

## 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, 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 am now seriously considering leaving Cornwall due to the relentless de-ruralisation which has occurred since I moved here in 1984. Fields have been replaced by houses, and tranquillity has been replaced by traffic noise and the din of construction. 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. It was difficult to ascertain which of the several SEA/SA documents featured on the webpage at

<http://www.ncdc.gov.uk/index.cfm?articleid=3877>

was intended to be read and commented upon; this was not helped by the conflicting wording at the top of the official response forms, which are headed "Strategic Environmental Appraisal/Sustainability Appraisal Consultation" but refer immediately below this to "The Strategic Environmental Assessment/Sustainability Appraisal".

I decided to comment on the SEA/SA of Preferred Options for The Core Strategy in addition to the Draft Core Strategy (see separate submission), and have just commented on the contents of the document in the order in which they occur. This means that some of my comments may be irrelevant to this particular consultation, for which I apologise. It also means that there is some repetition. I hope that it is not too difficult to extract, note and take into consideration what is relevant.

I regret that there has not been time to check this submission fully for errors, omissions or inconsistencies 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.

Where I refer to page numbers, these are the numbers when the documents are viewed on a computer screen in the Adobe Reader program. They are different from those on the actual documents.

## SEA/SA of Preferred Options for the Core Strategy

Page 20 states: “The Issues and Options Report identifies the need to locate health facilities within or on the edge of settlements.” Surely they need to be as central as possible? (To improve accessibility and reduce travel)

Page 21 states: “Future Trends: The Cornwall and North Cornwall Community Strategies seeks to promote education through initiatives aimed at individual learning and education. The Issues and Options Report identifies the need to locate educational facilities within or on the edge of settlements.” Again – need for *central* provision.

Clause 3.25 on page 22 states “...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.

On pp. 23-4: “3.30. The Housing Needs Survey, 2004, estimates that while current annual demand for affordable housing lies at 973 dwellings, the total estimated supply of sites is 344 (including total supply from re-lets (281) and additions to stock(163)) dwellings, leaving a housing shortfall of 629 units per annum<sup>19</sup>. The findings of the assessment indicate that the combination of house price inflation (driven primarily by immigration), and low wage levels has made it extremely difficult for people to purchase a home.”

Taking the population of North Cornwall to be 83,000 (see below) and using the live birth rates and death rates for the year 2000 from

<http://www.cornwall.gov.uk/index.cfm?articleid=10794>

and

<http://www.cornwall.gov.uk/index.cfm?articleid=7691>

there were 739 live births and 1070 deaths in the district in 2000. The birth rate had been falling steadily for many years and the death rates had been fairly stable since 1984. This should be leading to an annual population **decline** of 331.

So why are there deemed to be 973 additional affordable dwellings needed each year?

On page 24 it states: “Added to issues associated with low wage levels is the demand for second home ownership, the housing boom and early retirement to the area from more affluent areas of the UK.”

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%<sup>13</sup>

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.

According to Table 4.1 on 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 x 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. Many 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 x 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.

As well as avoiding the destruction of the natural and built character of the country, using existing stock requires much less energy, much less exploitation of non-

renewable resources and much less monetary cost. It has the added benefit of bringing back to life communities blighted by homes which are empty for all or most of the year, and reviving local shops, post offices, schools, etc.

So where is the sense in allowing further speculative construction which will fuel continued in-migration and second-home purchase just to secure the number of homes which are deemed to be actually **needed** within the district?

Page 24 continues: “3.33. Future Trends: Trends indicate that future growth in housing will continue to rise as a result of population growth; however this may not meet local needs. Issues associated with providing affordable housing for local people and homelessness will be a priority for the LDF.”

How can making the affordable requirement a mere 50% be described as “prioritising”?

As I have calculated above, without in-migration, it would appear that the population would **fall**. If this were allowed to continue, we might eventually return to the population stated by county councillors in 1978 to be optimal (see below).

On page 26 of the SEA/SA it states:

“3.42. The Government’s recently introduced Cleaner, Safer, Greener Communities Programme seeks to invest in improvements in streets and public spaces. This initiative should have a positive effect on improving the quality of parks and open space in the district as well as having a positive impact on the well being of local communities.”

This clearly militates against turning a quiet residential road with public open spaces immediately adjacent to it into a relief road for through-traffic, as is the case with the proposed Kensey Link Road in Launceston and may also hold for other road schemes.

On page 30 it states:

“...data from the Cornwall Biodiversity Initiative: Volume 1 (1997) indicates that wildlife habitats in Cornwall have been lost at a rate of approximately 3% over the last decade (over 1,500 ha) across the county. This includes both the gradual degradation of the quality of wildlife habitats, and the conversion to other land uses such as agriculture, mineral extraction and built development.”

This must be stopped.

On page 32 it states:

“3.57. Future trends: A potential increase in car usage and the road network may lead to deterioration in air quality.”

Thus councils should be putting local, regional, national and international policies into practice, thereby reducing road traffic. They should not be building new roads.

On page 34 it states:

“3.70. Regional Planning Guidance for the South West explicitly refers to the need for local authorities to support national greenhouse gas reduction targets, as well as a regional renewable electricity generation target of 11-15% by 2010.<sup>37</sup> North Cornwall has four wind farms, providing sufficient power (if retained within the district) to supply 40% of the homes.”

This is excellent news, and it should be easy for the district to exceed its target for renewable energy generation. I would like to see it aim to maximise such generation rather than just trying to meet a modest target.

On page 38 of the SEA/SA it states:

“3.85. Self employment and part time employment: Compared to England as a whole, a greater proportion of people are part time or are self employed. 15.3% of individuals are self employed compared to the national average of 8.3%...”

Thus I believe that words such as “employment” and “jobs” should be replaced with “work” or similar so as to be more inclusive.

On page 39 it states:

“There is a need to increase the number of rural workshops throughout the district...”

This has the potential to reduce travel from rural to urban areas.

On page 40 it states:

“...the 2003/2004 Local Plan Monitoring Report which also identifies the need to control the conversion of hotels and guest houses into residential flats or housing (a typical example is Bude), and provide for caravanning and camping facilities and new built holiday accommodation only where there is a proven need.”

There is some lack of clarity in this: does it just mean that caravanning and camping facilities and new built holiday accommodation should only be provided where there is a proven need, or does it also mean that the need to control the conversion of hotels and guest houses into residential flats or housing only applies where there is a proven need?

Have calculations been done to ascertain whether there is a net benefit or disbenefit from the conversion of hotels and guest houses into residential flats or housing?

Issues to be taken into account should include:

- contribution to the district’s economy via taxes;
- relative contributions to the viability of shops, pubs, restaurants, public transport, leisure facilities, etc.;
- reduction in the need to build new properties, thus reduction in costs and environmental damage;

reductions in energy and other resource use through conversion as opposed to new-build;  
effects on social cohesion and consequently well-being.

Worrying error on page 45: “3.123. The North Cornwall District Council’s current strategy seeks to accommodate new development within the District’s six new towns...” I hope that this is not a Freudian slip and that there are no secret plans to build new towns in North Cornwall!

On page 48 it states (re rural areas): “Given the decline in locally based employment (agriculture, traditional tourism and quarrying) commuting patterns to new jobs have altered. As a result of changes in employment many people are experiencing social exclusion.” This perhaps indicates a need for rural work rather than an increase in town-based work which will require increased travel and may damage social cohesion in the rural areas.

It continues: “Employment: Promote development which relates to community needs. Services/facilities: Balance needs to be achieved between sustaining village services and maintaining the character of villages. It is likely that development in main villages will be considered more sustainable locations than smaller or minor villages.”

What does “sustainable locations” mean? 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.

In my view, the factors which should determine work opportunities should be what is available locally, in terms both of natural resources (e.g. woodland and land suitable for growing biofuels) and of the needs and expertise of local inhabitants. I do not agree with the approach of deciding where work should be based and then inviting tenders for “development”. My approach, with appropriate support and safeguards, is more likely to enhance the character and vitality of villages and less likely to damage it. It is analogous to two different approaches which are taken to horticulture: one is to alter the environment to suit the plants which one wishes to grow, whilst a more sustainable, economically and environmentally sound approach is to analyse local conditions and grow plants which are suited to them.

On page 50 of the SEA/SA it states:

“The quality of the natural and built environment is a key asset to the tourism industry in the district as well as the quality of life of residents. Future development must be sensitive to the district’s environmental assets and ensure that the character and quality of the environment is not eroded...”

An example of a greenfield site within Launceston which has been destroyed by housing development is shown in a photograph later in this submission. The fields on both sides of the ancient Cornish hedge depicted have been destroyed, despite substantial, well-founded and determined local opposition. This has caused great distress to residents on both sides of the development, for whom the beautiful semi-wild landscape

was highly valuable. If the Key Sustainability Issue cited above is followed, this kind of devastation will presumably not be repeated.

On the same page it is stated:

“...it is important to encourage and promote alternative more sustainable modes of transport where possible such as community bus schemes and support new infrastructure works for walking and cycling in order to improve links within existing communities.”

I wonder whether there are accepted definitions which differentiate community transport schemes from public transport, and suspect that the two may overlap considerably. Perhaps community transport should be regarded as a type of public transport.

It also states:

“Employment growth and increased quality of employment: Whilst there is a strong intention to support employment growth in Strategic Urban Centres and other major towns, offering the potential for improvements in employment, quality of employment and income. Care needs to be taken to mitigate against effects on the environment and residents’ quality of life, and ensure that rural growth is supported in larger villages.”

The last sentence is unclear. Does it mean that rural growth should only take place where it is supported locally? The wording appears to suggest that people should be **persuaded** to support it!

However, a major question arises from the use of the term “Strategic Urban Centres”.

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.**

I am concerned that throughout this consultation, and perhaps throughout North Cornwall District Council’s policies and decisions, the nature of the district has been misconstrued, and thus various national and regional guidelines have been wrongly applied in determining policy. As I have also noted elsewhere in this submission, this may be why the council has, in my view, designated land for development inappropriately, with the consequence that the character of the district’s small towns has been



damaged through the destruction of green space in and around them, with serious consequent adverse effects on the quality of life of local residents.

An example of a greenfield site within Launceston which has been destroyed by housing development is shown in a photograph later in this submission. The fields on both sides of the ancient Cornish hedge depicted have been destroyed, despite substantial, well-founded and determined local opposition. This has caused great distress to residents on both sides of the development, for whom the beautiful semi-wild landscape was highly valuable.

More poor wording on page 50:

“Climate change: Climate change is likely to be a key issue for the LDF addressing the need to reduce impacts on climate change through a reduced production of greenhouse gases, vehicular movements and more sustainable designs to mitigate the environmental, financial and economic impacts of a potential rise in sea level and change in weather patterns...” This literally means that there needs to be reduced production of more sustainable designs, which I am sure is the opposite of what is meant, and the facts are put together in a generally-muddled order. Suggested wording as follows:

“Climate change is likely to be a key issue for the LDF, which must address the need to reduce the district’s contribution to climate change by reducing its production of greenhouse gases through reduced vehicular movements, an increase in renewable energy generation and the use of more sustainable designs, to mitigate a potential rise in sea level, increased coastal and fluvial flooding, changing weather patterns and other potential adverse environmental, financial and economic impacts.”

More poor wording on page 50 (was someone having a bad day...?):

“...it will be important to explore alternative uses of energy to such as wind, biomass and tidal energy as well as community schemes.” It is not clear what this means. It starts by referring to **uses** of energy and then talks about **sources** of energy. What is meant by community schemes? It would be helpful if the LDF listed the potential types of renewable energy in North Cornwall. Technologies include:

- wave power
- small-scale hydro-electric power
- onshore wind power
- offshore wind power
- photovoltaic solar
- thermal (water-heating) solar
- passive solar
- heat pumps
- geothermal
- biomass (direct combustion)
- biomass (conversion to bioethanol)
- biomass (conversion to biodiesel)
- biomass (anaerobic digestion)
- hydrogen fuel cells

One way in which detrimental effects on the landscape from power generation can be reduced is to generate the power as close as possible to the point of use, thus reducing the need for cables, pylons, etc. and at the same time reducing wastage. Domestic-scale generation is optimal in this respect.

On page 51 it states that

“The draft SEA/SA objectives prepared for discussion were based on the Government’s four themes of sustainable development covering:

- Social progress which meets the needs of everyone
- Effective protection of the environment
- Prudent use of natural resources
- Maintenance of high and stable levels of economic growth and employment”

Economic growth is not a measure of sustainability, but an obsession that the government tags on to otherwise-sound goals. Pursuing high economic growth risks undermining the other goals and making them unattainable.

It continues:

“In addition, consideration was given to more recent Government’s Strategy relating to:

- Living within Environmental Limits
- Ensuring a Strong, Healthy and Just Society
- Achieving a Sustainable Economy
- Promoting Good Governance
- Using Sound Science Responsibly<sup>69</sup>

I agree with these goals. They are not consistent with high economic growth.

On the same page, population is listed as an issue detailed in Annex 1. 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.

A Specific Sub-Objective in Table 4.1 is “To protect, enhance and promote the awareness and understanding of the historic environment”. The entry in the following column is “Number of buildings lost or at risk.” Buildings are not the only features of the historic environment, and others also need to be protected, such as ancient highways, remnants of orchards, etc. This appears to be acknowledged in the last column, but also needs to be explicit in the “How could this be measured” column.

On page 54, the first entry in the last column refers to air pollution being moderate or poor. Pollution cannot be described as poor, so I believe that this should read “air *quality*”.

On page 55, the first specific sub-objective is “To improve health and wellbeing and reduce inequalities.” The entry in the “How could this be measured” column refers to public open space and sports grounds. However, in a largely-rural district like North Cornwall, where towns have areas of farmland and woodland between developed areas, these areas are equally important, being key aspects of the landscape and acting as the “lungs” of the towns. This is especially relevant in light of new legislation which gives greater public access to such land. The destruction of such areas for housing and roads causes great distress to people living adjacent to the land, having a serious negative impact on their well-being.

This is perhaps tacitly acknowledged in the entry “Impact of development on public health and safety” and “Availability, use and access to green space and formal recreational facilities” in the final column, but needs to be more explicit with regard to the type and value of green space.

The unsustainability of many proposals and policies probably arises from their being based on other unsustainable or otherwise-flawed policies, and perhaps misinterpretation of them. For example, the Issues and Options report cites Planning Policy Guidance Note 1 – General Policy and Principles (1997): “Preferring the development of land within urban areas...before considering the development of greenfield sites.”

As I have stated above, 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.”

What Cornish councils are perhaps misunderstanding is that the small towns in North Cornwall, as elsewhere, are not fundamentally urban in character, having greenfield sites on their immediate peripheries and indeed between different areas of the towns. Perhaps this is why greenfield sites of great value to residents of such towns have been inappropriately allocated for housing and indeed destroyed by the construction of housing estates. There are ways in which this might be prevented in future; for example by ensuring that maps show clearly the nature of the localities under scrutiny by planners, and that planners physically visit the localities under consideration. One way to help planners to be aware of the types of environment which they are perusing would be to enter the postcode or location name into the aerial views section of the internet site Multimap, which can be found at <http://www.multimap.com/>

A prime example of the lack of indication of land type was the 1997 exhibition and consultation on the Kensey Link Road in Launceston. Maps on leaflets gave no hint that the road is planned to cut through wildlife-rich countryside, and this is likely to

have influenced public opinion on the desirability of the road, as the area is not well known even to people living in the town.

A photograph later in this submission shows the greenfield site within Launceston through which the road has now started to be built. The fields on both sides of the ancient Cornish hedge depicted have been destroyed for this and for the associated housing estate, despite substantial, well-founded and determined local opposition. This has caused great distress to residents on both sides of the development, for whom the beautiful semi-wild landscape was highly valuable.

In the final column on page 56 it is unclear what is meant by “Percentage of adults participating in basic skills and training”. What is “participating in basic skills”?

I am pleased to see reference to “No of homeless population” on this page, and would like to see figures for this in all documents which refer to housing need, as they should inform decisions on how many homes are deemed to be needed.

I am pleased to see the entry “To safeguard and maximise access to services and community facilities especially in rural areas and for the socially excluded” and am interested to know what councils can do to preserve/reinstate the services referred to in the last column, as they are central to community cohesion and sustainability, including via reducing the need to travel.

I am also pleased to see, on the same page, the entry “To improve opportunities for participation in local action and decision making.” Whilst I welcome consultations such as this, I hope that the views of lay contributors are taken on board and that this is not, like some government “consultations”, simply designed to give the *appearance* that such views are valued and acted upon.

The Headline Objective on page 57-8: “3: To reduce the District’ contribution to the climate” should be changed to “3: To reduce the District’s contribution to climate change”.

I do not fully understand the entry in the final column for this objective of page 57: “Development of renewable energy sources and proportion of energy supplied \*(adapted)” Does this mean the proportion of energy supplied which is from renewable sources? Clearer wording is needed.

The “How could this be measured” column of this section refers to “Energy use by households, commercial buildings and transport.” It needs to also include buildings used by councils, government departments, agencies, health trusts, schools, colleges, day centres, housing associations, charities, etc.

The Headline Objective on page 57: “4: 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 sustainable 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.” The current wording risks encouraging the use of non-renew-

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

I am very pleased to see mention of grey water reuse in this section. However, the references in the last two columns for this section to CH systems, double glazing and insulation do not appear relevant to minimising the consumption of natural resources, although this section could (and in my view should) stipulate the use of wooden double-glazing frames, the re-use of materials and the use of healthier insulation materials such as paper.

If “CH systems” here refers to central heating, I cannot see how this minimises the consumption of non-renewable/natural resources unless the type of central heating is one which does not use fossil fuels. (When I applied for a grant for central heating I was offered oil-fired or nothing, until I protested. A friend accepted the oil option with great reluctance, as NCDC refused to fund central heating run from a Rayburn, which could have used renewable natural resources such as wood, sawdust waste, etc.)

Double glazing and insulation should be in the previous section: “3: To reduce the District’ contribution to the climate” (changed as recommended above).

Another entry which appears irrelevant to the minimisation of the consumption of natural resources is in the last column: “Number of applications permitted affecting environmentally sensitive sites (adapted from Cornwall County Council’s Mineral Local Plan). This is more appropriate to the first Headline Objective: “1: To nurture and enhance the natural, built and historic environment and promote its positive contribution to North Cornwall’s present and future well being”.

On page 58, related to Headline Objective 6: “To develop a vibrant and sustainable economy”, economic growth is referred to as a Specific Sub-Objective. I disagree with the view that economic growth is desirable and would prefer to see a focus on economic **transformation** or **renewal** – from unsustainable to sustainable activities.

I disagree with the suggested indicator for this objective “The percentage of employment land commitments and allocations located within towns and main villages” as I consider that work should evolve according to local need and the nature of the local physical, natural, historical and cultural environment rather than being directed to specific areas. I have also referred to this issue elsewhere. 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 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.

I would support the sub-objective “To promote sustainable, year round and high value added tourism” if I thought that it referred to **genuine** sustainability, but fear that it does not. For tourism to be genuinely sustainable, visitors would have to use transport modes which emitted **no** greenhouse gases, accommodation would have to use only renewable energy, and all materials used to build and repair accommodation would have to be renewable or reclaimed. Until this is possible, tourism is not sustainable, and perhaps an alternative term needs to be used. “Low-impact” is a term which may be suitable.

As tourism is not sustainable, I do not consider that the council should promote it, or fund its promotion. Year-round tourism may be especially unsustainable (if it is achievable) as more heating will be needed during the cooler seasons.

The sub-objective “Encourage the formation and growth of small businesses” is fine apart from the need to add the word “sustainable”, viz. “sustainable small businesses”. I do not want to see the promotion of environmentally-damaging businesses such as those using, trading in or promoting non-renewable resources or unsustainable activities (for example motor racing, dangerous chemicals or air travel).

It would be helpful to define “SIC categories”.

I do not agree with the sub-objective “To increase output and incomes by encouraging the development of higher value added activities”. Increasing incomes is acceptable where they are too low to sustain comfortable (not luxurious) lifestyles, but output must not be increased if it has adverse sustainability implications.

I agree generally with Headline Objective 7 on page 59 but wonder how “sustainable tourism” is to be defined and monitored. (See my earlier comments on this.)

Re Headline Objective 8, the sub-objective “To reduce accidents and car use” on page 59 should perhaps leave out “and car use”, as the previous sub-objective is to reduce the need for vehicular trips, and because accidents and car use are different in emphasis. Alternatively, reducing car use could be added to the third sub-objective which relates to increasing transport modes other than private cars. “Modal switch” is perhaps a suitable general heading for this sub-objective.

Clause 5.6 on page 62 of SEA/SA reads: “The RSS is proposing to build on the spatial strategy contained in Regional Planning Guidance 10 (RPG10) for the South West, by remaining ‘urban focussed’, i.e. delivering the major part of additional future development requirements in the Principal Urban Areas (PUAs), with the towns identified as ‘Other Designated Centres for Growth’ also making a significant contribution.”

As I have stated above, 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, Fal-

mouth-Penryn, Newquay, Penzance, St Austell and Truro) according to their role and function, and on Saltash and Torpoint in South East Cornwall.”

I reiterate my views on this: In a largely-rural district like North Cornwall, where towns have areas of farmland and woodland between developed areas, these areas are equally important, being key aspects of the landscape and acting as the “lungs” of the towns. This is especially relevant in light of new legislation which gives greater public access to such land. The destruction of such areas for housing and roads causes great distress to people living adjacent to the land, having a serious negative impact on their well-being.

In my view, the factors which should determine work opportunities should be what is available locally, in terms of natural resources (e.g. woodland and land suitable for growing biofuels), the physical, natural, historic and cultural environment and the needs and expertise of local inhabitants. I do not agree with the approach of deciding where work should be based and then inviting tenders for “development”. My approach, with appropriate support and safeguards, is more likely to enhance the character and vitality of villages and less likely to damage it. It is analogous to two different approaches which are taken to horticulture: one is to alter the environment to suit the plants which one wishes to grow, whilst a more sustainable, economically and environmentally sound approach is to analyse local conditions and grow plants which are suited to them.

I note that Clause 5.7 on pp. 62-3 expresses concerns similar to mine: “Two of the possible development strategies being proposed for the RSS (to continue with RPG10, concentrating development in PUAs, or to strengthen RPG10) could increase remoteness and loss of services in rural areas.” They could also increase the need to travel, which would be at odds with policies attempting to reduce this. These approaches are also likely to exacerbate the existing problem of young people having to move out of the countryside in order to access work, leading to an increased demographic imbalance and increasing the existing problems of local schools having to close due to too few children living in the rural areas. Such approaches appear inconsistent with the laudable emphasis on dynamic communities in district policy.

For these reasons I prefer the “Differential Approach” referred to on page 63, but with stringent safeguards to prevent the urbanisation referred to. I do not believe that such urbanisation would occur if development were led by local need instead of being driven by property developers whose driving force is to maximise profit and therefore build properties only affordable by relatively-wealthy incomers.

5.12. on page 63 states: “Policy SS19 of RPG10 recognises market towns as the focal points for development and service provision in the rural areas, and recommends support for this role. Development outside market towns should be small scale, taking place within or adjacent to existing settlement, and that scattered forms of development should be avoided.

I have had a quick look at RPG 10 and could not find a rationale for these views, so wonder whether there is a rational basis for them. Has development not historically been of a scattered nature in the countryside, arising from individual farms? Is there something inherently wrong with this? Indeed, a more scattered development pattern

might put less pressure on natural resources and habitats and also reduce isolation and fear of crime. The key is to make **all** development environmentally sensitive and sustainable.

(I personally believe that **all** development should be small-scale unless there are extremely strong arguments for large-scale development.)

Clause 5.14 on page 64 states that ‘the SA of RPG10 notes the relative paucity of available previously developed land in the South West, and shows “that policies which involve loss of undeveloped land are delivering important aspects of the sustainable development agenda which have strong social and economic benefits. Without this use of undeveloped land these benefits could not be gained.”’ I question whether this is in fact the case.

I fear that the word “sustainable” has become a meaningless buzzword which is attached, sometimes apparently at random, to statements about unsustainable practices. As I have explained above, bringing all empty homes and 54% of second homes into full use would provide all the remaining claimed requirement for homes, which I actually consider to be excessive in any case, and it would also be much more effective at creating community sustainability and cohesion than building new homes.

This view appears to be echoed by the statement in Clause 5.15:

“· The Structure Plan seeks to...maximise the contribution of previously developed land and buildings to encourage regeneration and the full use of existing infrastructure.”

which appears to be at odds with the statement in clause 5.14 if one interprets “previously developed land and buildings” as including empty and second homes. I fear that councils are **not** in fact maximising the contribution of these and are instead going down the usual path of newbuild. I urge NCDC to look at this issue seriously and thoroughly. It is *so* important, and absolutely vital if the council genuinely wants sustainable development and thriving communities.

Clause 5.16. states: “The Spatial Strategy (Policy 16) acknowledges that Cornwall has a dispersed settlement pattern...” To my mind, “dispersed” is synonymous with “scattered”, and this adds to my inclination to challenge the statement in RPG 10 that “scattered forms of development should be avoided” (see above).

Clause 5.18 on page 65 again refers to directing development to some specific places rather than in accordance with local resources, character, need, etc., with response to local need only deemed appropriate to smaller settlements, whereas I consider that these criteria should apply everywhere. See my comments above.

Clause 5.19: I do not agree that “policies involving the loss of undeveloped land will deliver strong social and economic benefits” for reasons given above. I therefore **profoundly** disagree that “the positive social and economic benefits of providing affordable housing in rural areas of the District” should be given priority over negative effects on the environment, which I assume means that **putative** social



and economic benefits should be allowed to override concerns over **certain** environmental damage.

I am also puzzled by the reference only to *rural* areas in this clause, which consequently gives the impression of ignoring the existence of undeveloped land within and on the periphery of towns, whose value I have referred to above.

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**.

The Strategy: Clauses 5.27-5.36 on pp. 67-69 again assume that the council must **direct** development to specific areas, with which I disagree as detailed above.

Clause 5.29 refers to Option 1, which is “To continue to implement the strategy in the current Local Plan which is based on a settlement hierarchy and seeks to spread development within the principal towns (6), the main villages (32) and minor villages (62).” It states: “All settlements identified through the settlement hierarchy could realise benefits through increased investment providing opportunities for regeneration, improved services and employment opportunities and potentially reduce inequalities in health and poverty.” I agree with this statement. However, I am less convinced by the other statements in Clause 5.29. I am not aware of any firm evidence that “this option could encourage the widespread incorporation of energy efficiency in design/construction and the use of renewable energy sources at a community level” more than the other options. Is there any such evidence or a rational basis for the claims?

Another statement in Clause 5.29 which does not convince me is “It could generate widespread improvements in the environmental and social performance of the economy through the promotion of sustainable tourism.” How could it do this?

It is possible that this option could, as claimed, generate improvements in the environmental and social performance of the economy through the promotion of sustainable land management practices, for example by permitting the construction of low-impact homes on smallholdings or in woodlands from which the occupants, and perhaps a small additional workforce, could run sustainable businesses such as organic horticulture, camping, the growing of biofuels, herbs, fruit and nuts and the use of woodland materials for charcoal-making and crafts.

This option may also, as claimed “increase the demand for further investment in alternative modes of transport”; if so, it is vital that any necessary funding for such transport modes is planned for and made available as soon as possible – before residents get too enmeshed in the habit of using private vehicles to travel everywhere. If recommendations later in the document to install public transport infrastructure prior to construction are followed, such problems should not arise.

I do not understand the meaning of “Potential negative effects are associated with the loss of further Greenfield land, as all settlements listed are required to meet a proportion of development and the underutilisation of employment land and skills base within larger settlements” in Clause 5.30. The last section does not appear to make sense, as it means that all settlements are required to meet underutilisation. To which other part of the sentence does it relate? Negative effects? If so, there needs to be a comma after “development” and the word “with” inserted after the comma.

I do not agree with the maxim that “all settlements listed are required to meet a proportion of development” for reasons given above. If there is no local demand or need, there should be no development.

Clause 5.31 states re Option 2 (To focus future development on the four largest towns): “It should generate and encourage the retention of a wider skills base, support the use of renewable energy, energy efficiency in design and construction and reduce natural resource consumption.” Does this mean that these outcomes are anticipated or simply desirable? Is there evidence that this option would produce these outcomes?

I would also reiterate my strong recommendation that the phrase “natural resource(s)” should not be used in such contexts, as natural resource consumption is not a negative activity – it is essential for life. It is **non-renewable/unsustainable** consumption which must be avoided.

Clause 5.33. states with regard to Option 3: “Concentrating development within the principal towns will have numerous social and economic benefits for such locations, resulting in greater investment in employment opportunities and diversity, improvements in community infrastructure and facilities as well as environmental improvements to the townscape character.” Again, is there evidence for all these claims? The outcomes will surely be highly dependant on the **type** of development. I would challenge in particular the claim that the option would result in environmental improvements to the townscape character. In my view, and that of many others, development has had exactly the opposite effect in Launceston; it has seriously marred the landscape as seen from all directions, and increased noise and pollution.

Clause 5.34 states, re Option 3, “High levels of commuting will still result from more rural locations unless alternative life-work patterns develop associated with flexible working, home working and improved telecommunications.” I agree with this, and it is, in my view, a good argument for allowing development **everywhere** to evolve according to local need, as this is more likely to result in a good balance of housing, work, facilities and sustainable transport systems. The council’s role should simply be to *facilitate* such development: by surveying communities to ascertain their needs, exercising a degree of control to prevent inappropriate development, and providing advice and funding where necessary and possible.

I agree strongly with Clause 5.35: “Within the main settlements an increased concentration of population and employment could result in higher levels of air, water and noise pollution, greater pressure placed on adjacent Greenfield land and consequently the erosion or loss of important sites of nature conservation, landscape

or heritage interest. A rise in population numbers within main settlements could place a strain on the existing infrastructure, including water and energy supplies.”

This is not hypothetical – it is already happening.

On page 69, Clause 5.40 illustrates issues which should be decided by local communities rather than councils:

- How will the LDF take into account changes in the settlement structure over the plan period? If a minor village loses its community facilities (shop or town hall) will the settlement be excluded from consideration for development?
- How will people migrating into the area impact on settlement demographics?
- Will some settlements be considered more favourably than others resulting in an ageing population in some locations?”

To avoid such problems arising, I would suggest:

If a village appears to be under threat of losing such facilities, the council should, in the absence of such action at the level of the community, organise a survey to ascertain whether villagers wish to retain the facility. If they do, the council should help them to do so. It would be financially prudent to include, in such a survey, questions as to what other facilities are desired, in order to minimise the number of surveys required and thus keep costs down.

In-migration can and should be minimised, by ensuring that development only occurs in response to local need. There may also need to be measures taken to ensure that people living in the area, or with origins in the area, are given priority for purchasing or renting any property in the vicinity.

The unsustainability of many proposals and policies probably arises from their being based on other unsustainable or otherwise-flawed policies, and perhaps misinterpretation of them. For example, the Issues and Options report cites Planning Policy Guidance Note 1 – General Policy and Principles (1997): “Preferring the development of land within urban areas...before considering the development of greenfield sites.”

As I have stated above, 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.”

What Cornish councils are perhaps misunderstanding is that many small towns in Cornwall, as elsewhere, are not fundamentally urban in character, having greenfield sites on their immediate peripheries and indeed between different areas of the towns. Perhaps this is why greenfield sites of great value to residents of such towns have

been inappropriately allocated for housing and indeed destroyed by the construction of housing estates. There are ways in which this might be prevented in future; for example by ensuring that maps show clearly the nature of the localities under scrutiny by planners, and that planners physically visit the localities under consideration. One way to help planners to be aware of the types of environment which they are perusing would be to enter the postcode or location name into the aerial views section of the internet site Multimap, which can be found at <http://www.multimap.com/>

A photograph later in this submission shows such a greenfield site within Launceston. The fields on both sides of the ancient Cornish hedge depicted have now been destroyed for a housing estate and part of the proposed Kensey Link Road, despite substantial, well-founded and determined local opposition. This has caused great distress to residents on both sides of the development, for whom the beautiful semi-wild landscape was highly valuable.

Clause 5.42: I am pleased to see that the SEA/SA is querying the proportion of new housing to be built on brownfield land, and pointing out that the 40% figure in the LDF is lower than that identified in regional targets of 50% (based on RPG 10), but would go further in challenging this, based on my calculations above indicating that **no new housing is needed at all**.

Regarding the valid query in this Clause: “At what level are smaller settlement(s) sustainable and what proportion of growth per settlement should be encouraged?” I would reiterate my view that growth should be determined by local need, and certainly **never** encouraged by external parties. The role of the council should be merely to collate information and provide guidance, support and a degree of control (for example to prevent environmental damage). Issues of local sustainability are much too complex and “organic” to be suitable for analysis and direction by external bodies such as councils. Sustainability is something that is more likely to arise naturally than by being imposed. Imposition of development targets from “above” is one of the root causes of the unsustainable nature of human lifestyles.

Clause 5.43 illustrates the illogicality of government policy:

“Government guidance seeks to centre future housing on urban centres and larger towns where there is access to local employment opportunities, services and facilities, shops and public transport.”

Let us analyse this, and I apologise in advance if I appear a little facetious, but the situation really is farcical.

Government wants to make sure that housing is provided where there is access to local employment opportunities, services and facilities, shops and public transport.

But the same government also wants to make sure that there are local employment opportunities, services and facilities, shops and public transport, for which it is also responsible to varying degrees, and bases perceived requirements for these on population levels, which are determined by housing.

So there are armies of people supposedly determining appropriate levels of housing where there are adequate facilities, and other armies determining the need for facilities according to the levels of housing. Whilst employment of these armies of people undoubtedly helps to keep unemployment levels down, the results are, unsurprisingly, not good. There are too many inappropriate houses being built in inappropriate areas, and still grossly-inadequate levels of affordable housing and public transport provision. Later on in this submission I note that there are plans to provide thousands more jobs in Cornwall than Cornwall's unemployment levels merit. If this happens, yet more housing will have to be provided for in-migrants drafted in to fill the jobs! It will be a vicious cycle of unsustainable growth.

Councils' roles should be to consult people **in detail** on what they need in their locality, and help to facilitate the meeting of these needs. This change of tack might even improve local democracy by enhancing the role of town and parish councils, and improve community cohesion – another of the stated aims of the LDF.

Going back to the clause: “Government guidance seeks to centre future housing on urban centres and larger towns...”

As I have stated above, 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.**

Clause 5.43 (page 70 on screen) also states: “It should be noted that some brownfield sites may have become important habitats for particular species.” This further supports the urgent case for bringing empty and underused homes into full use and to avoid newbuild.

It also states: “could the provision of some level of development in smaller settlements (without a community hall/shop) achieve a more sustainable community?”

This is again an argument for asking the local people what **they** want and need, including community halls/workshops.

Re Clause 5.44, I am not sure what relevance energy consumption, the use of recycled materials/secondary aggregates and reducing water consumption and waste generation have to do with housing density.

Clause 5.45 asks: “Should a minimum affordable housing target be defined in the LDF with variations depending on the location?”

As long as we are stuck with a system whereby councils decide where and what to build, my answer is “yes”. Unless there is a clear, explicitly-defined and justified local requirement for non-”affordable” housing (a phrase which illustrates the bizarreness of the term “affordable”), the target should be 100%.

I am very concerned about the second point in this clause (page 71) : “Will all development with an element of affordable housing lie in close proximity to the public transport network?”

This appears to me to illustrate a class-based attitude to public transport, which is divisive and unjustified. It appears to assume that only poor people would willingly use public transport – an attitude that will further influence people to want to use private vehicles to show that they are not part of an underclass! **All** development should be accessible by public transport, walking and cycling.

Also on page 71, the last point in Clause 5.45 asks: “· If high quality design is achieved, as planned, could people in need of affordable housing be priced out of the housing market?”

Firstly, people in need of affordable housing are *already* priced out of the housing market. Secondly, I do not believe that high quality needs to equate to high price. Indeed, properties built or adapted to high environmental standards will cost less to run in terms of energy and water use, so will make it easier for poorer residents to afford a decent quality of life.

Clause 5.46 asks: “· Will the make up/demographics of communities be altered through the new proposals?”

As long as housing is supplied by speculative development companies, this will be the case, and in an adverse way, as older, wealthier people will move into the area and younger locals will be forced out.

The Clause also asks “· Will there be mixed use development to encourage more sustainable patterns of growth?” I favour such development (but not the drive for growth) except in the case of industries inimical to proximity to residential areas due to noise, pollution, hazard, etc., or industries which generate a large amount of heavy-vehicle traffic.

The Draft Core Strategy for the LDF appears to regard loss of retail space (which might perhaps occur if mixed use were encouraged) as undesirable, and I have commented on this possible anomaly in the part of my submission relating to that document.

The question in Clause 5.46 “· Will consideration be given when siting development to the viability and vitality of adjacent landuses, local communities’ quality of life and the local environment?” is relevant to my comments above about the distress caused to residents when adjacent greenfield sites are built on.

A photograph later in this submission shows such a greenfield site within Launceston. The fields on both sides of the ancient Cornish hedge depicted have now been des-

troyed for a housing estate and part of the proposed Kensey Link Road, despite substantial, well-founded and determined local opposition. This has caused great distress to residents on both sides of the development, for whom the beautiful semi-wild landscape was highly valuable.

Clause 5.46 (page 71) also asks “What measures will be taken to prevent incremental development beyond the agreed limits of new settlement boundaries and encourage the utilisation of existing buildings?” I have addressed these points above, including calculations showing how housing needs can be met without any newbuild. I do not agree with settlement boundaries *per se*. All applications should be dealt with on their individual merit and with maximal regard to the needs and wishes of local people.

I strongly support the point in Clause 5.49 (re employment land) that “Opportunities to reuse/convert existing buildings should be considered.”

I also strongly support the points: “In the design and construction of development, consideration should be given to reflecting/retaining locally distinctive features, minimising water and energy consumption and waste generation. Such proposals should also seek to incorporate renewable energy sources. In addition, proposals should seek to source and/or reuse recycled materials where possible.”

I would go further with regard to the above points, and would urge that such criteria should be mandatory requirements upon which the approval of development proposals is conditional, and that failure to meet such requirements following the granting of permissions should result in their being rescinded.

I agree with the point in Clause 5.49 that “Major employment proposals should include green travel plans in order to encourage employees to use alternative modes of transport” but would urge that such requirements be extended to medium-sized proposals. Sites consisting of a number of small work units (e.g. industrial estates) should have co-operative green travel plans linking all the units.

I agree with Clause 5.50 on page 72. The points about reducing vehicular trips and encouraging the growth and formation of local businesses are consistent with my favoured policies of facilitating locally-driven development rather than development being directed by the council.

The use of the word “sustainability” in Clause 5.51 illustrates the lack of clarity and consistency in defining the word. Here it presumably relates to *economic* sustainability, as any net growth in tourism will almost certainly be environmentally damaging.

The meaning of Proposal LE5: “Consideration should be given to the provision of high quality tourism accommodation” is unclear. How is “quality” being defined? For example, the more luxurious types of accommodation tend to be the most environmentally damaging in terms of resource use, and those which isolate people from the natural world to the greatest extent are likely to be more detrimental to health.

I agree with Proposal LE6: “Permissions need to be carefully monitored to ensure that the conversion of existing hotels to accommodation addresses local need.” However, I question why such an absolute position is taken with regard to the potential loss of tourism, but is **not** apparently taken with regard to natural environment loss or with regard to the needs of residents not to have their localities blighted by speculative development instead of bringing empty and underused properties into full use. In the latter contexts there are merely requirements to ensure that half of new properties are affordable (so the other half is not) and for 40% of newbuild to be on previously developed land (so that 60% must be on greenfield sites).

**This discrepancy suggests that tourism is regarded as more important than the environment and the overall needs of residents.**

I agree wholeheartedly with the implication of the question in Clause 5.52: “What opportunities are there to retain and train people in traditional rural skills such as stone wall building, hedgebanks/hedgerows which will support distinctive landscape types?”

This is exactly the kind of skill which will help to retain North Cornwall’s historic and cultural distinctiveness and enhance the natural environment, although I would urge maximal reuse of stone to minimise the need for quarrying. Crafts based on renewable materials should be given a high priority.

I also support the suggestion in the clause that activity and experience holidays, and environmental tourism should be promoted. North Cornwall is rich in the resources needed for healthy, sustainable activities as diverse as pony trekking and surfing, and should capitalise on such potential. I would add the need to encourage and enable visitors to travel to and within the district by environmentally-friendly transport modes.

I also agree with the statement at the end of Clause 5.52 that “Care needs to be taken when monitoring tourism related development to ensure that capacity levels within particular locations are not exceeded” and wonder how this is determined and by whom. Residents should have a major input into such determinations, as they will be most affected by them.

I agree with the point in Clause 5.55 that “When determining the siting of retail stores, and in particular major food stores, it is important to ensure that they are in close proximity to a well integrated public transport service.” In Launceston at least, there is a very long way to go before its public transport provision could be said to be well-integrated. Although I live within Launceston’s development boundaries (with the consequent loss of greenfield land to development) I am only able to access shops in the town centre and in Newport Industrial Estate, due to the extreme paucity of public transport.

I strongly support Clause 5.56 on the need to halt/reverse the decline in the number of village shops. I would like to see *all* applications for the retention or establishment of village retail facilities regarded positively unless there are strong contraindications (e.g. objections from residents).



Clause 5.57 proposes to “Maintain an adequate supply of open space, sport and recreation facilities”. However, the subsequent sentence “Uncertainties are associated with further provision and the potential erosion of landscape character, heritage and nature conservation sites” suggests that the areas to be maintained exclude natural/semi-natural habitats as settings for recreational activity (e.g. walking, cycling and horseriding). Are such environments included in the definition “open space” or is this term more descriptive of the parks found in large towns where they are often the *only* open spaces accessible by many people? Wild/semi-wild environments are the reason why many people choose to live in the district and are extremely valuable for healthy recreation.

I am uneasy about Clause 5.59: “Securing community benefits through development” which I believe refers to the practice known as “planning gain”: the requirement on developers to make provisions to benefit the community. I believe that this practice offers too many opportunities for corruption and poor planning decisions. The developers have too much power in the partnership and can effectively hold planners to ransom if the planners are struggling to meet development targets imposed from above. It risks over-dependence on commercial interests and is perhaps somewhat analogous to relying on the Lottery to fund the NHS. This is one reason why I do not favour speculative development but instead advocate that development should be driven by local need.

I note that Clause 5.62 refers to “objectives to reduce North Cornwall’s contribution to climate change” and would like to emphasise the need to pursue such objectives in all policies. Reducing North Cornwall’s contribution to climate change requires changes to the wording of some policies which only aim to *slow the rate of increase* in, for example, road traffic. Reducing means **stopping** and **reversing** such increases. This may be impossible if population is encouraged to increase through speculative construction.

I support Clause 5.62 Proposal RE2 but am not sure what is meant by the second sentence: “Opportunities to recover energy through reuse/restoration work should also be explored” Does reuse refer to materials and/or buildings? Presumably restoration work is a reference to renovating buildings. I am not clear, however, where energy recovery fits in unless it refers to producing energy from burning waste wood, which I support as long as the wood is of insufficiently high quality to (re)use in construction. Renovation as opposed to newbuild certainly saves a lot of energy, as does the reuse of materials.

The questions in Clause 5.63 (page 75) are pertinent and I echo them. I would add a question as to whether the council could support domestic-scale renewable generation with grant aid as it does for central heating and energy efficiency, and would strongly urge that it do this.

Clause 5.66 (page 75): Proposal ENV1: “Should locally important landscape features such as hedgerows/hedgebanks and distinctive blocks of trees/woodland which inform local distinctiveness and landscape quality also be protected?” I believe strongly that they should, and that local residents should be consulted as to the importance of such features to them.

I strongly support this statement re Proposal ENV1: “Although reference is made under “natural environment” to nature conservation and landscape, consideration should also be given to air, soil and water quality and visual impacts” except possibly in respect of “visual impacts” as perhaps these are covered by “landscape”.

Re Proposal ENV2 (pp. 75-6), the SEA/SA states: “Clarification is required on how planners and developers “will deal more effectively with biodiversity issues” as referred to in the LDF. Although the proposal advocates a partnership approach to the development of supplementary planning guidance on nature conservation, is this achievable and how will localised issues be taken on board?”

My own experience may help to illuminate this issue. I spent a considerable amount of time collecting amateur nature data on my locality, and submitted them to the Cornwall Wildlife Trust to assist them in carrying out a more professional assessment of the area, particularly in relation to proposals for housing estates and the Kensey Link Road. Notwithstanding my caveats as to the incompleteness and amateur nature of my records, I was astonished to find that the Trust had used them to assert, in relation to an application for a housing estate, that

“The proposal does not fall within any designated site, neither does the area of development appear to hold any species of particular nature conservation importance...”

thus giving the green light to the development, despite **not having visited the site**.

Ecological assessments carried out by Cornwall Environmental Consultants have contained numerous errors, omissions and ambiguities, and the consultants have not visited me to seek information or guidance, even when they have sought to survey land which I am managing and when I have instructed councils to ensure that I am consulted. The assessments have only taken place on a few days each year so have not been able to identify species which are only visible/identifiable at other times of year.

I therefore propose that the council seek to produce a database of local amateur naturalists who can provide year-round data which can then be checked by experts. All those involved should receive some form of remuneration, as the work can be time-consuming and can consequently reduce people’s ability to carry out paid work (such as in my case).

The statement under “Proposal ENV7” in Clause 5.66: “Encourage the reuse of construction and demolition of waste in new development” does not make sense. Should it read: “Encourage the reuse of construction and demolition waste in new development” or perhaps “Encourage the reuse of demolition waste in construction and in new development”? My own preferred wording would be: “Encourage the reuse of waste in construction and renovation”. It appears to be standard practice in renovation (from personal experience) that builders throw away perfectly good materials and fittings and replace them with new ones. This not only leads to unnecessarily high costs to householders and, when grant-funded, to councils (and therefore council taxpayers), but this consequent excessive cost can leave insufficient

funds for all the required works to be carried out, potentially making it impossible to install the most environmentally-friendly, energy-efficient technology and measures, quite apart from the sheer waste. There appear to be regulations in place that prevent the use of second-hand materials and fittings, as I discovered when having work carried out by Anchor, which also prohibited plumbing measures which facilitated the reuse of grey water. Such regulations need urgent overhaul, and perhaps NCDC should disregard regulations and guidelines which are inimical to sustainability. It will in many, if not all, cases be possible to defend such disregard by reference to other guidelines which conflict with the unsustainable ones.

I agree with all the points listed under Proposal ENV7 in Clause 5.66 (page 76) possibly apart from the last one: “Minimise car parking provision”. Whilst this practice as applied to workplaces may encourage people to use alternative transport modes to private vehicles, I am not convinced that the same applies to the residential context. Has research been conducted on this? Is it not possible that a lack of convenient parking space at home may lead to people *using* their cars more, especially if it means the difference between leaving a car somewhere where it is vulnerable to theft or vandalism and driving it? I do support measures to prevent *excessive* numbers of parking spaces being allocated to homes, although this may sometimes conflict with the need to increase the occupancy rates of homes. Cases may need to be decided on individual merit, and the policy should remain under review. Accessibility for the disabled also needs to be taken into account; I have recently heard from disabled people elsewhere in the country who have received parking tickets when having to park temporarily in residential spaces while visiting relatives.

There appears to be a serious error in Clause 5.68 where it refers to “**maximising** car parking provision” (my emphasis).

Clause 5.69 cites the current Local Transport Plan as stating that “the car will remain a necessary part of life for so many people” due to the rural nature of the County’. This is not necessarily a cause for great concern. Some European countries have higher levels of car *ownership* than Britain but lower car *usage*. (I am not sure about the correspondence between this and population density internationally). It is car *usage* which causes congestion and most car-related greenhouse gas emissions. This point is relevant to my criticism above of the class-focused part of Clause 5.45 on page 71 : “Will all development with an element of affordable housing lie in close proximity to the public transport network?” I do not know whether the perceived association between public transport and low class/low income is a peculiarly-British idiosyncrasy, but urge the council and its advisors to try to avoid it, as it is an attitude which will discourage the use of public transport by those who can afford not to use it.

Oh dear. The association is repeated in Clause 5.70:-

- Proposal TRA2: Although the proposal states that new development should be linked to transport, it is critical when this proposal is developed further that areas allocated to affordable housing have easy, short links to public transport routes.

So the previous occurrence was not a simple slip, but appears to be a manifestation of snobbery with regard to public transport. Whilst such attitudes are widespread, it is worrying to see them echoed in a document produced by people who are supposedly authorities on sustainability, and suggests that perhaps the authors themselves rarely or never use public transport!

This suggests a possibly useful area of research: what would make **the authors** of the SEA/SA switch from private vehicle use to more sustainable modes?! (Serious and constructive question)

ALL development should, where possible, have “easy, short links to public transport routes”.

Proposal TRA2 states: “In developing this proposal, consideration should be given to the proximity of proposed transport routes, to adjacent land uses and the potential impacts on the local community’s quality of life associated with air and noise pollution during and after construction.”

Why should “the potential impacts on the local community’s quality of life associated with air and noise pollution during and after construction” be more relevant to affordable housing than to other kinds of development?

I am writing as someone whose life has been blighted for the past three years by noise from construction of a housing estate on greenfield land near my house, having moved to this house in 1996 largely because it was quiet and surrounded by fields. To my knowledge, few of the new houses are to be “affordable”. This greenfield site is shown in a photograph later in this submission. The fields on both sides of the ancient Cornish hedge depicted have now been destroyed for a housing estate and part of the proposed Kensey Link Road, despite substantial, well-founded and determined local opposition. This has caused great distress to residents on both sides of the development, for whom the beautiful semi-wild landscape was highly valuable.

Comments in Clause re Proposal TRA5: “Opportunities should be explored to minimise car parking spaces for both residential and employment land, and consider dual use as referred to in PPG 13.”

Dual use: yes.

Minimising car parking for residential land: see my reservations above.

Re Proposal(s) TRA6: “Whilst this proposal takes a positive stance responding to development proposals likely to have a significant traffic impact, should the policies seek to be more proactive and encourage all developers over a specific size to submit green travel plans?” I would say yes, and make sure that the size chosen is not too high. Traffic is cumulative, and many small initiatives can add up to a significant improvement.

I fully support Clause 5.71 apart from the rather defeatist statement: “Although it may have to be accepted that reducing vehicular trips will be difficult to achieve...”. I do not believe that sufficient and appropriate efforts are being made towards reducing traffic, that a business-as-usual attitude prevails and is exacerbating the problem, and

that it is achievable if the will is there. I recommend that the council and its advisors explore systems in other countries to see what we can learn from them. It is also crucial to avoid perpetuating the view that public transport is only for the poor and lower classes!

In answer to the question: in Clause 5.72: “Will the existing transport network have the capacity to address a likely increase in population (as well as seasonal fluctuations)?”

No. So:

There should be **no** increase in population. As I have stated above, 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. So Cornwall already has more than a 34% excess over the optimum population.

There needs to be a substantial increase in public transport provision.

Clause 5.72 also asks: "Should the District be pushing to explore more innovative solutions working with Cornwall County Council and the East Cornwall Rural Transport Partnership?" Yes, I believe that it should, and they do not have to be particularly innovative. I would also like to emphasise the need to *publicise* the existence of public transport. It is not enough to make bus timetables available in newsagents and council offices. If people do not know of their existence, they will not seek them out. I am copying below an extract from my document “The case against the Kensey Link Road” which I provided to Cornwall County Council and which can be downloaded from [http://www.vivienpomfrey.co.uk/kensey\\_valley2.htm](http://www.vivienpomfrey.co.uk/kensey_valley2.htm) at the link [Kensey Link Road critique](#)

“There are scarcely any bus stops for the routes to and from Launceston, giving the impression that there are no bus services. For example, I lived in Polyphant for several years before I realised that buses passed through it, even though there are two noticeboards at the main (unmarked) bus stopping point where timetables could be placed. Even after having learned of the existence of the bus route, I still did not know the *times* of the service or where I could find these out. I recently became tired of pointing out these omissions to a bus driver who continually complained about the lack of passengers boarding or alighting at Polyphant. His proposed solution was to stop taking the bus through the village rather than letting the villagers know about the service!

A simple, modest investment in bus stops and *in situ* timetables could significantly increase passenger numbers.

I find this lack of visible bus stops and on-site timetables extraordinary; it appears that people (including visitors) are expected to either know about bus services by word of mouth, to know that (and where) they can obtain timetable booklets, or to have supernatural powers.

Another useful spur to using buses would be local bus maps, both in portable form and at stops, showing routes in greater detail than the main Cornwall Public Transport map.

Now resident in Launceston itself, I do not know whether there are any bus stops within reasonable walking distance of my home (say half a mile level walk) or how to find out.

**The “Investment” section of the (previous) LTP refers to the need to identify bus stops in Launceston.** This is surely a cheap, relatively simple measure to implement.”

I would also recommend that all households receive leaflets giving details of public transport both in their area and further afield.

I do not know what “back loading of vehicles” means. Does this mean ensuring that vehicles carry loads on their return journeys? This is a good idea.

On the subject of freight, a substantial reduction in traffic can be achieved by sourcing goods locally. I believe that this is already County Council policy, and there should be incentives to increase it across the district. It is also highly beneficial to the local economy and may have knock-on effects such as increasing work opportunities and thereby enabling young people to remain in the district.

Re specific points on Bodmin, Camelford and Launceston (pp. 78-80): is it assumed that there will be population growth? If so, why?

I am pleased to see references on pp. 78-80 to the need to improve public transport and reduce car use in Bodmin, Camelford, Launceston and Wadebridge and the query as to whether a Camelford bypass would merely increase vehicular trips.

I am also pleased to note the concern over Padstow reaching saturation point with regard to tourism.

I am pleased to note reference to teleworking in Clause 5.81, which looks at the rural area.

The question on page 81: “Will some settlements result in the loss of population to new developments within towns and major villages, and if this does occur what are the likely consequences on the community(?)” illustrates the folly of dictating development rather than responding to local need.

The question “to what scale should settlements be allowed to grow before new development undermines their existing character?” is also a matter which should be determined in the localities concerned, with advice, arbitration and control from councils where required.

The answer to the question “At what scale will affordable housing occur...?” is “at the scale dictated by local need”.

Re Table 5.1 starting on page 82, Headline Objective 1: I do not agree with the policy of requiring any settlements to meet development needs. **Whose** needs are these claimed to be? There should be little or no “development pressure”.

I am bewildered by the entry under “Weaknesses” for Option 3: “Lack of investment in main and minor villages will restrict opportunities for regeneration and enhancement of the built environment if this is sensitively handled, and enhance local distinctiveness” and suspect that the last part is included in error, referring as it does to advantages, not disadvantages.

On page 83 under “Strengths” related to Option 2 for Headline Objective 2 it is stated: “The proposal would force the need to explore improvements in flexible working and telecommunications in minor villages”. Surely it is Option 1 which would force such action to a greater extent?

Similarly, for Option 3 it is stated: “The proposal would force the need to explore improvements in flexible working and telecommunications”. Why would this be the case for this option?

Perhaps this illustrates the need to separate housing and employment in the Table. If housing, but not employment provision, is developed, the need to travel is likely to be increased unless mitigating action (e.g. teleworking) is taken. If employment is provided without a similar level of housing provision, the same will occur.

It also illustrates the desirability of development being locally-driven rather than imposed.

Similarly, a “weakness” for Option 1 is given as “Villages without a community facility will continue to experience a loss, generating a sense of isolation”. Surely the opposite would be the case, as this is the option that *includes* minor villages in the development framework?

Re Headline Objective 3, “Strengths”, the disparities between the three options with regard to opportunities for energy efficiency/conservation/renewables need not be great if small-scale (including domestic-scale) renewable generation is brought into being. This has the advantages of wasting less energy through transmission and requiring less cabling, as consumption is closer to the site of generation.

“Weaknesses”: there should be mention of other ways of reducing vehicle movements here, such as teleworking. Also, again, if employment provision is developed alongside housing provision, there is no reason why commuting should increase.

As I have stated above, I do not agree with the wording of headline Objective 4: “To minimise the consumption of natural resources”. Better wording is “To minimise the consumption of non-renewable resources and use natural resources sustainably”.

Should the entry under Option 2: “and the use of construction and demolition material” read: “and the *reuse* of construction and demolition material”?

It is not clear to me why Option 2 and 3, and not Option 1, should “result in sustainable resource management”.

The “weakness” identified for Option 1: “Dispersed settlements may lead to inefficient use of resources” seems to conflict with the corresponding “strength”: “Dispersal of development will place a reliance on sourcing local materials”. If “inefficient” refers to the need to transport materials, local sourcing would surely increase efficiency. If it does not refer to transportation or materials, to what does it refer?

Bewilderingly, similar “weaknesses” are identified for Options 2 and 3: “Concentrating development within key locations could lead to less efficient use of resources.” The sentence continues: “and greater economies of scale”. Economy of scale is a strength, not a weakness!

Under Headline Objective 5, it is stated that for Option 1, “Proposals will seek to site development on previously developed land”. This is surely an objective for **all** options.

Re Headline Objective 6, it is stated under Option 1 that “The skills base and employment sites may not be fully utilised, resulting in a decline in investment and regeneration”. This will not happen if work-related development runs in tandem with housing development and occurs in response to local need and skills. This view is echoed by Policy 12 of the Cornwall Structure Plan 2004 (on-screen page 168 of the SEA/.SA): “the need for better quality employment opportunities suitable to meet local skills”.

Re Headline Objective 7, I cannot think of any reasons for the differences under “Strengths” for the different options apart from the addition of “within principal settlements” under Option 3. I also see no reason why Option 1 should have the weakness “The dispersal of benefits may widen impacts on the environment”. I would reiterate the fact that towns in North Cornwall are not like major urban areas elsewhere – they are significantly rural in nature and contain a lot of green areas, which are just as vulnerable to environmental damage, and just as important to the landscape, as those outside the towns.

A greenfield site within Launceston is shown in a photograph later in this submission. The fields on both sides of the ancient Cornish hedge depicted have now been destroyed for a housing estate and part of the proposed Kensey Link Road, despite substantial, well-founded and determined local opposition. This has caused great distress to residents on both sides of the development, for whom the beautiful semi-wild landscape was highly valuable.

If care is taken to ensure that development in the rural areas is locally appropriate, it should not be damaging to the environment. In many cases it may *enhance* the natural environment, with hardwood coppice forestry being a potential form of work-related development, for example. Perhaps this is another area where confusion results from addressing housing and employment together – the effects can be highly divergent, especially if one is out of kilter with the other.



Page 87, Clause 5.83 states “Three strategy options were presented which respond to increasing levels of growth within the District.” Is this the case? The options actually seem to me to promote growth rather than respond to it.

I agree absolutely with Clause 5.86: “Recommendations: A detailed assessment of the type and density of housing should be undertaken on a settlement by settlement basis informed by local needs.” However, in light of the emphasis elsewhere on *directing* development, I suspect that my interpretation of “informed by local needs” is more literal than is interpretation by the council and its advisors. Perhaps the Clause would be clearer if the word “required” were added after “housing”.

I agree with Clauses 5.89 and 5.90.

Re Clause 5.92, “bad neighbour developments” needs to be defined. My comments on the minimising of car parking provision can be found above.

I agree with Clause 5.94.

I am pleased to see the points in Clause 5.95: “Opportunities must be explored where development can make a positive contribution to the environment” and “remembering that it is the environment which is drawing a significant number of people to the area” which I have already pointed out above.

I agree with Clause 5.97.

I agree with Clause 5.98 except that I would change “This commitment should include both residential dwellings and large businesses” to “This commitment should include both residential dwellings and businesses”. If any of the requirements are found to be unaffordable by some businesses, the council should provide financial assistance as it does to deprived residents.

Clause 5.99 is flawed in that it confuses energy generation with energy conservation. Suggested alternative wording:

“The LDF should take a favourable approach to new solutions to reduce fossil fuel and water consumption elsewhere, for example through new road infrastructure works, signage and community schemes (i.e. small scale wind turbines or biomass plants).”

I agree mostly with Clause 5.101, but with my previously-stated reservations about minimising car parking provision, my earlier recommendation to extend the requirement for green travel plans to medium-sized businesses and my earlier suggestions re businesses in a given location co-operating to produce joint green travel schemes.

I agree with Clause 5.102 although, because North Cornwall’s towns are small and serve the surrounding countryside, responsive public transport services are likely to be appropriate here as well as in the more remote locations.

I agree strongly with the recommendation in Clause 5.103 that the District Council should liaise with the county council. This should also apply to transport issues.

I agree strongly with the recommendation in Clause 5.104 that the council should challenge developers. Perhaps it could also seek out Green developers and architects rather than simply inviting tenders from all-comers (if this is legal). I would especially like to see the council exploring thoroughly ways of bringing empty and under-used properties into full use before any consideration is given to newbuild, for reasons given above.

Clause 6.2. refers to “how people’s patterns of behaviour will change as a result of development”. As I have stated above, I believe that this approach is the wrong way round, and that development should occur as a result of local need. Nowhere have I found any justification for the converse.

On the same page is it stated: “Proposals could offer opportunities for investing in environmental improvements close to population concentrations, resulting in the creation of high quality and wildlife rich open spaces.”

Elsewhere in the SEA/SA it is stated re Proposal ENV1: “Although reference is made under “natural environment” to nature conservation and landscape, consideration should also be given to air, soil and water quality and visual impacts.”

When wild habitat is destroyed, a whole ecosystem is destroyed, including the physical, chemical and biological composition of the soil. This cannot be recreated. For this reason, destruction of wild habitat should be an absolute last resort and should **never** take place in speculative developments. This is relevant to attempts to offset losses of wild habitat by creating new wild habitat through “planning gain”.

On the same page it is stated: “The effects on travel patterns are difficult to determine...Of these factors perhaps the most significant influence is the cost of fuel...” As someone who follows debates and policies on transport with great interest, I have encountered arguments that fuel prices have little impact on levels of private vehicle use. Perhaps more important factors are the high cost and poor availability/quality of alternatives. Again, it might be illuminating to ask what might persuade the authors of the document to use alternatives to private motor vehicles! At the very least, perhaps the authors needed to research this issue rather than making assumptions and, if they did conduct such research, links to evidence would have been helpful.

I partly agree with the wording in Clause 6.9 on pp 92-3: “reasonably paid jobs” in contrast to the wording in the Draft Core Strategy, for example “pay rates at least on par with the national average” (page 7), “well paid work” (page 8), “an average wage at least as high as the national average” (page 10), “well paid jobs” (page 11), and “well paid employment opportunities” (page 24). 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.

Also, as with the Draft Core Strategy, I would prefer to see the term “work” or “paid work” rather than “employment” or “jobs”, to include the high percentage of people in North Cornwall who, like myself, are self-employed. Thus: “reasonably paid work” or “adequately-paid work”.

Clause 6.12 on page 93 is headed: “Provision of new development consistent with identified housing and employment needs”. This is, in my view, essentially the goal which the council should pursue, but with the caveat that there should be no newbuild until existing actual and potential dwellings and workplaces have been brought into full use. I would also replace “employment” with “work” for the reason given above.

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.

Clause 6.14 states: “It is also uncertain whether priority given to the location of services and facilities in towns will merely exacerbate the disparities between urban and rural locations, resulting in higher levels of social isolation and commuting. In order to encourage connectivity between urban and rural areas, realise an efficient, affordable and achievable integrated transport network and encourage a modal switch, a full assessment needs to be made of travel to work patterns to and from the six towns identified.”

As I have stated above, and if the statement in Clause 6.12: “Provision of new development consistent with identified housing and employment needs” were properly followed, such problems would not occur. If housing and work opportunities were met according to local need, people would be able to work closer to home, in addition to which teleworking can enable many people to work *from* home.

I also reiterate the fact that, 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.”

Thus the phrase “disparities between urban and rural locations” cannot apply to most parts of the district.

I agree strongly with the heading for Clause 6.15: “Facilitate and promote sustainable patterns of development and sustainable communities”. Facilitation and promotion, as opposed to direction, are, in my view, the correct services for councils to provide.

I agree with most of Clause 6.17 (page 94) but am slightly bemused by the stated need to “restrain in migration of a highly skilled workforce”. This seems to suggest that only unskilled people should be encouraged to move into the district! I do believe

that there should be measures to deter in-migration, such as giving preference to residents and people born/brought up in the district when properties become available to rent or purchase, perhaps providing low-cost mortgages to such people. There should also be maximal effort to reduce second-home ownership. There are enough second homes to provide all the homes stated as being required - 4,900 in 2003 - with plenty to spare.

I agree strongly with Clause 6.18.

I agree strongly with this part of Clause 6.19 (page 95): “By enabling the rural economy to grow and diversify rural communities will be supported, and this could reduce levels of out migration, sustain a mixed demographic profile within settlements, offer flexible working and reduce the need to travel.”

I have reservations about Clause 6.20 (page 95) where it claims that concentrating development in highly accessible locations will reduce the need to travel by car, especially in the context of the subsequent reference to “evening and late night land uses”. I do not know the situation elsewhere, but Launceston has, to my knowledge, no public transport provision in the evenings, and very little at other times, so any reduction in car travel will be largely, perhaps mostly, dependent on major improvements to public transport provision.

I question the assertion in Clause 6.22 that “Concentrating development in existing town centres is the most sustainable option.” What is the evidence for this? Elsewhere, including in this clause and in Table 5.1, the SEA/SA points out potential adverse effects of concentrated development on the environment and social cohesion. A specific amount of land **anywhere** has a finite carrying capacity and, if this is exceeded, there is irreversible environmental damage.

Clause 6.23 is headed “Development reflects the housing needs of the district”. I agree with this and with most of the clause, apart from the assertion that “The provision of sufficient affordable housing should...support local economic growth.” As has been noted elsewhere, not all parts of the district need to grow economically, and some locations have already reached or exceeded their environmental capacity.

Clause 6.24 on page 96 is headed “Opportunities to maximise the provision of affordable housing” but the text does not seem to relate to opportunities. It also reiterates an inferred association between affordable housing and public transport, as though only poor people are expected to use public transport, when **all** development should be close to the services referred to in this clause as far as possible.

Clause 6.25 is almost identical to Clause 6.23. As I stated re that clause, I do not agree that economic growth is necessarily always desirable. Economic growth is surely only needed where there is deprivation. Otherwise it is not sustainable.

I agree with this part of Clause 6.26: “...care needs to be taken to ensure development respects local character, seeks to accord with sustainable construction and design principles and is sited on previously developed land or reuses existing buildings where possible.” However, I do not agree with the emphasis on **directing** development rather than facilitating development in response to local need. I am pleased to see the

reference to self-sufficiency, but believe that it should be encouraged and facilitated for all community sizes, not just major villages and those with existing facilities.

Clause 6.27 is headed: “Restrain development in coastal areas which have a high incidence of tourist activity”. One of the best ways to do this is to bring the huge proportion of properties in such areas which are currently second homes into full use by people actually living there. For example, in 2004, percentages of residential properties which were second homes included the following:

<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](http://www.ncdc.gov.uk/media/adobe/r/8/Second%20Homes%20in%20North%20Cornwall.pdf)

Bringing second and empty homes into 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.

Clause 6.28 is headed: “Other villages should deliver housing to accommodate locally generated need”. As I have said before (many times!) I believe that this should be the case everywhere, and cannot see any justification for a different approach.

The sentence “It is assumed that the delivery of housing through local generated need could provide a justifiable argument for improved public transport infrastructure” is consistent with my view that all development and service provision should follow identified local needs.

I agree partially with Clause 6.29, particularly with regard to services and infrastructure being provided where they are most needed, but with reservations with regard to the provision being through planning gain, as I am concerned about the potential for bribery and corruption.

I agree with Clause 6.30. on page 97. The historic and cultural environment would be best preserved through bringing empty and underused properties back into full use.

I agree with Clause 6.31 apart from the assumption that development will have an adverse impact on the environment. I believe that if the environment and sustainability are used as the cornerstones for determining whether and what kind of development is permitted, there should be no adverse impact. Indeed, the council should not accept those which will have net adverse impacts on the environment either at and near the development site or elsewhere (e.g. where materials were produced). This requires a shift in thinking away from the way things are currently done, and a genuine determination to achieve sustainability.

I am pleased to see the absolute stipulation in Clause 6.31: “Care should also be taken to avoid development in flood risks areas.” This has not been the case to-date, with the new housing estate in the Kensey Valley, Launceston, being partly on the flood plain.

Clause 6.32 asserts, similarly to Clause 6.22 that “Concentrating development where a choice of transport modes is offered is the most sustainable option” but does not provide evidence to support this, and also refers to unsustainable aspects of this option. I would also reiterate the fact that towns in North Cornwall are not like major urban centres in other parts of the country. Because of this, the same kinds of public/community transport provision (e.g. demand-responsive services) are likely to be appropriate in the towns as in the more-remote areas.

### **Appraisal of the LDF Core Strategy Objectives**

I do not understand the basis for the concern expressed in Clause 6.34 (pp. 97-8) that “renewable energy development such as wind turbines may not be in accessible locations”. Accessibility for wind turbines is only an issue during construction, maintenance and demolition, so major traffic movement would not be generated by such development. For some renewables, notably biomass, good accessibility *is* necessary as there will need to be regular deliveries of the biomass to, and removal of by-products from, the plant.

I agree strongly with the points about the proportion of employment to be allocated to previously-developed land, and the reuse of existing buildings, but would not present them in the form of a question. Instead I would use wording such as “There should be reference to the proportion of paid work provision to be allocated to previously-developed land, as there is in relation to housing, and objectives should also refer to the reuse of existing buildings for paid-work purposes.”

Similarly, I would reword the subsequent point: “Opportunities for mixed-use developments should be considered in the objectives.”

I would reword the next point: “In more rural locations where conventional public transport provision may be more difficult to achieve, other mechanisms should be explored and, where possible, put in place to reduce vehicular trips (e.g. IT and community transport schemes).” I am not sure why the phrase “Broadband and IT” is used repeatedly in the documents, when surely Broadband is a *type* of IT. See <http://www.nd.gov/itd/planning/definition.html> for a definition of IT. Perhaps more appropriate and clearly-inclusive is the term “ICT” which appears several times in the SEA/SA.

I echo the SEA/SA's queries in Clause 6.35 (page 98) as to the lack of consistency between the headings in Section D "Spatial Objectives" and the points listed under them. See my comments in my submission on the "Draft Core Strategy".

I also support the additions suggested in the SEA/SA.

I strongly support the sentence in Clause 6.40 on page 99: "North Cornwall District Council should also consider incorporating sustainable design and construction guidance into the planned North Cornwall Design Guide Supplementary Planning Document."

This will presumably require the council to inform itself about such matters. I recommend the following sources of information:

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

<http://www.hockerton.demon.co.uk/>

<http://www.cat.org.uk/information/catinfo.tmpl?subdir=search&command=search&db=../information/catinfo.db&eqSKUdatareq=20011214105915&start=1> and

<http://www.cat.org.uk/consultancy/consult.tmpl?subdir=consultancy>

Point (c) of the SEA/SA's suggested amended wording for Core Policy is poorly worded. Climate change, at least in this context, is 100% due to greenhouse gas emissions, which can be reduced by a reduction in the burning of fossil fuels. This in turn can be achieved through efficient energy use, renewable energy technology and reducing motor vehicle traffic. My suggested new wording is:

"minimise the district's contribution to climate change by reducing the burning of fossil fuels, achieving this through efficient energy use, renewable energy technology and a reduction in motor vehicle traffic."

Point (d) of the SEA/SA's suggested amended wording for Core Policy is also poorly worded. It reads: "minimise the consumption of natural resources including water, minerals, soils and the generation of waste". This means that the generation of waste is a natural resource! In light of my previously-expressed concerns about the word "natural" above, I suggest the following alternative wording:

"minimise the generation of waste and the consumption of non-renewable resources, including minerals and soils, and use natural resources, including water and biomass, sustainably."

Point (e) of the SEA/SA's suggested amended wording for Core Policy requires clarification through improved grammar. My suggested wording is:

"achieve and promote sustainable land use and built development, including sustainable, high-quality design and construction, reuse of materials, and the siting of development in low-flood-risk locations."

For reasons given above, I would change the recommended wording for Core Policy 3. Item 1 from “minimise the consumption of natural resources” to “minimise the consumption of non-renewable resources and use natural resources sustainably.”

I do not agree with the hierarchies for development location because I advocate that development should occur in response to local need. The council’s job should be to ascertain the need and to facilitate and control development which arises from this need, not to direct it to specific locations. I would add here that the best way to meet the objectives of minimising consumption of non-renewable resources, using renewable resources sustainably, minimising the use of greenfield sites and avoiding harm to natural, historic, built and cultural features of acknowledged importance is to bring existing empty and underused properties into full use rather than building new ones. The consequent revitalisation of communities will have the desirable consequence of improving the viability of public transport systems, which will facilitate the reduction of private car use which is also an objective. It will also help to fulfil the objective in item 1(a) of Core Policy 3 of “having regard to the function and character of each centre and existing or potential capacity to provide necessary infrastructure.” Much such infrastructure will already be in place or able to be brought back into use relatively easily.

Page 103 of the SEA/SA looks at Core Policy 4 (Affordable Housing) and states: “6.48. Affordable housing is a critical issue for North Cornwall, like the remainder of the county. Low average earnings in the district and high house prices exacerbated by second home buyers and incomers with disposable incomes or higher incomes have resulted in a significant proportion of people unable to afford to rent or purchase properties on the open market.”

These problems are absolutely fundamental to the inability of local people to afford homes. The problem is not a lack of properties but that fact that so many are unused and underused. The disparity in incomes between residents and incomers is likely to be less easy to address than discouraging second-home ownership and in-migration. So I believe that the council should take urgent steps to focus the maximum possible amount of resources on finding and implementing solutions to these problems. I do not believe that they are insurmountable, and believe that my suggested approach will achieve the provision of affordable housing in the most resource-efficient way. A large number of policies and objectives would be unnecessary as, for example, the issues of where, what and how to build would be irrelevant.

I do, however, strongly agree with this part of Clause 6.49 (page 103): “...successful reduction of car dependency. This will only be achieved if affordable and accessible public transport is provided between rural and urban areas, other community transport schemes are developed...” but with reservations. One is detailed above with regard to the terms “flexible working” and “IT and Broadband”. The other is that, 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.”

Thus the phrase “accessible public transport is provided between rural and urban areas” requires rephrasing (and perhaps the policy requires fresh scrutiny).

I agree with Clause 6.50 with regard to the lack of clarity as to the meaning of “through site allocation and on an exceptional basis”.

I am very pleased to see reference here to the need to state explicitly how local need is to be determined.

Clause 6.51 on page 104 repeats the unfortunate perceived correlation between affordable housing and public transport. If care is taken to include stipulations for accessibility via modes other than private cars for **all** development (for housing *and* work), it will be unnecessary to include them in sections specifically relating to affordable housing.

I disagree strongly with the mere “50% development yield” of affordable housing in any development, and especially “When a community housing need has been established” (Item 1 of recommended changes for Core Policy 4). When a community housing need has been established, development should aim to fulfil this need – no more, and no less.

As with the previous Core Policy, I do not agree with the hierarchical approach or the policy of directing development. It is inconsistent with a policy of striving to meet local needs.

I do not agree that the District Council’s criteria for local need should be limited to “key or essential workers and those with a family connection in the area.” They should also include all long-term residents, especially those who are in paid work, unable to work through disability, or retired.

I agree with the recommendations on page 105 of the SEA/SA that new development should reflect high(-)quality sustainable design and construction principles.

I agree with the additions in the SEA/SA to Item 1 of Core Policy 5 apart from the poor grammar. Also see my comment under “Draft Core Strategy”.

I agree generally with the additional item on page 106 in the SEA/SA for Core Policy 5:

“The suitability of employment land will be assessed against the availability of previously developed land/buildings, low flood risk areas, the impact on adjacent businesses and communities, it’s proximity to sustainable modes of transport, sustainable communities and future market growth.”

My main reservation (apart from the poor grammar!) is the term “sustainable communities”. Does this relate to “proximity” or is it supposed to mean that the employ-

ment should contribute to the sustainability of the local community? If it does not relate to proximity but has the other meaning which I suggested, clarity would be improved through re-ordering, viz.:

“sustainability, future market growth and proximity to sustainable modes of transport”. (I removed the reference to communities as they are mentioned earlier. However, further re-wording may be required if I have misconstrued the meaning of the phrase.)

I agree strongly with the point in Clause 6.55 (page 106) that “the purpose of protecting and enhancing the environment is not solely to improve people’s quality of life, but also to provide benefits to the environment itself”. We share this district with numerous other species, and should avoid being excessively anthropocentric. We are the custodians of the natural environment, and should take a more conscientious, responsible approach towards it than is commonly the case. Other species also have the right to live, and we should not feel that we have the right to destroy wild habitats simply because they have no official environmental designation or because no protected species have been identified there. It should be borne in mind that we know relatively little about the prevalence of the vast range of species with which we share the district, and the fact that no rare species have been identified in a location does not mean that such species are not present. My experience with the Cornwall Wildlife Trust (reported above) illustrates the weakness of protection for wild species and their habitats.

The precautionary principle should always be observed when considering any development where there is wild habitat, whether or not the land has been previously developed. **Thorough** environmental surveys should be carried out with the help of local people, **before** planning permission is granted, as I have recommended above. If the site turns out to be highly biodiverse, to support protected species or to form an important part of an ecosystem, development of the site, or the valuable part(s) of the site, should not be permitted. At present, there seems to be a presumption in favour of development, with the only protection for the natural environment being requirements to minimise and/or mitigate damage. This is unsustainable and therefore unacceptable.

The wording in Clause 6.56 (page 106): “inform planning for increased flood protection through climate change” is poorly chosen and could be interpreted as advocating climate change to inform planning! If I have understood it correctly, better wording might be “inform planning for increased flood protection in the light/event of climate change”.

I agree strongly with Clause 6.57 (apart from the poor grammar).

I agree generally with the SEA/SA’s rewording of Core Policy 6 apart from “the quality of...minerals” as I cannot think of a way in which development can affect the quality of minerals.

Clause 6.62 on page 109 states: “Inevitably there will be environmental impacts associated with providing the required housing, employment land and associated infrastructure to meet the needs of the District over the period to 2016.”

If development occurs in response to, and in keeping with, local need, and if maximal effort is put into using existing buildings, I believe that adverse effects will be extremely small. Unfortunately, reliance on profit-based development companies and the policy of deciding, apparently in the absence of evidence for local need, how many properties should be built and where, militates against such **genuinely**-sustainable development. Until these fundamental policies are changed, sustainability will be unachievable, and the word will just be a meaningless add-on to “business-as-usual”.

I agree strongly with most of Clause 6.64 (page 109) apart from the phrase “Broadband and IT” (see above for reasons) and the confinement of requirements to submit Green travel schemes to “urban areas”. 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.”

All developers and all medium-to-large businesses everywhere should be required to submit Green travel schemes, with co-operative schemes for a number of businesses being appropriate in some instances.

In Clause 6.66, one point on page 110 repeats the phrase “inform planning for increased flood protection through climate change”. See my suggested alternative wording above.

I agree strongly with most of the subsequent point, except that I would not want Green travel plans to be required only of *major* employers (NB the SEA/SA erroneously cites “employees”) or *large-scale* businesses. Developers of work sites, as well as employers, should also be required to ensure that there is optimal access by foot, cycle and public transport.

I agree strongly with the point on the same page:

“The North Cornwall Design Guide SPD should include reference to the reuse of construction and demolition materials on site, for example through planning conditions requiring developers to provide a demolition plan. It should advocate sustainable construction and design principles including the sourcing of local materials to reduce vehicular trips, minimisation of waste generation, reduction in energy and water consumption and sustainable urban drainage schemes.”

However, with regard to sustainable urban drainage schemes, I am concerned as to whether or not these are relevant to rural settings, as most of North Cornwall is rural or semi-rural, including the towns, as I have stated above. 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.”

On page 111 of the SEA/SA, Clause 7.1 states: “7.1. The SEA Directive requires that the significant environmental effects of implementing a plan or programme should be monitored in order to identify at an early stage any unforeseen adverse effects, and to be able to undertake appropriate remedial action. SA monitoring will cover the significant sustainability effects as well as the environmental effects.”

I have noted the term “significant” elsewhere in the local planning documents. Is there an official definition of “significant”? If not, it will be hard to implement such requirements.

In the table starting on page 116, the second sentence of the entry under “Implications for LDF”: “Requires compensatory measures for negative conservation impacts if development has to proceed non grounds of human health and safety” does not make sense. Should “non” be “on”? Does it refer to development being permitted, commencing, continuing or any/all of these?

With regard to protection for birds, referred to in the table, I hope that this will be implemented more rigorously than in has been in the recent past. A number of local people had stated that a greenfield site near my home was a feeding ground for barn owls, and that they nested on adjacent land. One of the main threats to barn owls is loss of feeding habitat, and another is vehicle traffic. Yet NCDC gave planning permission in April 2002 for a housing estate to be built on this land, despite being advised about the likely presence of barn owls. A piece of planning gain from this development was part of what is planned to become a relief road – running through the housing estate and across more fields which may be barn owl feeding habitat (indeed these fields may now be even more vital following the loss of such a large area to housing).

Thus I can perhaps be forgiven for being less-than-optimistic about the implementation of the laws and guidelines referred to, and for my cynicism about planning gain, which I fear may sometimes be allowed to override all other considerations. Details of the supposed protection of, and threats to, barn owls can be found at, for example

<http://www.wirral.gov.uk/ed/biodiversity/bowl.htm>

I agree with the entry under “Implications for LDF” for the Convention on Biological Diversity, Rio de Janeiro 1992: “SEA should consider biodiversity impacts within its objectives. It should take a holistic view of ecosystems rather than a focusing on ‘islands’ of protected species.”

Under the entry for the Johannesburg Declaration of Sustainable Development 2002 (page 120 of the SEA/SA), one of the bullet points is “Remove market barriers and create a level playing field for renewable energy and energy efficiency”. A way in which councils can contribute to this is to ensure that grants available for the installation of central heating give equal or preferential treatment to renewable

options. As I have stated above, when I applied for a grant for central heating I was offered oil-fired or nothing, until I protested. A friend accepted the oil option with great reluctance, as NCDC would not fund central heating run from a Rayburn, which could have used renewable natural resources such as wood, sawdust waste, etc.)

Another way in which councils can contribute to the levelling of the playing field for renewables is to offer grants for domestic-scale renewable generation. I have received numerous offers of energy-efficiency grants from NCDC now (I took up the offers years ago), and I have received more energy-saving light bulbs than I can use (I know that I am not alone in this). Perhaps North Cornwall is now close to saturation coverage for such provision, and the council should switch at least some of its grant aid to renewable electricity generation.

The entry under “Implications for LDF” for the Waste Framework Directive (91/156/EEC) (page 121 of the SEA/SA) appears to imply that NCDC has some control over waste disposal and processing. If it has any power over such things, I would urge it to use any pressure available to it to avoid the exportation of waste, either to other parts of the UK or abroad, as this is inconsistent with reducing greenhouse gas emissions and, in the case of exporting waste abroad, the receiving countries often do not adhere to standards of environmental and human safety which would be required in the UK.

Under “Environment 2010: Our Future, Our Choice (EU Sixth Environment Action Programme)” (page 121) there is reference to “sustainable use of natural resources”. This is better wording than “minimisation of consumption of natural resources” which occurs several times in the Draft Core Strategy. An alternative suitable wording is on page 51 of the SEA/SA: “Prudent use of natural resources”. My reasons for these preferences are given above.

The entry under “Implications for LDF” for the Directive to Promote Electricity from Renewable Energy (2001/77/EC) (page 124) states: “Spatial planning can have a major influence on the viability and take up of renewable energy”. This is the view evidenced by other statements in the SEA/SA, such as Clause 5.29 stating of Option 1 that “this option could encourage the widespread incorporation of energy efficiency in design/construction and the use of renewable energy sources at a community level”, and I am not aware of any evidence for this. It is becoming increasingly recognised that the localisation of energy generation has great efficiency advantages, with much less energy lost through transmission, and local, small-scale generation can be implemented anywhere.

Clause 5.31 states re Option 2 (To focus future development on the four largest towns): “It should generate and encourage the retention of a wider skills base, support the use of renewable energy, energy efficiency in design and construction and reduce natural resource consumption.”

Does this mean that these outcomes are anticipated or simply desirable? I do not know on what evidence these statements are based, and would question whether spatial planning really does have a significant influence on renewable energy viability and take-up.

I strongly agree with the statement under “Implications for LDF” for the Directive to Promote Electricity from Renewable Energy (2001/77/EC) (page 124): “The relationship between renewables technology and the economic benefits to region should be considered.”

I believe that there are substantial economic benefits to be had from renewables technology and generation, including the growing of biofuels. One of the most holistically-beneficial renewables is anaerobic digestion of waste. This:

- produces renewable energy;
- deals with all kinds of organic waste;
- produces liquid and solid fertilisers;
- can be implemented on a wide range of scales;
- can replace fossil gas for electricity production, heating, cooking and (e.g. compressed) as vehicle fuel; *and*
- can reduce the need for long-distance pipelines.

Under “PPS 1 – Delivering Sustainable Communities” (pp. 124-5) there is reference to “sustainable economic development”. I would like to see this term replacing “economic growth” throughout council and associated documents, as high economic growth is not sustainable except in a context of relieving genuine deprivation.

PPG3 (Housing) (page 126) states: “Place the needs of the people before ease of traffic movement.” I trust that this will be adhered to, and the Kensey Link Road, for example, will not be permitted, as it would dramatically increase traffic volume and speed through the new Kensey Valley residential estate.

A key principle listed under “PPS 9 – Biodiversity and Geological Conservation Draft (2004)” (which starts on page 226 of the SEA/SA) is: “Plan policies and planning decisions should be based upon up-to-date information about the environmental characteristics of their areas.”

During the campaign to try to prevent the greenfield-site development near my Launceston home, I was told that once planning permission had been granted for a site, no future applications for the site could be refused on the grounds of its environmental characteristics, including flood risk, even if new evidence came to light which would have prevented such original permission being granted if it had been known. I trust that this is no longer the case.

It is also pertinent here to paraphrase what I have stated above:

Maps supplied for the 1997 exhibition and consultation on the Kensey Link Road in Launceston gave no hint that the road is planned to cut through wildlife-rich countryside, and this is likely to have influenced public, and perhaps council, opinion on the desirability of the road, as the area is not well known even to people living in the town.

A photograph later in this submission shows part of the route of the Kensey Link Road before the fields on both sides of the ancient Cornish hedge depicted were destroyed, despite substantial, well-founded and determined local opposition. This has

caused great distress to residents on both sides of the development, for whom the beautiful semi-wild landscape was highly valuable.

On page 129, under “Implications for LDF” for PPG 21 – Tourism, I dispute the claim that “Promoting tourism would increase prosperity and employment (population objective in SEA), however it is important to recognise the potential conflicts between tourist developments and other environmental objectives.”

It is not only environmental objectives which can be incompatible with tourism.

- (a) Properties which are only used as holiday cottages contribute to parts or the whole of towns and villages becoming almost deserted outside the main holiday season, and it is unlikely that this can be fully countered by attempts to promote year-round tourism. These underused properties can not only reduce the viability of local businesses (retail, catering, etc.) but also contribute to the lack of housing available for local people, who consequently have to leave the area. It is not economically or socially sustainable to be over-reliant on tourism.
- (b) Land used to build hotels and other tourism facilities might provide greater benefits if it were used for other purposes, such as affordable housing or more sustainable, year-round paid work.

On page 130, under “Implications for LDF” for “Working with the Grain of Nature”: A Biodiversity Strategy for England (2002), the SEA/SA states: “The SEA aims to integrate biodiversity into local plans by highlighting interaction between land use and wildlife.” Sadly, one of the commonest interactions between land use and wildlife is road kill, to which I have referred above in relation to barn owls. I trust that more care will be taken in future decision making to avoid such carnage.

On page 130, under “Implications for LDF” for “Our Energy Future – Creating a Low Carbon Economy”, I am pleased to read that “LDF should encourage development of renewable energy facilities and along with the LTP, attempt to reduce the need for long distance car travel.” I hope that will include the actions which I have recommended above, such as providing grants for domestic-scale renewable generation and renewable home heating systems and requiring developers and businesses to use renewable and energy-efficient design and technology. NCDC should also reduce long-distance **freight** transportation by encouraging the local sourcing of goods (and indeed ensuring that NCDC itself adopts this practice to the maximal extent). Additional benefits of local sourcing include keeping money within the district, providing work in the district and reducing the problems associated with delivery in town centres, as local producers are likely to be able to be more flexible with regard to delivery times.

The agricultural sector is particularly well-suited to using renewable fuels such as biogas (which can, if required, be compressed in the same way as fossil-derived gas), bioethanol and biodiesel.

On page 131, under “Implications for LDF” for “Communities Plan (Sustainable Communities: Building for the Future) 2003” is the puzzling statement: “...low de-

mand for housing should be tackled within the LDF.” I have been in contact with LUC, who have explained that the reference to low demand is not relevant to North Cornwall. Along with other anomalies in the SEA/SA, such as references to cities, this gives me some concern that the SEA/SA is not as specific to North Cornwall’s characteristics and needs as it should be.

**I therefore suggest that if NCDC find anything in the SEA/SA puzzling or otherwise questionable, they should contact LUC for clarification in case it is not applicable to North Cornwall.**

The last sentence in this section reads “Target of providing between 6,000 and 10,000 affordable homes, as set out in the South West Regional Planning Guidance”. My alarm at this was allayed somewhat by reference to RPG 10, which revealed that this figure relates to the whole of the South-West, not for North Cornwall, and I would recommend that this sentence be reworded.

On page 131 under “Implications for LDF” for the Road Traffic Reduction Act, the SEA/SA states: “The Core Strategy should have regard to road traffic reduction and road safety particularly in rural locations.” I am pleased to note the reference to “road traffic reduction” and hope that NCDC understands that this is different from “reduction in road traffic growth rates” – it means an *absolute* reduction. A major benefit from this, in addition to improvements in the safety of pedestrians and cyclists and in the quality of life for residents, will be the removal of the need to build new roads or widen existing ones, and a reduction in road maintenance costs.

“DETR (1999). A Better Quality of Life, A Strategy for Sustainable Development for the UK” is quoted on page 131 of the SEA/SA as having an objective of “prudent use of natural resources”. As stated above, and for the reasons given above, I favour this term over “minimisation of consumption of natural resources”, which also occurs several times in the Draft Core Strategy.

Still relating to “DETR (1999). A Better Quality of Life, A Strategy for Sustainable Development for the UK”, on page 132 of the SEA/SA, one of the “ten guiding principles which Government policy will take account of” is “respecting environmental limits”. I hope that NCDC will start to pay more than lip service to these limits.

**Speculative housebuilding when there are already plenty of empty and under-used properties does not respect environmental limits.**

The next guiding principle is “the precautionary principle”. I reiterate my earlier statement in relation to this principle:

The precautionary principle should always be observed when considering any development where there is wild habitat, whether or not the land has been previously developed. **Thorough** environmental surveys should be carried out with the help of local people, **before** planning permission is granted, as I have recommended above. If the site turns out to be highly biodiverse, to support protected species or to form an important part of an ecosystem, development of the site, or the valuable part(s) of the site, should not be permitted. At present, there seems to be a presumption in favour of development, with the only protection for the natural environment being requirements



to minimise and/or mitigate damage. This is unsustainable and therefore unacceptable.

“HM Government (2005). Securing the Future – UK Government Strategy for Sustainable Development” (pp. 132-3) contains a set of shared UK guiding principles which include “Living within environmental limits”. See my comments above about environmental limits.

Another guiding principle is “Achieving a sustainable economy”. Local sourcing of goods will contribute substantially to this goal, as I have detailed above.

DETR (2000) Government Urban White Paper: Our Towns and Cities: the Future – Delivering an Urban Renaissance (pp. 134-5 of the SEA/SA) states: “We want to see... people shaping the future of their community...” This is consistent with my recommendation that development should occur in response to local need rather than being directed by councils. In the Draft Core Strategy, this policy only applies in rural areas. But 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.”

DETR (2000) Government Rural White Paper: Our Countryside: the Future – A Fair Deal for Rural England (pp. 135-6) includes the aim to “Rejuvenate market towns and a thriving rural economy”. This suggests strongly that towns in North Cornwall should be regarded as rural, or at least semi-rural, rather than urban, which is supportive of my arguments above.

My arguments on this issue are, in summary, that

- (a) development in *all* parts of the district should be in response to local need rather than being centrally directed, *that*
- (b) the policy of directing development risks leading to undesirable urbanisation (and there is no shortage of urban land in the UK, but there is a decreasing mass of truly rural land), *and that*
- (c) treating North Cornwall’s small towns as urban areas ignores the substantial areas of wild and semi-wild habitat within and around them, with the consequence that consultees and planners have a bias towards their inappropriate development.

A photograph later in this submission shows one such semi-wild habitat within Launceston - part of the route of the proposed Kensey Link Road and the site of a new housing estate before the fields on both sides of the ancient Cornish hedge depicted

were destroyed, despite substantial, well-founded and determined local opposition. This has caused great distress to residents on both sides of the development, for whom the beautiful semi-wild landscape was highly valuable.

My approach is also consistent with another aim of the DETR (2000) Government Rural White Paper: Our Countryside: the Future – A Fair Deal for Rural England, which is to “Preserve what makes rural England special”. North Cornwall’s small towns are part of what makes rural England special, and they must not have their character destroyed by centrally-directed and profit-driven overdevelopment.

Another aim of the DETR (2000) Government Rural White Paper: Our Countryside: the Future – A Fair Deal for Rural England is to “Give local power to country towns and villages”. See my comments above. This White Paper clearly does not view country towns as “urban”, and 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.”

The previously-cited White Paper “DETR (2000) Government Urban White Paper: Our Towns and Cities: the Future – Delivering an Urban Renaissance” covers urban areas, whereas the DETR (2000) Government Rural White Paper: Our Countryside: the Future – A Fair Deal for Rural England includes “country towns” or “market towns” as part of the countryside.

Objective 2 of the DETR (2000) Government Rural White Paper: Our Countryside: the Future – A Fair Deal for Rural England is “To maintain and stimulate communities, and secure access to services which is equitable in all the circumstances, for those who live or work in the countryside.” Again, this indicates that country towns (as they are included in this White Paper and not the urban one) should be treated in the same way (“equitable in all the circumstances”) as villages and other less-populated parts of the district, with respect to housing, employment and transport, whereas the Draft Core Strategy treats them differently in all these respects.

Objective 3 (page 136) is “To conserve and enhance rural landscapes and the diversity and abundance of wildlife (including the habitats on which it depends).” A key word here is “abundance”. This indicates that quantity is important as well as, say, rarity, and therefore that there should be a presumption against the destruction of any wild habitat. This goal would be most easily achieved by development proceeding only in response to local need, and by maximal use of empty and underused buildings, rather than permitting newbuild when there are still properties which require no more than renovation (and many which are already fully habitable).

Under the heading “Department of Education and Skills, (2002) Success for all, Reforming Further Education and Training – Our Vision for the Future” (page 141), the initial sentence “The Success for All strategy is a long term reform strategy aimed a

developing a high quality, demand led, responsive colleges and provides we need in the learning and skill sector” does not make sense, and it is hard to ascertain what is intended.

I am pleased to see the inclusion of “safe crossing point(s)” under “Implications for LDF” for the “Health & Well-Being” section of the regional plan or programme “A Sustainable Future for the South West: The Regional Sustainable Development Framework for the South West of England” (page 143). These are lamentably lacking in Launceston, where the motor vehicle appears to be given precedence over pedestrians and cyclists, perpetuating a vicious cycle of decreasing walking and cycling and increasing motor vehicle traffic. Below is my diagram illustrating the alternative “virtuous cycle” for reducing motor vehicle traffic.

I also welcome the aim in the same section of “Retention of greenscape for informal and formal recreation” which appears relevant to my comments above about green areas in and around towns, which currently seem to be regarded as appropriate for development, seriously affecting the quality of life of residents, many of whom will have, like myself, been attracted by the rural nature of the location despite it being officially part of the town of Launceston. A greenfield site within Launceston is shown in a photograph later in this submission. The fields on both sides of the ancient Cornish hedge depicted have now been destroyed for a housing estate and part of the proposed Kensey Link Road, despite substantial, well-founded and determined local opposition. This has caused great distress to residents on both sides of the development, for whom the beautiful semi-wild landscape was highly valuable.

I do not understand the piece in the same section: “Siting of development away from communities to minimise affected from air, noise and water pollution.” Apart from it not making grammatical sense, this appears to conflict with policies to direct development to existing communities. If it refers to health service provision, it would appear to conflict with the need for such facilities to be easily accessible by as many people as possible, ideally on foot or, for the mobility-impaired, by wheelchair, scooter, etc.

Under “Economic Development” on the same page, I perceive a conflict between “Circulation of wealth” and “infrastructure to support more sustainable economy”. Circulation of wealth implies, to me at least, multiple transactions, excessive transportation and a plethora of intermediates between the point of production and the point of consumption. This is not only environmentally unsustainable (e.g. due to excessive transportation and packaging) but also serves to add cost to goods so that they may become unaffordable to the poorer members of society. It benefits only the unnecessary intermediates and government coffers, which may be a reason why it tends to be favoured by modern societies. It is much more environmentally, economically and socially beneficial to *minimise* intermediacy. The ultimate minimisation of intermediacy is self-sufficiency, and one step removed from this are systems such as farmers’ markets and other kinds of direct trading. (It may be that I have misunderstood the term “Circulation of wealth”.)

In the same section, it is not clear to me what is meant by “community involvement in local economies”. It sounds as though it is consistent with the maximally-direct forms of trading which I referred to above.

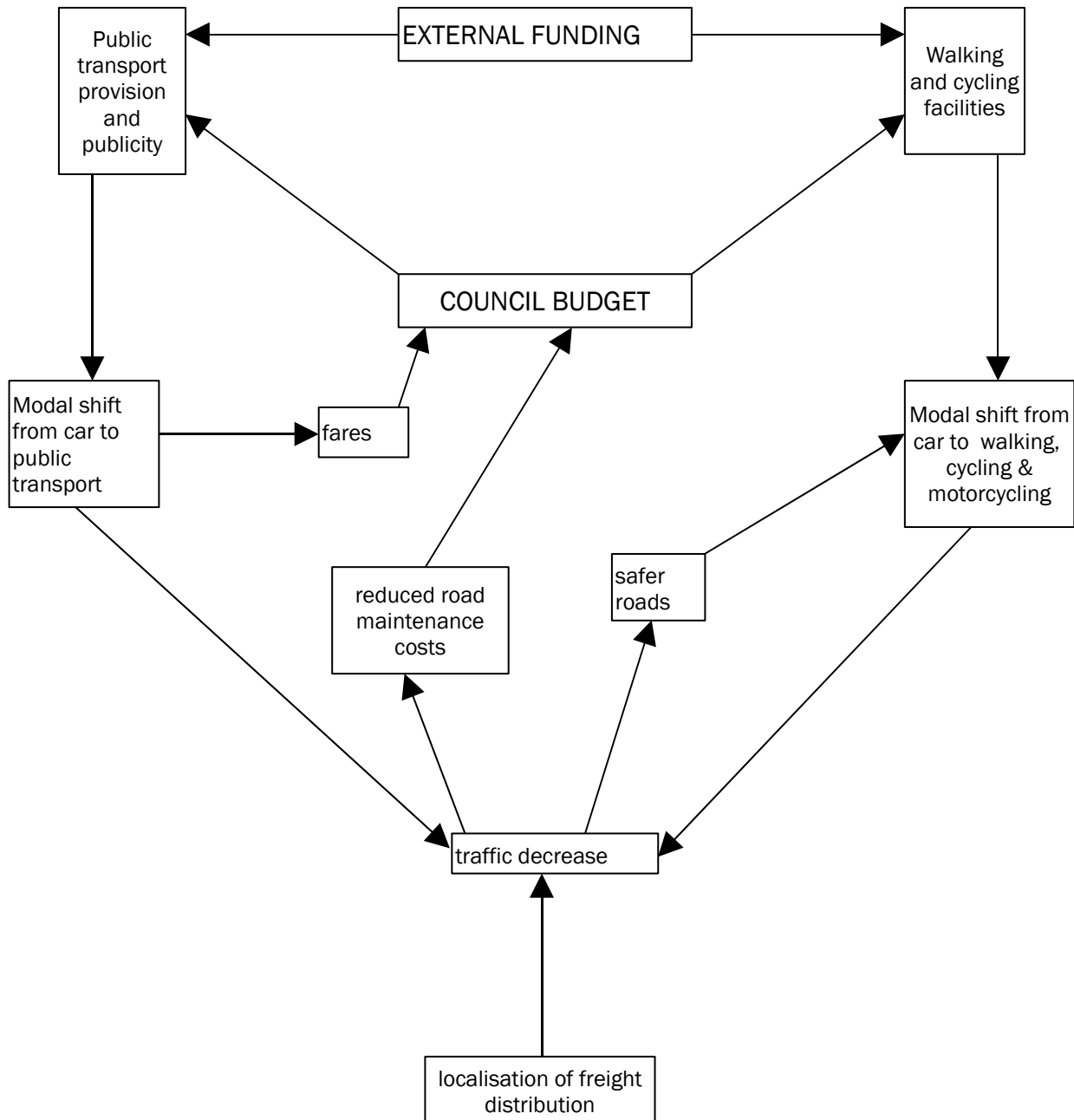


Figure 1 The 'Virtuous Circle' of sustainable transport policies

I do not know what is meant by “Improvements through investment to the public realm” in the entry under “Implications for LDF” for this section, and cannot see the relevance of the second part: “built and historic environment, green spaces and sites of nature conservation interest.” Is this a definition of “public realm”?

I am pleased to see the reference to “reducing vehicular trips etc” under “Implications for LDF” for the “Climate Change” section of “A Sustainable Future for the South West: The Regional Sustainable Development Framework for the South West of Eng-

land” and hope that NCDC understands that this is different from “reduction in road traffic growth rates” – it means an *absolute* reduction.

In the “Regional Inequality & Access” section of “A Sustainable Future for the South West: The Regional Sustainable Development Framework for the South West of England” (page 143) there is reference to “opportunity to work and to have their work recognised and valued by the community (whether paid or unpaid)”. I am pleased to see here an acknowledgement of the value of unpaid work, which often tends to be overlooked due to an over-emphasis on monetary transactions (see my comments above on “Circulation of wealth”). I hope that NCDC will take the value of unpaid work into account in its planning policies and processes. I consider that participation in consultations such as this should be treated as valuable unpaid work. It can be very time-consuming and, for self-employed people, especially disabled ones such as myself, can consequently reduce one’s income.

In the “Sustainable Communities” section of “A Sustainable Future for the South West: The Regional Sustainable Development Framework for the South West of England” (page 144) there is reference to the need to “provide a safe environment in which people feel secure”. A common cause of the actuality and perception of unsafeness is road traffic, so reducing this, and moving away from the “business-as-usual” practice of accommodating traffic by increasing road provision, are key to the provision of a safe environment. Less traffic leads to people feeling that they can walk and interact safely in their neighbourhoods, which in turn reduces crime and the fear of crime.

In the “Biodiversity & Landscapes” section of “A Sustainable Future for the South West: The Regional Sustainable Development Framework for the South West of England” (page 144) is the objective to “Protect and enhance the region’s urban and rural landscapes”. This must include the green spaces within and around the district’s small towns (i.e. **all** of its towns), which, as I have stated above, are a vital aspect of their character and their value for the quality of life of local residents.

A greenfield site within Launceston is shown in a photograph later in this submission. The fields on both sides of the ancient Cornish hedge depicted have now been destroyed for a housing estate and part of the proposed Kensey Link Road, despite substantial, well-founded and determined local opposition. This has caused great distress to residents on both sides of the development, for whom the beautiful semi-wild landscape was highly valuable.

I agree strongly with the “Implications for LDF” for the “Reduce the need for travel” subsection of the transport section of “A Sustainable Future for the South West: The Regional Sustainable Development Framework for the South West of England” (page 144 of the SEA/SA)

In “Implications for LDF” for subsection “Provide a safe environment for all” of the transport section of “A Sustainable Future for the South West: The Regional Sustainable Development Framework for the South West of England” (page 144 of the SEA/SA), is the phrase “mix of development / housing, the proximity of potential hazardous developments” intended to include the avoidance/reduction of conflict between motor vehicle traffic and cyclists and pedestrians? Perhaps this should be

made explicit in the document. For an example of such potential conflict, a road through a new housing development near my home is designated to become a relief road for through-traffic (the Kensey Link Road), despite the fact that the estate contains a number of public open spaces, the largest of which is immediately adjacent to the road. These open spaces are sure to be used as play areas by children, and this road scheme is clearly not conducive to safety.

In the “Natural Resources & Waste” section of “A Sustainable Future for the South West: The Regional Sustainable Development Framework for the South West of England” (page 144 of the SEA/SA) it states: “Ensure water, land, minerals, soils, forestry and other natural resources are used efficiently and with least environmental damage”. See my comments above with regard to the inappropriate term used elsewhere: “minimisation of consumption of natural resources”. The terminology in this section is much better, with other appropriate terms being “prudent use of natural resources” or “sustainable use of natural resources”.

I am interested to note that the section on “Business & Work” of “A Sustainable Future for the South West: The Regional Sustainable Development Framework for the South West of England” (page 144 of the SEA/SA) advocates: “Ensure all people have quality work opportunities both paid and unpaid.” See my earlier comments about unpaid work.

I am, however, bemused by the entry in “Implications for LDF” for this section: “The LDF will have to achieve a balance between promoting development, economic growth and the creation of employment opportunities whilst ensuring that the footprint of the city does not increase.” The inclusion of the word “city” suggests that this sentence has been copied from a document relating to an urban environment.

Another objective in “Business and Work” is to “Create more businesses and encourage existing ones to grow”.

1. How can a council be involved in creating businesses? Is this possible or desirable?
2. I believe that there is an optimal size for a business, so that enlargement sometimes has a negative rather than a positive impact, not only on the business in question but also on competitors. I hope that NCDC appreciates this and will not encourage inappropriate or damaging enlargement.

Also under “Business & Work” comes an objective to “Increase the number of social economy businesses” (page 145 on-screen of the SEA/SA). I was unclear about the meaning of “social economy” so did a Google search and found vague definitions at

[http://www.mpen.org.uk/social\\_economy.html](http://www.mpen.org.uk/social_economy.html)

Such businesses seem on the whole to be a good thing, but I wonder how the council could achieve the objective of increasing such businesses.

Under the subsection “Culture & Heritage” of “A Sustainable Future for the South West: The Regional Sustainable Development Framework for the South West of Eng-

land” is the objective to “Ensure the SW remains a region of diverse and distinct cultural landscapes and townscapes” (page 145). I agree strongly with this. As I have stated above, an important part of the landscapes of North Cornwall’s small towns is the green space in and around them. This should not be built on.

A greenfield site within Launceston is shown in a photograph later in this submission. The fields on both sides of the ancient Cornish hedge depicted have now been destroyed for a housing estate and part of the proposed Kensey Link Road, despite substantial, well-founded and determined local opposition. This has caused great distress to residents on both sides of the development, for whom the beautiful semi-wild landscape was highly valuable.

Under the subsection “Food & Farming” of “A Sustainable Future for the South West: The Regional Sustainable Development Framework for the South West of England” is the objective to “Reconnect farmers and food producers with local communities”. I believe that there should be an entry under “Implications for LDF” to the effect that NCDC should encourage and support farmers’ markets, farm shops and other mechanisms for reducing the number of intermediates between production and consumption. This is good for the local economy and also good for the environment, as it reduces transportation and packaging. I strongly support the entry under “Implications for LDF” about retaining agricultural land and allotments. I would like to see added an undertaking to encourage and support the subdivision of large farms into smaller units on which people can live self-sufficiently, and one to review agricultural land use with a view to increasing diversity, such as replanting orchards which were previously converted to pasture.

I do not support the tourism objectives apart from the phrase “and has the support of local communities”, for reasons given above, and reiterate some of them here. For tourism to be genuinely sustainable, visitors would have to use transport modes which emitted **no** greenhouse gases, accommodation would have to use only renewable energy, and all materials used to build and repair accommodation would have to be renewable or reclaimed. Until this is possible, tourism is not sustainable, and perhaps an alternative term needs to be used. “Low-impact” is a term which may be suitable.

As tourism is not sustainable, I do not consider that the council should promote it, or fund its promotion. Year-round tourism may be especially unsustainable (if it is achievable) as more heating will be needed during the cooler seasons.

Properties which are only used as holiday cottages contribute to parts or the whole of towns and villages becoming almost deserted outside the main holiday season, and it is unlikely that this can be fully countered by attempts to promote year-round tourism. These underused properties can not only reduce the viability of local businesses (retail, catering, etc.) but also contribute to the lack of housing available for local people, who consequently have to leave the area. It is not economically or socially sustainable to be over-reliant on tourism.

Land used to build hotels and other tourism facilities might provide greater benefits if it were used for other purposes, such as affordable housing or more sustainable, year-round paid work.

I do agree with the phrase under “Implications for LDF”: “spread environmental consciousness and encourage reinvestment in the local economy and environment.”

I do not understand why, in “Implications for LDF” for “An integrated Regional Strategy for the South West – Just Connect (2004-2026) , 2004” (page 146), an ageing population and the loss of younger population would create pressures on “housing supply - in particular affordable housing”. Is it not the case that those most in need of affordable housing are the young, and that a relatively high proportion of older people (compared with younger people) live in care or nursing homes and thus do not put pressure on housing supply?

Under “South West Regional Planning Guidance (RPG10)”, EN1 has the objective to “promote the restoration and expansion of depleted and vulnerable biodiversity resources in order to reverse fragmentation and create continuous viable habitats” and under “Implications for LDF” it refers to “protecting, enhancing and creating new habitats considering the protection and retention of wildlife/ green corridors.”

One type of green corridor which is highly valuable to wildlife is the Cornish hedge, and the older such hedges are, the more valuable. Yet a magnificent example of such an ancient hedge (see photos below) has now been fragmented by the construction of a housing estate near my home.

There are also plans to destroy a rare example of wet woodland to build the Kensey Link Road, instead of creating a link between it and another piece of such woodland to the east.

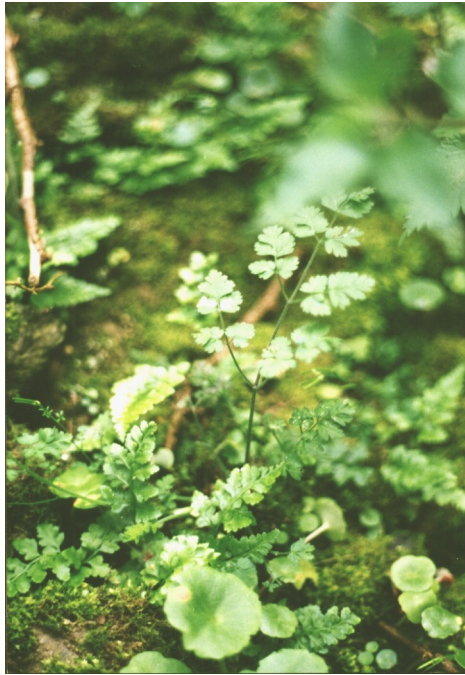
The Phase I Ecological Assessment for the Kensey Link Road states of this piece of land:

“This type of habitat has been recognised as a nationally important habitat and also as a habitat of county importance. Wet woodland has been identified as a UK priority Biodiversity Action Plan (BAP) habitat and a plan for its conservation has been written (UKBG, 1998-1999). Likewise, at a county level this habitat type is included within the Wetland priority County BAP habitat and a plan for its conservation has also been written (CBI, 1997-1998)...It provides an area of semi-natural habitat within an urban and agricultural environment supporting a range of distinctive floral species and providing food and shelter for small mammals, birds and invertebrates.”

In “Implications for LDF” for the second reference to EN1 under “South West Regional Planning Guidance (RPG10)” it is stated: “LDF needs to ensure that an area’s landscape/townscape character is protected and reflected in development proposals.” As I have stated above, this character includes the green spaces, and they should not be built on. The photographs below were taken **in Launceston**.

On on-screen page 147 of the SEA/SA, EN4 is cited as having an objective of “Improvements to the environment in cities, towns and villages. This should also recognise and maximise the positive contribution that trees, other planting and open spaces can make to urban areas in terms of their recreational, nature conservation and wider environmental and social benefits.”





The entry under “Implications for LDF” for this objective reads: “LDF should seek to protect green spaces recognising their importance not only in terms of visual amenity, but also in relation to health , informal and formal recreation, nature conservation, reflecting local distinctiveness, breaking built form and integrating visually the city as well as creating strong alternative routeways”.

These entries are consistent with my views, stated in this document, that green spaces in and around towns are important to local residents and to the character of the towns, and should not be built on. However, there is again a reference to cities. There are no cities in North Cornwall, and the inclusion of the word adds to my concern that the particular characteristics of North Cornwall may not have been fully addressed by the SEA/SA.

On the same page, EN5 is cited as having the objective to “Encourage new health and education facilities to be developed or redeveloped wherever possible on sites that are well served by public transport and accessible on foot or by cycle to ensure access for

patients, staff and visitors.” Under “Implications for LDF” it states: “Basic health services should be available within all local and district centres. There is likely to be a relatively high proportion of disadvantaged and mobility impaired groups that wish to access a hospital. Therefore accessibility by public transport is key.”

This is consistent with my statements above in connection with “Health & Well-Being” section of the regional plan or programme “A Sustainable Future for the South West: The Regional Sustainable Development Framework for the South West of England” except that the SEA/SA makes no mention of wheelchairs or scooters. In light of new legislation (the Disability Discrimination Act or DDA), and of the high proportion of older people in the district, I believe that there is much too little reference in documents relating to the LDF to the need to make services accessible to the disabled. Health facilities in particular need to have such access, for obvious reasons. The latest information on the DDA is at

<http://www.opsi.gov.uk/acts/acts2005/20050013.htm>

Perhaps the SEA/SA should include extracts from this legislation and relate them to implications for the LDF.

The third entry under “Implications for LDF” for “Regional Economic Strategy for the South West of England 2003-2012” states: “This needs to be balanced against ensuring that development does not conflict with communities needs and / or creates environmental damage.” I would be delighted if NCDC really did intend to ensure that development did not conflict with communities’ (*sic*) needs or create environmental damage, but elsewhere in the relevant documents the aim appears to be simply to **balance** development against communities’ needs and to **minimise** environmental damage.

Regarding “Action for Biodiversity in the South West 1997” (on-screen pages 147-8), the authors of the SEA/SA appear to have carried out only very perfunctory scrutiny, as the document refers specifically only to the section on urban landscapes, which is barely relevant to North Cornwall, where the only wards deemed urban are in Bodmin, as stated elsewhere in this submission. The SEA/SA also refers to “greenscapes” in relation to the “Action for Biodiversity in the South West 1997”, when the word used in the initiative is “greenspaces”.

A priority habitat identified in the “Action for Biodiversity in the South West 1997” is ancient and/or species-rich hedgerows, of which the district has many, such as the one which I have referred to and illustrated above. I would like to see the SEA/SA refer to the “Action for Biodiversity in the South West 1997” in more detail, perhaps looking especially at the priority habitats which are found in the district. The emphasis on urban settings, along with the two earlier references to cities, strengthens my concern that the SEA/SA has not taken the particular characteristics on the district fully into account.

“Action for Biodiversity in the South West 1997” is online at

<http://www.ukbap.org.uk/lbap.aspx?id=476>

I agree strongly with the objective in the “South West Regional Housing Forum (2002). South West Regional Housing Strategy 2002-2005” (commencing on on-screen page 148 of the SEA/SA): “Action point 6: Local authorities, in partnership with relevant stakeholders, including private landlords, need to draw up, implement and review strategies to bring empty residential properties back into use and, where available, to convert suitable non-residential properties for housing.”

I would add a requirement to investigate ways to bring second homes in the district into full use (see my Table 1 above for some stark statistics of the preponderance of these in some parts of the district, and also see second-home statistics near the beginning of this document).

Action point 13 of the “South West Regional Housing Forum (2002). South West Regional Housing Strategy 2002-2005” on page 149 reads: “...all rural authorities should complete specific assessments of rural housing needs based on parish housing needs surveys...” I trust that NCDC will ensure that all the necessary funding for these surveys will be provided, and hope that such surveys will be conducted in the towns as well as the villages and hamlets since, apart from Bodmin, no part of the district is urban (details and link given above).

Action point 17 on page 150 states: “Whilst clearly identifying requirement to meet local housing needs on exception sites, Local Development Plan cascade criteria should nonetheless be flexible enough to allow the allocation of homes to the wider local authority area as a last resort.” I find this hard to follow, in particular whether the whole action point relates to exception sites.

Action point 18 on page 150 states: “Local authorities should develop local policies and mechanisms to maximise the opportunities for affordable housing relating to agricultural and tied housing, and the conversion of rural buildings.” I trust that NCDC will be doing this, and believe that the requirement in the Draft Core Strategy for only 50% of new housing to be affordable is much too low.

I agree very strongly with Action point 21 (on-screen page 150 of the SEA/SA): “Use the potential for ending Council Tax discounts for second homes, and explore the potential for increasing this to the equivalent of a doubling of the rate.” If someone can afford to buy two homes, they should expect to have to compensate the community fully for the detriment of the home being unoccupied for much/most of the year.

Objectives of “ODPM (2003). Sustainable Communities in the South West – Building for the Future” (on-screen page 152 of SEA/SA) include: “We will use the planning system and other strategies to ensure that communities develop in a way which reduces the need to travel, particularly by private car.” I believe that this is best achieved by facilitating development identified as necessary by local communities, rather than by directing it, as detailed above.

I fully support the objective of “ODPM (2003). Sustainable Communities in the South West – Building for the Future” (on-screen pages 152-3 of SEA/SA): “We will develop in rural areas an increasing range of transport opportunities that reduce dependence on the private car, supporting initiatives such as the Cornwall Centre of Excellence in

rural transport and innovative schemes such as the Wiltshire Wiggly Bus and On Call buses in Plymouth and Caradon.”

On on-screen page 154 of the SEA/SA, an objective of “South West Tourism. Towards 2015 – Shaping Tomorrow’s Tourism, 2005” is given as “increasing concern for the environment resulting in more demand for destinations which preserve and promote their natural assets.” As acknowledged in the SEA/SA and the Draft Core Strategy, North Cornwall is just such a destination, and its natural assets must not be destroyed in a push for development or economic growth, or by speculative development which provides more dwellings than are needed, or can be afforded, by the resident population. Over-development of any kind will tend to drive away the kind of tourist who values the natural environment, and those who are attracted by luxury, extravagant, dedicated tourist facilities are less environmentally aware. Which kind of visitor does NCDC want?

I am pleased to see the criticism in “Implications for LDF” of the failure of “South West Tourism. Towards 2015 – Shaping Tomorrow’s Tourism, 2005” to mention impacts of climate change.

On on-screen page 155 of the SEA/SA, an objective of the “South West Regional Biodiversity Partnership (2004). South West Biodiversity Implementation Plan” is “sensitively managing existing habitats”.

In February 2005, a digger was driven through a rare piece of wet woodland in Launceston, disrupting watercourses and dumping in them branches of trees which were felled to facilitate its progress, in order to sink boreholes for a hydrological survey for the planned Kensey Link Road. This must be about as far removed from sensitive management as can be imagined, and I hope never to see such officially-sanctioned vandalism again. Photographs of this damage are online at

[http://www.vivienpomfrey.co.uk/kensey\\_valley2.htm](http://www.vivienpomfrey.co.uk/kensey_valley2.htm)

The Phase I Ecological Assessment for the Kensey Link Road stated of this piece of land in 2003:

“This type of habitat has been recognised as a nationally important habitat and also as a habitat of county importance. Wet woodland has been identified as a UK priority Biodiversity Action Plan (BAP) habitat and a plan for its conservation has been written (UKBG, 1998-1999). Likewise, at a county level this habitat type is included within the Wetland priority County BAP habitat and a plan for its conservation has also been written (CBI, 1997-1998)...It provides an area of semi-natural habitat within an urban and agricultural environment supporting a range of distinctive floral species and providing food and shelter for small mammals, birds and invertebrates.”

Another objective of the “South West Regional Biodiversity Partnership (2004). South West Biodiversity Implementation Plan” is “expanding and re-establishing links between fragmented sites”. As stated earlier, there are plans to destroy the aforementioned wet woodland to build the Kensey Link Road, instead of creating a link between it and another piece of such woodland to the east. Below is a photograph of the western edge of the latter woodland.



Another objective (on-screen page 156) is to “develop long-term sustainable approaches within the region that focus on the quality, extent and diversity of habitats.”

Under “Implications for LDF” for “Government Office for the South West (2003). Regional Renewable Energy Strategy for the South West of England 2003-2010” (on-screen page 156) there should perhaps be reference to investigating and implementing an appropriate **mix** of types of renewable energy generation which is locally appropriate and has minimal adverse impacts on the environment. Too often in the debate on renewables, both advocates and opponents focus on just one type of renewable energy technology, and estimate the potential contribution of that type alone, leaving an impression that renewables cannot meet our needs, which is not the case if all types were to be totalled. Perhaps the SEA/SA should also mention requirement for the incorporation of renewable generation in new buildings and during renovation, and the desirability of providing grants for domestic-scale renewable generation, as I have detailed above.

The same applies to “Government Office for the South West and the South West Regional Assembly (2004) REvision 2010: Empowering the Region – Renewable Energy Targets for the South West” (page 157).

In “Implications for LDF” for South West Regional Waste Strategy “Rubbish to Resources, 2004, I do not understand what is meant by “strive to minimise waste generation through the provision of adequate facilities”. Is it intended to mean “strive to minimise the quantity of waste which is not reused, repaired or recycled”? If so, clearer wording is needed. “Facilities” would appear to indicate processing waste rather than minimising its generation. If it is possible, I wonder whether the SEA/SA could identify ways in which waste generation can be minimised and reuse maximised. I believe that “carrot-and-stick” approaches can be highly successful: penalising individuals and organisations which generate too much waste and rewarding those who do not.

On pages 161-2, objectives for “Cornwall Structure Plan 2004 Policy 1 Principles of Sustainable Development” include

“Development should be compatible with:

- the conservation and enhancement of Cornwall's character and distinctiveness;
- the prudent use of resources and the conservation of natural and historic assets;
- the regeneration of towns and villages in meeting the needs of their population and surrounding area.”

All of these are most sustainably achieved by bringing empty and underused properties into full use, as I have detailed above. This retains the distinctive character of communities and enhances social cohesion, and infrastructure may already be present or able to be reinstated with minimal use of resources.

Another objective is “fostering the links between the environment and the economy”. This is in keeping with my recommendation for locally-appropriate work, such as renewable energy generation, forestry, rural crafts, etc.

I am pleased to see an objective (page 162) that employment should be rewarding, and that the prior reference to “well paid” presumably indicates that “rewarding” refers to rewards other than monetary ones. As I have stated above, it is not high wages that makes people want to live in North Cornwall, but aspects of quality of life which are not based on material wealth. I am also pleased to see the reference to “satisfactory housing” rather than an insistence on unnecessarily and unsustainably luxurious standards, which not all people want.

Policy 2 Character Areas, Design & Environmental Protection also states: “The quality, character, diversity and local distinctiveness of the natural and built environment of Cornwall will be protected and enhanced.” My comments on the previous policy also apply here.

I do not know what is meant by “understandable places” – is this a typo or just poor wording?

I agree extremely strongly with the objective in Policy 3 Use of Resources (pp. 162-3): “give priority to the re-use of previously developed land and buildings to meet development needs including, where appropriate, derelict land reclamation” and hope fervently that it will be adhered to assiduously. If it is, there will be no need for new-build.

I am heartened to see the objective to “facilitate...the utilisation of renewable energy sources” and wonder whether NCDC has policies in place to deliver this, such as grant aid for domestic-scale renewable generation.

Policy 4 Maritime Resources (on-screen pages 164) appears good. I would guess (and hope) that the luxury tourist development at Carlyon Bay would have been automatically rejected by Restormel Council under its stipulations.

According to <http://www.mevagissey.net/cbeach.htm>

“The Beach at Carlyon Bay in Cornwall, will include over 500 luxury apartments, designed by Tate St Ives architects Evans & Shalev, on one of Cornwall's best beaches in a £100m project which also includes leisure and retail facilities and boutique hotel.

Developers Ampersand offer "Live and Let" packages on apartments from £200,000 to £850,000 already selling off-plan.”

I hope that NCDC will never consider permitting such a scheme on its coastline. To allow the construction of 500 luxury holiday apartments when local people cannot afford a home is, in my view, obscene.

I am pleased to see that Policy 7 Renewable Energy Resources (on-screen pages 161-2) refers to “a range of technologies for renewable energy production (for heat and electricity)” and trust that NCDC will explore these thoroughly and be open to information on the various alternatives and sympathetic to all environmentally-friendly and socially-acceptable applications.

The SEA/SA recommends in “Implications for LDF” that “LDF will have to designate specific areas for renewable energy developments”, presumably in response to the policy objective: “Local plans should consider potential sites and locations for all forms of renewable energy development against these considerations and should establish clear criteria or appropriate locations for development to contribute to the Cornwall target.” This approach should not be allowed to be too prescriptive or proscriptive. Technology is continually developing, and the council must be open to allowing novel and low-impact renewable generation anywhere. For example, there are rooftop wind turbines which are no larger than satellite TV dishes, and micro-hydro should be considered in all locations with sufficient technical potential.

Re Policy 8 Housing (on-screen page 166), I do not know why the SEA/SA has concluded that “The LDF will have to allocate specific areas for housing developments to conform with targets set out by this policy.” If development occurs in response to local need, that need and local opinions should be allowed to determine the locations. There may be less opposition to applications for the smaller-scale development which would result from this approach, and there would generally be no opposition to renov-

ation and the bringing of underused properties into full use. This could reduce the council's workload, which would in turn benefit council tax payers.

Policy 9 Mix & Affordability of Housing states: "A mix of house type and tenure that meets the needs of the whole community will be encouraged." I agree with this, but I fear that it will not be achieved through allowing developers to determine the mix to the extent that is currently permitted. The needs of local communities are not the same as the needs of the developers, and I fear that the weaker side – the community – will lose out and have inappropriate mixes foisted upon them as in the past. I hope that NCDC will have the courage to take appropriate action to facilitate the provision of the **correct** mix of housing.

Policy 10 (pp. 166-7) contains several references to urban areas. In interpreting the policy, NCDC needs to take account of the fact that 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."

Policy 12 of the Cornwall Structure Plan 2004 (on-screen page 169 of the SEA/.SA) contains an apparently oxymoronic objective: "Land for employment should be retained, and sites in local plans should be reviewed for alternative uses where development for employment is no longer likely to be appropriate or feasible." It starts by saying that employment land should be retained and then appears to say that there are instances where it should not.

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.

Policy 15 Implementation, Monitoring & Review (on-screen page 170) has an objective that "Development should make best use of existing infrastructure". As I have stated elsewhere, this is best achieved by bringing empty and underused buildings back into full use, as infrastructure tends to be already in place or easily reinstated. Additional benefits include the revitalisation of communities, maintenance of local distinctiveness and no or minimal environmental damage.

The last sentence of this section, however, appears ambiguous: "Development should contribute to the provision of such infrastructure and services or mitigate any adverse effects arising, where it is necessary to enable the development to proceed." This could either mean:



1. Development should contribute to the provision of infrastructure and services...where **these** are necessary for the development to proceed, or be permitted to proceed, *or*
2. Development should contribute to the provision of infrastructure and services...if it is deemed to be necessary **that** the development proceeds.

I suspect that the first meaning is intended, but it is very unclear what even that would mean in practice, particularly as to who or what determines necessity. Does it relate to the fulfilment of planning conditions?

Policy 16 Overall Distribution of Development (on-screen pp. 170-171) has an objective that most development should not harm the character of towns. The Kensey Valley development has seriously harmed the character of the northern side of Launceston by destroying a green landscape of great value to local residents (fields and hedge depicted in photograph above). I trust that this kind of damage would not now be permitted.

The policy also 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. This is consistent with the ODPM document downloadable from

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

which states that **the only North Cornwall wards which are designated as urban are in Bodmin.**

Policy 16 continues: “The role and function of other main towns and local centres will be supported to meet the needs of their population and surrounding areas.”

I therefore trust that NCDC will adhere to this and not permit speculative construction which will fuel further in-migration.

Policy 25 Other Main Towns & Local Centres (on-screen pages 171-2) features the objective: “Employment provision should focus on the needs of the local area and on opportunities relating to local characteristics and distinctiveness.” I am strongly in accord with this and hope that NCDC will keep it in mind when making decisions on work-based planning applications.

Policy 26 Rural Areas (page 172) states: “Development should support the continued social and economic viability of rural areas.” I consider viability to be an ideal goal. Perhaps “economic viability” could be used to replace “economic growth” in parts of the LDF where it is more appropriate than “economic development”. It also repeats the requirement: “Employment provision should focus on the needs of the local area and on opportunities relating to local characteristics and distinctiveness” which I heartily endorse.

Policy 28 Accessibility (on-screen pages 173-4) states: “Appropriate accessibility assessments should be carried out for new and existing development allocations...” I trust that this will be done for the Kensey Valley housing estate in view of the threat to pedestrian and cycle access within and to and from the estate represented by the proposed Kensey Link Road, which would sever the estate in two with a busy road which would present a serious danger to children in particular, as pointed out in my document [Kensey Link Road critique](#) online at

[http://www.vivienpomfrey.co.uk/kensey\\_valley2.htm](http://www.vivienpomfrey.co.uk/kensey_valley2.htm)

A key objective of the “Waste Local Plan – Cornwall County Council” (on-screen page 174 of the SEA/SA) is “To provide for the recovery of Energy from Waste (EfW)”. I would like to see an undertaking in the LDF that this will take the form of less-polluting technologies such as anaerobic digestion rather than incineration. Anaerobic digestion also produces fertiliser, and the biogas produced can be used in a variety of ways, as I have detailed earlier. Another adverse impact of incineration is the destruction of materials which could be recycled, and it can thus represent a disincentive to genuine recycling.

Policy S1 of the “Waste Local Plan – Cornwall County Council” lists a primary aim as being “to seek the waste management technique which provides the most benefits with the least damage to the environment at acceptable cost in the long term as well as in the short term (the Best Practicable Environmental Option)” For organic waste, I believe that anaerobic digestion is a clear winner against such criteria.

Policy L1 of the “Waste Local Plan – Cornwall County Council” (on-screen page 175 of the SEA/SA) includes the principle/objective “maximising the recovery of usable heat, energy or materials”. Again, I believe that anaerobic digestion scores most highly in these regards.

Policy L5 of the “Waste Local Plan – Cornwall County Council” (on-screen page 177 of the SEA/SA) refers to composting. I believe that composting, other than on a domestic scale is a waste (*sic*) of an opportunity to produce renewable energy through anaerobic digestion, which also produces fertiliser. It therefore does not meet the criteria cited above for Policies S1 and L1, and I would like to see an undertaking in the LDF that NCDC will favour anaerobic digestion over composting wherever possible.

Policy L6 of the “Waste Local Plan – Cornwall County Council” (on-screen page 177 of the SEA/SA) potentially conflicts with the criteria cited above for Policies S1 and L1, as it appears to indicate that an application does not need to represent a scheme which “provides the most benefits with the least damage to the environment at acceptable cost in the long term as well as in the short term (the Best Practicable Environmental Option) or “maximising the recovery of usable heat, energy or materials”. It leads to a presumption that an application for an incinerator should be automatically permitted even when anaerobic digestion would be the best option under the criteria cited from S1 and L1. I therefore would like to see this anomaly redressed in the SEA/SA and the LDF, perhaps with a clause to the effect that the criteria cited above from Policies S1 and L1 must also be met in order an application to be approved. The entry under “Implications for LDF” is perhaps not sufficiently explicit in this regard.

One criterion of Policy L6 - that “the Plant is to be served by rail” – also militates against small-scale anaerobic digestion schemes in areas with no railway service (i.e. most of North Cornwall). The larger the scale of the plant, the further waste has to travel overall. As stated above, anaerobic digestion can be implemented on a wide range of scales. See, for example,

<http://www.wasteresearch.co.uk/ade/efw/anaerobic.htm>

Policy L6A (on-screen page 178) and L6B (pages 178-9) relate to visual impact and Policy E8 (page 182) relates to “adverse effects on the character of areas of open and undesignated countryside.” Whereas incinerators tend to create adverse visual impacts, anaerobic digesters can, if required, be built underground; for example, see

[http://www.eere.energy.gov/consumer/your\\_workplace/farms\\_ranches/index.cfm/mytopic=30004](http://www.eere.energy.gov/consumer/your_workplace/farms_ranches/index.cfm/mytopic=30004)

Policy E11 (page 183) relates to adverse effects on air quality. Again, I believe that anaerobic digestion is superior to incinerators in this regard.

Policy C1 (page 183) refers to preventing risk of pollution, emissions, visual impact and traffic. All these will be minimal with small-scale anaerobic digestion.

Section “China Clay in other areas” of Cornwall Minerals Local Plan (on-screen page 185) refers to China Clay Workings on Bodmin Moor, and under “Implications for LDF” is merely: “LDF should identify mineral resources and indicate through policies the conditions under which their foreclosure may be acceptable. The LDF should safeguard mineral resources as much as possible.”

According to

<http://www.aonb.org.uk/wba/naaonb/naaonbpreview.nsf/Web%20Default%20Frameset?OpenFrameSet&Frame=Main&Src=%2Fwba%2Fnaaonb%2Fnaaonbpreview.nsf%2F%24LU.WebHomePage%2F%24first!OpenDocument%26AutoFramed>

Bodmin Moor is designated an Area of Outstanding Natural Beauty (AONB).

According to

<http://www.aonb.org.uk/wba/naaonb/naaonbpreview.nsf/Web%20Default%20Frameset?OpenFrameSet&Frame=Main&Src=%2Fwba%2Fnaaonb%2Fnaaonbpreview.nsf%2F%24LU.WebHomePage%2F%24first!OpenDocument%26AutoFramed>

“Because of their fragile natural beauty the **primary purpose of AONB designation** is

- To conserve and enhance the natural beauty of the landscape

Two secondary aims complement the purpose

- To meet the need for quiet enjoyment of the countryside
- To have regard for the interests of those who live and work there.”

I have already been alarmed to see the damage done to the moor by new quarrying activity and wonder how this can be deemed to meet the above requirements. I urge NCDC to do all in its power to prevent further damage of this kind. I believe that the SEA/SA should refer here to the moor's protected status and the need to take this fully into account.

I think that there should be a comment under "Implications for LDF" for the section "Secondary Aggregates and Recyclable Materials" of Cornwall Minerals Local Plan on-screen page 186). The section reads:

“· The County has a vast resource of waste material, predominantly china clay waste but also including tin mining waste and construction and demolition rubble, potentially suitable for use as secondary aggregates.  
· The greater utilisation of these materials is being hindered because of the cost of processing and transporting the product to the market places in the South East and because of over-specification in the construction industry.”

Other policies cited in the SEA/SA relate to the reuse of construction materials, and I think that this should be mentioned here too in "Implications".

Cornwall's Local Agenda 21 Plan is one of the many documents which urges the retention of the distinctiveness of communities. I have referred to this issue elsewhere in this submission, including my fears that current development norms (i.e. the reliance on profit-driven developers) make this difficult or impossible to achieve.

The "Strong Communities" section of the Cornwall Community Strategy (on-screen pages 188-9) includes the objective to "Maintain safe communities and reduce the fear of crime". As I have stated elsewhere in this submission:

A more scattered development pattern might...reduce isolation and fear of crime.

A common cause of the actuality and perception of unsafeness is road traffic, so reducing this, and moving away from the "business-as-usual" practice of accommodating traffic by increasing road provision, are key to the provision of a safe environment. Less traffic leads to people feeling that they can walk and interact safely in their neighbourhoods, which in turn reduces crime and the fear of crime. This is pertinent to plans to convert the quiet road through the new Kensey Valley housing estate to a relief road (the "Kensey Link Road") which I have referred to in the [Kensey Link Road critique](#) online at

[http://www.vivienpomfrey.co.uk/kensey\\_valley2.htm](http://www.vivienpomfrey.co.uk/kensey_valley2.htm)

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 maximum use of buildings.

The "Quality Living Environment" section of the Cornwall Community Strategy (on-screen page 189) includes the objective:

#### “Use of Natural Resources

· Develop and demonstrate innovative and prudent use of natural resources”. This has the potential to enhance local distinctiveness, and also illustrates the inappropriateness of the term “minimisation of consumption of natural resources” which I have questioned elsewhere in this submission.

This section also has the objective: “Protect and enhance the natural, semi-natural habitats, landscape and their species”. I cannot see how this can be reconciled with 60% of new housing being constructed on greenfield sites. It supports the case for maximal use of empty and underused buildings before considering any newbuild.

The subsequent objective “Create conditions for sustainable economic sustainability” is an error copied from the Cornwall Community Strategy and should read “Create conditions for sustainable economic prosperity”!

Economic prosperity is much more conducive to sustainability than “economic growth” and could perhaps be used as an alternative to the term “economic development” which I also favour.

I was surprised that neither the extracts from the Cornwall Local Transport Plan, nor Implications for LDF of the plan (pp. 190-193), refer to the use of renewable vehicle fuels and technologies, especially for Aim 1 “To reduce the adverse impact of transport, in order to promote health, and protect and enhance the built and natural environment.” I have not had time to read the plan, and perhaps this is not part of its remit, but ought to be.

The objectives for Aim 2 “To improve safety for all” (page 190) would, if followed, militate against the construction of the Kensey Link Road and perhaps other proposed road schemes. From my own assessment of accident statistics, the Kensey Link Road would not reduce accidents on roads from which it is intended to take traffic. It is more likely to increase them elsewhere, as I have pointed out in the [Kensey Link Road critique](#) online at

[http://www.vivienpomfrey.co.uk/kensey\\_valley2.htm](http://www.vivienpomfrey.co.uk/kensey_valley2.htm)

“Unlike the currently-used mixed-residential and commercial St Thomas Road - which leads via Western Road to the main roundabout at Pennygillam - the completely residential new Kensey Valley housing estate has a number of public open spaces, the largest of which is immediately adjacent to the road. Unlinked, this road is relatively safe for children to cross and to cycle along: it is a residential road. If the road were linked to Newport Industrial Estate, changing it to a through-road, traffic would abruptly increase both in terms of volume and in terms of vehicle size and, if traffic-calming measures were inadequate, in terms of speed...

It would transfer noise, accidents and pollution from a mixed commercial and residential area to completely residential areas and quiet rural areas. It would perpetuate and exacerbate the Traffic Growth Circle in the Launceston area, making walking and cycling more difficult, dangerous, unhealthy and unpleasant. It would increase overall traffic levels and thus exacerbate global warming. Any benefits from

constructing this road would be greatly outweighed by this multitude of serious adverse effects.”

The Link Road plan also conflicts with plans to make Tavistock Road part of a cycle route, as Tavistock Road would also serve link road traffic.

Reducing traffic and traffic speed also encourages more walking and cycling and outdoor activity generally, which in turn reduces crime and the fear of crime.

Aim 3 (pp. 190-191) includes an objective to “reduce peripherally” which is presumably a typo and should read “reduce peripherality”. I do not subscribe to the belief that peripherality is a detriment. Remoteness maintains distinctiveness and is a characteristic which many residents and visitors value. It is neither necessary nor desirable to facilitate the large-scale, long-distance transportation of goods and people into and out of the district; this is in fact highly detrimental in terms of greenhouse gases, safety, quality of life and the economy, as it leads to relatively little money staying in the district. There are, I am pleased to see, a few tentative references to self-sufficiency in the documents cited in the SEA, and I hope that this is the way that NCDC will start to go. The district should be building on its unique characteristics, resources and skills and basing its economy on these, not increasing trade with other parts of the country and the world. Reducing goods traffic will ease congestion so that *necessary* traffic can flow freely, with the added benefit of making road building and widening unnecessary and reducing maintenance costs.

Objectives T5, T6 and T9 of the Cornwall Local Transport Plan 2001 – 2006 (on-screen page 192) militate against the construction of the Kensey Link Road in Launceston as it would make walking and cycling on the Kensey Valley housing estate and in Tavistock Road (planned to be part of a cycle route AND to take link road traffic) more dangerous and unpleasant. This may also apply to other road schemes.

I am rather surprised by Objective T7 of the Cornwall Local Transport Plan 2001 – 2006 (on-screen page 192), in that it only requires businesses with over 350 employees to adopt the concept of Travel Plans. North Cornwall has a large number of smaller businesses, and few with as many as 350 employees. I hope that NCDC will expand the Green Travel Plan requirement to smaller businesses, and encourage the smallest ones, for example adjacent businesses on industrial estates, to develop co-operative travel plans.

I am rather concerned over Objective T13 (on-screen page 193): “By 2011, to double the amount of general cargo carried by rail and sea, compared with 1997 levels.” Adherence to this could actually *increase* overall freight transportation and thus traffic-derived greenhouse gas emissions. What is needed is an overall reduction of freight transportation, which can be achieved partly by increasing the *proportion* of cargo carried by rail and sea, but there may be scope for a greater reduction through the localisation of procurement. I hope that NCDC will bear these points in mind, and I would have liked to see some reference in the “Implications for LDF” to this inappropriate wording.

Cornwall’s Bus Strategy 2001 – 2006 (Cornwall Local Transport Plan 2001 – 2006) has an objective to “support the integration of buses with other forms of transport, es-

pecially rural and community transport” (on-screen page 193). This highlights for me a possible problem regarding definitions, which also encompasses the term “public transport”. This seems to exclude, for example, demand-responsive services/taxibuses, but it is not clear whether or why this might be the case. In this section, rural transport appears to be regarded as separate/different from buses, but I cannot understand why. If there is an intention to integrate, it is necessary to have clear definitions of what is to be integrated.

“Delivering Cycling in Cornwall to 2011” (on-screen pages 194-5) includes objectives to:

“increase levels of cycling without a corresponding rise in cycle casualties through well designed facilities”, “address real and perceived concerns regarding cycle safety”, “develop safer, convenient, efficient and attractive cycle networks” *and* “encourage the development of a cycling culture in Cornwall”.

The Kensey Link Road scheme in Launceston includes plans to channel its through-traffic along Tavistock Road, which is also planned to form part of a cycle route. This is totally inimical to the objectives above, as it would create serious conflict between cyclists and heavy motor vehicle traffic. According to the 1997 “Transport Strategy for Launceston” another cycle route is planned to run alongside the River Kensey – on the flood plain! I trust that these plans will be drastically revised in order to meet the objectives above.

Strategy and Action – Achieving prosperity in Cornwall and the Isles of Scilly (Economic Development Plan) (2001) (on-screen page 195) includes a “vision” of “developing globally competitive new sectors” I would urge NCDC to limit sectors to those which do not involve long-distance transportation, in order not to jeopardise targets relating to the environment, including climate change. I would have liked to see this potential conflict mentioned in the SEA/SA.

I am pleased to see the entry “The Core Strategy and SA should consider the impacts of tourism on sustainability objectives” in “Implications for LDF” for “Cornwall Enterprise (2000) Cornwall Tourism Strategy. A 3D Vision – Delivering Distinctive Difference” (on-screen page 196). The objective to “Target promotions at appropriate High Spend segments, particularly from overseas” is decidedly unsustainable as it will encourage air travel, the fastest-growing source of greenhouse gas emission in the transport sector.

I am sure that many share my distaste for ghastly objectives such as “develop a Cornwall brand” and “integrating Cornish product brands”, and hope that NCDC will resist being drawn into the trend for “branding”. Cornwall is not a commodity. How “Cornish product brands” can or should be “integrated” eludes me.

I am also alarmed at the target “to attract at least a 2% faster tourism spend growth than national average.” The roads into Cornwall are already seriously congested during the tourist season. When living in Polyphant, I found that, following the local dualling of the A30, it became almost impossible to access the road during the tourist season due to the continuous traffic stream. The needs of residents must not be sacrificed in the drive to encourage tourism.

The entries for “Geodiversity Action Plan (GAP) for Cornwall and the Isles of Scilly. Consultation draft, December 2004” appear to relate to biodiversity rather than geodiversity. The final Geodiversity Action Plan for 2005 has now been published and does not contain the biological references listed in the SEA/SA, so perhaps this section is erroneous, as it appears to be a duplication of the entries for the Cornwall Biodiversity Initiative Project (BAP).

I am very concerned at the objective under “Objective One Partnership for Cornwall and Scilly (2000) Objective 1: Single Programming Document” (on-screen pages 198-9) “to create an additional 18,426 full time employment opportunities...”

According to <http://www.cornwall.gov.uk/index.cfm?articleid=10592>

the unemployment level in Cornwall in May 2005 was only 5,409 in May 2005.

Even in 2000, according to <http://www.cornwall.gov.uk/index.cfm?articleid=10651>

The figure was only 12,408.

So for whom are the extra jobs? I believe that the SEA/SA should make some comment on the statistics in relation to the target. It would be wrong to create an excessive number of jobs, leading to further in-migration.

Under “Implications for LDF” for “Young People’s Manifesto for Cornwall, 2005. The Voice for Young People in Cornwall, Cornwall Youth Forum, Truro, 2004” (on-screen page 199), a hyphen needs to be added to “Drop in health clinics”, viz. “Drop-in health clinics”. Otherwise it means that there is/has been/will be a fall in the numbers of such clinics!

I strongly support the entry under “Implications for LDF” for “Action Today for a Sustainable Tomorrow- The Energy Strategy for Cornwall, Cornwall Sustainable Energy Partnership, 2004”: “Increase small scale, low and zero carbon technologies integrated into building developments”. Please also see my comments above about the possibility of NCDC providing grant aid for domestic-scale renewable energy generation.

Another entry – “Become a demonstration sustainable community” – is very laudable and I hope that NCDC will genuinely strive towards such an ambitious goal. Examples of genuine sustainability can be found at

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

<http://www.hockerton.demon.co.uk/> *and*

<http://www.cat.org.uk/information/aboutcat.tmpl?init=1>

I am not familiar with the term “seapower” (two occurrences on page 200) and wonder whether a more understandable term should be used. I know of two types of renewable energy which use the sea: wave power and tidal power, and believe that



there may also be potential to use the thermal variation of the sea as an energy source. It appears that wave power is the type referred to in this “implication”.

Two more very-laudable but ambitious “implications” are “Ensure that most buildings achieve zero net carbon emissions” and “Ensure that most buildings reduce their demand on the grid through solar heating systems etc”.

I very much hope that NCDC really can achieve this. I would dearly love to have renewable energy generation for my home but cannot afford the outlay. Perhaps interest-free loans could be provided by the council.

I also fully support the “Implications for LDF”: “More local energy generation” and “Transport fuels from renewable sources such as energy crops will be widely available” and look forward to these being achieved.

I have reservations about the “implication” “Most new use of natural gas will be for CHP”. I do not support the installation of *any* new fossil-fuel power generation, and also consider the term “natural gas” unfortunate, as it is used to refer to fossil gas but not biogas, which is of course not only natural but also completely renewable.

There is a typo in the middle column of this section: “Provide the mechanisms that will eventually enable energy resident to have access to the basic energy services they need...” Should it read “...enable residents to have access...”, perhaps?

There is no date given for the North Cornwall Local Plan (starting on on-screen page 200).

The Environment Policies ENV 1-14 of the North Cornwall Local Plan (on-screen page 201) refers to “safe guarding trees and woodlands” (NB “safeguarding” should be a single word). See my comments above re the wet woodland threatened by the Kensey Link Road scheme.

I applaud the sense (if not the punctuation!) of the entry under “Implications for LDF” for Transport and Utilities Policies TRU 1-6 of the North Cornwall Plan: “These policies seem to lead towards the promotion and use of the car, the SEA could examine this further in the hope of developing a more sustainable alternative.”

The entry under “Implications for LDF” for the “Individual Wellbeing” section of the North Cornwall Community Strategy (2004 Objectives) (on-screen page 202) could perhaps be more detailed. I also feel that the objective to “Retain life choices” for younger people is inadequate and should be “Increase” or “Enhance” life choices, as I do not believe that they are currently satisfactory, and would like to see NCDC take a more ambitious stance here.

The objective to “Maintain safe communities and reduce the fear of crime” of the “Strong Communities” section of the North Cornwall Community Strategy (2004 Objectives) (on-screen page 203) is pertinent to comments which I have made elsewhere about the increased danger and fear of crime which results from excessive and excessively-fast motor vehicle traffic, especially when it passes through residential areas.

Again, the entry under “Implications for LDF” for this section seems inadequate, referring only to “Community facilities”.

The “Quality Living Environment” section of the North Cornwall Community Strategy (2004 Objectives) (on-screen page 203) includes the objective: “Develop and demonstrate innovative and prudent use of natural resources”. This has the potential to enhance local distinctiveness, and also illustrates the inappropriateness of the term “minimisation of consumption of natural resources” which I have questioned elsewhere in this submission.

Another objective here is to “Protect and celebrate heritage and the historic landscape”. I have referred elsewhere to the unacceptability of destroying green spaces in and around towns, as they are a vital part of the landscape. Also, the best way to avoid harm to, and actually enhance, historic landscapes is to bring existing empty and underused properties into full use rather than building new ones.

The next objective for this section is to “Protect and enhance the natural, semi natural habitats, landscapes and their species”. I have commented elsewhere on the apparent reluctance to implement such protection.

The typo in the Cornwall Community Strategy is repeated in the next objective: “Create conditions for sustainable economic sustainability”. See above.

The Marketing section of the North Cornwall Tourism Strategy (on-screen page 204) repeats the cringe-making concept “To develop the brand”, this time specifically in relation to North Cornwall”. See my comments about “branding” above.

Under “Implications for LDF” is the statement: “...tourism should be actively encouraged through the LDF, however this should not be at the expense of economic diversification..” As the document is an SEA/SA, I am disappointed to see no caveat regarding environmental sustainability here, especially in light of point 4 listed for the North Cornwall Tourism Strategy itself: “To utilise the principles and characteristics of sustainable tourism in the marketing of the District.”

The Seasonality section of the aforementioned strategy advocates marketing the district to overseas tourists. This is an example of diametric opposition to sustainability, especially with regard to global warming, and one of many which suggest that sustainability objectives are not taken seriously.

In the Quality section of the North Cornwall Tourism Strategy is the aim to “foster appropriate recognition of the contribution of tourism to ensure a sustainable welcome to visitors.” The idea of trying to “foster appropriate recognition” strikes me as arrogant and patronising. The job of councils, as with other levels of government, is to provide residents with what they need and value, not to try to impose a particular view on them. The term “sustainable welcome” appears meaningless and nebulous.

The tourism objective of “North Cornwall: An Environment for Growth (Economic Development Strategy)” (on-screen page 205) is to “To develop a distinct, positive North Cornwall identity for the visitor, industry and indigenous population particularly relevant to the quality tourism market.”

Again, this gives the impression that the whole district is to be packaged and advertised like a theme park, and I find this approach repellent. No one should be “developing an identity” for an area – identities already exist and are diverse and dynamic.

I don't understand the “team start” jargon in the “Enterprise support” section of “North Cornwall: An Environment for Growth (Economic Development Strategy)” (on-screen page 206).

North Cornwall Housing Strategy 2004 – 2007 includes the Strategic Objective SO1 – “Maximising the provision of new affordable housing in North Cornwall.” As I have stated elsewhere, this is unlikely to be achieved through the current system of using profit-driven developers, especially when the requirements made of them for providing affordable housing are so low. I am also concerned over the word “new” – does this exclude bringing empty and underused homes into full use? Newbuild should be a last resort, as is acknowledged elsewhere in the SEA/SA, and I am surprised to see no reference in this section to maximising the use of existing buildings.

North Cornwall Corporate Priorities and Vision has a somewhat unachievable vision on on-screen page 207 of the SEA/SA: “A vigorous local economy providing worthwhile jobs for all local residents”. This poor wording suggests that there is a plan to get babies and children into paid work and to drag pensioners out of retirement!

Another “vision” is “A special natural and build (presumably should be “built”) environment which is protected and sustained”, with which I thoroughly concur but which does not appear to be consistent with aims to build 2,340 new homes (60% of 3,900) on greenfield sites or to cut through open countryside with roads such as the Kensey Link Road in Launceston.

Other “visions”: “A cleaner, safe and healthy environment”. “Support and opportunities for disadvantaged people” and “Low levels of crime and anti social behaviour” require motor vehicle traffic reduction and the avoidance of channelling such traffic through residential areas and where they would conflict with cycle traffic, as I have stated elsewhere.

The Social Inclusion and Equal Access Strategy also aims to provide a “clean, safe and healthy environment” and has an objective “To reduce crime and anti-social behaviour and promote safer communities.” As I have stated earlier, a common cause of the actuality and perception of unsafeness is road traffic, so reducing this, and moving away from the “business-as-usual” practice of accommodating traffic by increasing road provision, are key to the provision of a safe environment. Less traffic leads to people feeling that they can walk and interact safely in their neighbourhoods, which in turn reduces crime and the fear of crime. This is pertinent to plans to convert the quiet road through the new Kensey Valley housing estate to a relief road (the “Kensey Link Road”) which I have referred to elsewhere in this document.

It is unclear why the SEA/SA lists the Draft Health Improvement and Modernisation Plan 2001/02 to 2004/06, North and East Cornwall NHS Primary Care Trust, 2004 on page 209, but does not give any detail.

Many of the aims of the North Cornwall Crime and Disorder Reduction Partnership Strategy 2002-2005, 2002, Cornwall County Council (on-screen pages 209-210 of the SEA/SA) will be more easily achieved if road traffic is reduced and heavy traffic is not channelled through residential areas, as stated above.

It is interesting to note in the section on this strategy that “a high proportion of crime in North Cornwall is related to tourism, deprivation and second homes”. Perhaps the “Implications for LDF” should refer to this, to the need to reduce the number of second homes and to the possible desirability of curbing tourism (which of course conflicts with policies to increase it).

There is a rather amusing typo under “Contaminated Land Inspection Strategy” on on-screen page 211: “Lassie and communicate effectively with all stakeholders”. Whilst I am all in favour of retraining surplus sheepdogs in the drive towards diversification, I suspect that “Lassie” should read “Liaise”!

English Nature are quoted on page 219 of the SEA/SA as saying:

“Chapter 5: Environment The district’s environmental assets are not restricted to designated areas. This should be recognised” and they add that these assets should not be “eroded”.

This does not appear to be consistent with aims to build 2,340 new homes (60% of 3,900) on greenfield sites or to cut through open countryside with roads such as the Kensey Link Road in Launceston, so I hope that following EN’s advice will mean that such activities will not continue.

English Nature are also quoted on this page as saying:

“Chapter 5: Climate change It should be recognised that climate change threatens much of our native biodiversity.”

The entry in the “Outcome” column for this advice is “No change required.” I disagree – see my comments on Chapter/Section 5 above.

Table 3 (on-screen page 222): I think that the word “affordable” at the beginning of the first “Comments” entry is superfluous. ALL housing needs to be designed in the way described, situated away from flood-risk areas, near public transport provision (demand-responsive or otherwise) and to meet the needs of local people.

As I have stated earlier, I disagree with the aim for “an average wage at least as high as the national average” and would prefer the term “close to the national average”. 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.

I would question the plus sign for this entry under “To develop a vibrant and sustainable economy”, in that high wages may be unsustainable in terms of resource use, inflation and income disparity,

I am pleased to note that this appears to be acknowledged in the “Comments” column where it says: “There are likely to be conflicts between environmental protection and encouraging economic growth”, and I hope that NCDC will show that it takes sustainability seriously rather than treating it as a little Green add-on, a practice which is all-too widespread.

I am also pleased to see the comment: “Care also needs to be taken to ensure that opportunities for training and employment support and meet the needs of local people and do not merely increase the disparities between the wealthy and the poor and encourage in migration.” The last phrase is pertinent to my concerns over the targets for job creation which I have referred to above and paraphrase below:

“Objective One Partnership for Cornwall and Scilly (2000) Objective 1: Single Programming Document” (on-screen pages 198-9) is “to create an additional 18,426 full time employment opportunities...”

According to <http://www.cornwall.gov.uk/index.cfm?articleid=10592>

the unemployment level in Cornwall in May 2005 was only 5,409 in May 2005.

Even in 2000, according to <http://www.cornwall.gov.uk/index.cfm?articleid=10651>

The figure was only 12,408. So for whom are these extra jobs?

I am pleased to see the statement on the same page that coast, countryside and heritage are what makes North Cornwall special and support the “comment” that development needs to be sensitively sited. I hope that NCDC does indeed intend to take this approach in future, and that my fears of continued degradation of the environment are unfounded.

On on-screen page 223, I believe that “A clean and safe environment which residents are proud of and where crime and anti social behaviour are tackled effectively” should be given a plus sign for the column “To reduce the District’s contribution to climate change”. This is because, as I have stated elsewhere, reductions in road traffic and speed encourage more walking, cycling and other outdoor activity, increasing safety and reducing crime and fear of crime; thus traffic reduction and traffic speed reduction, which reduce greenhouse gas emissions, should contribute to the creation of the type of environment referred to. This appears to be acknowledged to some extent in the “Comments” column.

Is the next entry incomplete? It ends with the word “and”.

**Table A4.1 (starting on on-screen page 226):**

This unfortunately has the inappropriate objective “To minimise the consumption of natural resources” as a column heading. I have commented on this and suggested alternatives elsewhere.

In the first column on page 226 there is reference to meeting the “diverse needs of the communities and business of the district” (through) “appropriate new development, consistent with identified housing and economic growth needs.” Like text elsewhere in the documents, this would appear to mean that ONLY development which is consistent with such needs will be sought and permitted. I hope that this is the case, as I do not consider that there is any justification for damaging the environment for speculative purposes. I am pleased to see the reference to regeneration and trust that this includes regenerating communities by bringing empty and underused properties into full use.

I am puzzled by the “Comments” for this section: “It is uncertain whether consideration will be given to the reduction in the Districts’ contribution to climate change, consumption of natural resources, reuse of buildings/brownfield sites and sustainable modes of transport through the siting of development.” Is this a reference to the three different options for locating development?

I am pleased, however, to read the “Comment”: “Proposals will need to seek to protect and enhance the natural, built and historic environment...” although I wonder how and whether this can be achieved under the current development system and construction methods. These methods are extremely energy-intensive and tend to follow a “scorched earth”-type procedure in which a large area of land is stripped of vegetation and flattened, even for the purpose of building a small number of homes, as I have witnessed occurring in preparation for two new houses near my home. Perhaps the council could examine the range of construction methods and require the least environmentally-damaging ones to be adopted.

The next entry on the same page refers to the inclusion of Launceston as a focus for growth, which I query, as does the SEA/SA in Clause 6.13. It is not classified as urban, and increased growth here would represent risk urbanising it.

In “Comments” for this section is the statement: “Concentrating development in towns will result in greater investment in employment opportunities, community infrastructure and facilities as well as environmental improvements to the town centre.” Is this based on any evidence? There is actually a question mark in the column for “to protect and enhance the natural and built environment and promote its positive contribution to North Cornwall’s present and future well being”, so there appears to be conflict here. There is further conflict where the “Comments” continue on the next page, stating: “However it is uncertain whether by concentrating development within such locations higher levels of air, water and noise pollution could result, greater pressure could be placed on adjacent Greenfield land as well as a higher demand for resources.” I believe that excessively-concentrated development does indeed put excessive strain on air and water resources and raise noise levels to unacceptable levels. Incidentally, I am not sure what is meant by “adjacent Greenfield land”. The worst pressure is created by actually building ON such land.

Some of the wording in “Comments” for the next section (on rural areas; on-screen pages 227-8) is grammatically incorrect in a way that gives it the opposite meaning to that which is intended. It should read: “Care needs to be taken to ensure that development does not impact on the road infrastructure, have negative impacts on adjacent land uses/communities or result in fluctuations in the availability of employment.”

Incidentally, the last requirement would appear to militate against tourism, which will always fluctuate between seasons.

On page 228, the section beginning “Incremental expansion of settlements” advocates “priority given to redevelopment on previously developed sites”. I wholeheartedly support this and trust that it infers that the first priority should be to bring existing buildings into full use, as this is the most sustainable approach by all standards: environmental, social, cultural, economic and with regard to the preservation of the distinctive character and heritage of the district.

I wonder how the council plans to “secure” “A closer relationship between housing and the availability of services and employment generating uses”. As I have stated elsewhere, this is best achieved by consulting local people and allowing, facilitating and controlling a more organic pattern of development rather than imposing, directing and micro-managing.

I do not understand why there is a question mark for this section in the “climate change” column. It appears to me that it would clearly have a positive effect if implemented – by curbing car journeys and reusing developed land and buildings. Here are some 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>

It may be that some previously-developed sites require decontamination and other forms of remediation, but I believe that the net effect on climate change would still be positive. This is reflected in the “Comments” column.

There is a worrying typo in “Comments”: “Positive effects of environmental erosion”!

Page 229: see my comments elsewhere about the term “well paid”. I wholeheartedly support the “Comment” about converting/reusing existing buildings.

I very much like the gist of the wording on page 230 (section starting: “Recognise the importance of the rural economy...”), including the reference to enabling (rather than

directing). I am not convinced that the rural economy needs to grow everywhere; in many areas there is plenty of wealth but it is unevenly distributed.

Page 231: I do not see why supporting and strengthening town centres' vitality and viability *per se* would minimise the consumption of natural resources (or, to use a preferred term, contribute to the sustainable use of natural resources), achieve and promote sustainable land use and built development or improve the environmental performance of the economy. It would depend largely on the nature of the development, such as construction materials (which would probably have to be transported some distance unless materials were re-used), energy-efficient design, energy use, the nature of goods sold, etc. Also, as has been stated elsewhere, concentrating facilities can actually increase travel (to and from the more-rural areas).

Page 232: I very much doubt whether the first point (commencing "Deliver housing provision consistent with..." would "protect and enhance the natural and built environment and promote its positive contribution to North Cornwall's present and future well being". With 60% of new dwellings being built on greenfield sites, and only 50% being "affordable", I would expect a negative effect, so that there should be a minus sign in this column. I also do not see how it would promote social inclusion, and would suggest a question mark or zero sign here at best.

There is **no way** that it would reduce the district's contribution to climate change – surely it is obvious that the effect will be at best neutral and more likely negative? Even if the Greenest construction methods and materials were used, we are talking about thousands of new buildings and increased in-migration, and more people means more resource consumption and more greenhouse gas emissions. There is also sure to be an increase in the consumption of natural resources, and this will probably be at unsustainable levels.

The second point on this page uses the odd term "sustainable locations" again. See my comments above, in particular those on Chapter/Section 5 of the SEA/SA. I am not aware of any evidence for the claim in "Comments" that "Concentrating development in existing town centres is the most sustainable option is the most sustainable option", and the second "Comment" somewhat contradicts the claim. There is, in any case, probably limited capacity for residential development in town centres, especially in light of the policy to increase retail provision there. I do support development in such places, however, where there is an identified local need, as elsewhere. Perhaps by "town centres" the authors mean "towns". As I have stated elsewhere, the towns in North Cornwall are significantly rural in nature, which would be realised if planners and associates were to look at the aerial views at <http://www.multimap.com/>

I regret that I have not been able to scrutinise the document further in the time available.

## COMMENTS ON OVERALL CONSULTATION PROCESS

The SEA/SA would have benefited from references to support claims made therein, some of which appear rather presumptuous and possibly baseless.



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...!