

## Appendix A.

### Pre-submission consultation (Regulation 14) Formal Consultee Comments and Reference Look-Up: Statutory Organisations

The table sets out the statutory organisations that were consulted during the Pre-Submission consultation stage of the Neighbourhood Plan process, and their responses.

Statutory Organisation	Comment Received	Reference Look-Up
Natural England	<p>Development of the Liskeard Neighbourhood plan is welcomed. We have a number of specific comments. These are set out below.</p> <p><u>Site Allocations.</u> A number of site allocations &amp; proposals for a new green lane to the south of Liskeard appear to fall outside the Plan Area shown on page 11. In addition the Plan area also seems to include boundaries of other plan areas, which is confusing. The plan area should be clarified and only policies/proposals for land within the designated plan area should be included within the Plan.</p>	A1[1]
	<p><u>PolicyEM2.</u> This policy refers to a number of sites identified for employment use. For clarity it is suggested that the policy refers to a named plan showing the allocated sites and that each site is named on the relevant plan. This will avoid any confusion. The same principle should apply to other site specific policies/proposals (e.g. H4) in the Plan.</p>	A1[2]
	<p><u>Ancient woodland and Priority Habitat deciduous woodland.</u> The Plan are contains a number of areas designated as Ancient Woodland (e.g. High Wood) and Priority Habitat deciduous woodland. These areas should be referred to in the document and shown on a Plan. It is suggested that Policy OSL2 (which addresses conservation of greenspace and biodiversity/ecological assets) makes specific reference to the need to conserve &amp; where possible enhance these assets. The location of these features can be found on <a href="http://www.magic.gov.uk">www.magic.gov.uk</a></p>	A1[3]
	<p><u>Local Wildlife Site</u> within the Plan area should also be referred to in Plan text and their location shown on a Plan. Natural England does not hold information on these sites however information on their location may be obtained from Cornwall Council's 'interactive mapping service'. Cornwall Wildlife Trust may also be contacted for information on these sites: <a href="http://www.cornwallwildlifetrust.org.uk">www.cornwallwildlifetrust.org.uk</a> Local Wild Wildlife sites within the Plan area should be referred to in the plan text and shown on a plan. As for Ancient woodland/Priority Habitats</p>	A1[4]

Statutory Organisation	Comment Received	Reference Look-Up
	<p>(referred to above), consideration should be given to making specific reference to Local Wildlife sites in plan policy (e.g. OSL2) for the conservation and enhancement of biodiversity/ecological assets.</p> <p><u>Best and Most Versatile Agricultural Land</u> We have not checked the agricultural land classification of the proposed allocations, but we advise you ensure that any allocations on best and most versatile land are justified in line with para 112 of the National Planning Policy Framework (NPPF).</p>	A1[5]
Environment Agency		
Home and Communities Agency		
Historic England	<p>The Plan is impressive as a very sophisticated and thorough document in its coverage of relevant issues, and the rationale for the objectives, policies and proposals drafted in response. We are particularly pleased to note how 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).</p> <p>The Plan also identifies an extensive number of sites for housing and employment which in location and number could potentially have a significant impact on the historic environment. Any exercises to determine the suitability of the proposed sites in accordance with the (historic environment) policy requirements of the National Planning Policy Framework and associated primary legislation will need 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 (ie alternative sites).</p> <p>The SEA Screening Report relies upon the Sustainability Checklist prepared in support of the Plan together with individual assessment reports for sites of different uses. The methodology employed is consistent for each use type and we have therefore concentrated on the "A Place to Live" Report which assesses the list of possible housing sites. This exercise uses a Criterion Scoring methodology which applies values between 0 and 10 to three aspects of heritage significance, affording a maximum collective impact value of 30 in a scoring regime which numbers 17 criteria in total.</p>	A2[1]  A2[2]

Statutory Organisation	Comment Received	Reference Look-Up
	<p>Such a regime is in its very nature unfortunately not a good fit with the discharging of the requirements of the NPPF. While reference is made to the use of such an approach in the Malmesbury NP we drew attention to its inadequacies in our response to that exercise. Fortunately in that instance the number of sites being assessed was relatively few and the pre-existing understanding of their relative heritage significance made it easy to confirm by additional/alternative means the suitability of those selected.</p> <p>The NPPF requires a demonstration of the significance of relevant assets and for potential impact (harm) alone to be assessed against public benefits – not as one of a number of selection criteria. Those considerations can contribute to the definition and deliverability of the public benefits but consideration of heritage assets in isolation has the potential to outweigh them. The system employed appears to provide no mechanism whereby high levels of impact on heritage assets can be a determining factor in the selection or suitability of sites; nor does it indicate from a qualitative point of view how such impact might equate to harm, how judgement has been applied to determine respective outcomes, which heritage assets have been assessed, and how their differing levels of heritage significance and status has informed the assessment process.</p> <p>Our previous advice identified the existence of 6 Grade II* and 187 Grade II Listed Buildings, 2 Scheduled Ancient Monuments and 1 Conservation Area within the Plan area, making it rich in heritage assets. Section 11 of Table 2 of the SEA Screening Report states that there is a risk that infill development sites within the town centre could impact on historic assets. Given this and the manner in which the sites have been assessed it is not clear how the Report is able to conclude that it is unlikely that there will be any significant environmental effects arising from the Plan.</p> <p>On the basis of the information provided we are unable to agree that sufficient, suitable evidence exists to be able to confirm that an SEA is not required, nor that the contents of the Plan are in conformity with the NPPF and Local Plan</p>	
Devon & Cornwall Police	Note and very much support the references to Designing out Crime within objective 9, and policy H10. The only suggestion I would make is with regard to the current statement which reads "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	A3

Statutory Organisation	Comment Received	Reference Look-Up
	crime". I would propose adding the following - "disorder and antisocial behaviour" at the end, after the word crime. Many of the incidents which affect local communities are perhaps not strictly speaking crime, but fall more into the antisocial behaviour bracket. By ensuring reference to this as well as crime in the plan it will hopefully helpfully ensure future designs and development properly consider all such issues.	
Network Rail		
Highways Agency		
Marine Management Organisation		
Three (Mobile)		
O2 and Vodafone (Mobile)		
EE Mobile		
OFCOM		
Royal Cornwall Hospital Trust		
Peninsula Community Health		
Kernow Clinical Commissioning Group		
Healthwatch Cornwall		
National Grid		
Western Power Distribution		
EDF Energy		
Wales and West Utilities		
British Gas		
South West Water		
St Cleer Parish Council		
Menheniot Parish Council	Menheniot Parish Council has discussed the impact of the Liskeard NDP on their locality, and 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, 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.	A4
St Keyne Parish Council		

Statutory Organisation	Comment Received	Reference Look-Up
Dobwall Parish Council		

## Appendix B.

### Pre-submission consultation (Regulation 14) Formal Consultee Comments and Reference Look-Up: Local Organisations

The table sets out the local organisations that were consulted during the Pre-Submission consultation stage of the Neighbourhood Plan process, and their responses.

Local Organisation	Comment Received	Reference Look-Up
Liskeard Town Forum	<p>The Town Forum supports the emerging NDP and are willing to assist with the delivery of the proposals relating to the sympathetic regeneration of this historic market town. As an organisation that works to bring all of Liskeard's communities together for a common purpose, the overarching aim that our membership agreed was to support the regeneration of the town. In doing this, we support the Neighbourhood Development Plan.</p> <p>In a practical sense, this means that we have created a £3,000 Regeneration Fund that will support community groups making application for contributions towards projects contained in the NDP. It means that we will take an active role in assessing planning applications that may impact on the towns regeneration using the NDP as a marker. We will do this by encouraging discussion, debate and engagement across all communities in the town.</p>	B1
Royal Mail	<p>The latest version of the LNP (Nov 2016) identifies land including an area to the rear of the Liskeard Delivery Office as a potential location for a new large scale retail development (policy TC1. The accompanying 'Place to meet shop and do business WG report identifies the site as an 'opportunity site' (ref. 01B) for town centre redevelopment and notes that the site is currently in use as a sorting office "but maybe moving out of town". Whilst the possibility of relocating the Delivery Office (DO) has been discussed in the past, Royal Mail confirms there are no plans in their strategy to relocate</p>	

Local Organisation	Comment Received	Reference Look-Up
	the Liskeard DO, unless an alternative suitable site could be found at no cost to the business. It is requested therefore that reference to redevelopment on Royal Mails property is removed from the Neighbourhood Plan.	
East Cornwall Harriers	<p>East Cornwall Harriers welcome's the inclusion of Policy OSL6 to provide additional sports/recreational facilities at 'Roundbury Park'. Evidence indicates Liskeard is underprovided for in terms of sports/recreational facilities and there is a need to provide more opportunities for existing and future residents of the town. As a club we are 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. Currently there is no purpose built running tract in the area to encourage competitive running. Training for the majority of the year has to take place on the public highway which is not ideal. Inclusion of a purpose built running track would significantly assist our ability to attract and offer training to residents of all ages and abilities. At present our ability to attract young runners is particularly hampered by having to rely on the public highway for training facilities in the winter. Running has growing popularity beyond being a just a sport and can appeal to an increasing cross section of the local community.</p> <p>Page 65 Policy:OSL11A East Cornwall Harriers believes there is an opportunity to recognise that pedestrian, equestrian and cycle routes provide also very good opportunities for joggers, runners and others wanting to improve their fitness. Many of these routes could provide popular 'fitness trails' (routes 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><b>B2[1]</b></p> <p><b>B2[2]</b></p>
Liskeard & Looe RFC (on behalf of) Liskeard & District Sports Assoc.)	Support for policies that will bring forward additional pitches for Cricket, Football and Rugby, (plus facilities for Tennis, and Hockey). (precis)	<b>B3</b>
Liskeard Athletic FC	Football club - great need for Recreation and pitches on Roundbury/Alt15, as there are too few pitches at the moment, and what is available costs a lot to hire. ALT 15 Open Recreation St Cleer Rd (Roundbury) Liskeard AFC; the foot ball club is desperate for more pitches, so that it can progress as a club. At present we have 3 senior teams, and 4 junior teams, and only 1 pitch to play on.	<b>B4</b>
Mike George CC Councillor Liskeard West Ward		
Roger Holmes CC Councillor Liskeard North Ward		

Local Organisation	Comment Received	Reference Look-Up
Sally Hawken CC Councillor Liskeard East Ward		
Derris Watson CC Councillor St Cleer, St Neot & Warleggan	<p>I think this is a comprehensive and well written plan. I have had thoughts about some aspects of it as a resident of a neighbouring parish who was engaged in completing a Neighbourhood plan for St Cleer.</p> <p><b>Development Boundary</b></p> <p>It would be good to see an 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. St Cleer is keen to preserve its identity and would view development close to the boundary between the two parishes as a threat to this.</p> <p>Reason St Cleer has little space to the north of the built area due to the proximity of the WHS and the constraints of Common Land designations, therefore redevelopment of the redundant Horizon laying site, which is close to the southern boundary is supported by the NDP for St Cleer.</p> <p><b>A Place to Learn and Work</b></p> <p>Agree that new employment opportunities are vital to support the development of housing.</p> <p>I feel that inward investment and economic regeneration is important for the future of both Liskeard and SE Cornwall. The need to safeguard land for employment use is an important aspect of this. It is important that mixed use sites preserve the quality of life for residents of housing which is in proximity to industrial uses.</p> <p>Reason Good quality employment is essential to the economic future of both Liskeard and its hinterland.</p> <p><b>A Place to Live</b></p> <p>I definitely support the Housing and Employment balance policy H3. Recent new build in Liskeard seems for the most part to have comprised high density developments and leads to a very urban feel rather than that of a rural market town. Use of architects in planning developments can help to mitigate the usual desire to cram every possible space with dwellings and make estates much better places to live.</p>	<p><b>B5[1]</b></p> <p><b>B5[2]</b></p> <p><b>B5[3]</b></p> <p><b>B5[4]</b></p>

Local Organisation	Comment Received	Reference Look-Up
	<p>This may be attained under H8 which is a comprehensive expression of need.</p> <p>St Cleer evidenced the need for 120 new housing units as part of the overall contribution of the Community Network Area to the total for Cornwall and one of the sites for this lies fairly close to the southern boundary of the parish it is hoped that Liskeard may be able to safeguard its northern boundary to stop coalescence of the settlements.</p> <p>I am not so sure about H9 which speaks of increasing and maintaining existing densities, although there is a great need for units suitable for small households these need to have enough living space within them to enhance the lives of their occupants.</p> <p><b>A Place to Meet, Shop and do Business</b></p> <p>As someone who visits Liskeard for these purposes I have to say there are many issues.</p> <p>The cost of parking makes one consider whether it is worth the cost of visiting. There is an unbalanced mix of shops., being mainly estate agents and fast food or charity shops. There are currently many empty premises. Extra residents, if they have good quality employment and therefore spending power may well encourage a wider range of both quality and focus in the shopping area. There are several inviting independent outlets which service their niche markets but it would be great to have a wider offer with more known brands.</p> <p>The rich cultural and historic heritage of Liskeard should be used to maximum effect in branding it as the “Gateway” to visitor experience in this field. Generally this sector is older and has a reasonable spend level. Bringing this group of cultural visitors to Liskeard and the area would benefit tourism without the need for extra development and would benefit existing businesses.</p> <p>If you look above the modern shop fronts there is a wealth of architectural interest. It is important that the original buildings which give character to the town are retained as much as possible and at least facades where it is not possible to convert the existing main part of a building.</p> <p>Above all make the shopping centre user friendly for those who need to access from Liskeards hinterland. Convenient and affordable parking for those who must travel by car and currently by pass the centre to use out of town places like Morrisons or B&amp;M would encourage footfall.</p>	<p><b>B5[5]</b></p> <p><b>B5[2]</b></p> <p><b>B6[6]</b></p> <p><b>B5[7]</b></p>



Local Organisation	Comment Received	Reference Look-Up
	<p><b>A Place to Relax and Enjoy</b></p> <p>I agree with what is written but there are implied impacts for the World Heritage Site outside of the boundaries of Liskeard and Boodmin Moor( Project 6). It should be remembered that Common land is in fact privately owned and that the public have only the right of access of foot. Vehicles, including bicycles, and horse riders have no right of way or access. The moorland is under threat from leisure use and dog owners . Dogs have negative impacts on both stock and wildlife and faeces left by irresponsible owners cause severe health impacts in grazing animals. It is possible that due to these pressures grazing may cease, as has happened on St Cleer Downs, and the land will revert to impassable scrub and bracken. This would impact on the heritage features which would be lost to view and the general beauty of the area.</p> <p>I am concerned that proposed Quiet Lanes either end abruptly in narrow unpaved roads well used by vehicles or include main roads like the A390</p>	<p><b>B5[8]</b></p> <p><b>B5[9]</b></p>
Phil Seeva CC Councillor Menheniot Ward		
Sheryll Murray, SE Cornwall MP		
Chamber of Commerce		
Trader's Association		
Caradon Hill Area Heritage Project		

Fire & Rescue	See Cornwall feedback	<b>B6</b>
Lions Club		
Round Table		
Rotary Club		
NFU		
Stuart House		
Liskerrett Centre		
Old Cornwall Society		
Lux Park Leisure Centre		
U3A		
Walkers are Welcome		
World Heritage Site		
Cycling Group		
Business Enterprise Centre		
D&C Rail Partnership		
SE Corn Chamber of Commerce		
ECCABI	Re policy EM6 Employment Project 2. Could this be considered for high priority to take advantage of CLLD funding, which is expected to be available from March 2017	<b>B7</b>
Lantoom Quarry		
SE Corn Tourist Ass		
Caradon Monthly Walkers		
Corn Cycle Touring Club		
Sustrans		
Real Ideas Organisation		
Wesley Mother & Toddler Group		
Intercom Trust		
Gay Cornwall		

Liskeard Community College	<p>Liskeard Sixth Form Students suggested the following: They said that they would really like a cinema, not just a pop up cinema, they wanted a cinema where they could get the whole experience, the sound, the big screen etc.</p> <p>They were disappointed that Weatherspoons had not been built in the end as this would have been somewhere that they could have gone to eat. A local market would add life to the town, they felt.</p> <p>They were interested in providing houses for first time buyers and also providing or refurbishing buildings for older people like Lamellion.</p> <p>Someone suggested an outside gym. This is a running track and at various points you have stations to do different exercises. These have been popular in other towns.</p> <p>The pop up shops had been popular, could this idea be reinstated.</p>	<p>B8[1]</p> <p>B8[2]</p> <p>B8[3]</p> <p>B8[4]</p> <p>B8[5]</p>
St Martins School		
Hillfort School		
St Martins Church		
Methodist Church		
Catholic Church		
Catholic Church		
Quakers		
Grace Church		
Ark Mission		
Greenbank Christian Centre		
Greenbank Church		
Trader's Association		
Liskeard Town Forum		
Caradon Hill Area Heritage Project		
Rosedean Surgery		

Oak Tree surgery		
Eventide Residential Home		
Passmore Edwards Court		
ECHO Centre		
Greenbank		
Morley Tamblyn	<p>"In general the plan is a well-structure outline for the future, but feel that the continued residential development in the area should be balanced with the current and future development of facilities such as doctors, dentists, school sizes etc. - also feel that in the development of some particular areas such as H6, if this was in the Lodge Hill area, there needs to be a clear and safe access to the town centre on foot.</p> <p>The idea of having a large area of land set aside for recreational use is an excellent idea in OSL6; this is a much needed facility for the community and if managed well could have a very positive impact on both the younger people of the area and others who may wish to improve their wellbeing. Would also like to see more done at a higher level to encourage local traders to be a focal part of the town, at the moment Liskeard is not a very attractive place for people passing through to stop and look around - there are several empty sites and many unsightly ones."</p>	<p>B9[1], B9[2]</p> <p>B9[3]</p> <p>B9[4]</p> <p>B9[5]</p> <p>B9[6]</p>

## Appendix C

### Pre-submission consultation (Regulation 14) Individual Community Comments and Reference Look-Up

The table below sets out the individual comments receive from members of the community during the Pre-Submission consultation.

Comment Received	LNDP Meets expectations	Reference Look-Up
What facilities are there for disabled children? Any clubs or social events or a place to meet? Any sensory gardens or soft play areas available? Any projects that families can take part in such as a community market garden or community orchard?	--	C1.
Leisure is also an important priority modern theatre/cinema with small eating places open in the evening in the town centre. One of the cattle market plans looked good.		C2.
<p>I agree with the main themes, employment to bring money into the town. Open spaces a town needs parks somewhere to walk and for picnicking,</p> <p>I like idea to keeping Roundbury and the large heritage area north of the town.</p> <p>Please ensure we keep to the development boundary at least to 2030.</p>	yes	C3[1] C3[2] C3[3]
<p>I think that all shops and services in the town centre should get themselves websites and club together to install a town wide WiFi. Looe do it during their Music Festival so it can be done. If necessary contributions could come from new developments through S106.</p> <p>More about mixed use developments near to town centre to attract knowledge based businesses that would bring better wages and skills to the area, and help uplift the feel of the town centre to be more vibrant.</p>	yes	C4[1]  C4[2]
<p>Flowers have been fantastic in Liskeard this summer; hope that continues as it helps to positively market our town. Your idea of planting tree-lined boulevards along some streets sounds wonderful - visually attractive on approach to town and great for wildlife and environment.</p> <p>Particularly like your policies protecting the hinterland as a leisure area. We regularly use the Caradon trail just North of the town, for an easy but lovely walk, and see lots of other people out and about using it too –</p> <p>you say it could get quiet lane status - think this should be a definite to protect and enhance it for future generations.</p>	yes	C5[1] C5[2] C5[3]

Comment Received	LNDP Meets expectations	Reference Look-Up
<p>The plan covers a lot of the things that would improve Liskeard and is well set out and easy to read. Good idea to try and build on brown field sites, but what will Cornwall Council Planners do to support this rather than allowing developers to go for greenfield sites in the countryside?</p> <p>The cattle market needs to be redeveloped - looks like something might be happening now, but hopefully it does actually happen this time, after all these years. Plenty of space for community uses as well as a possible small supermarket to attract people into the town centre, instead of going to the ones on the edge - and I think later-living apartments have been suggested, which would be a good idea too with our aging population. We also need Wetherspoons to be built.</p>	yes	<p>C6[1] C6[2]</p> <p>C6[3]</p> <p>C6[4]</p>
<p>Many congratulations to the steering group and all involved in producing this report - a huge amount of work has gone into the research and consultation and writing. Thank you! Overall we are very supportive of this plan. For us as a newly retired couple without a great deal of surplus income Liskeard provides much of what we want - we have access to great countryside; we can buy food and household goods cheaply (Morrisons, Aldi, Parade Discount Stores and Poundland); and we have skilled teams locally to look after our vehicles, our animals and our own health without being over charged. At the moment we also have access to a low cost leisure centre (premises need upgrading) and to great support for our hobbies through Cycling UK Cornwall, East Cornwall Harriers, East Cornwall Riding Club. the local history societies and Painters. Ofcourse, we would all like to see more life injected into the town centre so that it doesn't become a ghost town and we end up doing a disservice to our great architectural heritage and we agree that this is best achieved through carefully building a mixed community - very hard to achieve. So our specific comments are as follows: Introduction and Vision including development boundary - strongly support this A place to work and learn - support this but wonder if there should be more emphasis on encouraging SELF EMPLOYMENT OPPORTUNITIES. Cornwall is the perfect location from which to run your own small business - people mostly just need help with development of their skills and sometimes some start up funding and later, perhaps, workshop space. Also, we wonder whether there is any opportunity of encouraging CORNWALL COLLEGE TO OPEN A DEPARTMENT HERE IN CENTRAL LISKEARD e.g. as part of the Cattle Market redevelopment. The presence of students in the town centre would immediately encourage the introduction of bars and clothes shops and would introduce some life into the town. My son had travel for two hours a day to St. Austell and back for two years - difficult for him and a wasted economic growth opportunity for the town. A place to live - we support this. A place to meet, shop and do business - strongly support Objective 2 - presumably we want to encourage places for tourists to browse all summer and home owners to do so on a Saturday morning. DELICATESSENS are really important for this, as well as PLACES TO DROP IN AND HAVE HALF A PINT, A HOT CHOCOLATE OR A SPECIALITY COFFEE when you have finished browsing. Policy TC4 (Cattle Market) - support this but am not sure that Liskeard could support another supermarket - OR THAT A RETAILER WOULD WANT TO BUILD ONE - even</p>	yes	C7[1]

Comment Received	LNDP Meets expectations	Reference Look-Up
<p>medium sized - and that it might be much better to encourage great small retailers, like farm shops and delicatessens - provided the lease costs can be kept low enough to give them a chance to succeed and to be competitive with Morrisons, etc. Policies TC8 and TC9 - strongly support A place to relax and enjoy - strongly support, particularly: Objective 2: these proposals would greatly improve how Liskeard feels - e.g. shared space nearly always works well Objective 4: strongly support - relatively low cost and easy to implement Objective 5: strongly support with the addition that we would want to encourage the negotiation of PERMISSIVE ROUTES for walkers, cyclists and horse riders. They are far easier to negotiate and in most cases will be maintained through good will. Strongly support policies OS11A and OS11B. Objective 6: strongly support - we need to be certain the town is able to ensure the provision of good leisure centre facilities - low cost for residents but a good enough quality for visitors to use when there is poor weather. Policies OSL12 and OSL13 - strongly support. Objective 8: strongly support Thank you very much for the opportunity to comment.</p>		<p>C7[2]</p> <p>C7[3]</p> <p>C7[4]</p> <p>C7[5] C7[6]</p> <p>C7[7]</p> <p>C7[8]</p> <p>C7[9]</p>

Comment Received	LNDP Meets expectations	Reference Look-Up
		C7[10]
I am pleased to see that the Plan is using existing brownfield sites and land within the proposed boundary to achieve the required number of new houses up to 2030. I also agree with linking all outlying areas of housing with the centre of the town via safe cycleways and walkways	yes	C8[1] C8[2]
I think it is vital for the success of Liskeard to have a quality major food store in the Market. this will give people the reason to come to the centre of the town. Morrisons is always busy! However it must be limited to food in its sales to minimize it's impact on the other town independents as much as possible.. Also is it possible to move the market to an edge of town site to save mixing animals with a modern town centre?	yes	C9
OS1 - Retain existing green spaces OSL2 - As the town expands, more pedestrian accessible green spaces very much needed. OSL4 - 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 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. 3. Liskeard is poorly served with decent walks. OSL6 - Dark skies very important for this area. Liskeard already over illuminated by sports pitches. Essential that any new leisure facilities have downward facing flood lights and existing ones changed. OSL7 - 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. OSL8 - As already stated, Liskeard is poorly served with decent and accessible walks and outdoor exercise facilities. An off road moor to shore cycle and pedestrian route (Looe to Minions) would not only provide these essential amenities, but would attract visitors to the town. This would also work well in combination with our trains	Yes	C10[1], C10[2] C10[3],  C10[4],  C10[5],  C10[6],
I think that the plan is very thorough and I'm impressed by the scope of the plan.	yes	C11[1]
I feel that Liskeard cattle market area will only succeed if a key supermarket retailer can be found to be the focal point for a new development that then can also include the other amenities such as a community space, cafes, individual shops etc. I have seen this work very successfully in Portishead, Bristol. Once Waitrose was in place a lot of other facilities followed and the town has been rejuvenated, not solely due to Waitrose of course however once a major retailer shows commitment and buy in, others will follow. Currently Liskeard is suffering from not having a central		C11[2]



Comment Received	LNDP Meets expectations	Reference Look-Up
point as Barras St is a busy road and so detracts from it being a central pint. The plan for Barras St is also good - the site by Stuart House needs to attract a family friendly pub or restaurant to attract more people to the town centre when shops are shut. Having experienced the large number of people using Table Table there is clearly a need for more eateries in Liskeard.		C11[3]
	yes	
I broadly agree with the neighbourhood plan but think that it is going to be very important to attract the right retail companies to the town without this and much more quality employment opportunities I think it is going to be difficult to stop Liskeard being a dormitory town.	Yes	C12
Industrial should be by A38		C13
Cattle Market car park suitable (in part) for residential later living housing. Residential best away from noisy A-roads		C14
Well done! Reflects the views of the people of Liskeard very well		C15
Encourage more manufacturing jobs to the area		C16
definitely need later living units- what about on some of the empty town sites or cattle market site		C17
Some fantastic ideas - Jobs before housing. Quality housing for all		C18[1], C18[2], C18[3]
Looks like we've taken on board a lot of houses as I can see stipulated by Cornwall Council - fair enough you've found sites for them all but what happens when more developers want to build here when we've already got enough for years to come		C19
Liskeard needs an agricultural focus as it's in a rich farming area, especially if the cattle market closes		C20
Use "brownfield" sites before greenfield as in the Neighbourhood Plan		C21
We do not want Liskeard to become a dormitory town - don't spoil its character - if its got to grow it should be at a steady rate		C22
Liskeard is taking a large amount of housing. How will the planners make sure that other areas take their fair share? How do we prevent more & more housing when other areas are not delivering their quota - Liskeard should not be a dumping ground.		C23
Really pleased to see taken on board building on used land for houses - brownfield sites must be used first before farmland taken		C24
Re policy EM6 Employment Project 2. Could this be considered for high priority to take advantage of CLLD funding, which is expected to be available from March 2017		C25
I'd like to see a frequent bus service to and from the station		C26
Crossing end Gypsy Lane to Limes Lane should be a footbridge. Costs a lot but human lives are worth it. Someone is going to be killed		C27

Comment Received	LNDP Meets expectations	Reference Look-Up
develop brownfield sites - absolute priority. Later living units		C28 [1], C28[2]
A lot of work has gone into this. Lets hope Cornwall Council takes notice		C29
Developers/builders need to have real incentives to use run-down brownfield sites and not agricultural land, but like your policy about developing on run-down sites in Liskeard - they absolutely should be used first		C30
Really great that someone is taking an interest in Liskeard and the whole area		C31
Good to see new employment space planned and in a sensible place near the main A 38 for lorries and deliveries		C32
Cycle racks at top of baytree Hill area		C33
A comprehensive and thoughtful plan that holistically considers the future of Liskeard. Well presented and accessible		C34
Liskeard is taking a large amount of new housing, but where are the developments happening in our rural areas to keep essential services like bus routes and schools open? We have a large number of villages in Cornwall that could be far more sustainable with appropriate housing and employment development. It should not just be the towns that take nearly all the housing and especially if done too quickly - there can be many negative impacts. Balanced communities across Cornwall is essential for everyones health and wellbeing.		C35
Excellent Plan - well done! Re Cattle Market - sheltered accommodation for older people is a good idea (just like Passmore Edwards site).		C36
There are many brown-field sites around the town, which should be used for housing in preference to good agricultural land.		C37
Agree with OSL1 & 2, to protect existing and enhance green spaces as the town grows		C38[1], C38[2]
p74 AGLV OSL10 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.		C39
I am sure we are building on too much farm land - we will need it to grow food - we must be self-supporting.		C40
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.		C41
Essential to keep Liskeard as the prime agricultural centre for East Cornwall. If you want to lose the market town status & turn it into a One Horse Town like Callington, dead in the middle of the day (close the Cattle Market). I have 4 grandsons Farming from 17 to 28yrs		C42
There are a lot of old sites with run-down empty buildings in many instances. Something needs to be done to bring them back into use before they fall down.		C43
Good to see a well-rounded plan for the immediate future of Liskeard - gives the town some dignity. Seems fair, proactive and represents local views.		C44

Comment Received	LNDP Meets expectations	Reference Look-Up
There are many semi-derelict and run-down sites in Liskeard which spoil its appearance, so it is pleasing to see your brown field site policy aimed at suitable housing infill, which would tidy up these eyesores, enhance the present architecture and bring some vibrancy to our town centre.		C45
I agree that Brown field sites should be used for housing rather than good farm land.		C46
Proposed crossings of New Rd must be uplifted from proposed and actually built - very dangerous road walking route between Allen Vale and railway; Lanchard Lane to Primary school. Lets walk not get fat in cars		C47
Very positive plans. Pleased heritage and listed buildings have been realised as treasures to be retained		C48
Why aren't there any new houses going in near the station? All the trains stop here and its good for travel to work		C49
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.		C50
More retail units		C51
Good to see support for employment and training - will Cornwall be willing to fund this?		C52
Plan is well set out and includes a good overall vision for the town		C53
An in-depth, workable document that comprehensively recognises Liskeard's strengths and weaknesses. A monumental piece of work. Well done all!		C54
make sure you put houses on brownfield land rather than farmland		C55
Plan going along the right lines. Liskeard needs to be the hub - broadcast what we have, encourage people to join in & move forward.		C56
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)		C57
Please consider the young, the infirm, the vulnerable and the elderly		C58
Excellent to see cycle trails and also consideration of where we locals walk, run etc. Wonderful countryside and quiet lanes so easily accessible on the edge of our town. Should be protected from ever sprawling housing estates and too many cars on back roads not built for them.		C59[1] C59[2]
Moorswater: extend employment area into Dobwalls parish to include industry units (china clay sidings)		C60
Affordable housing		C61
I am 17 and farming at Penhale Farm, Dobwalls & sell & buy cattle & sheep at Liskeard Market. If it closes I have to take my stock to Exeter which is too far for my tractor & I like to meet my neighbours & exchange ideas & problems. (name supplied)		C62

Comment Received	LNDP Meets expectations	Reference Look-Up
covered in cattle market- what markets etc could be held		C63
What is happening in West Liskeard to stop it dying. New houses built but no facilities, spar shop, café, employment, life		C64
I broadly agree with the Neighbourhood Plan, but think that it is very important to attract the right retail companies to the town. Without this and much more quality employment opportunities I think it is going to be difficult to stop Liskeard being a dormitory town. More Jobs		C65[1], C65[2] C65[3]
crossing of New Rd needed		C66
More poo bins		C67
More church buildings		C68
Too many workers park in housing areas - should be directed to suitable car parks so home-owners can park		C69
See suggestion for a hopper bus - should be a priority for our community		C70
I don't think parking is expensive- there are plenty of legitimate spaces within easy walking distance of the town		C71
OSL2 As the town expands, more pedestrian accessible green spaces very much needed.		C72
Better and more park/recreation areas		C73
price of car-parking too high - too many cars parking in side-streets		C74
Cycle way through Sungirt?		C75
Needs somebody to tell home owners to keep their vegetation off of public footways - some are becoming impassable		C76
It would make sense to include some houses near the station so that people can travel easily to work - and its sustainable which I'm pleased you've thought about in your report. It would fit in with the workplaces there as well		C77
Support for Liskerrett centre - an important feature of the town		C78
I feel we are short of visitor accommodation		C79
A good restaurant for eating/coffee in the evening		C80
Well done - seems to cover the many diversities in the local area - good balance of work and relaxation activities.		C81
Sheltered housing needed - Churchill etc		C82
Policies TC8 and TC9 - strongly support		C83[1], C83[2]
A succinct summary of Policies needed to engage public. Otherwise the document is a challenge for consultees to digest and comment on.		C84
Map p25 should say 'parish boundary' rather than 'parishes' plus should continue across Island Shop Jn. Re 'proposal EM3' - should read 'policy...' and on proposals map - shades of green (green spaces, AGLV etc. are confusing, particularly around cemetery & old magistrates court.		C85[1]. C85[2], C85[3]

Comment Received	LNDP Meets expectations	Reference Look-Up
Roundbury recreation hub sounds a brilliant scheme because it includes facilities for all ages including families, so hopefully encouragement for everyone to get fitter. If the housing from Addington extends up to it could that provide better access to the site for walking and cycling as well as vehicles?		C86[1], C86[2]
A Lidl supermarket in Market car park.		C87
I feel we are short of good eating places		C88
I think the plan is thorough and I'm impressed by the scope of the plan.		C89
does map p11 need copyright licence no.? Caradon Plan p16 now superseded by Cornwall LP so no longer main source of local planning policy. Some useful policies 'saved' from Caradon plan are no longer, so need reinforcing through NP.		C90[1], C90[2], C90[3]
Introduction/Vision including development boundary - strong support for this		C91
Make sure this time something is done about the cattle market - needs development so that it has a useful purpose - not left as the derelict eyesore that it is now		C92
A place to live - support this		C93
What is happening to closed play areas - Henfordh Grange; St Martins court?		C94
Also agree with allotments on the West side of town.		C95
Need to indicate publicly accessible view-points/cherished views/landscapes that are valued in the locality		C96
Support more recreation and leisure especially for young adults/teens. A small cinema located in one of the many underused buildings in town - not a multi-plex. More evening locations, restaurants/bars.		C97[1], C97[2], C97[3]
Wetherspoons ASAP		C98
OSL1 retain green spaces		C99
Footpath needed on Charter Way, safe path from Liskerrett area to Morrisons		C100
A well-rounded plan that more than provides for the development of Liskeard up to 2030. Also good to see protection of our heritage and landscape assets around the edge of the town as well as buildings in the centre.		C101
OSL 11A/B agree with creation of circular and cycle-friendly round-Liskeard trail - with connections into the town centre. Extending to Minions and Looe would provide better outdoor walking and cycling facilities as we are short of these - and this would link in well with the station for both locals & attracting visitors.		C102

Comment Received	LNDP Meets expectations	Reference Look-Up
OSL9 insist on downward facing lights on all leisure facilities - Liskeard has poorly adjusted lights on its sports pitches creating glare and this needs to be sorted out to protect our rural dark sky hinterland		C103
Essential to provide, as stated in OSL7, allotments/community orchards on new developments, as they include little in the way of gardens		C104
p38 H1 clarify wording to make clear where development can happen - at present could go anywhere. P44 need something that promotes housing for the elderly. P47 H10 (a) should not base design stds on whats there already, but should make sure bad design is not perpetuated by copying it.		C105[1], C105[2], C105[3]
Pleased to see concern and interest in protecting our wonderful landscape and heritage to the North of the town. Definitely should extend AGLV & include Ladye valley down through Culverland. A wonderful asset for Liskeard.		C106
Cherished views: need listing and mapping		C107
On first impressions looks thorough and inclusive and can see a lot of time and effort has been spent on it. Thank you for doing something positive for Liskeard		C108

#### Appendix D Comments by Developers and Land Owners

Comment Received	Reference Look-Up
<u>Persimmon Homes</u> Policy NP1 The Neighbourhood Plan Boundary and its extension.	D1[1]

Comment Received	Reference Look-Up
<p>We note the Neighbourhood Plan Boundary as drafted in the plan at policy NP1 shows a notional extension to include Menheniot parish. Persimmon Homes believe the Neighbourhood Plan Boundary should be similarly extended to the north of the town to include land north of the existing development site at Addington, east of Trevecca Cottages and west of Tregay Farm, which benefits from an Outline Planning Consent for a major residential scheme (see proposal inset below).</p> <p><b>MAP TO BE PROVIDED</b></p> <p>This addition at policy NP1 will facilitate the delivery of the Round Liskeard Trail extension and give certainty to its delivery. Furthermore, the proposed allocation site would link this policy with the proposed extension to the Area of Great Landscape Value proposed to the north of the current Addington development. This would add clarity to the delivery of policies in this area as expanded upon in the 4th and 5th bullet point below.</p> <p><b>Meeting the Housing requirements of the Cornwall Local Plan Policy H1</b>  The allocation and inclusion of the Charter Way Scheme together with the other planned and allocated sites demonstrates a small housing surplus. The Local Planning Authority note in the Cornwall Local Plan, that major development sites can take up to 4 years to gain beneficial planning permission and commence delivery. This is taken account of in the Council's Delivery Strategy. In this regard 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. This approach would accord with the Local Plans Expert Group recommendations set out in their paper to DCLG, March 2016.</p> <p><b>Policy H4 Allocation to meet the current Housing Target</b>  The allocation and inclusion of the Charter Way Scheme to meet the current housing target will provide a 9% surplus to plan requirements. It would be consistent with National guidance to provide flexibility in the site allocations by identifying reserve sites. The land to the north of the Addington major urban extension provides this opportunity, is a logical extension to the existing planning permission and provides the opportunity for delivery of any shortfall in housing allocation.</p> <p><b>Policy H5 (a) Neighbourhood Plan Assessment of extensions to the area</b>  This Policy states that extensions to the development boundary should be of an appropriate scale to the area beyond the Neighbourhood Development Boundary, as set out in policy in NP1. Such an extension may be permitted if they are in accordance with the plan's Assessment of Sites, ranked in terms of sustainability and suitability. Persimmon Homes contend that the area of land to the north of the existing Addington scheme, east of Trevecca cottages, up to the boundary of the proposed extension to the Area of Great Landscape Value would fit these criteria because:</p> <ul style="list-style-type: none"> <li>• The site is in an area where growth has previously been allocated and consented</li> <li>• Housing is being delivered</li> </ul>	<p>D1[2]</p> <p>D1[3]</p> <p>D1[4]</p>

Comment Received	Reference Look-Up
<ul style="list-style-type: none"> <li>• Is sustainable due to the proximity of local facilities (proposed and existing)</li> <li>• The inclusion of the site would allow for the provision of enhanced and additional community facilities to coordinate with the delivery of the proposed round Liskeard Trail extension and Policy OSL 9 / Policy Alt15 "Roundbury Park.</li> <li>• Policy H5(c), H5(d) and H5(e) would be substantiated by the infrastructure and provisions being delivered as part of the Addington scheme.</li> </ul> <p><b>Policy H5 (f) Self Build</b> It is not workable or practicable to deliver the 5% serviced site provision, on sites of 50 dwellings or more 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).</p> <p><b>Policy H5(g) Community Land Trusts</b> Persimmon Homes object to the wording of this policy. Community Land Trusts 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><b>Policy H7 &amp; OSL8 Infrastructure and Open Space provision</b> These policies refer to the delivery of infrastructure in tandem with the delivery of housing development to ensure that no unacceptable demand is placed on the physical and social infrastructure of the town. Persimmon Homes contend that the allocation of the land north of Addington as a reserve site, in the Neighbourhood Plan, would allow the forward planning of infrastructure delivery to ensure that this was not a restriction to the delivery of any future scheme. Furthermore, the round Liskeard Trail extension and "Roundbury Park" would be given certainty if the land subject of these representations were allocated as a reserve site.</p> <p>With respect to the mapping set out within the Neighbourhood Plan, Persimmon Homes would make reference to our recent discussions with Mr Stephen Vinson of the Town Council and our suggestion that the proposals map should identify the pertinent policies associated with each of the proposed uses. For example, the delivery of the round Liskeard Trail extension and Roundbury Park (Project 7 saved policy Alt15 of the former Caradon Local Plan) would be more easily identified if they were demarcated on the proposals plan. In addition the allocations at Tencreek , Charter Way, Addington and Woodgate would be more easily identifiable if referenced.</p> <p><b>Policy OSL1 Green Spaces</b> It should be noted that Policy OS1 (page 64) references "Roundbury Park" as OSL 15 on the proposals. However, no reference is made to the policy within the Policies and Proposals table but rather reference is made to open space Leisure Project 7. This should be clarified in the table.</p>	<p>D1[5]</p> <p>D1[6]</p> <p>D1[7]</p> <p>D1[8]</p> <p>D1[9]</p>



Comment Received	Reference Look-Up
<p>Persimmon Homes welcome the opportunity to make comments upon the neighbourhood plan and will be keen to work with the council to understand their views in response to these representations</p>	
<p><b><u>Wain Homes</u></b></p> <p>1. Introduction 1.1 Emery Planning is instructed to submit representations to the Liskeard Neighbourhood Plan (hereafter referred to as the ‘LNP’) on behalf of the Wainhomes (South West) Holdings Limited (hereafter referred to as ‘Wainhomes’). Wainhomes has two site specific interests:</p> <ul style="list-style-type: none"> <li>• Land north of Pengover Road (site location plan at EP1)</li> <li>• Land west of Coldstyle Road (site location plan at EP2)</li> </ul> <p>1.2 In summary, we support the production of the LNP, and it is clear that the Neighbourhood Plan Team has made significant strides in its production of the Neighbourhood Plan. In particular we support the proposed allocation of the land at Charter Way / Pengover Road under Policy H4 of the plan. Wainhomes has submitted a planning application at this site, and has worked closely with the Neighbourhood Plan Team to produce a high quality development that responds to local needs.</p> <p>1.3 Notwithstanding our in principle support for the Neighbourhood Plan, we consider that a number of changes are needed to ensure that the plan meets the basic conditions. In particular, we are concerned that the plan does not provide sufficient housing and employment land to meet the Local Plan requirement, that the prioritisation of previously developed land is inconsistent with national planning policy, and that the extension of the AGLV is not justified. We are also promoting the land west of Coldstyle Road for a sustainable urban extension to the north-west of Liskeard, which could make a valuable contribution to the supply of housing and employment land.</p> <p>1.4 Our detailed representations are set out below, under the following key headings:</p> <ol style="list-style-type: none"> <li>2. The Basic Conditions</li> <li>3. National Planning Policy and Guidance</li> <li>4. The Development Plan</li> <li>5. Response to the draft policies</li> <li>6. Summary and conclusions</li> </ol>	<p><b>D2[1]</b></p>

Comment Received	Reference Look-Up
<p>2. The Basic Conditions</p> <p>2.1 The basic conditions are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by Section 38A of the Planning and Compulsory Purchase Act 2004. The basic conditions are:</p> <ol style="list-style-type: none"> <li>a. having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).</li> <li>b. having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order. This applies only to Orders.</li> <li>c. having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order. This applies only to Orders.</li> <li>d. the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.</li> <li>e. the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).</li> <li>f. the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.</li> <li>g. prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).</li> </ol> <p>3. National Planning Policy and Guidance National Planning Policy Framework (NPPF)</p> <p>3.1 The NPPF was adopted in March 2012. It sets out the Government’s planning policies for England and how these are expected to be applied. The purpose of the planning system is to contribute to the achievement of sustainable development. The policies in paragraphs 18 to 219 of the NPPF, taken as a whole, constitute the Government’s view of what sustainable development in England means in practice for the planning system.</p> <p>3.2 Paragraph 14 of the NPPF sets out the presumption in favour of sustainable development, which is the golden thread running through both plan-making and decision-taking. For plan-making this means that:</p> <ul style="list-style-type: none"> <li>• local planning authorities should positively seek opportunities to meet the development needs of their area;</li> <li>• Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:</li> <li>• any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or</li> <li>• specific policies in this Framework indicate development should be restricted.</li> </ul>	<p>D2[2]</p>

Comment Received	Reference Look-Up
<p>3.3 Paragraph 16 states that the application of the presumption will have implications for how communities engage in neighbourhood planning. Critically, it will mean that neighbourhoods should:</p> <ul style="list-style-type: none"> <li>• develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development;</li> <li>• plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan; and</li> <li>• identify opportunities to use Neighbourhood Development Orders to enable developments that are consistent with their neighbourhood plan to proceed.</li> </ul> <p>3.4 Paragraph 17 identifies that within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking. All of the principles set out (not repeated here for brevity) are relevant to the neighbourhood plan must be considered.</p> <p>3.5 Paragraph 47 requires that to boost significantly the supply of housing, local planning authorities should:</p> <ul style="list-style-type: none"> <li>• use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;</li> <li>• identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;</li> <li>• identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15;</li> <li>• for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target; and</li> <li>• set out their own approach to housing density to reflect local circumstances.</li> </ul> <p>3.6 Paragraph 49 states that housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites.</p>	

Comment Received	Reference Look-Up
<p>3.7 Paragraph 156 requires local planning authorities to set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:</p> <ul style="list-style-type: none"> <li>• the homes and jobs needed in the area;</li> <li>• the provision of retail, leisure and other commercial development;</li> <li>• the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);</li> <li>• the provision of health, security, community and cultural infrastructure and other local facilities; and</li> <li>• climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.</li> </ul> <p>3.8 Paragraph 159 states that local planning authorities should have a clear understanding of housing needs in their area. They should:</p> <ul style="list-style-type: none"> <li>• prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:</li> <li>• meets household and population projections, taking account of migration and demographic change;</li> <li>• addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and</li> <li>• caters for housing demand and the scale of housing supply necessary to meet this demand;</li> <li>• prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.</li> </ul> <p>3.9 Paragraph 184 states that Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan. To facilitate this, local planning authorities should set out clearly their strategic policies for the area and ensure that an up-to-date Local Plan is in place as quickly as possible. [our emphasis]</p> <p>3.10 Paragraph 198 sets out that where a Neighbourhood Development Order has been made, a planning application is not required for development that is within the terms of the order. Where a planning application conflicts with a neighbourhood plan that has been brought into force, planning permission should not normally be granted. National Planning Practice Guidance (PPG)</p> <p>3.11 The PPG was launched in March 2014. It replaced a number of practice guidance documents that were deleted when the PPG was published.</p> <p>3.12 The Government’s guidance sets out the correct sequence of events in neighbourhood plan preparation set out at Paragraph: 080 Reference ID: 41-080-20140306 A summary of the key stages in neighbourhood planning which provides (so far as relevant) and subsequent PPG paragraphs:</p>	

Comment Received	Reference Look-Up
<p>“Step 1: Designating neighbourhood area and if appropriate neighbourhood forum ...  Step 2: Preparing a draft neighbourhood plan or Order Qualifying body develops proposals (advised or assisted by the local planning authority)  •gather baseline information and evidence  •engage and consult those living and working in the neighbourhood area and those with an interest in or affected by the proposals (e.g. service providers) •talk to land owners and the development industry  •identify and assess options  •determine whether European Directives might apply  •start to prepare proposals documents e.g. basic conditions statement  Step 3: Pre-submission publicity &amp; consultation The qualifying body: •publicises the draft plan or Order and invites representations  •consults the consultation bodies as appropriate  •sends a copy of the draft plan or Order to the local planning authority •where European Obligations apply, complies with relevant publicity and consultation requirements  •considers consultation responses and amends plan / Order if appropriate •prepares consultation statement and other proposal documents”  Step 4: Submission of a neighbourhood plan or Order proposal to the local planning authority  •Qualifying body submits the plan or Order proposal to the local planning authority  •Local planning authority checks that submitted proposal complies with all relevant legislation  •If the local planning authority finds that the plan or order meets the legal requirements it: ◦publicises the proposal for minimum 6 weeks and invites representations ◦notifies consultation bodies referred to in the consultation statement ◦appoints an independent examiner (with the agreement of the qualifying body)...”</p> <p>3.13 Paragraph: 001 Reference ID: 41-001-20140306 What is neighbourhood planning? provides (so far as relevant): “...Neighbourhood planning provides a powerful set of tools for local people to ensure that they get the right types of development for their community where the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider local area.”</p> <p>3.14 Paragraph: 003 Reference ID: 41-003-20140306 What are the benefits to a community of developing a neighbourhood plan or Order? provides: “...Neighbourhood planning provides the opportunity for communities to set out a positive vision for how they want their community to develop over the next ten, fifteen, twenty years in ways that meet identified local need and make sense for local people. They can put in place planning policies that will help deliver that vision or grant planning permission for the development they want to see....”</p>	

Comment Received	Reference Look-Up
<p>3.15 Paragraph: 004 Reference ID: 41-004-20140306 What should a Neighbourhood Plan address? provides: "...A neighbourhood plan should support the strategic development needs set out in the Local Plan and plan positively to support local development (as outlined in paragraph 16 of the National Planning Policy Framework.)"</p> <p>3.16 Paragraph: 007 Reference ID: 41-007-20140306 What weight can be attached to an emerging neighbourhood plan when determining planning applications? provides: "...The consultation statement submitted with the draft neighbourhood plan should reveal the quality and effectiveness of the consultation that has informed the plan proposals...."</p> <p>3.17 Paragraph: 009 Reference ID: 41-009-20140306 Can a Neighbourhood Plan come forward before an up-to-date Local Plan is in place? provides: "...Where a neighbourhood plan is brought forward before an up-to-date Local Plan is in place the qualifying body and the local planning authority should discuss and aim to agree the relationship between policies in: the emerging neighbourhood plan the emerging Local Plan the adopted development plan with appropriate regard to national policy and guidance. The local planning authority should take a proactive and positive approach, working collaboratively with a qualifying body particularly sharing evidence and seeking to resolve any issues to ensure the draft neighbourhood plan has the greatest chance of success at independent examination. The local planning authority should work with the qualifying body to produce complementary neighbourhood and Local Plans...."</p> <p>3.18 Paragraph: 040 Reference ID: 41-040-20140306 What evidence is needed to support a neighbourhood plan or Order? provides: "While there are prescribed documents that must be submitted with a neighbourhood plan or Order there is no 'tick box' list of evidence required for neighbourhood planning. Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan or the proposals in an Order. A local planning authority should share relevant evidence, including that gathered to support its own plan-making, with a qualifying body. Further details of the type of evidence supporting a Local Plan can be found here Local Plan."</p> <p>3.19 Paragraph: 041 Reference ID: 41-041-20140306 How should the policies in a neighbourhood plan be drafted? provides: "A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared."</p> <p>3.20 Paragraph: 042 Reference ID: 41-042-20140306 Can a neighbourhood plan allocate sites for development? provides: "A neighbourhood plan can allocate sites for development. A qualifying body should carry out an appraisal of options and an assessment of individual sites against clearly</p>	

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<p>identified criteria. Guidance on assessing sites and on viability can be found here and here.” [These link to PPG, Housing and economic land availability assessment and Viability]</p> <p>3.21 Paragraph: 043 Reference ID: 41-043-20140306 What if a local planning authority is also intending to allocate sites in the same neighbourhood area? provides: “If a local planning authority is also intending to allocate sites in the same neighbourhood area the local planning authority should avoid duplicating planning processes that will apply to the neighbourhood area. It should work constructively with a qualifying body to enable a neighbourhood plan to make timely progress. A local planning authority should share evidence with those preparing the neighbourhood plan, in order for example, that every effort can be made to meet identified local need through the neighbourhood planning process.”</p> <p>3.22 Paragraph: 047 Reference ID: 41-047-20140306 What is the role of the wider community in neighbourhood planning? provides: “A qualifying body should be inclusive and open in the preparation of its neighbourhood plan or Order and ensure that the wider community: is kept fully informed of what is being proposed is able to make their views known throughout the process has opportunities to be actively involved in shaping the emerging neighbourhood plan or Order is made aware of how their views have informed the draft neighbourhood plan or Order.”</p> <p>3.23 Paragraph: 048 Reference ID: 41-048-20140306 Should other public bodies, landowners and the development industry be involved in preparing a draft neighbourhood plan or Order? provides: “A qualifying body must consult any of the consultation bodies whose interest it considers may be affected by the draft neighbourhood plan or Order proposal. The consultation bodies are set out in Schedule 1 to the Neighbourhood Planning (General) Regulations 2012 (as amended). Other public bodies, landowners and the development industry should be involved in preparing a draft neighbourhood plan or Order. By doing this qualifying bodies will be better placed to produce plans that provide for sustainable development which benefits the local community whilst avoiding placing unrealistic pressures on the cost and deliverability of that development.”</p> <p>3.24 Paragraph: 051 Reference ID: 41-051-20140306 Is additional publicity or consultation required where European directives might apply? provides: “European directives, incorporated into UK law, may apply to a draft neighbourhood plan or Order. Where they do apply a qualifying body must make sure that it also complies with any specific publicity and consultation requirements set out in the relevant legislation. The local planning authority should provide advice on this. The legislation that may be of particular relevance to neighbourhood planning is: •the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended) •the Conservation of Habitats and Species Regulations 2010 (as amended) •the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended) It may be appropriate, and in some cases a requirement, that the statutory environmental bodies English Heritage, the Environment Agency and Natural England be consulted.”</p>	

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<p>3.25 Paragraph: 053 Reference ID: 41-053-20140306 Does the local planning authority consider whether a neighbourhood plan or Order meets the basic conditions when a neighbourhood plan or Order is submitted to it? provides: "...The local planning authority should provide constructive comments on an emerging plan or Order before it is submitted."</p> <p>3.26 Paragraph: 066 Reference ID: 41-066-20140306 When should a qualifying body consider the basic conditions that a neighbourhood plan or Order needs to meet? provides: "Throughout the process of developing a neighbourhood plan or Order a qualifying body should consider how it will demonstrate that its neighbourhood plan or Order will meet the basic conditions that must be met if the plan or order is to be successful at independent examination. The basic conditions statement is likely to be the main way that a qualifying body can seek to demonstrate to the independent examiner that its draft neighbourhood plan or Order meets the basic conditions. A qualifying body is advised to discuss and share early drafts of its basic conditions statement with the local planning authority."</p> <p>3.27 Paragraph: 067 Reference ID: 41-067-20140306 What should a local planning authority do to assist a qualifying body in considering the basic conditions? provides: "A local planning authority should provide constructive comments on the emerging neighbourhood plan or Order proposal prior to submission and discuss the contents of any supporting documents, including the basic conditions statement. If a local planning authority considers that a draft neighbourhood plan or Order may fall short of meeting one or more of the basic conditions they should discuss their concerns with the qualifying body in order that these can be considered before the draft neighbourhood plan or Order is formally submitted to the local planning authority."</p> <p>4. The Development Plan</p> <p>4.1 Neighbourhood Plans must be in general conformity with the strategic policies of the wider local area, which in this instance are set out within Cornwall Local Plan.</p> <p>4.2 The Local Plan was adopted in November 2016. It is not an allocations plan, and therefore the allocation of sites to meet the requirements set out within the Local Plan will be through the emerging Site Allocations DPD or a Neighbourhood Plan. Liskeard is a settlement where allocations will be made through the Neighbourhood Plan.</p> <p>4.3 Policy 2 (Spatial Strategy) sets out the overarching strategy for new developments across Cornwall. It seeks to provide homes and jobs based on the role and function of each place. This also includes the strategic scale growth to be accommodated in our main towns and city where they can best support regeneration as sustainable development.</p>	



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<p>4.4 Policy 2A (Key Targets) sets out the overarching housing requirement for Cornwall and then the proposed distribution across the key towns and community network areas. Part 1 of the policy states that a minimum of 52,500 homes to be delivered at an average rate of about 2,625 per year. This requirement does not include the need for gypsy and travellers, student bed spaces or communal establishments. Those are over and above the housing requirement of 52,500.</p> <p>4.5 For Liskeard, the requirement is 1,400 dwellings with a further 1,500 dwellings in the residual of the Liskeard and Looe community network area. The total therefore for the Liskeard and Looe community network area is 2,900.</p> <p>4.6 Policy 3 (Role and Function of Places) sets out the distribution of development according to a settlement hierarchy. Part 1 of the policy is a delivery of strategic scale housing, community, cultural, leisure, retail, utility and employment provision and through a Sites Allocations DPD are neighbourhood plans for the following locations. Liskeard is one of the key locations set out. Part 2 of the policy specifically recognises that development will be at or well related to those named towns and they are to provide an appropriate level of affordable housing in accordance with the requirements of policy 8.</p> <p>4.7 Table 1 sets out the apportionment of local plan housing provision (as at 31st March 2016). For Liskeard this sets out the overall requirement of 1,400. Within that figure, there were 280 completions between 2010 and 2016, 559 dwellings with planning permission not started or under construction, and an allowance has been made for 72 on windfall sites less than 10 dwellings between the period 2021 and 2030. This leaves a residual requirement for 489 dwellings.</p> <p>4.8 Policy 5 (Jobs and Skills) states that flexibility is crucial for the delivery of economic growth to stimulate new jobs and economic growth. This is to be achieved through well integrated provision with our city, towns and villages, be well served by public transport and a scale appropriate to its location.</p> <p>4.9 Table 3 (Local Plan Employment Floorspace Requirements 2010 – 2030) sets out the targets for each community network area, the completions and commitments at 2015. For Liskeard and Looe, it states that there is a need for 20,667m<sup>2</sup> of office space between 2010 and 2030. The table then states that there has been a net loss of 687m<sup>2</sup>, and commitments only total 1,622 m<sup>2</sup>. The residual target is therefore 19,732m<sup>2</sup>.</p> <p>4.10 Table 3 also identifies a need for 23,667m<sup>2</sup> of industrial space between 2010 and 2030. Up to 2016, there has been a net gain of 2,293m<sup>2</sup>, and 6,082m<sup>2</sup> is committed. The residual target is therefore 15,292m<sup>2</sup>.</p>	

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<p>4.11 Policy 6 (Housing Mix) seeks to ensure new developments of 10 dwellings or more should include an appropriate mix of house sizes, type, price and tenure to address identified needs and market demand to support mixed communities.</p> <p>4.12 Policy 7 (Housing in the Countryside) states that additional accommodation to meet housing needs in the open countryside will be permitted where there are special circumstances and development will be restricted to replacement dwellings, subdivision of existing dwellings, reuse of suitably redundant disused or historic buildings or agricultural workers.</p> <p>4.13 Policy 8 (Affordable Housing) states that all new housing schemes where there is a net increase of more than 10 dwellings or where dwellings have a combined gross floorspace more than 1,000m<sup>2</sup> must contribute towards the affordable housing need. Liskeard is located within zone 5 and therefore the affordable housing requirement is 25%.</p> <p>4.14 Policy 13 (Design) states that the council is committed to achieving high quality safe, sustainable and inclusive design in all developments and sets out a number of fundamental design principles.</p> <p>4.15 Policy 14 (Development Standards) seeks to ensure that development achieves the provision of sufficient internal space, public open space, off street parking, a space for the collection of waste recycling, and energy consumption.</p> <p>4.16 Policy 15 seeks to increase the use and production of renewable and low carbon energy generation.</p> <p>4.17 Policy 17 (Health and Wellbeing) seeks to improve the health and wellbeing of Cornwall's communities. This seeks to ensure that development protects and alleviates risk to people and environment from unsafe, unhealthy and polluted environments by avoiding and mitigating against harmful impacts and health risks such as air and noise pollution and water and land contamination.</p> <p>5. Response to draft policies</p> <p>5.1 We support the production of the LNP, and it is clear that the Neighbourhood Plan Team has made significant strides in its production of the Neighbourhood Plan. In particular we support the proposed allocation of the land at Charter Way / Pengover Road under Policy H4 of the plan. Wainhomes has submitted a planning application at this site, and has worked closely with the Neighbourhood Plan Team to produce a high quality design that responds to local needs.</p>	

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<p>5.2 Notwithstanding our in principle support for the Neighbourhood Plan, we consider that a number of changes to specific policies are needed to ensure that the plan meets the basic conditions. We also consider that additional site allocations are needed in order to meet the requirements of the Cornwall Local Plan. We address each policy in turn below.</p> <p>Policy NP1 – Development boundary</p> <p>5.3 The NPPF and the PPG require that the LNP cannot promote less development than set out in the Local Plan or undermine its strategic policies. For the reasons that we set out elsewhere within these representations, we consider that insufficient housing land is identified through this plan to meet development needs to 2030. As such the settlement boundary, which is drawn tightly around the settlement and the proposed allocations, provides no flexibility for additional sites to come forward.</p> <p>5.4 We consider that the approach of the Cornwall Local Plan should be applied; i.e. settlement boundaries should not be set around the key settlements. This provides flexibility for the key settlements to meet future housing needs. Paragraph 2.32, which identifies that Neighbourhood Plans can identify settlement boundaries, is intended to apply to rural locations and villages, is clearly aimed at rural settlements, rather than a key settlement under Policy 3 such as Liskeard.</p> <p>5.5 As such we consider that the approach is inconsistent with the strategic policies of the development plan, and national planning policy.</p> <p>Policy EM1 – Employment and Housing Balance</p> <p>5.6 Wainhomes is supportive of mixed use developments, and indeed the proposed development of land north of Pengover Road would include approximately 1ha of employment land, and the land at Coldstyle Road is promoted as a mixed use development.</p> <p>5.7 However, we do have concerns over a policy approach that requires all residential development of 30 or more dwellings to make financial contributions to cross-subsidising the release of employment land elsewhere within the LNP area. It is not clear how such contributions would comply with the tests set out in the CIL Regulations (122) and paragraph 204 of the Framework. Planning obligations should only be sought where they meet all of the following tests:</p> <ul style="list-style-type: none"> <li>• necessary to make the development acceptable in planning terms;</li> <li>• directly related to the development; and</li> <li>• fairly and reasonably related in scale and kind to the development.</li> </ul>	<p>D2[3]</p> <p>D2[4]</p>

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<p>5.8 Furthermore planning contributions cannot be used to fund private developments or organisations, over which the Neighbourhood Plan Group, Cornwall Council and the developer will have little to no control.</p> <p>5.9 In our view, the key to bringing forward employment land is through the selection of viable and deliverable sites in the right locations. This can be achieved through mixed use developments. The fundamental stumbling block to the delivery of the allocated 11ha at land east of Charter Way (Policy EM2B) has been that it is simply not viable and deliverable; in particular there have been significant land ownership issues. It is not reasonable to expect other developments to fund the resolution of a ransom strip issue.</p> <p>5.10 We therefore recommend that the policy is deleted. However, that is not to say that mixed use developments cannot be encouraged by the LNP, with Wainhomes' proposal at Pengover Road being a good example of how this can be achieved, and we propose a further allocation at Coldstyle Road.</p> <p>Policy EM2A – North of Pengover Road</p> <p>5.11 We support the allocation of 0.93ha of employment land north of Pengover Road. This site is being promoted by Wainhomes and is currently subject to a planning application. This includes 0.93ha of commercial uses (A1, B1&amp; A3). However please note that following comments made at Cornwall Council's planning committee in December and the Design Review Panel in early January, the proposed layout for the application has been revised. Consequently the precise boundaries and access arrangements for the commercial land has been slightly altered. For reference a copy of the revised layout is appended at EP3. Wainhomes' will be submitting the revised plans to Cornwall Council on the 1st February. We consider that the boundaries of the commercial allocation should also be revised in the LNP, to reflect the final layout.</p> <p>5.12 Notwithstanding our in principle support, we do have a number of concerns in relation to the policy. The policy as drafted requires all 0.93ha of commercial land to be for use classes B1, B2, and B8 only. As set out above, the planning application includes a small element of A1 and A3 uses. Such provision is fully justified as part of a mixed development complementing the surrounding land uses, and was supported by the Council in its committee report of December 2016. We therefore consider that allowance should be made within the policy for an element of A1 and A3 retail uses on the site.</p> <p>5.13 The draft policy also requires the site to take access from Clemo Road Industrial Estate. This is not necessary, as safe and suitable access can be taken directly from Charter Way, as demonstrated by the Transport Assessment supporting the planning application. We also note that the Council's highways officers have not raised any objection to the application including taking access from Charter Way.</p>	<p>D2[5]</p>



Comment Received	Reference Look-Up
<p>Policy H1 - Meeting the housing requirements of the Cornwall Local Plan to 2030</p> <p>5.21 We support the proposal to meet the requirement set out within the Local Plan of 1,400 dwellings. We would add that to fully reflect the Local Plan, the policy should be expressed as a net figure, and also as a minimum.</p> <p>Policy H2 - Brownfield land first</p> <p>5.22 The proposed policy approach of ‘brownfield first’ is inconsistent with the Framework, which seeks to ‘encourage’ rather than ‘prioritise’ the development of previously developed land. The issue has arisen in numerous Local Plan examinations, but is probably best summarised in the Secretary of State appeal decision for Burgess Farm, Salford, which was issued shortly following the publication of the Framework (appeal ref: APP/U4230/A/11/2157433). Paragraph 14 of the decision letter clarifies the Secretary of State’s position: “He gives less weight to the sequential approach to release of sites. National planning policy in the Framework encourages the use of previously developed land, but does not promote a sequential approach to land use. It stresses the importance of achieving sustainable development to meet identified needs.”</p> <p>5.23 The proposed policy approach is also inconsistent with the Framework’s requirement to maintain a 5 year supply of housing land. The policy seeks to prevent the release of greenfield sites unless a certain number of previously developed sites have commenced development. However such an approach is counter-intuitive, as if sites identified within the supply have failed to commence then additional sites will need to come forward.</p> <p>5.24 In relation to the specific sites that have been identified, the quantum of windfall development on sites of less than 10 dwellings has already been established through the Core Strategy. However in relation to the capacity from sites of 10 dwellings or more, it is not clear whether a realistic assessment has been made as to whether there is a reasonable prospect of the sites delivering within the plan period. Whilst we note that a 30% discount has been applied, the discount has not been fully evidenced, and in any event is not an adequate replacement for assessing whether larger sites are developable.</p> <p>Policy H3 – Employment and housing balance</p> <p>5.25 We refer to our response to Policy EM1. We support the principle of providing mixed use developments, and indeed Wainhomes amended their application on land north of Pengover Road to include additional employment land at the request of the Town Council. However we would question whether the proposed policy requirement to cross-subsidise employment development meets the tests of the CIL Regulations (122) and paragraph 204 of the Framework. Where employment land is provided as part of a mixed-use development, the correct approach would be to market the land, and this would form part of the Section 106 agreement for Wainhomes’ application on land north of Pengover Road.</p>	<p><b>D2[8]</b></p> <p><b>D2[9]</b></p> <p><b>D2[10]</b></p>

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<p>Policy H4 – Allocation at Charter Way / Pengover Road</p> <p>5.26 We strongly support the proposed allocation. Wainhomes is currently advancing a planning application on the site (LPA ref: PA15/09731), which it is hoped will be approved early this year. The application has been amended to accommodate feedback from the Town Council, who following the amendments have confirmed in principle support for the land uses proposed. Supporting technical information relating to the site has been submitted in support of the planning application.</p> <p>5.27 The site is viable and deliverable, and Wainhomes intend to develop the site as quickly as possible following granting of planning permission.</p>	<p><b>D2[11]</b></p>
<p>Policy H5 - Ensuring housing delivery to meet the target up to 2030</p> <p>5.28 The policy refers to a trajectory, but no trajectory is set out within the plan. It also refers to a ‘three year moving average’, which appears to be proposed to assess actual delivery against the trajectory, but the policy initially refers to a demonstration of deliverability, which we assume is in relation to future supply. Further clarification is required in relation to the proposed policy. Notwithstanding, from our initial understanding of the policy we do have some concerns that the proposed monitoring approach seems to defer from standard practice, which would be an assessment of the future supply against the residual requirement.</p> <p>5.29 It should be noted that whilst the requirement is 1,400 dwellings for the period 2010-2030, only 280 dwellings were completed up to 2016. There should have been 420 completions during that period if a steady trajectory was to be maintained. The Framework is clear on the need to boost significantly the supply of housing land, and this means addressing any shortfall that has arisen as early as possible. We support the uplift in delivery that the LNP is seeking to achieve in order to meet the overall requirement in full.</p> <p>5.30 The policy continues to state that extensions of appropriate scale to the area, beyond the development boundary set in Policy NP1 may be permitted if they comply with a number of criteria. In our view the correct approach is to apply the presumption in favour of sustainable development set out within the Framework; i.e. planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.</p> <p>5.31 One of the criteria requires the extension to accord with the LNP’s assessment ranking in terms of sustainability and suitability, which is a cross-reference to the LNP housing report . This is effectively a Sustainability Assessment process, which is a legal requirement of plan making. However numerical ranking exercises, which are not based upon specific schemes or mitigation, are not an adequate replacement for the traditional planning</p>	<p><b>D2[12]</b></p>

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<p>balance exercise. If there is a shortfall in housing land supply, applications need to be considered on their own merits, having regard to their compliance with the development plan and any other material considerations. The site assessments may be a material consideration, but the policy should not set out a fixed sequential approach.</p> <p>5.32 The draft policy also requires the provision of serviced land for self-build plots, and land for a community land trust. Neither requirement accords with the Local Plan. In fact the requirement to provide self-build plots on large sites was considered at the recent examination of the Local Plan, and expressly rejected by the Inspector.</p> <p>Policy H7 – Infrastructure</p> <p>5.33 The draft policy refers to the ‘delivery plan’, but the delivery plan set out at page 85 of the plan does not provide any further clarity. It is also unclear how this links to Policy DP1. The supporting text to the policy refers to the Infrastructure Report, but it is not clear which items within the report require planning contributions. It is apparent that a number of the items referred to within the Infrastructure Report could not be subject to planning contributions that meet the tests of CIL and paragraph 204 of the Framework. As such further clarification is required.</p> <p>Policy H8 - Redressing the imbalance in housing tenure, size and mix</p> <p>5.34 Wainhomes does not object to the principle of providing a mix of dwellings on larger developments, and indeed this is something that they actively seek to achieve. For example on the proposed development on land north of Pengover Road, the proposed mix (revised following comments made at December’s planning committee and the early January Design Review Panel) is: • 9 x 1 bedroom flats • 39 x 2 bedroom • 92 x 3 bedroom • 67 x 4 bedroom</p> <p>5.35 The proposed development would therefore comprise 32% of 4 bedroom dwellings, plus smaller accommodation suitable for 1 and 2 person households. Furthermore 25% of dwellings would be delivered as affordable housing, including a proportion of 3 and 4 bedroom dwellings.</p> <p>5.36 We would suggest 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. Market demand is also specifically referred to in Policy 6 of the Local Plan.</p> <p>Policy H10 – General design principles</p>	<p><b>D2[13]</b></p> <p><b>D2[14]</b></p> <p><b>D2[15]</b></p>



Comment Received	Reference Look-Up
<p>5.37 We support the draft policy. Wainhomes has a commitment to delivering high quality design, and the draft policy would appear to be an appropriate basis upon which to achieve that.</p> <p>Policy TC2 - Impact assessment of retail developments</p> <p>5.38 We consider that the proposed threshold for impact assessments of 200m<sup>2</sup> is too low. The national standard set out in the Framework is 2,500m<sup>2</sup>. We 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.</p> <p>Policy OSL3 - Play provision in neighbourhood areas</p> <p>5.39 The general emphasis of the policy is supported. However the table setting out the play area requirements is based upon dwellings numbers, rather than the number of prospective residents upon which an assessment is usually made. Notwithstanding, in our experience, a LAP is unlikely to be required on a development of less than 10 dwellings, and a LEAP is unlikely to be required for less than 30 dwellings.</p> <p>Policy OSL5 - Open space and developer contributions</p> <p>5.40 In order to meet the CIL Regulations (122), the policy should be amended to clarify that contributions will be sought specifically whereby a need to extend or improve existing facilities arises as a direct result of the proposed development. Contributions should not be sought towards the maintenance of existing facilities, as this can reasonably be expected to be funded through other sources.</p> <p>5.41 The draft policy requires on-site open space must be laid out prior to occupation of 75% of dwellings in any phase, and off-site contributions to be paid prior to occupation of 50% of dwellings. We consider that such details can be addressed through Section 106 agreements, and different timescales may be suitable depending upon the scale and nature of the proposed development, also taking into account issues such as the delivery of other planning contributions and viability.</p> <p>Policy OSL10 - Area of Local Landscape and Heritage Value</p> <p>5.42 We object to Policy OSL10. The Policy states: “The area between the development limit and the Caradon AGLV, (CL8 &amp; 9 saved policies), is designated as an area of local landscape and heritage value with a view to future redesignation as an extension to the area of great landscape value.”</p>	<p><b>D2[16]</b></p> <p><b>D2[17]</b></p> <p><b>D2[18]</b></p> <p><b>D2[19]</b></p>

Comment Received	Reference Look-Up
<p>5.43 The proposed designation is not supported by a robust evidence base. The justification text for the policy is actually explicit that insufficient assessment has been made within existing evidence documents, and suggests a need for further studies. It does not appear that any further studies have taken place. Whilst the supporting text states that “Liskeard people see this area as a valuable local resource”, this is not a professionally informed assessment, nor necessarily representative of the total population. In fact the limited evidence available actually contradicts the proposed designation / AGLV extension. The land forms a different historic landscape character area to the wider AGLV; the extension area comprises post medieval enclosed land, whereas the existing AGLV at this point comprises medieval farmland .</p> <p>5.44 Without the evidence base required, the policy approach to creating a new landscape designation and/or extending the AGLV does not have regard to the Framework, in particular, paragraph 113 which requires distinction between the hierarchy of designated landscape areas, so that protection is commensurate with their status.</p> <p>5.45 The supporting text refers to paragraph 123 of the Framework. It should be noted that this paragraph relates to noise considerations rather than landscape designations. It could be said that this applies to any area of countryside; however it is of little relevance to the AGLV or indeed an area of ‘local landscape and heritage value’.</p> <p>5.46 The effect of extending the AGLV to the border of the settlement would be highly restrictive, effectively stymieing any potential flexibility in terms of meeting future development needs within this plan period or indeed the next. Liskeard is a broadly triangular settlement with three main options for growth: south, east and north-west. The south is highly constrained by the A38, which forms a strong boundary to the south of the settlement. Options for growth to the east have been exhausted through the proposed developments at Pengover Road, Charter Way and Tencreek Farm. These developments will or are likely to feature significant landscaping to their eastern boundaries, as demonstrated in the proposed Pengover Road application. Therefore the only realistic option for accommodating future growth is to the north-west of the settlement. However the proposed landscape designation would effectively restrict any growth in this direction.</p> <p>5.47 Taking into account the above, and with reference to the proposals map at page 92 of the draft plan, if the landscape designation is taken forward we cannot see any logical future options for growth. This outcome would be a highly inappropriate outcome for Liskeard, which is identified within the Local Plan as a key settlement for growth. There is no reason to believe that role of the settlement will change moving forward.</p> <p>5.48 We therefore conclude that the proposed designation would severely restrict any future development outside of the existing settlement boundaries, aside from the limited development allowed for within the specified exceptions list. This would clearly rule out new housing, employment or retail developments beyond the existing settlement boundaries. Even if it were to be accepted that there is not a need for additional land to 2030, it is not clear how future development needs beyond 2030 will be met without breaching the proposed landscape area.</p>	

Comment Received	Reference Look-Up
<p>5.49 To conclude, the 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. 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>Policy SUS1 – Sustainable development standards</p> <p>5.50 Wainhomes is supportive of the principles of the policy, and already incorporates many of the requirements into its development. However further 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.,</p> <p>6. Proposed allocation – Land west of Coldstyle Road The site</p> <p>6.1 Wainhomes is promoting the land at Coldstyle Road for mixed use development. A plan showing land under their control is appended at EP2. The site is referred to as HE13 in the housing report .</p> <p>6.2 The site comprises 17.6ha in total, although only approximately 10ha is proposed as an allocation at this stage. The site is capable of accommodating a mixed use development of approximately 150 dwellings and 5ha of employment land. An initial masterplan is appended at EP4.</p> <p>6.3 The site is under the control of Wainhomes and could come forward in the short term for development. It is viable and deliverable.</p> <p>6.4 We consider that the allocation of the site can be justified on the basis of the need to provide flexibility in meeting the housing requirement, which is a minimum figure, and to deliver employment land. These matters are considered further below.</p> <p>Housing requirement and flexibility</p> <p>6.5 The Local Plan requires a minimum of 1,400 net additional dwellings for Liskeard. Within that figure, there were 280 completions between 2010 and 2016, 559 dwellings with planning permission not started or under construction, and an allowance has been made for 72 on windfall sites less</p>	<p><b>D2[20]</b></p> <p><b>D2[21]</b></p>

Comment Received	Reference Look-Up
<p>than 10 dwellings between the period 2021 and 2030. This leaves a residual requirement for 489 dwellings. The LNP seeks to address that shortfall through additional sources of housing land supply, namely:</p> <ul style="list-style-type: none"> <li>• 315 dwellings from additional permissions since April 2016. This comprises 275 units at Tencreek Farm (LPA ref: PA15/09821) and 40 units at land north of Woodgate Road (LPA ref: PA16/01434).</li> <li>• 207 dwellings on the land north of Pengover Road (Policy H4). We strongly support this proposed allocation.</li> <li>• 90 dwellings on previously developed sites of 10 dwellings or more (Policy H2).</li> </ul> <p>6.6 We therefore calculate that a total supply of 1,523 units has been identified, although we note that the Council's figures are slightly different (1,532). We have raised some concern in our response to Policy H2 of the lack of evidence in relation to the 90 dwellings on previously developed sites of 10 dwellings or more. If these units were discounted the supply would reduce to 1,433 units. Depending upon which figure is taken, this represents a flexibility factor of 9% or 2%. Even on the higher figure of 9%, we consider that provides insufficient flexibility to respond to rapid change (i.e. potential slippage in the delivery of housing from identified sites) as required by paragraph 14 of the Framework.</p> <p>6.7 The Local Plans Expert Group published its report to the Communities Secretary and to the Minister of Housing and Planning in March 2016. Paragraph 11.2 of the report identifies that particular problems currently occur with identifying and maintaining a five year supply of housing land. Consequently the report recommends at paragraph 11.4 that the Framework should make clear that local plans should be required not only to demonstrate a five year land supply but also focus on ensuring a more effective supply of developable land for the medium to long term (over the whole plan period), plus make provision for, and provide a mechanism for the release of, developable Reserve Sites equivalent to 20% of their housing requirement, as far as is consistent with the policies set out in the Framework. Reserve Sites represent land that can be brought forward to respond to changes in circumstances.</p> <p>6.8 At present the recommendations of the Group are just that; recommendations. However their conclusions reflect precisely the concerns that we have in respect of the LNP. Anything more than 8% slippage from the identified sites could result in the housing requirement not being met. We therefore consider that a much higher flexibility allowance is required, in the order of 20%. This would give a reasonable degree of security that should sites not deliver at the rates anticipated, a 5 year housing land supply could still be maintained. As such, the land at Coldstyle Road could be allocated, or in the alternative identified as a reserve site, to provide the plan with the necessary flexibility to respond to rapid change.</p> <p>Employment land</p> <p>6.9 The LNP has identified an imbalance between housing and employment growth. The issues date back to the Caradon Local Plan, and the failure of the allocation at Charter Way to deliver.</p>	

Comment Received	Reference Look-Up
<p>6.10 In our responses to policies EM2B and EM3, we have significant doubts as to whether the identified allocations for employment development have a reasonable prospect of coming forward. The land at Charter Way has been allocated for a considerable period of time, but the LNP evidence base acknowledges significant issues over deliverability, notably the presence of a ransom strip affecting the site access. It is not clear whether Bolitho Farm is being actively promoted, whether there is agreement with Menheniot Parish Council, and furthermore whether the site is deliverable with no technical constraints.</p> <p>6.11 The land at Coldstyle Road could deliver approximately 5ha of employment land as part of a mixed use development. The site is being promoted by Wainhomes and has been subject to initial masterplan work, as set out at appendix EP4. Unlike the other sites put forward in the plan, in particular the land at Charter Way which is known to be not deliverable, the site is capable of coming forward during the plan period.</p> <p>7. Summary and conclusions 7</p> <p>.1 We support the production of the LNP, and it is clear that the Neighbourhood Plan Team has made significant strides in its production of the Neighbourhood Plan. In particular we support the proposed allocation of the land at Charter Way / Pengover Road under Policy H4 of the plan. Wainhomes has submitted a planning application at this site, and has worked closely with the Town Council to produce a high quality development that responds to local needs.</p> <p>7.2 Notwithstanding our in principle support for the Neighbourhood Plan, we consider that a number of changes are needed to ensure that the plan meets the basic conditions. In particular, we are concerned that the plan does not provide sufficient housing and employment land to meet the Local Plan requirement, that the prioritisation of previously developed land is inconsistent with national planning policy, and that the extension of the AGLV is not justified.</p> <p>7.3 We are also promoting the land west of Coldstyle Road for a sustainable urban extension to the north-west of Liskeard, which could make a valuable contribution to the supply of housing and employment land through a mixed use development.</p> <p>8. Appendices EP1. Site location plan - Land north of Pengover Road EP2. Site location plan - Land west of Coldstyle Road EP3. Revised detailed layout plan - Land north of Pengover Road EP4. Initial masterplan - Land west of Coldstyle Road</p>	
<p><b><u>M G Roberts Preliminary Planning Professionals Ltd</u></b></p> <p>Policy NP1-We think "Development Boundary" should include land at Woodgate Road</p>	<p>D3[1]</p>

Comment Received	Reference Look-Up
<p>Policy EM1 &amp; H3- These Policies both say the same thing so both are not needed. However we believe the concept of this policy is flawed from the following reasons.</p> <p>1. The idea of provision of employment land and residential housing on the same site is bad planning. As recognised in Policy EM2 there is a need for B2 General Industry (a use that cannot be accommodated near to residential development) as well as B1 Light Industry (a use which can be accommodated close to residential development) and B8 Warehousing and Distribution (a use that cannot be accommodated near to residential development). The policy could therefore lead to an excess of B1 light industrial sites .</p> <p>2. Residential development schemes for over 30 houses will already need to make provision for 25% affordable housing as the town falls within zone 5 under the provisions of Policy 8 of the Adopted Cornwall Plan in addition to public open space provision and contributions, education contributions , possibly highway contributions and ecological mitigation contributions. These existing requirements can already impact on scheme viability or produce site valuations to unattractive to landowners lacking in non-availability of development 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>Policy H1- We support this policy.</p> <p>Policy H5- We support the general thrust of this policy. However we have concerns, for the same reasons as set out above, in relation to section b: in question what benefit will arise from section g: of the policy.</p> <p>Policy H7, Policy OSL5, Policy OSL6 &amp; Policy OSL11A- We believe that these policies will refer to contributions which should fall within the CIL Regulations and they these policies should be formatted in the plan rather than seeking 106 contributions from individual developments.</p> <p>Policy OSL7- Following the planning approval for affordable 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.</p>	<p><b>D3[2]</b></p> <p><b>D3[3]</b></p> <p><b>D3[4]</b></p> <p><b>D3[5]</b></p> <p><b>D3[6]</b></p>
<p><b><u>Darkes</u></b>  We support the objective in the Liskeard Neighbourhood Plan to bring forward employment on the site described as East of Charter Way, referred to in Policy EM 2b, and would like to see this happen, as it has been talked about for many years. 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.</p>	<p><b>D4</b></p>

Comment Received	Reference Look-Up
Wilton Homes – Non received	
Linden Homes South West – Non Received	
Ivan Tomlin – Non Received	
Pearce Fine Homes – None received	
AHT Design – None received	
David Pierce – None received	

**Appendix E Comments by Cornwall Council Officers**

Comment Received	Reference Look-Up
<u>Strategic framework</u> The Cornwall Local Plan: Strategic Policies is now adopted and so reference to the former Caradon Local Plan should be updated (p16.) On page 43 the NDP refers to the Cornwall Structure Plan, in error.	<b>E1[1], E1[2]</b>

Comment Received	Reference Look-Up
<p><u>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.</p>	E2
<p><u>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. However, the NDP is not able to insist on brownfield delivery first and Policy H2 should be removed.</p>	E3[1], E3[2]
<p><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 if that area is allocated in Menheniot's NDP, but their plan has not reached that stage.</p>	E4
<p><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. It is also hard to tell whether some of the green space designations referred to extend beyond the NDP area.</p>	E5
<p><u>Developer contributions</u>            Infrastructure required to make a development acceptable in planning terms will continue to be sought via planning obligations/S106 agreements, even after CIL is adopted.</p>	E6
<p>In development of the CIL, Cornwall Council needs to distinguish between what S106 will be collected for, and what CIL income will be used to fund. This is so that developers can be clear that they are not being asked to pay for the same thing via two different routes. Cornwall Council is currently in the process of developing a list of infrastructure types/projects which officers believe would be more appropriate to be funded via CIL than a planning obligation. This list will be available for public consultation when we consult on the Draft Charging Schedule (currently timetabled for spring 2017).</p>	E7



Comment Received	Reference Look-Up
<p>Liskeard is in zone 5, which means development will not generate local CIL receipts, but the NDP can still identify priority projects for its area. 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.</p>	
<p>Transport Issues - Connecting Cornwall: 2030 is the third Local Transport Plan for Cornwall and sets out a 20 year transport vision which supports economic prosperity and a move towards more sustainable travel, with less reliance on the private car: the intention being to encourage vibrant, accessible and safe town environments providing strong links between communities, both in Cornwall and beyond.</p> <p>The Transport Strategies have been developed based on a solid, clear evidence base and in liaison with key stakeholders and reflect the Local Plan period up to 2030. As part of this a Town Transport Strategy for Liskeard has been developed.</p> <p>The Strategies identify and cost the transport measures required to support housing and employment growth. In order to fund the delivery of the strategies the Council will seek to support the delivery of the critical elements, but collection of proportional contributions from developers is vital, to ensure appropriate mitigation is put in place to overcome the cumulative impact of new developments across the towns. Trip rates have calculated and applied dependent on the scale of individual developments, this will ensure that the developer will be paying a fair and proportional contribution to strategic transport measures, alongside any public funding that may be available.</p> <p>While the Transport Strategies identify the key junction and highways improvements required to support Local Plan targets, it is recognised that modal shift is required in order to accommodate sustainable future growth. Walking, cycling and public transport infrastructure is therefore a key element of the strategies and for each town a level of modal shift has been built into the strategy.</p> <p>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.</p>	E5
<p>EM1 – EM8 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.</p>	E6
<p>EM1: 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 allocated and have not come forward, so provision of land does not seem to be the issue.</p>	E7

Comment Received	Reference Look-Up
EM3: This cannot be a policy. Could be referred to in supporting text, but cannot have a policy which operates outside the NDP area.	<b>E11</b>
EM4: Part of Moorswater estate is also outside the NDP area.	<b>E12</b>
EM5: 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.	<b>E13</b>
EM6: where policies refer to a site this should be shown on a clear map (eg Liskeard School)	<b>E14</b>
EM7: 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.	<b>E15</b>
EM8: 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. The additional criteria relating to the conversion of listed buildings are covered by strategic policy.	<b>E16[1]</b> <b>E16[2]</b>
H1 – H8 Supportive of improved access to the town centre and neighbourhood facilities by walking, cycling and public transport improvements as part of new development	<b>E17</b>
H1: this is an objective, but not a policy – recommend removal	<b>E18</b>
H2: cannot require brownfield land to be developed first – remove this policy	<b>E3[2]</b>
H3: as with policy EM1, this cross subsidy is not reasonably related to housing development. Recommend removal.	<b>E19</b>
H4: this site has planning approval - not an allocation. Delete.	<b>E20</b>
H5. 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?	<b>E21</b>

Comment Received	Reference Look-Up
Objective 6 "...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.	<b>E22</b>
H7: this is covered by strategic policy, CLP Policy 28: Infrastructure (see general comments on developer contributions)	<b>E23</b>
<p>H8: 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.</p> <p>Policy H8 c and d. A condition should be applied to all domestic property 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.</p>	<p><b>E24[1]</b></p> <p><b>E24[2]</b></p>
H10: repeats strategic policy (CLP Policy 12: Design) and does not add any local detail; delete to avoid repetition	<b>E25</b>
A Place to meet, shop and do business. 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?	<b>E26</b>
TC1: needs a detailed/ large scale map to identify sites. This is another policy which repeats some elements of strategic Policy. It may be clearer to delete these elements, so that more emphasis is given to the specific local requirements.	<b>E27[1], E27[2]</b>
TC2: as 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?	<b>E28</b>
TC4: again, specify whether all the criteria must be met. Include a large scale map of the site.	<b>E29</b>
TC6: 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?	<b>E30</b>
TC7: this could be a project or an objective, but is not reasonable as a policy – not clearly related to development. Recommend deletion.	<b>E31</b>
TC8-10 The town centre map could be at a larger scale, for clarity.	

Comment Received	Reference Look-Up
TC11: refer to locally listed buildings as ‘non designated heritage assets’ Identify them more clearly on a larger scale map. This in itself is not a policy.	<b>E32[1], E32[2]</b>
TC12: repeats strategic policy (CLP Policy 24: historic environment)	<b>E33</b>
TC13: Some of the proposed works will not require planning permission, the design principles could be better related to policy H10.	<b>E34</b>
OSL 1- 13 Supportive of the policy approach in particular the focus on provision of walking and cycling and public transport links and improvements.	<b>E35</b>
OS1: put the numbers on the map. Page64 lists & numbers green spaces, but there is no annotation on the map on page 94.	<b>E36</b>
<p>OSL3 and 5: see comments from Open Spaces team</p> <p>P65 OSL3 – identifies key sites of Neighbourhood Equipped Areas for Play (NEAP), which are definitions taken from national guidance by the Fields in Trust (FiT). The assessment would all of these. In particular the suggestion of one at Rapsons Park would resolve the existing deficiency in the part of the town to the south of the A38. On page 67 though it is unclear if this is the plan. Whilst it was envisaged that development in this area might be able to introduce an equipped facility actually in this area, the Rapson’s site would be easily accessible via pavements on the Station Road that crosses the A38, and as a key open space for teenage provision already the location would have multiple benefits. Based upon the most recent information it is now evident that the Old Road/Allen Vale area has a deficiency in equipped play (west half of Neighbourhood 5), as the Henscol facility is unsuitable and unsustainable. The policy references ‘natural play facilities’ at Sungirt &amp; Lanchard Woods, with a little further explanation provided on p67. There is not a plan or annotated map. These sorts of sites are often known by different names and quite large, so this would be beneficial to better understand the proposals. Lanchard Woods or the ‘rural edge of town play area’ proposed could potentially serve the deficient western area. Natural open spaces do offer considerable play value, and projects to encourage greater use are to be encouraged, but the problems associated with making new facilities especially for children’s play should not be underestimated. Safety requirements, anti-social behaviour and the protection of vulnerable individuals are some of the reasons that good natural surveillance is essential. Proposals for these woods need to really demonstrate how they will factor these challenges in.</p> <p>P65 – ‘only family dwellings of 2 or more bedrooms will be required to contribute to the provision of children’s play space’. This will make an already very complex system to calculate contributions impractical and out of line with the rest of the county that assumes an overall steady</p>	<p><b>E37[1]</b></p> <p><b>E37[2]</b></p>

Comment Received	Reference Look-Up
occupancy number. Discretion is already given to residential entirely for the elderly, which it is proposed to formalise in the SPD, so this statement is probably overkill.	
P65 – Reference is made to Appendix E – list of excluded open space. Where is this?	E37[3]
<p>The tables (bottom p65 &amp; 66) - generic FiT standards do not accord with Policy 12.3 of the Local Plan. Page 70 shows standards for open space reflecting the work of the strategy adopted in 2014, however some of the figures are incorrect and there has been a mistake in the interpretation of the standards for type 3 outdoor sport – see page 56 of <a href="http://www.cornwall.gov.uk/media/8104587/open-space-strategy-cornwall-towns-2014.pdf">http://www.cornwall.gov.uk/media/8104587/open-space-strategy-cornwall-towns-2014.pdf</a> The inclusion of project proposals for current population and in response to forecast growth is really good and fits well with the OS assessment findings. It will be very helpful to inform section 106 and CIL allocations as well as providing evidence to other funding bodies.</p> <p>The open space strategy above explains the drawbacks in the national open space standards produced by the Fields in Trust, which attempts to apply all of the same standards to inner cities, as to the super wealthy suburbs. The figures given in their <i>Guidance for Outdoor Sport and Play Beyond the Six Acre Standard</i> are intended as benchmarks for areas that have not developed some more appropriate standards of their own, and are in many cases aspirational. With aspirational standards inevitably comes compromise, we have numerous examples in Cornwall, and in the former Caradon area, of how these design decisions end up compromising the quality &amp; usability of the resulting open spaces. The table at the bottom of page 65, which is taken straight from national guidance:*, contradicts the local standards in the table on page 70. The latter provides tools to assess each development on a case by case basis. It enables a greater degree of variance depending on a site’s natural features and the existing access to facilities in the area, and facilitates innovative &amp; bespoke proposals that give areas unique identities, rather than bland replicas. The table (bottom p65) on the other hand implies that Multi-use Games Areas (MUGAs) are the only form of teenage provision and suggests to a developer of 1000 homes that they need only provide the same facility (in size, capacity and value) as a developer providing 201 homes. This is in contrast to page 70, where scale increases per dwelling, and will be confusing for developers and planners alike. The table at the bottom of page 66 will make it much more difficult for developers to also apply a statement on the same page ‘open spaces should ideally be created around existing landscape features on the site and connect to landscape and GI off site...’ The table ignores the latest accessibility standards in the Open Space Strategy, and is retrograde and misleading. Looking at the Local Area for Play (LAP) requirement as an example, this will in reality deliver minute plots between houses, which evidence shows are seldom used and will become drains on the limited maintenance resource. A 10x10 (100sqm) ‘activity zone’ is simply too small to be of any value, and is invariably interpreted poorly by developers. This results in expensive fencing around the ‘100sqm activity zone’, whilst a buffer strip around the 3 sides to private dwellings needs to be a minimum of 200sqm. Consequently two thirds (66%) of the land in such an example is given over to the open space is unusable for children’s ‘activity’. With development land at a premium this is an incredible wasteful use of space. It is puzzling therefore that this NDP, which surely is seeking to establish local policies, would choose national guidance (pages 65 &amp; 66 taken straight from:*)</p>	E38

Comment Received	Reference Look-Up
<p>over a set of standards developed from first principles, tested specifically for Liskeard, and that follow the same basis used for all other towns in Cornwall.</p> <p>*</p> <p><a href="http://www.fieldsintrust.org/Upload/file/PAD/FINAL%20ONLINE%20Planning%20Guidance%20for%20Outdoor%20Sport%20and%20Play%20Provision%20Oct%202015.pdf">http://www.fieldsintrust.org/Upload/file/PAD/FINAL%20ONLINE%20Planning%20Guidance%20for%20Outdoor%20Sport%20and%20Play%20Provision%20Oct%202015.pdf</a></p> <p>I consider these generic FiT standards inappropriate in the NDP, as there are incompatibility issues with Policy 12.3 of the Local Plan and the future Open Space Standards SPD, as they seek to encourage numerous very small spaces instead of larger more multifunctional and quality spaces, which will in fact just short change the communities the NDP is supposed to benefit.</p>	
OSL4: project not policy	<b>E39</b>
P69 – OSL5 para2 – this 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	<b>E40</b>
P71 – Reasoned justification para1. I think they might be using out of date figures. The CC OS Strategy requires 44sqm/person. We will be refreshing this in the coming weeks, and asking the key stakeholders to check current mapping.	<b>E41</b>
OSL6: pooling issue	<b>??</b>
<p>OSL7: 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)</p> <p>P72 – Comment – para1 – this does not accord with government rules imposed on s106, whereby only developments in urban areas of 11 &amp; more can be required to make off-site contributions. It is my understanding that substituting this to a planning condition would not be permissible.</p>	<b>E42</b>
OSL8: 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.	<b>E43</b>
OSL9: streetlights don't require planning permission. Could this be included in design policy?	<b>E44</b>
OSL10: reference to permitted development is confusing	<b>E45</b>

Comment Received	Reference Look-Up
OSL11: not clear on map – not all listed – see also OSL8	E46
SUS1: 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.	E47
SUS2; This isn't a policy – and cannot be required by policy. Move to supporting text.	E48
<p>DP1 is not a policy. See comments about S106 and contributions in general comments section. Parish Councils that have an adopted Neighbourhood Plan will receive 25% of the CIL income raised from development within their area. This is not a minimum figure as suggested in the second paragraph of the 'reasoned justification' on page 85. Guidance does refer to this 25% as being 'uncapped', but this is to distinguish it from the 15% for Parish Councils without an adopted Neighbourhood Plan, which is capped at £100 per dwelling within the Parish.</p> <p>General comments: Infrastructure required to make a development acceptable in planning terms will continue to be sought via planning obligations/S106 agreements, even after CIL is adopted.</p> <p>In development of the CIL, Cornwall Council needs to distinguish between what S106 will be collected for, and what CIL income will be used to fund. This is so that developers can be clear that they are not being asked to pay for the same thing via two different routes. Cornwall Council is currently in the process of developing a list of infrastructure types/projects which officers believe would be more appropriate to be funded via CIL than a planning obligation. This list will be available for public consultation when we consult on the Draft Charging Schedule (currently timetabled for spring 2017).</p> <p>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"> <li>• 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.</li> <li>• Type 5: provision for teenagers – creation or enhancement of formal and equipped areas for teenagers.</li> </ul> <p>This proposal will be subject to consultation, but this is just something for the Parish Council to be aware of for the future.</p>	E49

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