



# Consultation Statement.

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## **2. INTRODUCTION**

### **2.1 Legal Obligations**

This Consultation Statement (The Statement) has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012 relating to Cubert Neighbourhood Development Plan (CNDP).

The legal basis of this Consultation Statement is provided by Section 15(2) of Part 5 of the Neighbourhood Planning Regulations 2012, which requires that a consultation statement should:

Contain details of the persons and bodies who were consulted about the proposed neighbourhood development plan,  
Explain how they were consulted,  
Summarise the main issues and concerns raised by the persons consulted,  
Describe how these issues and concerns have been considered and, where relevant addressed in the proposed neighbourhood development plan.

### **2.2 Purpose of the Consultation Statement**

This statement seeks to both fulfil the legal obligations, to clearly set out how the consultation and engagement elements of the CNDP were undertaken and how these processes influenced the content.

To further explain this, The Statement, includes:

Representation of the geographical area involved.

The background from which the CNDP was developed.

How the CNDP Steering Group was constituted.

Details of the consultation process.

Responses deriving from those consultations.

Action in the form of policy development.

Examples of consultation administration.

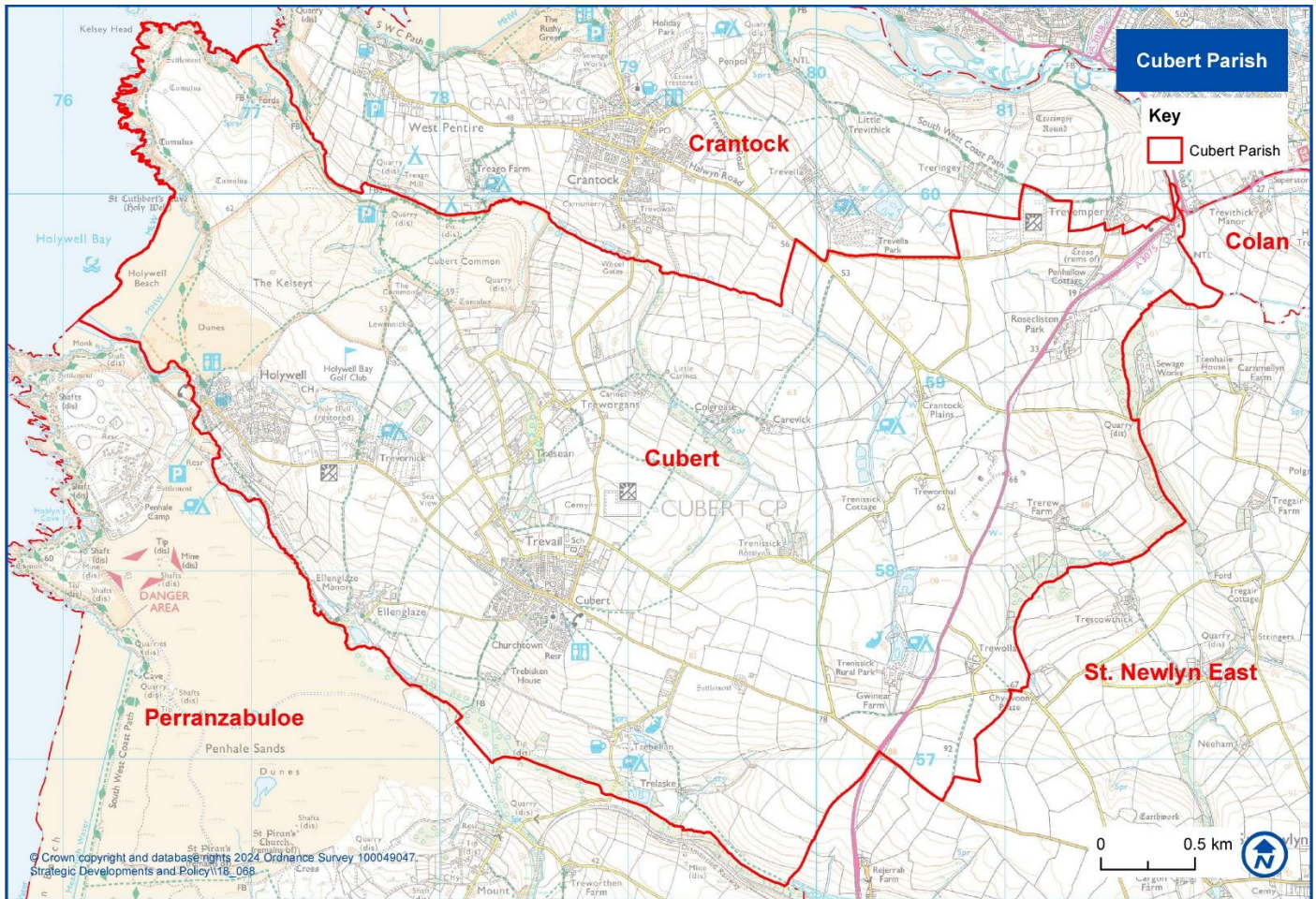
The timeline of the consultation process.

### **2.3 Cubert NDP designation**

The original designation for the CNDP was approved by Cornwall Council in January 2019 via planning application PA19/00001/NDP. However a modified application was necessary following a county wide boundary Governance Review allowing a minor alteration to the Cubert Civil Parish and the Crantock Civil Parish boundaries in 2022. (An area of field passed from Cubert parish to Crantock parish).

A revised CNDP application (to include the removal of the area of field) was approved by Cornwall Council in February 2024 via planning application PA24/00008/NDP, reflecting that change. The designated boundary for CNDP corresponds to the Cubert Civil Parish boundary that was approved by Cornwall Council in February 2024 is represented by the map below.

Formal responses to the planning application(s) were received by Cornwall Council from Affordable Housing, Historic England, Natural England, National Grid, South West Water, Highways England, and the Environmental Agency. All replies were either Support, No Objection, or No Comment, with basic requests for conformity with regulations and practices, and included offers of assistance where necessary (respondee were awaiting fuller details of the NDP document(s)). The applications, approvals, and replies received are available via Cornwall Council Planning Portal at [www.cornwall.gov.uk](http://www.cornwall.gov.uk) using the application numbers shown above.



### 3. BACKGROUND

It is over a decade now since the Localism Act sought to facilitate the devolution of decision-making powers from central government control to individuals and communities. It was envisaged that one of the means by which the decentralisation concept could be realised was the creation of Neighbourhood Development Plans.

#### 3.1. Constitution of the CNDP Steering Group (CNDP SG)

Following the approval of the designated NDP area, a call for volunteer residents was made via the monthly parish Newsletter (delivered each month to all Cubert Parish residential properties), and a number of residents subsequently joined members of the Parish Council to form a Steering Group (SG). The Group (always including both Chair and Vice-Chair of the Parish Council) continued as a mix of parish councillors and residents throughout the CNDP stages to completion. The role of Chair initially being with the Chairman of the Parish Council during set up of the Group but, with the deliberate intention of ensuring openness and inclusion, the CNDP Steering Group Chair has been taken up by other resident members within the Steering Group from those early stages.

The early meetings of the group were focused on administrative necessities such as terms of reference, codes of conduct, sub-group delegations etc. That done, it was agreed that the NDP must be predicated on the wishes of parish residents while taking cognisance of national and regional development strategies.

The Terms of Reference (5 August 2019) and dates of meetings for the Steering Group are at [Appendix 1](#).

To maximise the openness and transparency of the exercise a communication strategy was agreed by which collection and dissemination of information would be managed via the Parish Newsletter, a Cubert NDP internet website, and a Cubert NDP Facebook page together with public meetings.

## **4. DETAILS OF THE CONSULTATION PROCESS**

### **4.1. Overview**

Having agreed that primacy must be given to the views of residents of the Parish, it was recognised that there were many organisations that, while not located within the geographical area, undertook activities that potentially impacted directly onto the community.

With this in mind, an initial two-pronged process was adopted.

Firstly, in June 2021 a questionnaire was created for the residents and a paper version was distributed to every home in the parish. The support of local schools was secured to ensure that the opinion of children and adolescents was included in the collection process. Over and above this, an electronic version was made available on the website. The survey results are included in section 4.2 below.

Secondly, the organisations identified were contacted, advised of the commencement of the NDP process and given the opportunity, from the outset, to contribute to process ([Appendix 2](#)). At the same time, local stakeholders (businesses and landowners/users operating in the Parish) and developers were contacted by email letter and invited to comment and submit their views on the survey results ([see Appendix 3, Letter to Stakeholders and Letter to Developers](#)).

Following the response received from this initial consultation, further specific topic consultation was initiated, using the monthly Newsletter, the CNDP website and email-outs.

A public exhibition consultation exercise to inform parishioners and stakeholders was held on November 13<sup>th</sup>, 2021, in Cubert Village Hall with 87 attendees.

On the 9<sup>th</sup> September, 2023, a further exhibition to update parishioners and stakeholders on the progress made in the preparation of the Cubert NDP was held at Cubert Village Hall with 19 attendees.

A final public exhibition, to present the final draft Cubert NDP and the Cubert Design Guide to parishioners and stakeholders followed in 12<sup>th</sup> October 2024 as part of the Regulation 14 consultation process and was held in the Beacon of Light Chapel, Cubert with 24 attendees.

### **4.2. Details/Response to the initial survey questionnaire.**

Analysis of the questionnaire identified six main issues of concern to the respondents.

- Priorities for new housing
- Future business development in the parish
- Traffic control and car parking.
- Protecting our heritage assets and green spaces
- Safeguarding our school facilities and potential expansion needs
- Provision of sports and leisure facilities.

(A breakdown of the questionnaire replies is shown at [Appendix 4](#))

In July 2020 the Steering Group reviewed these six main topics, and how the CNDP could be progressed in view of the (then current) Covid pandemic restrictions.

It was quickly established that the provision of school facilities was exclusively the remit of the County Council and was beyond the influence of an NDP. Focus became concentrated on the five remaining topics.

The Steering Group felt that the best method of advancing the new housing priorities would be via a public meeting. However, because of the Covid-19 pandemic restrictions, this would prove impractical and an exhibition was deferred.

Traffic Control and Car Parking research was carried out and an initial assessment produced.

A Local Landscape Analysis was commenced to assess the protection of heritage assets and green spaces, utilising third party advisors and additional local volunteers. A comprehensive reference document resulted and was published on the Cubert NDP website ([www.cubertndp.co.uk](http://www.cubertndp.co.uk)).

A second questionnaire was circulated on the provision of sports and leisure facilities.

Because of the limitations invoked by governmental Covid-19 protocols and to try and avoid “questionnaire fatigue” it was also decided to refine the initial survey responses with specific questionnaires circulated monthly via the Cubert Newsletter, Facebook and Cubert NDP website.

The above processes were time consuming, but without the ability of a public exhibition/consultation due to the Covid restrictions, it at least gave the Steering Group the opportunity to progress some of the main topics until such time as a more useful public exhibition could be held.

#### **4.3. Details/Response to the first public exhibition.**

On the 13<sup>th</sup> November 2021, following the cessation of Covid restrictions, a public consultation and exhibition was held in Cubert Village Hall. Advance notice of the exhibition was made via a Newsletter advert (delivered to all residential homes and businesses) and lamppost notices. Displays relating to each of the priority areas were on show along with Q&A sessions with Steering Group members.

Eighty-seven parishioners attended and, via topic-specific displays, were able to review the information collected to date, and to add their views as they saw fit. The information collected was used to supplement responses already acquired from the topic specific questions made in the preceding (Covid) months.

The exhibition was the first time since the initial survey that residents were given the opportunity to view the Future Housing Development topic, and be able to qualify and or clarify their priorities in this area of review. Annotated maps showing the existing areas of development were provided and people were asked a series of questions relating to housing development based on the maps.

A breakdown of the replies, along with the proposed NDP Policy topics from the exhibition are at [Appendix 5](#).

Overarching this process, invitations were resent to various county, regional and national organisations, whose strategic business policies, it was thought, might well influence the content of the NDP. In the event, most responses were “auto-replies”, and no positive information was forthcoming from the exercise ([Appendix 2](#)).

In December 2021 a synopsis of the work undertaken to that point was that *“the exhibition held on the 13th of November represented the culmination of that review and afforded the residents of Cubert the opportunity to have oversight of the results and provide informed comment for us to take into the next stage of the process; the composition of a draft NDP document”*.

The initial information collection exercise having been completed the SG focused on the composition of the NDP document that would ultimately be put to a public referendum.

#### 4.4. Details/Response to the second public exhibition.

On September 9<sup>th</sup>, 2023 a second public exhibition was held in Cubert Village Hall and the draft NDP presented for public scrutiny. 19 parishioners and stakeholders attended the exhibition and 10 questionnaires/feedback forms were completed and returned. A copy of the Pre-Submission Consultation information leaflet (including the Steering Groups Vision Statement for the NDP) together with a summary of the return results is included at [Appendix 6](#).

The exhibition enabled the Steering Group to refine the NDP to a position where they were able to instigate the “pre-submission consultation process” in accordance with Regulation 14 of the Neighbourhood Plan Regulations.

#### 4.5. Details/Response to the third (Regulation 14) public exhibition .

As part of the Regulation 14 consultation process, the Cubert NDP SG held an exhibition/Q&A event in the Beacon of Light Community Church, Cubert on 12<sup>th</sup> October 2024. The event was advertised with physical posters displayed in prominent locations within the parish, an event notice included within the parish newsletter (the Cubert News) together with signposting on the Cubert NDP website and Facebook page. A copy of the physical poster and the notice in the parish newsletter are included at [Appendix 7](#).

As with the previous event, the proposed policies, aims and objectives together with the rationale that led to them, were on display. 24 parishioners attended and their names, postcodes and signatures recorded. Reply and comment slips were provided but no written responses were received although some attendees gave verbal feedback to Steering Group members. A summary of the verbal comments and feedback received at the public exhibition are included in the table below.

#### Verbal Comments and Feedback from Parishioners at Regulation 14 Exhibition (12<sup>th</sup> October, 2024).

Topic	Comment Made	NDP Response/action
Policy HGS2: Local Green Spaces	I think the designation of the seven areas of Local Green Space within Cubert is a great idea. Without this protection, they would probably all be sprouting chimney pots soon. Cubert needs areas of green space within it.	Noted and thank you. The plan addresses this issue.
Policy HO3: Preventing Coalescence	The presence of Cubert as the main village with the separate hamlets of Trevail, Tresean and Treworgans to the north is an important characteristic of the parish which we don't want to lose.	Noted and thank you. The plan addresses this issue.
Policy HO1: Development Boundaries	We realise that Cubert as a settlement is likely to grow in size in terms of house numbers in the future. What we (and many people in the village we talk to) want to see is the right housing in the right place.	Policy HO1 has been drafted to help achieve this.
Cubert Design Guide	All too often, there seems to be little attention paid to appropriate and sympathetic design. We applaud the preparation and inclusion of the Cubert Design Guide	Noted and thank you. We think it important too.
Overall	There is nothing in the draft NDP about Cubert School?	We did consider educational provision in the early stages of NDP preparing but have been

		advised this is not a planning matter and does not fall within the remit of an NDP.
Overall	Very well constructed plan, pro-Cubert and with the aim of allowing the community a voice in the future development of the parish. Well done.	Noted and thank you.

In tandem with this exercise, details of the public exhibition and signposting to the draft Cubert NDP and Design Guide were provided to the pre-requisite statutory consultees as well as additional non-statutory organisations and supplementary organisations that it was considered may want to contribute to the exercise was undertaken (Appendix 2).

In addition, publicising the plan to those who live, work or run businesses within the Parish was achieved via the CNDP website, the Facebook platform, public notices and a circular produced by the Parish Council.

The consistent response to each of the public events was one of positivity and it was significant that the priorities identified from the initial questionnaire remained constant throughout the process.

#### 4.6. Regulation 14 Consultation

The statutory Regulation 14 consultation period ran from 9<sup>th</sup> September, 2024 to 28<sup>th</sup> October, 2024. Ninety-seven organisations (both statutory and non-statutory consultees) were contacted by email on September 6<sup>th</sup>, 2024 and informed of the consultation process, the consultation period, the date and timing of the public exhibition together with signposting to the draft CNDP and Cubert Design Guide on the Cubert NDP website (<https://www.cubertndp.co.uk>). The email addresses of organisations contacted as part of the Regulation 14 consultation period are included in Appendix 2.

Most of the organisations that responded, did so with auto-reply or pre-prepared emails. Fourteen organisations responded to the Regulation 14 email communications with constructive comments and these responses were reviewed and considered as appropriate (Appendix 8) with any resulting amendments to the draft Cubert NPD being made, as detailed in the blue type in Appendix 8.

**Appendix 1:** NDP Steering Group Terms of Reference and meeting dates.

Cubert Neighbourhood Development Plan Steering Group - Terms of Reference: 5 August 2019

**1. Purpose**

- a. The main purpose of the Cubert Steering Group is to oversee the preparation of the Neighbourhood Plan for Cubert Parish in order that these will then progress to Independent Examination and a successful community referendum and ultimately be adopted by Cornwall Council to become planning policy.
- b. The Steering Group will engage the local community to ensure that the Plan is truly representative of the ambitions of Cubert Parish. The Group will maximise support for the approach taken in the Neighbourhood Plan by ensuring high levels of community engagement throughout the plan-making process.

**2. Principles**

- a. That the Steering Group will undertake the process in a democratic, transparent and fair fashion, encouraging widespread participation and giving equal consideration to opinions and ideas from all members of the community.
- b. All decisions made shall be fully evidenced and supported through consultation with the local community.

**3. Roles and Responsibilities**

In order to achieve this, the Steering Group will carry out the following roles:

- Be accountable for steering and providing strategic management of the Neighbourhood Plan for Cubert Parish;
- Produce, monitor and update a project timetable;
- Produce a consultation and engagement strategy, showing how the public will be involved throughout the process;
- Regularly report back to the Parish Council for endorsement of decisions taken;
- To undertake analysis and evidence gathering to support the plan production process;
- Actively support and promote the preparation of the Cubert Neighbourhood Development Plan throughout the duration of the project;
- Identify sources of funding;
- Liaise with relevant authorities and organisations to make the plan as effective as possible;
- Gather data from a wide range of sources to ensure that the conclusions reached are fully evidenced and that the aspirations and issues of all residents are understood;
- Consult as widely and thoroughly as is possible to ensure that the draft and final NDP is representative of the views of residents;
- Agree, subject to ratification by the Parish Council, a final submission version of the Cubert Neighbourhood Development Plan;

**4. Membership**

- a. The Steering Group will be made up of a cross-section of volunteers from the community, including Parish Councillors. Effort will be made to seek representation from under-represented sections of the community.
- b. Membership of the Steering Group will be open to the public indefinitely, up to a maximum of 20 members.
- c. Residency – All members of the Steering Group will at all times reside permanently within Cubert Parish.

(The last amendment to the Terms of Reference was made during the NDP Steering Group meeting of 5 August 2019 which increased the maximum members (4.b) from 15 to 20, and changed the wording at (4.c) to “will at all times”.

Dates of NDP Steering Group meetings.

2019	2020	2021	2022	2023	2024	2025
5 Aug	6 Jan	1 Feb	10 Jan	6 Feb	20 May	8 Jan
2 Sep	3 Feb	1 Mar	7 Feb	6 Mar	19 Aug	18 Feb
7 Oct	30 Mar	5 Apr	7 Mar	12 Jun	7 Oct	
4 Nov	4 May	10 May	4 Apr	7 Aug	12 Oct	
9 Dec	1 Jun	7 Jun	9 May	2 Oct	6 Nov	
	6 Jul	5 Jul	6 Jun	6 Nov		
	3 Aug	2 Aug	4 Jul			
	7 Sep	6 Sep	1 Aug			
	5 Oct	4 Oct	5 Sep			
	2 Nov	1 Nov	3 Oct			
	7 Dec	6 Dec				

2026  
15 Jan

**APPENDIX 2: Formal organisations consulted (including statutory and non-statutory Regulation 14 consultees)**

Colan Parish Council	colanpcclerk@gmail.com
Crantock Parish Council	clerk@crantock-pc.org.uk
Perranzabuloe Parish Council	clerk@perranzabuloe-pc.gov.uk
St Newly Easy Parish Council	clerk@stnewlyeast-pc.org.uk
Newquay Town Council	office@newquay.town
Cornwall Council	neighbourplanning@cornwall.gov.uk
Civil Aviation Authority	windfarms@caa.co.uk
Coal Authority - HMG	planningconsultations@coal.gov.uk
Cornerstone Telecom Infrastructure Ltd	emf.enquiries@ctil.co.uk
EDF Energy	newconnections@edfenergy.com
EE	public.affairs@ee.co.uk
Environment Agency	SPDC@environment-agency.gov.uk
Healthwatch Cornwall	enquiries@healthwatchcornwall.co.uk
Highways England	gaynor.gallacher@highswayengland.co.uk
Historic England	e-swest@HistoricEngland.org.uk
Homes England - HMG	enquiries@homesengland.gov.uk
Hutchison 3G UK Ltd	jane.evans@three.co.uk
Kernow Health	primarycare.kernow@nhs.net
Marine Management Organisation	marine.consents@marinemangement.org.uk
National Grid (AMEC)	n.grid@amec.com
National Grid (Avison Young - UK)	nationalgrid.uk@avisonyoung.com
Natural England	consultations@naturalengland.org.uk
Network Rail	townplanningwestern@networkrail.co.uk
Ofcom	spectrum.licensing@ofcom.org.uk
Openreach	nnhc@openreach.co.uk
Royal Cornwall Hospital Trust	garth.davies@rhch.cornwall.nhs.uk
South West Water	developerservicesplanning@southwestwater.co.uk
Western Power	wdpnewsupplies@westernpower.co.uk
Adult Care	adultcare@cornwall.gov.uk
British Legion	info@britishlegion.org.uk
Confederation of Women's Institutes	cfwi@btconnect.com
Cormac Ltd	countryside@cormacltd.co.uk
Cornwall Council	healthy.cornwall@cornwall.gov.uk
Cornwall National Landscape	info@cornwall-aonb.gov.uk
Cornwall Young Famers	office@cornwallyfc.co.uk
Falmouth Neighbourhood Plan	admin@rclproject.com
Kings Fund	enquiry@kingsfund.org.uk
National Trust	sw.customerenquiries@nationaltrust.org.uk
Sport England	planning.south@sportengland.org
Transport for Cornwall	ask@gocornwallbus.co.uk

Community Energy Plus	enquiries@cep.org.uk
Cornerstone Network	EMF.Enquiries@ctil.co.uk
Cornwall Council	affordablehousing@cornwall.gov.uk
Cornwall Buildings Preservation Trust	cbptrust@gmail.com
Cornwall Council	admin@rclproject.com
Cornwall Council	economicdevelopment@cornwall.gov.uk
Cornwall Council	fire@cornwall.gov.uk
Cornwall Council	maritimestrategy@cornwall.gov.uk
Cornwall Council	neighbourhoodplanning@cornwall.gov.uk
Cornwall AONB	planning@cornwall-aonb.gov.uk
Cornwall Heritage Trust	cornwallheritagetrust@gmail.com
Cornwall & IoS Local Enterprise Trust	info@cioslep.com
Cornwall National Landscape	info@cornwall-aonb.gov.uk
Cornwall Rural Community Charity	admin@cornwallrcc.org.uk
Cornwall Wildlife Trust	planning@cornwallwildlifetrust.org.uk
Cornwall Association of Local Councils	enquiries@cornwallalc.org.uk
Devon and Cornwall Police	martim.mumford@devonandcornwall.pnn.police.uk
Duchy of Cornwall	western@duchyofcornwall.org
Duchy of Cornwall	lhumphries@duchyofcornwall.org
Forestry Commission	PeterDevonport@forestrycommission.gov.uk
Gilbert & Goode	mail@gilbertandgoode.co.uk
Great Western Railway	gwr.feedback@gwr.com
Imerys Minerals UK Ltd	peter.larwood@imerys.com
Live West	katie.slack@livewest.com
Ministry of Defence	DIO-Safeguarding-statutory@mod.gov.uk
National Farmers Union	south.west@nfu.org.uk
National Federation of Gypsy Liaison	info@nationalgypsytravellerfederation.org
RSPB	rspscornwallgroup@gmail.com
Sustrans	south@sustrans.org.uk
Tamar Valley National Landscape	planning@tamarvalley.org.uk

British Horse Society Access Cornwall	bhsaccesscornwall@btinternet.com
British Gas	customerservices@britishgas.co.uk
Campaign to Protect Rural England (CPRE)	info@cpre.org.uk
Coastline Housing	customer.sevices@coastlinehousing.co.uk
Community Energy Plus	advice@cep.org.uk
Cormac	customerrelations@cormacltd.co.uk
Cornwall Affordable Housing Team	affordablehousing@cornwall.gov.uk
Cornwall Area of Outstanding Natural Beauty (AONB)	info@cornwall-aonb.gov.uk
Cornwall Association of Local Council's	enquiries@cornwallalc.org.uk
Cornwall Business Intelligence Team	intelligence@cornwall.gov.uk
Cornwall Buildings Preservation Trust	cbptrust@gmail.com
Cornwall Chamber of Commerce & Industry	hello@cornwallchamber.co.uk
Cornwall, Children, Schools and Families	children@cornwall.gov.uk
Cornwall Council Adult Care Services	adultcare@cornwall.gov.uk
Cornwall Council Countryside Services	countryside@cormacltd.co.uk
Cornwall County Farms Service	councilfarms@cornwall.gov.uk
Cornwall Economic Development	economicdevelopment@cornwall.gov.uk
Cornwall Federation of Small Businesses	hello@cornwallchamber.co.uk
Cornwall Federation of Women's Institute	cfwi@btconnect.com
Cornwall Federation of Young Farmers	office@cornwallyfc.co.uk
Cornwall Fire and Rescue Service	fire@cornwall.gov.uk
Cornwall Health Promotions Service	healthy.cornwall@cornwall.gov.uk
Cornwall Heritage Trust	cornwallheritagetrust@gmail.com
Cornwall Housing Ltd	info@cornwallhousing.org.uk
Cornwall Planning	planning@cornwall.gov.uk
Cornwall Playing Fields Association	info@cornwallcpfa.org.uk
Cornwall NHS Partnership Trust	cpn-tr.Enquiries@nhs.net
Cornwall Rural Community Council	info@cornwallrcc.org.uk
Cornwall Transportation	ask@gocornwallbus.co.uk
Cornwall Wildlife Trust	info@cornwallwildlifetrust.org.uk
Disability Cornwall	info@disabilitycornwall.org.uk
EDF Energy	customercorrespondence@edfenergy.com
English Heritage	<a href="mailto:e-swest@historicensland.org.uk">e-swest@historicensland.org.uk</a>
Environment Agency	enquiries@environment-agency.gov.uk
Health and Wellbeing Board	<a href="mailto:enquiry@kingsfund.org.uk">enquiry@kingsfund.org.uk</a>
Healthwatch Cornwall	enquiries@healthwatchcornwall.co.uk
Highways England	info@highwaysengland.co.uk
Homes and Communities Agency	mail@homesandcommunities.co.uk
Locality	info@locality.org.uk
National Grid	n.grid@amec.com
National Trust	enquiries@nationaltrust.org.uk
Natural England	enquiries@naturalengland.org.uk
Ocean Housing Cornwall	help@oceanhousing.com
Office of the Police Commissioner	opcc@dc.police.uk
Parkdean Resorts	parkdeanresorts@fcs.co.uk
Ramblers Association	ramblers@ramblers.org.uk
Rural Community Link Project	admin@rclproject.com
Southwest Water	customercontact@southwestwater.co.uk
Sport England	funding@sportengland.org
Wales and West Utilities Limited	enquiries@wwutilities.co.uk
Western Power Distribution	wpdcontactcentre@westernpower.co.uk
Young People Cornwall	kates@ypc.org.uk

Appendix 3: Letter to Stakeholders and Letter to Developers



Pengoon, Treguth Close, Holywell Bay, Newquay, TR8  
5DD

**01637 830947**

[info@cubertndp.co.uk](mailto:info@cubertndp.co.uk)

[www.cubertndp.co.uk](http://www.cubertndp.co.uk)

1<sup>st</sup> September, 2020

Dear Sir/Madam

I am writing on behalf of the Steering Group involved in the composition of a Neighborhood Development Plan (NDP) for the Parish of Cubert in Cornwall.

NDP's, while locally focused, are subject to predetermined processes and oversight at local, regional and national levels. Part of this process is to contact potential stakeholders, whose business or organisational interests may have an impact on the Parish at the various levels and provide them with opportunity to contribute to the NDP.

A potential stakeholder comes from a broad spectrum of individuals, businesses and organisations e.g. landowner, business owner, property developer, utility supplier, charity, or government department and hence this contact with you.

We would like to invite you, as a potential stakeholder, to view the results of our initial survey of residents within the Parish, which is available online at [www.cubertndp.co.uk](http://www.cubertndp.co.uk).

We would also ask you to submit your views on the survey results together with any questions or other personal observations regarding your vision or needs for the future, as far as they may impact Cubert over the forthcoming years.

You may submit your input to the plan by email at [info@cubertndp.co.uk](mailto:info@cubertndp.co.uk), or in writing to c/o The Clerk, Cubert Parish Council, Pengoon, Treguth Close, Holywell Bay, Cubert TR8 5DD. We would appreciate replies to be submitted by 30th October 2020.

We do hope that you can find the time to take part in this process, as it will be invaluable in shaping the future of Cubert Parish as a whole.

Yours faithfully

Michael Crisp  
Chairman  
Cubert Neighborhood Development Plan



Pengoon, Treguth Close, Holywell Bay, Newquay, TR8  
5DD

**01637 830947**

[info@cubertndp.co.uk](mailto:info@cubertndp.co.uk)

[www.cubertndp.co.uk](http://www.cubertndp.co.uk)

21<sup>st</sup> April, 2021

Dear

**Cubert Neighbourhood Development Plan (NDP)**

As you may be aware, Cubert Parish Council's application to formally designate the Cubert Parish as a Neighbourhood Area was approved in January 2019, with the actual process of preparing the Cubert NDP getting underway later in the year with the formation of a Steering Group.

After the preliminary issues of preparing Terms of Reference together with allocation of jobs and roles, attention soon turned to the central and fundamental requirement of preparing an NDP – consultation and engagement with the local parish community. An initial survey of all parishioners was undertaken in early 2020 and the results published in May 2020, by which time Covid restrictions were in place. The next logical step of face to face public engagement and consultation has not been possible although the work of the Steering Group has continued.

A detailed record of the local environment and landscape has been taken with a subsequent questionnaire being circulated both online and via the April newsletter. A Crime Survey has also been undertaken and a targeted survey of local businesses, to identify more precisely their associated needs and wants in terms of future development, is planned for May, 2021.

Another sub-group has been tasked with further evaluation of the initial survey findings in relation to future residential development in the parish but in recognition of the importance and the implications of this sector on the future of the parish, we feel it may be short-sighted to try and progress matters much further without direct engagement and consultation with the community. The opportunity to do this may not be many months away but it is not available at the moment.

However, what we would like to do in the meantime, is to liaise with local residential developers such as you, who have or have had an association with Cubert parish, in a bid to gauge your views, thoughts and comments on the future delivery of housing in the parish and how this should be incorporated into the NDP?

We have deliberately not provided any prescribed topics or aspects but wish to hear how you feel future residential development in the parish can be kept in balance with the competing interests of other uses and users? You may find it helpful as a starting point to consider the responses and findings of the initial survey which are published on the Cubert NDP website and also on the Cubert NDP Facebook page.

We look forward to the hearing from you?

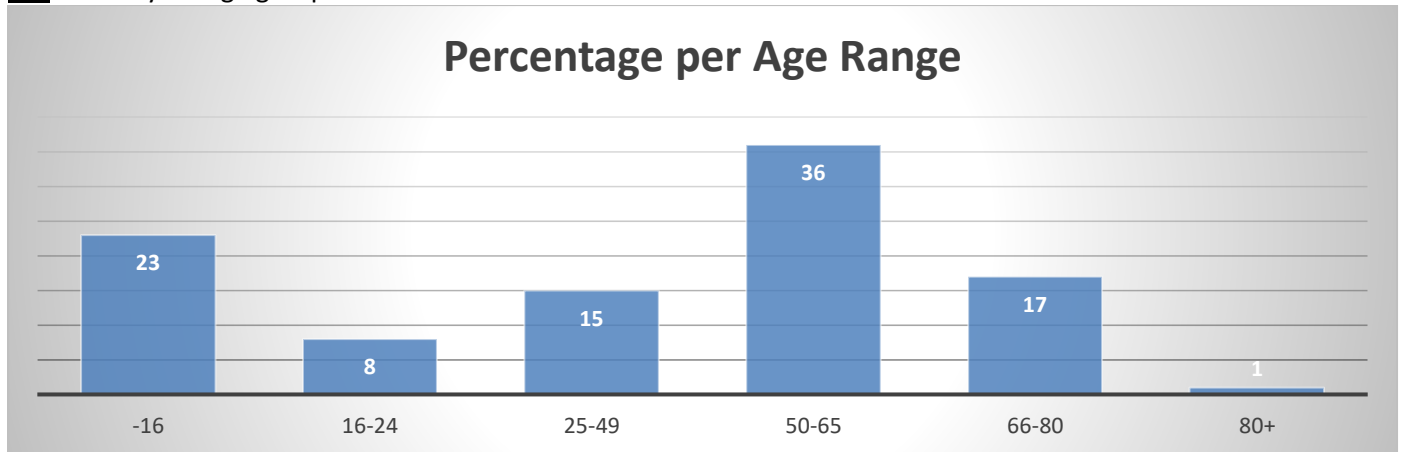
Yours faithfully

Michael Crisp  
Chairman  
Cubert Neighborhood Development Plan

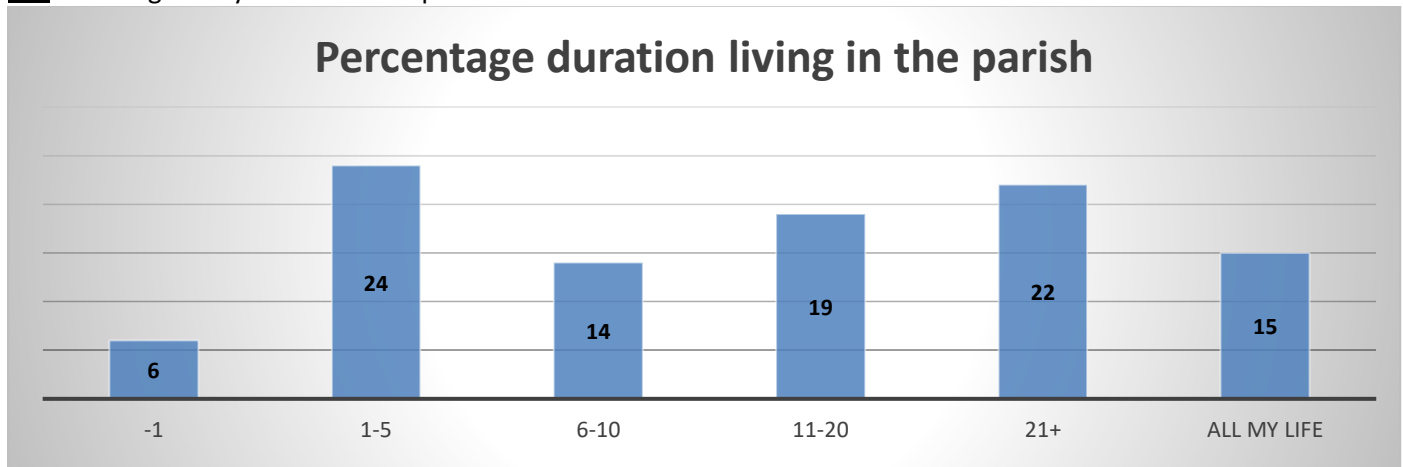
**Appendix 4: Breakdown of replies to the resident survey.**

(Some questions referred to individual data and were therefore left out of the reply summary).

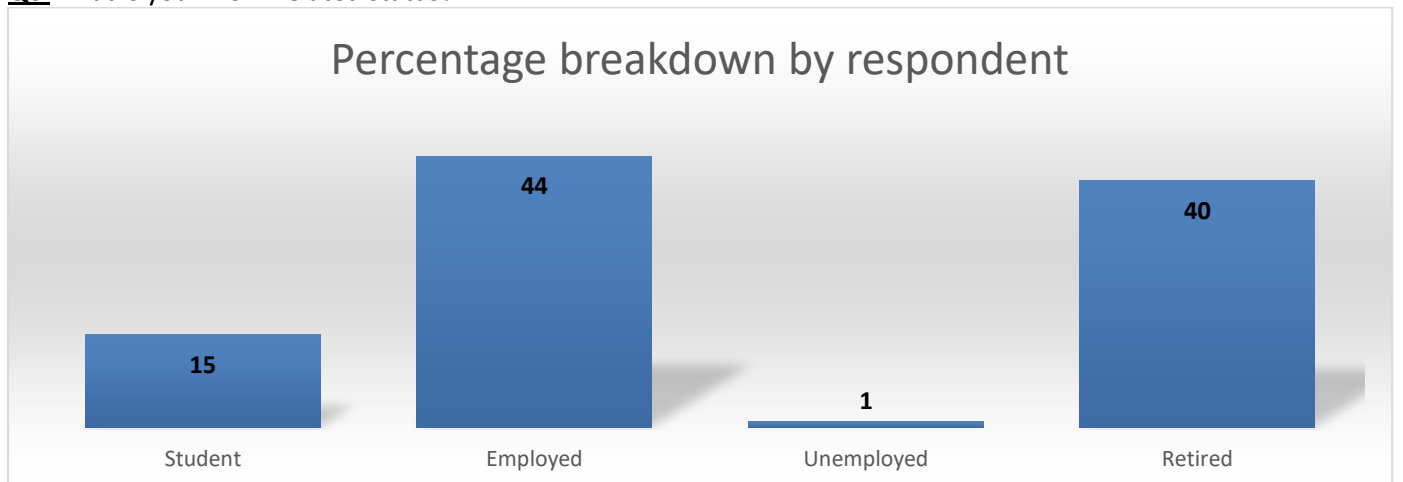
**Q3** What is your age group?



**Q5** How long have you lived in the parish?

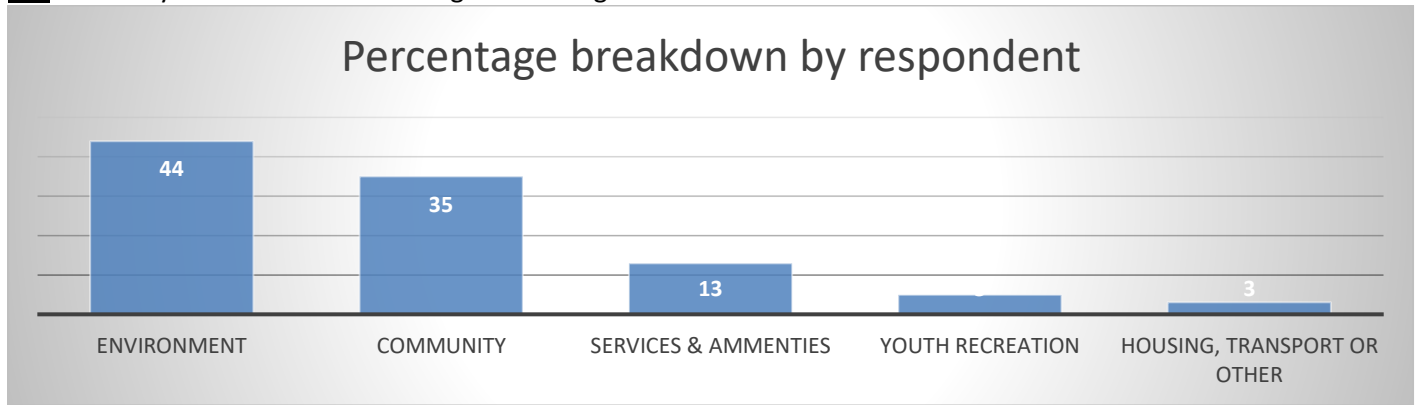


**Q6** What is your work-related status?

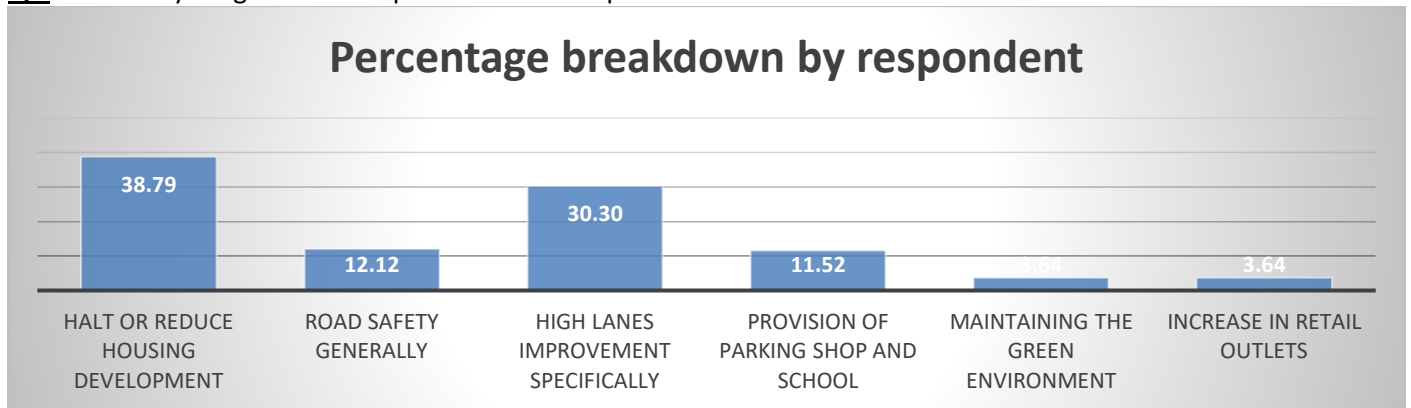


Note: Of those who were employed 50% worked within the parish.

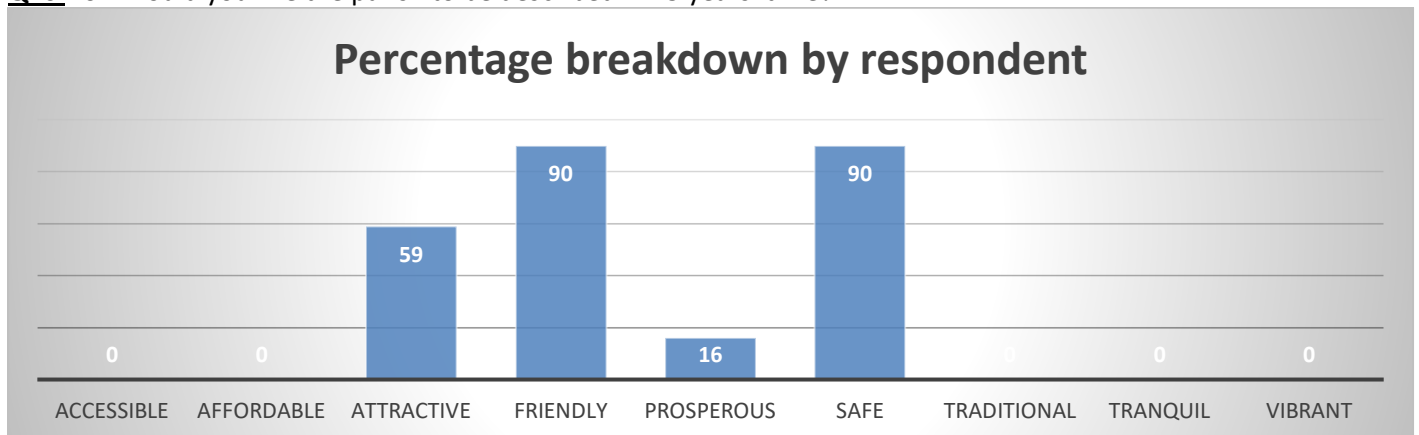
**Q8** What do you like most about living in the village?



**Q9** What if anything could be improved about the parish?

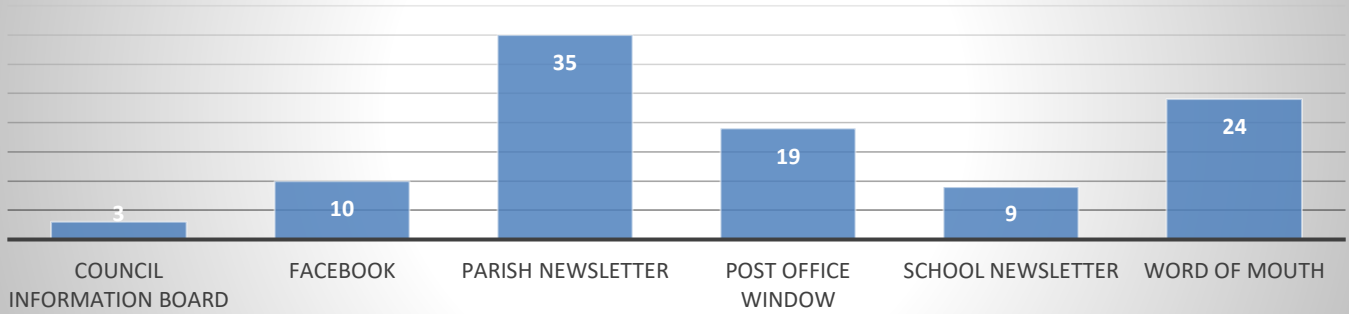


**Q10** How would you like the parish to be described in 15 years' time?



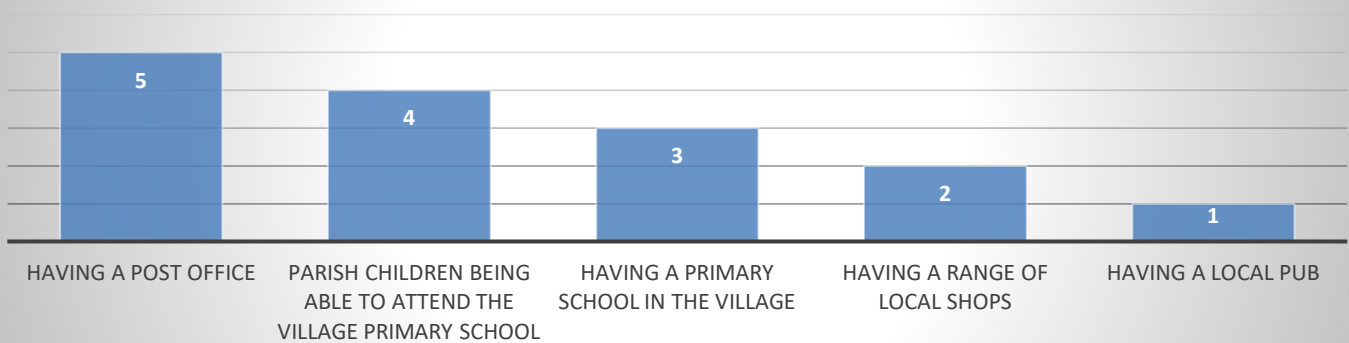
**Q11** Where do you tend to look to get information about the parish?

## Percentage breakdown by respondent



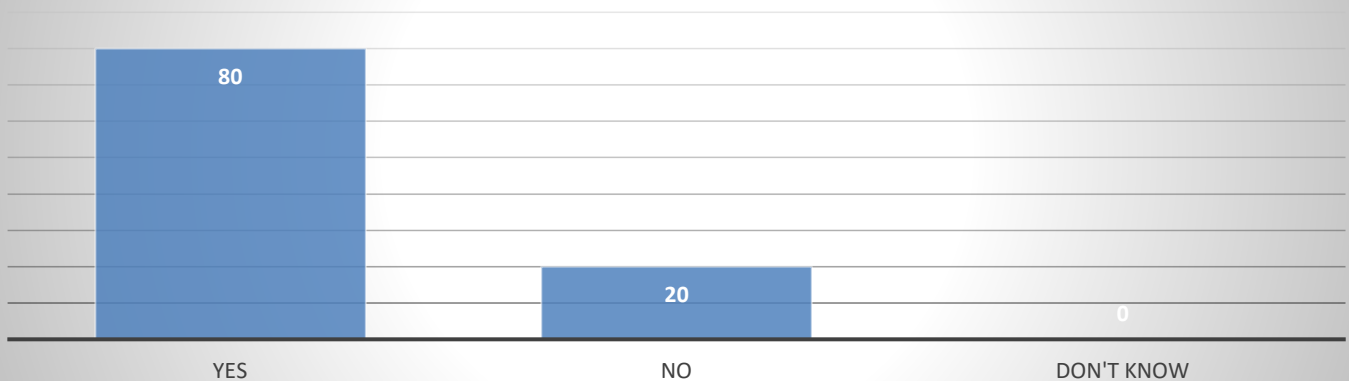
**Q12** When it comes to education and business what is important to you?

## Prioritisation 1 - 5



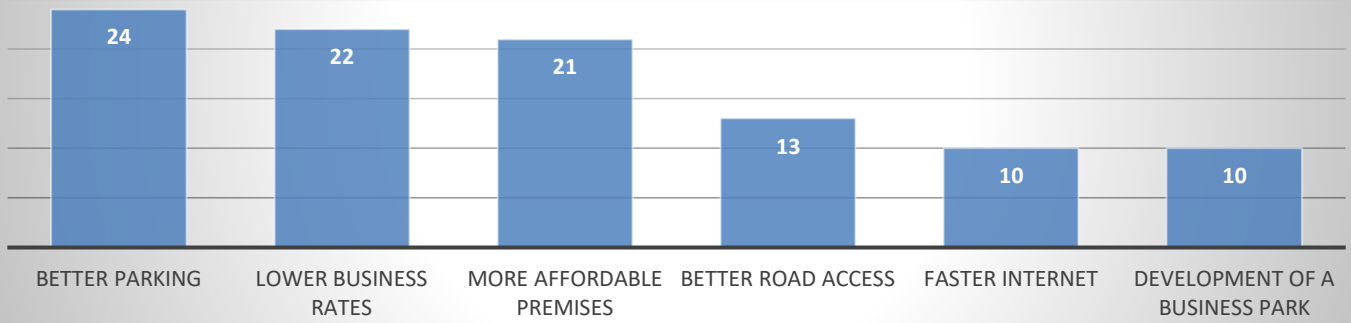
**Q13** Should new business be encouraged in the parish?

## Percentage breakdown by respondent



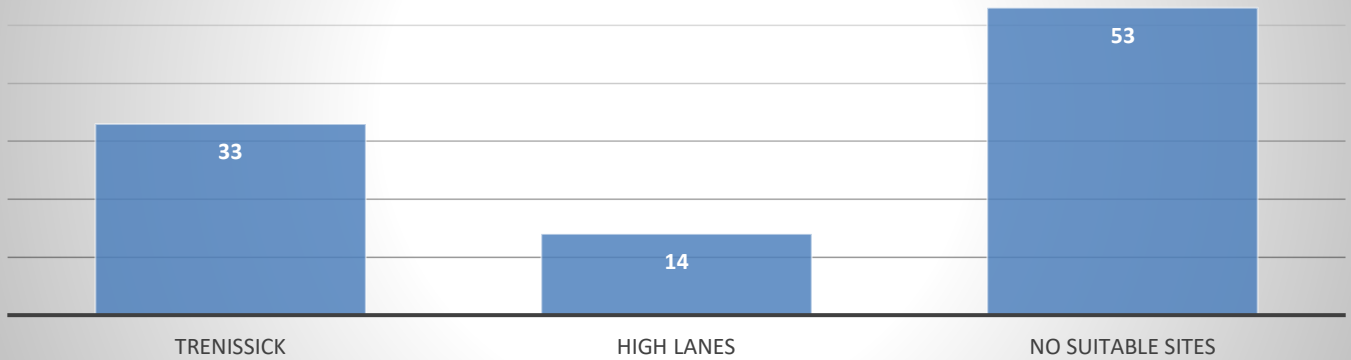
**Q14** What would encourage new business into the parish?

## Percentage breakdown by respondent



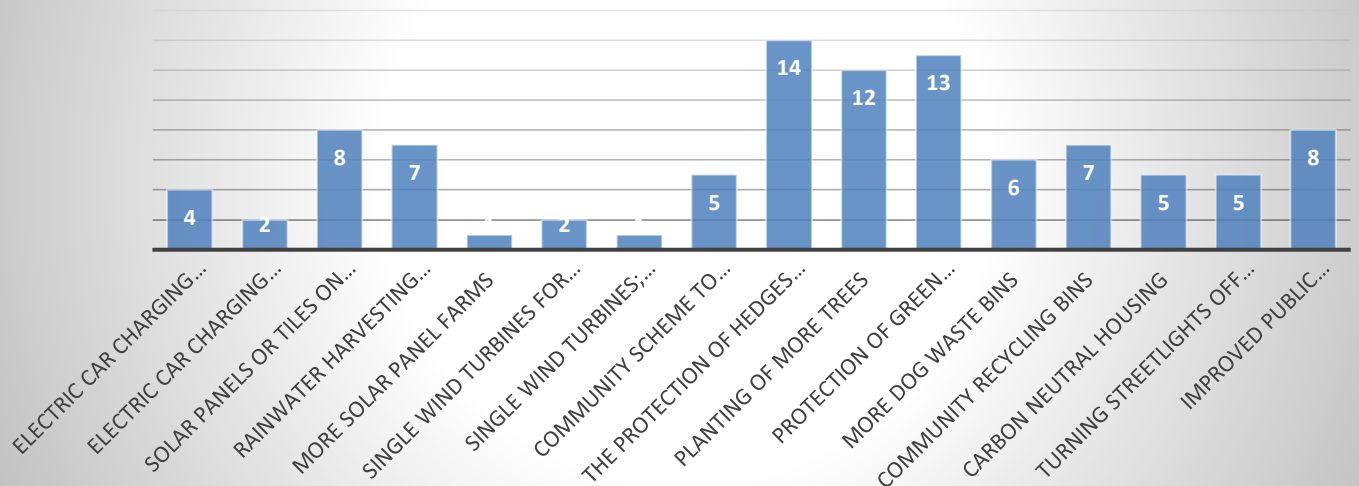
**Q15** Are there any sites within the parish that you think are suitable for business development?

## Percentage breakdown by respondent



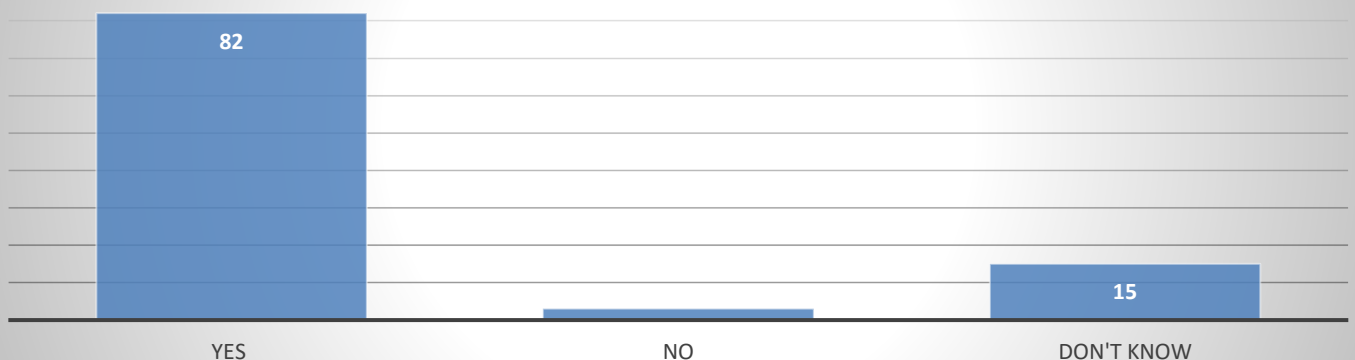
**Q16** When it comes to thinking about the environment, what would you like to see prioritised in the neighbourhood plan? (please tick a maximum of 8 )

## Should the parish do more to preserve and protect nature and wildlife?



**Q17** Should the parish do more to preserve and protect nature and wildlife?

### Percentage breakdown by respondent



**Q18** Are there any areas you think should be protected from development?

The comments for areas to be protected cover virtually all areas outside the existing Cubert and Holywell settlements. Listed below is a precis of a large range of replies.

Any surrounding 'GREEN BELT' respecting the existing development envelope.

Penhale camp but it is too late - should have been purchased at the low price it sold for.

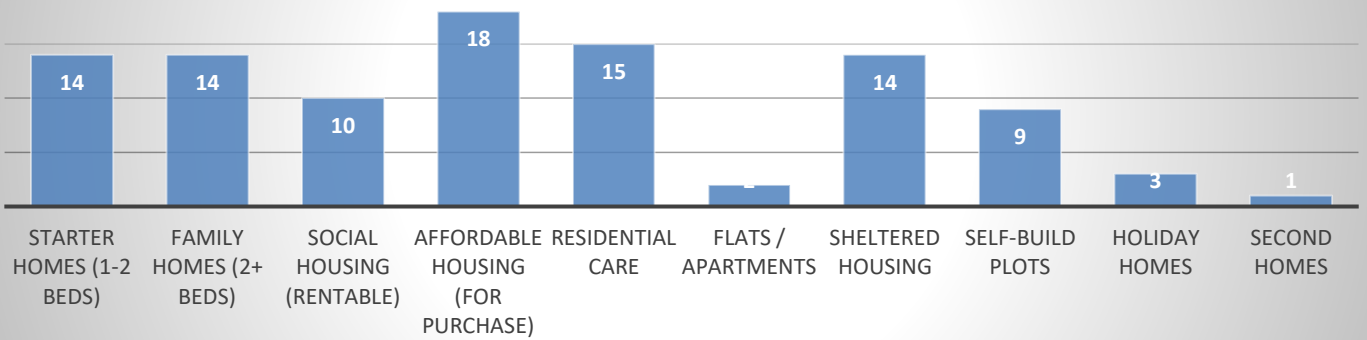
Designated areas of outstanding natural beauty, e.g. Cubert Common.

Land outside village boundary, land and woodland between hamlets - Treworgans and Tresean, and land between Cubert and Holywell, land used by public to access Cubert Common as well as Common itself,

Land between Cubert and Ellenglaze. Areas surrounding footpaths.

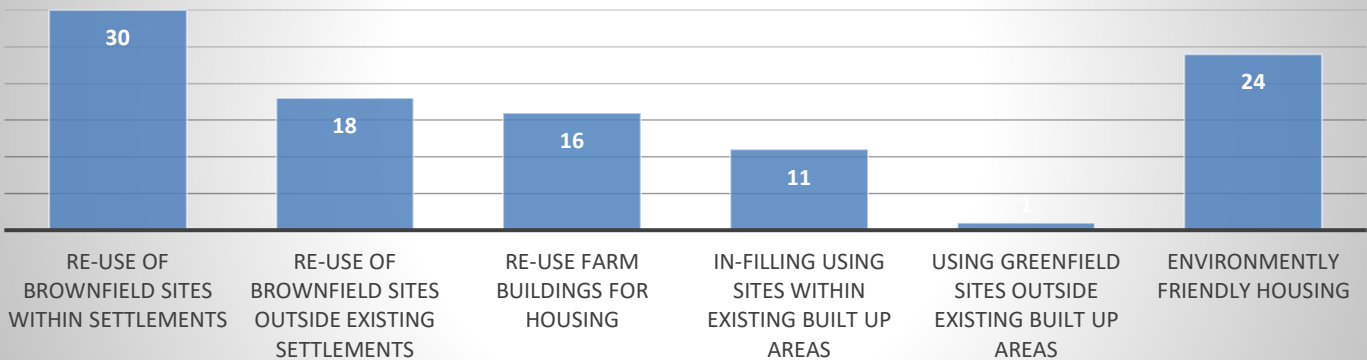
**Q19** What sort of new housing (if any) do you want to see prioritised within the Parish?

### Percentage breakdown by respondent



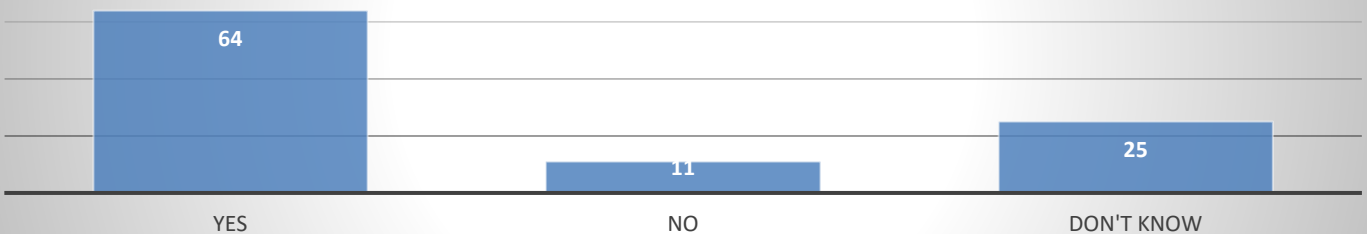
**Q20** What should be sustainably developed over the next 15 years?

### Percentage breakdown by respondent



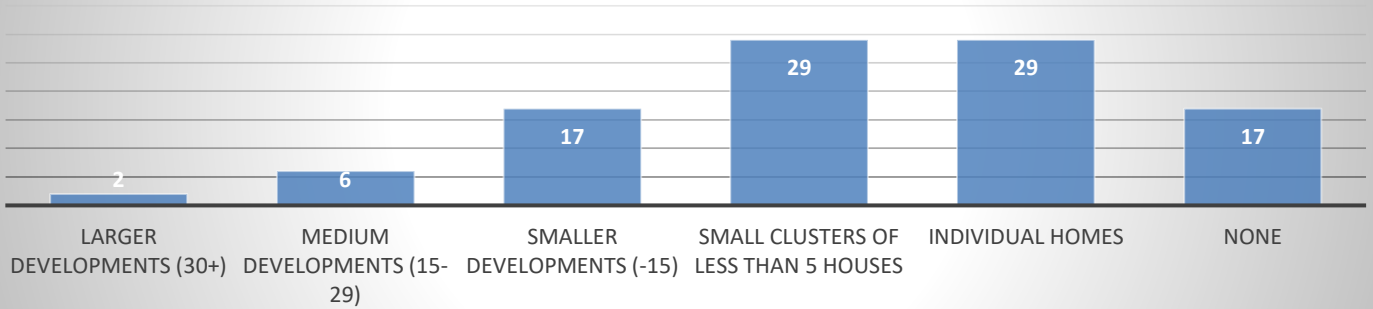
**Q21** Should all new developments be principal residences?

### Percentage breakdown by respondent



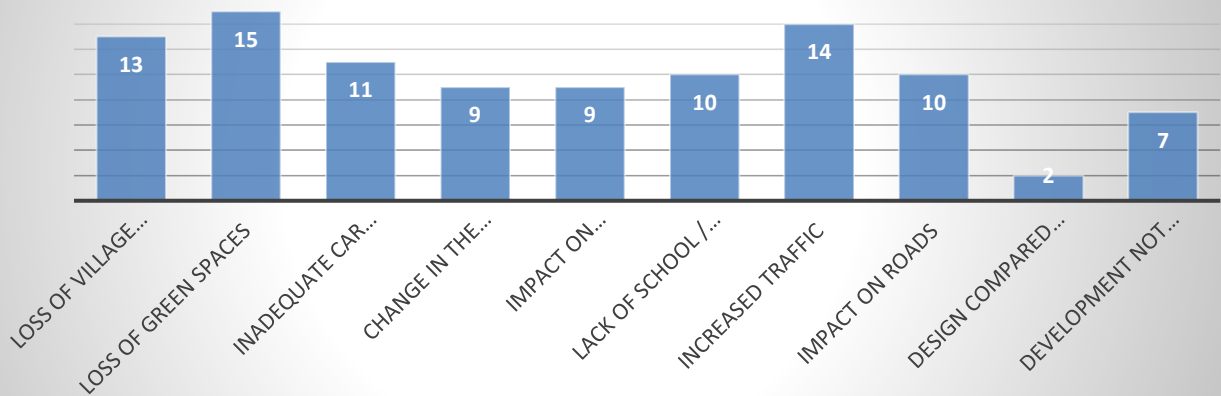
**Q22** What size of housing development do you think would be most appropriate in the parish?

## Percentage breakdown by respondent



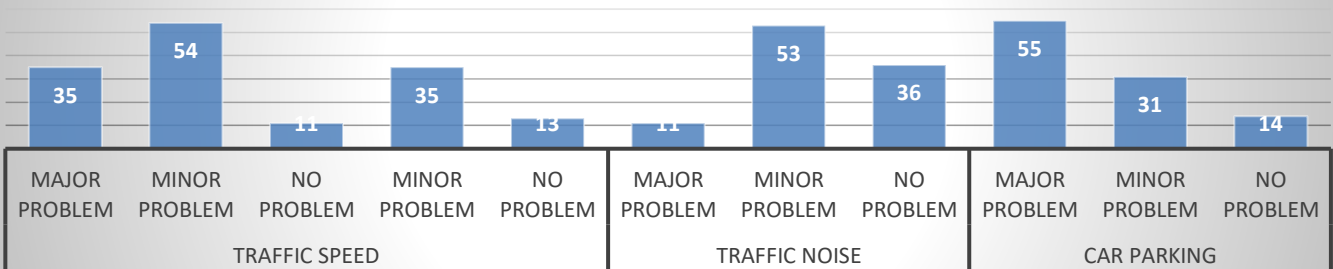
Q25 What most worries you about further development within the parish?

## Percentage breakdown by respondent



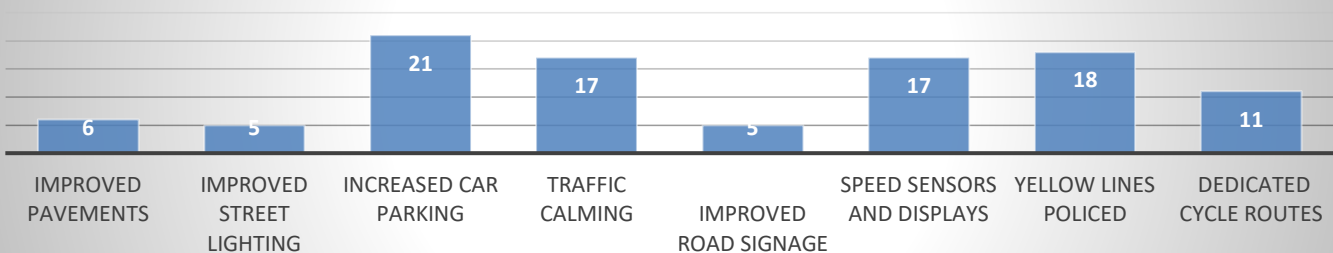
Q26 Thinking of the parish, how much of a problem are the following issues?

## Percentage breakdown by respondent



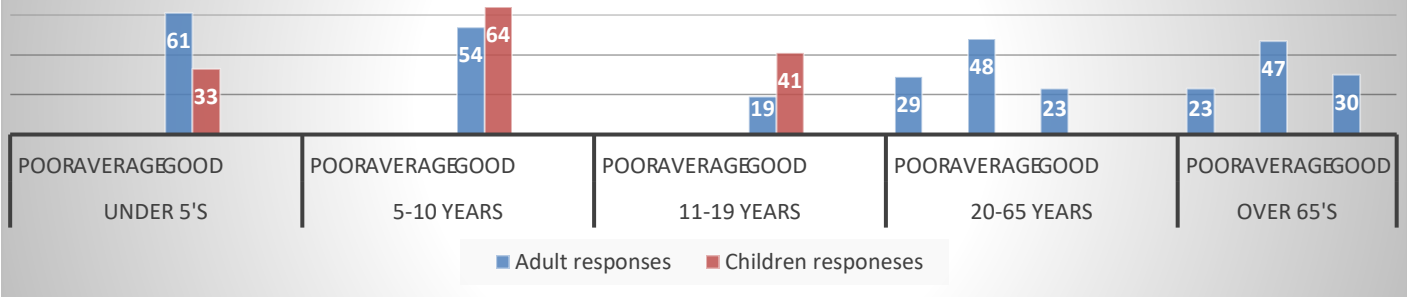
Q28 Which of the following measures do you think might improve road safety in the parish?

## Percentage breakdown by respondent



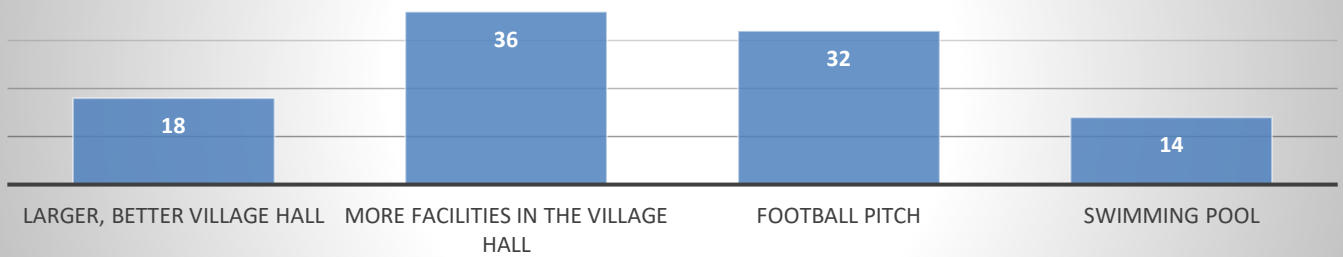
Q29 How would you rate the recreational facilities for differing age groups?

## Recreational facilities in the parish



Q30 What would improve the recreational facilities?

## Percentage breakdown by respondent



Q31 Would you support a football pitch / sports field in the parish?

## Percentage breakdown by respondent



Q32 Do you feel safe when out and about in the parish?

## Percentage breakdown by respondent



#### Appendix 4 continued: Cubert NDP Questionnaire Response Summary Business

We had a total of 11 responses from businesses in the parish, with the largest sectors being Agriculture/Farming & Equine.

45.5% owned their own premises with 36.4% renting & 18.2% leasing.

45.5% said they would not require additional workspace, The largest requirement for additional/new workspace was for yard/land space (27.3%) with the rest requiring Warehouse/Workshop/Meeting space/Agricultural space/Land to build/Flexible or shared office (9.1% each).

45.5% thought that any new business development should be on a brownfield site, 45.5% also thought that new retail/business areas should be developed, 36.4% thought this could be on agricultural green field sites, 36.4% said convert existing agricultural buildings & same for existing unspecified buildings 9.1% thought no additional business sites should be included.

In terms of business support requirements, 72.7% would like faster broadband, 36.4% improved mobile reception, 27.3% improved transport links/better parking, 18.2% housing for respondent or staff.

From the respondents we were told a total of 22 fulltime, 37 part time & up to 8 seasonal staff are employed with 13 living in the parish.

91% (45.5%/45.5%) said they were likely or very likely to increase the number of people employed in the next 5 years with only 9.1% saying unlikely or not at all likely (9.1%/0%).

Availability of suitable premises & living in the parish were the primary reasons for choosing to set up business in Cubert 36.4%) followed by cost of rent & rural/village setting (27.3%) with other reasons given as existing business,, friendly/convenient village. Cost of purchase & access to green spaces.

#### Conclusion

There is clearly a need for additional yard space & larger premises for existing businesses with some requirement for land to purchase. There is also a need for low-cost flexible office space, and agricultural development which could come under permitted development (not needed to be addressed by the CNDP).

## **Appendix 5: Responses and proposals (in 2021) from the public exhibition of 13<sup>th</sup> November, 2021.**

The draft policies were informed by *The Cubert Parish Neighbourhood Development Plan Survey (2020)*; *The Road Safety and Parking Survey for Cubert Parish (2021)* (87 questionnaires completed) and comments received at the CNDP exhibition at the village hall.

Parking restrictions (yellow lines etc.) are not part of the CNDP.

The CNDP draft policies will likely fall under the following headings:

### **Local Traffic Management including Road Safety and Traffic Speed**

- applicant to provide impact statement in respect to additional traffic/parking
- applicant to demonstrate how they will mitigate effects of increased traffic etc
- Parish would not support development linked with unacceptable highway dangers and traffic volumes

### **Footpaths, Rights of Way, Cycle Paths and Equestrian routes**

- footpaths to modern standards for use by all including those with mobility issues
- Footpaths to add to the existing footpath network to promote walkability and provide access to key village facilities.
- Developments to preserve and encourage the use of rights of way and equestrian routes.
- Proposals that harm characteristics of rights of way will be resisted.
- Financial support to be sought to fund improvements to existing footpath and road network
- (possible policy for funding for safe routes to school may be added)
- Commercial developments to provide secure and sheltered cycle parking

### **Car parking on streets and on proposed residential and commercial developments**

- Both residential and commercial development to provide adequate parking and not add to the burden of on-street parking.
- Development not to rely on parking in existing streets where this would adversely affect safety and or character of the area.
- Financial support may be sought to fund improved parking provision in the parish.

### **Public transport**

- Development to provide safe pedestrian access to nearest bus stop
- Financial support for new bus shelters and pull-ins may be sought

### **Air quality related to traffic**

- Measures to be taken to mitigate increases in air pollution
- Residential and commercial development to include electric vehicle charging points

## Road improvements and congestion

- Financial support may be sought to fund improvements in Holywell to reduce summertime traffic congestion.

**Protecting heritage assets and green spaces:** 46 completed questionnaires were received.

### Section 1

Respondents were asked to mark on a map of the parish the areas they most valued for wildlife, recreation, historical interest, and where they felt most connected to the environment. Areas most valued for both nature and wildlife and connection to the surroundings were Cubert Common and Kelsey Headland, Holywell and Polly Joke beaches, and the footpath around the parish. The church field, skate park and play area at Chapel Green, together with the footpaths and beaches were most valued for recreation. Most valued for historical interest was the church, followed by the Wesley chapel, the holy well at Trevornick and the traditional buildings at Trevail.

### Section 2

There was overwhelming agreement with all the statements in this section, showing strong support for protecting the green spaces within the parish, conserving and maintaining the Cornish hedges and historic field patterns, as well as maintaining wildlife corridors between the settlements within the parish and creating areas of indigenous woodland. Responses supported controlling levels of development and tourism in order to protect existing green spaces and the rural landscape.

### Section 3

Respondents strongly agreed that Cubert has a good network of public footpaths and open access land, and questions about the use of the footpaths showed that they are used for daily exercise and dog walking.

Suggestions for retaining the unspoilt nature of these paths included: -

Educating users about the countryside code and protecting nature - Organised volunteer litter picking - Employing a designated maintenance team - Increased bins for litter and dog waste

Questions about the pattern of use of the common land and open spaces:

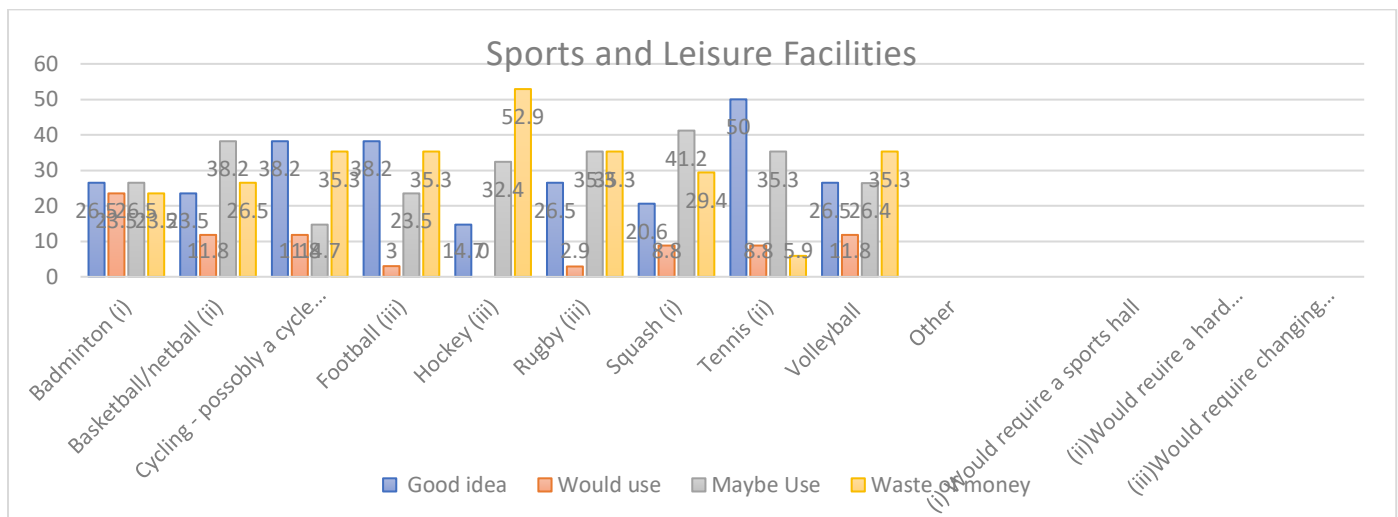
Most respondents used these areas weekly and mostly for walking and cycling. 56% of respondents expressed an interest in volunteering for conservation work to develop and protect the environment.

Examples of additional comments: - A cycle path to the beach would be a safe option for many, especially families, to access Holywell Bay and reduce traffic and parking issues. - Tresean common could be better managed – ideal place to plant native trees

Suggestions about the church and village square being the main focal point of the village

-More community activities aimed at families - Hold regular events in the area e.g., farmers markets - Provide more bench seats so that people can meet, sit, and relax. Pedestrianize the village square.

## Sports & Leisure



### Free text comments included:

Most of the above choices are already available in the youth park, tennis court or village hall. A cycling track unless through varied terrain would probably hold minimal interest after an initial time or two using and likely not engage kids over 10 who are not interested in the skate park.

A basic football pitch which I'm sure would be used daily could be achieved quickly opposite the toddler park with the siting of two goals and perhaps netting to protect nearby gardens. If you develop a proper football pitch with changing rooms this will be great for official football but will children in the village be allowed to use it? Probably not which in my opinion defeats the purpose it will become the same as the school field off-limits.

On behalf of my daughter who is 12 all she and her friends want is swings but there are all sorts of climbing and seesaw/swinging equipment and all weather table tennis tables that might make the village more inclusive if you're too old for the toddler park, a girl and don't skateboard. Table tennis tables might also engage people of all ages as can be seen in France. Also, what about activities such as a bowling green. A permanent beach volleyball site would be good and likely used by visitors and locals alike.

Please do not allow the facility to be situated WITHIN the village because of noise, access, and parking. Provide adequate parking for the facility. Please plant plenty of trees around the facility.

Would love to see a swimming pool.

Outdoor table tennis tables would be great.

A football pitch would be ideal for kids and would help the community spirit.

I ticked them all as this needs to cater for all ages & will hopefully encourage younger people to join in. With the tennis, could the school court be developed? Cycle track Cubert/Crantock safe and environmentally friendly. I left squash blank because although I wouldn't use it or think it's a great idea, I wouldn't think it was a waste of money.

### Housing development

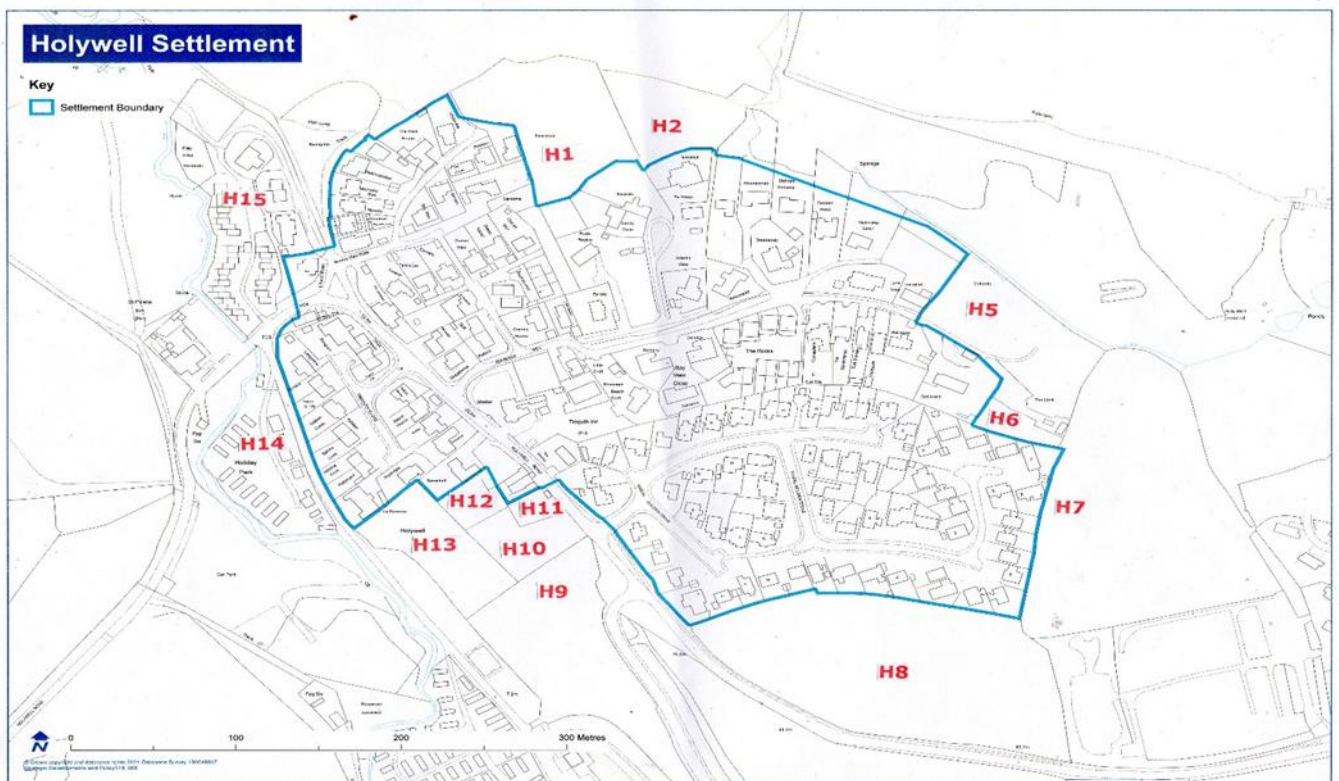
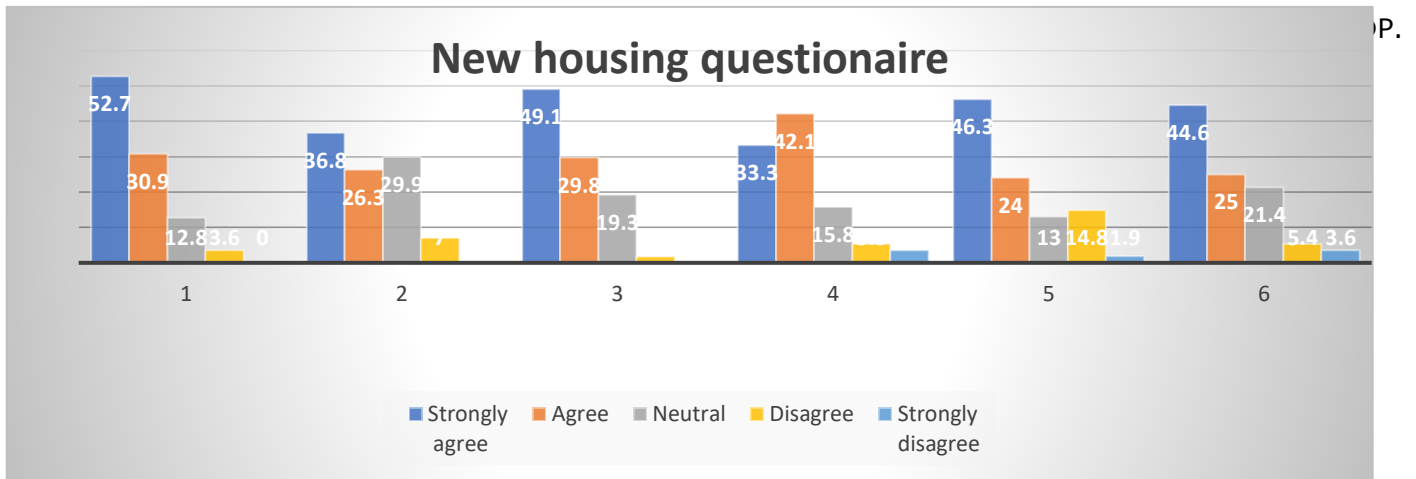
**Q1** There are several hamlets within the parish (e.g. Trevail, Tresean, Treworgans and Ellenglaze). Should the CNDP seek to retain the size, identity and historic character of the hamlets?

**Q2** Trevail is currently a separate and distinct hamlet from the settlement of Cubert. Should the CNDP seek to retain this separation?

**Q3** Tresean is separated from Trevail by a section of open countryside. Should the CNDP seek to retain this separation?

**Q4** There have been calls for "self-build" affordable housing development in Cubert. Should the CNDP seek to identify suitable areas for this type of development?

**Q5** A "Primary Residence" restriction would restrict future housing to local connection purchasers. Should the CNDP seek to include this condition on future developments?

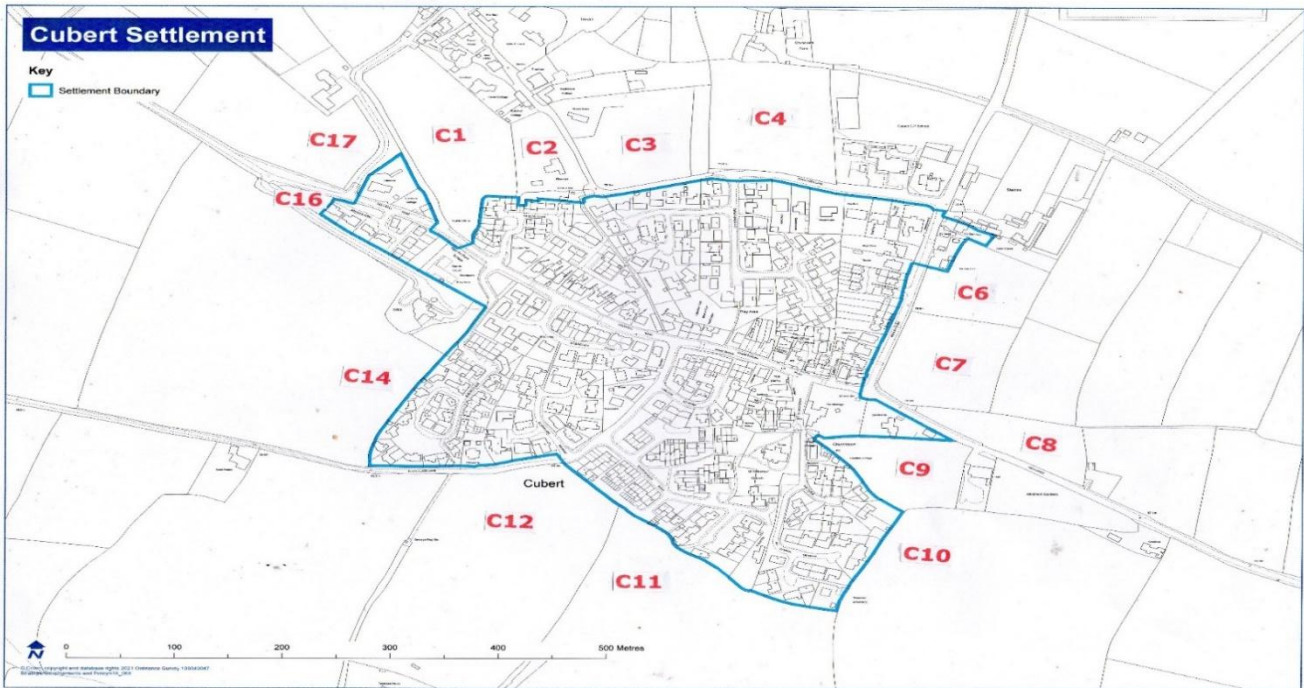


## HOLYWELL MAP

### Annotations and Comments from the Holywell Map

No. on Map	For Development	Against Development	Comments
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H1	3		Abuts Kelsey Head SSSI, Perranporth & Holywell AGLV & Treguth Common.
H2	2		Lies wholly within Kelsey Head SSSI.
H4		1	Lies wholly within Kelsey Head SSSI.
H5	7	2	Abuts Kelsey Head SSSI.
H6	3	2	
H7	2	1	
H8	10	1	
H9	5	1	
H10	10		
H11	6		
H12	5		
H13	4	1	
H14	3		For both H14 & H15 respondents indicated that if residential use were to be granted it should only be for affordable/local needs housing. Abuts Perranporth & Holywell AGLV.
H15	3		See H14 above for respondent's comments. Abuts Kelsey Head SSSI, Perranporth & Holywell AGLV & Treguth Common.



## CUBERT MAP

### Annotations and Comments from the Cubert Map

No. on Map	For Development	Against Development	Comments
C1	7	5	Several "For" suggested only southern part of field for development.
C2	1		
C3	14		
			Strip between C3/C4 is a pipeline corridor.
C4	12	3	Against replies wanted land reserved for possible future school expansion.
C6	28	1	
C7	22	1	
C8	8		
C9	6	3	
C10	2		
C11	1	1	
C12	1	1	
C13		1	
C14	3	2	
C16	3		
C17	2		

A number of respondents supported a "ribbon" form of development along the north side of High Lanes from C8 opposite the Village Hall and extending eastward towards the A3075. In the round there were 2 comments against and 6 for various fields. There was a further return in favour of development between High Lanes and the unclassified road from Wesley Road (opposite Chynoweth Farm entrance) to Trenissick.





To give notice that the Cubert Neighbourhood Development Plan (NDP) is completed for consultation and review.

It is published, together with supporting documents in the form of a Design Code and Landscape Character Assessment, on the NDP website <https://www.cubertndp.co.uk/>

People who are interested in the subject but do not have immediate access to the internet and cannot achieve access via family or friends may utilise the services of Cornwall Libraries.

Alternatively, queries can be sent by post to:

Clerk to the Parish Council  
Pengoön, Treguth Close,  
Holywell Bay. TR8 5DD

Over and above this, the NDP Steering Group members will be holding an exhibition/Q&A event in the Beacon of Light Community Church building on Saturday 12<sup>th</sup> October 2024 between 10.00am and 4.00pm.

As with the last event, the proposed policies, aims and objectives together with the rationale that led to them, will be on display.

## **Interim Cubert Parish Newsletter August 2024**

The Parish Council is still looking for an editor for the monthly Newsletter.

### **CUBERT Neighbourhood Development Plan (NDP) and Cubert Design Guide**

The Neighbourhood Development Plan continues to progress through the formal stages prior adoption as a valid to eventual planning document.

The Development Plan in its Draft form, along with the Design Guide, is now available for Formal Consultation by the public and formal consultees. Members of the public (including all Cubert Parish residents) and other interested parties are invited to access the Cubert NDP website at [www.cubertndp.co.uk](http://www.cubertndp.co.uk), view the Cubert Neighbourhood Development Plan and its accompanying Design Guide, and to make comment accordingly.

A public exhibition is to be held at the Beacon of Light Building (previously the Methodist Church Hall) in Holywell Road, Cubert, between 10am and 4pm on Saturday 12th October 2024 when further comments can be made by the public and residents.

Both the P

Both the Plan and the Design Guide are available to view on [www.cubertndp.co.uk](http://www.cubertndp.co.uk) and comments or observations may be made via [info@cubertndp.co.uk](mailto:info@cubertndp.co.uk).

## Appendix 8: Responses from businesses and organisations received during the Regulation 14 Consultation period.

Note: A local Neighbourhood Development Plan (NDP) provides an additional layer of protection and aspiration within the planning system. It is a representation of some of the concerns and aspirations of local residents and businesses within the designated boundary of the local area within the NDP. A Neighbourhood Development Plan is not meant to replace national or countywide plans and protections, and does not need to include all items and issues already included in the national and countywide plans. It is also not a platform for officers or members of either local or national government to impose their own organisations' concerns and aspirations within a local parish plan. The NDP should not introduce protections or restrictions that are contrary to either national or countywide plans/restrictions. It should therefore be noted that where a suggestion for change to any NDP statement/wording is made from any outside organisation, then as long as the NDP statement/wording does not contradict national or countywide plans, then the NDP does not need to automatically include the suggestion for change given.

The email addresses of organisations contacted as part of the Regulation 14 consultation period are included in [Appendix 2](#).

09.09.2024.

Thank you for your email. We confirm safe receipt.

Please can you record the email addresses of all those that respond to the consultation so that they can be informed of any changes to the neighbourhood plan. These details need to be sent to us as well as the consultation statement when you submit the neighbourhood plan because we are required to consult with these organisations/people when the plan is published for its submission consultation.

Many thanks.

Michaela Pollard | Development Officer (Working Monday - Thursday)

Cornwall Council | Planning and Housing

[Response: A copy of the consultation statement will be forwarded \(including the addresses at Appendix 1\).](#)

16.09.2024.

Dear Mr Crisp

Thank you for the opportunity to review the draft Cubert Neighbourhood Development Plan.

On page 39, policy TTA1 refers to a Transport, Accessibility and Connectivity Plan set out on Map 7. Map 7 however shows listed buildings in Holywell. I cannot easily locate the Transport plan amongst the other maps – could you please send me a copy (and note the correction that is needed when the document is finalised) so that I can consider it in my feedback?

Thank you

Hannah Harris | Principal Transport Officer

24.09.2024.

Dear Mr Crisp

Thank you for updating the plan. Please can you clarify which map is the Transport, Accessibility and Connectivity Plan as Policy TTA1 says 'Our Transport, Accessibility and Connectivity Plan identifies the key transport and accessibility constraints and opportunities in the Parish' – I am still unclear which map is being referenced here as no map reference is now given. Sorry for being so persistent here, it is just that the Plan forms part of your policy which references proposals being supported on the basis of delivering the opportunities identified, and not impacting the constraints.

Kind Regards

Hannah Harris | Principal Transport Officer

[Response: The map has been forwarded under separate correspondence.](#)

17.09.2024.

Good afternoon, Mr. Crisp,

Thank you for providing Children, Schools and Families (part of Together for Families, Cornwall Council) with the opportunity to comment on the draft Cubert Neighbourhood Plan. Having reviewed the plan's proposed policies, we have no objections from an educational perspective.

Best wishes,

Peter Batten | Education & Early Years Sufficiency Manager

[Response: NFA.](#)

10.09.2024.

Dear Members of the Cubert NP Steering Group.

On behalf of St. Newlyn East Parish Council, I am writing to thank you for sending us the details of the Regulation 14 Consultation for the Cubert Neighbourhood Plan. Having just completed our own plan, we know how much work it takes to get to this stage! At this stage, St. Newlyn East Parish Council does not have any further comment.

We wish you well with the referendum.

Kind regards, Kathryn

Clerk, St. Newlyn East Parish Council

[Response: NFA.](#)

01.10.2024.

Dear Michael

Cubert Parish Neighbour Development Plan

At our meeting last week Newquay Town Council's Planning & Licensing Committee discussed the Cubert Parish draft NDP. Whilst our Cllrs had no specific comments to make on the draft, they wanted to offer you and your colleagues their congratulations for what they considered to be a really good piece of work.

You'll be aware the new CLP is on its way and our Cllrs were interested to know whether you are looking to wait until this is in place before pushing forward with the adoption of your own NDP. We recently found ourselves on the wrong end of a Planning Appeal decision, largely due to the adoption dates of our NDP and Cornwall Council's Site Allocations DPD. Although our NDP was written after the DPD, the bureaucracy involved eventually saw the DPD being adopted a few months after our NDP was in place. Unfortunately, when looking at policies relating to the Newquay Settlement Boundary, the Inspector concluded this later adoption date meant the DPD policies effectively superseded those of the NDP. Effectively, we were being told by the Inspector that our Settlement Boundary policies only ever had a shelf life of a few months – which as you can imagine has proved frustrating.

Anyway, this may or may not be relevant to the adoption of your own NDP, but it is worth knowing this sort of glitch can occur.

In the meantime, the Cllrs that make up our Planning & Licensing Committee are keen to wish your NDP Steering Group every success for the remaining stages in the process.

Kind regards

Duncan

Duncan McLeod

Planning & Licensing Administrator

Newquay Town Council

[Response: NFA.](#)

20.09.2024.

Hi, I have just started reviewing the Neighbourhood plan. I notice you do not have Carines Farm on the map. This I think should be there as it is a Grade 2 star listed property and would have significant impact on the plan. I'll keep reading.

Kind regards, Sarah Lorimer Turner

[Response: Carines Farm Grade 2 now listed.](#)

23.10.2024.

Dear Sir / Madam

We write to you with regards to the current consultations as detailed above in respect of our client, National Grid Electricity Transmission.

Proposed development sites crossed or in close proximity to NGET assets:

An assessment has been carried out with respect to NGET's assets which include high voltage electricity assets and other electricity infrastructure. NGET has identified that it has no record of such assets within the Neighbourhood Plan area.

Tom Wignall, Graduate Planner

[Response: NFA.](#)

08.10.2024.

Thank you for consulting Sport England on the above application.

The proposed development does not fall within either our statutory remit (Statutory Instrument 2015/595), or non-statutory remit (National Planning Policy Guidance (PPG) Par. 003 Ref. ID: 37-003-20140306) and, therefore, Sport England has not provided a detailed response in this case but would wish to give the following advice to aid the assessment of this application.

General guidance and advice can be found on our website:

[https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning\\_applications](https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications)

If the proposal involves the **loss of any sports facility**, then full consideration should be given to whether the proposal meets Par. 103 of National Planning Policy Framework (NPPF), is in accordance with local policies to protect social infrastructure, and meets any approved Playing Pitch Strategy or Built Sports Facility Strategy that the local authority has in place.

If the proposal involves the provision of a **new sports facility**, then consideration should be given to the recommendations and priorities set out in any approved Playing Pitch Strategy or Built Sports Facility Strategy that the local authority may have in place. In addition, to ensure they are fit for purpose, such facilities should be designed in accordance with Sport England, or the relevant National Governing Body, design guidance notes:

<http://sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

If the proposal involves the provision of additional **housing** then it will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then new and/or improved sports facilities should be secured and delivered in accordance with any approved local policy for social infrastructure, and priorities set out in any Playing Pitch Strategy or Built Sports Facility Strategy that the local authority has in place.

In line with the Government's NPPF (including Section 8) and PPG (Health and wellbeing section), consideration should also be given to how **any new development**, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing or assessing a proposal. Active Design provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity.

NPPF Section 8: <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities>

PPG Health and wellbeing section: <https://www.gov.uk/guidance/health-and-wellbeing>

Sport England's Active Design Guidance: <https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design>

*Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.*

Yours

sincerely

Planning

Technical

Team

*Response: (Note: a sports field once used by the local Holywell & Cubert Football Club (now disbanded) was located in the Penhale Army Camp, outside of the designated CNDP boundary. The pitch has not been in use for over a decade, and the Parish Council notified Sports England and Cornwall Council of the closure of the field at that time). NFA.*

17.10.2024.

I was reviewing the draft Cubert NDP, and I was surprised to see no mention of aspirations for a new pitch. Objective 22 on page 63 mentions protecting and enhancing, but if we are going to be taken seriously with regards compensating the loss of the Penhale pitch, it doesn't do the cause any favours this being omitted from the NDP. Surely if there is a demand then this would be a serious objective regardless of whether Penhale contribute or not? The NDP represents the perfect opportunity to not only establish the principle of a sports field for Cubert, but also to identify the most suitable location(s). If we don't have a location we are not permitted to request a contribution for one in a section 106 agreement either with Penhale, or any other future development in the parish. Policy SL1 doesn't help either, because it establishes that there are only four current locations, none of which are a full pitch, and simply deals (in part 2) with the loss of one. Whereas the NDP needs to evidence that there is demand for a pitch and include a policy for delivering a new facility.

I appreciate that a lot of time has passed since the football club had access to the Penhale pitch, so it is quite possible that there is no longer the demand. If this is the case then it would be better for me to lift our current objection. Whilst the development is technically in Perranzabuloe, I think that we would struggle to evidence the same deficiency or requirement to compensate for the loss there, unless Cubert FC now play at Perranporth for example.

Many thanks

Stuart Wallace

Public Space Officer

[Response: \(Note: As with Sports England above, the Penhale Camp pitch has been unused for over a decade, the local football club has been disbanded, and the pitch is outside of the parish and designated CNDP boundary\).](#)

[Further, as there is no definitive Cornwall Council Local Planning Authority guidelines or regulation for the provision of sports pitches/areas for parish council areas other than that for larger Cornwall towns, despite a Local Plan being in force since 2016, then without huge demand/aspiration found within the consultation \(and the expectation that those aspirations can be met\), then there is little point in including such an aspiration in a responsible NDP.](#)

[For context, any purchase and implementation of a sports facility to replace the lost army camp pitch will amount to many multiples of the annual precept of the parish council. Further, disappointingly, a recent application to build over the army sports pitch area has just recently be recommended for approval by the Local Planning Authority officers, against the concerns raised by the local residents and parish councils.](#)

[Response: NFA.](#)

04.10.2024.

Dear Michael and the NDP Steering Group

Thank you for providing National Highways with the opportunity to comment on the pre-submission draft of the Cubert Parish Neighbourhood Development Plan. As you are aware, National Highways is the strategic highway authority responsible for operating, maintaining and improving the strategic road network (SRN) which in this case comprises the A30 trunk road which passes some distance to south-east of the Plan area.

Having reviewed your draft Plan, and noting that the Parish is located some distance from the A30 with trips likely to disperse across the intervening highway network, we consider that the Plan's proposed policies are unlikely to lead to a scale of development which would adversely impact on the safe and efficient operation of the SRN, in accordance with DfT Circular 01/2022 The strategic road network and the delivery of sustainable development. We therefore have no comments to make.

However, this does not prejudice any future responses National Highways may make on site specific applications as they come forward through the planning process, which will be considered by us on their merits under the prevailing policy at the time.

Kind regards

Gaynor Gallacher

South West Operations – Assistant Spatial Planner (Highways Development Management)

[Response: NFA.](#)

28.10.2024.

Dear Michael,

Please find attached my letter, confirming the safeguarding position of the Ministry of Defence, in respect of the above policy planning Regulation 14 consultation.

In summary, the MOD must be consulted on any potential development within the statutory safeguarding zone surrounding the Military Training Area at Penhale Sands which consists of any building, structure or object which includes metal in its construction, or any large concentrations of buildings or industrial sites, and any soil engineering works which would raise or lower the height of the soil by more than 2m relative to the ground to ensure any such development proposals are compatible with defence capability and operational safeguarding requirements, in order that appropriate assessments can be carried out and, where necessary, requests for required conditions or objections be communicated. I trust this clearly explains our position on this update. Please do not hesitate to contact me should you wish to consider these points further. Yours sincerely C Waldron  
Chris Waldron  
DIO Assistant Safeguarding Manager

Kind Regards

Chris Waldron Assistant Safeguarding Manager

(Note: The military training camp, as well as the old Penhale Camp area is outside of the designated CNDP boundary area). NFA.

28.10.2024.

Dear Michael

Thank you for inviting comments on the latest version of Cubert's Neighbourhood Plan. I responded in more depth in February and can see some of my suggestions have since been acted on. I only have a small number of comments to make on the latest version:

- Coastal erosion and the SMP is now included. The Neighbourhood Plan confirms the parish's CCMA will align with the boundary of the Coastal Vulnerability Zone (CVZ) in the Climate Emergency DPD. This is clear, but you need to slightly tweak the following bit in red to allow for the possibility that some types of minor development or coastal uses like lifeguard huts might be appropriate in the CVZ. The 3rd paragraph says the "2016 SMP review recommended that a CCMA be defined at Holywell in order to prevent additional development or inappropriate changes of use." The sentence could instead say "in order to prevent inappropriate development or changes of use". That would align better with NPPF para 171. The important part is to state the CCMA will have the same boundary as the CVZ, which you've done. From a planning perspective the CVZ is a constraint area where a Coastal Vulnerability Assessment may be needed. From the community's perspective the CCMA is an area of coastal change where an adaptation plan will be needed.
- Please note that the EA are currently updating the National Coastal Erosion Mapping (NCERM) predictions. The new erosion lines are expected to be published in early 2025. The Cornwall-wide CVZ will be updated accordingly where the mapping has changed, so this won't affect the principle of Cubert's CCMA aligning with the CVZ. The text could be kept from dating by removing the sentence about the depth of the CVZ (250m from MHW), which could change in future updates.
- Flood risk (p.62). The last sentence is incomplete. I suggest amending the statement that "there's no significant fluvial flood risk" to the "development boundaries do not include any significant fluvial flood risk". The existing holiday park, pub, beachside cottages, campsite, beach access, children's play area and NT car park are all in Flood Zone 3 and visitors are likely to be more vulnerable because they won't be aware of the risk.
- Please note that the EA's flood risk maps are currently being updated, with the new maps due to be published from Spring 2025. See Updates to national flood and coastal erosion risk information - GOV.UK
- Policy TTA3 (additional parking) mentions a "Planning Access Statement". Does this mean a Design and Access Statement? A D&AS is needed for larger developments or development in designated areas, but I'm not sure this is where drainage plans should go. Having a management arrangement for SuDS is supported – check the wording with the Council's SuDS Officer if you haven't already done so. The policy could also encourage the use of permeable surfaces to reduce runoff.
- Policy HGS3 2 says the loss of protected habitats, including areas for NFM will not be supported. I'm pleased to see NFM is included in the protection. Policy 4 then gives exceptions when "unavoidable" loss of these areas will be supported, which weakens the protection. Check with the Planning Team if policy HGS3 4 is needed – the mitigation hierarchy and Biodiversity Net Gain (BNG) policies should already cover exceptions.

Bear in mind that selecting replacement sites for BNG might not compensate for lost NFM function if the offsite location isn't hydrologically connected to the area at flood risk. I suggest you add an advisory note: "Where offsite BNG is being proposed, consider if the flood risk management function of the habitat will be maintained in the new location (e.g. is it located upstream or upslope of flood risk areas?)." Developers could also check if any potential BNG areas also align with NFM opportunity areas (as identified on the WWNP map, NFM Studio tool or other local assessment).

- The community survey results found that 82 survey respondents wanted to see rainwater harvesting on new developments. This is more people than those who wanted electric car charging connections, which has a policy, but water conservation doesn't. The Climate Emergency DPD policy SEC1 has a policy for water saving which applies to dwellings and a rainwater harvesting policy for larger developments. You could consider including a policy encouraging simple water conservation measures for any other types of development and/or providing some examples as to the type of measures that could be included (e.g. water butts, aerated taps). It's much more practical to design these features in than to have to retrofit them later.

I hope you find that helpful and wish you well with the next stage of your plan.

Regards

Dionne Jones | Senior Environment Officer | Cornwall Council

Response: As stated above, the CNDP is not intended to mirror the national and countywide plans, and should not be a direct copy of those plans. Likewise, it is not for national or countywide organisations to expect the local CNDP Steering Group to write the CNDP in their own exact image. The Steering Group has considered the suggestions and recommendations provided and has also noted that water saving is already covered in the Climate Emergency DPD without need for mirroring. Electric charging points will remain in the NDP.

The “existing holiday park, pub, beachside cottages, campsite, beach access, children’s play area and NT car park” mentioned above are not within the designated CNDP boundary area, and are therefore not in the NDP. (Note: Cubert Parish Council applied for these areas (as well as the Penhale Army Camp) to be incorporated within the parish boundary at the latest Cornwall wide Boundary Governance Review, but Cornwall Council ruled against such inclusion, and against the 75% support from Cubert parish residents (768 letters of support from an electoral roll of 1026)). Perhaps a more realistic decision by Cornwall Council within the Governance Review would have allowed the inclusion of the suggested changes in this reply. NFA.

07.11.2024.

Dear Michael

Thank you for consulting the National Trust about the Cubert Neighbourhood Development Plan. I have reviewed the draft NDP (2.9.24 version) with colleagues, including Jon Stewart (General Manager, North Cornwall). We would like to offer the following comments and observations please, as part of the recent consultation / towards further preparations of the NDP.

The Vision for Cubert under section 2.1 includes positive aspects which we support, including the type of parish to live in, value of shared assets, such as rights of way, and support for wildlife and landscape conservation; we would however wish to see included specific mention of how visitors to the parish will continue to be welcomed.

We would be content to support where we can, the objective to reduce traffic congestion (queuing) on Holywell Road (item 16 under section 2.2), as this relates to visitor access to our car park by Holywell.

The Plan referred to as ‘Map 7’ in Policy TTA1 does not appear in the document. We consider that it is vital that full clarity/detail about the constraints and opportunities referred to in Policy TTA1 is provided in the NDP.

On page 35, the “National Trust Car Park Holywell” is stated to have 480 spaces, but it is actually 360 spaces including the overflow.

There does not appear in the NDP to be mention of extending access to the countryside and coast in the parish by way of new and improved permissive footpaths, bridleways, etc; we consider that it would be positive to see this supported through a policy in the NDP, as for instance this would help deliver several visions / objectives of the NDP.

We support the content of section 7.7 (Coastal Erosion and Flood Risk).

I hope this is of some assistance. In due course, please feel free to contact either myself or Jon should you wish for anything further from us. We would welcome the opportunity to comment on any further draft of the NDP.

Kind regards

David Jones, Assistant Planning Adviser

Cornwall & Devon, National Trust.

Response: Whilst there is general acceptance for support of footpaths and bridleways we feel there is little chance of extensions to the current footpath network in the parish unless through a Cornwall wide initiative. The NDP should only include achievable aspirations, and new/extended public footpaths did not come to light as an aspiration within the public consultation. The Parish Council is active in preserving and maintaining the current public footpath network, whilst Cornwall Council is the Authority dealing with any closure or block of public footpaths. The Steering Group therefore feels that protection of the current public footpath network is secure. NFA.

08.10.2024.

Good afternoon,

I hope you are well. Attached is consultee feedback from Public Health at Cornwall Council on Cubert’s Neighbourhood Development Plan.

Any questions or queries don’t hesitate to contact me and the team.

Many thanks,

Zoe Norman (she/her)

Intermediate Public Health Practitioner

Sexual Health Commissioning and Wider Health Determinants

Response: The reply from Cornwall Council Public Health includes comments and suggestions on 35 individual planning themes/features within NDP.

Sixteen of those features being assessed as “yes” included in the NDP, namely:

Increased walkability, improve infrastructure to support walking & cycling, increased access to facilities & amenities, improved street connectivity, urban food growing, provision of access to allotments and adequate garden space, improved air quality, exposure to air pollution, reduce impact of flooding, provision of access and engagement opportunities with the natural environment, tackle climate change, increased infrastructure for walking and cycling, encourage use of public transport, traffic calming measure, public realm improvements, access to recreational space.

Response: NFA.

Two of those features were not “ticked” as assessed in the reply: public realm improvements (e.g. provision of street lighting, cycle storage) and, retrofitting and energy efficient homes. There was no comment with the public realm improvements, but a comment was made that the “parish may benefit from considering quality of existing stock and retrofitting” - The Steering Group, whilst providing a Cubert Design Guide for new housing, does not consider that the NDP would be able to achieve any change to the existing housing stock quality or the retrofitting of existing housing.

Eight of the features were assessed as “unclear” including: compact neighbourhoods, provision of diverse housing types, excessive noise, aesthetic park improvements, participation in physical activity in an outdoor setting, prioritisation of neighbourhood tree planting, prioritise pedestrians and cyclists, active travel to work and school.

Response: the compact neighbourhoods “unclear” was not accompanied by any comment.

The Provision of diverse housing types – “the NDP would benefit from considering provision” - The Steering Group felt that the authority for this lay with the Affordable Housing Team at Cornwall Council, and that the team did not need a basic policy in an NDP to control the item.

Excessive noise – “The NDP could consider other ways to reduce noise pollution e.g. green infrastructure” – The subject was not shown to be an issue in the consultation with residents of the NDP designated area.

Aesthetic park improvements – “considering aesthetic park improvements” and participation in physical activity in an outdoor setting – “NDP could include how they will make the current space more accessible for teenagers, older people, and those who use wheelchairs beyond the current skate park” – The Steering Group believes that the current parish council owned QEII skate park, the toddlers and children area of Chapel Green, along with the Cubert Village Hall sports hall are already totally accessible by the age and ability groups mentioned, is continually funding and improving those areas, and does not believe additional mention in the NDP will improve this.

Prioritisation of neighbourhood tree planting – “The NDP could consider how tree planting will be prioritised in the parish” – The topic was not a large priority for residents in the public consultation, and the Steering Group does not see a priority need to include the topic in the NDP.

Prioritise pedestrians and cyclists – “the NDP commitment to support an additional carpark, whilst committed to enhancing footways, appears to contradict” – The public consultation raised concerns about the lack of parking (in certain areas), and the NDP also commits to enhancing footways (the parish has some dropped kerb for wheelchairs issues, as well as car parking problems). The Steering Group cannot see how NDP policies to cater for both perceived matters of concern cannot be included in the NDP, or are contradictory.

Active travel to work and school – “The NDP could mention in further detail how they are specifically encouraging active travel”. There has been significant complaints both before and during the time of the original designation of the NDP. The responsibility and Authority of relieving the gridlock around the local primary school lies with the local Education Department of Cornwall Council, the Highways Department of Cornwall Council, as well as the Parking Enforcement Department of Cornwall Council. The Steering Group cannot see how any policy within the NDP will ensure the various departments within Cornwall Council take the appropriate action necessary on the gridlock, and is disinclined to include a policy within the NDP which is unachievable. Cubert School regularly encourages the practice of walking to school, and the school would seem to be obvious organisation to take such action.

Nine of the features were assessed as “no” including: Provision of mixed use affordable housing, Provision of affordable rental housing, Provision of affordable housing for specific vulnerable groups, Provision of affordable housing for groups living with chronic conditions, Provision of housing for the homeless, Increase access to healthier food for the general population, Decrease exposure to unhealthy food environments, Increase access to healthier food in schools, Access to retail outlets selling healthier food.

Response: The five features centred around housing provision all state: “The NDP would benefit from considering provision of (the above mentioned types) affordable housing” – The NDP does not specify any specific areas for housing development within the CNDP Designated Area, it allows for the introduction of affordable led CLP Policy 9 Rural Exception Sites on the periphery of the Cubert and Holywell urban settlements, as and when applicable through individual planning applications. The Steering Group is aware that the in need requirement for affordable housing will vary by time. The responsible office for affordable housing lies with the Affordable Housing Team at Cornwall Council and the Parish Council liaises with that team with each application. The Steering Group considers the introduction of policies that might contradict the Affordable Housing Team recommendations for any specific housing type requirement at any unspecified time in the future would not be reasonable within the NDP.

The remaining four features concern healthier food and the access to that healthier food in schools, community access to healthy food in schools, and to healthy food outlets. All four state “The NDP could be enhanced by considering”, “assessing exposure”, and “support access to” healthier food. – The topic was not raised by residents in the public consultation for Cubert NDP, and the NDP Steering Group feels that it is the inappropriate platform to promote these topics in light of the lack of concern shown within the NDP consultation.

Please see the note(s) on NDP responsibilities at the start of Appendix 5.

28.10.24

Note that central Government are proposing revised mandatory housing targets, your NDP may need to reflect this revised requirement.

Response: Noted, the Government has yet to announce targets for Cubert Parish. When any new target is made, it will be for the LPA to provide any housing targets for individual parishes/towns. The NPPF does not suggest that the NDP is the mechanism. NFA.

Some of your objectives cannot be addressed through planning policy, suggest removal from the list of NDP objectives. Response: The objectives within the NDP are those brought forward from responses within the consultation process by local residents. Whilst these objectives may be unachievable within the NDP (but might be more likely achieved elsewhere), they have arisen from the public consultation and on balance, the Steering Group believes that this aspirations should continue to be noted within the NDP. NFA.

P35 this table has a number of objectives that cannot be delivered through the planning system and the tick in the policy column should be removed for objective 1, 5, 13 and 14.

Response: As above, these objectives resulted from public consultation and, on balance, the Steering Group feels that they should remain within the NDP, especially as they are not in conflict with the national or LPA policies. NFA.

H01 Development boundaries: - the boundaries and policies are fine in relation to existing housing target; however, if housing number requirements increase, these boundaries need to be reviewed to deliver sufficient housing to meet targets.

Response: This comment appears to be a mis-reading of HO1. Increased housing targets will affect most NDPs, which should be reviewed regularly in any case. The NDP defines the two sustainable Settlement Boundaries, and allows for reasoned Affordable Led Rural Exception Site housing in the future. The publicly consulted NDP does not identify any specific location for future increases in housing, and moving the defined Settlement Boundaries for unspecified future housing requirements (from Government or LPA) would be tantamount to allocating sites outside of the public consultation. There is already scope for additional housing through Rural Exception Sites, as allowed in the NDP. NFA.

H03 Preventing Coalescence: - Note comments above about potential increased housing numbers; you will need to demonstrate how and where any increased housing requirement can be delivered.

Response: The Steering Group notes the wording “WILL NEED” in the comments. (As above), the NDP allows for suitable Rural Exception Sites surrounding the two main parish settlements boundaries. The Steering Group would question where the text “WILL NEED” lies within the Government’s policy. NFA. Unless requested text is provided.

H04 Principle Residence: - The examiner is likely to ask for evidence of the impact on second homes. Providing narrative about how the growing proportion of second/holiday homes is affecting the community. That would be really helpful. I’d suggest reviewing the (PRP) maps and redrawing.

Response: The issue and reports of growing populations of second/holiday homes affecting local communities are legion, nationwide. Public responses to Q19 of the parish survey shows only a very small desire for such homes. The 64% (yes) versus 11% (no) public response Q21 for all new developments to be principle residents is evidence of the disquiet on further growth of second/holiday homes. Further, the 69.6% (strongly agree/agree) versus 9% (disagree/strongly disagree) public response to Q5 “Primary Residence restriction” is evidence of the same disquiet in the local community. Having conscientiously considered the supplied comments, the Steering Group can see no reason to seek further proof of the effects of growing second/holiday homes on the local community, when such evidence is totally made clear both nationally and within Cornwall, (the LPA specifically imposes extra council tax surcharges on such homes, for example), as well as that seen within the NDP and Consultation Statement (as shown in Appendix 3 and 5 above). Multiple numbers of empty homes out of the short summer season, along with the closures of retail outlets through the years, all point to the obvious effect additional second/holiday homes bring to the parts of the community targeted with this policy.

The Steering Group has reviewed the PRP maps, and believes the circle method is the most obvious and easiest way to identify and consider the areas concerned. It avoids identifying individual residents’ boundary fences/gardens. The NDP is written to include all residents, not to find individual discord by following individual garden fences etc. NFA

B1 Supporting a year round Sustainable local economy – There is very little scope within the development boundaries so this policy is potentially quite restrictive. Suggest including “or well related to”. The bullet points after f) should be sub bullets? Part 2 is similar to policy AG1 in the Climate Emergency DPD; suggest that you reference that policy.

Response: The Climate Emergency DPD was not raised or referenced during the public consultation. The policy B1 part 2 does not contradict the NPPF, CLP, or the Climate Emergency DPD. Whilst the Steering Group considers that the Climate Emergency DPD does sit well with the proposed NDP, it was not raised within the public consultation, and would not wish to include any Reference post consultation. NFA.

TTA1 Improving Transport, Accessibility and Connectivity – Include a link to the Transport Accessibility and Connectivity Plan referenced in the policy. Add reference to Cornwall Streets for People Design Guide.

Response: Link added, and reference made. NFA.

HGS1 Protecting Landscapes, Historic Character, Views and Vistas – Minor amendment to “Identified on map 11”.

Response: Amendment made. NFA.

HGS2 Local Green Space – The map reference is incorrect and should refer to map 12.

Response: Reference changed. NFA.

HGS4 & 5 Protecting Trees and Cornish Hedges, Development and trees and Cornish Hedges – These (two) policies are covered by Policy G3 Canopy in the Climate Emergency DPD and suggest removal of policy HGS5 & 5 if this addresses concerns.

NDP Team

Response: As with B1 above, the Climate Emergency DPD was not raised or referenced in the public consultation. Policies HGS4 & 5 do not contradict the Climate Emergency DPD, but will, in their turn, help protect the trees and Cornish hedges within the parish, as standalone protection. NFA.