitats or where they would damage other aspects of the district’s environment, such as historical features, social cohesion, tranquillity, air quality, etc.

Objective SO15 only aims to provide 40% of new housing on previously-developed land, which is less than the national target of 50%. This is much too low, especially in view of the high prevalence of empty and second homes in the district (see my comments, calculations and Table above).

Healthier lifestyles (change to “Flourishing communities” or similar)

There is a degree of tautology in Objective SO16, where it refers to both education and lifelong learning. Better wording would be “education, including lifelong learning”.

Objectives SO19 and SO20 should be under “Environmental sustainability”. There is also repetition of the aim to protect the natural environment – it is mentioned in both SO19 and SO20.

Dynamic communities (these Strategic Objectives can be incorporated under the previous amended heading)

Objective SO22 refers to “community, environmental and infrastructure provision”. What is “environmental provision”? Rewording is needed for clarity. I note that the objective also makes a commitment that “capacity is not degraded as a consequence of further development”. Does this refer just to infrastructure? If so, it should be clarified, and there should be an objective to avoid environmental degradation as well.

Re Objective SO23, I would like to see added an undertaking to facilitate the creation of additional provision where local need is identified.

I agree with Objective SO24 except that I would replace the word “accommodate” with “facilitate” and remove the word “rural” as I believe that the principles should be applied across the district.

I disagree with Objective SO25 on the grounds that I do not support economic growth except in the most deprived areas of the district. I also do not believe that there needs to be any damage done to the natural or historic environment, as there are plenty of existing buildings which can be brought into full use to supply the need for housing and workplaces. If the reference to “growth” includes population growth, please see my comments and references above.

E. Core Policies

Policy 1: Sustainable development

1. This refers to the aim of minimising energy consumption. This is one of the many areas in which renovation is far superior to newbuild. Here are some stark statistics:

“To transform a terraced house to a high modern standard uses the same energy as driving a car from London to Moscow and back. To demolish that house and build a new equivalent uses the same energy as driving the identical car six times around the world.”

Source:

<http://www.telegraph.co.uk/property/main.jhtml?xml=/property/2005/10/08/prlost08.xml&sSheet=/property/2005/10/12/ixpmain12.html>

(d) “To minimise the consumption of natural resources” needs to be changed. Sustainable consumption of **renewable** natural resources is not detrimental; indeed, it provides the basis for a great deal of economic activity in the region, and has the potential to provide more, as it includes the production of food, timber, craft materials, biofuels, etc. I would recommend new wording “To minimise the consumption of non-renewable resources and use natural resources sustainably”, or “prudent use of natural resources” or “sustainable use of natural resources”. The current wording risks encouraging the use of

non-renewable synthetic materials such as plastics instead of wood, for example, which would be highly undesirable environmentally.

On the same page (18), under “To ensure the delivery of this policy we will”, the point beginning “consider the transport implications...” should be changed as follows: add the word “only” between “development” and “where”. I think that I would also remove “the resultant”, so that it is clearer that adverse impacts are unacceptable.

On the same page, re the last point, I would change “the” before “loss” to “any”, again emphasising the fact that adverse impacts are unacceptable. I would add a final point: “halt work immediately in the event of any such loss or impending loss in order for damage to be prevented, minimised or remediated”.

Policy 2: Development Requirements

2. In the hierarchy for the sequential approach, the first option should be to bring empty and underused buildings into full use. If this were implemented rigorously, there would probably need to be no newbuild at all. The target of 40% on previously-developed land is much too low, being lower than the national target.

3. Due to the above, I am not convinced of the need to release 42-46 hectares of land for general employment and business park use.

Under “To ensure the delivery of this policy we will” I would add “and not exceeded” at the end of the first point.

Rationale: properties were provided at a higher rate than anticipated from 2001-4. According to Clause 3.25 of the SEA/SA, “...as of March 2004 the District had met the requirements identified in the Structure Plan and had indeed exceeded the implied rate of development set within the Plan for the period up to 2004, averaging 510 dwellings per annum from 2001-2004 as opposed to 340. The reason for the high building rates is that the district had had to take time to adjust to a lower level from the rate specified in the previous Structure Plan provision of 425 dwellings p.a.”

This does not actually make sense: 510 is 20% above the previous Structure Plan provision, so the rate cannot really be explained with reference to this. I would be interested to know the actual reason for this high rate.

The point “Monitor the provision of residential completions are commitments delivered on allocated sites and windfall sites” does not make sense. Should “are” be “and”?

In the last two points on page 19, I would like to see the word “employment” replaced with a more-inclusive term. Perhaps the phrase “industrial and employment land” could be replaced with “industrial and other work-related land” and “employment development” could be replaced with “development of work opportunities” or similar.

Policy 3: Locational Strategy

I agree with the first phrase of part 1: “Development will be located to address social and economic needs” and interpret this to mean that it will occur in response to needs stated by local residents. I do not agree that location is necessarily relevant to energy consumption, the need to travel or the use of greenfield sites. If housing, work, services and transport are provided in response to local need, there will be a balance between them which reduces the need to travel. There should also be no differential use of energy between sites as long as local materials are used/reused and small-scale renewable energy generation is installed. Provision of modes of transport other than private motor vehicles should be facilitated for all types of location and should develop according to local need.

I agree with the first phrase of part 2: “Sustainable development opportunities will be enabled within the district’s towns” but this does not seem to be the council’s policy, which is to direct rather than enable, illustrated by the ensuing text which specifies in detail where and how development must take place. I agree with the SEA/SA where it queries the selection of Launceston as a focus for growth: Clause 6.13 states: “...it is uncertain why Launceston has been identified as the main focus of growth alongside Bodmin. This is contrary to both regional and county guidance. The text would benefit from a further explanation and evidence base to support Launceston as a major growth centre.” I too would appreciate an explanation for this, especially as on page 47 of the SEA/SA it is stated in relation to housing that “Launceston has experienced high levels of growth...”

In my view as a resident, this growth has already been excessive.

In the bullet points for part 2 there is reference to “balanced development”. Again, the way to achieve this is to enable it to arise in response to local need. Imposing development is almost certain to lead to imbalance, which then requires yet more intervention to try to redress it. It is perhaps analogous to the situation with modern pharmaceuticals: one drug causes an imbalance (evidenced by side-effects) which have to be countered with another drug, and so on until multiple physiological systems are out of kilter, with serious adverse implications for the patient.

I am not sure whether the slightly-different wording on page 20 regarding the relationship between local need and development for different communities is deliberate or not, but the subtle differences lead to potential problems for interpretation.

For example, for Padstow the wording is “additional development in Padstow will be focused on addressing locally generated needs.” (The word “additional” appears to mean in addition to development in the previously-mentioned towns rather than additional to other provision in Padstow, but this is unclear.) For the major villages in part 3, the wording is “development will be primarily permitted to address local social or economic needs.” For part 3(i), the wording is “new residential development will be restricted to accommodation which will meet a local resident or employment generated housing need” and for part 4 it is “Residential provision will be enabled to deliver housing which will meet a local resident or employment generated housing need.”

Much, possibly all, of this different wording appears to have identical meaning. If this is the case, the wording should be standardised to avoid confusion.

Policy 4: Affordable Housing

Part 1 refers again to a 50% development yield of affordable housing. For reasons given above, I do not consider this to be anywhere near enough. I do not understand why, having established this percentage, the draft core strategy goes on to specify hectarages and dwelling numbers to meet the affordable requirement. The numbers and hectarages appear, in any case, to be extremely small, especially in light of the fact that they are to be “negotiated in association with all or part of developments”. My fear is that this could mean that an estate of, say, 100-200 dwellings may only have to include 5 affordable properties, which would be totally unacceptable.

Part 2(b) appears to acknowledge this, as it refers to the release of sites, including on an exceptional basis, “if affordable housing needs are not being met as a result of yields from sites which qualify to deliver such housing.”

This need not happen, and must not be allowed to happen. If enough empty and underused homes are brought into full use, no newbuild will be needed at all, communities will be revitalised and no more natural habitat will be destroyed.

I agree strongly with part 3 about the reuse of existing buildings. Although I have resisted correcting all the grammatical errors in the consultation documents, a hyphen **must** be added between “accommodation” and “yielding” as, without it, the meaning is completely different, and it took me a while to understand what was intended. As it stands, it appears to refer to accommodation which yields tourism proposals!

Part 5 of the policy appears to be stating something specific but it is very unclear what this might be. Is it intended to include things like ensuring that the affordable dwellings are preferentially available to local people who most need them, and/or ways of preventing inflationary price rises and/or controlling the sequence of occupation of each dwelling? It needs to be worded more clearly.

I would like to see “and not exceeded” added to the end of the second bullet point for part 4, for reasons given above..

Policy 5: Economic development

I do not know what is meant by “high value” employment opportunities (part 1 on page 24). Does this refer to monetary value, value to society, or does it have another meaning? Like Oscar Wilde, who said that a cynic knows the price of everything but the value of nothing, I believe that there is excessive emphasis on monetary value over all else. As elsewhere, I would like to see the word “employment” replaced by “work”. For reasons given in my comments above regarding ‘North Cornwall District Council “Our

Community Commitments” Priority 2: Quality jobs’, I would prefer a term such as “reasonably-paid” or “adequately-paid” rather than “well-paid”.

I would prefer the wording “development proposals which are conducive to a sustainable local economy” to “development proposals which diversify the local economy”. Whilst in natural systems diversity tends to correlate with sustainability, this is not always the case for human activities. I would hope that the council would not favour, for example, a proposal for a factory producing cigarettes or disposable luxury plastic products over one for organic horticulture or renewable energy generation, even if the former scored more highly on a diversification scale.

Work should be appropriate to the locality, and this may sometimes militate against a particular proposal which would increase diversity. Locally-appropriate work is also conducive to maintaining and enhancing local distinctiveness, as opposed to the district becoming akin to a clone of many other areas as a result of an excessive focus on competition.

A more appropriate criterion than diversity would be sustainability, especially environmental sustainability. Alternatively, a requirement for environmental sustainability could be added as a caveat.

In part 2 of Policy 5, I would like to see “employment” replaced with “work-related” or a similar inclusive term, for reasons given above..

In part 3, I wonder what criteria would be/are used to determine whether provision of something is “demonstrably inadequate”. Is this to be determined on a purely monetary basis? I would hope not, for reasons given above.

In the second bullet point of part 5, I would add “and/or over-provision” after “adequacy”. Over-provision of particular kinds of work opportunities could trigger excessive and unsustainable in-migration. Again, the word “employment” would be better replaced with “work-related”, “work-generating” or similar.

Policy 6: Environmental Protection and Enhancement

The opening sentence seems excellent, but I wonder how “unacceptable harm” is defined?

I am pleased to see that “unacceptable harm” would not be expected to be caused to the character and quality of local landscapes and the wider countryside or to local distinctiveness, character (some repetition here), townscape and setting of settlements. I assume that this is a new policy, as the harm done to the character and landscape of the Kensey Valley in Launceston is unacceptable to a substantial body of people, as evidenced by substantial, well-founded and determined local opposition. This destruction has caused great distress to residents on both sides of the development, for whom the beautiful semi-wild landscape was highly valuable. The problem here was not the *type* of development as much as the designation of this greenfield site as a development site in the first place.

I trust that the above policy will be allowed to over-ride any existing development site allocations where evidence comes to light that development *per se* would harm the character, landscape, distinctiveness, townscape or setting in a way which was unacceptable to local people.

The photo below is of this greenfield site within Launceston before it was destroyed.



After (e) there is reference to “the benefits of development”. Is this well-defined? For example, whose benefits are taken into account? If the policy of reusing empty and underused buildings is adopted, and of using local materials in a sustainable way, I would not anticipate any harm to the features listed. Indeed, bringing underused buildings back into use is likely to enhance/revitalise them.

The second bullet point should not apply only in the countryside, so I would advocate removing the phrase “that is required in the countryside”.

The third bullet point: “Continue to work with developers and partners to secure the protection, conservation and enhancement of the natural and built environment in North Cornwall” fills me with dismay, as it suggests that NCDC considers that this is already being achieved. Turning wildlife-rich fields into a sea of mud and rubble does not, by my own definition and that of others living nearby, constitute protection, conservation and enhancement of the natural environment. Converting a tranquil view across fields and a river into a housing estate does not constitute protection, conservation and enhancement of the natural environment. The bullet point leads me to fear that the optimistic wording at the beginning of Policy 6 may not be meant to be taken literally. I do so hope that I am wrong.

The last bullet point on page 25 refers to defining “character areas” having regard to “landscape assessments”, “in partnership with other relevant authorities”. Just as many doctors now regard patients as the greatest authorities on their illnesses, local residents

could perhaps be regarded as the principal experts on the character and value of their local landscapes and townscapes. After all, that is the reason why many of them live where they do: “location, location, location”. So I hope that NCDC will consider including local residents in “relevant authorities”.

I am concerned over the tenor of **Policy 7** due to the apparent reliance on developers for a range of services which are the proper remit of local, regional and national government. In my view, this presents far too much scope for bribery, blackmail and corruption. I believe that much inappropriate development may already have been allowed as a result of developers offering such inducements.

F. Implementation and Monitoring

Core Strategy – key indicators

Under the Strategic Objective of “Affordable Housing”, on page 28, I believe that an additional indicator should be “surplus provision” or similar. I presume that references to “dwellings” relate to those available for habitation, so can include existing properties which have been made available for full occupancy following a period of non- or sub-optimal occupancy. If not, they should do.

Under “Targets” for this section, I am concerned about the use of the term “new housing”, which would appear to exclude the bringing into full use of empty/underused properties.

As I have stated above, the 50% affordable target is too low. I would also remove the word “rural” with regard to the proportion of new housing to address local and affordable needs.

The issue of empty and underused homes should be included in the penultimate bullet point, thus: “Diminishing proportion of unfit, empty and underused dwellings to total dwellings”.

Incidentally, I would be very interested to know what proportion of housing is needed, by residents of the district, to be affordable. An internet search has produced the information that NCDC has been carrying out a survey to this end, but I was unable to find out easily *when* this was carried out and whether it is complete.

Under “Quality Jobs/Work”, there are too many uses of the word “employment” and “jobs” to note, and these should be changed to a more-inclusive term such as “work”, for reasons given above.

I think that there should be a requirement to monitor and take account of the likely increase in home-based working, as this will reduce the need for dedicated work-related land. This is relevant to, for example, the target of “No net loss of appropriately located employment land”. The provision of land should be determined by need, and in case need falls, there needs to be monitoring of the level of *over*-provision. If there is over-

provision, it is desirable for work-related land to be lost if, for example, it can be used to provide locally-needed housing, or be returned to nature.

Also in Targets for Quality Jobs/Work on page 28 is a reference to “implied annual rate” and “B1 development”. These should be defined in the glossary.

In “Targets” for the second section under “Quality Jobs/Work” (page 28) there is again reference to increasing diversity. As I stated above, whilst in natural systems diversity tends to correlate with sustainability, this is not always the case for human activities. Work should be appropriate to the locality, and this may sometimes militate against a particular proposal which would increase diversity. A more appropriate criterion than diversity would be sustainability, especially environmental sustainability. Alternatively, a requirement for environmental sustainability could be added as a caveat.

Point 3 of “Quality Jobs/Work” talks of focusing economic development and growth in “sustainable location(s)”. I have criticised the latter term above. I do not think that a location can be described as “sustainable”. A major determinant of sustainability is whether people can access work without using private motor vehicles, which will depend on whether there is sufficient suitable work close to/at home and/or accessible via sustainable transport modes. This applies to **any** location. Thus the indicators should be the locational matching of work opportunities to potential workers and how/how far/whether they need to travel to work. Local people need to be surveyed to see what kind of work they can/wish to do. Traditional rural occupations and crafts must not be neglected – they can be highly sustainable as well as maintaining and enhancing local distinctiveness.

Waste Reduction and Recycling (to be changed to a more suitable heading as detailed above)

Re point 2, as I have stated above, the target of only 40% of housing to be provided from previously-developed sites is much too low and is even lower than national targets. It presumably means that 60% of new housing provision is to involve the destruction of greenfield sites. This is not consistent with protecting the natural environment which is such a distinctive and vital aspect of the district, and which Core Policy 6 claims that it **will** protect.

Point 3 needs to be changed to something like “energy sustainability” as it includes reference to renewable energy, which is not conservation. Under “Partner/implementation organisations” should not there be inclusion of the energy companies, the Energy Saving Trust at <http://www.est.org.uk/>

the Centre for Alternative Technology at <http://www.cat.org.uk>

etc.? Other bodies which could benefit from, and contribute to, energy sustainability in a big way include health trusts, by improving the energy performance of their buildings and equipment. As we are talking about development, developers themselves need to be engaged in ensuring that buildings are energy-efficient and, ideally, incorporate renewable energy generation. Much can be learned from projects such as BedZed – see

<http://www.bedzed.org.uk/main.html>

and Hockerton – see <http://www.hockerton.demon.co.uk/>

Perhaps some more clearly-defined targets would be desirable for this objective

For point 4, Sustainable transport, again, the list of “Partner/implementation organisations” should include more specialists in these matters. I would suggest Transport 2000 – see

<http://www.transport2000.org.uk/>

Sustrans – see <http://www.sustrans.org.uk/>

and Living Streets – see <http://www.livingstreets.org.uk/>

I disagree strongly with the target of increasing concentration of social and employment activities in “accessible locations”.

See my comments above on Point 3 of “Quality Jobs/Work”. You are essentially advocating centralisation, which is not sustainable or socially desirable as it increases the marginalisation of those in less-populated areas, can increase travel and puts excessive pressure on the natural environment in areas targeted for the concentration of development and activity.

Healthier Lifestyles (to be changed as suggested above – perhaps to “Flourishing Communities” and amalgamated with the following section)

On page 30, under point 2, “number of retail units converted to other uses in the primary retail area” is listed as an indicator of “town centre vitality and viability and regeneration”, and the associated target includes “No net loss of the primary retail area to non retail uses” and “Increase in gross retail floor space in town centres”. I am not convinced of the need for more retail space, at least in Launceston. As many businesses already struggle to break even, more retail space may increase supply excessively and consequently drive existing retailers out of business. Increasing retail provision also risks increasing the number of people travelling from other areas to shop there, which is also unsustainable. Unless NCDC is considering reducing the level of retail provision outside the town centre (and this has already *increased* dramatically in the past few years) I cannot support the target of increasing retail space in town centres.

Clause 5.46 of the SEA/SA asks: “Will there be mixed use development to encourage more sustainable patterns of growth?”

Thus the council needs to decide whether it sees mixed-use development as a benefit or a disbenefit. As most retail activity ceases in the evenings, mixing retail and residential units can help to prevent areas becoming deserted at such times and therefore reduce

crime, as well as making maximal use of buildings. Residential units above shops can have lower energy needs through acquiring heat rising from the shops. Mixing retail and residential units can also reduce the need to travel.

Re point 3, there appears to be a conflict in the “target” column which advocates: “Maintain/reduce current incidence of development within protected landscapes”. Not only is this internally inconsistent, but it also conflicts with the strategic objective, which is to “secure the protection and enhancement of the district’s built and natural environment” and with the indicators “maintenance of protected landscapes” and “maintain the quality of the district’s listed buildings and conservation areas”. How can these be achieved if the current incidence of development within protected landscapes is **maintained**?

Dynamic communities (to be amalgamated with previous section)

In “indicators” for part 1, what is meant by “20 minutes travel time”; in other words, by what mode of transport?

In part 2, I presume that “need demonstrable local needs” should read “meet demonstrable local needs”. This entry (after correction) and that in the “target” column (“Delivery of affordable and local needs housing consistent with demonstrable need”) are examples of wording which *appears* to mean that development will **only** take place in response to local needs, when in reality it seems that only a modest proportion will be of this nature, with the remainder only serving to produce profit for developers, and in the process perpetuating the unsustainable in-migration which drives prices up, drives young locals out, and causes totally-unnecessary environmental destruction.

.....

COMMENTS ON OVERALL CONSULTATION PROCESS

Whilst I am delighted to have the opportunity to comment on development issues, there does appear to be a high level of error in the documents, which has made the process extremely time-consuming and consequently significantly reduced the time available for my paid work. I wonder whether consultation documents could undergo greater scrutiny by paid staff before releasing them for consultation.

The grammar is rather poor throughout the documents, and they would benefit from professional proof-reading/copy-editing. There are too many instances for me to correct them all, so I have refrained from doing so except where the meaning is unclear. My terms are very reasonable...!

Vivien Pomfrey MSc