



Mr A Thomas (AHT Design)
The Old Chapel
Chapel Row
Widegates
Looe
Cornwall
PL13 1QB

Your ref:

My ref:

Date:

PA24/01407/PREAPP
29 January 2025

Dear Sir/Madam

**Pre-application
enquiry reference
Proposal**

PA24/01407/PREAPP

Pre-application advice for change of use of agricultural shed to ice cream manufacturing business and installation of septic tank.

**Location
Applicant**

Land Pt Os 9981 Widegates Cornwall
Mr And Mrs Gibson

I refer to your recently submitted pre-application advice form and attached details received on the 4th December 2024 regarding proposed development on land to the east of Widegates. I have taken the opportunity to review the proposal and would like to offer the following advice:

Site context:

This pre-application enquiry refers to a small parcel of land (forming part of a much larger agricultural field) located immediately east of Widegates and within an Area of Great Landscape Value. The parcel of land lies to the south of the wider field and accommodates one barn, hardstanding area and existing access onto a single-track lane to the south.

Proposal:

Change of use of agricultural building to ice-cream manufacturing business and installation of a septic tank.

Constraints:

- Area of Great Landscape Value

Site Planning history:

E2/08/00585/FUL - Construction of general purpose agricultural shed for storage of vegetables and machinery (Approved)

Development Management Service
Cornwall Council
Correspondence Address: Cornwall Council Planning Dept, New County Hall, Treyew Rd, Truro, TR1 3AY
planning@cornwall.gov.uk

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Relevant Planning Policies and guidance:

National Planning Policy Framework 2024:

Section 2: Achieving sustainable development

Section 4: Decision making

Section 6. Building a strong, competitive economy

Section 9. Promoting sustainable transport

Section 11. Making effective use of land

Section 12. Achieving well designed places

Section 14. Meeting the challenge of climate change, flooding and coastal change

Section 15. Conserving and enhancing the natural environment

Climate Emergency Development Plan Document February 2023

Policy C1 - Climate Change Principles

Policy G1 - Green Infrastructure Design and Maintenance

Policy G2 - Biodiversity Net Gain

Policy AG1 - Rural Development and Diversification

Policy T1 - Sustainable Transport

Policy T2 - Parking

Policy CC3 - Reduction of Flood risk

Policy CC4 - Sustainable Drainage System Design

Morval Neighbourhood Development Plan 2020 - 2030:

Policy 1: Sustainable Development and Climate Change

Policy 4 Protection and Enhancement of Biodiversity

Policy 5: Employment Development

Policy 8 Design Requirements

Policy 9 Transport, Accessibility and Parking

Policy 10. Flood Risk and Mitigation

Cornwall Local Plan Strategic Policies 2010-2030:

Policy 1 Presumption in favour of sustainable development

Policy 2 Spatial strategy

Policy 2a Key targets

Policy 5 Business and Tourism

Policy 12 Design

Policy 13 Development standards

Policy 16 Health and wellbeing

Policy 22 European protected sites - mitigation of recreational impacts from development

Policy 23 Natural environment

Policy 26 Flood risk management and coastal change

Policy 27 Transport and accessibility

Policy 28 Infrastructure

Caradon Local Plan first Alteration 2007:

CL9 - Areas of Great Landscape Value

Cornwall Design Guide 2021

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Balance of considerations:

Given that this is a desktop pre-application enquiry, I have not had the benefit of visiting the site. The advice below is therefore based on the information submitted alongside the application, and information already available, including the site planning history and aerial imagery.

Principle of development:

Following the introduction of the new National Planning Policy Framework (NPPF) in December 2024, Cornwall Council can no longer demonstrate a 5-year housing supply. The implications of this mean that housing policies within the Cornwall Local Plan (CLP) and the majority of Neighbourhood Development Plans (NDP) are deemed to be 'out of date' and carry limited weight in decision making. However, where the CLP policies remain in general conformity with the NPPF they should continue to be given full or substantial weight in decision making.

Due to the nature of the development proposed under this application, that being for a business use, it is considered that the relevant policies held within the CLP and Morval NDP do still carry full weight.

Paragraph 88 of the NPPF refers to supporting a prosperous rural economy and directs that decisions should enable the sustainable growth and expansion of all business types in rural areas, both through the conversion of existing buildings and well-designed new buildings as well and the diversification of agricultural businesses.

Paragraph 89 (NPPF) continues that planning decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.

Policy 5 of the CLP reflects the above, confirming that, amongst other things, to ensure a continued supply of appropriate business space, proposals for new employment land and uses (when in the countryside and smaller rural settlements) should be of a scale appropriate to its location or demonstrate an overriding locational and business need to be in that location such as farm diversification. Policy 5 of the Morval NDP also supports proposals that promote economic development, including adaptations to suitable existing buildings, renovations or re-use of farm buildings.

The proposed development in this case would involve the conversion of an existing agricultural barn to provide a use class B2 (general industrial) unit on land located within close proximity to the existing settlement of Widegates. Access into the site would require travelling along a short section of single-track highway.

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It is possible that the scale of the proposed development *could* be considered appropriate for this location, however further details would need to be submitted alongside any future application to demonstrate how the business intends to operate, including the number of likely trips for staff and deliveries, and whether the unit would be used for selling goods to the public.

There is also some concern that there is no overriding business or locational need for this development in this location. As set out within the submitted supporting documents, milk and cream is imported from a Cornish supplier, rather than being produced on site. This raises the question as to whether there is a need for the development to be located in this rural position as opposed to an existing industrial unit/estate. If a full application were to come forward, we would expect to see the submission of sufficient evidence to demonstrate why the business needs to be located here.

Impact on the setting:

The site lies within an Area of Great Landscape Value where consideration must be given to preserving the character and distinctive landscape qualities of the area (Policy 23, CLP). Saved Policy CL9 (Caradon Local Plan) confirms that 'Proposed development in the AGLV will not be permitted if it would materially harm the character of the particular area and if it does not closely reflect the traditional building styles and local materials, or the characteristic pattern of settlement, in the particular area.

Policy 12 of the CLP refers to design and directs that development should demonstrate a design process that has clearly considered the existing context, and how the development contributes to the social, economic and environmental elements of sustainability through fundamental design principles. This includes but is not limited to; Creating places with their own identity and promoting local distinctiveness while not preventing or discouraging appropriate innovation. Being of an appropriate scale, density, layout, height and mass with a clear understanding and response to its landscape, seascape and townscape setting.

Limited information is provided with regard to any external changes that might be required to accommodate the proposed use (if any). If alterations to the building are proposed these should remain in keeping with the rural character of the existing building and its setting.

Impact on neighbour amenity:

Residential properties lie within close proximity of the site (west). Careful consideration will need to be given to protecting occupants from unreasonable noise and disturbance (Policy 12, CLP). A noise and odour impact assessment should be submitted alongside any future application.

Ecology and biodiversity net gain:

A phase 1 ecology survey will be required alongside any future application.

The Councils BNG officer has provided the following advice with regard to the requirements set out in Policy G2 of the Climate Emergency Development Plan Document.

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Site and context: The site is located on the outskirts to the east of Widegates. The proposed development is for change of use of an agricultural shed to an ice cream parlour and the installation of a septic tank. From aerial imaging, it appears the current site is agricultural land with a barn and area of hardstanding along with a hedge boundary. The site is surrounded by a mixture of residential and agricultural areas. It is within the Cornish Killas National Character Area.

Cornwall declared a Climate emergency in 2019 and an Ecological emergency in 2022. As a result, the award-winning Climate Emergency Development Plan Document (CEDPD) has been published which aims for all new developments to protect Cornwall for the future, working to reduce climate change as well as protecting and enhancing the environment. The CEDPD is made up of 22 policies which can all work together to bring the most beneficial outcomes. Cornwall was an earlier adopter of BNG which has since been made mandatory in England highlighting the importance of leaving the environment in a better state.

Biodiversity Net Gain (BNG) is now statutory by schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). This means all development, unless exempt, must provide a 10% uplift on biodiversity units from the pre-development baseline as set out in the biodiversity metric calculation tool. BNG can be achieved through on-site units, off-site units or statutory credits. List of relevant documents submitted with pre-application information:

Pre-application Form and Attachment.pdf

28NOV2024 drawings AHT GIBSON 4289-1 block plan (A3).pdf

Relevant legislation and policies:

Environment Act 2001

Natural Environment and Rural Communities Act 2006

Town and Country Planning Act 1990

National Planning Policy Framework (NPPF)

Cornwall Local Plan - Policy 23 Natural Environment

Cornwall Climate Emergency DPD Policy G2 Biodiversity Net Gain

Draft Local Nature Recovery Strategy

Relevant constraints:

Designations:

- The site is not designated as a statutory protected site.
- The site is not within a Local Nature reserve. Seaton Valley North is approx. 1.7km to the southeast. There are no National nature reserves in the immediate area.
- The site is not within a Special Area of Conservation and there are none in the immediate area.
- The site is not within a Special Protection Area and there are none in the immediate area.
- The site is not within a National Landscape (AONB).
- There are several County Wildlife sites near to the proposed site. Lower Seaton Valley can be found approx. 500m to the southwest and Upper Seaton Valley approx. 1km to the east of the site. Tregastick and Blacketon Woods is approx. 1.4km to the north of the site.

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- The site is not in a SSSI but does come within a SSSI impact zone. Clicker Tor Quarry is approx. 3.5km to the north. There are also several SSSI sites approx. 8km to the east and 2 SSSI approx. 8km to the southwest of the site.
- The site is not currently situated in an opportunity area or as part of an existing nature network according to the Cornwall and Isles of Scilly Nature Recovery Network Maps Map | CIOS LNRS but is close to wildlife rich grassland areas. The LNRS is still a draft version and has been out for consultation. There may be changes to the LNRS and mapping when it becomes adopted.
- There is no watercourse present or within 10m of the site.
- There is Deciduous Woodland Priority Habitat approx. 350m to the southwest of the site.
- There is Traditional Orchard Priority Habitat located approx. 430m to the southeast of the site.
- No ecological surveys have yet been carried out on site. It is not known if any protected or invasive species are on site or if any mitigation work might be needed.

A Biodiversity Net Gain metric has not been completed and no unit values have been calculated.

Advice:

Since April 2024 BNG has been mandatory for both major and minor planning permission applications and is needed for the majority of cases unless it meets the criteria of an exemption. The Biodiversity Gain Requirements (Exemptions) Regulations 2024 state exactly what the exemptions are. From this it is clear that the application will not be a Householder application, Self-build or Custom build, part of the High-Speed Railway Transport Network or a Biodiversity Gain Site. From the details provided, it is not known what size area will be impacted for the extension and installation of the new septic tank. If the size of area to be impacted (which means lost or degraded in anyway) is less than 25m² including any cumulative totals for area habitat or 5m for linear habitat than the application may fall under the de-minimis exemption. Using MAGIC mapping it appears that there is no priority habitat on site, but this is not a guarantee of its absence.

If the application does fall within the de-minimis criteria, this must be clearly evidenced and justified for validation of the application. This would need to include a description of the development, the existing site plans, proposed site plans clearly showing the size of any development and what the development's area size is in square metres. If it is still not clear from this evidence if the application will be de-minimis or not, further justification may be needed. A pre- and post-development biodiversity metric may be used to clearly demonstrate which and how much habitat is to be impacted.

If the area which will be impacted is greater than 25m² of area habitat or 5m linear habitat, then the de-minimis exemption will not apply and BNG would be needed. A biodiversity metric would need to be used and completed by a competent person with the relevant qualifications and/or experience. If the application proceeds as a minor application the statutory biodiversity metric calculation tool (SBMCT) or the small sites metric (SSM) could be used. The definition of a competent person to carry out the associated work for the metric does differ between the two types and reference

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should be made to the user guides to assess competency. The SSM does have strict limitations and may not be suitable for the site. Please see the user guide for a full list of the restrictions of the SSM. If the development is within a designated site, has priority habitat or has the presence of a European Protected Species (EPS) then the SSM cannot be used and the SBMCT must be used. As the SSM is a simplified version it does not contain the same number of habitats as the SBMCT. If there is a habitat onsite which is not listed in the SSM then it cannot be used and the SBMCT must be used instead. If a SSM is submitted and later found to be unsuitable, a SBMCT will be requested. The SSM has no option to add details of off-site units so if these are required, the SSM will need to be converted into a SBMCT which may be a service offered by a habitat bank, but this is not guaranteed.

The baseline values should be calculated at the earliest opportunity to help inform site design from the initial stages. The baseline will need to include all habitat types within the red line boundary. The habitats receive a unit score in the SBMCT calculated from habitat area, distinctiveness, condition and strategic significance. The habitat distinctiveness is automatically calculated, and the draft Local Nature Recovery Strategy may be used to assign strategic significance. To work out habitat conditions in the SBMCT, the condition assessment sheets need to be used and submitted as evidence as stated in the metric user guide. Good practice would be that these sheets are filled out including the notes/justification column, indicating species presence and ideally two photos per habitat parcel. Any condition assessments should follow ecological good practice principles and be done at the most relevant time of the year.

When working out post-development values and possibilities, it is essential that the trading rules are followed and there can be no swapping of units between modules (e.g. area, hedgerow or watercourse). Details of the specific trading rules can be found in the metric user guide and apply up to the point of no net loss. The idea of the trading rules is to generally replace lost habitat with like for like or better. After no net loss is reached, creation or enhancement of any habitat type can contribute to the required 10% gain.

Currently, the proposed development as set out has a potential to result in an impact of current agricultural land. An impact would result in a loss of BNG units. Improvements to condition or habitat type to other area habitats on site could result in an increase of BNG units. Depending on how the septic tank is to be installed, some impacts to habitat may be classed as temporary. A temporary impact is regarded when the baseline habitat type and condition can be restored within two years of the initial impact. If this is possible then the habitat does not need to be recorded as lost. If the area is also to be enhanced, this can be recorded along with a 1- or 2-year delay in starting habitat enhancement.

If grassland is retained from the baseline, thought should be given as to if this could be improved, either by enhancing condition or if suitable, seeing if the type of grassland could be changed to a higher distinctiveness. Inclusion of more wildflower species where appropriate may help to encourage pollinator species which can also link to the wider environment and other site enhancements for pollinators such as the inclusion of bee bricks. Please note inclusion of bee bricks or nest boxes while beneficial for nature, do not count towards BNG units. Although, the LNRS has not

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mapped the site area as an opportunity area, it is close to areas mapped as opportunity areas for enhancing/creating species rich grassland. It would be advisable to avoid any impact to hedges if possible. However, if the development does impact a hedge causing a decrease to units, there would be potential to make up for it onsite. This could be done by improving the condition of existing hedges or the creation of new hedges, providing valuable habitat and also helping to act as a corridor for wildlife. If there are any invasive species on site, these should be managed appropriately, and their eradication may help to improve the condition of baseline habitats. It should be possible to make up for any loss and reach 10% gains on site.

On-site enhancements can be deemed as non-significant or significant. The examples of non-significant on-site enhancements are limited to private gardens and container planting schemes. Anything more than this can be deemed as significant on-site enhancements. If you believe any on-site enhancements should not be deemed as significant, you will need to provide thorough justification for this. Significant on-site BNG will need to be legally secured and monitored for a period of at least 30 years. A Habitat Management and Monitoring Plan (HMMP) will be expected to be submitted detailing how the habitats will be managed to their target habitat/condition and then how these will be maintained for the rest of the monitoring period and who is responsible for it.

The BNG technical guide by CIEEM sets out the BNG mitigation hierarchy which should be followed. This means that any medium distinctiveness habitats or above, should be avoided where possible and any impact lessened. If this is not feasible then onsite enhancement and creation should be considered where appropriate before going to off-site units. Off-site units are only acceptable as long as the hierarchy has been followed. As a last resort and in exceptional circumstances there are statutory credits, but these would need to be agreed with Cornwall Council in advance.

Timeline:

The national and local requirements for information on BNG needed for submission with an application can be found in the Cornwall Council Validation Guide.

If you are planning to use land for off-site gains and it has not been legally secured and registered, the s106 agreement must be entered into before planning permission is granted as per the government guidance.

Once a planning application has been granted permission, the final version of the Biodiversity Gain Plan can be submitted a minimum of 1 day after receiving planning permission with a fee of £145. The final Habitat Management and Monitoring Plan (HMMP) for any significant on-site gains and if applicable off-site units should also be submitted. Off-site units should be detailed giving the unique site reference number. The units in the plan will be cross checked to make sure they have been allocated and that the site is registered. It can take up to 8 weeks to approve a Biodiversity Gain Plan, unless another time scale is agreed, and no development may commence until the Plan has been approved by the LPA in writing.

Helpful links:

[Statutory biodiversity metric tools and guides - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/statutory-biodiversity-metric-tools-and-guides)

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[Biodiversity net gain - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

[Biodiversity gain plan - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

[Creating a habitat management and monitoring plan for BNG - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

[BS 8683:2021 | 31 Aug 2021 | BSI Knowledge \(bsigroup.com\)](https://bsigroup.com) Process for designing and implementing Biodiversity Net Gain

[LINC | Cornwall's Natural Capital Exchange \(linc-cornwall.com\)](https://linc-cornwall.com)

[BNG-Technical-Guide-2024.pdf \(cieem.net\)](https://cieem.net)

[Biodiversity net gain. Good practice principles for development. A practical guide \(cieem.net\)](https://cieem.net)

IMPORTANT

Off-site units are acceptable only when the mitigation hierarchy has been adhered to and it is not possible to fulfil the requirement to reach a minimum of 10% net gain on the development site.

Please be aware that if recommendations contained within this pre-application advice are not actioned as part of any forthcoming application submission, the requirements of biodiversity net gain will not have been met and we will not be supporting the scheme.

This pre-application advice is only for BNG and does not constitute as Ecology advice. If any ecological advice is needed it will need to be provided separately.

Submission of planning application

Documents to include:

- A BNG statement (please refer to the Validation guide for National and local requirements as to what needs to be included in this)
- The metric calculation showing pre-development values (as a minimum) submitted as a macro disabled excel file (.xlsx).
- The condition assessment sheets (these can be submitted as an appendix in a BNG statement/report or ecological report)
- A plan, drawn to an identified scale which must show the direction of North, showing onsite habitat existing on the date of application (or an earlier date), including any irreplaceable habitat.
- Information about irreplaceable habitat or any degradation (specific information is detailed in the validation guide).

If you would like to revise your scheme to incorporate the recommendations outlined in this advice with a completed metric (comprised of pre-development and expected post-development values) and referred back for the Council's review (within 21 days or an agreed timescale), a certificate of compliance can be issued which can be used to show agreed compliance during the application process.

Please note: Mandatory BNG does not take precedence over any other environmental or ecological legislation. Any changes to the site plans or new ecological survey information may change the proposed post-development values for the biodiversity metric calculations. It does not guarantee approval of the final Biodiversity Gain Plan needed to discharge the biodiversity gain condition before development may

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commence. This advice is strictly related to BNG only and does not provide advice for any ecological matter. This advice is subject to changes to legislation.

You should note that this letter does not constitute a formal decision by the Council (as local planning authority). It is only an officer's opinion given in good faith, and without prejudice to the formal consideration of any planning application. However, the advice note issues will be considered by the Council as a material consideration in the determination of future planning related applications, subject to the proviso that circumstances, and information may change or come to light that could alter the position. It should be noted that the weight given to pre-application advice notes will decline over time. This advice is valid for 6 months from the date of this letter. This correspondence concludes your pre-application advice at this stage but should you require further advice this can be arranged by contacting the case officer who can provide guidance on the appropriate fees and subsequent course of action. If no further contact is made within the next 21 days it will be presumed that you do not require any further advice and the matter is concluded.

Following the closure of the case, any new enquires will require a new pre-application submission and appropriate initial fee.

Highways Safety:

Policy 27 (CLP) requires all development to provide safe and suitable access for all people without causing significant adverse impacts on the local road network.

The Council's Highways officer has provided the following advice:

'I recommend a pedestrian access is provided with suitable visibility splays to the west of the site, 0.5 by 18m.'

Community Infrastructure Levy:

The Community Infrastructure Levy (CIL) Charging Schedule came into effect in Cornwall on 1 January 2019. This means that any development granted permission after this date may be liable to pay the levy. CIL allows local authorities to raise funds from new building projects undertaken in their area. It is governed by the CIL Regulations 2010 (as amended). CIL is charged as a fixed rate per square metre of new floor space created. The money raised can be used to help fund a wide range of infrastructure that is needed to support development. The CIL Charging Schedule sets out the rates charged on new development in Cornwall. It also details the types of development that will not be charged and those that can apply for exemption/relief from paying CIL. Since 1 January 2020, indexation has applied to the adopted rates. These are set out in the Annual CIL Rate Summary 2023. This shows the rates that will be applied to permissions granted during the calendar year 2023.

All full planning applications, including householder applications and reserved matters following an outline planning permission, and applications for lawful development certificates, are required to submit a CIL Form 1: Additional Information form. You are encouraged to submit this form with your planning application as it may delay registration and validation of your application without it. Completion of this form will enable the Council to determine whether the development might be required to pay a CIL, or whether it is eligible to apply for relief.

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For more information on CIL and how it may affect your development, please visit the Council's website at www.cornwall.gov.uk/cil. Please send any queries to cil@cornwall.gov.uk

Community engagement:

It may be beneficial to discuss your proposal with the Local Council for the area:
Morval

Parish Clerk - clerk@morvalparishcouncil.org.uk

and / or the Divisional Member for the area:

Cllr Armand Toms

cllr.armand.toms@cornwall.gov.uk

Conclusion:

To summarise the above, there may be some support for the proposed development, however further evidence will be required to demonstrate a business or location need for an industrial premises in this location, as well as the submission of supporting surveys to demonstrate noise and odour would not become an issue to neighbouring residential properties. Should a full application come forwards in the future, we would expect to see full consideration given to the points raised above, as well as the submission of the relevant reports/surveys as discussed.

Building control:

Cornwall Council's Building Control Service can advise whether a Building Regulations application is likely to be required for your proposal, and are able to offer a pre-application advice service for works that are controlled under The Building Regulations. You can find more information at www.cornwall.gov.uk/buildingcontrol or you can email us with details of your project buildingcontrol@cornwall.gov.uk

Consultation on the Cornwall and Isles of Scilly Nature Recovery Strategy

The Cornwall and Isles of Scilly Nature Recovery Strategy is now out for consultation until 6th January 2025: [Cornwall and Isles of Scilly Nature Recovery Strategy | Let's Talk Cornwall](#). Policy G4 of the Climate Emergency Development Plan Document (DPD) will be applied to all applications (unless excluded) validated after the date the strategy is adopted. The strategy is likely to be adopted in Spring 2025. The strategy will also support a strategic approach to off-site BNG delivery.

The Environment Act 2021 creates a statutory obligation for Cornwall Council to produce a Local Nature Recovery strategy every 5 years. Local Nature Recovery Strategies are based on the Lawton Principles that nature recovery should be "bigger, better and more connected". The LNRS will steer coordinated local action to support the delivery of the national 25 Year Environment Plan – which aims to create a Nature Recovery Network of 500,000 hectares of additional habitat in England. Our strategy describes opportunities and priorities for Cornwall to help nature recover. It is the Strategy that informs the detail of the map-based Local Nature Recovery Network.

The Network is a map-based representation of the Strategy. Zones 1 and 2 comprise the Nature Recovery Network:

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- Zone 1: Existing Nature Recovery Network (15% of Cornwall's land area): Zone 1 includes areas currently benefiting from existing environmental protection: Sites of Special Scientific Interest, Special Protection Areas, Special Areas of Conservation, National Nature Reserves, and Marine Conservation Zones. When combined with our Local Nature Reserves, County Wildlife Sites (which has lesser levels of protection) and irreplaceable habitat, these sites collectively make up the best-known existing areas for nature. The Existing Nature Network and environmental designations featured within it, are all subject to existing national and local policies and legislation, which must be adhered to when considering any activity within Zone 1.
- Zone 2: Nature Recovery Opportunity Areas: This is made up of non-statutory designations and irreplaceable habitats within the Existing Nature Network, priority habitats that are not currently designated (and should be retained and restored as part of any project or development), areas of existing habitat (that can be restored and enhanced to provide greater benefits to wildlife) and areas that could be suitable for habitat creation.
- Zone 3: Recovery beyond the network: Nature recovery can take place anywhere.

The Local Nature Recovery Strategy (LNRS) provides more information on these zones. Policy 4 of the Climate Emergency DPD requires that 'where development is sited within or adjacent to an adopted Local Nature Recovery Network it should demonstrate how the proposal will maintain and enhance the integrity and connectivity of the network and support the principles of the Local Nature Recovery Strategy.' There is no adopted Local Nature Recovery Network at this time and this policy will not be applied until one is in place.

You can view the draft nature recovery network maps here: [Map | CIOS LNRS](#). You can find further guidance on how to use the mapping tool here: [CIOS LNRS](#)

Interaction of the LNRN with BNG

The Defra Biodiversity Metric measures and scores the extent, type and quality of habitats to determine whether the net gain achieved is sufficient and appropriate. Through our extensive mapping work, the Strategy seeks to direct development away from higher nature-value land and incentivise delivery of offsets in the most beneficial locations for nature recovery. The Strategy can support a strategic approach to off-site BNG delivery, agreeing locations to expand and connect existing habitats and provide nature-based solutions. By helping to determine the 'strategic significance' aspect of the biodiversity metric, the Strategy aims to incentivise the delivery of off-site BNG in the LNRN.

Cornwall Design Review Panel

Cornwall Council expects all new development to be of the highest quality, and we are committed to raising the standard of design. The Cornwall Design Guide (CDG) 2021 provides a guide to delivering high quality places in Cornwall. This recognises the important role that the Design Review Panel plays in embedding great design practice.

The new Cornwall Design Review Panel (CDRP) is an independent body comprising architects, urban designers, landscape architects, engineers, transport planners, heritage experts and other design-related professionals. Panel members have a local interest and

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recognised expertise in their field to provide design support in the assessment of development proposals.

Its purpose is to encourage design excellence and draws on a pool of external design expertise. It should be seen as a forum within which developers and their teams are able to test and refine ideas and is therefore best consulted within the pre-application period. CDRP does not have any statutory planning function but its advice reports are a material consideration in our decision-making.

The nature of the review is proportionate to the scheme and can be used for both large, small-scale and sensitive development. Please see Cornwall Design Review Panel - Cornwall Council for further information on the panel and how to submit a scheme for review.

Access and facilities for Fire Service

Cornwall Council Building Control, Planning and the Fire & Rescue Service have produced guidance on water supplies for firefighting and access for fire appliances. The Guidance can be found on the Council's 'Additional Development Guidance' webpage via the link as follows: <https://www.cornwall.gov.uk/planning-and-building-control/planning-advice-and-guidance/planning-technical-guidance/>

You should note that this letter does not constitute a formal decision by the Council (as local planning authority). It is only an officer's opinion given in good faith, and without prejudice to the formal consideration of any planning application. However, the advice note issues will be considered by the Council as a material consideration in the determination of future planning related applications, subject to the proviso that circumstances and information may change or come to light that could alter the position. It should be noted that the weight given to pre-application advice notes will decline over time and that the Local Planning Authority dispose of pre-application records after three years. Therefore, pre-application records that are more than three years old will not hold any weight in the subsequent determination of related planning applications.

Yours faithfully

Shauna Vandermeulen

**Development Officer
Development Management Service
Tel: 01872 322222
Email: planning@cornwall.gov.uk**