



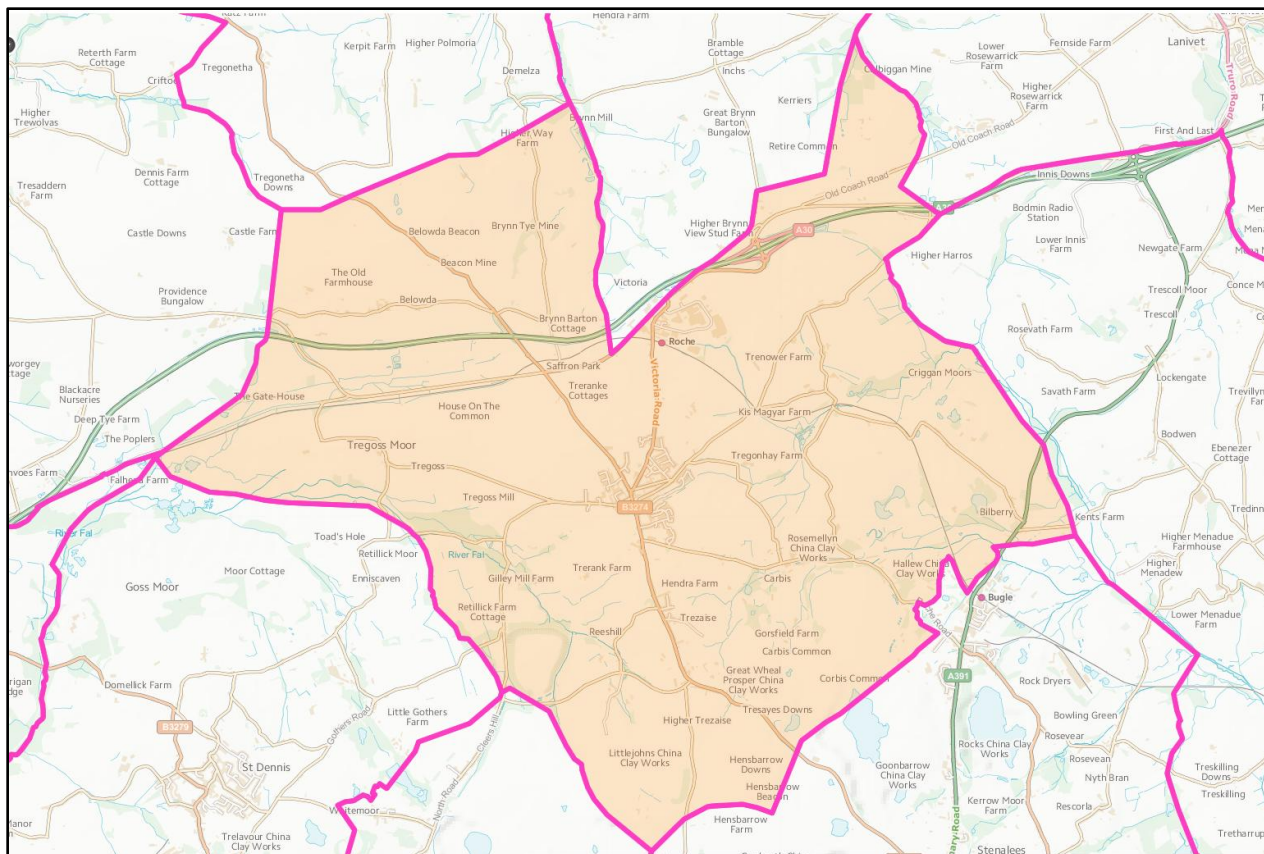
Roche Parish Neighbourhood Plan Consultation Statement



‘Supporting a thriving parish to meet local needs, and enhance its character and distinctiveness for a sustainable future.’

May 2016

ABOUT INITIATING ROCHE NEIGHBOURHOOD PLAN



Above: Roche Parish.

Roche Parish Council took the decision to initiate a Neighbourhood Plan covering the Parish Council area (Appendix 1) at its monthly meeting on the 11th July 2014, inviting local resident Lord Matthew Taylor of Goss Moor to chair the proposed Neighbourhood Plan Steering Group.

The decision was triggered by great concern expressed within the community about a number of issues, especially: The fast pace of what was perceived as low quality development in the parish (the village doubling in size in little more than a decade); the threat to valued community green spaces, strategic views, and the local environment of poor quality development; and the impact of very heavy traffic (especially HGVs) through the village.

Roche Parish Council applied to Cornwall Council on 11th July 2014 to designate the Parish of Roche as a Neighbourhood Area under Part 2 (5) (1) of the Neighbourhood Planning (General) Regulations 2012. (Appendix 2).

Cornwall Council consulted residents and other interested stakeholders on this application between the 23rd July and the 3rd September 2014, advertising the proposed designation in the Cornish Guardian on the 23rd July 2014. (Appendix 3). The designation was duly made on 5th September 2014 (Appendix 4).

A SHORT NOTE ABOUT ROCHE

Roche is a civil parish in mid-Cornwall surrounded by old clay mining settlements, located 6 miles from St Austell on the south coast and 12 miles from Newquay on the north coast. Roche village gets its name from a granite outcrop east of the village with Roche being the Norman-French word for rock. The rock, with its medieval chapel on top, and the medieval Roche Church tower nearby, define the local skyline.

The population of Roche is 3381 (2011 census ([Appendix 5](#))). Over the past 25 years the village has experienced strong growth in its population (doubling in size) and has expanded its housing beyond the traditional limits of the village.

Current transport links to the village consist of easy access to the A30 trunk road to the north, a branch line railway station connecting Roche with Newquay and Par and an hourly bus route connecting with Bodmin and Truro. An HGV passes through the village on average every minute of the day.

THE INITIAL NEIGHBOURHOOD PLAN STEERING GROUP

The steering group was set up by the Parish Council after its meeting on 11th July 2014.

Lord Matthew Taylor

Former Member of Parliament for Truro and St Austell for 23 years, he has advised successive Governments on planning policy. He is Visiting Professor of Planning at Plymouth University, President of the National Association of Local Councils, to September 2015 Chair of the National Housing Federation, and offers planning consultancy.

Cornwall Councillor John Wood

Sits on Cornwall Council and represents the Roche electoral division as an independent. He is Chairman of Cornwall Council.

Rev Ruth Murfitt

Reverend of Roche Parish Church. Acted as Deputy Chair of the Steering Group.

Cllr Irene Northey

Roche Parish Council Councillor, longstanding local resident.

Dennis Barrasin

Member of the local Royal Legion Riders, a British Army veteran and long standing local resident.

Mike Tregaskes

Retired school teacher, long standing resident of Trezaise.

Julie Burdon

Parish Clerk - provided administration support to the steering group.

INITIAL PUBLIC MEETING – SEPTEMBER 22ND 2014

The Steering Group first met on Thursday 7th August 2014, to agree first steps.

It was decided that a public meeting should be held to invite support for the creation of a Neighbourhood Plan. The Public Meeting was organized for the evening of September 22nd 2014 to take place shortly after the Neighbourhood Plan designation was expected to be formalised.

To advertise the public meeting a leaflet was distributed door to door throughout the Parish, explaining in brief that a Neighbourhood Plan was proposed, what a Neighbourhood Plan is, and the kind of issues it could address (Appendix 6). In addition posters (A3 and A4 versions of the front page of the door to door leaflet) were displayed in local shops and on telegraph poles, and banners erected outside the Victory Hall (where the meeting would take place) and the Church. The steering group also commissioned a Roche Neighbourhood Plan website.

The public meeting was held on the 22nd September 2014 in Victory Hall which was packed to capacity with people from the Community as well as Parish Councilors, County Councilor and the Steering Group members. The meeting was attended by over 250 people.



At the meeting maps of the Parish were displayed explaining the Parish area, and literature and maps circulated (Appendix 7) showing the sites proposed for development in Cornwall Council's Strategic Housing Land Availability Appraisal - sufficient for approximately 636 homes in addition to the 191 homes already completed and the 61 homes committed (at that time) since 2010, the start of the draft Cornwall Local Plan Period 2010-2030.

As well as displaying material about Neighbourhood Planning, the Parish and some of the likely issues, there were explanatory speeches from the Parish Council Chairman (who chaired the proceedings), Cornwall Councillor John

Wood, Rev Ruth Murfitt, and Lord Taylor. In addition, Cornwall Council planning officer Sarah Arden (at that stage our Neighbourhood Plan support officer) was invited to speak to explain the formal process.

A question and answer session followed, and an overwhelming (unopposed) vote of support was given to the proposal for a Neighbourhood Plan to be drawn up in consultation with the community (the vote is pictured below). From the start, three key issues predominated – the need to ensure proportionate and high quality development; the need to protect locally loved green spaces, views, and the natural environment; and the critical need to if possible address what was seen as the danger and blight of the very heavy traffic through the main settlements.

The meeting raised £116.13 in a spontaneous collection, despite their being no formal fundraising. Sarah Arden of Cornwall Council's Neighbourhood Planning department described the meeting was outstanding and by far the way the largest turnout she had seen for a meeting of this kind.



Pictured: Residents vote unanimously in support of the proposal to create a Neighbourhood Plan

EXPANDING THE STEERING GROUP – SEPTEMBER 2014

At the first (September) Public Meeting the Chair extended an invitation to anyone interested to join the steering group (or to let him know if they knew someone who they felt should be approached), with an emphasis on expanding the range of members to represent the community as a whole, and bring in any specific relevant skills, and a more mixed age group.

As a result the following members of the community approached Lord Taylor, and were duly added (with the agreement of the Parish Council) to the Steering Group:

Joshua Boughton

Local young resident, studying at Cornwall College

Steven De'ath

Self-employed land agent, formerly worked for the largest local affordable housing provider (Ocean Housing).

Rob and Holly Hocking

Officers with the Environment Agency, living in the Parish. They effectively treated the role as a 'job share' due to young children (including a baby born during the consultation and plan drafting period).

Daniel Inch

A Senior Manager with a large scale national food distribution company operating locally, a resident, and a member of the Roche Victory Hall Social Club committee. During the work of the steering committee he became a Roche Parish Councillor.

Naomi Jackman

A local resident and school teacher, with a geography degree and interest in social media.

Graham Rowe

Long standing Roche resident, formerly worked in Restormel Borough housing team on affordable housing delivery, and has undertaken some small scale development himself prior to retirement.

Martin Tippet

Chair of Governors at Roche CP School – was unable to attend meetings but was included in all emails as a member of the Steering Group

Additional support was also added for the steering group:

Nick Prescott

Researcher to Lord Taylor, working in the Parish, providing support with literature, community consultation, and research for the evidence base. Nick was able to work on the Neighbourhood Plan process until Autumn 2015, when he took a new job based in Exeter.

NEIGHBOURHOOD PLAN ADVISORS

In addition to the support throughout of **Sarah Arden**, Cornwall Council Plannign Officer (leading the Neighbourhood Planning team for the Council), the Roche Neighbourhood Plan Steering Group also drew on specialist advice from:

Colleen O’Sullivan

Colleen is a qualified planner, and was appointed by Cornwall Council in September 2015 during the Roche Neighbourhood Plan process as our support officer, working to Sarah Arden but providing a more extensive level of support. She and colleagues at Cornwall Council have provided detailed advice and drafting support throughout the development of the Roche Neighbourhood Plan.

Paul Tucker QC (Kings Chambers)

Paul has worked with Lord Taylor assisting in the development of national planning policy, and offered to provide his advice and support pro-bono to the Roche Neighbourhood Plan steering group. He has reviewed and revised all of the policy proposals and justifications in the Neighbourhood Plan at each stage, for which free contribution the Steering Group is especially grateful.

AECOM

Planning support was funded by Locality and delivered by AECOM to undertake the necessary Sustainability Appraisal/Strategic Environmental Assessment, and (funded by the Parish Council) the Habitats Regulations Assessment screening.

NEIGHBOURHOOD PLAN COMMUNITY CONSULTATION FIRST SURVEY – NOVEMBER-DECEMBER 2014

Following the success of the public meeting, the steering group held regular meetings every two to four weeks. A Neighbourhood Plan website was used to keep people informed, as well as Facebook and Twitter accounts, with regular updates, links to evidence, and the opportunity to respond to surveys online and contact the Steering Group. Press coverage was also achieved through issuing press releases ([Appendix 8](#)), which also appeared as articles in the Parish magazine (though this sadly stopped publication in late 2015).

Once the Government put in place new funding (it had run out in August 2014 just as the Steering group was formed) an application was submitted for grant funding from Locality to support the work of the Steering Group, primarily for community consultation.

Meanwhile Parish funding allowed a first household survey to be quickly organised so that this could be designed, printed and distributed while the idea of a Neighbourhood Plan was still fresh in the village. Meanwhile, in advance of the survey being printed and distributed, through October 2014 an ‘update newsletter’ ([Appendix 9](#)) was displayed throughout the community on notice boards, in shop windows, in community buildings, and (laminated) on lamp posts, letting people know what was happening and that a survey was imminent.

The survey itself ([Appendix 10](#)) was designed in the format and size of a ‘tabloid newspaper’, in full colour and with clear, simple questions. It included a map of the Parish, and a map showing all the SHLAA sites proposed in the Parish – and the opportunity to express preferences on these, and a wide range of other issues, as well as add any other comments.

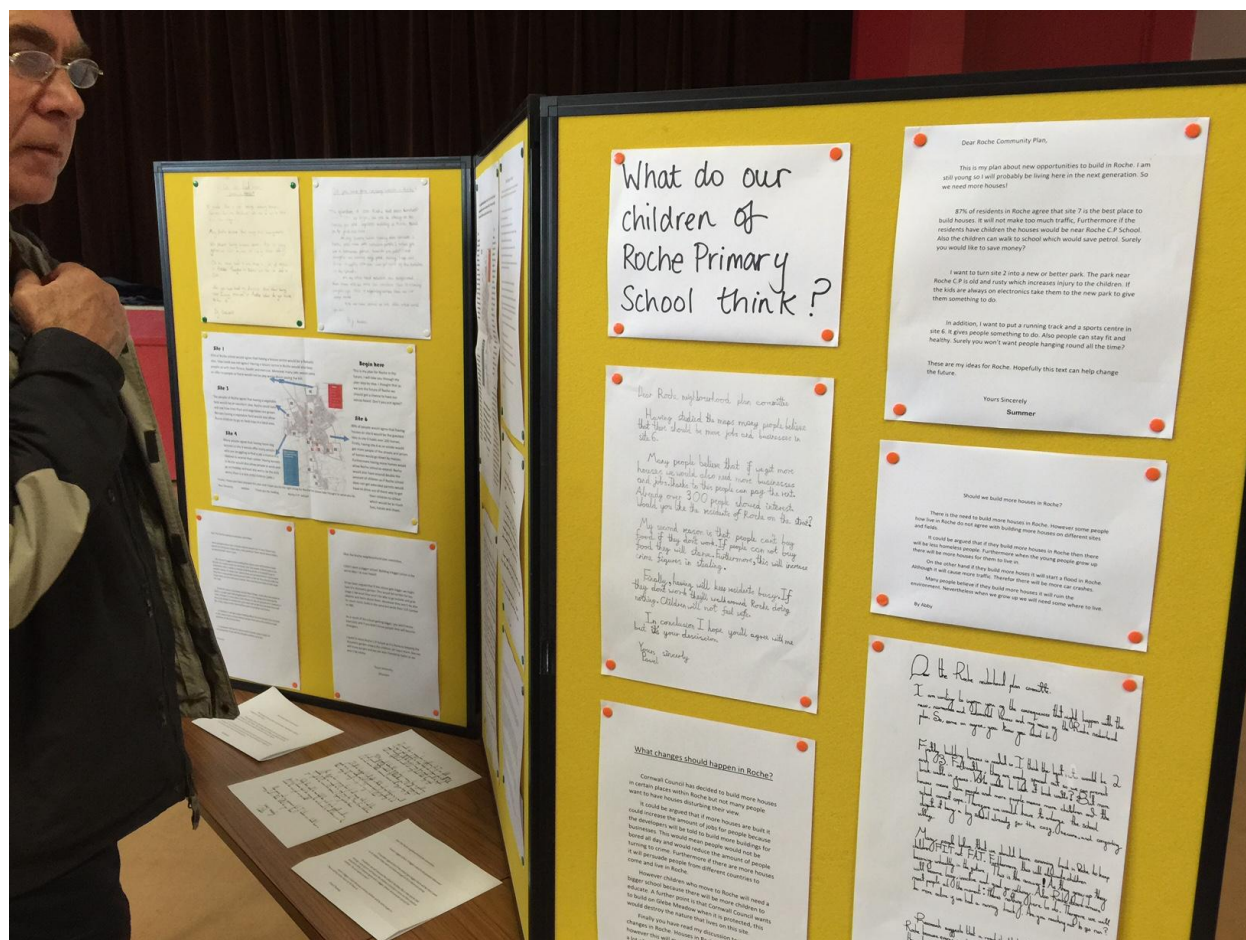
This first Neighbourhood Plan survey was delivered by a network of volunteers coordinated by Nick Prescott in early November 2014 with a closing date of the 14th December 2014 for completed survey returns. Each household received a copy of the survey and had the opportunity to either drop their return in one of the boxes provided at the Post Office and the Roche GP Centre, or by post or hand to the Parish Clerk. The survey was also converted into a web form on the website which people could fill out and submit online.

Posters were again displayed throughout the parish (in shops and other community facilities, on lampposts, notice boards etc.) reminding residents to complete and return the survey by the deadline ([Appendix 11](#)). In addition twitter and Facebook was used extensively to prompt responses, and press coverage (prompted by press releases) in the Cornish Guardian and in both the St. Austell and Newquay Voice.

In total, 300 people completed a survey which equated to around a 20% household return rate, far above the average for a public survey of this type. The detailed results are set out in [Appendix 12](#).

In order to increase the reach of the Survey, five ‘sub-survey’ efforts were conducted:

1. **Roche CP School:** The Steering Group Chair, Matthew Taylor, arranged with the primary school to come in and speak about the plan and the issues being considered for the future of the village, and a simplified set of questions. The oldest pupils (aged 9-11) took part, and in response to the interest it sparked the School organized a special lesson subsequently where pupils wrote personal letters to the steering group explaining their wishes for the future and views on the key issues raised. Some of these responses were displayed at the subsequent ‘results’ event held in the New year, again at the Victory Hall



2. **Brannel Secondary School:** This secondary school serves Roche Parish. Matthew Taylor arranged with the Head Teacher that teachers would explain the Plan process to students, and then the same survey forms sent door to door to households would be issued by the school to all those pupils at the school with a Roche Parish address. 83 Students responded and these responses were separately collated, and a full report ([Appendix 13](#)) and a comparison report prepared for the Steering Group ([Appendix 14](#)).
3. **Local Businesses:** A special business survey letter (with some business focused additional questions – [Appendix 15](#)) explaining the Neighbourhood Plan process and enclosing the main survey was delivered by hand to each business in the Parish, inviting comments. Only one response returned the business survey letter itself, but other business owners returned the main survey.
4. **Minorca Lane:** What originated as a large (only partly authorized) Gypsy/Traveler site exists on the edge of Bugle but within Roche Parish at Minorca lane. By the time of the initiation of the Neighbourhood Plan this had however almost entirely ceased gypsy occupation, and instead is now rented accommodation used by eastern European migrant workers and some of their families, mostly from Lithuania and Poland. At the time of the survey the County Council was in the process of regularizing the large elements of unauthorized development, and actively engaging with the community to better identify their needs and address them. The County team conducting this work was approached, and the Survey form (with an explanatory letter available in the appropriate languages, [Appendix 16](#)) distributed door to door by the County team together with the County's own more focused survey as part of their community engagement. This involved not just delivery, but door step engagement by County staff. Although ensuring the community was informed of the Neighbourhood Plan process and consultation and had the opportunity to input, the outcome did not lead to specific issues being raised with the Neighbourhood Plan steering group, but the many more community issues raised informed the Cornwall Council team's work on improving facilities within Minorca Lane (e.g. child care, meeting room, tackling substandard accommodation, regularizing the planning status of dwellings which is now complete).
5. **Land owners in the SHLAA/Cornwall Council.** All landowners/agents who had proposed their land to the Cornwall Council SHLAA were individually approached, and met by Matthew Taylor and one other member of the Steering group to be given a copy of the Survey. The process was explained, and representations invited. Similarly Cornwall Council was proposing its own land at Trezaire for affordable housing as part of Cornwall Council's affordable housing PFI, and they were also contacted. In each case the appetite of the landowner to pursue their proposed site through the Neighbourhood Plan was discussed.

THE FIRST CONSULTATION SURVEY RESULTS

The results of the first consultation survey were collated and discussed in detail by the Steering Group, and published on the website, enabling both early thinking to develop on the key issues that the Neighbourhood Plan should address and further community input.

Two new matters were particularly highlighted by this process:

1. At the initial public meeting, in survey responses and in discussions, the Steering Group became aware of three sites (including sites B and C in the eventual Neighbourhood Plan allocations) in or adjacent to the northern end of the village that it was believed landowners might be willing to develop if the community supported it and which were well connected to the central Roche Village area with its community services, shops etc. As a result these land owners were approached in the same way as the SHLAA site owners. The landowners expressed initial interest, so the steering group felt it was appropriate that these three sites should also be considered, and added to subsequent community consultations.

2. Critically, at the first public meeting and in all further feedback, concern about the very heavy traffic through the village was being raised as a high priority for the Neighbourhood Plan to tackle if possible. Ideas on this were discussed, and two options suggested:

a) Longstanding County plans for a St.Austell-A30 link road east of Bugle had never been achieved due to financial unviability. Could a route east or west of Roche achieve a shorter less costly solution, which also picked up both the traffic between St. Austell and Newquay, and the heavy vehicles diverted to Roche from the western side of St. Austell and the Clay in order to avoid St. Dennis (which is unsuitable for HGV traffic)? Could the potential for further development within Roche Parish be unlocked if a traffic solution was achieved and this help the economics of the road solution – and could the Neighbourhood Plan support this?

b) Alternatively, could HGV traffic at least be diverted around Roche and Trezaise if a new short link road could be achieved between Harmony Road and Edgcombe Road as a result of permitting further housing development in this ‘triangle’ (site D in the eventual Neighbourhood Plan policies)? The landowner (Tregothnan Estate) had already suggested two areas that comprised most of this area to the SHLAA, and was approached as part of the initial discussions with SHLAA land-owners, and was agreeable in principle.

Initial discussion was therefore held with Cornwall Council Planning and Highways officers to explore the theoretical possibilities above. This achieved a strongly positive response, Cornwall Highways and Planning officers indicating they were already seeking new solutions to the traffic issues between the A30 and St. Austell, and that the options we raised appeared to have potential and would be considered in their own work on this, as they were developing a scoping study. On this basis the Steering Group to agree these options should be raised in the ‘results consultation’ material.

THE RESULTS LEAFLET AND SECOND PUBLIC ENGAGEMENT EVENT

A results leaflet was created in January 2015 (Appendix 17). Again this was produced in full colour and in a large ‘tabloid newspaper’ format, clearly setting out the key consultation results, inviting feedback, and advertising a further public consultation event (this time a drop-in, all day event) to hear more about the survey results, discuss with Steering Group members their thinking, and input ideas and reaction. It flagged for the first time that the public consultation event would raise the possibility of a Roche ‘by-pass’.

The second public consultation event took place on Saturday 28th February 2015 at Victory Hall in Roche and presented an opportunity for members of the public to see more details of the first Public Consultation survey outcomes, talk to members of the steering group, and generally find out more information about the Neighbourhood Plan and its progress and give views.



As well as advertising the public meeting, the main objectives of the second door-to-door ‘tabloid’ publication were to present the previous survey results to Roche residents unable to attend the all-day event, provide continued engagement with the public to maintain momentum, flag the ‘bypass’ possibility, and allow feedback. Once again, the leaflet was delivered to every door by a group of volunteers coordinated by Nick Prescott.

In addition to the door to door tabloid, a large outdoor vinyl banner was designed and printed to advertise the event (Appendix 18) and this was hung up outside the venue next to the main road for two weeks leading up to the event. Additional posters were printed and again displayed on lamp posts, shop windows and community premises and notice boards. For the event itself, a substantial display was organized. Nine vinyl pull-up banners were designed and printed for the event (Appendix 19) which featured the survey results and introduced the steering group’s ideas for options for getting heavy traffic out of the built Roche/Trezaise settlement, reflecting the degree to which all the consultation material and the inaugural meeting flagged this as a key issue for residents.

Initial discussion about the potential for a traffic solution on these lines had been opened with Cornwall Council, so the material was informed by those very preliminary discussions and included explanation that to make the economic case for a full ‘bypass’ (St. Austell link road) or achieve a short road section allowing an HGV diversion, an extra allocation for homes and business growth might be needed (additional to those homes needed to meet Cornwall Council Draft Local Plan requirements for Roche). Therefore this potentially controversial ‘trade off’ could begin to be tested with local residents – and received overwhelmingly positive feedback, caveated by concern that extra development (additional to that required by the draft Cornwall Local Plan) should only be agreed subject to a) its necessity to resolve the traffic issues, b) sufficient school places being available for any extra children, c) high quality design, and d) suitable traffic calming and paving to deter rat running through the village.



The event was a great success and had around 200 people through the door on the day. A short supplementary survey form (Appendix 20) was given to all those attending, with 94 of these supplementary survey forms returned (many attending were couples and family groups, and each couple/family generally filled out one survey form between them). The results were presented to the next meeting of the Steering Group (Appendix 21).

THE NEIGHBOURHOOD PLAN SECOND CONSULTATION SURVEY

In April 2015 another survey Appendix 23 (accompanied by a covering letter Appendix 22, and a housing needs survey Appendix 24)) was created to explore further the ideas emerging from the first public survey plus the consultation event and its sub-survey, and informing the initial thinking in response by the Steering Group.

In particular the Steering Group wanted to better understand community views on some key issues:

1. The first survey had not achieved clarity on community preferences between the SHLAA/Cornwall Council housing sites, but had generated suggestions of further sites to consider better related to the centre of Roche Village. The second survey and covering letter (Appendix 23 and 24) therefore re-presented the SHLAA/Cornwall Council sites but added the three further sites identified by the community feedback (yellow sites a, b and c on the survey form) , and asked if the community agreed the emerging preference for these sites. It also asked views on the then two emerging sites identified as green spaces the community wanted protected, and views on some of the other site related issues raised so far.

2. The main survey set out for the first time to the whole Parish the emerging possibilities for getting traffic out of Roche (and possible associated to development tradeoffs) and asked for views. This was informed by the preliminary discussions with Cornwall Council, but not endorsed by them (though we understood they were in fact initiating their own preliminary options work on solutions to the traffic issues arising from the St.Austell-A30 route corridors).

In addition, the steering group obtained advice on affordable housing needs in the Parish from both Cornwall Council and Ocean Housing Association (the former Restormel Housing stock transfer, and largest local affordable homes provider). Both highlighted the housing register, but Ocean provided further back ground: Recent new affordable housing built in Roche village had in practice been hard to fill from local needs in the Parish, and was not first preference for many others due to the relative isolation of the Parish from employment and facilities in St. Austell, Newquay and Bodmin. Moreover the large existing affordable/social rent stock in Roche meant that turnover generally met immediate needs. Ocean Housing stated they would not consider housing development in the Parish – neither affordable, due to low demand, nor market housing due to very low demand and values given the amount of recent development: the original developer of the largest recent development had gone bust, and the current developer (RS developments) had sites permitted on which it had at that time ceased building activity (though more recently this resumed after changes to the permission to improve viability).

Cornwall Council informed the steering group it was not going to pursue its suggested affordable housing site at Trezaise (site 9) but would seek suitable alternative(s) elsewhere in the County. Additionally, Cornwall Council had flagged that to achieve the transport solutions being considered, developer contributions might have to prioritise transport contributions over affordable homes.

Meanwhile, community consultation feed-back suggested there was local demand for self-build plots, as a route to relatively affordable home ownership.

Given all this, the Steering Group agreed that we should supplement the housing need evidence with our own detailed housing need survey. This was drawn up with advice from Cornwall Council, and circulated together with the more general second community survey document.

Unlike the previous two ‘tabloid’ publications, these two new survey forms (together comprising the second community survey) and the covering letter were delivered by Royal Mail to each household in the Parish. This the steering group felt would ensure that any households that might previously have been missed by volunteers delivering door-to-door should be included this time, guaranteeing everyone had the opportunity to have their say.

The survey was delivered at the beginning of May, with a return date of 25th May. Once again the surveys could be delivered to boxes at the Post Office and the GP Surgery, by post to the Parish Clerk, or completed on-line. As before posters were used in the village to encourage returns, as well publicity via Twitter and Facebook.

SECOND COMMUNITY SURVEY RESPONSE

Again there was a very strong response rate to the second survey, with 221 of the main survey forms returned this time, a household response rate of over 15%. The housing needs survey which was more complex, and primarily aimed at identifying housing needs, received a remarkably high return rate too – 203 forms returned.

The new survey report ([Appendix 25 and 26](#)) strongly supported the feedback from the community engagement event on the 28th February, and the emerging views of the Steering group:

- Over three quarters of respondents supported pursuit of a bypass solution, notwithstanding this might mean more housing needed to be permitted than otherwise would be the case.

- There was strong support (78%) for two of the new sites (not in the SHLAA) that had emerged through the community consultation process (allocated as sites B and C in the eventual Neighbourhood Plan, but A and C in this survey), and the owners of both sites indicated they were willing for the sites to be proposed and to accept the preferences of the community for relatively slow build out, low density, high quality and where possible some self build). The owner of the other new site (B in the survey form) had meanwhile indicated they did not wish to pursue residential development of their site in the foreseeable future. Of the remaining (SHLAA) sites, the most popular was the small glebe site beside the cemetery (allocated as site A in the eventual Neighbourhood Plan).
- The two sites at this stage proposed for designation as community green space had 84% support (the Old Glebe Field and the Old Fairground sites). The other two sites in the eventual Neighbourhood Plan (the Duck Pond and the Sports Fields/Park complex) emerged through community and Councillor suggestions arising from their absence in this survey.
- Adequate pavements (especially Victoria Road) and school places received continued high emphasis.

The housing needs survey gave the opportunity for residents to highlight their own unmet housing needs, or the needs of family or other contacts. The outcome (Appendix 27) (bearing in mind the high return rate for a survey of this sort) supported the feedback from Ocean Housing and others regarding the relatively low unmet housing needs in the community. Of the 201 forms returned, very few indicated housing need either now or anticipated in the next five years:

- Twelve forms indicated people ‘knew’ of someone who would wish to return to the village if suitable accommodation was available. They were asked to give contact details so these people could be sent the housing needs survey. Only six indicated names (some of the other five may have been an expression of ‘anecdotal’ belief of such need, given the phrasing of the question, but one wanted a property to rent (either affordable or private) to allow an adult to live independently. Of the six giving a name, one wanted a self-build opportunity, two affordable rent, and one eventual private purchase for their child, one an unspecified tenure for their child in the future, and one a property of any tenure including to buy.
- Two others were adequately housed but expressed a wish to move from the private sector (one a private owner, the other in private rent) into affordable rent on cost grounds.
- Five others expressed a general wish to move within the village to downsize or for better affordability.
- In all, just 2% (4) out of 201 forms clearly expressed a wish for affordable rent and at least half of these were adequately housed but hoped to cut their costs.

In considering these results, the steering group felt they reinforced the information provided by Cornwall Council and Ocean that social rented accommodation was not an especially high need in the village.

EMERGING NEIGHBOURHOOD PLAN AND STRATEGIC ENVIRONMENTAL ASSESSMENT

On the basis of the further community consultations (February Consultation event and the May survey, contact with landowners and other interested parties the substantial evidence base examined, and input from Cornwall Council and others), a clear understanding of local needs, preferences and priorities was therefore emerging by summer 2015. The steering group also involved for the first time the pro-bono support of Paul Tucker QC, who advised on the initial thinking and how this could be taken forward.

A first summary outline was therefore produced of the emerging Roche Neighbourhood Plan, setting out draft recommendations (Appendix 28). This was produced with detailed help from our QC and Sarah Arden (our Cornwall Council advisor/support officer).

Early work had taken place on a Sustainability Appraisal by members of the Steering Group (Steve De'Ath, a land agent, supported by Rob and Holly Hocking, both Environment Agency staff). However, with the emerging policies including specific allocations, and given the significant environmental designations in the Parish, it was agreed the steering group should seek further Locality funding for technical support for the Sustainability Appraisal to be taken over professionally. This funding was secured and AECOM appointed.

We also sought on the advice of our QC and Cornwall Council officers a Cornwall Council screening for SEA based on our draft 'emerging policies' statement, with the possibility the AECOM work would become a joint SA/SEA assessment. This SEA screening opinion report was requested from Cornwall Council on the 4th June 2015. For the Council, Sarah Arden (Principal Development Officer, Strategic Planning Policy) produced a draft screening opinion for the Roche Neighbourhood Plan and consulted the required statutory bodies, Natural England, Historic England and the Environment Agency.

Having considered the consultation responses, on 24th July 2015 we received the Council's draft opinion that Strategic Environmental Assessment was required (Appendix 29), including the responses from Natural England, Historic England and the Environment Agency. This conclusion was based on the sensitive natural assets within Roche parish and the fact that the plan will contain site allocations – and there being a potential for a large site which would exceed the quantum of development envisaged for the area in the emerging Cornwall Local Plan. Whilst Natural England commented that significant environmental effects were unlikely, they qualified this by saying that sufficient information was required to assess whether protected species are likely to be affected. Carrying out the SEA would enable this to be assessed and so ensure that the Neighbourhood Plan meets the Basic Conditions.

NE also commented in respect of Habitat Regulations Assessment (HRA). They said that as the plan progresses, if the link road option is progressed this would need to be screened for HRA. However Natural England confirmed that if the separation distance of the road from Breney Common and Goss and Tregoss moors SAC is greater than 200m, the conclusion will be 'no likely significant effect' - so appropriate assessment would not be required.

Locality support was therefore sought and secured for the steering group to extend AECOM's brief to produce an SEA incorporating the SA work. AECOM staff over the summer visited Roche, met with members of the steering group, and assembled their own evidence base analysis with input from the Steering Group.

The AECOM SEA scoping report was issued 16th September 2015 to the consultation bodies (Historic England, Natural England and the Environment Agency), with a consultation period to the 21st October (Appendix 30).

Their final Environmental Report (Appendix 31) was sent to the Steering group on the 12th December 2015, and as AECOM commented in their covering note: ***"As the Environmental Report clearly demonstrates, the RNP in its current form brings numerous sustainability benefits for the parish, relating to a range of themes. So the Environmental Report should read as very supportive in this respect."***

Conclusions at this current stage

Potential significant effects

7.9.1 The appraisal has concluded that the current version of the RNP is likely to lead to **significant positive effects** in terms of the 'population and community' SEA objectives. These benefits largely relate to the carefully targeted spatial approach proposed by the draft plan, the focus on improving the quality of life of residents in Roche, the impetus on promoting enhancements to the public realm and the RNP's focus on protecting and enhancing green infrastructure and supporting enhancements to transport networks.

7.9.2 In terms of potential negative effects, there are likely to be some minor effects on landscape and townscape from new areas of development within and on the edge of Roche associated with the allocation of the three sites through the RNP. However, central to the Neighbourhood Plan is the protection and enhancement of the historic environment, the public realm and landscape /

townscape character of the parish. When combined with the opportunities offered by the proposed bypass associated with the proposed A30-St Austell link road, this has the potential to lead to **significant positive effects** in Roche village in relation to the ‘historic environment and landscape’ SEA objectives.

7.9.3 In relation to potential effects on biodiversity, negative effects are likely to be limited by the policy approaches put forward through the RNP. Whilst the proposed sites for housing allocations are located in relative proximity to the internationally and nationally designated biodiversity sites present in the parish, any adverse effects on these sites are likely to be limited by the proposed size of the allocations. This is reflected by the allocations not being located within an Impact Risk Zone for the SSSIs for the type and scale of development being proposed.

7.9.4 Whilst the draft plan approach will help initiate a range of beneficial approaches in relation to ‘climate change’ theme (including in relation to mitigation and adaptation) and the ‘land, soil and water resources’ theme, these are not considered to be significant in the context of the SEA process.

Only two recommendations were made:

1. The assessment highlighted that no significant effects are likely to result from the draft plan on the internationally and nationally designated sites present in the parish. However the potential for in-combination effects from new development areas in Roche and the delivery of the A30-St Austell link road cannot be discounted in the longer term. Whilst these effects will be considered in depth through the forthcoming Environmental Impact Assessment process to be undertaken for the road scheme, careful management of new development (including in association with the additional potential allocation at Site D through **Policy B2**) will need to take place in conjunction with the proposed delivery of the scheme to limit impacts on biodiversity and secure enhancements.
2. Whilst the RNP supports sustainable transport use, there is additional potential for the RNP to further support the delivery of enhanced cycle links and networks in the parish. This includes between Roche and Victoria in association with the proposed pedestrian enhancements along Victoria Road.

Both these recommendations were accommodated in the final drafting revisions of the updated final Neighbourhood Plan after the Reg 14 consultation was completed. Otherwise the steering group noted and welcomed the very positive environmental assessment.

COMMUNITY UPDATE – AUGUST 2015

Given the substantive period necessary to consider all the evidence base and community consultation responses, consult further with landowners, get Cornwall Council and QC advice on likely policy content and next steps and carry out the SEA screening, prepare the outline of likely policies, and agree Locality support to engage AECOM to complete the SA/SEA process, a considerable period of work ensued between the May consultation leaflet and being able to present a draft Neighbourhood Plan to the community.

During this period which stretched in all from May to December 2015, the website was being kept updated, and twitter and Facebook feeds used to let people know how much work was ongoing (including further detailed discussion with Cornwall Council regarding the work on traffic route options, a County Highways process now running parallel to the Neighbourhood Plan process).

As time progressed however we received increasing queries about progress on the Neighbourhood Plan, and what was happening at Cornwall Council regarding road options. The Steering Group concluded at the end of July that we needed to produce a further household leaflet to update the community on progress, especially the County work on road options, and set out the anticipated timelines for the Neighbourhood Plan. A leaflet was therefore posted out door to door via royal mail at the beginning of August 2015 explaining the progress on the Neighbourhood Plan and

Cornwall Council's road options studies, and setting out the likely timescale for the Neighbourhood Plan. (Appendix 32)

THE DRAFT NEIGHBOURHOOD PLAN

Throughout the time AECOM was working on the SEA, the Neighbourhood Steering group engaged with Paul Tucker QC and Cornwall Council on developing a full draft of Neighbourhood Plan and accompanying Design Guide, subject to the AECOM work. We also engaged with Cornwall Wildlife Trust to gain additional input on the environmental issues (the Parish having significant environmental designations, but also reflecting community concerns to protect and enhance the local environment as far as possible).

This substantive drafting work was completed in parallel with the AECOM SEA work, and they were kept informed throughout.

As a result, we had completed and designed the full Draft Neighbourhood Plan by the beginning of December 2015, agreed by the Steering Group and incorporating all the advice of our QC Paul Tucker, Cornwall Council Neighbourhood Plan team members, Cornwall Wildlife Trust, and most importantly taking into full account the views of all interested parties consulted including landowners and the community as a whole. This was supported by the AECOM SEA report issued 12th December.

The Steering Group therefore then published the Draft Roche Parish Neighbourhood Plan (Appendix 33), and made arrangements for the formal Regulation 14 consultation, comprising both community consultation and formal statutory consultee contacts (and further interested parties as recommended by Cornwall Council).

REGULATION 14 CONSULTATION: DECEMBER 2015 TO JANUARY 2016 – THE COMMUNITY ENGAGEMENT

The Steering Group prepared an 8 page full colour tabloid newspaper (Appendix 34) for door to door circulation in the first week of December 2015 announcing the Neighbourhood Plan draft was published, summarizing the key Neighbourhood Plan policies, advertising the full draft Neighbourhood Plan (and Design Guide) as available at the Roche Neighbourhood Plan website, and setting out a questions for the final Reg 14 survey.

The tabloid also advertised the Public Consultation event which would take place through the afternoon of Sunday December 13th at Roche Victory Hall. This consultation event formally launched the Regulation 14 Consultation, which would run to the 31st of January.

The Website was also thoroughly updated (Appendix 35) to include a downloadable version of both the full Draft Neighbourhood Plan and the Design Guide, advertise the new Public Consultation event, and make available much of the evidence base, with a link to 'have your say'.

The tabloid summary and survey was also hand delivered to all the local business premises, together with a letter (Appendix 36) addressed to the owner/managing director again advertising the public consultation event on the 13th December, and encouraging comments/responses. The letter was sent from Cornwall Councillor John Wood on behalf of the steering group.

The publication of the Draft Neighbourhood Plan, the consultation event and the survey were also actively promoted via our Facebook and Twitter accounts.

As with the previous consultation event, members of the Steering Group were available throughout the consultation event on the 13th December to talk to members of the public about the plan, explaining our reasoning, answering questions, and listening to suggestions. Full colour printed copies of the draft Neighbourhood Plan were available to anyone wanting one, together with extra copies of the 8 page tabloid summary/survey, with assistance given to anyone wanting help or having questions about the survey. In addition, a new set of pop up display panels (Appendix 37) were produced displaying key policy proposals, large scale maps of the Parish, and a ready supply of free refreshments. Over 200 people came to the event during the afternoon, taking the opportunity to quiz the Steering Group members, fill out survey forms, study the full Neighbourhood Plan documents – and enjoy the free tea and mince pies provided.

In light of the Christmas and New Year period, a second full colour A3 leaflet (Appendix 38) was then circulated in mid-January door to door, emphasising the key issues around development pressures and traffic, and repeating the survey questions – stressing the importance of responding by 31st January.

The substantial community engagement effort delivered an outstanding public response. In all 365 survey reforms were returned, a response rate of around a quarter of all households in the Parish

Question 1: Do you agree with protecting the green gap between Roche and Victoria from development, along with the Glebe Field, duck pond, Old Fairground field and recreation areas?

Yes: 356 (98%) No: 2 (1%) Not sure: 6 (2%) Total responses: 364 (1 response spoilt by Y/N answer split)

Question 2: Do you agree with limiting housing development to sites A, B and C – small sites well connected to the village, with high quality design and self-build opportunities?

Yes: 339 (95%) No: 11 (3%) Not sure: 8 (2%) Total responses: 358 (7 chose not to answer)

Question 3: Do you agree more housing between Harmony Road and Edgcumbe Road is acceptable only if that funds a new road (contracted before any new homes) to get heavy traffic out of Roche and Trezaise, and improvement is made to the quality of the central square?

Yes: 335 (92%) No: 21 (6%) Not sure: 9 (2%) Total responses: 365

Question 4: Do you agree that development outside these areas should normally be limited to small brown field sites that are natural infill, protecting the countryside?

Yes: 343 (95%) No: 6 (2%) Not sure: 11 (3%) Total responses: 361 (1 chose not to answer)

Question 5: Do you agree all development should be high quality and designed to fit in with the best of the village and its neighbours, using a local design guide to guarantee high standards?

Yes: 354 (97%) No: 4 (1%) Not sure: 6 (2%) Total responses: 364 (1 chose not to answer)

Question 6: Do you agree business growth should be concentrated at Victoria, expanding if necessary the existing business park?

Yes: 350 (96%) No: 2 (1%) Not sure: 12 (3%) Total responses: 364 (1 chose not to answer)

The Neighbourhood Plan Steering Group considered this response a very strong endorsement of the Draft Neighbourhood Plan, covering as they did the policies most likely to arouse any concern from the community.

REGULATION 14 CONSULTATION: DECEMBER 2015 TO JANUARY 2016 – THE FORMAL CONSULTEES

On December 13th all the statutory and other formal consultees recommended by Cornwall Council were contacted either by e-mail, or where e-mails were not available the same material was sent by first class Royal Mail. A covering letter explained that this was the Regulation 14 consultation for the Roche Neighbourhood Plan, with a deadline for responses of the 31st January 2016.

The e-mails/letters included a copy of the Draft Roche Neighbourhood Plan, the Draft Roche Design Guide, and the SEA report prepared by AECOM.

The consultees and responses are listed below. The formal replies are also attached in [Appendix 39](#), plus [Appendix 40](#) which is the final confirmation that we had addressed Natural England's previous concerns in the full final submission draft of the Neighbourhood Plan.

Homes and Communities Agency	No comments received.
Natural England	<p>Comments: Natural England commended the quality of the plan, but raised a number of points in their first response (2nd February 2016), notably that an HRA screening should be carried out re policies B1, B2 and C1 in particular; to remove the specific route suggestion for a new link road or carry out a full SEA; to review Policy E1 to ensure it aligned with latest Ministerial Statement; an offer to help extend policy G1 to add policy regarding protecting and enhancing the natural environment and address some wording concerns; some queries regarding the SEA wording; some suggested improvement of the design guide.</p> <p>An HRA by AECOM was funded by the Parish Council in response, and in due course and after consultation with our QC and Cornwall Council and based on the HRA wording revisions proposed to address all the concerns (with Natural England helping reword policy G1 as new policies G1 and G2). The indicative route map for the new road was deleted.</p> <p>A meeting was held with Natural England to discuss these proposed amendments, the draft HRA, and whether or not a full SEA was still required given the policy support for a new link road/bypass west of Roche. A formal opinion was requested by NE to be provided by our QC plus an opinion and precedents by Cornwall Council, together with advice from Natural England head office. All these in due course agreed that since the plan can support a road scheme in principle but not decide on the route of any new road, the need for an SEA lay with Cornwall Highways as and when a route was agreed by them and a proposal brought forward. To make this clear, policies B1, B2 were amended to reference this need, together with a similar addition to Policy C1 requested by Natural England. The HRA was also updated to address NE concerns regarding a possible SAC impact from policy C1 which had not been addressed in the first draft.</p>

	<p>The changes were agreed by Natural England by e-mail on 17 February. Given other drafting amendments from Cornwall Council and our QC (adopted by the steering group) shortly afterwards, the full proposed final draft was again put to Natural England on the 20th April. The formal reply confirming all the revisions were welcomed, with no remaining substantive concerns, was received on the 4th May, - two minor additional textual suggestions were proposed. As the submission plan was by this stage printed and signed off by the Parish Council for submission to Cornwall Council, the Steering Group asks the Examiner to consider these further suggestions from NE; the Steering Group are happy to accept them if the Examiner feels this would be helpful.</p>
Environment Agency	<p>Comments: “The Village of Roche is situated close to the headwaters of the Fal, Camel and Par Rivers. It is also located close to 3 areas of significant natural habit including the Goss Moor National Nature Reserve. It is paramount that the neighbourhood plan highlights the strategic location of Roche within the natural landscape and outlines the opportunities for sustainable development.</p> <p>Distributed green infrastructure should be a consistent theme throughout the plan with a clear objective to create linkages between the surrounding natural habitats. Creating ‘green corridors’ that extend through the village will provide a broad range of benefits that include greater biodiversity and surface water management at the very top of the catchment. This is particularly relevant to the Par River and the work of the St Austell Resilient Regeneration Project.</p> <p>If designed well, green infrastructure can be used to create attractive spaces; with clear links to improved community health and wellbeing. The neighbourhood plan should ensure development sites around Roche adopt the concept of multifunctional green spaces to limit the environmental and social impacts created by overdevelopment. Some of the elements to be considered should include surface water features (e.g. wetlands), planting of vegetation that is consistent with the local habitat, access routes that (foot/bike) link to the nature reserves and national trails beyond, outdoor gyms and creative play areas.</p> <p>The plan should also highlight the opportunity to support distributed green infrastructure and multifunctional open spaces in the village centre.</p> <p>The plan must aim to seek opportunities to reduce downstream flood risk by intercepting and storing surface, highway and river water using land management techniques, taking account of downstream flood risks in St. Blazey, Luxulyan, and Par. This approach should integrate with the St. Austell Resilient Regeneration European and UK government funded project.”</p> <p>Whilst noting their comments did not raise any formal concerns, the EA comments were considered in detail by the steering group, our QC and Cornwall Council, and wording changes incorporated in the final Neighbourhood Plan.</p>

Historic England	<p>Comments: “we have no significant comments to make on the draft Plan. Neighbourhood communities in Cornwall have the advantage of a resourced neighbourhood planning team at Cornwall Council to advise on relevant issues during the Plan preparation process and this includes access to a dedicated heritage adviser. Our arrangement with the Council is therefore that they will provide necessary input to Plans on heritage matters, only bringing them to our attention when of greater than local significance – a scenario which has not occurred in this instance.</p> <p>It therefore only remains for us to offer our congratulations to the Roche community on the preparation of its Plan. We are particularly impressed by the extent to which the community places value on the area’s historic character and uses this to inform the Plan’s suite of policies and proposals. Much commendation is due the Design Guide which draws upon a detailed and robust understanding of the area to inform and promote specific design objectives intended to reinforce local distinctiveness.”</p> <p>The steering group in fact received substantial input from the Council on heritage matters, including the author of the Roche CISI report that substantially informed the heritage sections and design guide. The very supportive comments of Historic England reassure the Steering group of the quality of our approach to these issues.</p>
Network Rail	<p>Comments: “Having now read the documents the only comment I would make is that Network Rail from a safety perspective would be concerned if policies in the plan resulted in a material increase the use of level/pedestrian crossings. For instance the proposal in Policy C1 to significantly increase the employment land at Victoria, which lies to the north of Roche Station, may have such an impact. Further information on the impact of development on level/pedestrian crossings is set out below. Network Rail would be grateful if the following information could be taken into account in the preparation of this Neighbourhood Plan:</p> <p><i>Network Rail is a statutory undertaker responsible for maintaining and operating the country’s railway infrastructure and associated estate. Network Rail owns, operates, maintains and develops the main rail network. This includes the railway tracks, stations, signalling systems, bridges, tunnels, level crossings and viaducts. The preparation of development plan policy is important in relation to the protection and enhancement of Network Rail’s infrastructure, any proposed changes require careful assessment to ensure they are both safe and viable.</i></p> <p><i>Network Rail is required to monitor new policies and development allocations that may have an impact on rail services and/or safety of existing infrastructure. For instance the safety of level crossings is a major concern which can be impacted in a variety of ways by planning proposals. This issue is dealt with in more detail below.</i></p> <p><u><i>Level/Pedestrian Crossing Safety</i></u></p> <p><i>Development proposals’ affecting the safety of level/pedestrian crossings is an extremely important consideration for emerging planning policy and related development allocations to address. The impact from future development can result in a significant increase in the vehicular and/or pedestrian traffic utilising a crossing which in turn impacts upon safety and</i></p>

	<p>service provision.</p> <p>As a result of increased patronage, Network Rail could be forced to reduce train line speed in direct correlation to the increase in vehicular and pedestrian traffic using a crossing. This would have severe consequences for the timetabling of trains and would also effectively frustrate any future train service improvements. This would be in direct conflict with strategic and government aims of improving rail services. Therefore the location of proposed new development is an important consideration for Network Rail and should form part of any initial appraisal of future development sites.</p> <p>Please note that Cornwall Council have a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway:</p> <ul style="list-style-type: none"> ○ Schedule 4 (j) of the Town & Country Planning (Development Management Procedure) Order 2015 requires that... "Where any proposed development is likely to result in a material increase in volume or a material change in the character of traffic using a level crossing over a railway (public footpath, public or private road) the Local Planning Authority prior to granting approval must consult: The operator of the network which includes or consists of the railway in question and the Secretary of State for Transport". <p>Any planning application which may increase the level of pedestrian and/or vehicular usage at a level crossing should be supported by a full Transport Assessment assessing such impact: and the developer is required to fund any required qualitative improvements to the level crossing as a direct result of the development proposed."</p> <p>The steering group noted that the detail comments were a generic position in relation to level/pedestrian crossing safety, there being a pedestrian crossing at Roche Station. Given the very small number of services, slow speeds, and small likely impact on passenger numbers using the crossing of development arising from Policy C1, it was not felt that a policy change was needed. Advice was sought from our QC and Cornwall Council who supported this view, noting that were an extension to the business park brought forward the issue would in any event be considered at that stage.</p>
Highways England	<p>Comments: "Whilst we have no specific comments on the plan's policies, Highways England will wish to be involved in the development of Cornwall Council's options for the proposed link road, and any development proposals coming forward at Victoria will also need to be supported by a transport assessment in line with prevailing policy to ensure the impact of development on the A30 junction is also fully considered."</p> <p>The steering group sought advice from Cornwall Council and our QC on these comments, who confirmed that no wording changes were needed as Highways England would indeed be involved if specific proposals are brought forward.</p>
Marine Management Organization	No comments received.
Cornwall AONB unit	No comments received.
CPRE Cornwall	No comments received.
Royal Cornwall Hospital Trust	No comments received.

Peninsula Community Health	No comments received.
Health Watch Cornwall	No comments received.
Western Power Distribution	No comments received.
British Gas	No comments received.
EDF Energy	No comments received.
South West Water	<p>Comments: “Having reviewed the levels of development suggested in the plan this does not cause any immediate concern in terms of our ability to accommodate such within our infrastructure”.</p> <p>The steering group welcome SWW confirmation that the Plan caused them no capacity concerns.</p>
Forestry Commission	No comments received.
National Trust	No comments received.
Duchy of Cornwall	No comments received.
Cornwall Wildlife Trust	No comments received. The steering group note that Cornwall Wildlife Trust were however closely involved in the drafting of relevant sections of the Neighbourhood Plan, and are grateful for their support with this.
Devon & Cornwall Housing Association	No comments received.
Coastline Housing	No comments received.
Westcountry Housing Association	No comments received.
First Group Cornwall (bus services)	No comments received.
First Great Western	No comments received.
NFU (SW)	No comments received.
Civil Aviation Authority	No comments received.
Cornwall Chamber of Commerce and Industry	No comments received.
Community Energy Plus	No comments received.
Kaolin and Ball China Clay Association	No comments received.
Imerys	Comments: Imerys commented supportively on the Neighbourhood Plan, especially the need for a new link road. They made the point that were an

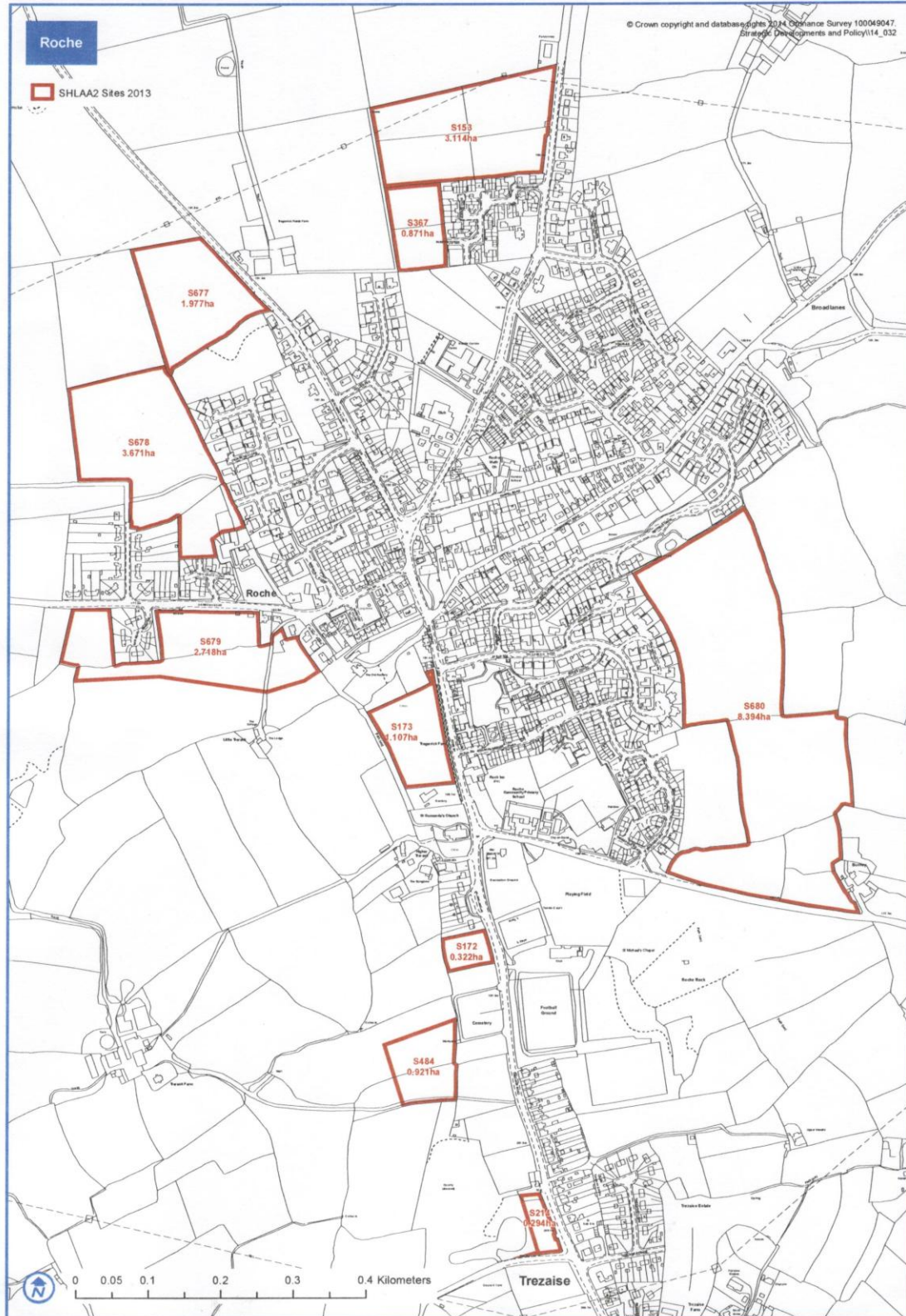
	<p>HGV diversion put in place, were that route closed there would need to be provision for diversion through Roche.</p> <p>The steering group agree that were an HGV diversion put in place, then if that route closed their would need to be provision for diversion through Roche, but noted this would have to be addressed by Cornwall Highways if a scheme is brought forward. The further comments regarding policy E1 echoed the point made by NE regarding alignment with national policy, and a suitable rewording proposed by our QC and agreed with Cornwall Council and NE has been agreed by the steering group and incorporated in the final Neighbourhood Plan.</p>
Cornwall Local Enterprise Partnership	No comments received.
St.Wenn Parish Council	No comments received.
St.Columb Major Parish Council	No comments received.
Withiel Parish Council	No comments received.
Lanivet Parish Council	No comments received.
Luxulyan Parish Council	<p>Comments:” Luxulyan Parish Council reviewed the Draft Roche Neighbourhood Plan with accompanying documents and has no comment to make other than express its congratulations. An impressive amount of work has gone into the documents and Luxulyan Parish Council wishes you every success in its adoption. Luxulyan is now beginning the work on a Neighbourhood Plan and may ask for some pointers.”</p> <p>The steering group welcome the support of Luxulyan Parish Council, and have offered to assist that Parish with their plan</p>
Treverbyn Parish Council	No comments received.
St.Stephen-in-Brannel Parish Council	<p>Comments: Members felt these documents were extremely comprehensive and should serve the Parish of Roche well in future years. Council would like to wish the steering group good luck with the final submission.</p> <p>The steering group welcome the support of St. Stephen-in-Brannel Parish Council</p>
St. Dennis Parish Council	No comments received.
Wales & West Utilities Ltd	No comments received.
Cornwall Buildings Preservation Trust	No comments received.
Steve Double MP	No comments received.

REGULATION 14 CONSULTATION: DECEMBER 2015 TO JANUARY 2016 – THE SHLAA SITE LAND OWNERS

Given the fact that a large number of sites in Roche Parish had been brought forward to Cornwall Council's SHLAA (and a site at Trezaise also proposed by Cornwall Council for affordable housing), the Neighbourhood Plan Steering Group throughout the process of drawing up the Neighbourhood Plan paid particular attention to appraising these sites, consulting with the community about them – and giving the landowners/promoters every opportunity to make their case.

In the draft Neighbourhood Plan the Policies proposed reflected the preferences of the community, the environmental assessment by AECOM, and the evidence base. However (except for sites already withdrawn by the promoters), at the start of the Reg 14 consultation each of these landowners or their agents were sent a copy of the Draft Neighbourhood Plan, and given a further opportunity to make representations. All representations received were duly considered by the Steering Group, and our QC and Cornwall Council advisors.

A map of the SHLAA sites is shown overleaf. The Cornwall Council proposal was for the two fields immediately north of the SHLAA site Ref S214.



The table below sets out a summary of this process and outcomes (the detailed written representations are in [Appendix 42](#)).

<p>SHLAA Ref 172 Glebe land off Trezaise/beside cemetery, in ownership of Glebe: NP allocates as Site A (Policy A1)</p>	<p>The Draft Policy A1 allocating this site proposes it for self-build. The Glebe made representations urging flexibility depending on viability of and demand for self-build. The Steering Group accepted the need to introduce flexibility depending on viability and demand. Cornwall Council made representations that the policy should clarify need to meet requirement of their affordable housing policy. Final Policy A1 amended to introduce such flexibility around viability and demand, and to reflect Cornwall affordable housing policies.</p>
<p>SHLAA Ref S214 Land fronting Trezaise – frontage to old quarry, owned by Mr Keogh. NP does not support development at this site, which is outside the proposed Trezaise development boundary (policy A2).</p>	<p>The Draft Policy A2 does not support development at Trezaise on grounds of its detachment from the facilities in Roche village, and the severity of traffic issues. The owner of site S214 was originally consulted and made the case for housing development here. The Public consultations showed very low support for development here, and the site was appraised as poorly connected for pedestrians in particular to local services and was impacted by the very poor traffic situation through Trezaise. However the draft plan policy commentary makes clear that plan policy regarding Trezaise should be reviewed if a bypass is achieved. The owner’s agent made representations at the Reg 14 stage re-arguing for allocation of the site, including the argument that it is a brown field site.</p> <p>The Steering Group sought advice from Cornwall Council who noted:</p> <ol style="list-style-type: none"> 1. Nothing in the RPNP would remove any existing planning permissions 2. The site is existing employment land so under policy 5 in the emerging LP would be safeguarded for employment use so long as the employment use remains viable. 3. There is a green gap between Roche and Trezaise, even if some of that gap is not open countryside (football club) and the development boundary around Trezaise seems justified. 4. There is a possibility that the quarry site could be developed as an exception site (if there was a demonstrable local need for more housing), alternatively, A2 specifically says that if the link road or diversion are built then the restrictions along Trezaise road can be

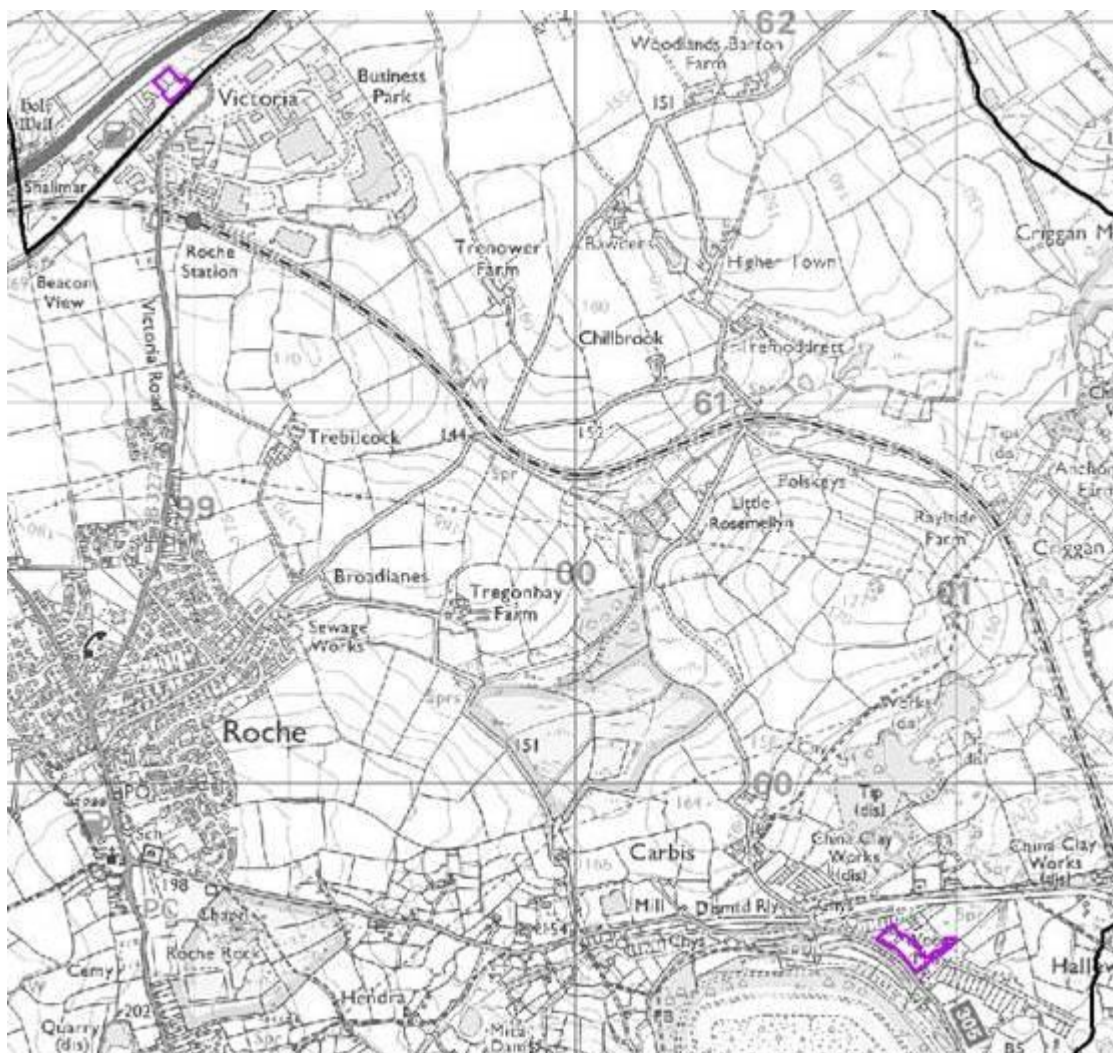
	<p>revisited.</p> <ol style="list-style-type: none"> 5. The council are not aware of any requirement to further increase the housing numbers in the emerging Cornwall Local Plan further as a result of government policy; the Plan returns to inspection next month when the Inspector will begin to determine whether the plan is sound. 6. The RPNP has allocated sufficient land to meet anticipated growth (based on numbers in the emerging LP) and has a policy for additional housing on site D; there is also provision for the development of exception sites to meet any additional local demand in future. 7. The site selection process has been robust, with community consultation at each stage and the reasons for rejection of this site seem justified (also backed up by the advice given in the Pre-app in 2013). <p>The steering group also checked the existing planning permissions on the site; it has permission for waste disposal and ancillary operations. This permission has a restoration condition to ensure that the site is restored once those operations are complete (this would leave it in a greenfield state). A pre-app enquiry in 2013 (for part of the site, or the site immediately adjacent and fronting the road which is the area proposed to the SHLAA discussed here) got a response that affordable led housing on the site would be unlikely to get support (better related sites were available to meet the need for AH elsewhere in the parish).</p>
<p>SHLAA Ref S367 Land off Farrow Ford</p> <p>SHLAA Ref S679 Land south of Harmony Road</p> <p>SHLAA Ref S153 Victoria Road</p> <p>SHLAA Ref S680 Land E St.Michael's Way</p> <p>SHLAA Ref S677 Land W Edgcumbe road</p> <p>SHLAA Ref S678 Land W Thornton Close/North of Harmony Road</p> <p>All sites in ownership of Tregothnan Estate. NP does not support development at 367, 679, 153, and 680, which are outside the proposed Roche development</p>	<p>All these sites around Roche Village were proposed by the Tregothnan Estate to the SHLAA. Members of the Steering Group met Tregothnan Estate in Spring 2015 and discussed the emerging ideas for a route west of Roche and the possible contingent allocation of Site D (incorporating most of, and extending beyond) their two SHLAA sites 677 and 678, linked to achieving a bypass or HGV diversion. These two sites also ranked relatively well in the environmental appraisal and community consultation. The other sites (367, 679, 153, and 680) ranked less well in the Environmental appraisal and the community consultations than the alternative sites allocated in the Neighbourhood Plan (sites A, B, C and D). Tregothnan Estate indicated they were not anticipating all their sites to be brought</p>

<p>boundary (Policy A1). Proposed Site D (Policy B2) incorporates most of sites 677 and 678.</p>	<p>forward but wished them to be considered, would be pleased if they could facilitate a road solution, and wished to be engaged. They did not respond to the Reg 14 consultation invitation to comment further, but the Steering Group are aware they are engaged with Cornwall Council on the emerging bypass proposals currently under consultation.</p>
<p>SHLAA Ref S484 Land at Trezaise. NP does not support development at this site, which is outside the proposed Trezaise development boundary (policy A2).</p>	<p>Originally proposed for housing to the SHLAA. Members of the Steering Group discussed this site with the owner several times, and at one stage understood an application was to be submitted in late summer 2015. However in light of the outcome of the Neighbourhood Plan consultations and the emerging policies, the site owner informed the NP Steering Group prior to Reg 14 consultation he did not wish to pursue it at this time. However he stated he may wish to pursue it if bypass built, in line with the supporting text to Policy A2 which states that policy should be reviewed if Roche bypass built (policy A2 justification), as this may then allow opportunities to improve sustainability of Trezaise through development. Policy A2 reflects both the community consultation outcomes and the environmental appraisal.</p>
<p>SHLAA Ref S173 Glebe field, in ownership of Glebe. NP proposes this site as a local green space designation (Policy D1), and it is outside the proposed Roche development boundary (Policy A1).</p> <div data-bbox="186 1276 750 1596" data-label="Image"> </div> <p>Church fete/picnic in the Glebe field</p>	<p>At the time that the Neighbourhood Plan process started, the Glebe was drawing up proposals for development of this site. However, this evoked substantial opposition. The NP Steering Group and the Parish received a petition from 260 residents against.</p> <p>The site has a long and continuing history of community use (church fetes, gymkhanas, practice facilities for the Roche Tug of War team, etc.). It is also part of a Georgian planned landscape between the Grade 2* listed Church and the Grade 2 listed Old Rectory. It also contains a Grade 2 listed Celtic Cross on its original plinth and in its original setting.</p> <p>The Cornwall Industrial Settlement Initiative report in 2006 (commissioned by English Heritage and the then Cornwall County and Restormel Borough Councils, and forming part of Cornwall Council's evidence base) recommended protection for this planned landscape as one of local and regional and possibly national importance.</p> <p>It was also the least favoured of all the SHLAA sites in the community consultations, and its development was not supported by the Environmental appraisal. In light</p>

	<p>of the evidence against development and the representations by the community (and the Georgian Society, Cornwall Archeological Society, and others), the Glebe let the steering group know in summer 2015 it would no longer pursue allocation for residential development of this site.</p> <p>At that time and again in their Reg 14 response they however made representations against its designation as a local green space, on the grounds that although it has been used on occasion for community associated use, it is private agricultural land and designation would unnecessarily limit its future use.</p> <p>However, given the evidence above, its separation from any other agricultural land, the very strong community support for the designation (over 98%), a history of community use, and the strong recommendation of the CISI report that the site should be protected, the Steering Group strongly concluded its designation as a local green space (policy D1) should be maintained.</p>
County Council affordable housing site (the two fields south of S214	<p>Originally proposed for affordable housing by Cornwall Council, the Steering Group discussed this site with Cornwall Council officers in light of the very low ranking of the site in the early sustainability appraisal work and the community consultations, and the severe concerns about traffic safety through Trezaise and poor connectivity to services in Roche village. Evidence from Ocean housing of low demand for affordable housing in Roche, with needs being met by existing provision, was also presented. As a result the steering group were informed in summer 2015 the Council would no longer pursue allocation for residential development of this site. They made no representations for the allocation of the site in the Reg 14 consultation.</p>

ADDITIONAL SHLAA SITE LAND OWNERS

Cornwall Council updated their SHLAA in 2015, during the NP process, and informed the Neighbourhood Plan steering group that two further sites had come forward that the Neighbourhood Plan steering Group might wish to consider. U0035 (Keveths, The Old Coal Yard PL26 8PP – the site to the South in the map below) is within Roche Parish. U0032 (Bamber House, Victoria PL28 8JX) abuts Roche Parish, on the northern edge of Victoria.



These landowners were also met (in summer 2015), and the emerging Neighbourhood Plan policies explained.

In relation to U0035, the site is currently in mixed commercial use, reflecting its origins as a coal yard. As a brownfield site wider national or Cornwall policies would apply, but disconnected from any residential settlement (it relates most closely to Bugle) it was explained that the Steering Group was of the view that it was not suitable for allocation for residential use in the Neighbourhood Plan. The owner indicated they would not pursue allocation for residential development of this site at this time. They did not respond to the Reg 14 consultation.

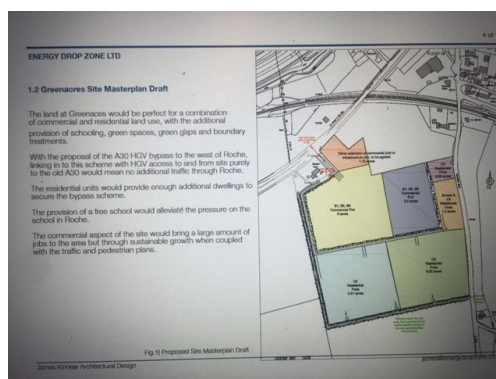
In regard to U0032, Although not in the Neighbourhood Plan area it is right on the border, so the landowner was met. The site comprises outdated and currently largely unoccupied business premises. Our approach to Victoria was explained, Policy C2 a) being that ‘change of use from an existing business use to residential use will only be supported if it is clearly demonstrated that there is no reasonable prospect of the existing business use being taken up in the foreseeable future, or alternatively that some residential is required to support a primarily business use’ – but that as it was outside the Neighbourhood Plan area we recommended the owner discuss options with Cornwall Council.

ADDITIONAL SITES BROUGHT TO THE ATTENTION OF THE STEERING GROUP

In addition to the sites identified in the SHLAAs above, and the Cornwall Council site, two further approaches about significant development emerged during 2015, both in the proposed ‘green gap’ between the settlements of Roche and Victoria.

1. ‘Greenacres’, proposed by Energy Drop Zone. This proposal was brought to the Parish Council in late 2015, who brought it to the attention of the Neighbourhood Plan steering group. A meeting was held between the Chair of the Steering Group and the promoters, and the now highly advanced draft Neighbourhood Plan proposals outlined to them, including the proposed protected green gap between the distinct communities of Victoria and Roche Village. This green gap reflected consultation responses that these distinct communities should be kept clearly separated, that Victoria should not grow south of the natural boundary formed by the rail line, and the identification of more appropriate sites for residential development supported by the community and the environmental appraisal much better linked to the principle facilities in Roche.

The views of Cornwall Council were also sought. They indicated a pre-application inquiry had been received for this site (in fact including the second site below) earlier in 2015. The pre-application enquiry response had been issued by Cornwall Council in September 2015 and formed the most up to date position from Cornwall Council. This advice suggested that the site would be unlikely to gain planning consent for residential housing.



The steering group discussed the Greenacres proposal again following that meeting as the promoters wished to pursue their proposal, and took views from the Parish Council. The strong view was this proposal constitutes inappropriate development, extending Victoria south of the railway line which currently forms that settlement’s southern boundary, and was not supported by the environmental appraisal nor the community consultations. Other proposed allocations more than meet the housing needs of the Parish, and are better located. The site also sits in the ‘green gap’ proposed between the two settlements (Policy F5) which was supported in the final consultation by 98% of respondents.

Further Reg 14 representations were made promoting the site for allocation by the Neighbourhood plan. However, after considering the representations carefully the steering group concluded the above reasons for not allocating this site all remained valid, and maintained its support for Policy F5. The southern boundary of the green gap proposal was however amended to better reflect the visual edge of Roche development, on the recommendation of our QC and Cornwall Council, to ensure the designated green gap accurately reflects the extent of the landscape and visual separation so as to properly perform its purpose.

2. A second site owner separately approached the Steering group to discuss a proposal for the field immediately north of Greenacres. The pre-application inquiry referred to above also covered this site (it appears at that time all the land in question was in single ownership, but the two sites were now being separately promoted and in separate ownership).



As with Greenacres, a meeting was held between the Chair of the Steering Group and the promoters, and the now highly advanced draft Neighbourhood Plan proposals outlined to them, including the proposed protected green gap between the distinct communities of Victoria and Roche Village. Again it was explained that the proposed green gap reflected consultation responses that these distinct communities should be kept clearly separated, that Victoria should not grow south of the natural boundary formed by the rail line, and the identification of more appropriate sites for residential development supported by the community and the environmental appraisal much better linked to the principle facilities in Roche. In this case the owner's agent informed the steering group that in light of the Neighbourhood Plan draft proposals they would not be pursuing the site for residential development, and no Reg 14 representations were made.

HRA REPORT

As detailed above, Natural England argued that an HRA was necessary given the potential impacts of some policies on the SACs. AECOM were commissioned to carry out this work, and this plus drafting changes met all of Natural England's concerns.

The conclusions of the HRA (Appendix 41) were:

Following screening of the above policies, the following recommendations have been made to ensure that likely significant effects do not arise as a result of the Roche Neighbourhood Plan either alone or in combination with other projects or plans.

Recommendations relating to policy B1

This section is divided into two parts. The first sets out those measures that are within the remit of the Neighbourhood Plan and would be appropriate for inclusion in policy. The second discusses further controls that are more applicable to later stages of link road development.

Measures within the direct control of the Neighbourhood Plan

Although the text of policy B1 is clear that it is only *expressing support* for the link road, and moreover is only expressing support for the *principle* of the link road (rather than any specific detailed route), the policy also refers directly to figure 2.3 which does depict a specific route, albeit one marked 'indicative only'. It is recommended that the

policy either removes explicit reference to figure 2.3 (since reference to figure 2.3 is not necessary for the policy to be effective) or makes it clear that figure 2.3 is only included as an informative example of how the route may look.

In addition, policy B1 states that *'support for this route is subject to the following conditions ...'* it is recommended that for absolute clarity (given the depiction in figure 2.3 of a route which could potentially result in likely significant effects on Breney common and Goss & Tregoss moors sac) the following text is included as a condition: *'that the scheme will not result in an adverse effect on the integrity of any internationally important wildlife sites, either alone or in combination with other plans and projects'*.

Measures beyond the direct control of the Neighbourhood Plan

At this stage, the actual route of the link road is not determined and alternatives are still being investigated. In the process of further developing the scheme and a final alignment there will be many factors to take into consideration and this is primarily a matter for the highways authority.

As an initial step, opportunities to keep new sections of link road more than 200m from any European sites should be investigated by the local highways authority. Where that is not possible (and for all stretches that are existing highway within 200m of the sac) it will be necessary for the scheme developers to follow department for transport and environment agency/ Natural England guidance in investigating transport flows and air quality impacts. This involves air quality assessment to determine whether the scheme would result in an increase in NOx concentrations or nitrogen deposition rates on all European sites within 200m, and demonstration that:

- It will not lead to an increase equivalent to more than 1% of the critical load/level¹ for the most sensitive habitat; or
- The combined background and additional deposition/concentrations will not exceed 70% of the critical load/level for the most sensitive habitat; or
- The increase in deposition will exceed these thresholds but will not result in an adverse effect on the habitats in question.

The final scheme should fully investigate potential for impacts via surface runoff and salt spray associated with new section(s) of road and the final alignment for new (or widened/realigned) sections of road should be chosen accordingly.

The final scheme should not result in any proposals for landtake from the sac as such proposals are unlikely to be legally justifiable on the grounds of both 'no alternatives' and 'imperative reasons of over-riding public interest'².

It is understood that these processes should be undertaken by the scheme developers and highways authority rather than by Roche parish council and that they fall outside the direct remit of neighbourhood planning.

Recommendations relating to policy B2

To ensure robustness, it is recommended that amendments are made to policy G1 (protection of wildlife). These are detailed later in this section. It is also suggested that policy B2 references the conditions set out in policy B1 and specifically the recommended addition to those criteria: *'that the scheme will not result in an adverse effect on the integrity of any internationally important wildlife sites, either alone or in combination with other plans and projects'*.

Recommendations relating to policy C1

Policy C1 states that support would be *'subject to the following conditions ...'* it is recommended that for absolute clarity the following text is included as a criterion: *'that the scheme will not result in an adverse effect on the integrity of any internationally important wildlife sites, either alone or in combination with other plans and projects'*.

Recommendations relating to policy G1 (protection of wildlife)

Policy G1 (protection of wildlife) is the policy within the Neighbourhood Plan which provides protection for wildlife and could also provide full protection for European designated sites, thus ensuring that no likely significant effects result

¹ The critical load or level being the threshold below which there is a very high degree of confidence that no effect would arise

² These are the two legal tests which must be met where a proposal will result in an adverse effect on an internationally important wildlife site that cannot be avoided or adequately mitigated to remove the effect.

To ensure that no likely significant effects occur as a result of policies within the Neighbourhood Plan, it is recommended that amendments are made to Neighbourhood Plan policy G1: (protection of wildlife). At present the policy only provides protection for ‘wildlife of the parish’, providing no explicit protection for European designated sites. It is noted that policy 23a: (European protected sites) within the Cornwall’s emerging local plan provides explicit protection for European designated sites, and that this Neighbourhood Plan will be in compliance with this countywide local plan, however, as this parish does contain three European designated sites, for robustness it is recommended that the Roche Neighbourhood plan provides explicate protection for European designated sites to ensure that no likely significant effects ensue.

To ensure that the neighbourhood plan provides suitable protection against likely significant effects of European designated sites, both within and outside of the parish council boundary (i.e. In combination with other projects or plans), and in-line with Cornwall’s emerging local plan. In correspondence to the parish council³, Natural England suggested the following wording to be incorporated into policy G1: (protection for wildlife):

‘Sites of European importance

The highest level of protection will be given to sites of European importance within the parish (i.e. Potential, candidate and existing special protection areas, and possible, candidate and existing special areas of conservation and Ramsar sites). Proposals having an adverse impact on the integrity of such sites will not be permitted other than in exceptional circumstances. Measures to avoid any adverse impacts on these sites will be sought as a first principle.’

Further to this it is recommended that policy G1 (protection of wildlife), include the requirement for the provision of project specific HRA screening to accompany any planning application where required: *‘where risk of likely significant effects on internationally important wildlife sites exists, proposals will be supported when a habitat regulations assessment is undertaken to demonstrate that no likely significant effects will arise. Where likely significant effects cannot be screened out, appropriate assessment will be required and, if necessary, measures to avoid adverse effects on the integrity of those sites’.*

Overall conclusion

Provided the above recommendations are incorporated into the Neighbourhood Plan, it can be concluded that Roche’s Neighbourhood Plan will not result in a likely significant effect upon European designated sites, either because there is no impact pathway or because the plan would provide safeguards requiring further analysis at the project level and removing support from any detailed scheme that resulted in adverse effects on integrity that could not be adequately mitigated or avoided.

All the recommendations relating to the Neighbourhood Plan have been incorporated in the final policies and supporting text of the submitted Neighbourhood Plan.

NEIGHBOURHOOD PLAN FINALISED

In addition to the careful consideration of the Reg 14 consultation responses detailed above, the draft Neighbourhood Plan was considered in detail across the relevant departments of Cornwall Council, with our Cornwall Council liaison officer Colleen O’Sullivan ensuring all interested officers were appropriately consulted. A range of drafting suggestions and comments were made, but no substantive objections or concerns.

In response to all the Regulation 14 Consultation response as a whole, including all those from Cornwall Council officers, suitable drafting amendments were suggested by our Cornwall Council support officer Colleen O’Sullivan and our QC. All these were discussed in detail by the Steering Group. The final draft reflects the support of the steering group for all the material Cornwall Council input and our own expert advice, none of which significantly altered the intentions of the draft plan, but all of which helped improve the detail policies and supporting text, and ensured alignment with local and national policy.

Once this updated text and policies were finalized by the steering group, the revised Neighbourhood Plan was subject to an updated Environmental Appraisal by AECOM (Appendix 43). This confirmed the outcome had addressed the two minor issues raised in the previous Environmental Appraisal by AECOM, and fully supports the final proposed Neighbourhood Plan:

Conclusions at this current stage

Potential significant effects

7.9.1 The appraisal has concluded that the current version of the RNP is likely to lead to **significant positive effects** in terms of the ‘population and community’ SEA objectives. These benefits largely relate to the carefully targeted spatial approach proposed by the Submission version of the plan, the focus on improving the quality of life of residents in Roche, the impetus on promoting enhancements to the public realm and the RNP’s focus on protecting and enhancing green infrastructure and supporting enhancements to transport networks.

7.9.2 In terms of potential negative effects, there are likely to be some minor effects on landscape and townscape from new areas of development within and on the edge of Roche associated with the allocation of the three sites through the RNP. However, central to the Neighbourhood Plan is the protection and enhancement of the historic environment, the public realm and landscape / townscape character of the parish. When combined with the opportunities offered by the proposed bypass associated with the proposed A30-St Austell link road, this has the potential to lead to **significant positive effects** in Roche village in relation to the ‘historic environment and landscape’ SEA objectives.

7.9.3 In relation to potential effects on biodiversity, negative effects are likely to be limited by the policy approaches put forward through the RNP. Whilst the proposed sites for housing allocations are located in relative proximity to the internationally and nationally designated biodiversity sites present in the parish, any adverse effects on these sites are likely to be limited by the proposed size of the allocations. This is reflected by the allocations not being located within an Impact Risk Zone for the SSSIs for the type and scale of development being proposed.

7.9.4 Whilst the draft plan approach will help initiate a range of beneficial approaches in relation to ‘climate change’ theme (including in relation to mitigation and adaptation) and the ‘land, soil and water resources’ theme, these are not considered to be significant in the context of the SEA process.

Recommendations at this current stage

7.9.5 The two recommendations proposed in the Environmental Report accompanying the Regulation 14 consultation version of the Neighbourhood Plan (Section 6.3.2) have been responded to through the updated policies presented in the Submission version of the RNP. As such no further recommendations are made at this stage.

NEIGHBOURHOOD PLAN SUBMITTED

The final draft of the Roche Neighbourhood Plan was presented to the Parish Council at their meeting on the 20th April 2016, when it was resolved unanimously that the Roche Parish Council were in support of submitting the Neighbourhood Plan to Cornwall Council.