



The countryside charity
Cornwall

Cornwall **Matters** May 2025

CPRE Cornwall newsletter

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Trebah Garden

Here we are in May and our AGM is coming up on Wednesday 14th at the beautiful Trebah Garden near Constantine. We do hope you will come along and join us and meet our new Patron, Merlin Hanbury Tenison. It is always a pleasure to meet our members and to hear from them – ideas and feedback are especially welcome.

In this issue, we have another instalment of John Killick's in-depth analysis of how Cornwall Council are planning to respond to the government's housing policies. He explains the background and the detail of the current situation, and the risks we face as Cornwall Council's interim Policy Position Statement seeks to shore up the defences against more developments that are opportunistic and in the wrong places. His detailed work exposes the key issues and the dangers Cornwall faces.

Also in this issue, Martin Howlett gives us a trenchant piece of his mind about what farmers face from the Land Use Framework currently being developed to underpin the government's National Planning Policy Framework.

Once again, as we will be stressing at the AGM, we need to galvanise support in order to keep going. We need more members and of course we also need donations. We need people who can give a little bit of their time to join the committee or take on some volunteering to support our work. If you or anyone you know might possibly help, please do get in touch: admin@cprecornwall.org

AND A BIG THANK YOU FOR YOUR CONTINUING SUPPORT



Farm Land - up for grabs?

Martin Howlett

Ask any farmer what is their most valuable asset and the answer is inevitably: the land. Not as an asset for Mrs Reeves to tax as wealth or at sale disposal, but for its true value to the farm business – to grow crops, raise its livestock, look after nature and to ply our trade as generations have done before us.

Measured in terms of its potential agricultural production output and gauged by soil type, depth and quality, together with its aspect and topography, farmland is officially graded on a

scale of 1 to 5; with 1 and 2 being the most fertile land suitable for arable crops and field vegetable production, 3 to 4 grassland and 5 the poorest moorland. Cornwall is classified mostly grade 3 and 4 / 5.

Historically, as either landowners or tenants, we have worked with our given soils and their limitations, accepting in practise that we are but mere custodians and it is through good husbandry that we seek to improve it; we have a generational moral duty to hand on the land in a better condition than when we inherited.

However, in today's society, an ever-increasing demand for alternative land use beyond its primary agricultural purpose of food production to feed a growing population - estimated to be 73 million by 2030 - remains a real challenge to us all. The exponential urban sprawl into the countryside and its associated road and other network infrastructure to meet the government's 1.5 million target for new housing will, along with further expansion of ground-based solar arrays and wind turbines to meet the net-zero renewable energy commitment, each displace farmland usage from its current total of three-quarters of the land mass of the UK.

So, we welcome news of the launch by DEFRA of a National Land Use Framework (LUF). Quoted as a landmark moment, the creation of the LUF will provide decision makers with data intended to protect our most productive agricultural land - Grades 1 and 2 - boosting Britain's food security at a time of global uncertainty and changing climate. The LUF will hold similar legislative powers as those within the existing National Planning Policy Framework (NPPF). The twelve-week public consultation - dubbed a 'National Conversation' - that concluded at the end of April, aimed to address all aspects of land use in England, with an indication of up to 10% of lower grade areas of farmland then being dedicated to nature restoration, whilst still having 'British Food Security at its Heart'.

Striking the balance with an ever-shrinking land-bank - remember we do not make it any more - whilst incentivising the actual business landowners, plus attempting to meet the demands of a growing society living on a crowded island, remains the greatest challenge for us all as we move forward, 'Down on the Farm'



County Hall / Lys Kernow in Truro (Image: Cornwall Council)

PREPARING CORNWALL COUNCIL'S NEW LOCAL PLAN: THE INTERIM POLICY POSITION STATEMENT

John Killick

1: The Background

Cornwall Council has been working for several years on a new Local Plan to replace the Plan made in 2016 to cover 2010-2030. Since the last election however, the pressure has increased as the government desperately wants to kick start the British economy. Hence, their new National Planning Policy Framework (NPPF) raises Cornwall housing targets from 2,700 to 4,421 per year and requires the Council (CC) to make a new Local Plan as quickly as possible. This brief outline introduces the main arguments and documents, and then suggests some accessible sources to follow up.

Unfortunately, Plan-making is inevitably difficult and takes time. CC claims it ...'is one of the most important, exciting and challenging tasks that a Council can undertake.... the process is always contested, evolutionary and complex. It is in essence a giant negotiated compromise balancing many competing drivers....' (CC Growth Board Minutes, Dec. 2024).

Many Local Planning Authorities (LPAs) were far behind their old targets, though Cornwall was an exception. The government therefore decided to delay the start of new Plan-making nationally until August 2025 to make them easier and quicker to prepare. The government's new target became effective on March 12th, making Cornwall's current local planning system partly out of date and subject to the 'Presumption in favour of Sustainable Development' – a much looser rein on housebuilders, either until building meets the new targets or until a new Local Plan is agreed – hopefully by August 2028.

2. The Cornwall Interim Policy Position Statement

In the interim CC expects a deluge of unplanned speculative applications as developers test the water. Nationally, Government hopes the uncertainty will generally make LPAs act fast and get houses built, but locally, CC hopes to discipline developers through a Cornwall Interim Policy Position Statement (IPPS) of April 2025; CC hopes this will be a useful bridge between the previous plan and the next one.

3. Triage of the 2016 Local Plan strategic policies

First, the IPPS triages each policy in turn – choosing between policies which they think still have weight, are marginal. or are out of date.

Policy 2: Spatial Strategy – Effective – in line with NPPF.

Policy 2a: The old 52,500 houses target – Out of date.

Policy 3: Role and function of places – Part effective.

Policy 6: Housing Mix – Part effective

Policy 7: Housing in the country – Part effective

Policy 8: Affordable housing – Part effective.

Policy 9: Rural Exception Schemes – Part effective.

4. The spatial distribution of new housing

CC argues that Policy 2: Spatial Strategy, underlying the general pattern of dispersed development in Cornwall, is effective. They agree that Policy 2a - key targets - is out of date, but that Policy 3 - the numbers needed at each location, is still partly effective. They allow that numbers must rise overall, but as before they hope most new houses will go to major settlements and to larger villages with good amenities and transport. They hope smaller villages and the open countryside will remain relatively protected. Developers consulted on the IPPS often challenged these assessments, and CC either rebutted their comments or modified the IPPS: here is one example. **Red = the comment. Blue = CC's answer** (for source see note at the end)

Q: The IPPS undermines the delivery of homes. Policy 7 is preventing delivery. Increased weight must be given to the need to provide housing where it is needed, and can be provided even where that may be outside of defined settlement boundaries and in the open countryside. The approach in the IPPS to reiterate Policies 7 and 9 would be contrary to the presumption in favour of sustainable development which seeks to enable housing development to be provided as required, rather than placing blanket restrictions on certain locations.

CC answer: The wording of paragraph 84 of the NPPF is the same as it was on publication in 2012 and against which the CLP was examined and policy subsequently interpreted at multiple appeals. There has been no material change to the paragraph since 2012... As usual policies will be interpreted by decision makers, including any relevant material considerations. Action: No changes required in respect of this comment.

Para 84 of the NPPF says that ‘...policies and decisions should avoid the development of isolated homes in the countryside except under very specific listed provisions, e.g. houses for farm workers or heritage assets. This policy fits the situation in most of southern England where the predominant historical settlement pattern was composed of nucleated villages surrounded by extensive open countryside. It is therefore relatively clear - under NPPF rules - where extra development should, or should not, go.’

Cornwall, by contrast, developed historically a very dispersed settlement pattern not only including many small harbours and towns but also very large numbers of small hamlets or collections of farmhouses – called ‘Trevs’ – between the larger villages. The original towns, harbours and villages are being enormously expanded and the small settlements in between are so numerous in Cornwall that it would be unsustainable to use every farmstead or hamlet as an embryonic base for expansion. Some ‘Trevs’ have developed substantial tourist and other businesses – such as Trevaskis near Camborne – and for the time being have won planning applications against solar farms.

The Chief Planning Officer’s Advice Note: ‘Infill/Rounding Off’ helps decision makers choose whether a collection of houses is a settlement – or just a straggle of houses, but has nothing on the historical geography or Cornwall’s special quality in this respect. There is now a substantial literature – for instance, Historic England, Farmstead and Landscape Statement: Cornish Killas. (2020), which has good analysis, maps and pictures.

5. The quality of new development

The IPPS then lists CC strategies and policies – including the Cornwall Local Nature Recovery Strategy, the Climate Change Strategy, the Local Area Energy Plan, and the Infrastructure Delivery Plan, all of which have housing implications.

The consultation then produced this passage:

Q: The council is referring to emerging policies or strategies such as local energy systems, which give rise to viability concerns, that would ordinarily be considered through the examination process of the Local Plan.... We question the blanket conclusion that all policies in the Climate Change Delivery Plan Document (DPD) are green, particularly in light of the Written Ministerial Statement (WMS) of 2023 and the emerging evidence of the challenges to delivering Biodiversity net Gain (BNG), and the viability of housing more generally.

Another consultee quoted from the same WMS as follows:

‘The government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple local standards by LPA can add further costs to building new homes by adding

complexity and undermining economies of scale.

CC: The NPPF states that ‘...the planning system should support the transition to net zero by 2050’ [and] ‘should help to shape policies in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure’ (para 161) it adds that plans ‘...should take a proactive approach to mitigating and adapting to climate change’ (para 162).... Action: No change is required in respect of this comment.

Given the recent WMS it seems unlikely that CC will be able to deviate too far from national standards on energy – which although frustrating, might also limit developers’ cutting costs to improve viability.

6. Neighbourhood Development Plan policies

Cornwall’s Neighbourhood Plans are also affected by the increase in numbers and will likely lose the power to make:

A: Development boundaries which many NDP’s use to contain new development within existing built-up areas.

B: Locations and directions-of-growth rules with which many NDP’s stipulated their preferred areas.

C: Green buffers, aimed at preventing the coalescence of neighbouring settlements.

But some more qualitative policies will continue to have weight, such as Principal Residence policies, Design policies and Local Green spaces. For NDPs in National Landscapes – see Para 8 below.

NDPs that are nearly ready could be made using existing housing figures as long as they were submitted to CC by March 12th, 2025. It will still be possible to make new NDPs after March 12th, but enthusiasts are encouraged to wait until the new Local Plan is cleared, and in the interim to investigate making a Neighbourhood Planning Statement.

7. Neighbourhood Priority Statements (NPS)

In the longer run, an NPS will assess communities’ preferences and transfer them to CC for consideration and inclusion in the coming Local Plan. They will probably replace NDPs. They will be easier to make than NDPs, but will have no legislative power.

8. National Landscapes

The NPPF confirmed the existing protections for National Landscapes, and the IPPS only mentions them twice: ‘In general,’ CC writes, ‘larger, more complete settlements will be better able to support larger scale development. The exceptions to this are the smallest settlements and National Landscapes where development beyond infill and rounding off will be primarily through rural exception sites’. This seems to confirm not only the ongoing special treatment for National Landscapes, but also the continued relevance of NDP development boundaries in AONBs. We will address the special situation of National Landscapes in Cornwall in our next Newsletter.

9: Ensuring building happens: Fixing the industry

The IPPS recognises supplying extra housing requires a fundamental shift in capacity and delivery rates to ensure that already permitted homes are actually delivered. It commits CC to work with the industry to make sure they build the right houses, in the right places, in the right timescale. Larger sites should include a range of houses to meet the needs of all

income groups. House Building sites must provide the required infrastructure, be accessible, meet overall design standards and keep Cornwall distinctive.

10: Cornwall Planning and training sessions

The Cornwall Planning and Training pages contain summaries of Teams meetings, slides and Q&A sessions organised by CC planners such as Robert Lacey and Adam Birchall for local and Parish Councillors at several stages of the process, in September, November and December 2024 and January and February 2025. Here follows a very small sample of the Q&A sessions on January 25th and February 26th 2025 – paraphrased and re-arranged by topic. Councillors' questions in red and CC answers in blue.

On the need for new Local Plans and NDPs:

Q: Are NDPs made prior to 12th Dec 2019 i.e. over five years old – 'out of date'?

A: Yes – but not wholly - many qualitative policies will retain some force.

Q: Which 13 NDPs are still valid. Can we have a full list?

A: Here is a Link to the current List. We will provide a full list ASAP, or write to us.

On spatial distribution of developments:

Q: Since 2016 far more expensive houses have been built in attractive coastal areas, and too few in and around the main towns where they are needed.

A: This problem will be addressed in new Local Plan – due by August 2028. In the interim we have to rely on existing policies.

Q: In many areas of Cornwall NDPs were the only safeguard protecting scenic spots from million-pound houses, whilst providing affordable homes for locals. IF NDPs are invalid – how will this vicious circle be squared in future?

A: Other policies in the NDP will help with the balance of these cases.

On affordable housing:

Q: Will CC purchase land for Affordable Housing schemes? Market forces in second home hot spots will not provide homes under £500k?

A: CC – generally - does not have funds to do this – but we will work with partners such as registered providers or Community Land Trusts.

On infrastructure:

Q: It is all very well building all these new homes – but what about the infrastructure? When will these problems be considered? Treliske at breaking point. Energy....

A: Agreed. Will be in the IPPS. Also working on local area energy plan, and with National Grid.

Q: Need for education funding at all levels. And also for primary care – GP surgeries etc.

The amount given to local schools can't even pay for temporary classrooms. Also, where will new schools be put?

A: All levels of education, and primary care are already included. Many schools currently face declining rates - our education team monitors demographic indicators to plan new facilities.

On targets:

Q: We have delivered 60% over target? Will this count?

A: It is the whole CC LPA that has failed. Post pro-rata over-delivery is not a protection

Q: Will every parish have a new housing target as part of the Cornwall total?

A: No, the number is calculated at the Cornwall level because that is how we are judged.

11. Conclusion

The fascinating question posed by the IPPS is how far will it hold against developer pressure? Obviously, CC hopes that under the IPPS the main principles in the old Local Plan, *plus* substantial restraints in the new NPPF, will permit development in larger numbers, but in similar spatial and qualitative patterns as before. However, although CC has so far met its targets, it has been clear for some time that they could only be achieved by deviating substantially from critical spatial and quality aspects in the 2016 Plan – see our June and August 2024 Newsletters and comments in Para **10** above.

The new targets are now significantly higher. Robert Lacey, the author of CC's response to the NPPF Consultation, doubts that they will ever be met - see our Newsletter, March 2025. The crunch will come if market demand fails to meet them without further lowering IPPS spatial and quality standards, or alternatively, if CC faces expensive appeals against their decisions based on the IPPS - and on their reading of the NPPF.

Will CC then become more generally permissive in an attempt to meet the NPPF targets, or to avoid losing control? Our view is that this outcome is also unsustainable because it fails to protect our countryside - vital not only for its environmental but also for its economic and commercial value. It also fails to address the present housing shortage and may even exacerbate it - see our December Newsletter. CPRE should therefore continue attempting to educate the public and politicians in our Newsletters and making reasoned opposition to the worst proposals. A new study due shortly by Professor Malcolm Williams of the Institute of Cornish Studies at Exeter University on the housing problem, should also help.

Note on the main Cornwall Council sources:

Since this is a complex subject and the IPPS is sometimes difficult to read we have gone further than usual in providing access to the underlying sources, some of which are very useful.

The current NPPF of Dec 2024 and the IPPS of April 2025 can also easily be found on national and CC websites.

The IPPS Appendix B: Conformity of Policies of the Development Plan, 5pp, provides a useful grid summary of CCs view of the continuing weight of all 28 CC Local Plan Policies. Red – shows ineffective – two policies: Amber – part effective – 8 policies, and Green effective – 18 policies.

CC Growth and Development Committees:

The Minutes of the Cornwall Growth Board – CC-GB - and the Economic Growth and Development Overview and Scrutiny Committee CC-EGDC - both found on the Cornwall Democracy Website pages are the easiest way into the detail of the IPPS, and often provide fuller and more interesting detail than the IPPS itself. Also useful are the Cornwall Council Planning and Training Sessions - see Section 10 above.

CC-GB Minutes. Dec 2024. Agenda Item 4; Local Plan Interim Report, pp.3-218. Reports progress on Local Plan to Dec 12th, the day the government published its new NPPF.

CC-GB Minutes. March 2025. Agenda Item 6: Local Plan Update has:

1: Appendix 1: Final draft of IPPS showing Changes made as a result of the Consultation – reveals developer and other comments. Pp. 99-120.

2: Appendix 2: Summary of comments on the IPPS – usefully showing developer and other comments. Pp.136-149.

CC- EGDS Minutes. Jan 2025. Contains long informative minutes on preparing the new Local Plan and the IPPS, and several appendices explaining how to launch NPSs - Pilot

Schemes, model templates, worked examples etc.

B. Cornwall Neighbourhood Planning Pages:

News and Updates pages contain 'Neighbourhood Planning Newsletters'. Those for Nov 2024 and Jan 2025 outline in simple terms the expected and final NPPF changes, and how the new NPSs will work. In addition, there are:

- 1: A list of the 13 'NDPs that have additional protection under paragraph 14 of the NPPF', with some explanatory details on each.
- 2: Two briefing guides, 'National Planning changes and NDPs' explaining how NDPs by age will be affected, and 'National Planning changes and Neighbourhood Plans', January 2025 with details of the policies likely to retain protection.

Planning Update



Pendower Beach

This planning application was refused on 25 March 2025

PA24/ 00042 Pendower Beach House Hotel, Rocky Lane, Ruan High Lanes.

Demolition of part of the existing buildings, conversion of part of the existing hotel building, erection of 3 replacement open market residential dwellings a 20 unit apartment hotel, 2 key workers units and a restaurant/shop.

CPRE Cornwall has opposed several planning applications for this site and continues to support Friends of Pendower Beach in their campaign to promote the conservation, protection and improvement of the physical and natural environment of Pendower Beach and its environs, designated as part of the Cornwall National Landscape.

The application was refused for the following key reasons:

The proposed development constitutes 'major development' on a highly sensitive site within the Cornwall National Landscape and Heritage Coast, which by reason of its layout, density, scale, massing, and design, the engineering works to Rocky Lane, together with increased light pollution and localised skyglow in this currently largely dark environment would result in unacceptable harm to the landscape and scenic beauty of the Cornwall National Landscape and unacceptable harm to the special character of the Heritage Coast, and it would fail to conserve and enhance the landscape character and natural beauty of the Cornwall National Landscape

The proposed development would encroach into the Pennarin Point to Portscatho County Wildlife Site (CWS) resulting in a loss of habitat within the CWS. The need for the development and the public benefits that the development would deliver are not considered to clearly outweigh the harm to the CWS that would result from the habitat loss within the CWS.

The application has failed to demonstrate that the required minimum 10% net gain in biodiversity has been achieved.

Therefore the proposed development is contrary to Policies 1, 2, 3, 12 and 23 of the Cornwall Local Plan Strategic Policies 2010-2030, Policy C1 and G2 of the Climate Emergency Development Plan Document - February 2023, Policies LA1, LA2, LA5, GP1, GP2 and CD1 of the Roseland Neighbourhood Development Plan 2015-2030, advice in paragraphs 8, 135, 187, 189, 190, 191, 193 and 198 of the National Planning Policy Framework December 2024, and Policies PD-P1, PD-P2, PD-P3, PD-P4, PD-P8, PD-P11 and PD-P20 of the Cornwall Area of Outstanding Natural Beauty Management Plan 2022-2027.

Recent Decisions

Boat Cove Lane, Perranuthnoe Replacement Chalet Planning application PA25/00680 REFUSED	Chapel Street, Penzance Demolition of a listed building Planning application PA24/08901 REFUSED
Pendower Beach Hotel Aparthotel and 3 dwellings Planning application PA24/00042 REFUSED	APP/3349687 (PA24/00716) St Hilary Permission in principle up to 9 dwellings DISMISSED

Objections submitted to Cornwall Council – awaiting decision

Shute Hill, Breage Residential development Planning application PA23/09456	Cold Northcott Wind Farm Repowering of wind farm and extension Planning application PA23/02727
Penhale Camp, Holywell Bay 9 dwellings and 3 refurbished dwellings Planning application PA22/02794	Halgavor Moor Development of up to 540 dwellings planning application PA20/10618
Panderosa Farm, Bodmin 58 dwellings Planning application PA23/07573	

Appeals awaiting decision

APP/3353157 (PA22/10184) Trelissick Gardens 225 space car park	APP/3359104 (PA24/04886) Boat Cove Lane, Perranuthnoe Construction of a chalet
APP/3354275 (PA22/11311) Trewidden Road, St Ives Construction of a Premier Inn	APP/3352494 (PA 23/02502) Gillyflower Golf Club Clubhouse, 19 lodges
APP/3352891 (PA23/05034) Pengelly, Bosavern Construction of a pond	