

Proper title of Angela Rayner
Housing Minister

Dear **Secretary of State**

Appeal Ref: APP/D0840/W/23/3331740 (PA23/04101) – Land South of Longshore Apartments, Dane Road, Newquay TR7 1EN

Following a meeting of Newquay Town Council, I have been instructed to write to you concerning the above planning matter and to complain in the strongest possible terms regarding the decision made by S Harrington, your appointed Planning Inspector, to allow this Appeal.

In coming to this decision, the Inspector has ignored the Town Council's response to the Appellant's assertion that a conflict exists between Policy G1(a) – Settlement Boundaries - as described in the Newquay Neighbourhood Development Plan (April 2019) (NNP) - and Policy 1 of the Cornwall Sites Allocations Development Plan Document (November 2019) (CSADPD). And in taking a position where the NNP and the CSADPD are considered to pull in opposite directions (rather than working in tandem as was intended), the Inspector has simply decided to declare the precedence of the most recently adopted document **whilst failing to take into account what the CSADPD itself declares to be the proper precedence between the policies of the two documents.**

For your assistance, we attach our comments to the Appeal and the first page of the Newquay section of the CSADPD, paragraphs 8.3 and 8.5 are particularly relevant.

Whilst Newquay Town Council supports many and most new housing development applications as we wish to see people of Cornwall in fair priced and decent housing, In NNP Policy G1(a), the Settlement Boundary, along the coast is intended to protect the coastal fringe from the inappropriate development which creates risks to beachgoers under coastal cliff as climate change increases, and indeed potential to homeowners themselves. The boundary here is a direct replacement of the former Restormel Borough policy that protected for many years 'Areas of Special Character', as the area concerned was identified, until that policy was superseded by the adoption of the current Development Plan of which the NNP is a key component. **Developments allowed in these precious and protected coastal areas, so important to the setting of the Town, are at a premium and are sold at premium prices, and often used as holiday**

homes; they play little to no part in meeting the important housing needs either of residents of Newquay or of Cornwall.

Elsewhere the Settlement Boundary is set wide enough not only to already support the achievement of well over its targeted housing growth, but also we believe allocates sufficient land to accommodate the additional housing targets the Government has announced. The current target is 4,400 dwellings by 2030 for the town and its locality, the highest target for any town in Cornwall. At the last annual review this was anticipated to be overachieved by 40%, providing over 6,000 units, a prediction that increases annually at each review. Building homes in Newquay has been popular in recent years and our Planning Committee has supported many and most applications.

A key concern for the Town Council's is that resolving this 'conflict' in such a manner has significantly undermined the NNP, and would appear to be likely to do similar harm to Neighbourhood Development Plans across the whole country. In our particular case, when held up against the CSADPD, Policy G1(a) **and the Coastal Change policies** now appear to have had a shelf life of just a matter of months, despite having been developed in conjunction with Cornwall Council Officers and being reviewed by the DPD team, as clearly shown in our Appeal submission. It is not true that the CSADPD was intended to override the policies of the NNP and specifically policy G1, indeed it notes the importance of NNP policies.

This situation is particularly frustrating when one considers that if the Examiner had identified the NNP as having needed anything more than a small handful of minor changes, then it may well have been adopted at a later date than the CSADPD. **Or, if the administration arrangements to adopt the CSADPD, a document largely written in 2017 which acknowledges that it was written before the NNP, had been more timely.**

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The argument that the NNP policies became out of date so soon after being adopted, and that the Site Allocations DPD policies superseded the NNP in such a short space of time remains strongly contested, despite the statements to the contrary in the CSADPD, remains strongly contested. It is the Town Council's contention that the Inspector has set a dangerous and worrying precedent that would potentially undermine all Neighbourhood Plans developed at a similar time to their respective Site Allocations DPDs. **And, locally, our experience is that this will put our precious coastal setting environment at risk, and as climate change risk increases from inappropriate and risky development in the years that it will take to implement the coming new Development Plan.**

We look forwards to hearing your view on this and are happy to discuss further if needed.

Yours sincerely

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