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Our ref: 9383

Camelford Town Council Town Hall Market Place Camelford PL32 9PD

11 July 2019

Dear Amanda

CAMELFORD NEIGHBOURHOOD PLAN - Draft Neighbourhood Plan (Regulation 14) Consultation

I write on behalf of my client, Poltair Homes, who have asked us to submit comments in response to Camelford Neighbourhood Development Plan's Regulation 14 consultation. As you will be aware, Poltair Homes have previously delivered the Beechwood Drive development in Camelford.

Whilst Poltair Homes are broadly supportive of the Neighbourhood Plan being prepared for Camelford they are concerned draft housing policy 1B (affordable homes) as set out in the current version of the plan.

It is our view that draft Policy 1B, which is concerned with the provision of affordable homes at Camelford and is intended to be read in conjunction with Policy 9 of the Cornwall Local Plan, is too prescriptive. It is stated in the draft version of the plan that the intention is to:

"...clearly define a region of search where exception site development of at least 50% affordable housing will be supported outside of the Development Boundary (See Map M4).

Draft Policy 1B then contains a specific criteria (G) that restricts development to this defined area of search. This level of prescription is unnecessary and conflicts with policy 9 of the Cornwall Local Plan, and indeed national planning policy (paragraph 77 of the National planning Policy Framework 2019 [NPPF]). As set out at paragraph 13 of the NPPF:

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"Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies."

The policy as worded does not effectively support the strategic policy of the Cornwall Local Plan (CLP) (namely policy 9) and should also be focusing on shaping and directing development that is not covered by these strategic policies (to avoid duplication).

Policy 9 of the CLP is supportive of development proposals on sites outside of but adjacent to the existing built up area of a settlement and where the development would be well related to the physical form of the settlement. Therefore, in principle, Policy 9 allows consideration of all sites and land that adjoin settlement boundaries and built form.

The current policy effectively provides an allocation for future affordable housing, and by restricting this form of development to a specific location, the NDP seems to be in breach of CLP Policy 9.

We would suggest that Policy 1B of the NPD should provide flexibility to bring forward rural exceptions schemes (including entry-level exception sites), and applications for such should be treated on a case by case basis and on their merits at the time of determination.

We suggest that the policy should either be re-worded removing reference to the area of search so that it encourages rural exception sites on suitable land adjacent to the existing built up area of Camelford (as reflected in policy 9 of the CLP); or that it should be omitted from the plan (on the basis that policy 9 of the CLP and the NPPF already provides an adequate policy framework).

I trust these comments will be considered in preparing the submission version of the plan. If you require any further information or have any questions, please do not hesitate to contact me.

Yours faithfully BELL CORNWELL LLP

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