

Crantock Neighbourhood Development Plan

Submission Version 2015 – 2030

Report of Examination

February 2018

Undertaken for Cornwall Council with the support of Crantock Parish Council on the submission version of the plan.



Independent Examiner:

Liz Beth BA (Hons) MA Dip Design in the Built Environment MRTPI

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Summary

- I have undertaken the examination of the Crantock Neighbourhood Development Plan during February 2018 and detail the results of that examination in this report.
- Subject to the recommended modifications being made, the Plan meets the basic conditions and may proceed to referendum.
- I recommend the referendum boundary is the designated neighbourhood plan area.

Abbreviations used in the text of this report:

The Crantock Neighbourhood Development Plan is referred to as 'the Plan' or 'Crantock NDP'.

Crantock Parish Council is abbreviated to 'Crantock PC'.

Cornwall Council is also referred to as the 'LPA' (local planning authority).

The National Planning Policy Framework is abbreviated to 'NPPF'.

The National Planning Practice Guidance is abbreviated to 'NPPG'.

The Cornwall Local Plan Strategic Policies 2016 is abbreviated to 'Local Plan'

The designation of the Area of Great Landscape Value is abbreviated to 'AGLV'

Acknowledgements: Thanks to Local Authority staff and qualifying body volunteers for their assistance with this examination. My compliments to the local community volunteers and Crantock Parish Council, who have worked hard to produce a well-presented, locally relevant, Plan.

1. Introduction and Background

1.1 Neighbourhood Development Plans

1.1.1 The Localism Act 2011 empowers local communities to develop planning policy for their area by drawing up neighbourhood plans. For the first time, a community-led plan that is successful at referendum becomes part of the statutory development plan for their planning authority.

1.1.2 Giving communities greater control over planning policy in this way is intended to encourage positive planning for sustainable development. The National Planning Policy Framework (NPPF) states that:

“neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need”.

Further advice on the preparation of neighbourhood plans is contained in the Government’s Planning Practice Guidance (NPPG) website:

<http://planningguidance.planningportal.gov.uk/blog/guidance/neighbourhood-planning/>

1.1.3 Neighbourhood plans can only be prepared by a ‘qualifying body’, and in Crantock that is the Crantock Parish Council. Drawing up the Neighbourhood Plan was undertaken by a Neighbourhood Plan Steering Group, to terms of reference set by the Parish Council.

1.2 Independent Examination

1.2.1 Once Crantock PC had prepared their neighbourhood plan and consulted on it, they submitted it to the LPA. After publicising the plan with a further opportunity for comment, Cornwall Council were required to appoint an Independent Examiner, with the agreement of Crantock PC to that appointment.

1.2.2 I have been appointed to be the Independent Examiner for this plan. I am a chartered Town Planner with over thirty years of local authority and voluntary sector planning experience in development management, planning policy and project management. I have been working with communities for many years, and have recently concentrated on supporting groups producing neighbourhood plans. I have been appointed through the Neighbourhood Plan Independent Examiners Referral Service (NPIERS). I am independent of any local connections to Crantock and Cornwall Council, and have no conflict of interest that would exclude me from examining this plan.

1.2.3 As the Independent Examiner I am required to produce this report and recommend either:

- (a) That the neighbourhood plan is submitted to a referendum without changes; or
- (b) That modifications are made and that the modified neighbourhood plan is submitted to a referendum; or
- (c) That the neighbourhood plan does not proceed to a referendum on the basis that it does not meet the necessary legal requirements.

1.2.4 The legal requirements are firstly that the plan meets the 'Basic Conditions', which I consider in sections 3 and 4 below. The plan also needs to meet the following requirements under Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990:

- It has been prepared and submitted for examination by a qualifying body;
- It has been prepared for an area that has been properly designated by the Local Planning Authority;
- It specifies the period during which it has effect;
- It does not include provisions and policies for excluded development;
- It does not relate to land outside the designated neighbourhood area.

The Crantock NDP complies with the requirements of Paragraph 8(1). The Neighbourhood Area was designated on the 5th September 2014 by Cornwall Council. With the recommended modifications, the plan does not relate to land outside the designated Neighbourhood Area. It specifies the period during which it has effect as 2015 – 2030 and has been submitted and prepared by a qualifying body and people working to that qualifying body. It does not include policies about excluded development; effectively mineral and waste development or strategic infrastructure.

1.2.5 I made an unaccompanied site visit to Crantock to familiarise myself with the area and visit relevant sites and areas affected by the policies. This examination has been dealt with by written representations, as I did not consider a hearing necessary.

1.2.6 I am also required to consider whether the referendum boundary should be extended beyond the designated area, should the Plan proceed to a referendum. I make my recommendation on this in section 5 at the end of this report.

1.3 Planning Policy Context

1.3.1 The Development Plan for Crantock, not including documents relating to excluded mineral and waste development, is the Cornwall Local Plan, Strategic Policies 2010 – 2030 and locally relevant saved policies from the Restormel Local Plan 2001. In fact for Crantock Parish, the only saved policy of relevance is Policy 14: Areas of Great Landscape Value.

1.3.2 The National Planning Policy Framework (NPPF) sets out government planning policy for England, and the National Planning Practice Guidance (NPPG) website offers guidance on how this policy should be implemented.

1.3.3 During my examination of the Crantock NDP I have considered the following documents:

- National Planning Policy Framework (NPPF) 2012
- National Planning Practice Guidance (NPPG) 2014 and as updated
- Town and Country Planning Act 1990 (as amended)
- Planning and Compulsory Purchase Act 2004 (as amended)
- The Localism Act 2011
- The Neighbourhood Planning Regulations 2012 (as amended)
- Submission version of the Crantock Neighbourhood Development Plan (NDP)
- Evidence base for the Crantock NDP
- The Basic Conditions Statement submitted with the Crantock NDP
- The Consultation Statement submitted with the Crantock NDP
- The Strategic Environmental Assessment Screening Decision for the Crantock NDP
- Neighbourhood Area Designation (map)
- Cornwall Local Plan Strategic Policies 2010 – 2030: Adopted November 2016
- Strategic Housing Market Assessment 2010 and Affordable Housing DPD evidence base
- Representations received during the publicity period (reg16 consultation)
- Legal Judgement [2016] EWHC 2817 (Admin) RLT Build Environment Ltd and Cornwall Council: Case No: CO/2241/2016 10th November 2016

2. Plan Preparation and Consultation

2.1 Pre-submission Process and Consultation

2.1.1 Crantock is a village in Cornwall on the south bank of the estuary of the River Gannel, and separated by that river from the nearby town of Newquay. Much of the parish of Crantock was designated as an area of Great Landscape Value in the Restormel Local Plan, and the shoreline is included in the Newquay and Gannel Marine Conservation Zone.

2.1.2 A Steering Group was set up to lead on the Crantock NDP, comprised of residents and parish councillors. The group have reported on progress at the monthly Parish Council meeting, and in the monthly Parish Magazine. It was decided to produce a focussed Plan, concentrating on the issues of most concern to the community, as revealed in the consultation.

2.1.3 The Consultation Statement sets out the nature and form of consultation prior to the formal Reg14 six week consultation. An initial survey and consultation day informed the drawing up of the vision and objectives, and confirmed that the community did want to progress a neighbourhood development plan. Another survey was undertaken to check the proposed draft policy areas, and a 2 day consultation presented draft policies for comment prior to the formal six week consultation.

2.1.4 As required by regulation 14 of the Neighbourhood Planning Regulations 2012, the formal consultation for six weeks on the pre-submission Crantock Draft NDP ran from the 19th August to the 2nd October 2017. Cornwall Council are satisfied that all statutory consultees were consulted at this stage. The draft Crantock NDP was circulated with the Parish Newsletter, and available online. Appendices to the Consultation Statement detail comments received during the consultation, and also alterations made to the Plan as a result of them. I am satisfied that due process has been followed during the consultation undertaken on the Plan.

2.2 Submission of the Plan and Regulation 16 Consultation

2.2.1 As required, the amended Plan, together with a Basic Conditions Statement, a Consultation Statement, the Screening Opinion and a plan showing the neighbourhood area was submitted to the LPA after the Reg14 consultation had been completed and comments considered.

2.2.2 Cornwall Council undertook the Reg 16 consultation and publicity on the Crantock NDP, starting on the 23rd November 2017 and ending on the 11th January 2018. Fourteen representations were received during this consultation, seven of which noted receipt but made no comment. Objections to several of the policies were received from Stephens Scown as agents for Kingsley Real Estate Ltd, and these are considered where relevant in the discussion on the Plan's policies in section 4 below.

2.2.3 The Affordable Housing Service of Cornwall Council referred to comments made at the Reg14 stage, and also relevant are comments made by the Water Authority, South West Water during this earlier statutory consultation. Other comment did not directly impact on my task here, which is to consider whether or not the Plan meets the Basic Conditions. The point of accuracy mentioned by Natural England has been picked up below for clarity.

3. Compliance with the Basic Conditions.

3.1 General legislative requirements of the 1990 Town and Country Planning Act (TCPA) other than the Basic Conditions are set out in paragraph 1.2.4 above. The same section of this report considers that the Crantock NDP has complied with these requirements. What this examination must now consider is whether the Plan complies with the Basic Conditions, which state it must:

- Have regard to national policies and advice contained in guidance issued by the Secretary of State;
- Contribute to the achievement of sustainable development;
- Be in general conformity with the strategic policies of the development plan for the area; and
- Be compatible with and not breach European Union (EU) obligations and human rights law.

3.2 The Basic Conditions Statement explains in detail how the plan promotes the social, economic and environmental goals of sustainable development, as defined in the NPPF. The Plan has been criticised as not being positive enough and therefore not promoting sustainable development, and certain policies are criticised as not meeting the Basic Conditions in this regard. Discussion in section 4 deals with particular criticisms, but protection policies are generally justified by the evidence and not contrary to national and local policy. Promotion of tourism as an economic good is linked to protection of the environmental assets including landscape. Social goals are linked to providing affordable housing and housing available for primary occupancy. With the modifications to policy recommended below, I accept that the Crantock NDP does promote sustainable development.

3.3 A screening opinion has been issued by Cornwall Council which considers whether Strategic Environmental Assessment (SEA) and Habitat Regulations Assessment (HRA) are required for the Crantock NDP. These environmental requirements in EU law are the main EU Directives that neighbourhood plans need to comply with. The Screening opinion states that:

“Based on the scale and location of development proposed, Cornwall council is of the opinion that the Crantock NDP is unlikely to have significant effects on the environment or on European Sites and that SEA and HRA is therefore not required. This view is confirmed by the consultation bodies.”

Thus EU directives relevant to the Crantock NDP have been complied with and the Basic Conditions with regard to this met.

3.4 The Crantock NDP in my view complies with Human Rights Legislation, in that a clear planning case for policies that could potentially impact on individual rights are justified by evidence of social harm and planning relevance of the issues the policies address. Whether or not a policy such as Policy H3 with a principal residency requirement could affect human rights was considered in a legal judgement on a similar policy in the St Ives NDP {[2016] EWHC 2817 (Admin)}. The Judgement quotes the LPA, which for St Ives is also Cornwall Council, as stating that in their view Article 8 of the ECHR was not breached by the primary occupancy policy in that NDP. The Judgement goes on to consider the point under Ground 3 of the challenge (paras 72 – 114), and concludes that the policy was compatible with Article 8.

3.5 The Basic Conditions Statement submitted with the Crantock NDP considers the equalities impact of the Plan and states that failing to provide sufficient appropriate housing will impact most on disadvantaged groups.

4. Compliance with National Policy and the adopted Development Plan

4.1 The final and most complex aspect of the Basic Conditions to consider is whether the Crantock NDP meets the regulatory requirements as regards national policy and the development plan. This means firstly that the Plan must have regard to national policy and guidance, which for this neighbourhood plan is the NPPF and the NPPG. Secondly the Plan must be in general conformity with the strategic policies of the development plan. The phrase ‘general conformity’ allows for some flexibility. If I determine that the Plan as submitted does not comply with the Basic Conditions, I may recommend modifications that would rectify the non-compliance.

4.2 The Plan and its policies are considered below in terms of whether they comply with the Basic Conditions as regards national policy and the development plan. If not, then modifications required to bring the plan into conformity are recommended. Modifications are boxed in the text, with text to remain *in italics*, new text highlighted **in Bold** and text to be deleted shown but ~~struck through~~.

4.3 The Crantock NDP is a concise document with a total of seven policies. A decision to concentrate on those issues felt to be priorities locally is stated in the Consultation Statement. This is a decision completely in accord with the right of any qualifying body to determine what issues they wish their neighbourhood plan to engage with. [NPPG ID41-040-20160211]. During this examination I have needed to clarify references to evidence available, and this will entail the alterations for clarity to the structure and evidence base of the plan recommended in Modification 1, in order that the Plan meets the Basic Conditions and requirements of the NPPG [same reference]. The evidence collected by the qualifying body is extensive and very useful, but it does need to be available online.

Modification 1: I recommend that for accuracy and clarity the reference on page 38 to the evidence base being available via a private email address is deleted. The list of evidence available on page 39 should provide a hyperlink connection to each one. The Views and Vistas evidence should be provided as an Appendix to the Plan, at least as far as the map indicating key views and vistas, due to its reference in Policy PV1.

4.4 **Policy H1 Settlement Boundary:** This policy takes the previous settlement boundary defined in the adopted Restormel Local Plan (LP) and reviews it with regard to recent planning permissions and development built outside of the previous development envelope (the term used for the development boundary in the Restormel LP). The policy defining development permitted within

and outside the development envelope (Policy 3 in the Restormal LP) has been superseded, but the Cornwall LP states that settlements should have definable boundaries, and that Neighbourhood Plans can provide detailed definition on settlement boundaries (para 1.68).

4.4.1 Crantock Parish is not identified in Policy 3 of the Cornwall LP for the delivery of housing, employment and other new development. The Housing Target issued to the qualifying body states that the parish has no further allocation to find in order to be in conformity with Cornwall's Local Plan. Thus a settlement boundary policy that encourages infill within it, is in conformity with the Local Plan and promotes sustainable development. The Plan is positive with regard to development felt to be in keeping with the village and within the defined boundary.

4.4.2 The third paragraph of Policy H1 has been criticised as being a blanket restriction on any development, and therefore not positive planning. As written it would apply to any development including small-scale extensions of rural businesses for example. Affordable housing outside the development boundary is only considered acceptable as an exception site if it is adjacent to the built up area, and this paragraph is also not clear on this point. The intent of the policy is to restrict residential development outside of the settlement boundary, which is in conformity with Policy 7 of the Local Plan. Development outside the settlement boundary will also need to respect policies protecting the landscape value of the parish, including the defined AGLV, and I recommend that in order to be in general conformity with the development plan, and thus the Basic Conditions, the third paragraph of this policy is revised as shown in modification 2.

4.4.3 Policy H1 refers to Map 1 in the NDP, which shows four areas of probable new built up areas. In fact this map needs to be updated to reflect what is now on the ground. The infill build off Green Lane and the Tara Vale development are now built, and the settlement boundary should be shown as a continuous line around these sites. The provisional boundary definition for Pentire Green and Halwyn road are correct as shown. For clarity and consistency as required by the NPPG [NPPG ID41-041-20140306] I recommend this change to map 1 and the definition of the settlement boundary.

Modification 2: The final paragraph of Policy H1 is recommended to read as follows:

Development outside the boundary will only be acceptable if it complies with Policy 7 in the Cornwall Local Plan 2015-2030 and other policy in the development plan. ~~to deliver a clearly identified local need for affordable housing in accordance with Policy H2.~~

Map 1 is recommended to show a solid defining settlement boundary line around the site off Green Lane and the Tara Vale development, as these proposals have now been built.

4.5 Policy H2 Affordable Housing: The policy has been criticised for being negative, repeating Local Plan Policy and not in conformity with strategic policy, and thus being contrary to the Basic Conditions. Within reason I do not consider repetition a Basic Conditions issue, the policy has included some locally specific detail and as a general principle, repeating some of the terms of higher level policy can make the document easier for people to use and understand. However the policy has used wording that would more properly be included in the justification text due to its implied pre-judging of planning applications, and implication that any future planning application would effectively be determined by the affordable housing team.

4.5.1 In order that Policy H2 meets the Basic Conditions in terms of the clarity required by the NPPG and NPPF (para 154) and respects due process of decision-making I recommend it is modified as shown in modification 3:

Modification 3: Policy H2 is recommended to be altered as follows:

Current indications are that local affordable housing needs are likely to have been met in the lifetime of this plan, but any proposals for housing development must meet the affordable housing requirements of Policies 8 and 9 in the Cornwall Local plan 2015-2030 and this policy.
~~need at the time. For the period 2015 to 2030 that need has been met, subject to reviews by the Affordable Housing Team, by the current applications at Pentire Green and Halwyn Road sites.~~
Applications must demonstrate the following:

- 1. A tenure target of 70% affordable rented homes and 30% intermediate housing for sale or rent will be sought unless current evidence suggests this should change;*
- 2. The type and size mix of affordable dwellings must reflect identified local needs as evidenced through the Cornwall housing register current at the time or any specific local surveys;*
- 3. Affordable homes should not be readily differentiated from the open market homes by their design, quality, location and distribution within a site;*
- 4. The dwellings will be occupied by people with a local connection in housing need in accordance with Cornwall Council's ~~standard definitions~~ in the Cornwall Homechoice Scheme v1.6 June 2016 (para 4.4 ff) or any future Council document updating this definition and housing policy.*
- 5. All development proposals should consider the need to design out crime, disorder and anti-social behaviour to ensure ongoing community safety and cohesion.*

~~No further development, other than the two schemes (Pentire Green Full Planning Permission and Halwyn Road currently Outline Permission only), will be supported in the period 2015 to 2030 unless the affordable housing team advises that an increased need requires more housing.~~

4.6 Policy H3 – Principal Residence Requirement: The human rights implications of this policy have been discussed in para 3.4 of this report. The policy has been criticised during the Reg16 consultation as not complying with the Basic Conditions by being negative and not promoting sustainable development. Indirect impacts of being an effective brake on future residential development, and therefore the provision of linked affordable housing, justify this statement, and there is a claim that the evidence is not robust because possible future impacts of the policy have not been assessed.

4.6.1 The direct impact of the policy can be predicted to result in future housing provision allowing more dwellings to be available to people using them as a primary residence within the community. Indirect market-led responses may need to be monitored, but cannot be assumed. Land values may adjust to the new policy environment in time. There are acknowledged social harms arising from high levels of second home ownership and holiday lets in small communities. Support for local facilities declines, which can weaken communities and effect economic well-being. The NPPF states that the planning system can play an important role in creating healthy communities (para 69), and in situations where the evidence shows high levels of second home ownership (and the often linked phenomena of residential properties used for holiday lettings) such a policy can be justified by the social need for principle residency dwellings.

4.6.2 The evidence of levels of second home ownership and holiday lettings in the parish of Crantock is acknowledged by the LPA, and the Parish Council have collated their own extensive evidence on this issue. I accept that the evidence presented has made the case for this Policy and that it complies with the Basic Conditions.

4.7 Policy I1 infrastructure – Sewerage: This policy has been criticised in comments received during the Reg16 consultation for not being reasonable and holding development up until a third party takes action. The policy has been redrafted after comment received from the Water Authority during the Reg14 stage, and this has led to the policy seeming to contradict itself in terms of whether or not connection to the public foul sewerage network is acceptable, a further objection at the Reg16 stage to the policy.

4.7.1 The response from South West Water during the Reg14 stage was that they would ensure no further developments are supported until such time as formal capacity checks have been

undertaken and any improvements required secured. Attention was drawn to this response in their comments during the Reg 16 consultation, and they did not object to the re-drafted policy. A rather exceptional situation with the Water Company exists at present therefore, whereby they have concerns about the capacity of their system and do not recommend further development links into it until any necessary improvements have been made. The Crantock NDP offers plenty of evidence of contaminated flooding events happening very regularly, and the recent declaration of a Marine Conservation Zone that includes the River Gannel estuary within the neighbourhood plan area provides further justification for ensuring sewerage pollution into this sensitive water environment is prevented.

4.7.2 The NPPG offers guidance on waste water infrastructure and planning policy, and states that the LPA needs to have regard to the EU Water Framework Directive. A lack of adequate infrastructure is given as a potential significant planning concern at the planning application stage, and the role of an LPA in ensuring that new development and infrastructure is aligned is accepted (ID: 34-019-20140306). It is also accepted that in some circumstances a neighbourhood plan may need to deal with water issues (ID: 34-015-20140306). Given the clear response of the Water Authority as regards the need to assess the capacity of the current system before any further load is placed onto the public sewerage system in Crantock, I accept that given the local circumstances the Crantock NDP is justified by the evidence to address the issue in the way it has.

4.7.3 The policy needs however to be internally consistent in order to have the clarity required by the NPPG, and be specific that it is the public sewerage system that is affected. I therefore recommend that Policy I1 is amended as shown in Modification 4 in order that it complies with the Basic Conditions.

Modification 4: Policy I1 is recommended to be deleted and substituted with the following text:

Due to the current identified problems of pollution incidents in the neighbourhood plan area and the sensitive marine environment, no further developments linking to the public foul water waste system will be supported until such time as formal capacity checks have been undertaken and any improvements required secured.

4.8 Policy I2 Traffic and Pedestrian Safety: This policy complies with the Basic Conditions.

4.9 Policy PV1 Panoramas, Vistas and Views Policy: this policy is protecting an important aspect of exceptional landscapes, the enjoyment of views of it by the public, either as visitors or residents. However it is muddled in terms of the evidence referred to as a support and reference for the policy. The 'designated areas' referred to in the first paragraph are not clear, enquiry revealed the policy to be referring to the AGLV, the AGHV and the AGSV shown on maps on pages 32-33. Only the first is a designation recognised by existing adopted policy, and historic and scientific value is less of an indicator of important landscape beauty and views and vistas than an AGLV. The evidence base mentioned in Modification 1 above is a good piece of work, but as it is referenced in the policy it needs to be clearly available. At least the plan showing the identified key views should be attached to the Plan, the whole Annex with pictures would ideally be attached. As the LLCA is not a coherent document reference to it should be deleted.

4.9.1 The AGLV Plan on page 32 show the designation beyond the boundary of the neighbourhood area. As reference to the AGLV area is explicit within the modified policy, the map of the AGLV should make clear the AGLV within the parish and thus the designated neighbourhood area that Policy PV1 applies to. The Crantock NDP can only deal with land in the designated neighbourhood area. The satellite image of landscape features on page 35 should also show the parish boundary, as Porth Joke Beach is not in the area, and the Porth Joke valley is only partially in the designated neighbourhood area.

4.9.2 The wording of the policy is misleading and not clear: supporting all development that has no significant negative impact on important views is not consistent with policy H1 of this plan. In order that the Policy and justification comply with the Basic Conditions in terms of clarity of meaning I recommend the policy is altered as shown in Modification 5. This modification also deals with the need for the Plan to only apply to land within the designated neighbourhood area.

Modification 5: Policy PV1 and evidence referenced to be altered to read as follows in order that it complies with the Basic Conditions:

Due to the topography and historic development of Crantock there are important panoramas, vistas and views within the locality, ~~or~~ and views to and from the village that contribute to its special character and quality of coast, countryside and dunes areas. Development should not compromise the panoramas, vistas and views ~~and designated areas summarized above~~ shown in Annex A or important public views and vistas within the Area of Great Landscape Value (AGLV).

~~Development proposals will be supported where it can be demonstrated that there will be no significant negative impact on any important public panoramas, vistas and views. Developers submitting proposals which fall into the area identified in Annex A~~ **within the AGLV should submit a Landscape Visual Impact Assessment (LVIA) identifying the impact on public views and vistas that their proposed development would have.**

The AGLV has unique character and features ~~as detailed in the LLCA.~~ and any development must retain and strengthen ~~it is vital that~~ the character and features of this important landscape ~~are retained and strengthened.~~

Annex A: Panoramas, Vistas and Views Policy – PV1 to be attached to the Crantock NDP

The plan of the AGLV on page 32 to make it clear which part of the designation applies to the designated neighbourhood area (the parish of Crantock) by showing the boundary and stating the fact that this is the only relevant part of the designation for the purposes of this Plan and Policy PV1.
The satellite image identifying local landscape features to show the parish boundary.

4.10 Policy AL1 Agricultural Land Policy: The policy is protecting higher quality agricultural land, something that the NPPF (para 112) and the Cornwall Local Plan (Policy 21) both support. The policy has the necessary caveats to allow development where the balance of competing planning factors suggests other considerations should allow development. The policy complies with the Basic Conditions.

Modification 6: For clarity of meaning I recommend that the error noted by Natural England with regard to the need for consistent reference to the “Marine Conservation Zone” on page 33 is corrected.

5. The Referendum Boundary

5.1 The Crantock Neighbourhood Development Plan has no policy or proposals that have a significant enough impact beyond the designated Neighbourhood Plan Boundary that would require the referendum boundary to extend beyond the Plan boundary. Therefore I recommend that the boundary for the purposes of any future referendum on the Crantock NDP 2015 – 2030 shall be the boundary of the designated Neighbourhood Area for the Plan.