

Cornwall and West Devon Mining Landscape World Heritage Site SPD Consultation statement

Persons the local planning authority consulted when preparing the supplementary planning document

A draft of the SPD was released for public consultation from 30th January until 31st March 2016. The public consultation included:

- Loading the document on the WHS website, with an online questionnaire to capture views
- Providing hard copies for display in one stop shops, council offices and public libraries in Cornwall and the West Devon Borough Council areas
- Sending links to the report with a covering e-mail or letter to all 55 Parish and Town Councils in the WHS areas
- Circulating links amongst colleagues, partner organisations and the Cornish Mining WHS Consultative Forum

The consultation was publicised widely in Cornwall and Devon, with coverage in local and regional papers.

Summary of the main issues raised by those persons

The online questionnaire comprised ten multiple choice questions, and used the 'Netigate' online consultation survey platform, and the results of this plus e-mail responses (general public and others) can be distilled as follows:

- Q1: Enquired as to the age range and genders of the responders
- Q2: 44 per cent were aware that they lived within a World Heritage Site area
- Q3: 100 per cent correctly identified the World Heritage Site area within which they lived
- Q4: 77 per cent indicated that the Draft SPD aided their understanding of the World Heritage Site designation
- Q5: 77 per cent stated that the Draft SPD aided their understanding of where the World Heritage Site is and why it has the status
- Q6: 77 per cent indicated that the Draft SPD aided their understanding of the attributes which together comprise Outstanding Universal Value
- Q7: 77 per cent indicated that the Draft SPD helped their understanding of how the planning system will be used to protect the Outstanding Universal Value of the World Heritage Site
- Q8: 66 per cent indicated that the Draft SPD aided their understanding of what impacts a development might have upon the World Heritage Site
- Q9: 50 per cent stated that the Draft SPD helped their understanding of what information would be required when submitting a planning application
- Q10 in response to the question: 'What sources of information would you prefer to use or would be helpful for this?' the greatest number of responses preferred that World Heritage Site related planning advice be

made available via the planning pages of the local authority website with the next highest number choosing the same provided by the planning advice page of the Cornish Mining website

Of the public bodies and heritage consultees that responded, generally the responses indicate the Draft SPD was well received. Its comprehensiveness was commended specifically by a number of responders.

A brief summary of some of the principal issues/concerns noted by public bodies and heritage consultees included:

- **Historic England:** the principal concerns within the Historic England response related to the perceived clarity of the document in indicating its intended audience. The linear form and hierarchical structure of the draft document, it was thought, might constrain its use and therefore limit effectiveness. Historic England expressed hope that the interactive PDF format version currently in development will address these concerns. HE also suggested the document should equate Outstanding Universal Value (OUV) to significance as defined in the NPPF, noting that the PPG at para 031 outlines, *'The cultural heritage within the description of the Outstanding Universal Value will be part of the World Heritage Site's heritage significance and National Planning Policy Framework policies will apply to the Outstanding Universal Value as they do to any other heritage significance they hold.'*
- **Natural England:** recognised the value in having an SPD for the Cornwall and West Devon Mining Landscape World Heritage Site and is supportive of the work undertaken in its development. Principal issues/concerns raised within the Natural England response include the mixing of emerging and adopted local plans within some of the tables, and the potential for confusion caused by the mixing of statutory and non-statutory designations. Also recommended the inclusion of other protective designations such as County Wildlife Sites and possible Special Areas of Conservation as these could potentially overlap with the World Heritage Site areas.
- **ICOMOS UK:** welcomed the development of the SPD and its potential to aid understanding of how change might impact on the OUV of the WHS and how planners can best manage this change. The potential of the SPD to provide clarity to applicants, decision-makers and other stakeholders in the management of the World Heritage Site and its OUV was also welcomed: *"We hope that the SPD will assist in reducing the threats to OUV, particularly from inappropriate development within the WHS or its setting"*. They also referred to the terminology used within the document as this relates to OUV. The introduction of the terms 'aspects' and 'qualities' when used in addition to 'attributes', and the distinction made between 'heritage assets' and 'cultural landscapes' was regarded as confusing. ICOMOS UK also stated that *"The word 'significance' is not used by UNESCO for the overall value of WHSs and the references to 'OUV and Significance' are confusing, as they imply two different concepts. There should be a clear focus in the document on OUV."*

Two partner Local Planning Authorities commented:

- **Devon County Council:** recommended the use of the full title of the World Heritage Site – ‘Cornwall and West Devon Mining Landscape World Heritage Site’ - in preference to the popular title of ‘Cornish Mining World Heritage Site’. Also highlighted the need to reference landscape character assessments where these form the basis of local plans, and suggested amending references to the status of Neighbourhood Plans and the Waste Plan for Devon.
- **Cornwall Council (Mineral Planning):** noted that policies within the emerging Cornwall Local Plan (CLP) have changed since the consultation draft SPD was released, so should be amended within the SPD once the final wording of the CLP is clear; also suggested the inclusion of the minerals’ policies stated within the emerging CLP. Cornwall Council’s emerging Site Allocations DPD should also be referenced as this will allocate land for housing and employment.

How those issues have been addressed in the supplementary planning document

The document has been restructured so that it follows a more logical format and brings together the relevant themes and information into sections that enable the reader to utilise the SPD in the most efficient way.

The document can now be broadly characterised as breaking the WHS issues down into three broad areas as follows;

1. Background and context of the WHS (including protections, policy, OUV, etc.)
2. The location and setting of the WHS (including information on attributes, OUV, etc.)
3. Assessing the impact of development (bringing together information on authenticity, integrity, positive and negative outcomes, WHS Management Plan Policy, HIA, etc.)

In doing so the content of the SPD has not been altered, other than clarifying some terminology, reducing repetition and providing some explanatory text to ensure that the re-structured content reads as intended.

The document has also been altered to place some tables and background information (e.g. Permitted Development Rights, Planning Performance Agreements, designated asset categories, etc.) in appendices to reduce the length of the document whilst still retaining the content.

In working on the restructuring of the document further work has been undertaken that will result in an interactive PDF that will enable users of all levels (Officer, elected Members, developers, and the public) to access the SPD using a process flow that will link to the various pieces of information contained

within the SPD, and also external sources of information on relevant websites that will enable users to review relevant information at the pre-application stage.

This work is designed to complement the printed SPD and provide a further web-based resource that can be updated quickly, and inform any review of the SPD as and when required to ensure it remains as up-to-date as possible.