

**Exploring the interface between the emerging Cornwall Local
Plan – Strategic Policies (Proposed Submission) and the Hayle
Neighbourhood Plan (Local Policies)**

DRAFT

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To be completed following consideration of the draft by the steering group.

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Executive Summary

To be completed following consideration of the draft by the steering group.

Introduction

This report explores two key issues which need to be considered during the preparation of the neighbourhood plan:

1. identifying which policy and development issues are considered to be 'strategic' in nature and therefore are most appropriately dealt with by Cornwall Council through the Local Plan and Development Plan Document processes and which are considered to be 'local' in nature and therefore more appropriately dealt with through the neighbourhood plan; and,
2. testing the degree to which current 'saved' policies from the Penwith Local Plan, which are proposed to be replaced by the emerging Local Plan (when adopted) are 'fit for purpose' in terms of transfer to the neighbourhood plan.

The report sits alongside the 'Evidence Base' report and builds on the recommendations made in the 'Considering Development Potential and Options for Allocating Development Sites in Hayle' report.

Part 1

Identifying the 'Strategic' Elements of the Development Plan

Context

The Government's planning policy and guidance contained in the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG) make it clear that neighbourhood plans play a key role in defining local planning policies. Neighbourhood Plans do this within the context of being part of the statutory development plan for an area alongside the local authority's Local Plan, which focuses (but does not have to be restricted to) 'strategic' policies. In Cornwall, the emerging Local Plan is defined as comprising solely of strategic policies.

Government policy also makes it clear that neighbourhood plans must be in general conformity with the strategic policies contained within an adopted Local Plan.

"Neighbourhood planning provides a powerful set of tools for local people to ensure that they get the right types of development for their community. The ambition of the neighbourhood should be aligned with the strategic needs and priorities of the wider local area. Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan. To facilitate this, local planning authorities should set out clearly their strategic policies for the area and ensure that an up-to-date Local Plan is in place as quickly as possible. Neighbourhood plans should reflect these policies and neighbourhoods should plan positively to support them. Neighbourhood plans and orders should not promote less development than set out in the Local Plan or undermine its strategic policies." (Paragraph 184, NPPF¹)

The Site Allocations Development Plan Document (DPD) which is proposed to be produced by Cornwall Council will deal with site specific allocations unless neighbourhood plans are the preferred mechanism through which to do this. In essence, these allocations could be dealt with through the Local Plan / Allocations DPD or the neighbourhood plan, although any allocations deemed as being 'strategic' in scale or nature (which could mean that they are critical to ensure delivery of the overall scale of development in Cornwall) would have to be dealt with through the local authority processes. Figure 1 captures these relationships.

¹ See http://planningguidance.planningportal.gov.uk/blog/policy/achieving-sustainable-development/plan-making/#paragraph_184

Figure 1 – Relationship between national, strategic and local planning policy



Defining 'Strategic' Issues

The options with regard to which route to take to allocate housing and other development (such as employment land) in Hayle have been explored and recommendations made in an earlier report 'Considering Development Potential and Options for Allocating Development Sites in Hayle'. That report recommended that the most expedient and resource effective way to deal with the allocation of development sites in Hayle will be to continue to progress these allocations through the Cornwall Council Site Allocations DPD process and to influence that process by utilising the results of community engagement and evidence gathering undertaken for the neighbourhood plan. This is also true of the Harbour regeneration with implementation of the masterplan now underway.

With this in mind, there are a number of other planning issues and projects which could be considered as strategic in nature and which therefore should be considered as being more appropriately dealt with through the continuation of work already underway and being led by Cornwall Council (through its role as local planning, transport and highways authority) and in partnership with other agencies. These are, principally, infrastructure requirements essential to enable and support growth and change proposed in the emerging Local Plan and previously identified in earlier plans and strategies. As with the identification of housing allocations, significant work has been done already to get to a position of understanding the infrastructure needs and requirements in Hayle. These are captured in the Hayle and St Ives Community Network Area Infrastructure Needs Assessment (INA) (reviewed in the 'Evidence Base' and 'Considering Development Potential and Options for Allocating Development Sites in Hayle' reports), many of which are considered as being of strategic importance².

In the interests of expediency, continuity and practical delivery, it is recommended that the infrastructure schemes identified in the INA as 'committed' and 'required', and future strategic infrastructure identified in connection with growth in and around Hayle, remain the

² The INA can be seen via the following link - <http://www.futurecornwall.org.uk/idoc.ashx?docid=be0341e1-799d-4471-b6c1-35d935471b90&version=-1>

responsibility of Cornwall Council and its strategic delivery partners such as Government agencies. There are also 'other projects' identified, many of which it is understood are already supported by the Town Council (and where the Town Council is listed as a delivery partner), which should remain programmed through the INA. The neighbourhood plan will need to be cognisant of these identified infrastructure projects and acknowledge their delivery through existing mechanisms.

Part 2

Testing the 'Fitness for Purpose' of the Penwith Local Plan 2004 Saved Policies in the Context of Potential Transfer to the Hayle Neighbourhood Plan

Context

The purpose of Part 2 of this report is to assess whether any of the current 'saved' policies from the Penwith Local Plan 2004, which are due to be replaced by the policies in the Cornwall Local Plan when adopted, can be used or transferred to the Hayle Neighbourhood Plan.

As a part of the statutory development plan for the area, the neighbourhood plan has to be set within the context of policies set out in the rest of the development plan (i.e. the current adopted Core Strategy or Local Plan and relevant Development Plan Documents) and of those set out in the National Planning Policy Framework (NPPF) and accompanying National Planning Practice Guidance (NPPG). It also needs to take into account the policies of the emerging Local Plan as evidence and up-to-date strategic context.

As a result of the planning system going through significant changes in recent years in terms of the statutory planning documents that need to be produced (including those produced by the local planning authority) and with change from a two-tier (District Council and County Council) system to one of a single Unitary Council in Cornwall in 2009, formally, the 'development plan' policies for the Hayle area are those which have been 'saved' and which were part of former District Council planning policy (in the Penwith Adopted Local Plan 2004³) prior to (the single) Cornwall Council being formed⁴. The Local Plan was 'saved' in 2004 as a result of the Planning and Compulsory Purchase Act 2004, which introduced the requirement for Local Plans to be replaced by Local Development Frameworks (the main planning document of the Framework being the Core Strategy).

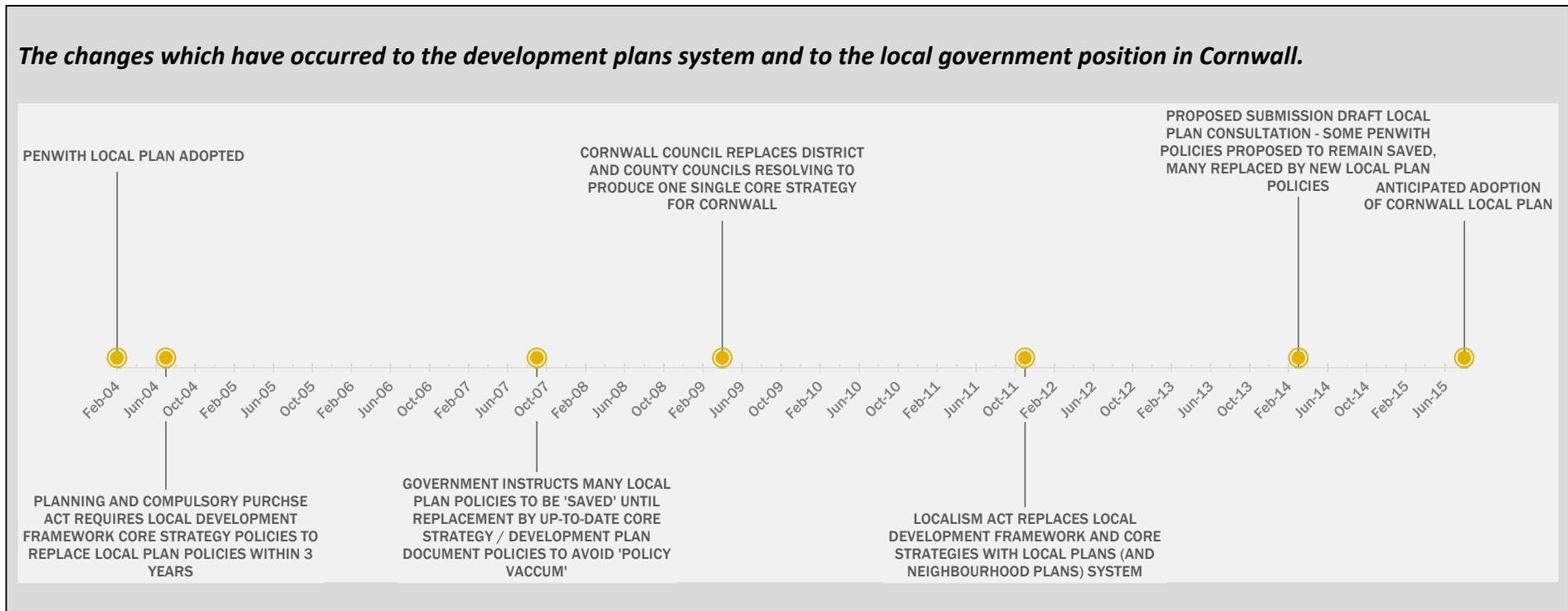
With no replacement Core Strategy in place by the end of the 3 year saving period, many policies in the Penwith Local Plan were then 'saved' again to avoid a 'policy vacuum' (or deficit) in

³ See http://www.cornwall.gov.uk/media/3634834/Local_Plan_Text.pdf for a copy of the Plan.

⁴ See <http://www.cornwall.gov.uk/environment-and-planning/planning/planning-policy/interim-and-adopted-planning-policy/penwith-district-saved-policies/> for further details.

planning policy coverage prior to a replacement plan being produced. Therefore, until a Local Plan for Cornwall is adopted, these saved policies will continue to have some 'weight' in the decision making process. The weight will vary with the degree to which the policy is still relevant in terms of evidence and national policy.

Figure 2



Many of these saved policies now remain such until a Cornwall-wide Local Plan is adopted to avoid the absence of policy coverage for certain topics, issues and proposals. When the Cornwall Local Plan is adopted, if the list of proposed policies to be saved remains as currently proposed, those saved will be either be those relating to the implementation of site specific development allocations (as the Local Plan only contains strategic policies and cannot replace them, with replacement instead being considered through the development of the Site Specific Allocations Development Plan Document) and a policy relating to Areas of Great Landscape Value (where Cornwall Council has a commitment to review these areas in the future).

Assessment of Saved Policies

The table in Appendix 1 sets out the list of current saved policies (reproduced in full in Appendix 2) and those which will be deleted and replaced by policies in the emerging Local Plan if adopted in its current form. It also sets out those policies which will remain saved. An appraisal of the policies currently saved but which will be replaced has been undertaken to ascertain whether the neighbourhood plan should consider including policies at the local level to replace them, and to set out an understanding of which of them will be adequately replaced by policies in the emerging Local Plan.

Paragraph 3.6 of the emerging Cornwall Local Plan suggests that *“Neighbourhood development plans can choose to focus on a few issues or cover a wide range. These could include allocation of land for housing and economic development or be development management policies covering issues such as design and the identification and protection of community green spaces and local historic assets.”*⁵ Therefore, the appropriateness of including development management style ‘criteria based’ policies in the neighbourhood plan relating to specific issues, sites or types of development currently covered by the saved policies needs to be considered. In addition, an

⁵ See p.48, Cornwall Local Plan – Strategic Policies – Proposed Submission

understanding is required of the degree of policy coverage, guidance and protection that the strategic policies in the emerging Local Plan provide.

However, this report stops short of drafting policies for the neighbourhood plan. This process will need to commence once further community consultation has taken place and the results of which have been set out alongside this and other the evidence reports, from which key themes of focus, a Vision, Objectives and Options for the neighbourhood plan can be set. At that point, policies can be drafted which meet the outputs and outcomes from these processes / stages.

The assessment has been undertaken by scrutinising the emerging Local Plan and it must therefore be recognised that the final policy content of the emerging Local Plan cannot be pre-determined. Wording and policy content may therefore change during the process which could have implications for whether or not content of a saved policy will need coverage in the neighbourhood plan.

Findings

While the majority of current saved policies are proposed to be replaced by new policies in the emerging Cornwall Local Plan, there is no specific justification set out by Cornwall Council for which of the emerging Local Plan's policies replace which saved policies from the Penwith Local Plan. The assessment table in Appendix 1 therefore attempts to link saved policies to be replaced with the policies in the emerging Local Plan most likely to provide coverage in full or in part, although in many cases, the saved policies from the Penwith Local Plan are issue or topic specific and it can therefore sometimes be difficult to say with certainty that the emerging policies in the Cornwall Local Plan will adequately replace them. This is particularly the case in relation to development management style policies applied directly to planning applications. Replacement is therefore sometimes only 'implied' by new policies in the emerging Local Plan, with many being more generic and 'all-encompassing' across different development types, locations or scenarios.

This approach, while following the (arguably) more permissive approach to development outlined in the NPPF, does allow more judgement to be placed on the merits of a proposal and it could be argued, suggesting greater flexibility and less ‘control’ over local specificity or impact of development. In many cases, therefore, it is arguable as to the degree of ‘replacement’ which will actually occur when the emerging Local Plan is adopted and there are therefore opportunities for the neighbourhood plan to ensure that locally derived specific policy requirements are put in place where considered necessary, are properly evidenced and ‘add value’ at the local level to policies set out in national policy and guidance and the emerging Local Plan.

The saved policies from the Penwith Local Plan will not be able to be simply ‘copy and pasted’ into the neighbourhood plan. This is for three main reasons:

1. The policies are drafted in a style which reflects the national planning guidance and style of policy writing at the time, meaning that they are often set out in a negative way, for example “Development will not be permitted unless...”. However, current Government planning policy and guidance contained within the National Planning Policy Framework (NPPF) sets out a presumption in favour of sustainable development (and spells out what that means⁶) and so policies need to be written in a more permissive and positive way

⁶ Paragraph 14 (p.4) of the NPPF states that “At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.

For plan-making this means that:

- local planning authorities should positively seek opportunities to meet the development needs of their area;
- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
 - specific policies in this Framework indicate development should be restricted. See note 9 below.

For decision-taking this means:¹⁰

- approving development proposals that accord with the development plan without delay; and
- where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
 - specific policies in this Framework indicate development should be restricted. See note 9 below.

Note 9 - For example, those policies relating to sites protected under the Birds and Habitats Directives (see paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green

along the lines of “Development will be permitted unless...”. This more permissive style can be seen in numerous policies in the emerging Cornwall Local Plan.

2. The evidence behind the neighbourhood plan will have to justify policy wording in the plan and merely relying on the evidence which led to the drafting of the saved policies some time ago will not be sufficient to support policies in the neighbourhood plan. However, the evidence base which supports the neighbourhood plan (including this report) may well lead to the conclusion that the aims of some of the policies currently saved and the outcomes that they are seeking to achieve remain relevant and so in these cases, there may be justification for refreshing current saved policies to make them ‘fit for purpose’ for the neighbourhood plan.
3. The ‘weight’ given to the saved policies in some cases is now different to that given when they were first adopted. This is because national policy has changed since they were adopted and more recent policy and guidance in the NPPF will take precedence where there is conflict.

The neighbourhood plan will need to be ‘in line’ with the national planning policies in the NPPF and NPPG, as well as with the strategic policies of the emerging Local Plan. While the assessment in this report includes a brief commentary on current saved policies’ relationship with the NPPF, further scrutiny of the neighbourhood plan policies will be needed as they are drafted to ensure that they are compliant with the NPPF and NPPG.

From the appraisal in Appendix 1, the following currently saved policies which will be replaced (deleted) with the adoption of the Local Plan seek outcomes for which the neighbourhood plan may also wish to have policies. Appendix 1 gives details of the reasoning behind this list.

Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion.
Note 10 - Unless material considerations indicate otherwise.

Policy No.	Name
GD1	Integration of development with surroundings
GD2	Design and layout of development
GD3	Incorporation of landscaping and planting within development
GD6	Control of advertisements and signs
GD7	Conversion of non-residential buildings
GD8	Conversion of buildings of local significance
CC1	Protection of landscape character etc.
CC2	Proposals involving interpretation of landscape character etc.
CC4	Conservation and enhancement of Heritage Coast
CC5	Protection of Areas of Great Landscape Value
CC6	Protection of Special Area of Conservation/Special Protection Area
CC7	Protection of Sites of Special Scientific Interest
CC8	Protection of Areas of Great Scientific Value, County Wildlife Sites, County Geological Sites, Ancient Woodland Sites and Local Nature Reserves
CC9	Protection of protected species or habitat
CC10	Protection of integrity/continuity of landscape features and habitats of major importance for wild flora and fauna
CC11	Creation and management of landscape features and habitats of major importance for wild flora and fauna
CC12	Prevention of loss or damage to significant trees, woodlands, hedgerows and Cornish hedges
CC13	Control/management of tree planting and hedgerow schemes
CC14	Protection of the shoreline and coastal waters
CC15	Protection of Scheduled Ancient Monuments and other nationally important archaeological remains
CC16	Protection of areas of great historic value/archaeological remains of county importance
CC17	Protection of Historic parks and Gardens
TV2	Protection of environmental value of specified open areas
TV3	Protection of open areas within towns and villages
TV4	Prevention of loss of/damage to trees
TV5	Tree planting schemes
TV7	Redevelopment or alteration of shops or other commercial premises (within Conservation Areas)
TV8	Control of advertisements within conservation areas
TV9	Control of PVC-U and other non-traditional replacement windows and doors within conservation areas subject to article 4 direction
TV13	Retention of traditional shop fronts
TV26	Control of number of residential or holiday units on Harvey's Towans, Hayle
H18	Design and layout of residential development
E2	Industrial and business development on town edges

Policy No.	Name
E3	Industrial and business development on smaller town edges
E6	Farm diversification projects
TM2	Control of loss of holiday accommodation
TM4	Additional provision for caravans and tents
TM5	Holiday accommodation within Towans area
TM6	Conditional control of proposals for holiday accommodation
TM9	Replacement chalets, extensions or other structures within Riviere Towans
TM13	Conversion of an existing building as a camping barn
R3	Development resulting in loss of existing or proposed open areas in formal or informal recreational use
R4	Development affecting the recreational value of (specific) areas
R7	Stable accommodation
TP12	Control of car parking provision in development
CS2	Loss of existing community facilities
CS11	Telecommunications equipment

Recommendations

The following recommendations flow from the findings of this report.

1. The steering group should consider and agree that the majority of infrastructure projects identified in the INA are 'strategic' in nature and therefore should continue to be dealt with through the planning processes Cornwall Council is already progressing. This will mean that the list of issues more appropriately dealt with through the Local Plan and associated DPDs comprises housing allocations, employment allocations and 'strategic' infrastructure projects identified in the INA. The steering group should discuss this further with officers from Cornwall Council and present the position to the community for consultation at the appropriate time in the Plan's preparation.
2. When the policies are drafted for the neighbourhood plan, together with other evidence, the table in Appendix 1 is used as a basis for identifying appropriate policy content for the

neighbourhood plan, in terms of providing adequate locally based replacement policies for current saved Penwith Local Plan policies.

3. The steering group should hold further discussion with officers from Cornwall Council in relation to the findings of this report.

Appendix 1 – Appraisal of the ‘Fitness for Purpose’ of the Saved Penwith Local Plan Policies for Transfer to the Hayle Neighbourhood Plan

Policy No.	Name	currently saved?	proposed to remain saved when Local Plan adopted?	proposed to be replaced by the Local Plan when adopted?	proposed Local Plan policies replace the saved content?	which ones	is there a case for further consideration of similar local policy coverage in the neighbourhood plan?
ST1	Plan strategy	✓		✓	✓	Policy 2 Key targets and spatial strategy Policy 3 Role and function of places Policy PP2 Hayle and St Ives CNA	Additional coverage in the neighbourhood plan is likely to be unnecessary.
GD1	Integration of development with surroundings	✓		✓	✓	Policy 13 Design	Although there are parameters set by the emerging Local Plan in terms of design, there is no detail in terms of local requirements and so this is an area where the neighbourhood plan could add a design requirements policy which gives weight to locally specific detailed requirements in a design guide or design code which could be developed as a document which sits alongside or is supplementary to the main plan itself. It is understood that Gwinear-Gwithian Parish Council is taking a similar approach. Section 7 of the NPPF is particularly relevant.
GD2	Design and layout of development	✓		✓	✓	Policy 2 Key targets and spatial strategy Policy 13 Design	
GD3	Incorporation of landscaping and planting within development	✓		✓	✓	Policy 13 Design Policy 25 Green infrastructure	

Policy No.	Name	currently saved?	proposed to remain saved when Local Plan adopted?	proposed to be replaced by the Local Plan when adopted?	proposed Local Plan policies replace the saved content?	which ones	is there a case for further consideration of similar local policy coverage in the neighbourhood plan?
GD4	Provision for drainage/water supply and prevention of pollution/flooding	✓		✓	✓	Policy 14 Development standards Policy 26 Flood risk management and coastal change Policy 28 Infrastructure Policy PP2 Hayle and St Ives CNA	Additional coverage in the neighbourhood plan is likely to be unnecessary.
GD5	Requirements for safe movement of traffic	✓		✓	✓	Policy 14 Development standards Policy 27 Transport and accessibility	Additional coverage in the neighbourhood plan is likely to be unnecessary.
GD6	Control of advertisements and signs	✓		✓	×		There is no specific coverage relating to the control of advertisements in the emerging Local Plan. Therefore, this is an area where the neighbourhood plan could add a policy in relation to signs and advertisements which gives weight to locally specific detailed requirements

Policy No.	Name	currently saved?	proposed to remain saved when Local Plan adopted?	proposed to be replaced by the Local Plan when adopted?	proposed Local Plan policies replace the saved content?	which ones	is there a case for further consideration of similar local policy coverage in the neighbourhood plan?
							encapsulated in a design guide or design code which could be developed as a document which sits alongside or is supplementary to the main plan itself. Paragraph 67 of the NPPF is particularly relevant. (Linked to saved policy TV8.)
GD7	Conversion of non-residential buildings	✓		✓	in part / implied	Policy 7 Housing in the countryside Policy 13 Design Policy 14 Development standards	The emerging Local Plan covers the saved policy to some degree with many of the criteria incorporated in policies. However, there are no specific policies in the emerging Local Plan which deal with, in detail, proposals for the conversion of non-residential buildings or buildings of local significance specifically and this may be something which the neighbourhood plan would wish to consider. However, the permissive nature of the decision making process outlined in the NPPF will need to borne in mind if this is considered to be a key issue for the Plan.
GD8	Conversion of buildings of local significance	✓		✓	✓	Policy 13 Design Policy 14 Development standards Policy 24 Historic Environment	Although there are parameters set by the emerging Local Plan in terms of design, there is no detail in terms of local requirements and so this is an area where the neighbourhood plan could add a design requirements policy which gives weight to locally specific detailed requirements in a design guide or design code which could be developed as a

Policy No.	Name	currently saved?	proposed to remain saved when Local Plan adopted?	proposed to be replaced by the Local Plan when adopted?	proposed Local Plan policies replace the saved content?	which ones	is there a case for further consideration of similar local policy coverage in the neighbourhood plan?
							document which sits alongside or is supplementary to the main plan itself.
CC1	Protection of landscape character etc.	✓		✓	✓	Policy 2 Key targets and spatial strategy Policy 23 Natural Environment	It could be argued that national and emerging Local Plan policy, together with formal designations of important assets in landscape and heritage terms provide sufficient protection and guidance in relation to development which could affect such assets and areas. However, although there are policies which seek to protect key landscape and heritage assets in the emerging Local Plan, they are not for named areas. These are policy areas therefore where there is an opportunity, if considered necessary, for the neighbourhood plan to add locally specific detail to ensure the protection of locally valued assets and areas and to set appropriate parameters for development proposals which may affect the quality of such assets and areas (where underpinned by evidence). This could be achieved in a similar way to the approach to design issues, with a detailed assessment or guide being produced as a supplementary document given 'weight' by a policy in the neighbourhood plan.
CC2	Proposals involving interpretation of landscape character etc.	✓		✓	✓	Policy 23 Natural Environment	
CC4	Conservation and enhancement of Heritage Coast	✓		✓	✓	Policy 2 Key targets and spatial strategy Policy 23 Natural Environment	
CC5	Protection of Areas of Great Landscape Value	✓	✓		na	na	This policy will remain saved on adoption of the Local Plan pending a review of

Policy No.	Name	currently saved?	proposed to remain saved when Local Plan adopted?	proposed to be replaced by the Local Plan when adopted?	proposed Local Plan policies replace the saved content?	which ones	is there a case for further consideration of similar local policy coverage in the neighbourhood plan?
							Areas of Great Landscape Value ⁷ . However, discussion should take place with officers at Cornwall Council to help determine whether a policy in the neighbourhood plan would add value to the saved policy and the 'statements' to be produced. The neighbourhood plan could set out a policy which specifies or names the AGLV in Hayle to provide locally specific policy coverage and provide a 'safety net' policy should the save policy not be adequately replaced during the lifetime of the neighbourhood plan.
CC6	Protection of Special Area of Conservation/Special Protection Area	✓		✓	✓	Policy 2 Key targets and spatial strategy Policy 23 Natural Environment	It could be argued that national and emerging Local Plan policy, together with formal designations of important assets in landscape and heritage terms provide sufficient protection and guidance in relation to development which could affect such assets and areas. However, although there are policies which seek to protect key landscape, natural and heritage assets in the emerging Local Plan, they are not for named areas. These are policy areas therefore where
CC7	Protection of Sites of Special Scientific Interest	✓		✓	✓	Policy 2 Key targets and spatial strategy Policy 23	

⁷ See paragraph 2.95 of Cornwall Local Plan – Strategic Policies (Proposed Submission), part of which states: “We will undertake reassessment of the descriptions and extent of each Area of Great Landscape Value to inform and produce strong revised statements of these local designations of landscape value.”

Policy No.	Name	currently saved?	proposed to remain saved when Local Plan adopted?	proposed to be replaced by the Local Plan when adopted?	proposed Local Plan policies replace the saved content?	which ones	is there a case for further consideration of similar local policy coverage in the neighbourhood plan?
						Natural Environment	there is an opportunity, if considered necessary, for the neighbourhood plan to add locally specific detail to ensure the protection of locally valued assets and areas and to set appropriate parameters for development proposals which may affect the quality of such assets and areas (where underpinned by evidence).
CC8	Protection of Areas of Great Scientific Value, County Wildlife Sites, County Geological Sites, Ancient Woodland Sites and Local Nature Reserves	✓		✓	✓	Policy 2 Key targets and spatial strategy Policy 23 Natural Environment	
CC9	Protection of protected species or habitat	✓		✓	✓	Policy 2 Key targets and spatial strategy Policy 23 Natural Environment	
CC10	Protection of integrity/continuity of landscape features and habitats of major importance for wild flora and fauna	✓		✓	✓	Policy 2 Key targets and spatial strategy Policy 23 Natural Environment Policy 25 Green infrastructure	
CC11	Creation and	✓		✓	✓	Policy 2 Key	It could be argued that national and emerging Local Plan policy, together with formal designations of important assets in landscape and habitat terms provide sufficient protection and guidance in relation to development which could affect such assets and areas. However, although there are policies which seek to protect key landscape and natural assets in the emerging Local Plan, they are not for named areas. Some of the types of

Policy No.	Name	currently saved?	proposed to remain saved when Local Plan adopted?	proposed to be replaced by the Local Plan when adopted?	proposed Local Plan policies replace the saved content?	which ones	is there a case for further consideration of similar local policy coverage in the neighbourhood plan?
	management of landscape features and habitats of major importance for wild flora and fauna					<p>targets and spatial strategy</p> <p>Policy 23 Natural Environment</p> <p>Policy 25 Green infrastructure</p>	<p>valued landscape, natural and habitat features, may, however, not have formal designations, something which the neighbourhood plan may wish to address by giving some locally valued assets a local designation.</p> <p>These are policy areas therefore where there is an opportunity, if considered necessary, for the neighbourhood plan to add locally specific detail to ensure the protection of locally valued assets and areas and to set appropriate parameters for development proposals which may affect the quality of such assets and areas (where underpinned by evidence).</p>
CC12	Prevention of loss or damage to significant trees, woodlands, hedgerows and Cornish hedges	✓		✓	✓	<p>Policy 2 Key targets and spatial strategy</p> <p>Policy 23 Natural Environment</p> <p>Policy 25 Green infrastructure</p>	
CC13	Control/management of tree planting and hedgerow schemes	✓		✓	×		<p>There is no specific coverage relating to tree planting and hedgerow schemes in the emerging Local Plan. Therefore, this is an area where the neighbourhood plan could add a policy in relation to signs and advertisements which gives weight to locally specific detailed requirements encapsulated in a design guide or design code which could be developed as a document which sits alongside or is</p>

Policy No.	Name	currently saved?	proposed to remain saved when Local Plan adopted?	proposed to be replaced by the Local Plan when adopted?	proposed Local Plan policies replace the saved content?	which ones	is there a case for further consideration of similar local policy coverage in the neighbourhood plan?
							supplementary to the main plan itself.
CC14	Protection of the shoreline and coastal waters	✓		✓	✓	<p>Policy 2 Key targets and spatial strategy</p> <p>Policy 23 Natural Environment</p> <p>Policy 24 Historic Environment</p>	<p>It could be argued that national and emerging Local Plan policy, together with formal designations of important assets in landscape and heritage terms provide sufficient protection and guidance in relation to development which could affect such assets and areas. However, although there are policies which seek to protect key landscape and natural assets in the emerging Local Plan, they are not for named areas. Some of the types of valued landscape, natural and habitat features of the coastal shoreline, may, however, not have formal designations, something which the neighbourhood plan may wish to address by giving some locally valued assets a local designation.</p> <p>These are policy areas therefore where there is an opportunity, if considered necessary, for the neighbourhood plan to add locally specific detail to ensure the protection of locally valued assets and areas and to set appropriate parameters for development proposals which may affect the quality of such assets and areas (where underpinned by evidence).</p>
CC15	Protection of Scheduled	✓		✓	✓	Policy 2 Key	It could be argued that national and

Policy No.	Name	currently saved?	proposed to remain saved when Local Plan adopted?	proposed to be replaced by the Local Plan when adopted?	proposed Local Plan policies replace the saved content?	which ones	is there a case for further consideration of similar local policy coverage in the neighbourhood plan?
	Ancient Monuments and other nationally important archaeological remains					targets and spatial strategy Policy 24 Historic Environment	emerging Local Plan policy, together with formal designations of important national and county-wide assets in historic, heritage and archaeological terms provide sufficient protection and guidance in relation to development which could affect such assets and areas. However, although there are policies which seek to protect such assets in the emerging Local Plan, they are not for named assets or areas. Neither is there policy which considers locally important heritage and archaeological assets (if they exist) and so the neighbourhood plan may wish to add the local dimension by seeking to protect locally important assets through designation.
CC16	Protection of areas of great historic value/archaeological remains of county importance	✓		✓	✓	Policy 2 Key targets and spatial strategy Policy 24 Historic Environment	
CC17	Protection of Historic parks and Gardens	✓		✓	✓	Policy 2 Key targets and spatial strategy Policy 24 Historic Environment	
CC18	Reclamation of derelict land/improvement of unsightly land	✓		✓	✓	Policy 22 Best use of land and existing buildings	
TV1	Focus of development on main towns, maximisation of use of previously	✓		✓	✓	Policy 22 Best use of land and existing	

Policy No.	Name	currently saved?	proposed to remain saved when Local Plan adopted?	proposed to be replaced by the Local Plan when adopted?	proposed Local Plan policies replace the saved content?	which ones	is there a case for further consideration of similar local policy coverage in the neighbourhood plan?
	developed land, protection of character/setting					buildings Policy PP2 Hayle and St Ives CNA	
TV2	Protection of environmental value of specified open areas	✓		✓	✓	Policy 23 Natural Environment Policy 25 Green infrastructure	It could be argued that national and emerging Local Plan policy, together with formal designations of important national and county-wide environmental assets provide sufficient protection and guidance in relation to development which could affect such assets and areas. However, although there are policies which seek to protect such areas in the emerging Local Plan, they are not for named areas. Neither is there policy which considers locally important environmental assets (if they exist) and so the neighbourhood plan may wish to add the local dimension by seeking to protect locally important areas through designation.
TV3	Protection of open areas within towns and villages	✓		✓	✓	Policy 23 Natural Environment Policy 25 Green infrastructure	
TV4	Prevention of loss of/damage to tress	✓		✓	✓	Policy 23 Natural Environment Policy 25 Green infrastructure	
TV5	Tree planting schemes	✓		✓	✗		There is no specific coverage relating to tree planting and hedgerow schemes or specifically to the prevention of the loss of or damage to trees in the emerging Local Plan. Therefore, this is an area where the neighbourhood plan could add a policy in relation to trees which gives weight to locally specific detailed

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							requirements encapsulated in a design guide or design code which could be developed as a document which sits alongside or is supplementary to the main plan itself.
TV7	Redevelopment or alteration of shops or other commercial premises (within Conservation Areas)	✓		✓	✓	Policy 24 Historic Environment	There is no specific coverage relating to specific types of development within conservation areas (for example, the control of advertisements or changes to shops and commercial premises) in the emerging Local Plan, although Policy 24 does set out generic parameters within which development proposals should adhere. Therefore, this is an area where the neighbourhood plan could add a policy in relation to specific types of development within conservation areas which gives weight to locally specific detailed requirements encapsulated in a design guide or design code, which could be developed as a document which sits alongside or is supplementary to the main plan itself. Paragraph 67 of the NPPF is particularly relevant.
TV8	Control of advertisements within conservation areas	✓		✓	×		There is no specific coverage relating to the control of materials in the emerging Local Plan. Therefore, this is an area where the neighbourhood plan could add a policy in relation to maintaining the
TV9	Control of PVC-U and other non-traditional replacement windows and doors within conservation areas	✓		✓	×		There is no specific coverage relating to the control of materials in the emerging Local Plan. Therefore, this is an area where the neighbourhood plan could add a policy in relation to maintaining the

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	subject to article 4 direction						character of conservation areas which gives weight to locally specific detailed requirements encapsulated in a design guide or design code which could be developed as a document which sits alongside or is supplementary to the main plan itself.
TV13	Retention of traditional shop fronts	✓		✓	in part / implied	Policy 4 Shopping, services and community facilities Policy PP2 Hayle and St Ives CNA	See response to TV7. While not the same as a policy which relates to conservation areas, locally valued traditional shop fronts (if there are any) could be sought to be retained through use of design guidance.
TV14	Protection of Historic Settlements	✓		✓	✓	Policy 24 Historic Environment	Additional coverage in the neighbourhood plan is likely to be unnecessary.
TV15	Re-use of previously developed (potentially contaminated) land	✓		✓	✓	Policy 22 Best use of land and existing buildings	Additional coverage in the neighbourhood plan is likely to be unnecessary.
TV16	Focus on major retail, office, entertainment, leisure and community developments within main towns	✓		✓	✓	Policy 3 Role and function of places Policy 4	Additional coverage in the neighbourhood plan is likely to be unnecessary.

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						Shopping, services and community facilities Policy PP2 Hayle and St Ives CNA	
TV17	Control of edge-of-centre/out-of-centre shopping facilities	✓		✓	✓	Policy 4 Shopping, services and community facilities Policy PP2 Hayle and St Ives CNA	Additional coverage in the neighbourhood plan is likely to be unnecessary.
TV18	Control of non-retail uses with Prime Shopping Areas of Penzance and St Ives	✓		✓	na	na	na
TV19	Control of retail, offices and other non-retail uses in town centres	✓		✓	✓	Policy 4 Shopping, services and community facilities	Additional coverage in the neighbourhood plan is likely to be unnecessary.
TV20	Prevention of loss of village or neighbourhood shops	✓		✓	✓	Policy 4 Shopping, services and	Additional coverage in the neighbourhood plan is likely to be unnecessary.

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						community facilities	
TV20A	Proposed redevelopment of former Cornwall Farmers Ltd site, Penzance	✓	✓		na	na	na
TV21	Control of development fronting Jennings Street	✓		✓	na	na	na
TV22	Control of development within Bread Street area, Penzance	✓	✓		na	na	na
TV23	Control of development of harbour car park, Penzance	✓	✓		na	na	na
TV24A	Control of development of harbourside area, Penzance	✓	✓		na	na	na
TV24B	Proposed provision of improved facilities for cargo handling	✓	✓		na	na	na
TV24C	Reservation of Jubilee Pool with land between the pool and Battery Road	✓	✓		na	na	na
TV25	Control of hot food take-	✓	✓		na	na	na

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	away outlets in St Ives						
TV25D	Proposed development of South Quay, Foundry Yard and South Quay, Hayle	✓	✓		na	na	na
TV25E	Proposed development of Foundry area, Hayle	✓	✓		na	na	na
TV26	Control of number of residential or holiday units on Harvey's Towans, Hayle	✓	✓		x		<p>There is no specific policy coverage for named areas in the emerging Local Plan with regard to the control of residential or holiday units on Harvey Towans.</p> <p>However, the policy is proposed to remain saved on adoption of the Local Plan. The bulk of the policy relates to design and character issues, which could be covered through a policy in the neighbourhood plan naming the Towans and 'signposting' requirements set out in a supplementary design guide or code as referred to above. This would amplify and add locally specific detail to the saved policy.</p> <p>However, the first part of the saved policy refers to an increase in the number of holiday units not being permitted. A discussion should be held with officers from Cornwall Council to help to determine the appropriateness of</p>

Policy No.	Name	currently saved?	proposed to remain saved when Local Plan adopted?	proposed to be replaced by the Local Plan when adopted?	proposed Local Plan policies replace the saved content?	which ones	is there a case for further consideration of similar local policy coverage in the neighbourhood plan?
							developing a similar policy in the neighbourhood plan to replace this part of the saved policy. This is because, if the policy remains saved until replaced, there may not be any added value in repeating the same criteria in the neighbourhood plan, although a new policy in the neighbourhood plan may allow the saved policy to be deleted given that the neighbourhood plan will be part of the development plan.
H1	Requirements for housing provision in Penwith	✓			✓	Policy 2 Key targets and spatial strategy Policy 6 Housing mix Policy 8 Affordable Housing	Additional coverage in the neighbourhood plan is likely to be unnecessary.
H2	Control of intensification of residential use	✓			✓	Policy 3 Role and function of places Policy 13 Design Policy 14 development	Additional coverage in the neighbourhood plan is likely to be unnecessary.

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						standards Policy 22 Best use of land and existing buildings	
H3	Development control on previously developed land and small greenfield sites in towns	✓		✓	✓	Policy 3 Role and function of places Policy 13 Design Policy 14 development standards Policy 22 Best use of land and existing buildings	Additional coverage in the neighbourhood plan is likely to be unnecessary.
H4	Development of small sites in St Just	✓		✓	na	na	na
H5	Development of small sites within smaller towns and larger villages	✓		✓	✓	Policy 3 Role and function of places Policy 13 Design	Additional coverage in the neighbourhood plan is likely to be unnecessary.

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						Policy 14 development standards Policy 22 Best use of land and existing buildings	
H6	Development of sites for 1/2 dwellings within smaller villages	✓		✓	✓	Policy 3 Role and function of places Policy 13 Design Policy 14 development standards Policy 22 Best use of land and existing buildings	Additional coverage in the neighbourhood plan is likely to be unnecessary.
H7	Prohibition of development, bar conversion of suitable existing buildings in specified villages	✓		✓	na	na	na
H8	Development outside	✓		✓	✓	Policy 3 Role	Additional coverage in the

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	towns and villages					<p>and function of places</p> <p>Policy 3 Role and function of places</p> <p>Policy 13 Design</p> <p>Policy 14 development standards</p> <p>Policy 22 Best use of land and existing buildings</p> <p>Policy 7 Housing in the countryside</p> <p>Policy 9 Affordable Housing led schemes</p>	neighbourhood plan is likely to be unnecessary.
H9	Replacement dwellings outside towns and villages	✓		✓	✓	Policy 7 Housing in the countryside	Additional coverage in the neighbourhood plan is likely to be unnecessary.

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H10	Sub-division of dwellings/change of use to multiple occupancy	✓		✓	✓	Policy 7 Housing in the countryside Policy 22 Best use of land and existing buildings	Additional coverage in the neighbourhood plan is likely to be unnecessary.
H11	Conversion of non-residential to dwellings	✓		✓	✓	Policy 22 Best use of land and existing buildings	Additional coverage in the neighbourhood plan is likely to be unnecessary.
H12	Conversion of vacant or under-used space above town centre premises to residential use	✓		✓	✓	Policy 22 Best use of land and existing buildings	Additional coverage in the neighbourhood plan is likely to be unnecessary.
H13	Requirements for negotiated element of affordable housing	✓		✓	✓	Policy 8 Affordable Housing Policy 9 Affordable Housing led schemes	Additional coverage in the neighbourhood plan is likely to be unnecessary.
H14	Requirements for secure arrangements for retention/occupancy of	✓		✓	✓	Policy 8 Affordable	Additional coverage in the neighbourhood plan is likely to be unnecessary.

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	affordable housing					Housing Policy 9 Affordable Housing led schemes	
H15	Development of 'rural exception sites' for affordable housing	✓		✓	✓	Policy 3 Role and function of places Policy 8 Affordable Housing Policy 9 Affordable Housing led schemes	Additional coverage in the neighbourhood plan is likely to be unnecessary.
H16	Development of residential care and nursing homes within towns and villages	✓		✓	✓	Policy 4 Shopping, services and community facilities	Additional coverage in the neighbourhood plan is likely to be unnecessary.
H17	Development of gypsy sites	✓		✓	✓	Policy 12 Gypsies, travellers and travelling showpeople	Additional coverage in the neighbourhood plan is likely to be unnecessary.

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H18	Design and layout of residential development	✓		✓	✓	Policy 13 Design	Although there are parameters set by the emerging Local Plan in terms of design, there is no detail in terms of local requirements and so this is an area where the neighbourhood plan could add a design requirements policy which gives weight to locally specific detailed requirements in a design guide or design code which could be developed as a document which sits alongside or is supplementary to the main plan itself. However, any such guidance will need to be discussed with Cornwall Council in terms of the relationship between the guidance and development of housing sites considered to be strategic and / or allocated in the Sites Allocation DPD.
H18A	Affordable housing at Penwith Street and Cross Street, Penzance	✓	✓		na	na	na
HC	Redevelopment of area at Alexandra Road - Western Promenade for housing	✓	✓		na	na	na
HD	Redevelopment of area at Queens Street for housing	✓	✓		na	na	na
HE	Conversion of building at Chywoone Hill, Newlyn for housing	✓		✓	na	na	na

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HF	Redevelopment behind Madison Terrace and Beatrice Terrace, Hayle	✓		✓			No, redevelopment delivered.
HG	Redevelopment behind Copper Terrace, Hayle	✓	✓		na	na	na
HJ	Redevelopment of area adjacent to Old Stennack School	✓	✓		na	na	na
E1	Industrial and business development	✓		✓	✓	<p>Policy 5 Jobs and skills</p> <p>Policy 3 Role and function of places</p> <p>Policy 13 Design</p> <p>Policy 14 development standards</p> <p>Policy 22 Best use of land and existing buildings</p> <p>Policy PP2 Hayle and St Ives CNA</p>	Additional coverage in the neighbourhood plan is likely to be unnecessary.

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E2	Industrial and business development on town edges	✓		✓	✓	Policy 5 Jobs and skills Policy 3 Role and function of places Policy 13 Design Policy 14 development standards Policy 22 Best use of land and existing buildings Policy PP2 Hayle and St Ives CNA	<p>The criteria for suitable locations for employment development are covered by policies in the emerging Local Plan. However, the last part of the policy considers that proposals should be compatible with surrounding uses and the character of the area. This is also largely covered by the emerging Local Plan, but though there are parameters set by the emerging Local Plan in terms of design, there is no detail in terms of local requirements and so this is an area where the neighbourhood plan could add a design requirements policy which gives weight to locally specific detailed requirements in a design guide or design code which could be developed as a document which sits alongside or is supplementary to the main plan itself.</p>
E3	Industrial and business development on smaller town edges	✓		✓	✓	Policy 5 Jobs and skills Policy 3 Role and function of places Policy 13 Design Policy 14	

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						development standards Policy 22 Best use of land and existing buildings Policy PP2 Hayle and St Ives CNA	
E4	Conversion of buildings for industrial and business use	✓		✓	✓	Policy 13 Design Policy 22 Best use of land and existing buildings Policy 27 Transport and accessibility	Additional coverage in the neighbourhood plan is likely to be unnecessary.
E5	Prevention of irreversible loss of high grade agricultural land	✓		✓	✓	Policy 22 Best use of land and existing buildings	Additional coverage in the neighbourhood plan is likely to be unnecessary.
E6	Farm diversification projects	✓		✓	✓	Policy 5 Jobs and skills Policy 22 Best	If considered appropriate for Hayle, a policy could be considered which adds local specificity or requirements to the policies which govern this type of

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						use of land and existing buildings	redevelopment. For example, Policy PP1 West Penwith CNA specifically supports diversification of the rural economy, where PP2 for Hayle and St Ives does not. Paragraph 28 of the NPPF is particularly relevant.
E7	Development essential to agriculture and forestry industries	✓		✓	✓	Policy 5 Jobs and skills Policy 22 Best use of land and existing buildings Policy PP2 Hayle and St Ives CNA	Additional coverage in the neighbourhood plan is likely to be unnecessary.
E8	Development directly related to fishing industry	✓		✓	✓	Policy 5 Jobs and skills Policy 22 Best use of land and existing buildings	Additional coverage in the neighbourhood plan is likely to be unnecessary.
E9	Change of use of industrial sites (in Newlyn)	✓		✓	na	na	na
EA	Area to east of creamery	✓		✓	na	na	na

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	at St Erth						
EB	Area south of the railway line at St Erth station	✓		✓	na	na	na
EC	Area south of the railway line at St Erth station	✓		✓	na	na	na
ED	North of sewage works St Erth	✓		✓	na	na	na
E10	Change of use of industrial land and buildings	✓		✓	✓	Policy 5 Jobs and skills Policy 22 Best use of land and existing buildings Policy PP2 Hayle and St Ives CNA	Additional coverage in the neighbourhood plan is likely to be unnecessary.
EE	Western end of Chy an dour Coombe	✓	✓		na	na	na
EF	Area in Chy an dour Coombe	✓	✓		na	na	na
EG	Eastern end of Chy an dour Coombe	✓	✓		na	na	na
EH	West of Gulval	✓		✓	na	na	na

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EJ	Ludgvan Lease	✓		✓	na	na	na
EK	The Creamery at St Erth	✓		✓	na	na	na
E11	Industrial and business development	✓		✓	✓	<p>Policy 2 Key targets and spatial strategy</p> <p>Policy 4 Shopping, services and community facilities</p> <p>Policy 5 Jobs and skills</p> <p>Policy 14 Development standards</p>	Additional coverage in the neighbourhood plan is likely to be unnecessary.
TM1	Development related to tourism	✓		✓		<p>Policy 5 Jobs and skills</p> <p>Policy 23 Natural Environment</p> <p>Policy 24 Historic</p>	Additional coverage in the neighbourhood plan is likely to be unnecessary.

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						Environment Policy PP2 Hayle and St Ives CNA	
TM2	Control of loss of holiday accommodation	✓		✓	in part / implied	Policy 5 Jobs and skills Policy 8 Affordable housing PP2 Hayle and St Ives CNA	The loss of holiday accommodation is not directly referred to in the emerging Local Plan policies. However there is support for sustainable tourism and recognition of the importance of tourism to the local economy. The neighbourhood plan may wish to consider whether there is a need for a similar type of policy to ensure that existing stock and quality of provision is maintained. Part of this consideration should include discussion with officers from Cornwall Council regarding the effectiveness or not of saved policy TM2 since adoption of the Penwith Local Plan.
TM3	Development of hotels and other new build holiday accommodation	✓		✓	✓	Policy 5 Jobs and skills Policy 22 Best use of land and existing buildings	Additional coverage in the neighbourhood plan is likely to be unnecessary.
TM4	Additional provision for caravans and tents	✓		✓	in part / implied	Policy 7 Housing in the	There is no specific policy coverage in relation to additional provision for caravans and tents and so the

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						countryside Policy 23 Natural Environment	neighbourhood plan may wish to consider similar policy coverage where justified by evidence.
TM5	Holiday accommodation within Towans area	✓		✓	in part / implied	Policy PP2 Hayle and St Ives CNA	There is no specific policy coverage in relation to preventing additional or intensified holiday accommodation in the Towans area and so the neighbourhood plan may wish to consider similar policy coverage where justified by evidence.
TM6	Conditional control of proposals for holiday accommodation	✓		✓	×		There is no specific policy coverage in relation to controlling proposed holiday accommodation development through conditions on use and so the neighbourhood plan may wish to consider similar policy coverage where justified by evidence.
TM7	Improvement of existing holiday sites	✓		✓	✓	Policy 5 Jobs and skills	Additional coverage in the neighbourhood plan is likely to be unnecessary.
TM8	Replacement chalets, extensions or other structures within Gwithian Towans	✓		✓	na	na	na
TM9	Replacement chalets, extensions or other	✓		✓	in part / implied	Policy PP2 Hayle and St Ives CNA	There is no specific policy coverage in relation to replacement chalets,

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	structures within Riviere Towans						extensions or other structures within Riviere Towans and so the neighbourhood plan may wish to consider similar policy coverage where justified by evidence.
TM10	Visitor attractions in or on the edge of small towns and villages	✓		✓	✓	Policy 5 Jobs and skills Policy 22 Best use of land and existing buildings Policy PP2 Hayle and St Ives CNA	Additional coverage in the neighbourhood plan is likely to be unnecessary.
TM11	Development of visitor centre at Geevor Mine	✓		✓	na	na	na
TM12	Conversion of buildings to visitor attractions or holiday accommodation	✓		✓	✓	Policy 5 Jobs and skills Policy 22 Best use of land and existing buildings Policy PP2 Hayle and St Ives CNA	Additional coverage in the neighbourhood plan is likely to be unnecessary.

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TM13	Conversion of an existing building as a camping barn	✓		✓	in part / implied	<p>Policy 5 Jobs and skills</p> <p>Policy 22 Best use of land and existing buildings</p>	Additional coverage in the neighbourhood plan is likely to be unnecessary unless there are specific concerns about conversion of buildings into camping barns.
R1	New or improved recreational and sports facilities	✓		✓	✓	<p>Policy 4 Shopping, services and community facilities</p> <p>Policy 13 Design</p> <p>Policy 17 Health and wellbeing</p> <p>Policy 22 Best use of land and existing buildings</p> <p>Policy 25 Green infrastructure</p> <p>Policy PP2 Hayle and St Ives CNA</p>	Additional coverage in the neighbourhood plan is likely to be unnecessary.
RB	Outdoor sports provision	✓		✓	na	na	na

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	adjacent to St Ives RFC						
R2	Provision of children's play space to serve residential development	✓		✓	✓	Policy 4 Shopping, services and community facilities Policy 13 Design Policy 17 Health and wellbeing Policy 25 Green infrastructure	Additional coverage in the neighbourhood plan is likely to be unnecessary.
RC	Proposal to reserve children's play space	✓		✓	na	na	na
R3	Development resulting in a loss of existing or proposed open areas in formal or informal recreational use	✓		✓	✓	Policy 4 Shopping, services and community facilities Policy 13 Design Policy 17 Health and wellbeing Policy 22 Best	While there is considered to be sufficient policy coverage in the emerging Local Plan to protect such areas, a locally specific policy could be included in the neighbourhood plan to protect named local areas of value.

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						use of land and existing buildings Policy 25 Green infrastructure	
R4	Development affecting the recreational value of (specific) areas	✓		✓	×		
R5	Recreational facilities in the countryside	✓		✓	✓	Policy 4 Shopping, services and community facilities	Additional coverage in the neighbourhood plan is likely to be unnecessary.
R6	Informal recreational activities and access to countryside	✓		✓	✓	Policy 13 Design Policy 17 Health and wellbeing Policy 22 Best use of land and existing buildings Policy 25 Green infrastructure	Additional coverage in the neighbourhood plan is likely to be unnecessary.
R7	Stable accommodation	✓		✓	in part / implied	Policy 5 Jobs	Additional coverage in the

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						<p>and skills</p> <p>Policy 22 Best use of land and existing buildings</p> <p>Policy 23 Natural environment</p>	neighbourhood plan is likely to be unnecessary unless there are specific concerns about the provision of stables.
R8	Facilitation of water related recreation	✓		✓	✓	<p>Policy 4 Shopping, services and community facilities</p> <p>Policy 13 Design</p> <p>Policy 17 Health and wellbeing</p> <p>Policy 22 Best use of land and existing buildings</p> <p>Policy 25 Green infrastructure</p>	Additional coverage in the neighbourhood plan is likely to be unnecessary.

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R9	Recreational facilities	✓		✓	✓	Policy 13 Design Policy 14 Development standards	Additional coverage in the neighbourhood plan is likely to be unnecessary.
TP1	Transportation proposals	✓		✓	✓	Policy 13 Design Policy 14 Development standards	Additional coverage in the neighbourhood plan is likely to be unnecessary.
TP2	Public transport facilities	✓		✓	✓	Policy 27 Transport and accessibility	Additional coverage in the neighbourhood plan is likely to be unnecessary.
TPA	Proposal to reserve an area at The Malakoff, St Ives for a 'bus station'	✓		✓	na	na	na
TPB	Penzance bus station	✓		✓	na	na	na
TP3	Development on operational railway land	✓		✓	in part / implied	Policy 27 Transport and accessibility	Additional coverage in the neighbourhood plan is likely to be unnecessary.
TP4	Control efficient and safe operation of port and harbour	✓		✓	in part / implied	Policy 2 Key targets and spatial strategy Policy 5 Jobs	Additional coverage in the neighbourhood plan is likely to be unnecessary.

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						and skills	
TP5	Cycle routes and parking facilities	✓		✓	✓	Policy 13 Design	Additional coverage in the neighbourhood plan is likely to be unnecessary.
TP6	Protection of routes	✓		✓	✓	Policy 14 Development standards	Additional coverage in the neighbourhood plan is likely to be unnecessary.
TP7	Control of development which would affect existing rights of way	✓		✓	✓	Policy 27 Transport and accessibility	Additional coverage in the neighbourhood plan is likely to be unnecessary.
TP8	Road improvement schemes	✓		✓	✓		Additional coverage in the neighbourhood plan is likely to be unnecessary.
TP9	Roadside facilities	✓		✓	✓	Policy 27 Transport and accessibility	Additional coverage in the neighbourhood plan is likely to be unnecessary.
TP10	Transshipment facilities	✓		✓	✓	Policy 5 Jobs and skills Policy 27 Transport and accessibility	Additional coverage in the neighbourhood plan is likely to be unnecessary.
TP11	New and improved town centre rear access arrangements	✓		✓	✗		Additional coverage in the neighbourhood plan is likely to be unnecessary.

Policy No.	Name	currently saved?	proposed to remain saved when Local Plan adopted?	proposed to be replaced by the Local Plan when adopted?	proposed Local Plan policies replace the saved content?	which ones	is there a case for further consideration of similar local policy coverage in the neighbourhood plan?
TP12	Control of car parking provision in development	✓		✓	in part / implied	Policy 14 – Development standards	There are no car parking standards obviously identified in the emerging Local Plan. Discussion will need to be had with officers at Cornwall Council to understand where parking standards are likely to appear in policy terms if at all (for example the emerging Local Plan refers to Parking Strategies for CNAs) and it may therefore be appropriate for the neighbourhood plan to develop its own. Paragraphs 39 and 40 of the NPPF are particularly relevant.
TP13	New car parks	✓		✓	✓	Policy 14 – Development standards Policy 27 Transport and accessibility	Additional coverage in the neighbourhood plan is likely to be unnecessary.
CS1	New or improved community facilities	✓		✓	✓	Policy 3 Role and function of places	Additional coverage in the neighbourhood plan is likely to be unnecessary.
CS2	Loss of existing community facilities	✓		✓	✓	Policy 4 Shopping, services and community facilities	While the emerging Local Plan policies seek to resist the loss of community facilities, it may be appropriate for the neighbourhood plan to identify specific facilities that it would wish to protect.

Policy No.	Name	currently saved?	proposed to remain saved when Local Plan adopted?	proposed to be replaced by the Local Plan when adopted?	proposed Local Plan policies replace the saved content?	which ones	is there a case for further consideration of similar local policy coverage in the neighbourhood plan?
						Policy PP2 Hayle and St Ives CNA	
CS3	Provision of recycling collection facilities	✓		✓	✓	Policy 14 Development standards Policy 20 Strategic waste management principles Policy 21 Managing the provision of waste management facilities	Additional coverage in the neighbourhood plan is likely to be unnecessary.
CS4	Floodplains and areas at risk from flooding	✓		✓	✓	Policy 26 Flood risk management and coastal change Policy PP2 Hayle and St Ives CNA	Additional coverage in the neighbourhood plan is likely to be unnecessary.
CS5	Control of proposals affecting quality of groundwater	✓		✓	✓	Policy 14 Development standards	Additional coverage in the neighbourhood plan is likely to be unnecessary.

Policy No.	Name	currently saved?	proposed to remain saved when Local Plan adopted?	proposed to be replaced by the Local Plan when adopted?	proposed Local Plan policies replace the saved content?	which ones	is there a case for further consideration of similar local policy coverage in the neighbourhood plan?
CS6	Surface water disposal, rainwater harvesting and sustainable drainage systems	✓		✓	✓	Policy 26 Flood risk management and coastal change	Additional coverage in the neighbourhood plan is likely to be unnecessary.
CS8	Control of proposals for development which would affect watercourses or the coast, etc	✓		✓	✓	Policy 14 Development standards Policy 26 Flood risk management and coastal change	Additional coverage in the neighbourhood plan is likely to be unnecessary.
CS9	Renewable energy schemes	✓		✓	✓	Policy 15 Renewable and low carbon energy Policy 16 Safeguarding renewable energy Policy PP2 Hayle and St Ives CNA	Additional coverage in the neighbourhood plan is likely to be unnecessary.
CS10	Wind turbines or wind farms	✓		✓	✓	Policy 15 Renewable and	Additional coverage in the neighbourhood plan is likely to be

Policy No.	Name	currently saved?	proposed to remain saved when Local Plan adopted?	proposed to be replaced by the Local Plan when adopted?	proposed Local Plan policies replace the saved content?	which ones	is there a case for further consideration of similar local policy coverage in the neighbourhood plan?
						low carbon energy Policy 16 Safeguarding renewable energy	unnecessary.
CS11	Telecommunications equipment	✓		✓	×		While there is no specific reference to telecoms development schemes in the emerging Local Plan, it may not be necessary or desirable to develop policy coverage in the neighbourhood plan. Section 5 of the NPPF is particularly relevant.

For Appendix 2 which lists the saved policies of the Penwith Local Plan 2004, see separate file.