

LISKEARD NEIGHBOURHOOD PLAN 2017

REGULATION 14 CONSULTATIONS RESPONSE ANALYSIS

DRAFT VERSION 1

Steering Group Meeting 3rd April 2017

NOTE TO PLANNING COMMITTEE

This report includes suggested draft responses to the comments made by the community, statutory bodies, local and regional organisations, developers, and Cornwall Council during the Regulation 14 Pre-submission Consultation held from November 2016 to January 2017. Draft suggestions as to how the Neighbourhood Plan might be adjusted in response are also given.

INTRODUCTION

This report analyses the comments made in response to the formal community and statutory organisation consultations carried out on the Liskeard Neighbourhood Development Plan under Regulation 14 of the Neighbourhood Plan Regulations from November 2016 to January 2017. It also records the Steering Group and Town Council's considered responses to those comments, and sets out the modifications to the Liskeard Neighbourhood Development Plan that are proposed to be made in preparing the submission version of the Plan.

The main part of the document discusses the various comments made in the order of their appearance in the Plan.

Appendices in a separate document record the comments made verbatim, identifies the parts of the Plan which are referred to, and allocates a look-up reference number so that the response to each comment may be found.

SUMMARY

Overall the intentions and strategy of the draft Liskeard NDP has been well supported by the local community and local organisations. Statutory bodies have offered helpful advice. The comments received provide the basis for the Plan to be constructively amended to produce a local planning strategy that reflects local needs and aspirations. However, developers have criticised the housing delivery strategy and identified 3 sites beyond the proposed development boundary to provide several hundred more homes. Several responses have also identified technical issues with the document, such as typos, mapping errors etc, all of which are very helpful.

Community Response: A well-informed and intelligent response which shows a depth of concern by residents for the future of their town. Overall the vision and strategy of the NDP is supported, subject to some caveats around the detail on how it will be delivered. Positive views are expressed on the strategy to bring forward employment sites, not just as allocations, but also with the financial backing to see them develop, paced to match new housing provision. The proposals to help better skills training and assist in creating better paid jobs are also well received. Making best use of brownfield land for housing, instead of using green countryside and affecting the setting of the town, for further development is supported. The need to rebalance the housing mix is welcomed, but several mention the need for later-living accommodation. There is clear enthusiasm for Town Centre strategy measures that will enhance its function, improve pedestrian movement, and extend the range and quality of shopping opportunities offered, including the redevelopment of the Cattle Market site for a variety of uses such as a supermarket, community space for

"You have worked hard to engage with us in Liskeard and produced a detailed and comprehensive plan which is positive, but also shows we're a valued community deserving of care and consideration"

A Resident of Liskeard

all ages, employment etc, although some current users are concerned about the impact that closure would have on the agricultural community. The heritage of the town continues to be recognized and valued, indeed throughout the making of the plan people have seen the value of our culture and heritage (including the World Heritage Site) as being the basis for effective economic regeneration. There were many comments in support of the open space and leisure policies to protect and enhance play provision, as well as the heritage and landscape of the town and its hinterland, making it more accessible via paths and trails, and protecting local areas and views valued by residents for their health and well-being - whether for walking, running, cycling as well as a further idea of including an outdoor gym along some of these routes. The proposed new recreation area at Roundbury Park was very popular, for both formal and informal sport and play facilities (including an added suggestion for a running track). Policies on allotments, better connectivity, and safer crossings were all considered important.

However, many local respondents continue to be concerned, not only on the number of new houses we have to accommodate, but also the rate of delivery, and the need for the provision of jobs, town centre regeneration, and recreation and leisure facilities to keep pace, so that Liskeard grows steadily and keeps its character as a Cornish market town and doesn't just become a dormitory for people working elsewhere.

Local Organisations: Broad support is expressed by the local organisations that responded, subject to details in some areas. The Town Forum's response is positive and records its decision to set up a Regeneration Fund to assist the NDP's implementation, whilst the area's sports organisations are enthusiastic about the Plan's open space and leisure policies. Royal Mail ask that their town centre site be excluded from Policy TC1, whilst ECCABI ask for the project to develop a skills training centre be prioritised. The 6th Formers at Liskeard Community school have provided positive ideas for improvement, whilst Morley Tamblyn Lodge give their support and constructive comments as well.

Statutory Organisations: *Natural England* and *Historic England* share a concern as to how the plan presents its policies and proposals, pointing to a difficulty in understanding the difference between 'policies' and 'proposals', and the status of the list of urban capacity sites, but both provide helpful suggestions as to how these issues can be addressed. *Devon & Cornwall Police* express support for references to designing out Crime and make positive suggestions for additional material. Menheniot Parish Council supports proposals in the for the use of land at Bolitho Farm for agricultural technology and processing, noting how it makes a contribution to the wider CNA requirements.

Developer Responses: Three developers came forward during the consultation period (Persimmon, Wain Homes and M G Roberts Preliminary Planning Professionals Ltd) with proposals for future development outside the urban boundary shown in policy NP1. All three suggested that the current deliverable sites and allocated developable site, resulting in a projected surplus of 9% above the target up to 2030, were not enough, and proposed allocation of additional development sites. This is not accepted by the NDP as there is a more than adequate supply of deliverable (with planning permission) and developable sites (over 1500 homes) identified within the NDP to meet the need up to

2030, and fully supports the LPA's 5-year land supply – indeed we have over 10 years deliverable supply. In addition, policies allow for the release of further land should there be evidence of a shortfall in delivery over time following the trajectory set out in Cornwall's Housing Implementation Strategy. Although this plan covers the period to 2030 running in parallel with the Cornwall Local Plan, there will be opportunities over this period to review, consider and plan for future growth beyond 2030.

Cornwall Council Officers Response: This includes many helpful suggestions, also pointing out where the Plan replicates NPPF and CLP policy, and where there are policies that cannot be construed to have a planning purpose. For example policies on cross-subsidy of employment land release from housing developments, and the prioritizing of brown-field sites for further development were both questioned.

Response by the Liskeard NDP Steering group: Considerable effort has been put in to working up a response to the representations. Working with Historic England has led to greater clarity over the potential for development of brown-field sites. After discussion, the CC Open Space officer has provided additional information to clarify future standards for provision of open spaces linked to housing developments. Contact with CC Historic Environment team has helped to clarify the historic landscape character of the immediate hinterland, in support of the policy for extension of the AGLV as an area of local landscape and heritage value.

The suggested response to the representations made are given in the following tables, including:

- Measure to remove repetitions of NPPF and Cornwall Local Plan policies, whilst allowing people in the local community to understand the planning context in which individual policies sit, and provide a stand-alone document that clearly explains the holistic plan for the town to 2030, as well as being a working document for planners.
- Retention of policies on cross-subsidy of employment land release from housing developments, and the prioritizing of brown-field sites for further development, despite both being questioned, as they are seen as fundamental to what came out of public consultation and engagement and seek to support national and CLP objectives.
- Clarification of boundaries; enlargement of some maps;
- Enhancing employment policies to be clearer and precise; update in light of recent agreement with Menheniot Parish Council;
- Clarifying the position of urban capacity sites policy to comply with Historic England suggestions to support;

- In the Town Centre removing Postal sorting office from TC1, and making the cattle market policy more precise
- Enhancing the information on heritage landscapes, habitats and biodiversity, to support green corridors, and area of local landscape value, responding to suggestions for running track and outdoor gym facilities and updating figures on open space from CC's very recent document.

Note Responses are coded as follows:

A – Statutory Organisations

B – Local & Regional Organisations

C – Community

D – Developers

E – Cornwall Council Officers

TABLE 1 GENERAL COMMENTS MADE ON THE LISKEARD NEIGHBOURHOOD DEVELOPMENT PLAN

TABLE 1: GENERAL COMMENTS MADE ON THE LISKEARD NEIGHBOURHOOD DEVELOPMENT PLAN			
RESPONSE REFERENCE	SUMMARY OF ISSUES RAISED	STEERING GROUP RESPONSE	PROPOSED AMENDMENT TO NDP IF REQUIRED
A1[1]	<p>A1[1]: <u>Some</u> allocations fall outside the Plan Area. Only policies/proposals for land within the designated plan area should be included within the Plan.</p> <p>Any allocations on best and most versatile land must be justified in line with para 112 of the NPPF. <i>'NPPF 112. Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning</i></p>	<p>Explanation on Page 24 makes it clear that in some adjoining areas development proposals may occur or be desirable that directly impacts on the social, environmental and economic interests of Liskeard. It is therefore considered appropriate that the Liskeard NDP should make recommendations to the adjoining parishes and the Local Planning authority as to how these important areas of land might be dealt with in planning terms. However, the use of the word 'Proposal' in this context may be misleading and</p>	<p>Replace the word 'Proposal' on Page 24 and elsewhere in this context with 'Suggestion'.</p>

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	<i>authorities should seek to use areas of poorer quality land in preference to that of a higher quality.'</i>	cross-reference back to the explanation on p24 may help. Agricultural Land Classification was taken into account during the neighbourhood plan's assessment ranking in terms of sustainability and suitability. Also sites with current planning permissions or active planning applications have already been / are being examined under NPPF terms in that process.	
D2[1], D2[2]	D2[1]: Supports production of Liskeard NDP, but says that several changes are needed to ensure that the plan meets the Basic Conditions requirements D2[2]: Sets out a long exposition of the Basic Conditions requirements, the NPPF and the NPPG, and the Cornwall Local Plan.	D2[1], D2[2]: Noted	
A2[2]	A2[2]: Criterion Scoring methodology for assessment of the suitability of the proposed development sites does not meet requirements of NPPF to demonstrate an understanding of the significance of relevant heritage assets and that where harmful impact will occur that this is outweighed by public benefits which cannot be met in any other way. Therefore, cannot confirm that an SEA is not required, nor that the contents of the Plan are in conformity with the NPPF and Local Plan.	Following discussion HE accepted that no specific allocations were being made that did not have Heritage assessments and that the town centre sites were not allocations for which such assessments were required. It was agreed that the full housing capacity list should not be included in the draft plan to avoid the suggestion that they were approved allocations. It is anticipated that HE will amend their response to confirm that an SEA is not required and that the NDP is in conformity with the NPPF and CLP.	See consequential amendment to page 41
B1	B1: Supports the emerging NDP and willing to assist with the delivery of the proposals relating to the sympathetic regeneration through: <ul style="list-style-type: none"> £3,000 Regeneration Fund to support community groups on projects contained in the NDP. 	Noted and welcomed	Include reference to Town Forum role and fund in Delivery Plan section.

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	<ul style="list-style-type: none"> Assessing planning applications that may impact on the towns regeneration using the NDP as a marker 		
C2	C2: I agree with the main themes, employment to bring money into the town.		
C29	C29: A lot of work has gone into this. Lets hope Cornwall Council takes notice		
C31	C31: Really great that someone is taking an interest in Liskeard and the whole area		
C41	C41: You have worked hard to engage with us in Liskeard and produced a detailed and comprehensive plan which is both positive but also shows we're a valued community deserving of care and consideration - not just to be walked over by inappropriate development, with decisions taken elsewhere. Thank you.		
C84	C84: A succinct summary of Policies needed to engage public. Otherwise the document is a challenge for consultees to digest and comment on.	C84: The NDP has to be of use for a variety of audiences and some compromise in the language is inevitable. For this reason we created a plain English leaflet explaining the draft NDP.	
E2	<u>E2: Repetition of strategic policy.</u> Many policies of the NDP repeat the policies of the Cornwall Local Plan. This makes the Liskeard NDP a long document and may make it harder for developers and decision makers to identify the parts of policy which do add key criteria to strategic policy. We would advise you to avoid repetition of national or local strategic policy and focus on the elements of policy which identify local requirements. This is indicated in the individual policy section below.	E2: In most cases the intention is to add local requirements, and no CLP or NPPF wording has purposefully been used. However there are elements which may be perceived to repeat the intentions of strategic policy which have been included deliberately to help provide context and make sense of the local elements within policies so that it can be read as a stand-alone document for the community. These instances have been reviewed and where appropriate without loss of	See individual policy sections.

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		clarity have been adjusted in the light of the comment made.	
E8	<u>E8 Transport Issues:</u> Refers to the background of Connecting Cornwall 2030 and its Town Transport Strategy, which identifies and costs the transport measures required to support housing and employment growth as the basis for the collection of proportional contributions from developers. Also notes key aim of encouraging modal shift. Concludes that 'in general many of the policies contained within the Neighbourhood Plan align with the Town Transport Strategy and Local Transport Plan aims in particular where they relate to the provision of or supporting existing walking, cycling and public transport links'.	E8: Noted that Liskeard NDP and Town Transport Strategy are in alignment	

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Introduction Pages 5 – 10	No comments received			
Plan Preparation Process Pages 11 – 12	No comments received			
Planning Framework Pages 13 - 16	E1[1] C90[2], C90[3]	E1[1], C90[2]: The Cornwall Local Plan: Strategic Policies is now adopted and so reference to the former Caradon Local Plan should be updated. C90[3]:	E1[1], C90[2]: Accepted C90[3]: Many of these policies are effectively absorbed in the Cornwall Local Plan policies, or have been	P2 Update to note new status of the submitted document, referring to consultation has taken place and

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		Some useful policies 'saved' from Caradon plan are no longer, so need reinforcing through NP.	'retained' in the CLP, or captured in this NDP.	comments have been responded to in this document. Delete final paragraph. P16 Update paragraph referring to Caradon LP and identify which policies were carried forward.
Setting the Scene Pages 16 – 21	No comments received			
Overview of Community Engagement Page 22	No comments received			
Plan Vision, Aims. Page 23 – 24	A2[1], C7[1], B5[1], B9[1], C6[1], C11[1], C12, C15, C18[1], C34, C44, C48, C53, C54, C56, C65[1], C81, C89, C91, C101, C108	A2[1], et al: Plan is impressive, sophisticated and comprehensive document in its coverage of relevant issues. It is well written, easy to read, and provides a well-structure holistic outline for the future, that seems fair, proactive and reflects the views of the people of Liskeard	Noted and support welcomed.	
Development Boundary. Page 25 POLICY NP1	E4, B5[2], C3[3], C85[1], D1, D2[3], D3[1]	E4: <u>NDP Area</u> : It is good to consider the context of the plan area, but the Liskeard NDP cannot show allocations outside the NDP Area. The notional extension of the settlement boundary into Menheniot parish could be shown	E4: Accepted. As an alternative, amendment proposed to show the Tencreek Planning Permission (which is clearly a matter of fact, and not a policy of this NDP, and the 'suggestion' of a new employment	Delete final paragraph of 'Comment' and replace with; <i>'The built-up area of Liskeard now extends beyond the town's administrative boundary, which is also</i>

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		<p>if that area is allocated in Menheniot's NDP, but their plan has not reached that stage.</p> <p>B5[2]. Plan should show awareness of the proximity of the northern boundary to the built area of St Cleer Parish and an aspiration to prevent the coalescence of the settlements.</p> <p>C3[3]: Please ensure we keep to the development boundary at least to 2030</p> <p>C85[1] should say 'parish boundary' rather than 'parishes' plus should continue across Island Shop Jn</p> <p>D1: Suggests development boundary should wrap around additional land at Addington (see also comments on Policy H4)</p> <p>D2[3]: The settlement boundary is drawn too tightly and provides no flexibility for additional sites to come forward. CLP Paragraph 2.32, which identifies that Neighbourhood Plans can identify settlement boundaries, is intended to apply to rural settlements, rather than a key settlement under Policy 3 such as Liskeard.</p> <p>D3[1]: Development boundary should enclose land at Woodgate Road.</p>	<p>area made in Proposal EM3. B5[2], Concern is noted but coalescence is not considered to be a significant issue at this time as more suitable land for development is available elsewhere within the Plan period. C3[3]: The development boundary may need to be breached under the terms of Policy H5 if the trajectory of housing completions declines. C85[1]: Not understood. D1: See response under H4. D2[3], D3[1] Not accepted, there is nothing in the CLP says that Development Boundaries can't be used, and in any event, we have a policy that allows flexibility in policy H5.</p> <p>General Note: Comments received at the drop-in events identified small deviations in the marked boundary including at Trevillis Park.</p>	<p><i>the Designated Area for this local plan. Therefore, the proposed development boundary ceases at the extent of the Designated Area. Menheniot Parish Council, which is preparing its own Neighbourhood Development Plan, has been asked to similarly indicate the town development boundary, wrapped around the site of the Tencreek mixed-use development site, and the suggested employment site at Bolitho Farm'.</i></p> <p>Map: Amend development boundary to exclude the land outside the designated area and land mistakenly included at Trevillis Park.</p>
A Place to Work and Learn Pages 26 - 35	B5{3}, C7[1], C16,	B5{3}; C7[1], C16, C52, C65[3]: Support. Good quality employment is essential to the economic future of	B5{3}; C7[1], C16, C52, C65[3]: Noted. The NDP seeks to release a range additional employment land through	

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	C52, C65[3], E9	both Liskeard and its hinterland and is vital to support the development of housing. Safeguarding land for employment use is an important aspect of this. Mixed use sites should preserve the quality of life for residents in proximity to industrial uses. However, there should be more emphasis on encouraging self-employment opportunities and manufacturing jobs. E9: Where appropriate new employment development should look to facilitate safe and sustainable access to encourage employees to walk, cycle and use public transport to work. This should range ensuring links with current infrastructure are incorporated into new employment development, facilities such as cycle parking and showers are provided for employees and travel plans are in place where appropriate	the identification of sites and release of funding to enable their development. E9 – Note and comment. Sites have been selected to maximise access, alongside roads with bus services, pedestrian and cycle routes and local facilities, around neighbourhood nodes.	
Policy EM1 - Employment and Housing Balance.	C18[2], C79, E10, D2[4], D3[2]	C18[2], Jobs before housing, C79 Need more visitor accommodation. E10: developers cannot be required to provide up-front employment land or cross subsidy contributions. What would the contributions be used for? What is the evidence that land or contributions are required? There are employment sites that have been	C18[2], C79: Noted. E10, D2[4], D3[2]: Very little employment land has come forward in recent times because of a lack of choice and the reduction in public sector intervention funding. The policies of the NDP seek to redress this by identifying a variety of sites, encouraging mixed-use developments, and using planning mechanisms to	EM1all new larger housing schemes (30 or more dwellings) must contribute towards the need (as defined in the Cornwall Local Plan) for employment land, or servicing and development of such sites to facilitate the delivery of viable workplaces. ...

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		<p>allocated and have not come forward, so provision of land does not seem to be the issue.</p> <p>D2[4]: not clear how proposed contributions would comply with the tests set out in the CIL Regulations (122) and paragraph 204 of the NPPF. It is not reasonable to expect other developments to fund the resolution of a ransom strip issue to release the employment land at Charter Way (EM2B)</p> <p>D3[2]: Provision of employment land and residential housing on the same site is bad planning and will lead to an excess of B1 sites. To add industrial contributions of an unspecified amount without any set out mechanism to determine how those would be arrived at will inevitably impact detrimentally on site availability into the future.</p>	<p>release contributions for implementation. The implementation stages are:</p> <ul style="list-style-type: none"> • “assembling” land by purchasing from the various landowners; • “servicing” the land by the provision of roads and services; • “decision making and disposal process” of fully serviced employment plots to local and inward businesses. <p>To simply identify employment land and then not to undertake the other steps necessary to make the serviced employment plots really “available” adds a further 3 – 5 years to the development process. Furthermore, the clear majority of prospective private sector purchasers are not established to undertake the role. They are manufacturing or service specialists that require the timely construction of a new factory or office.</p> <p>There will be no take up of employment land even though it might be critically important if the other steps are not taken. This was recognised in the ‘Cornwall Employment Sites Study Liskeard July</p>	<p>At the bottom of EM1 – remove ‘the release of employment land’ replace with “ the release/development ...”</p> <p>Also put this into H3</p> <p>ENHANCE COMMENT WITH A PRECIS FROM THE FOLLOWING: Very little employment land has come forward in recent times because of a lack of choice and the reduction in public sector intervention funding. The policies of the NDP seek to redress this by identifying a variety of sites, encouraging mixed-use developments, and using planning mechanisms to release contributions for implementation. The implementation stages are:</p> <ul style="list-style-type: none"> • “assembling” land by purchasing from the various landowners; • “servicing” the land by the provision of roads and services; • “decision making and disposal process” of fully serviced employment plots to local and inward businesses. <p>To simply identify employment land and then not to undertake the other steps necessary to make the serviced employment plots really “available” adds a further 3 – 5 years to the development</p>

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			<p>2012' which recommended local action using Community Infrastructure Levy to enable development.</p> <p>Mixed use is usual in modern times and cannot be considered as 'bad planning'. Furthermore, mechanisms to fund on and off-site development of affordable and other housing are well developed and provide useful models to follow.</p>	<p>process. Furthermore, the clear majority of prospective private sector purchasers are not established to undertake the role. They are manufacturing or service specialists that require the timely construction of a new factory or office.</p> <p>There will be no take up of employment land even though it might be critically important if the other steps are not taken.</p> <p>This was recognised in the 'Cornwall Employment Sites Study Liskeard July 2012' which recommended local action using Community Infrastructure Levy to enable development.</p>
Policy EM2 – Employment Land Allocation	A1[2], C13, C32, D2[23]	<p>A1[2]: Policy should refer to a named plan showing the allocated sites and that each site is named on the plan.</p> <p>C13, C32: employment should in a sensible place near the main A 38 for lorries and deliveries</p> <p>C20 Liskeard needs an agricultural focus as it's in a rich farming area, especially if the cattle market closes.</p> <p>D2[23] Suggest additional allocation at Coldstyle Road (see comments on Policy H4 below)</p>	<p>A1[2]: Accepted. C13, C32: All the main sites are located near to the A38 or are easily accessible from that road.</p> <p>C20: EM3 specifically refers to its suitability for a grouping of businesses related to agricultural technology and processing.</p> <p>D2[23] Not accepted. See comments on H4.</p>	<p>Revise Proposals Maps and publish at an appropriate scale that allows for accurate interpretation and indexing of sites affected by NDP policies and suggestions.</p>

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Policy EM2A – North of Pengover Road	D2[5]	D2[5]: Support in principle, but allowance should be made within the policy for an element of A1 and A3 retail uses on the site. Also it is not necessary to access the site from Clemo Road	D2[5]: Accepted	Amend policy as follows: The development of the land north of Pengover Road must: a) Be for use classes B1, B2, B8, A1 and A3 only; and b) Be commenced in advance of/ concurrently with any development of adjoining land for residential development; and c) Ensure that the main vehicular access to the site operates safely in conjunction with the Clemo Road Industrial Estate Rd.
Policy EM2B – East of Charter Way	E10[2], D2[6], D4	E10[2]: There are employment sites that have been allocated and have not come forward, so provision of land does not seem to be the issue. D2[6]: Concerns there is no reasonable prospect of the site coming forward during the plan period as there are significant and fundamental constraints. The inclusion of a 'small element of housing' as proposed by the policy will be insufficient to overcome the issues. Alternative allocations should be considered to deliver the necessary employment land. D4: We support the objective in the Liskeard Neighbourhood Plan to bring forward employment on the site	E10[2], D2[6]: It is recognised in the 'A Place to Live' report that the site has not come forward due to various factors including the existence of a ransom strip across the only feasible access route and a lack of enabling funding'. The latter involved removal of specifically allocated funding by Cornwall Council in 2009. The NDP retains the site for employment development but also provides for cross-subsidy from housing, self-build residential development, live work units and recreational facilities, and potentially developments elsewhere. As a result, positive negotiations are now taking place and a scheme is expected to come forward in the future. Some clarification is necessary	Policy EM2B, Amend last paragraph by deleting 'small' and inserting '...an element...' Justification for EM2b on Page 30, top of second column: after '...NPPF ' insert: 'and be in compliance with the floorspace provision of ...' Justification for EM2b on Page 30, after "was removed by Cornwall Council", insert '..and the CLP does not allocate specific economic regeneration funding to Liskeard, provision....." Justification for EM2b on Page 30, line 7, after ...employment development, 'and recent positive stakeholder interest. This is...'

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		described as East of Charter Way... As owners of a large part of this land, we would be happy to enter into talks with a view to develop this site as an extension of the Business Park already in place at the Northern edge of our land. As stated in policy EM 2b we understand that this might involve a degree of mixed use depending on viability.	in a proposed amendment to avoid misinterpretation of the cross-subsidy from housing and provide further explanation. Regarding the need for additional land for employment, intention was to Learn from the previous situation and does not have just a single employment site whose development does not come forward but to look at several options as per the approach suggested in 2012 with the Cornwall Development Company study. The NDP policies EM1 and EM2 taken with existing permissions achieves this and exceeds the CLP requirement and so further land is not necessary. D4: support welcomed.	
Policy EM3 - Allocation of Employment Land Outside but Abutting the Liskeard Neighbourhood Plan Designated Area	A4, C85[2], E11, D2[7]	A4: Supportive of proposals agricultural technology and processing and other employment uses, and recognises the contribution it makes to a CNA wide requirement. C85[2]: Re 'proposal EM3' - should read 'policy...' E11: This cannot be a policy. Could be referred to in supporting text, but cannot have a policy which operates outside the NDP area. D2[7]: not clear from the evidence base as to whether there is agreement	A4, Noted and welcomed. C85[2], E11, This is not put forward as a 'Policy' but as a 'Proposal' as explained on page 24, 2 nd column, 3 rd paragraph. D2[7]: See statement by Menheniot PC to the effect that it 'supports proposals in the plan (A Place to Work & Learn) for the use of land at Bolitho Farm for agricultural technology and processing. Additional land that lies adjacent to Bolitho Farm, and is easily accessed from the main road network,	See comments on mapping at page XX and replace the word 'Proposal' with 'Suggestion' as elsewhere in this context.

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		with Menheniot Parish Council over the prospective allocation of the site, and furthermore whether the site is being actively promoted / deliverable.	is recognised as having the potential for other employment uses. The parish council is supportive of these proposals, and recognises the contribution it makes to a CNA wide requirement'. Active positive negotiating in hand.	
POLICY EM4 -Safeguarding Existing Employment Land	C60, E12	C60: Moorswater: extend employment area into Dobwalls parish to include industry units (china clay sidings) E11: Part of Moorswater estate is also outside the NDP area	C60, E12: Noted. In accordance with advice received the safeguarded area cannot be extended beyond the Designated Area of the NDP.	Add comment that the policy applies only to that part of Moorswater within the NDP designated area, and recommend that Dobwalls PC include similar provision for that part of the estate in their NDP area.
POLICY EM5 - Home Based Enterprise	E13	E13: planning permission is not necessarily required for home based working; if the overall character of the dwelling does not change as a result of the business then planning permission is not required. The proposed policy essentially describes the conditions that would mean planning permission is not required and is therefore redundant.	As explained on p 30 we know this .	EM5 add 'planning permission will be required if there are alterations to buildings, or the scale of business materially changes the use of the premises'
POLICY EM6 -The Development of an Innovation / Business Support Hub Project 2	B7, E14	Should be considered for high priority to take advantage of CLLD funding, which is expected to be available from March 2017 E14: where policies refer to a site this should be shown on a clear map (eg Liskeard School)	B7, Accepted E14, Accepted, but it would be inappropriate and confusing to show the whole school site under this policy, therefore removal of specific reference to school is preferred.	(1) Amend Delivery Plan to show this Policy and Project as a high priority. (2) Retain '...and' - Remove 'also on land ... Liskeard School" from Policy EM6
POLICY EM7 - Redevelopment and	C60, E15	C60: Moorswater: extend employment area into Dobwalls parish to include	C60, see response on Policy EM4.	Amend line 4 of EM7 to read '...upgraded <i>business and employment</i> premises....'

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Enhancement of Existing Employment Sites		industry units (china clay sidings) E15: think the intention of the policy is to retain employment use, but the policy could be interpreted as allowing redevelopment (ie for housing.) please clarify.	E15, Accepted: revised wording proposed.	
POLICY EM8 -Small Workshop Development in the Countryside	E16[1] E16[2]	E16[1]: the policy repeats some of the criteria of CLP Policy 5, but adds extra criteria (g) Do all the criteria (a-g) have to be met? It may be better to separate out the policy for new build and the policy for conversions –it appears that conversions are preferred and new build will only be allowed if an existing building cannot be converted. E16[2]: The additional criteria relating to the conversion of listed buildings are covered by strategic policy	E16[1] Not accepted, Policy EM8 adds appropriate and precise local criteria to clause c) of CLP Policy 5* and does intend to prioritise conversions of existing buildings over new build as this more sustainable within the terms of NPPF 28. It is intended that all criteria a) to g) must apply, and h) to j) where conversion or CoU requiring planning permission occurs. E16[2] Accepted. *in the countryside and smaller rural settlements 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;	After criteria g) insert 'and' – After j) remove listed building criteria and insert 'where development involves conversion or change of use of a listed building, CLP strategic policy 24 will apply'
A Place to Live 36 - 47	C7[3], C93, E17	C7[3], C93 : Support E17: Supportive of improved access to the town centre and neighbourhood facilities by walking, cycling and public transport improvements as part of new development	C7[3], C93, E17: Support welcomed.	
Policy H1 -Meeting the Housing Requirements of	C19, C12, C22, C23, C35,	C19, C12, C22, C23, C35, C105[1]: We've taken on board a lot of houses as stipulated by Cornwall Council but	C19, C12, C22, C23, C35, C105[1], D2[8]: The housing 'apportionment' for Liskeard is set out in CLP Table 1	After '...urban extensions...' delete '...will be supported' and replace with: '....as indicated on the proposals map and

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the Cornwall Local Plan to 2030	C105[1], E3, E18, D1[2], D2[8], D3[3]	<p>what happens when more developers want to build here when we've already got enough for years to come? Liskeard must not become a characterless dormitory town – it should grow steadily. More housing should be targeted on surrounding villages to make them more sustainable and reduce pressure on Liskeard.</p> <p><u>E3[1]: Housing targets:</u> The NDP demonstrates general conformity with the housing targets in the Cornwall Local Plan; identifying a suitable amount of land, when taken together with the planning consent at Tencreek, in neighbouring Menheniot Parish, to meet the CLP target for Liskeard.</p> <p>E18: this is an objective, but not a policy – recommend removal</p> <p>C105[1] clarify wording to make clear where development can happen - at present could go anywhere</p> <p>D1[2]: see comments on H4. D2[8]: Support, but target should be expressed as a net figure and a minimum.</p> <p>D3[3]: support</p>	<p>which is derived from the best available demographic growth projections and a sustainable spatial strategy (CLP Policy 2) on which is based the role and function of places set out in CLP Policy 3. Existing permissions, windfall and allocations in the NDP are sufficient to meet this 'apportionment' and include a small surplus and a careful mechanism to release land to meet any under delivery of the 'apportionment'. It is therefore expected that the Local Planning Authority will resist any proposals for <i>additional</i> housing on the basis that they cannot be sustainable development within the terms of CLP Policies.</p> <p>E3[1]: Noted and welcomed.</p> <p>E18: Not accepted. Policy H1 is an essential context setting statement by local people that expresses the clear intention to deliver sustainable development, not restrict it. It also expresses the intention to achieve this through a sensible sustainable development strategy.</p> <p>C105[1]: Accepted. Further clarification is proposed.</p>	within the development boundary (Policy NP 1) will be supported.'

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			D1[2] See response at H4.	
Policy H2 - Brownfield Land First	E3[2] CX6[2], C8[1], C21, C24, C28[1] C29, C40, C43, C45, C46, C55, C57, C57 D2[9]	<p>E3[2] NDP is not able to insist on brownfield delivery first and Policy H2 should be removed.</p> <p>CX6[2], C8[1], C21, C24, C28[1] C29, C40, C43, C45, C46, C55, C57, Support. Good idea build on brown field and sites and empty buildings before greenfield sites, and gives the opportunity to enhance the present architecture and bring some vibrancy to our town centre.</p> <p>But will Cornwall Council Planners to support this? Note that Developers / builders need to have real incentives to use run-down brownfield sites</p> <p>C57 There is no recognition of the ecological supremacy of natural vegetative conditions un-altered by man.... Modern building techniques make it impossible for nature to redeem the land at any time in the future....Greenfield development should only be permitted where buildings are constructed from materials found on site....possibly with the addition of brought-in timber for the structural framework of the buildings...(precis of longer comment)</p>	<p>E3[2]: Not accepted for the reasons set out in the reasoned justification to the policy. This is now strengthened by the Govt's intentions to amend the NPPF as described in Paras 1.24 and 1.25 of 'Fixing Our Broken Housing Market':</p> <p><i>Bringing brownfield land back into use</i></p> <p><i>1.24 We must make as much use as possible of previously-developed ('brownfield') land for homes – so that this resource is put to productive use, to support the regeneration of our cities, towns and villages, to support economic growth and to limit the pressure on the countryside. The Government is already pursuing a number of reforms to make this happen, as set out in the annex.</i></p> <p><i>1.25 Going further, the presumption should be that brownfield land is suitable for housing unless there are clear and specific reasons to the contrary (such as high flood risk). To make this clear, we will amend the National Planning Policy Framework to indicate that great weight should</i></p>	<p>Amend H2 as follows: At line 5, following '....identified..' delete all and insert 'in Table 1 and smaller unidentified and windfall sites within the urban area (using the base date for measurement of 1st April 2016), and the conditions in policy H5 apply.'</p> <p>Reasoned Justification: 1st Column, Para 1, after NPPF quote ending '...environmental value' add rest of sentence: 'and LPA's should identify and bring back into residential use empty housing and buildings'.... In Paras 110 and 111 the NPPF says that Plans should allocate land with the least environmental or amenity value and that planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value, and that local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land.</p>

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		<p>D2[9]: Policy H2 is inconsistent with the NPPF, which seeks to 'encourage' rather than 'prioritise' the development of previously developed land as demonstrated in Para 14 of SoS decision at Burgess Farm, Salford (quoted). Also inconsistent with need to maintain 5 year housing land supply. Not clear if realistic assessment of the deliverability of the sites</p>	<p><i>be attached to the value of using suitable brownfield land within settlements for homes, following the broad support for this proposal in our consultation in December 2015.</i></p> <p>It is also noted that the current NPPF, in relation to conserving the natural environment, says that Plans 'should allocate land with the least environmental or amenity value (Para 110)....Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value. Local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land (Para 111)</p> <p>Community engagement at the start of the plan process indicated a strong desire to prioritise the use of urban brownfield sites, before greenfield sites were released. This support has continued through the R14 pre-submission consultation. Given the Govt's intentions It would be a betrayal of community faith in the</p>	<p>1st Column, between Para 1 and 2, add new paragraph as follows: ' The Government's February 2017 Housing White Paper "Fixing Our Broken Housing Market" refers on page P25 to bringing brownfield land back into use, to support economic growth and to limit the pressure on the countryside, and states in paragraph 1.25 'Going further, the presumption should be that brownfield land is suitable for housing unless there are clear and specific reasons to the contrary (such as flood risk). To make this clear we will amend the National Planning Policy Framework to indicate that great weight should be attached to the value of using suitable brownfield land within settlements for homes'.</p> <p>Add new Para 3: Community engagement at the start of the plan process indicated a strong desire to prioritise the use of urban brownfield sites, before greenfield sites were released. This support has continued through the R14 pre-submission consultation</p> <p>Page 41, Delete Table 1 and insert: 'During initial scoping of urban capacity, it was estimated that there was the</p>

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			<p>Liskeard NDP if the policy were now to be deleted.</p> <p>D2[9]: Clearly the national policy position on brownfield land is changing in favour of the NDP policy position. Furthermore, the quoted appeal case text appears to be at variance with the original text of Para 14. As the 5 year supply issue is measured at a Cornwall wide level the application of the argument at neighbourhood plan level is irrelevant.</p>	<p>potential for up to 130 new dwellings within the urban envelope, in addition to the allowance made for windfall under the Cornwall Local Plan criteria. This figure is discounted by 30% to allow for non-delivery, giving a total urban potential of 90, plus remaining windfall. As can be seen from the table below, approaching half of this number is already deliverable, with planning permission.</p> <p>Table 1 Deliverable urban capacity sites (with planning permission)</p> <table><tr><th>Site Ref</th><th>Address</th></tr><tr><td>HC15</td><td>Old Station Road, Moorswater</td></tr><tr><td>HC16</td><td>Old Station Road, Moorswater</td></tr><tr><td>HC17</td><td>Old Stag Inn, Station Road, Liskeard</td></tr><tr><td>HC22</td><td>Timberlee</td></tr><tr><td>HC23</td><td>Tenerife</td></tr><tr><td>HC26</td><td>Butchers Shop, Higher Lux Street</td></tr><tr><td>HC31</td><td>Rencliffe Cottage, Limes Lane</td></tr><tr><td>HC32</td><td>& Greenbank Lane</td></tr></table> <p>Table 1 above shows permissions granted on urban capacity sites</p>	Site Ref	Address	HC15	Old Station Road, Moorswater	HC16	Old Station Road, Moorswater	HC17	Old Stag Inn, Station Road, Liskeard	HC22	Timberlee	HC23	Tenerife	HC26	Butchers Shop, Higher Lux Street	HC31	Rencliffe Cottage, Limes Lane	HC32	& Greenbank Lane
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				(brownfield and infill), totalling 40 dwellings. Further information on the estimate of urban capacity can be found in the <u>'A Place to Live Working Group Report'</u>
Policy H3 - Employment and Housing Balance	B5[4], E19, D2[10]	B5[4]: Supports need for housing and employment balance. E19: as with policy EM1, this cross subsidy is not reasonably related to housing development. Recommend removal. D2[10] Repeats objection to policy EM1	B5[4], Support is welcomed. E19, D2[10] see comments on EM1.	Amend as per EM1: '.... all new larger housing schemes (30 or more dwellings) must contribute towards the need (as defined in the Cornwall Local Plan) for employment land, or servicing and development of such sites to facilitate the delivery of viable workplaces. ...' At the bottom of H3 – remove 'the release of employment land' replace with 'the release/development ...'
Policy H4 - Allocation to Meet Current Target	A1[2], C49, C77, E20, D2[11]	A1[2]: Policy should refer to a named plan showing the allocated sites and that each site is named on the plan. C49 C77: New houses should be located near the station All the trains stop here and its good for travel to work C86[2] If housing development at Addington extends up to new park it could that provide better access to the site for walking and cycling as well as vehicles? E20: this site has planning approval - not an allocation. Delete. D1[1 to 4 and 7]: Suggests that development Boundary should be extended to include land north of	A1[2]: Accepted. Unfortunately, the scale at which the maps were printed caused site details to be suppressed by the software. C49, C77, C86[2]: Not accepted, sites were prioritised using 12 sustainability factors and on balance the allocated site scored better. Future releases will be subject to H5. E20: Not accepted, the site is subject to a planning application but this has not yet been approved. D1[1 to 4 and 7], D2[21]: Not accepted, sufficient flexibility linked to the housing trajectory methodology used by CC is already built in to the NDP. Note that site at Addington has	Revise Proposals Maps and publish at an appropriate scale that allows for accurate interpretation and indexing of sites affected by NDP policies and suggestions.

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		<p>Persimmon site at Addington to encompass a site that previously had outline planning permission, as it 'would be prudent to allow flexibility in the Neighbourhood Plan for reserve sites to be brought forward when allocated sites are not delivering or have stalled and housing shortfalls are identified'. The current surplus of 9% is insufficient, and the allocation of the Addington as a 'reserve' would be more effective. The site is a logical extension and provides opportunity for links to the Roundberry Park and improved infrastructure contributions. It would meet the requirements of policy H5 (other than H5f). D2[11]: Supports allocation. D2[21] Proposes 17.6 ha allocation west of Coldstyle Road for mixed use development of 150 dwellings and 5ha of employment land, as a means of providing flexibility in meeting the housing requirement, which is a minimum figure, and to deliver employment land. Current surplus of 8% is too low and 20% should be allowed so that a 5-year housing land supply could still be maintained should sites not deliver at the rates anticipated. As such, the land at Coldstyle Road could be allocated, or</p>	<p>never benefitted from outline permission. D2[11]: Support noted.</p>	

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		in the alternative identified as a reserve site, to provide the plan with the necessary flexibility to respond to rapid change.		
POLICY H5 - Ensuring Housing Delivery to Meet the Target Up To 2030	E1[2], E21, D1[5], D2[12], D3[4]	<p>E1[1]: On page 43 the NDP refers to the Cornwall Structure Plan, in error. E21: The target of 1400 is not a maximum. This policy could be useful for controlling the quality of any further development, but specify whether all the criteria apply? D1(5) Policy H5 (f) on self-build. It is not workable or practicable to deliver the 5% serviced site provision during the operational phase of development. This requirement is likely to be realised in the final phase of construction, if feasible, and should be considered concurrently with the provision of affordable housing and policy H5 (g) on Community Land Trusts. These seek to deliver an alternative means of affordable housing (which can include self build) and as such should be considered as part of an affordable housing scheme or contribution concurrent with Policy H5(f).</p> <p>D2[12]: Support the intention, but the policy is faulty and confused, and an inappropriate tool. Correct approach is to apply presumption in favour of</p>	<p>E1[1]: Accepted, amend accordingly E21: Accepted, but note (1) that whilst the CLP Inspector required in his Report (Para 139) that the Cornwall target should be regarded as a minimum, he also stated that it was 'not necessary to similarly indicate that all the apportionments for each town and CNA residuals should be minimum figures'. This is the approach being taken by CC in the DPD.</p> <p>(2) CLP Para 1.74 to the effect that 'Where a five year supply can be demonstrated, the adequacy of supply in meeting the needs of a particular CNA or town over the whole Plan period will be a material consideration when making planning decisions. Any deficiency in supply should be accommodated within the CNA with a shortfall and not be compensated for by increasing supply in other CNA's where existing supply is sufficient to meet its Local Plan target.</p>	<p>Policy H5, line 5, after ...housing..' delete ..'would be allocated in accordance with...' and insert 'will be allowed in accordance with Policy H2 and..'</p> <p>Page 43, following Policy H5 box, delete 'Cornwall structure Plan', and insert 'Cornwall Local Plan (Adopted November 2016)'</p> <p>Amend title 'Ensuring Housing Apportionment Target up to 2030'</p> <p>Below Comment housing figures on Page 44 insert: 'In addition to the figures above, the development with planning permission at Tencreek, includes provision for later living/extra care for around 60 residents.'</p>

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		<p>sustainable development as per NPPF. The site priority method is not based on specific applications or mitigation and is an inadequate form of assessment. Requiring self-build and involvement of land trusts is contrary to Local Plan.</p> <p>D3[4] Support but concern over viability impacts of H5 b and g</p>	<p>(3) According to the Cambridge Dictionary a target is 'a level or situation that you intend to achieve', i.e. that is planned for.</p> <p>(4) CLP Para 1.75 that 'Working to deliver the targets provided by the network area and town figures is critical to supporting the strategy and spatial distribution, and ensuring the needs of all communities are met in a planned manner'.</p> <p>Seen in the context of these notes, the NDP does not claim the target to be a maximum, accepting it in H1 as the housing 'apportionment' to Liskeard and in H2, H4 and H5 creating a locally supported and sustainable strategy to ensure that the target can be reached, (including a small surplus and a careful mechanism to release land to meet any under delivery), in the spirit of CLP Para 1.75</p> <p>However, having responsibly planned to deliver the targeted apportionment in the NDP, the community of Liskeard might reasonably expect that the Local Planning Authority will resist any proposals for unjustified additional</p>	

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			<p>housing development beyond the current target.</p> <p>All the criteria apply.</p> <p>D2[12]: We are happy with our policy which is positively supports development in a controlled and non-arbitrary way</p> <p>D3[4]: Noted. It is expected that detailed examination at application stage will examine viability and determine the nature of the mix and the form of involvement of a CLT.</p>	
Housing Objective 6	E22	E22: "...in the likely possible absence of CIL...". While Cornwall Council could decide not to adopt a CIL, at this stage, this is not considered likely. The current timetable is for adoption is Autumn/winter 2017.	Accepted.	Objective 6. Para b), delete 'In the likely possible absence of Community Infrastructure Levy'
POLICY H6 Agricultural Dwellings and Specialist Need Dwellings	B9[3]	if this was in the Lodge Hill area, there needs to be a clear and safe access to the town centre on foot	Noted	
POLICY H7 Infrastructure	B9[2], C64, C67, C68, E23, D2[13], D3[5]	B9[2], C64, C67, C68: Continued residential development in the area should be balanced with the current and future development of facilities such as doctors, dentists, school sizes, poo bins, Church buildings, entertainment facilities etc.	<p>B9[2], C64, C67, C68: CLP Policy 28 and Liskeard NDP Policy H7 are intended to ensure that such provision is made. See also the Liskeard NDP Infrastructure Report.</p> <p>E23, D2[13]: Accepted. The policy intention is to ensure that as well as the standard items covered by S106</p>	Convert Policy H7 and associated text into explanative commentary following Objective 6, including specific reference to the relationship between Section 106 and the proposed CIL Regulation local preference List. Consequential amendments to Delivery Plan listing.

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		E23: this is covered by strategic policy, CLP Policy 28: Infrastructure (see general comments on developer contributions). D2[13]: Further clarification of how the policy links with the delivery plan is needed. D3[5]: Policy H7, Policy OSL5, Policy OSL6 & Policy OSL11A refer to contributions which should fall within the CIL Regulations and should be formatted in the plan rather than seeking 106 contributions from individual developments.	and CIL Regulation 123 'Strategic' level listing, the 'Neighbourhood' level items are also captured, and linked to the Delivery Plan set out at Page 84. The policy also served to provide essential contextual material reassuring the community that any infrastructure impacts of development would be addressed. Amendment proposed.	
POLICY H8 Redressing the Imbalance in Housing Tenure, Size and Mix	B5[5], B8[3], C18[3], C58, C61, C105[2], C28[2], C82, E24[1], E24[2], D2[14]	B5[5]: Support – May redress impact of recent new build which has been mostly high density and very urban in feel rather than that of a rural market town. C18[3], C58, B8[3] Quality housing for all - the young, the infirm, the vulnerable and the elderly. C61 More affordable housing, C82 Sheltered housing needed. C105[2], C28[2]: Promote housing for the elderly E24[1] this is covered by strategic policy (CLP Policy 6: Housing Mix) If you have evidence of specific local needs then it would be useful to add this – if not, delete to avoid repetition. E24[2]: c and d. A condition should be applied to all domestic property	B5[5], B8[3], C18[3], C58, C61, C105[2], C28[2], C82: Whilst continuing provision of smaller and specialist dwellings is essential, the need is also to balance the mix of dwelling types and tenures to ensure that a well-balanced and prosperous community is supported. E24[1]: Not accepted, the Policy supplements CLP Policy by indicating more specifically the mix of homes that are required, based on evidence in the 'A Place to Live' Report, summarised in the text following the policy. It also applies to developments below the threshold of 10 units set in CLP Policy 6. See also CLP section of	Amend policy to refer to market demand as a factor by adding at end of Policy H8: 'Proposals must show how they assist in rebalancing the housing stock and meet market demands.'

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		development to include the requirement for a domestic sprinkler system. The need increases for those housing types mentioned in points c and d as these house the most vulnerable members of society. D2[14]: Supports concept of providing for a mix of dwellings, but contends that there is reference within the policy to meeting market demand, as this is just as important as reverting any perceived imbalance back towards Cornwall or national averages.	Lisleard-Looe CNA for additional support. (PP15) E24[2]; Not accepted, although a good idea, fire precautions are not a planning matter that can be dealt with in a Neighbourhood Plan. D2[14]: Accepted.	
POLICY H9 Supporting the Town Centre	C4[2]	B5[6]: Units suitable for small households need to have enough living space within them to enhance the lives of their occupants. C4[2]: Mixed use developments near to town centre should be encouraged to attract knowledge based businesses that would bring better wages and skills to the area, and add vibrancy.	B5[6]. Noted. CLP Policy 13 applies the national space standard guidance contained in the 'Technical housing standards – nationally described space standard' (March 2015) so the issue does not need to be covered in the Liskeard NDP. C4[2]. The policy as written is sufficient, however the Comment could usefully be added to about knowledge based industries.	Amend 2 nd Paragraph of comment to H9 to read: 'In mixed use developments, where knowledge-based and professional home enterprise businesses may cluster....'
OBJECTIVE 9, POLICY H10 - General Design Principles	A3, C69, C74 C105[3], E25, D2[15]	A3 Support the references to Designing out Crime, and proposes wording to include anti-social behaviour. C69, C74 Parking charges too high and many workers park in housing areas - should be directed to suitable car parks so home-owners can park	A3: Accepted C69, C74: Not accepted, Parking charges and controls are not a planning matter and cannot be controlled through a Neighbourhood Plan. C105[3]: Accepted, H10a is insufficiently clear that it is not intended to encourage detailed copying. E25: Accepted in principle,	Revise Objective 9 to read as follows: "Encouraging compatibility of design with surroundings, making the best use of landscape, landscaping and providing safe and convenient access for pedestrians etc. and designing against crime, disorder and anti-social behaviour".

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		<p>C105[3] H10 (a) should not base design standards on what is there already, but should make sure bad design is not perpetuated by copying it.</p> <p>E25: repeats strategic policy (CLP Policy 12: Design) and does not add any local detail; delete to avoid repetition. D2[15]: Support</p>	<p>but it is considered that CLP Policy 12 does not cover all the local issues identified in the Liskeard NDP. Amendment proposed.</p>	<p>Revise H10 as follows:</p> <p>‘New residential development must comply with Cornwall Local Plan Policy 12 and:</p> <ul style="list-style-type: none"> a. Respond to and where possible provide remediation of existing environmental or design issues that are detrimental b. ‘incorporate design features that enhance prevention of crime, anti-social behaviour and disorder and provide a secure environment’ c. Demonstrate high standards of sustainable design as set out in Policy SUS1 <p>Amend reasoned justification as follows: <i>Every new development, of whatever scale, has a potentially significant effect on the appearance and character of an area, and impacts on local functionality, quality and sustainability. Cornwall Local Plan Policy 12 provides guidance on design expectations generally across Cornwall. In Liskeard, there are issues with areas of poor design or sensitivity, and perceived crime and disorder problems. It is also important to link design to sustainability issues.</i></p>

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A Place to Meet and Shop and Do Business 48 – 61	A2[1], B5[7], C7[3], C51, C65[2], C80, C88, C97[2], C97[3], E26	A2[1]: An understanding of local heritage values and issues has informed the extensive range of locally specific policies and projects for the preservation and enhancement of the heritage of the area (Objective 3, p56 - 62). B5[7], C7[3], C51, C65[2], C80, C88, C97[2], C97[3]: Mix of shops is unbalanced, and currently many empty premises Wider offer with more known brands, restaurants, deli's, cinema, evening activity, needed. Cultural and historic heritage of Liskeard should be used as branding. Shopping centre needs to be user friendly for those who need to access from Liskeard's hinterland. E26: What role can the railway station and play in supporting the town as a destination for visitors and shoppers. Is there any opportunity to improve connections to the town centre for pedestrians and cyclists?	A2[1] Noted. B5[7], C7[3], C51, C65[2], C80, C88, C97[2], C97[3]: The NDP recognises that the town centre 'offer' and mix needs to be improved, and these are key intentions within the aims and strategic approach adopted (see Page 49), and the policies that follow. E26: This is recognised in Policy OSL4 and OSL 11A but could be more explicit. Amendments proposed.	Objective 4: add additional point and renumber: 'Improve connections to the town centre for pedestrians and cyclists' Consequential amendments to OSL 4 and 11A
Policy TC1 - New Large Scale Retail Development	B2, C11[3], C71, E27[1], E27[2]	B2: There are no plans in RM strategy to relocate the Liskeard DO, unless an alternative suitable site could be found at no cost to the business. Reference to redevelopment on Royal Mails property should be removed from the Neighbourhood Plan. C11[3]: Family friendly pub needed in town	B2 Noted. The retail development requirement referred to in Policy 4 and Table 2 of the Adopted Cornwall Local Plan 2016 can be met on other sites identified in the NDP (Sungirt and Cattle Market). Amendment proposed. C11[3]: Wetherspoons development should fulfil this need.	Delete reference to RM Sorting Office in TC1 and make consequential adjustments to Proposals Map and town centre inset, to be produced at more legible scale.

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		centre. C71: Parking isn't expensive & there are plenty of legitimate spaces within easy walking distance. E27[1]: needs a detailed/ large scale map to identify sites. E27[2]: Repeats some elements of strategic Policy. Clearer to delete these elements, and give emphasis to specific local requirements	E27[1]: Accepted. E27[2]: Accepted but prefer to retain policy as it stands for completeness.	
POLICY TC2 - Impact Assessment of Retail Developments	E28, D2[16]	E28: The NDP says the default threshold for retail impact assessments is 2,500sqm. What is the evidence and justification for setting such a low threshold? D2[16]: Agree that in Liskeard a lower threshold could be justified, but it is not clear how such a significantly lower requirement complies with paragraph 2b-016 of the PPG, which sets out the considerations for establishing a local threshold. proposed threshold for impact assessments of 200m2 is too low. T	<p>E28, D2[16]:NPPF 26 says that '...planning authorities should require an impact assessment if the development is over a proportionate, locally set threshold..' NPPG 2b-016 describes the criteria to be used in setting a lower threshold. These are:</p> <ul style="list-style-type: none"> • scale of proposals relative to town centres • the existing viability and vitality of town centres • cumulative effects of recent developments • whether local town centres are vulnerable • likely effects of development on any town centre strategy • impact on any other planned investment <p>In effect the 'A Place to Meet Shop and do Business' report assesses these factors and justifies the lower figure, as</p>	Add at end of Comment on Page 51: 'It is anticipated that Cornwall Council will set a local threshold. Until Cornwall's threshold for retail impact assessments is established, impact assessments will continue to be required under the terms of Policy TC2.

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			<p>is summarised in the reasoned justification. A threshold of 200sqM was set in the Caradon Local Plan in and has been effectively used consistently, including recent appeals.</p> <p>Looking forward, CLP p29 para1.78 says'...If required, a threshold for retail impact testing will be identified for Cornwall's main towns in the Allocations Development Plan Document....' Since the Allocations DPD will not be applied to Liskeard, the NDP should establish a threshold, (in anticipation of any threshold determined by Cornwall).</p>	
POLICY TC3 - Development in the Town Centre Generally	B8[2], B6[4], B8[5],	<p>B8[2], B6[4] C98 Wetherspoons permission should be built to provide a popular facility for young people. A local market would add life.</p> <p>B8[5]. 'Pop up' shops had been popular, could this idea be reinstated?</p>	<p>B8[2], B6[4], C98 It is understood that Wetherspoons still intend to provide one of their pub/restaurants in Liskeard Town Centre. Policy TC4 on the Cattle Market suggests that space be available that would provide an opportunity for a local market to be held.</p> <p>B8[5]' Pop-up shops' usually occupy vacant retail space or share underutilised space in occupied premises, for a temporary period. They do not usually require planning permission, so are beyond the control of the Neighbourhood Plan. However, they add to the 'offer' of town centres, support existing retailers,</p>	<p>Page 54 add the following to comment: 'TC3. 'Pop-up shops', which are temporary retail spaces used by one or multiple brands to test new concepts, formats and markets in an innovative and original way without heavy investment, would not normally require planning permission and are encouraged as they add to the 'offer' of the town centre, support the existing retailers, and enhance viability and vitality.'</p>

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			allow for brand combinations that enhance viability, and provide opportunities for the town centre to be tested as a venue for new products.	
POLICY TC4 Liskeard Cattle Market	C2, C6[3], C7[2], C7[4], C9, C11[2], C14, C17, C37, C62, C87, C92, E29	<p>C2, C6[3], C11[2], C14, C87, C9, C92: Plans look good, should include community uses, small supermarket to attract people into the town centre and later living apartments. C7[2]: A Cornwall College department would attract students spending and reduce travel. C7[4]: Would a further food store be viable? Better to encourage small specialist retailers. C9: Move the market to an edge of town site to save mixing animals with a modern town centre.</p> <p>C42, C62, C67: Object – Loss of cattle market will destroy role and character of Liskeard and impact on agricultural small holdings. Covered in market should be provided.</p> <p>E29: specify whether all the criteria must be met. Include a large-scale map of the site.</p>	<p>C2, C6[3], C11[2], C14, C87, C9, C92: Support noted and welcomed. C7[4]: Retail studies suggest that viability will not be a problem. Some small units could be included as well. C42, C62, C67: The NDP does not propose the closure of the Market. However, as noted in the comment on Page 54, it is though that the Market will close for economic and operational reasons in the lifetime of the NDP and so it is appropriate to plan for the beneficial reuse of the site.</p> <p>E29: Accepted. Preferred options are also emerging from the current studies. Amendment proposed to make it clear which criteria must be met and which are optional.</p>	<p>Proposals for the regeneration of the cattle market must:</p> <ol style="list-style-type: none"> 1. Be of a scale and character appropriate to Liskeard and reflect the sense of place and the character associated with the site; and 2. Maintain and improve the permeability of pedestrian routes through/across the site which: <ol style="list-style-type: none"> a. Link to and from the main shopping area of the town b. Connect to Dean Street and Barras St/Windsor Place via Market Approach c. Retain connectivity to the existing Liskerrett Centre d. Provide a new pedestrian link to the rear of Rosedean House Surgery e. Improve access for vehicles and

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				<p>pedestrians along Fairpark Road,</p> <p>f. Maintain access to adjacent properties, and</p> <p>3. Retain sufficient parking to contribute to the needs of the town centre and meet the requirements of the proposed development, and</p> <p>4. Provide superfast fibre connections, or ducting to facilitate such connections.</p> <p>Development options which will be supported may include:</p> <p>a) A new medium sized foodstore of approximately 20,000sq ft, (whilst retaining and enhancing the existing retail units);</p> <p>b) A flexible space that could include café/restaurant (Class A3 & A4), office and 'pop-up' uses;</p> <p>c) A new civic square and flexible pannier market for social gathering and market trading with a high quality public realm including places to sit and play;</p> <p>d) A proportionate scale of housing development to help enable the development and</p>

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				<p>add vitality and presence to the town centre;</p> <p>e) A mixed-use community centre including multi-functional hall for performance/exhibition/leisure and conference uses;</p> <p>f) Office space (Class A1 and B1).</p>
POLICY TC5 - Development in The Town Centre Primary Shopping Area and Upper Floors in Primary Retail Frontage	B9[5]	More should be done to encourage local traders to be a focal part of the town.	That is one of the purposes of the NDP	
POLICY TC6 - Development in the Primary Retail Frontages	E30	E30: this is more permissive than strategic policy CLP Policy4: shopping services and community facilities which requires the change of use from A1 to A2-5 also to demonstrate that the proposed use 'would not undermine the retail function of the town centre and maintain and enhance its vitality and viability.' Is it your intention to be more permissive in this way?	E30: Accepted, but it is the intention to be more relaxed, since CLP Policy 4 could restrict flexibility in the regeneration of the town centre.	
POLICY TC7 - Liskeard Town Centre Integrated Wi-Fi & Web Presence Strategy	C4[1], E31	C4[1]: Support. Shops and services in town centre should have websites and club together to install a town wide WiFi. If necessary contributions could come from new developments through S106.	C4[1]: Support noted. E31: Accepted. However, From 2017 EU Legislation will specify that new build and major renovations of buildings will need to be high speed ready, whilst the focus of the National Planning Policy	<p>Retitle policy to 'Liskeard Town Centre Broadband and WiFi'</p> <p>Delete policy and replace with:</p>

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		E31: this could be a project or an objective, but is not reasonable as a policy – not clearly related to development. Recommend deletion.	Framework states that ‘in preparing Local Plans, local planning authorities should support the expansion of electronic communications networks...’(Para 43). Planning authorities around the country are successfully including planning policies supporting such networks. Bearing this in mind and in the context of Liskeard’s urgent need to modernise its town centre ‘offer’, it is considered that a policy requiring the provision of Broadband and Wi-Fi is justified. Amendment proposed.	<p>‘New retail, service, business and live-work accommodation (whether provided though new development or conversion) located within Liskeard Town Centre (as shown on the Proposals Map Inset) shall be provided with a superfast fibre connection, or ducting to facilitate such connection when it becomes available.</p> <p>Revise comment in 2nd Column of Page 54: <i>‘Retail change over the next decade will be technology driven, largely focusing around the use of IT, WiFI and 4G in which mobile, online and in-store experiences complement rather than compete with one another. Therefore provision of broadband infrastructure within premises in the town centre is vital to facilitate the provision of a public WiFi service under Project TC5, essential if the town centre offer is to keep up with its rivals, enhancing vitality and viability, and attracting additional investment.’</i></p> <p>On page 55, Projct TC5, delete supporting text, replace with:</p> <p>To support the creation of a public WiFi service and enhanced web presence to assist the town centre offer to keep up with its rivals giving the opportunity to</p>

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				<p>generate revenue, attract more visitors, keep visitors for longer periods, and keep a competitive edge through the 'near me' and SEO services in Google and Bing, which can point customers to local businesses, providing they have a website. High street WiFi is not simply a 'service' to town centre visitors: some 80% of searches on smartphones are for local businesses, and 78% of these turn into local offline purchases. Mobile phone service operators are increasingly looking to 'offload' data demand to keep their service speeds up to scratch, so are also looking to invest.</p> <p>Delivery Plan, Include Include BB neighbourhood provision in Reg 123 lists as infrastructure that is "required to support the development of its area"</p>
POLICY TC8 - Design of New Development in The	B9[6], C7[5],	B9[6], Liskeard is not a very attractive place for people passing through to stop and look around - there are		

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Town Centre and Liskeard Conservation Area	C83[1], C101	several empty sites and many unsightly ones. C7[5], C83[1] Strong support C101 Also good to see protection of our heritage and landscape assets around the edge of the town as well as buildings in the centre.		
POLICY TC9 - Shopfront and Other Commercial Signage in The Town Centre and Liskeard Conservation Area	C7[5], C83[2]	C7[5], C83[2] Strong support		
POLICY TC10 - Shop Fronts in The Town Centre and Liskeard Conservation Area	No comments received			
POLICY TC11 - Local Listing of Buildings of Significance in The Town Centre and Liskeard Conservation Area.	E32[1], E32[2]	E32: Refer to locally listed buildings as 'non-designated heritage assets' Identify them more clearly on a larger scale map. This is not a policy.	E32[1] Accepted. Amendment proposed. E32[2]: Heritage England guidance indicates that a local heritage list may be produced as Supplementary Planning Document (SPD), and that Local Plans can then include policy on locally local listings. (Historic England advice note 7: Local Heritage Listing May 2016 p6, para 17 and 18). It is also stated that '...work in preparing a Neighbourhood Plan may indicate buildings and sites which merit inclusion on the local list'. We see no reason why local listing should not be done through an NDP instead of SPD.	Change title to 'Local listing of non-designated heritage assets...' Reword policy as follows: 'The following buildings and grounds are locally listed as being of architectural significance, local distinctiveness and character and historic importance: a) St Malo, Varley Lane b) Hollywood, Russell Street Proposals impacting on these buildings and grounds will be considered under CLP Policy 24 'Historic environment'. From time to time additional sites may be locally listed, in which case NDP Policy

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			However, for the sake of clarity amendments are proposed.	TC11 and CLP Policy 24 will apply to them. Add into justification on Page 58: ‘..work in preparing a Neighbourhood Plan may indicate buildings and sites which merit inclusion on the local list. Historic England advice note 7: Local Heritage Listing May 2016 p6.
POLICY TC12 - Retention and Enhancement of Heritage Assets	C48, E33	C48: Support, E33: repeats strategic policy (CLP Policy 24: historic environment).	C48, support welcomed. E33: Accepted. Amendment proposed.	Remove ‘POLICY TC12’ and reference to it in the reasoned justification. Insert in box: <i>Retention and Enhancement of Heritage Assets</i> <i>Cornwall Local Plan Policy 12 says that Proposals for development should protect, conserve and enhance the significance of designated and non-designated assets and their settings including the character and appearance of Conservation Areas, historic landscapes and townscapes, and the industrial mining heritage. Proposals which affect or involve heritage assets must be accompanied by an assessment of the significance of the asset and the impact of the proposal upon its significance and identifying mitigating measures to be incorporated into the development as necessary. For Liskeard, heritage assets are statutorily listed and</i>

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				<i>locally listed buildings, unlisted buildings designed by noted local architects and builders or related to the Cornwall and Devon mining Landscape World Heritage site.</i>
POLICY TC13 - Maintenance and Improvement of Buildings and Public Realm in The Town Centre	E34	E34: Some of the proposed works will not require planning permission, the design principles could be better related to policy H10.	E34: Accepted, but many will come under planning control or need listed building consent, or advertisement consent, when associated with a development. They will also be relevant to work not requiring formal permission or consent, which is recognised in the comment following the policy. It is practical to cover all these eventualities in one place.	
A Place to Relax and Enjoy 62 - 79	C1, C7[6], E35	C1: questions the adequacy of a range of facilities. C7[6] strong support E35 Supportive of the policy approach in particular the focus on provision of walking and cycling and public transport links and improvements	(C1) The Plan seeks to provide planning policies that will address such inadequacies.	
POLICY OSL1 - Green Spaces	C10[1], C38[1], C99	C10[1], C38[1], C99: Support. E36: put the numbers on the map. Page64 lists & numbers green spaces, but there is no annotation on the map on page 94.	E36: Accepted. Unfortunately, the scale at which the maps were printed caused site details to be suppressed by the software. A larger scale Proposals Map with detailed insets is necessary.	Amend title to read: Policy OSL1. Prepare a larger scale Proposals Map with detailed insets. Amend first para of reasoned justification to read: 'These areas are of particular importance to the local community and fulfil the requirements of the NPPF <i>for Local</i>

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				<p><i>Green Space designation in that each green space...'</i></p> <p><i>Add new paragraph following: A full up to date robust assessment of open spaces in Liskeard was carried out in 2015 using the Green Flag assessment procedure (available here http://bit.ly/2nwg7sk).</i></p> <p>Change number code for Roundbury park to OSL6 for consistency to be the same number as the policy - will also need to be changed on p70 throughout the table where it is called OSL9</p>
POLICY OSL2 - Conservation, Enhancement and Creation of Local Green Spaces and Other Parks and Green Spaces to Accommodate Growth	C10[2], C72, C73, C38[2], A1[3], A1[4],	C10[2], C72, C73, C38[2]: Support A1[3]: The policy should make specific reference to need to conserve & where possible enhance areas designated as Ancient Woodland and Priority Habitat deciduous woodland, with a referencing plan. A1[4]: The policy should make specific reference to Local Wildlife Sites for the conservation and enhancement of biodiversity / ecological assets, and shown on a plan.	C10[2], C72, C73, C38[2]: support welcomed. A1[3], A1[4]: Accepted	<p>Show High Wood and New Plantation Ancient Woodlands, and Priority Habitat Deciduous Woodland Areas on a separate inset from the Proposals Map covering Policy OSL 2 (See Figure A below). Include 'Open space, Biodiversity and Heritage Show Halbathick Wood and Keasts Park Wood County Wildlife Sites on the OSL2 Proposals Map Inset (See Figure Below). Show biodiversity corridors (as in infrastructure report), Cherished Views and Ducal Deer Park on map.</p> <p>f) change to 'Conserving and enhancing biodiversity....' Replace 'vegetation' with</p>

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				'ancient woodland, priority habitat deciduous woodland...' at end of c): '..landscapes' change to 'both into and out of the town.'
POLICY OSL3 - Play provision in neighbourhood areas	C94, D2[17], E37[3]	C94: What is happening to the closed play areas - Henfordh Grange; St Martins court? 2 or more bedroom condition increases complexity of enforcement D2[17]: Support but note table is based on dwellings rather than numbers of residents, Unlikely that LAP will be required where less than 10 dwellings, or LEAP where less than 30. E37[1]: : Various comments on suitability of sites and nature of 'natural play facilities'. E37[2]: 2 or more bedroom condition increases complexity of enforcement. E37[3]: The Appendix [e] referred to in the table of Local Open Space Standards is missing. E38: The tables (bottom p65 & 66) - generic Fit standards do not accord with Policy 12.3 of the Local Plan.	C94: Discussions are taking place with the responsible authority to resolve these issues. D2[17]: Noted. Amendment proposed (see E38 below). E37[1]: These are complex issues on which there currently differing interpretations that will require discussion, and an update of the CC Strategy is due. Pending these discussions, it is appropriate that the policy remains as it stands (apart from amendment mentioned below). E37[2]: Accepted and amendment proposed. E37[3]: Accept that appendix is missing. Note that words 'standard calculations' are spurious. E38: Accepted. Deletion of tables proposed.	OSL3 - Remove final sentence of 2 nd Paragraph. Table of Quantity Benchmark Guidelines – Delete Table of Open Space Standards – Final paragraph – delete words 'standard calculations' At end of section, Insert Appendix E (see page XX below). Table of Minimum Play Sizes - Delete
POLICY OSL4 - Public Realm Access and Circulation Improvements	C10[3], C33, C70, E39	C10[3] Support - 1. Create a circular pedestrian and cycle friendly (i.e. off road) around Liskeard with spokes coming into Town Centre. 2. Venslooe Hill currently heavily used by	C10[3], C33, C70: Support noted. E39: Not accepted. If retained Policy LISK5 is a policy so is this. Amendments proposed to ensure is seen as a policy.	Change title to: 'Locations for enhanced public realm access and environmental improvements' 1 st Paragraph: Insert after '..implemented': 'Contributions will be

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		pedestrians, cyclists and horse riders and needs to be retained as a quiet lane. This is the only quick route into the countryside from the town centre. C25, C70 frequent hopper bus service (to and from the station) is needed. C33 Cycle racks at top of Baytree Hill area E39: This is a Project and not a Policy.		sought towards works from development in the town as all development directly affects the town's public realm'. Clause b), after Lisk 5 insert 'see Caradon Local Plan First Alteration 2007 Add new Clause e) 'Pedestrian links leading to and from the Station from the Town Centre.' Reasoned justification at beginning, insert; Land use planning has a key role in delivering the Connecting Cornwall Transport strategy. By shaping the pattern of development and influencing the location, scale, density, design and mix of land uses, planning can help to reduce the need to travel, reduce the length of journeys and make it safer and easier for people to access jobs, shopping, leisure facilities and services by public transport, walking, and cycling. The way we design and use public spaces also helps tackle climate change and health and well-being.'
POLICY OSL5 - Open Space and Developer Contributions Developers of Housing	B3, B4, D2[18],E40	Support for bringing forward additional pitches for Cricket, Football and Rugby, (plus facilities for Tennis, and Hockey). D2[18]: To meet CIL regs, policy should say that contributions will be sought to extend or improve existing facilities as a direct result of proposed development, and not be	B3, B4, Noted and support welcomed. D2[18]: Noted, but it is not though necessary to add this detail. E40: Noted. It is the intention of the Town Council to take a greater role in such matters, and may where necessary and appropriate take on such	Amend clause last paragraph of Policy OSL5 to replace 'will' with 'may'.
Reasoned Justification	E41			
Comment	E42			

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		sought towards maintenance. Timing of provision is a matter for S106 agreements. E40: OSL5 para2 would require the town council to be written in as a party to the s106, which although is not without precedent could create significant issues. E41: Uses out of date figures. The CC OS Strategy requires 44sqm/person and will be refreshed shortly.	obligations. E41: Accept new figures which are now available. E42:	
POLICY OSL6 - Meeting the Communities Need for Sports and Leisure	B2[1] B3, B4 C3[2] B9[4], C86[1] C97[1]	Particularly pleased to see reference in the supporting text to inclusion of a 'running track' as part of the facilities which may be provided at Roundbury Park. Support for bringing forward additional pitches for Cricket, Football and Rugby, (plus facilities for Tennis, and Hockey). Open spaces a town needs parks somewhere to walk and for picnicking, large area of land set aside for recreational use is an excellent idea Support	Noted and support welcomed.	
POLICY OSL7 - Provision of Orchards and Allotments	C10[5], C95 D3[6], E42	C10[5] As modern houses all seem to be now built without gardens, the need for many more allotments is crucial. Community orchards and /or forest gardens should be a mandatory part of any new developments. C95, C104 Support. D3[6]: Following the planning approval for affordable	C10[5]: Cannot be mandatory, but can be negotiated as part of a developer contribution where it justified. D3[6]: Not accepted, the location has been subject to consider able development recently and now needs green space to be provided.	First line: replace 'conserve' with 'protect': after 'developer contributions' add: 'on or offsite at Maudlin farm, Woodgate Rd, Culverland Rd, Charter Way, Tencreek and Addington' Change 'small' to 'smaller' and 'less than 5' to '11 or more' to be compliant

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		housing and open market on part of the land at Woodgate Road we believe that the remainder of the land is better utilised for housing rather than orchards or allotments. E42: What is the developer required to do? Is it provision of land within schemes, or contributions? Not clear and contributions are strategic and pooling will affect ability to provide. (see also comments from Open Spaces team) P72 – Comment – para1 – this does not accord with government rules imposed on s106, whereby only developments in urban areas of 11 & more can be required to make off-site contributions. It is my understanding that substituting this to a planning condition would not be permissible.		Change figure to 43 sq M
POLICY OSL8 - Routes and Settings of Caradon Trail, Liskeard Caradon Railway World Heritage Site and Looe Valley Cycle Trail	C10[6], C59{1}, E43	C10[6], C59{1}: Support - An off-road moor to shore cycle and pedestrian route (Looe to Minions) would provide essential amenities, and attract visitors to the town. E43: Can the corridors be protected as green space? The map does not appear to show all the trails listed and it is not clear whether all these areas are within the NDP area.	C10[6], C59{1}: support noted. E43: Accepted. Amendment proposed.	After: 'settings of the...' –insert: 'designated Caradon Trail (green corridor)..'. in the text. Amend footpath/cycleway/trail map to indicate Liskeard-Looe Valley Trail. Use separate colour-code/key for small sections outside NDP boundary. Add new policy for designation of Quiet Lanes IN POLICY 11B
POLICY OSL9 - Dark Sky	C10[4], C103, E44	C10[4] C103: Dark skies very important, Liskeard already over illuminated by sports pitches. New	C10[4] C103: Support noted. E44: Streetlights are provided under planning and S278 and 38 agreements	

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		leisure facilities have downward facing flood lights and existing ones changed. E44: Streetlights don't require planning permission. Could this be included in design policy?	that are implementations of highway proposals agreed through planning policy so it is entirely appropriate to include this here and seek to steer highways development management with an awareness of their impact on skyglow	
POLICY OSL10 - Area of Local Landscape and Heritage Value	C5[2], C39, C96, C106, C107, D2[19], E45	C5[2] Particularly like policies protecting the hinterland as a leisure area. C39 justification needs strengthening by including the most up-to-date Cornwall Historic Environment data (Caradon Hill Area Heritage Project mapping showing e.g. medieval farming landscape/fields, ducal deer park and numerous buildings / structures with medieval origin), and community engagement event where the Working Group's study of the area was open to public scrutiny and received support as an area of local significance. C96, C107 Need to indicate publicly accessible view-points/cherished views/landscapes that are valued in the locality. C106: Support. D2[19]: Object. Proposed landscape designation is not justified by the evidence base, and would impose an unreasonable constraint to the future development of a key settlement in the Cornwall Local Plan.	C5[2]: Support noted. C39, C96, C106, C107: Agreed. D2[19]: Not accepted, the designation is made because of the value of the site in landscape and heritage terms, and not as a means of preventing sustainable development. Recent data indicates that the significance and importance of the area is in fact greater than originally perceived. Paragraph 2.146 in preamble to policy 22 of the CLP indicates intention to review AGLVs. C96, C107: Accepted. Amendment proposed.	Justification needs strengthening to include most up-to-date Cornwall H E data – CHAHP project mapping and reference OS WG study and community engagement on area of local significance - include Heritage mapping info Publically accessible viewpoints / cherished views need showing on map Change: 'Within this area, any development which is permitted should recognize...' Indicate cherished view locations on Proposals Map with appropriate notation. Insert new policy OSL XX: ' Cherished Views . Any development proposals affecting the Cherished Views set out in this document must demonstrate the impact on the Cherished View by providing an analysis through an accurate visual representational assessment and statement*. Such statements must

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		<p>Therefore it would not be appropriate having regard to national policy (NPPF, 14, 16, 47, 156, 159, 184), basic condition 8(2)(a). The policy seeks to frustrate the achievement of sustainable development, contrary to basic condition 8(2)(d). The policy would also not be in conformity (general or otherwise) with any strategic policies in the development plan, contrary to basic condition 8(2)(e).</p> <p>E45: reference to permitted development is confusing</p>		<p>set out a description of the Cherished View and describe the nature of the impact or harm to the View from the proposals, taking into account the cumulative impact on the view from any existing unimplemented development proposals identify any mitigating measures to be incorporated into the development as necessary.</p> <p>*These will normally be set out in the Design and Access Statement or Environmental Statement accompanying a planning application. Each should consider the impact of the view taking into account the foreground, middle ground and background impacts</p> <p>Reasoned Justification. The existence of particular and familiar views adds to peoples' enjoyment of places, their sense of place and local distinctiveness, and even their sense of belonging to a particular place and community. Such views can become cherished because of the presence of distinctive buildings in the townscape and landscape, or because they frame the setting for people's everyday existence within their community and family life, having value as the place where their life experiences occur and giving a sense of permanence</p>

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				<p>and continuity. They may underpin local diversity and character, or project national identity in a locally relevant way. This 'attachment to the ordinary landscape' has important implications for psychological and thereby to social well-being and is an essential element in sustainable development.</p> <p>Comment: The 'Place to Relax and Enjoy' Working Group has examined the landscape and townscape of Liskeard and through its workshop meetings have identified cherished views for Liskeard.</p>
POLICY OSL11A - Pedestrian, Equestrian and Cycle Links and Corridors Project 3	B2[2], B5[9], B8[4], C5[1], C7[7], C8[2], C26, C47, C50, C59[2], C75, C76, C100, C102, E46	<p>B2[2], B8[4] Plan should recognise that pedestrian, equestrian and cycle routes provide opportunities for joggers, runners and others wanting to improve their fitness. with exercise equipment placed at intervals for residents to use at any time of the day or evening. Existing footpaths, cycleways could be readily adapted and new ones designed into future developments.</p> <p>B5[9] Proposed Quiet Lanes either end abruptly in narrow unpaved roads well used by vehicles or include main roads like the A390</p> <p>C5[1] Idea of planting tree-lined boulevards along some streets sounds</p>	<p>B2[2] & B8[4] Accepted</p> <p>B5[9] Only the routes within the Designated Area of the NDP can be shown, so it appears some end abruptly. However, it is appropriate to show the continuation of quiet lanes and other proposed routes where they extend beyond the Designated Area. Also, there is a mapping error showing a quiet lane on the busy road. C5[1], C7[7], C8[2], C26, C47, C50, C59[2], C75, C76, C100, C102, E46: Support and suggestions/ideas welcomed.</p>	<p>Add following sentence to Comment: 'Opportunities to provide 'fitness trails' with exercise equipment suitable for unsupervised use at appropriate intervals should be considered.'</p> <p>Add to listing in Project 3 on Page 77: 'g) 'fitness trails' with exercise equipment suitable for unsupervised use at appropriate intervals'</p> <p>Show the continuation of routes outside the Designated Area as 'Suggested Routes outside the Designated Area'. Remove mapping error.</p>

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		<p>wonderful - visually attractive on approach to town and great for wildlife and environment. Support quiet lanes concept. E46: not clear on map – not all listed</p> <p>C7[7] Strongly support - Encourage the negotiation of PERMISSIVE ROUTES for walkers, cyclists and horse riders C8[2] Agree with linking all outlying areas of housing with the centre of the town via safe cycleways and walkways</p> <p>Crossing end Gypsy Lane to Limes C26 Lane should be a footbridge. C47, C66 Proposed crossings of New Rd must be uplifted from proposed and actually built C50 Charter Way Road: Extend the pavement from Peppers Park entrance to Morrisons, the bubble, Premier Inn and proposed Tencreek development etc. Liskeard people need encouragement to get fit! Walking exercise is key.</p> <p>C75 Cycle way through Sungirt</p> <p>C76 Needs somebody to tell home owners to keep their vegetation off public footways - some are becoming impassable. C100 Footpath needed on Charter Way, safe path from Liskerrett area to Morrisons C102 Support and cycle-friendly round-Liskeard trail -</p>		

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		with connections into the town centre, extending to Minions and Looe		
POLICY OSL11B - Protection of Pedestrian, Equestrian and Cycle Links and Corridors	C7[8]	C7[8] Strongly support	C7[8]: support welcomed.	End of policy, in reference to policy OSL8:'further protect trail routes by seeking Quiet Lane status'
POLICY OSL12 - Protection of Existing Cultural, Community, Arts, Recreational and Sports and Leisure Facilities	C7[9], C78	C7[9] Strongly support. C78: support for retention of Liskerrett Centre	C7[9], C78: Noted.	
POLICY OSL13 - Provision of Additional Cultural, Community, Arts, Recreational and Sports and Leisure Facilities	B8, C2, C7[10]	B8. Young people seek a cinema where they could get the whole experience, the sound, the big screen etc C2. Leisure is also an important priority modern theatre/cinema with small eating places open in the evening in the town centre C7[10] Strongly support	The proposed mixed use development at Tencreek, outside but immediately abutting the Plan Designated Area, includes provision for a full-scale commercial cinema. However it will only come forward if it is seen to be a commercially viable opportunity by a cinema operator. The Neighbourhood Plan and the two Councils responsible for the area, do not have the legal power to <i>require</i> developers to build and/or operate such a facility, and nor is public subsidy likely to be available. Therefore, the Neighbourhood Plan can only include policies which support the provision of space for a cinema in any redevelopment.	
Project 6 – WHS Interpretation and Local Marketing	B5[8]	There are implied impacts for the World Heritage Site outside of the boundaries of Liskeard and Bodmin Moor on Common Land where the	Project 6 specifically refers to interpretation, education and awareness raising of the WHS, and implicitly must operate within the	Extend the first sentence describing Project 6 to include: '...in accordance with the requirements of the WHS Management Plan'.

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		moorland is under threat from leisure use which could impact on the heritage features and damage the general beauty of the area.	requirements of the <u>WHS Management Plan</u> . This seeks to ensure that heritage assets are protected, conserved, presented and transmitted to future generations, in line with the obligations set out in the UNESCO Convention for the Protection of World Cultural and Natural Heritage (1972). By implication the settings for these assets must also be respected.	
A Place with A Sustainable Future 80 - 83				
POLICY SUS1 - Sustainable Development Standards	D2[20], E47	D2[20]: Supports policy but clarification is required as to what is being sought from the policy in terms of the use of renewable energy sources, and the use of sustainable water sources. In particular it should be considered whether such requirements are justified and viable. E47: Will all new development have to respond to all the criteria? It may be better to have a threshold where this applies. The policy is very prescriptive and not all elements will always be appropriate.	D2[20]: Accepted in regard to renewable energy, amendment to give more detail in the 'Comment' supporting the Policy. E47: It is intended that all criteria should apply.	<p>Page 83 after comment, insert: Proposed heating and cooling systems should be selected in accordance with the following order of preference:</p> <ul style="list-style-type: none"> • Passive design • Solar water heating • Combined heat and power for heating and cooling preferably fuelled by renewables • Community heating for heating and cooling • Heat pumps • Gas condensing boilers and • Gas central heating. <p>Larger developments should consider the generation of a proportion of the site's electricity or heat needs from renewables, wherever feasible.</p>

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POLICY SUS 2 - Improved Communications	E48	E48: This isn't a policy – and cannot be required by policy. Move to supporting text.	E48: Accepted. Amendment proposed to turn into a land use policy.	<p>Amend Policy: New live-work or business accommodation sites shall be provided with a superfast fibre connection, or ducting to facilitate such connection when it becomes available.</p> <p>Where proposals from mobile phone network operators to improve mobile coverage require planning permission, they will be supported where:</p> <ul style="list-style-type: none"> i. the applicant has fully explored the opportunities to erect apparatus on existing buildings, masts or other structures; ii. the numbers of radio and telecommunications masts are kept to a minimum consistent

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				<p>with the efficient operation of the network and have been sited and designed to minimise the impacts on local character.</p> <p>Where proposals are in particularly sensitive areas, applicants will be required to provide additional information to support their application through means including photomontages, accurate visual imagery to industry standards or maps demonstrating sightlines.</p> <p>Comment: Generally full planning permission is only required if a mast is greater than 15 metres in height (although there are some exceptions). New masts below this height are dealt with under Part 24 of the General Permitted Development Order (Amendment)(England)(2001). Other telecommunications development may be erected on buildings or on existing masts, in these cases planning permission may not be required, subject to criteria set out in the Order.</p>
Delivery Plan 84 - 90				
POLICY DP1 - Community Priorities	E6, E7	<u>E6 Developer contributions:</u> Infrastructure required to make a development acceptable in planning	E6, E7: Considering these and earlier representations, it is clear that the Delivery Plan section of the NDP needs	Review Delivery Plan section of NDP to update and add further table identifying CIL 'neighbourhood priorities', and

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		<p>terms will continue to be sought via planning obligations/S106 agreements, even after CIL is adopted. <u>E7 CIL</u>: Provides a description as to how S106 and CIL interact and will function. The process for allocating the remainder of CIL across Cornwall (the portion which is not automatically devolved to Town and Parish councils) has not yet been decided but local priorities endorsed in a NDP are good evidence of community support. E49: DP1 is not a policy. See comments about S106 and contributions in general comments section. 'With regards outdoor space specifically, the Council's Open Spaces team have indicated that they would expect funding for the following to be sought from CIL income (and therefore unable to be sought via a planning obligation):</p> <ul style="list-style-type: none"> Types 3 and 8: provision of outdoor sports open space for community use – the creation or enhancement of formal sports pitches and outdoor sports facilities. Type 5: provision for teenagers – creation or enhancement of formal and equipped areas for teenagers. 	<p>to be recast and updated, with the inclusion of a further table identifying CIL 'neighbourhood priorities', and identifying for local users what will be S106 and the CIL 'strategic' priority themes will be (if this is known by publication date).</p>	<p>identifying for local users what will be S106 and the CIL 'strategic' priority themes will be.</p>

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Table 1 – Policies and Proposals	No comments received			
Table 2 - Projects	No comments received			
Glossary Page 90 - 91	No comments received			
Maps Page 92 - 95	E5, A1[5], C85[3], C90[1], D1[8]	<p>E5, A1[5], D1[8]: <u>Proposals map</u>: The proposals maps needs to be clearer and have larger scale sections to show the extent of allocations referred to in housing, employment and town centre policies along with policy references. It is also hard to tell whether some of the green space designations referred to extend beyond the NDP area.</p> <p>C85[3] on proposals map - shades of green (green spaces, AGLV etc. are confusing, particularly around cemetery & old magistrates court.)</p> <p>C90[1] does map p11 need copyright licence no.?</p>	<p>E5, A1[5], D1[8]: Accepted. Unfortunately, the scale at which the maps were printed caused site details to be suppressed by the software. A larger scale Proposals Map with detailed insets is necessary.</p> <p>C8[3], It is appropriate to show the continuation of quiet lanes and other proposed routes where they extend beyond the Designated Area. However it is agreed that these should be clearly indicated as having the status of 'Suggestions' only. When they are outside the NPD area then will have advisory status only unless that parish adopts them in a NP.</p> <p>C90[1] OS Copyright notice is given on website and in public display maps, but should be on pdf documents as well.</p>	<p>Prepare a larger scale Proposals Map with detailed insets.</p> <p>Show the continuation of routes outside the Designated Area as 'Suggested Routes outside the Designated Area'.</p> <p>Include OS Copyright notices as required.</p> <p>Incorporate changes to development t boundary as required from comments on Policy NP1.</p>

For Insertion at end of document: APPENDIX : EXCLUSIONS FROM OPEN SPACE STANDARDS Open space must be useable for recreation unless set aside for biodiversity reserve. The Appendix lists the types of green and open space that shall not be used to fulfil the open space standard obligations.

- SUDS feature areas used for stormwater attenuation.
- Water unless it is in the form of a formal water sports lake with associated ancillary facilities and car park.
- Outdoor sports, recreational and / or play facilities that are not as a matter of policy and practice available for public use on a regular and frequent basis.
- Educational establishments without a guaranteed level of public access and use for the foreseeable future. Facilities in educational ownership where community use is secured through written agreement can be included.
- Professional sports stadia, private members clubs operating a minimum standard of entry.
- Land used for road side verges and other small (<500m²) green areas, margins to footpaths or cycleways or other narrow incidental areas of land.
- Land whose principal purpose is that of a movement corridor and is less than 10m wide. The only exception to this is that part of a movement corridor that passes through an area that is designated in its own right as informal open space.
- Private garden space, including the communal grounds of flats, specialist housing for the elderly and institutional accommodation.
- Indoor sports halls, leisure centres or health & fitness clubs.
- Commercial entertainment complexes.
- Car parking areas that are not wholly and solely ancillary to an Open Space use.
- Village Hall / community centres where the pavilion use is purely ancillary.
- Golf facilities.
- Allotments (will be sought additionally as a community facility where needed)
- Water bodies and water based activities, except where they form an interactive feature of a formal sports facility with associated ancillary facilities, changing and car parking for water sports.
- Nature reserves or areas of land created and / or managed specifically as part of an approved mitigation and/or compensation scheme in order to secure a planning consent.
- Land which by virtue of its location, accessibility, size, density of vegetation, topography, long term condition, sub-standard safety or for any other reason, is not, and cannot be reasonably made, suitable for sport, recreation or play by the public.
- Ecology areas where public access is undesirable and discouraged, is created to provide nature reserves or where access is impeded by natural conditions.

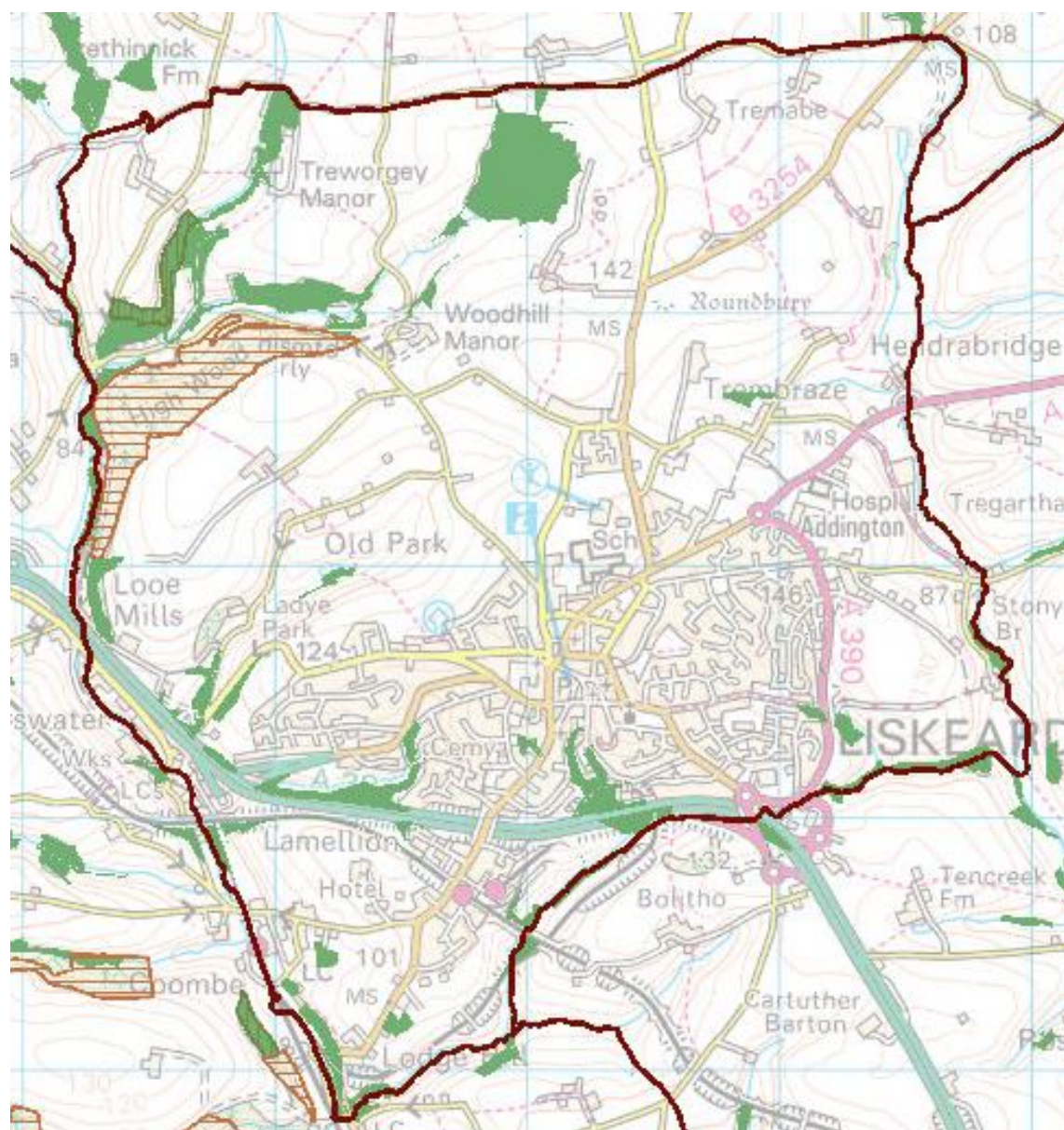


FIGURE A: ANCIENT WOODLANDS AND PRIORITY HABITATS

High Wood and New Plantation Ancient Woodlands, and Priority Habitat Deciduous Woodland Areas to be inserted on the OSL2 (Inset).

Legend

Parishes (GB)

Ancient Woodland (England)

Ancient and Semi-Natural Woodland

Ancient Replanted Woodland

Priority Habitat Inventory - Deciduous Woodland (England)

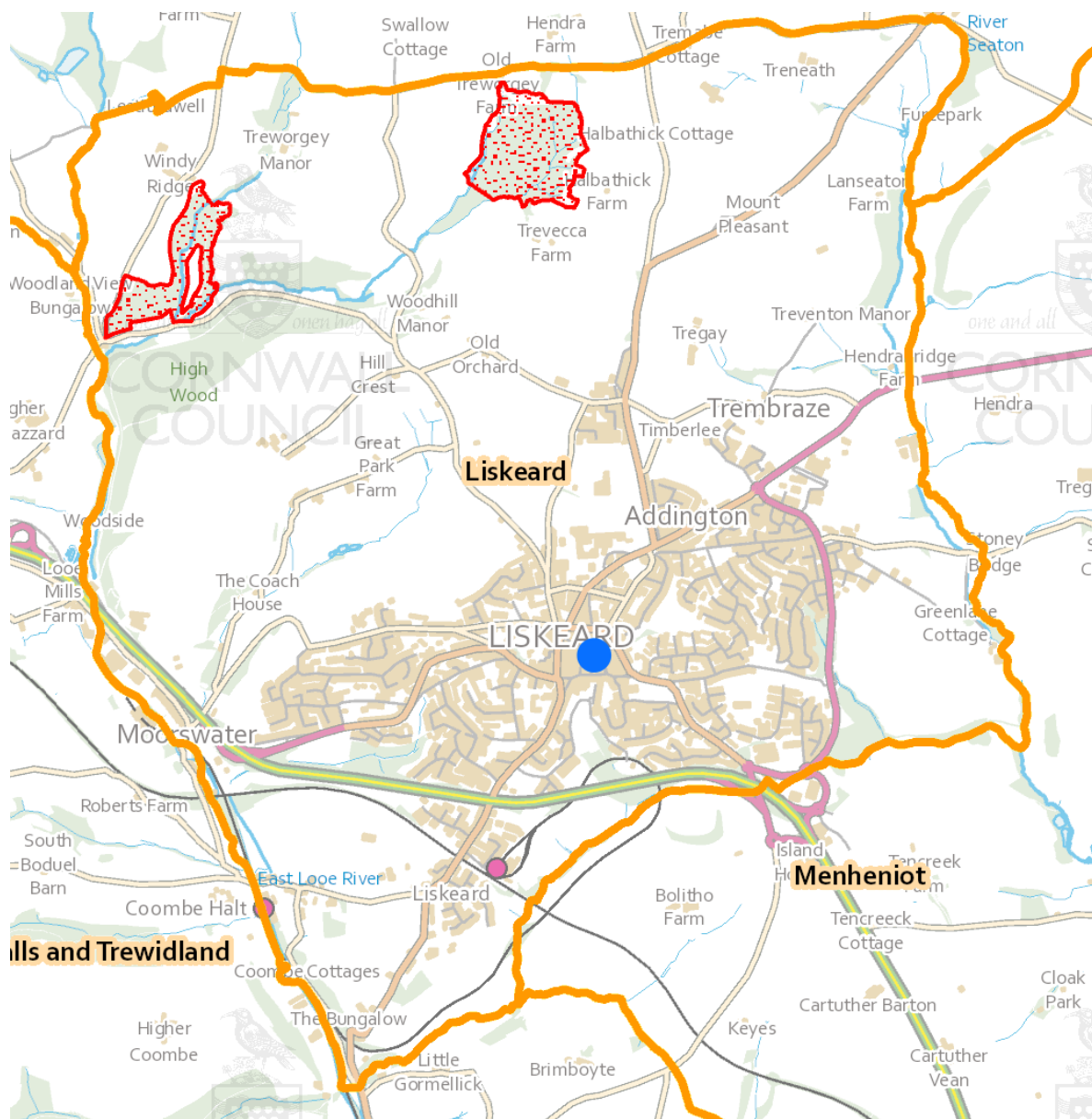


FIGURE B: COUNTY WILDLIFE SITES

Halbathick Wood and Keasts Park Wood
County Wildlife Sites to be inserted on the
OSL2.

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