

This report analyses the comments received during formal consultations on the Liskeard Neighbourhood Development Plan from November 2016 to January 2017. It also records the Steering Group and Town Council's response to the comments, and sets out the changes to the Neighbourhood Plan that are proposed for inclusion in the version of the Plan to be submitted to Cornwall Council.

# LISKEARD NEIGHBOURHOOD DEVELOPMENT PLAN REGULATION 14 CONSULTATIONS RESPONSE ANALYSIS

Liskeard Town Council

May 2017



## INTRODUCTION

This report analyses the comments made in response to the formal community and statutory organisation consultations carried out on the Liskeard Neighbourhood Development Plan under Regulation 14 of the Neighbourhood Plan Regulations from November 2016 to January 2017. It also records the Steering Group and Town Council's considered responses to those comments, and sets out the modifications to the Liskeard Neighbourhood Development Plan that are proposed to be made in preparing the submission version of the Plan. These are set out in Tables 1 & 2 which summarise and respond to the various comments made in the order of their appearance in the Plan.

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

## SUMMARY

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

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

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

A Resident of Liskeard



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

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

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

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

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

supply of deliverable (with planning permission) and developable sites (over 1500 homes) identified within the NDP to meet the need up to 2030, and fully supports the LPA's 5-year land supply – indeed we have over 10 years deliverable supply. In addition, policies allow for the release of further land should there be evidence of a shortfall in delivery over time following the trajectory set out in Cornwall's Housing Implementation Strategy. Although this plan covers the period to 2030 running in parallel with the Cornwall Local Plan, there will be opportunities over this period to review, consider and plan for future growth beyond 2030.

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

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

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

- Measure to remove repetitions of NPPF and Cornwall Local Plan policies, whilst allowing people in the local community to understand the planning context in which individual policies sit, and provide a stand-alone document that clearly explains the holistic plan for the town to 2030, as well as being a working document for planners.
- Retention of policies on cross-subsidy of employment land release from housing developments, and the prioritizing of brown-field sites for further development, despite both being questioned, as they are seen as fundamental to what came out of public consultation and engagement and seek to support national and CLP objectives.
- Clarification of boundaries; enlargement of some maps;
- Enhancing employment policies to be clearer and precise; update in light of recent agreement with Menheniot Parish Council;
- Clarifying the position of urban capacity sites policy to comply with Historic England suggestions to support;
- In the Town Centre removing Postal sorting office from TC1, and making the cattle market policy more precise
- Enhancing the information on heritage landscapes, habitats and biodiversity, to support green corridors, and area of local landscape value, responding to suggestions for running track and outdoor gym facilities and updating figures on open space from CC's very recent document.

**Note: Responses are coded as follows:**

**A – Statutory Organisations**

**B – Local & Regional Organisations**

**C – Community**

**D – Developers**

**E – Cornwall Council Officers**

**TABLE 1 GENERAL COMMENTS MADE ON THE LISKEARD NEIGHBOURHOOD DEVELOPMENT PLAN**

TABLE 1: GENERAL COMMENTS MADE ON THE LISKEARD NEIGHBOURHOOD DEVELOPMENT PLAN			
RESPONSE REFERENCE	SUMMARY OF ISSUES RAISED	STEERING GROUP RESPONSE	PROPOSED AMENDMENT TO NDP IF REQUIRED
A1[1]	<p>A1[1]: <u>Some</u> allocations fall outside the Plan Area. Only policies/proposals for land within the designated plan area should be included within the Plan.</p> <p>Any allocations on best and most versatile land must be justified in line with para 112 of the NPPF. <i>'NPPF 112. Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.'</i></p>	<p>Explanation on Page 24 makes it clear that in some adjoining areas development proposals may occur or be desirable that directly impacts on the social, environmental and economic interests of Liskeard. It is therefore considered appropriate that the Liskeard NDP should make recommendations to the adjoining parishes and the Local Planning authority as to how these important areas of land might be dealt with in planning terms. However, the use of the word 'Proposal' in this context may be misleading and cross-reference back to the explanation on p24 may help.</p> <p>Agricultural Land Classification was taken into account during the neighbourhood plan's assessment ranking in terms of sustainability and suitability. Also, sites with current planning permissions or active planning applications have already been / are being examined under NPPF terms in that process.</p>	<p>Replace the word 'Proposal' on Page 24 and elsewhere in this context with 'Suggestion'.</p>

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RESPONSE REFERENCE	SUMMARY OF ISSUES RAISED	STEERING GROUP RESPONSE	PROPOSED AMENDMENT TO NDP IF REQUIRED
A5	A5: Dobwalls and Trewidland Parish Council supports the Liskeard NDP..		
D2[1], D2[2]	D2[1]: Supports production of Liskeard NDP, but says that several changes are needed to ensure that the plan meets the Basic Conditions requirements D2[2]: Sets out a long exposition of the Basic Conditions requirements, the NPPF and the NPPG, and the Cornwall Local Plan.	D2[1], D2[2]: Noted	
A2[2]	A2[2]: Criterion Scoring methodology for assessment of the suitability of the proposed development sites does not meet requirements of NPPF to demonstrate an understanding of the significance of relevant heritage assets and that where harmful impact will occur that this is outweighed by public benefits which cannot be met in any other way. Therefore, cannot confirm that an SEA is not required, nor that the contents of the Plan are in conformity with the NPPF and Local Plan.	Following discussion HE accepted that no specific allocations were being made that did not have Heritage assessments and that the town centre sites were not allocations for which such assessments were required. It was agreed that the full housing capacity list should not be included in the draft plan to avoid the suggestion that they were approved allocations. It is anticipated that HE will amend their response to confirm that an SEA is not required and that the NDP is in conformity with the NPPF and CLP.	See consequential amendment to page 41
B1	B1: Supports the emerging NDP and willing to assist with the delivery of the proposals relating to the sympathetic regeneration through: <ul style="list-style-type: none"> <li>£3,000 Regeneration Fund to support community groups on projects contained in the NDP.</li> <li>Assessing planning applications that may impact on the towns regeneration using the NDP as a marker</li> </ul>	Noted and welcomed	Include reference to Town Forum role and fund in Delivery Plan section.
C2	C2: I agree with the main themes, employment to bring money into the town.		

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C29	C29: A lot of work has gone into this. Lets hope Cornwall Council takes notice		
C31	C31: Really great that someone is taking an interest in Liskeard and the whole area		
C41	C41: You have worked hard to engage with us in Liskeard and produced a detailed and comprehensive plan which is both positive but also shows we're a valued community deserving of care and consideration - not just to be walked over by inappropriate development, with decisions taken elsewhere. Thank you.		
C84	C84: A succinct summary of Policies needed to engage public. Otherwise the document is a challenge for consultees to digest and comment on.	C84: The NDP has to be of use for a variety of audiences and some compromise in the language is inevitable. For this reason we created a plain English leaflet explaining the draft NDP.	
E2	<u>E2: Repetition of strategic policy.</u> Many policies of the NDP repeat the policies of the Cornwall Local Plan. This makes the Liskeard NDP a long document and may make it harder for developers and decision makers to identify the parts of policy which do add key criteria to strategic policy. We would advise you to avoid repetition of national or local strategic policy and focus on the elements of policy which identify local requirements. This is indicated in the individual policy section below.	E2: In most cases the intention is to add local requirements, and no CLP or NPPF wording has purposefully been used. However there are elements which may be perceived to repeat the intentions of strategic policy which have been included deliberately to help provide context and make sense of the local elements within policies so that it can be read as a stand-alone document for the community. These instances have been reviewed and where appropriate without loss of clarity have been adjusted in the light of the comment made.	See individual policy sections.

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

**TABLE 2: COMMENTS MADE ON SPECIFIC THEMES, POLICIES AND TEXT OF THE LISKEARD NEIGHBOURHOOD DEVELOPMENT PLAN**

PLAN SECTION	RESPONSE REFERENCE	SUMMARY OF ISSUES RAISED	STEERING GROUP RESPONSE	PROPOSED AMENDMENT TO NDP IF REQUIRED
<b>Introduction Pages 1 – 10</b>	No comments received			Title page: change date to 'April 2017' Page bottom: 'submission draft plan' Page 2: replace para 1 with: 'This is the submission draft of the Liskeard Neighbourhood Development Plan. Following Regulation 14 consultation, comments have been responded to, with appropriate amendments made. These have been agreed by the NDP Steering Group and Liskeard Town Council, with approval for this draft to be submitted to Cornwall Council for Regulation 16 consultation.



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				<p>Delete para 2 &amp; 3.</p> <p>Para 4: Delete: 'Further consultations will be held, and if Cornwall Council assess'; replace with: 'Cornwall Council will assess....- then continue with rest of para 4, and para 5.</p> <p>Delete para 6 and replace with: Data used in this draft are based on figures given in the adopted Cornwall Local Plan, November 2016</p>
<b>Plan Preparation Process Pages 11 – 12</b>	No comments received			Page 11: Acknowledge O.S. + copyright licence number below map
<b>Planning Framework Pages 13 - 16</b>	E1[1] C90[2], C90[3]	E1[1], C90[2]: The Cornwall Local Plan: Strategic Policies is now adopted and so reference to the former Caradon Local Plan should be updated. C90[3]: Some useful policies 'saved' from Caradon plan are no longer, so need reinforcing through NP.	E1[1], C90[2]: Accepted C90[3]: Many of these policies are effectively absorbed in the Cornwall Local Plan policies, or have been 'retained' in the CLP, or captured in this NDP.	<p>P16 delete paragraph referring to Caradon Local Plan: replace with: 'Caradon Local Plan</p> <p>The Caradon Local Plan is no longer the main source of local planning policy, as it has now been superseded by the Cornwall Local Plan, although some policies within it have been carried forward (see CLP appendix 3). The Caradon Plan was reviewed during the preparation of the NDP, and useful policies that have not been saved by the CLP, are reflected in Liskeard's NDP policies. '</p>
<b>Setting the Scene Pages 16 – 21</b>	No comments received			
<b>Overview of Community Engagement Page 22</b>	No comments			

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	received			
<b>Plan Vision, Aims. Page 23 – 24</b>	A2[1], C7[1], B5[1], B9[1], C6[1], C11[1], C12, C15, C18[1], C34, C44, C48, C53, C54, C56, C65[1], C81, C89, C91, C101, C108	A2[1], et al: Plan is impressive, sophisticated and comprehensive document in its coverage of relevant issues. It is well written, easy to read, and provides a well-structure holistic outline for the future, that seems fair, proactive and reflects the views of the people of Liskeard	Noted and support welcomed.	Page 24: change heading to: POLICIES, SUGGESTIONS AND PROJECTS Then change 'proposals' to 'suggestions' in para 1, line 3; para 3 lines 1, 9 & 13; para 4 line 5.
<b>Development Boundary. Page 25 POLICY NP1</b>	E4, B5[2], C3[3], C85[1], D1, D2[3], D3[1]	E4: <b>NDP Area:</b> 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. B5[2]. Plan should show awareness of the proximity of the northern boundary to the built area of St Cleer Parish and an aspiration to prevent the coalescence of the settlements. C3[3]: Please ensure we keep to the development boundary at least to	E4: Accepted. As an alternative, amendment proposed to show the Tencreek Planning Permission (which is clearly a matter of fact, and not a policy of this NDP, and the 'suggestion' of a new employment area made in Proposal EM3. B5[2], Concern is noted but coalescence is not considered to be a significant issue at this time as more suitable land for development is available elsewhere within the Plan period. C3[3]: The development boundary may need to be breached under the terms of Policy H5 if the trajectory of housing completions declines. C85[1]: Not	Delete final paragraph of 'Comment' and replace with;  <i>'The built-up area of Liskeard now extends beyond the town's administrative boundary, which is also the Designated Area for this NDP. Therefore, the proposed development boundary ceases at the extent of the Designated Area. Menheniot Parish Council, which is preparing its own NDP, has been asked to similarly indicate the town development boundary, wrapped around the site of the Tencreek mixed-use development site (with planning permission), and the suggested</i>

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		<p>2030</p> <p>C85[1] should say 'parish boundary' rather than 'parishes' plus should continue across Island Shop Jn</p> <p>D1: Suggests development boundary should wrap around additional land at Addington (see also comments on Policy H4)</p> <p>D2[3]: The settlement boundary is drawn too tightly and provides no flexibility for additional sites to come forward. CLP Paragraph 2.32, which identifies that Neighbourhood Plans can identify settlement boundaries, is intended to apply to rural settlements, rather than a key settlement under Policy 3 such as Liskeard.</p> <p>D3[1]: Development boundary should enclose land at Woodgate Road.</p>	<p>understood. D1: See response under H4. D2[3], D3[1] Not accepted, there is nothing in the CLP says that Development Boundaries can't be used, and in any event, we have a policy that allows flexibility in policy H5.</p> <p>General Note: Comments received at the drop-in events identified small deviations in the marked boundary including at Trevillis Park.</p>	<p><i>employment site at Bolitho Farm</i>.</p> <p>[Map: Amend development boundary to exclude the land outside the designated area and land mistakenly included at Trevillis Park. Amend key from 'parishes' to say 'parish boundaries']</p>
<b>A Place to Work and Learn Pages 26 - 35</b>	B5{3}, C7[1], C16, C52, C65[3], E9	<p>B5{3}; C7[1], C16, C52, C65[3]: Support. Good quality employment is essential to the economic future of both Liskeard and its hinterland and is vital to support the development of housing. Safeguarding land for employment use is an important aspect of this. Mixed use sites should preserve the quality of life for residents in proximity to industrial uses. However, there should be more emphasis on encouraging self-employment opportunities and</p>	<p>B5{3}; C7[1], C16, C52, C65[3]: Noted. The NDP seeks to release a range additional employment land through the identification of sites and release of funding to enable their development.</p> <p>E9 – Note and comment. Sites have been selected to maximise access, alongside roads with bus services, pedestrian and cycle routes and local facilities, around neighbourhood nodes.</p>	

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		manufacturing jobs. E9: Where appropriate new employment development should look to facilitate safe and sustainable access to encourage employees to walk, cycle and use public transport to work. This should range ensuring links with current infrastructure are incorporated into new employment development, facilities such as cycle parking and showers are provided for employees and travel plans are in place where appropriate		
<b>Policy EM1 - Employment and Housing Balance.</b>	C18[2], C79, E10, D2[4], D3[2]	C18[2], Jobs before housing, C79 Need more visitor accommodation. E10: developers cannot be required to provide up-front employment land or cross subsidy contributions. What would the contributions be used for? What is the evidence that land or contributions are required? There are employment sites that have been allocated and have not come forward, so provision of land does not seem to be the issue. D2[4]: not clear how proposed contributions would comply with the tests set out in the CIL Regulations (122) and paragraph 204 of the NPPF. It is not reasonable to expect other developments to fund the resolution of a ransom strip issue to release the	C18[2], C79: Noted. E10, D2[4], D3[2]: Very little employment land has come forward in recent times because of a lack of choice and the reduction in public sector intervention funding. The policies of the NDP seek to redress this by identifying a variety of sites, encouraging mixed-use developments, and using planning mechanisms to release contributions for implementation. The implementation stages are: <ul style="list-style-type: none"> <li>• “assembling” land by purchasing from the various landowners;</li> <li>• “servicing” the land by the provision of roads and services;</li> <li>• “decision making and disposal process” of fully serviced employment plots to local and</li> </ul>	Page 28 policy EM1: line 2 – after ‘housing provision,’ replace text with ‘... all new larger housing schemes (30 or more dwellings) must contribute towards the need (as defined in the Cornwall Local Plan) for employment land, or servicing and development of such sites to facilitate the delivery of viable workplaces, through a process of cross-subsidy’. Then continue with existing text until next to last line – replace: ‘the release of employment land...” with “...the release / development of employment land....”  [Also put the above into Policy H3]  Page 31 insert <b>‘Comment</b> Very little employment land has come forward in

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		<p>employment land at Charter Way (EM2B)</p> <p>D3[2]: Provision of employment land and residential housing on the same site is bad planning and will lead to an excess of B1 sites. To add industrial contributions of an unspecified amount without any set out mechanism to determine how those would be arrived at will inevitably impact detrimentally on site availability into the future.</p>	<p>inward businesses.</p> <p>To simply identify employment land and then not to undertake the other steps necessary to make the serviced employment plots really “available” adds a further 3 – 5 years to the development process. Furthermore, the clear majority of prospective private sector purchasers are not established to undertake the role. They are manufacturing or service specialists that require the timely construction of a new factory or office.</p> <p>There will be no take up of employment land even though it might be critically important if the other steps are not taken. This was recognised in the ‘Cornwall Employment Sites Study Liskeard July 2012’ which recommended local action using Community Infrastructure Levy to enable development.</p> <p>Mixed use is usual in modern times and cannot be considered as ‘bad planning’. Furthermore, mechanisms to fund on and off-site development of affordable and other housing are well developed and provide useful</p>	<p>recent times because of a lack of choice and the reduction in public sector intervention funding. The policies of the NDP seek to redress this by identifying a variety of sites, encouraging mixed-use developments, and using planning mechanisms to release contributions for implementation. This involves assembly and purchase of land parcels, provision of roads and services, and marketing to prospective users. Cross-subsidy would facilitate timely completion of these processes, as was recognised in the ‘Cornwall Employment Sites Study Liskeard July 2012’ which recommended local action using Community Infrastructure Levy to enable development. As a probable zero-rated area for CIL, alternative developer contribution mechanisms are appropriate.’ Then continue with ‘Examples of...’ as before.</p>



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			models to follow.	
Policy EM2 – Employment Land Allocation	A1[2], C13, C32, D2[23]	A1[2]: Policy should refer to a named plan showing the allocated sites and that each site is named on the plan. C13, C32: employment should in a sensible place near the main A 38 for lorries and deliveries C20 Liskeard needs an agricultural focus as it's in a rich farming area, especially if the cattle market closes. D2[23] Suggest additional allocation at Coldstyle Road (see comments on Policy H4 below)	A1[2]: Accepted. C13, C32: All the main sites are located near to the A38 or are easily accessible from that road. C20: EM3 specifically refers to its suitability for a grouping of businesses related to agricultural technology and processing. D2[23] Not accepted. See comments on H4.	[Revise Proposals Maps and publish at an appropriate scale that allows for accurate interpretation and indexing of sites affected by NDP policies and suggestions.]
Policy EM2A – North of Pengover Road	D2[5]	D2[5]: Support in principle, but allowance should be made within the policy for an element of A1 and A3 retail uses on the site. Also it is not necessary to access the site from Clemo Road	D2[5]: Accepted	Page 28 Amend policy EM2A as follows: The development of the land north of Pengover Road must: a) Be for use classes B1, B2, B8, A1 and A3 only; and b) Be commenced in advance of/ concurrently with any development of adjoining land for residential development; and c) Ensure that the main vehicular access to the site operates safely in conjunction with the Clemo Road Industrial Estate Rd.
Policy EM2B – East of Charter Way	E10[2], D2[6], D4	E10[2]: There are employment sites that have been allocated and have not	E10[2], D2[6]: It is recognised in the 'A Place to Live' report that the site has	Page 28 Policy EM2B, Amend last paragraph by deleting 'small' and

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		<p>come forward, so provision of land does not seem to be the issue.</p> <p>D2[6]: Concerns there is no reasonable prospect of the site coming forward during the plan period as there are significant and fundamental constraints. The inclusion of a 'small element of housing' as proposed by the policy will be insufficient to overcome the issues. Alternative allocations should be considered to deliver the necessary employment land.</p> <p>D4: We support the objective in the Liskeard Neighbourhood Plan to bring forward employment on the site described as East of Charter Way... As owners of a large part of this land, we would be happy to enter into talks with a view to develop this site as an extension of the Business Park already in place at the Northern edge of our land. As stated in policy EM 2b we understand that this might involve a degree of mixed use depending on viability.</p>	<p>not come forward due to various factors including the existence of a ransom strip across the only feasible access route and a lack of enabling funding'. The latter involved removal of specifically allocated funding by Cornwall Council in 2009. The NDP retains the site for employment development but also provides for cross-subsidy from housing, self-build residential development, live work units and recreational facilities, and potentially developments elsewhere. As a result, positive negotiations are now taking place and a scheme is expected to come forward in the future. Some clarification is necessary in a proposed amendment to avoid misinterpretation of the cross-subsidy from housing and provide further explanation. Regarding the need for additional land for employment, intention was to Learn from the previous situation and does not have just a single employment site whose development does not come forward but to look at several options as per the approach suggested in 2012 with the Cornwall Development Company study. The NDP policies EM1 and EM2 taken with existing permissions achieves this and exceeds the CLP</p>	<p>inserting '...an element...'</p> <p>Page 30 Justification for EM2, 2b, suggestion EM3 on Page 30, top of second column: after '...NPPF and' insert: be in compliance with the floorspace provision of the ...'</p> <p>Justification for EM2b on Page 30, after "was removed by Cornwall Council", insert '...and the CLP does not allocate specific economic regeneration funding to Liskeard, ....."</p> <p>Justification for EM2b column 2 on Page 30, at the end of the paragraph: insert '(and there is now positive stakeholder interest).'</p>

**TABLE 2: COMMENTS MADE ON SPECIFIC THEMES, POLICIES AND TEXT OF THE LISKEARD NEIGHBOURHOOD DEVELOPMENT PLAN**

PLAN SECTION	RESPONSE REFERENCE	SUMMARY OF ISSUES RAISED	STEERING GROUP RESPONSE	PROPOSED AMENDMENT TO NDP IF REQUIRED
			requirement and so further land is not necessary. D4: support welcomed.	
Proposal EM3 - Allocation of Employment Land Outside but Abutting the Liskeard Neighbourhood Plan Designated Area	A4, C85[2], E11, D2[7]	A4: Supportive of proposals agricultural technology and processing and other employment uses, and recognises the contribution it makes to a CNA wide requirement. C85[2]: Re 'proposal EM3' - should read 'policy...' E11: This cannot be a policy. Could be referred to in supporting text, but cannot have a policy which operates outside the NDP area. D2[7]: not clear from the evidence base as to whether there is agreement with Menheniot Parish Council over the prospective allocation of the site, and furthermore whether the site is being actively promoted / deliverable.	A4, Noted and welcomed. C85[2], E11, This is not put forward as a 'Policy' but as a 'Proposal' as explained on page 24, 2 <sup>nd</sup> column, 3 <sup>rd</sup> paragraph. D2[7]: See statement by Menheniot PC to the effect that it 'supports proposals in the plan (A Place to Work & Learn) for the use of land at Bolitho Farm for agricultural technology and processing. Additional land that lies adjacent to Bolitho Farm, and is easily accessed from the main road network, is recognised as having the potential for other employment uses. The parish council is supportive of these proposals, and recognises the contribution it makes to a CNA wide requirement'. Active positive negotiating in hand.	See comments on mapping at page XX Page 29. replace the word 'Proposal' with 'Suggestion' as elsewhere in this context.
POLICY EM4 -Safeguarding Existing Employment Land	C60, E12	C60: Moorswater: extend employment area into Dobwalls parish to include industry units (china clay sidings) E11: Part of Moorswater estate is also outside the NDP area	C60, E12: Noted. In accordance with advice received the safeguarded area cannot be extended beyond the Designated Area of the NDP. Dobwalls PC might consider including similar provision for that part of the estate in their NDP area.	Page 29 Policy EM4 point 7 add after '.... estate': 'within the NDP area'.
POLICY EM5 - Home Based	E13	E13: Planning permission is not	As explained on p 30, we know this.	Page 29 EM5 at the end add: 'Planning

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Enterprise		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.		permission will be required if there are alterations to buildings, or the scale of business materially changes the use of the premises'
POLICY EM6 -The Development of an Innovation / Business Support Hub Project 2	B7, E14	Should be considered for high priority to take advantage of CLLD funding, which is expected to be available from March 2017 E14: where policies refer to a site this should be shown on a clear map (eg Liskeard School)	B7, Accepted E14, Accepted, but it would be inappropriate and confusing to show the whole school site under this policy, therefore removal of specific reference to school is preferred.	Page 86 & 88 Amend Delivery Plan to show this Policy and Project as a high priority. page 32: Retain '...and' - Remove 'also on land ... Liskeard School' from Policy EM6
POLICY EM7 - Redevelopment and Enhancement of Existing Employment Sites	C60, E15	C60: Moorswater: extend employment area into Dobwalls parish to include industry units (china clay sidings) E15: think the intention of the policy is to retain employment use, but the policy could be interpreted as allowing redevelopment (ie for housing.) please clarify.	C60, see response on Policy EM4. E15, Accepted: revised wording proposed.	Page 33: Amend line 4 of EM7 to read '...upgraded <i>business and employment</i> premises....'
POLICY EM8 -Small Workshop Development in the Countryside	E16[1] E16[2]	E16[1]: the policy repeats some of the criteria of CLP Policy 5, but adds extra criteria (g) Do all the criteria (a-g) have to be met? It may be better to separate out the policy for new build and the policy for conversions –it appears that conversions are preferred and new build will only be	E16[1] Not accepted, Policy EM8 adds appropriate and precise local criteria to clause c) of CLP Policy 5* and does intend to prioritise conversions of existing buildings over new build as this more sustainable within the terms of NPPF 28. It is intended that all criteria a) to g) must apply, and h) to j)	After criteria f) insert 'and' – After i) insert 'and' + after j): delete listed building criteria and insert 'where development involves conversion or change of use of a listed building, CLP strategic policy 24 will apply'

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		allowed if an existing building cannot be converted. E16[2]: The additional criteria relating to the conversion of listed buildings are covered by strategic policy	where conversion or CoU requiring planning permission occurs. E16[2] Accepted. *'in the countryside and smaller rural settlements be of a scale appropriate to its location or demonstrate an overriding locational and business need to be in that location such as farm diversification;	
<b>A Place to Live 36 - 47</b>	C7[3], C93, E17	C7[3], C93 : Support E17: Supportive of improved access to the town centre and neighbourhood facilities by walking, cycling and public transport improvements as part of new development	C7[3], C93, E17: Support welcomed.	
Policy H1 -Meeting the Housing Requirements of the Cornwall Local Plan to 2030	C19, C12, C22, C23, C35, C105[1], E3, E18, D1[2], D2[8], D3[3]	C19, C12, C22, C23, C35, C105[1]: We've taken on board a lot of houses as stipulated by Cornwall Council but what happens when more developers want to build here when we've already got enough for years to come? Liskeard must not become a characterless dormitory town – it should grow steadily. More housing should be targeted on surrounding villages to make them more sustainable and reduce pressure on Liskeard. <u>E3[1]: Housing targets:</u> The NDP demonstrates general conformity with the housing targets in the Cornwall Local Plan; identifying a suitable	C19, C12, C22, C23, C35, C105[1], D2[8]: The housing 'apportionment' for Liskeard is set out in CLP Table 1 which is derived from the best available demographic growth projections and a sustainable spatial strategy (CLP Policy 2) on which is based the role and function of places set out in CLP Policy 3. Existing permissions, windfall and allocations in the NDP are sufficient to meet this 'apportionment' and include a small surplus and a careful mechanism to release land to meet any under delivery of the 'apportionment'. It is therefore expected that the Local Planning Authority will resist any	Page 38: 'POLICY H1' in capitals: After '...urban extensions...' delete '...will be supported' and replace with: '....as indicated on the proposals map and within the development boundary (Policy NP 1) will be supported.'



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		<p>amount of land, when taken together with the planning consent at Tencreek, in neighbouring Menheniot Parish, to meet the CLP target for Liskeard.</p> <p>E18: this is an objective, but not a policy – recommend removal</p> <p>C105[1] clarify wording to make clear where development can happen - at present could go anywhere</p> <p>D1[2]: see comments on H4. D2[8]: Support, but target should be expressed as a net figure and a minimum.</p> <p>D3[3]: support</p>	<p>proposals for <i>additional</i> housing on the basis that they cannot be sustainable development within the terms of CLP Policies.</p> <p>E3[1]: Noted and welcomed.</p> <p>E18: Not accepted. Policy H1 is an essential context setting statement by local people that expresses the clear intention to deliver sustainable development, not restrict it. It also expresses the intention to achieve this through a sensible sustainable development strategy.</p> <p>C105[1]: Accepted. Further clarification is proposed.</p> <p>D1[2] See response at H4.</p>	
Policy H2 - Brownfield Land First	<p>E3[2]</p> <p>CX6[2], C8[1], C21, C24, C28[1] C29, C40, C43, C45, C46, C55, C57</p> <p>D2[9]</p>	<p>E3[2] NDP is not able to insist on brownfield delivery first and Policy H2 should be removed.</p> <p>CX6[2], C8[1], C21, C24, C28[1] C29, C40, C43, C45, C46, C55, C57, Support. Good idea build on brown field and sites and empty buildings before greenfield sites, and gives the opportunity to enhance the present architecture and bring some vibrancy to our town centre.</p>	<p>E3[2]: Not accepted for the reasons set out in the reasoned justification to the policy. This is now strengthened by the Govt's intentions to amend the NPPF as described in Paras 1.24 and 1.25 of 'Fixing Our Broken Housing Market':</p> <p><b><i>Bringing brownfield land back into use</i></b></p> <p><i>1.24 We must make as much use as possible of previously-developed</i></p>	<p>P 39 Amend H2 as follows: At line 5, following '.... identified.' delete all and insert 'in Table 1, and smaller unidentified and windfall sites within the urban area (using the base date for measurement of 1<sup>st</sup> April 2016), and the conditions in policy H5 apply.'</p> <p>Reasoned Justification: 1<sup>st</sup> Column, Para 1, after NPPF quote</p>

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		<p>But <b>what</b> will Cornwall Council Planners <b>do</b> to support this? Note that Developers / builders need to have real incentives to use run-down brownfield sites</p> <p>C57 There is no recognition of the ecological supremacy of natural vegetative conditions un-altered by man.... Modern building techniques make it impossible for nature to redeem the land at any time in the future....Greenfield development should only be permitted where buildings are constructed from materials found on site....possibly with the addition of brought-in timber for the structural framework of the buildings...(precis of longer comment)</p> <p>D2[9]: Policy H2 is inconsistent with the NPPF, which seeks to 'encourage' rather than 'prioritise' the development of previously developed land as demonstrated in Para 14 of SoS decision at Burgess Farm, Salford (quoted). Also inconsistent with need to maintain 5 year housing land supply. Not clear if realistic assessment of the deliverability of the sites</p>	<p><i>('brownfield') land for homes – so that this resource is put to productive use, to support the regeneration of our cities, towns and villages, to support economic growth and to limit the pressure on the countryside. The Government is already pursuing a number of reforms to make this happen, as set out in the annex.</i></p> <p><i>1.25 Going further, the presumption should be that brownfield land is suitable for housing unless there are clear and specific reasons to the contrary (such as high flood risk). To make this clear, we will <b>amend the National Planning Policy Framework to indicate that great weight should be attached to the value of using suitable brownfield land within settlements for homes</b>, following the broad support for this proposal in our consultation in December 2015.</i></p> <p>It is also noted that the current NPPF, in relation to conserving the natural environment, says that Plans 'should allocate land with the least environmental or amenity value (Para 110)....Planning policies and decisions should encourage the effective use of land by re-using land that has been</p>	<p>ending '...environmental value' add rest of sentence: 'and LPA's should identify and bring back into residential use empty housing and buildings.'.... In Paras 110 and 111 the NPPF says that Plans should allocate land with the least environmental or amenity value and that planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value, and that local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land'.</p> <p>1<sup>st</sup> Column, after Para 1 , add new paragraph 2 as follows: ' The Government's February 2017 Housing White Paper "Fixing Our Broken Housing Market" refers on page P25 to bringing brownfield land back into use, to support economic growth and to limit the pressure on the countryside, and states in paragraph 1.25 'Going further, the presumption should be that brownfield land is suitable for housing unless there are clear and specific reasons to the contrary (such as flood risk). To make this clear we will <b>amend</b></p>

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			<p>previously developed (brownfield land), provided that it is not of high environmental value. Local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land (Para 111)</p> <p>Community engagement at the start of the plan process indicated a strong desire to prioritise the use of urban brownfield sites, before greenfield sites were released. This support has continued through the R14 pre-submission consultation. Given the Govt's intentions It would be a betrayal of community faith in the Liskeard NDP if the policy were now to be deleted.</p> <p>D2[9]: Clearly the national policy position on brownfield land is changing in favour of the NDP policy position. Furthermore, the quoted appeal case text appears to be at variance with the original text of Para 14. As the 5 year supply issue is measured at a Cornwall wide level the application of the argument at neighbourhood plan level is irrelevant.</p>	<p><b>the National Planning Policy Framework to indicate that great weight should be attached to the value of using suitable brownfield land within settlements for homes'.</b></p> <p>Add new Para 3: 'Community engagement at the start of the plan process indicated a strong desire to prioritise the use of urban brownfield sites, before greenfield sites were released. This support has continued through the R14 pre-submission consultation.' Then continue with text starting: 'The introduction to Policy 21....'</p> <p>Page 39 delete very last paragraph</p> <p>Page 40 Delete last sentence and insert: '(see p 44 for figures updated since April 2016)'</p> <p>Page 41, Delete Table 1 and insert: 'During initial scoping of urban capacity, it was estimated that there was the potential for up to 130 new dwellings within the urban envelope, in addition to the allowance made for windfall under the Cornwall Local Plan criteria. This figure is discounted by 30% to allow for non-delivery, giving a total urban potential of 90, plus remaining windfall. As can be seen from the table below, approaching half of this number is</p>

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PLAN SECTION	RESPONSE REFERENCE	SUMMARY OF ISSUES RAISED	STEERING GROUP RESPONSE	PROPOSED AMENDMENT TO NDP IF REQUIRED																		
				<p>already deliverable, with planning permission.</p> <p><b>Table 1 Deliverable urban capacity sites (with planning permission)</b></p> <table><tr><th>Site Ref</th><th>Address</th></tr><tr><td>HC15</td><td>Old Station Road, Moorswater</td></tr><tr><td>HC16</td><td>Old Station Road, Moorswater</td></tr><tr><td>HC17</td><td>Old Stag Inn, Station Road, Liskeard</td></tr><tr><td>HC22</td><td>Timberlee</td></tr><tr><td>HC23</td><td>Tenerife</td></tr><tr><td>HC26</td><td>Butchers Shop, Higher Lux Street</td></tr><tr><td>HC31</td><td>Rencliffe Cottage, Limes Lane</td></tr><tr><td>HC32</td><td>&amp; Greenbank Lane</td></tr></table> <p>Table 1 above shows permissions granted on urban capacity sites (brownfield and infill), totalling 40 dwellings. Note: the windfall allowance forecast used in the Cornwall Local Plan calculations is based on historic production, rather than site assessments. Scoping, based on local knowledge and site assessments confirms the validity of that forecast. Further information on the estimate of</p>	Site Ref	Address	HC15	Old Station Road, Moorswater	HC16	Old Station Road, Moorswater	HC17	Old Stag Inn, Station Road, Liskeard	HC22	Timberlee	HC23	Tenerife	HC26	Butchers Shop, Higher Lux Street	HC31	Rencliffe Cottage, Limes Lane	HC32	& Greenbank Lane
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				urban capacity can be found in the ' <a href="#">A Place to Live Working Group Report</a> '
Policy H3 - Employment and Housing Balance	B5[4], E19, D2[10]	B5[4]: Supports need for housing and employment balance. E19: as with policy EM1, this cross subsidy is not reasonably related to housing development. Recommend removal. D2[10] Repeats objection to policy EM1	B5[4], Support is welcomed. E19, D2[10] see comments on EM1.	Page 42 policy H3 Amend as per EM1: '.... all new larger housing schemes (30 or more dwellings) must contribute towards the need (as defined in the Cornwall Local Plan) for employment land, or servicing and development of such sites to facilitate the delivery of viable workplaces. ...' At the bottom of H3 – remove 'the release of employment land' replace with 'the release/development of ...'
Policy H4 - Allocation to Meet Current Target	A1[2], C49, C77, E20, D2[11]	A1[2]: Policy should refer to a named plan showing the allocated sites and that each site is named on the plan. C49 C77: New houses should be located near the station All the trains stop here and its good for travel to work C86[2] If housing development at Addington extends up to new park it could that provide better access to the site for walking and cycling as well as vehicles? E20: this site has planning approval - not an allocation. Delete. D1[1 to 4 and 7]: Suggests that development Boundary should be extended to include land north of Persimmon site at Addington to	A1[2]: Accepted. Unfortunately, the scale at which the maps were printed caused site details to be suppressed by the software. C49, C77, C86[2]: Not accepted, sites were prioritised using 12 sustainability factors and on balance the allocated site scored better. Future releases will be subject to H5. E20: Not accepted, the site is subject to a planning application but this has not yet been approved. D1[1 to 4 and 7], D2[21]: Not accepted, sufficient flexibility linked to the housing trajectory methodology used by CC is already built in to the NDP. Note that site at Addington has never benefitted from outline	[Revise Proposals Maps and publish at an appropriate scale that allows for accurate interpretation and indexing of sites affected by NDP policies and suggestions.]



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		<p>encompass a site that previously had outline planning permission, as it 'would be prudent to allow flexibility in the Neighbourhood Plan for reserve sites to be brought forward when allocated sites are not delivering or have stalled and housing shortfalls are identified'. The current surplus of 9% is insufficient, and the allocation of the Addington as a 'reserve' would be more effective. The site is a logical extension and provides opportunity for links to the Roundberry Park and improved infrastructure contributions. It would meet the requirements of policy H5 (other than H5f).</p> <p>D2[11]: Supports allocation. D2[21] Proposes 17.6 ha allocation west of Codlstyle Road for mixed use development of 150 dwellings and 5ha of employment land, as a means of providing flexibility in meeting the housing requirement, which is a minimum figure, and to deliver employment land. Current surplus of 8% is too low and 20% should be allowed so that a 5-year housing land supply could still be maintained should sites not deliver at the rates anticipated. As such, the land at Coldstyle Road could be allocated, or in the alternative identified as a</p>	<p>permission.</p> <p>D2[11]: Support noted.</p>	

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		reserve site, to provide the plan with the necessary flexibility to respond to rapid change.		
POLICY H5 - Ensuring Housing Delivery to Meet the Target Up To 2030	E1[2], E21, D1[5], D2[12], D3[4]	<p>E1[1]: On page 43 the NDP refers to the Cornwall Structure Plan, in error.</p> <p>E21: The target of 1400 is not a maximum. This policy could be useful for controlling the quality of any further development, but specify whether all the criteria apply? D1(5) Policy H5 (f) on self-build. It is not workable or practicable to deliver the 5% serviced site provision during the operational phase of development. This requirement is likely to be realised in the final phase of construction, if feasible, and should be considered concurrently with the provision of affordable housing and policy H5 (g) on Community Land Trusts. These seek to deliver an alternative means of affordable housing (which can include self build) and as such should be considered as part of an affordable housing scheme or contribution concurrent with Policy H5(f).</p> <p>D2[12]: Support the intention, but the policy is faulty and confused, and an inappropriate tool. Correct approach is to apply presumption in favour of sustainable development as per NPPF.</p>	<p>E1[1]: Accepted, amend accordingly</p> <p>E21: Accepted, but note (1) that whilst the CLP Inspector required in his Report (Para 139) that the Cornwall target should be regarded as a minimum, he also stated that it was 'not necessary to similarly indicate that all the apportionments for each town and CNA residuals should be minimum figures'. This is the approach being taken by CC in the DPD.</p> <p>(2) CLP Para 1.74 to the effect that 'Where a five year supply can be demonstrated, the adequacy of supply in meeting the needs of a particular CNA or town over the whole Plan period will be a material consideration when making planning decisions. Any deficiency in supply should be accommodated within the CNA with a shortfall and not be compensated for by increasing supply in other CNA's where existing supply is sufficient to meet its Local Plan target.</p> <p>(3) According to the Cambridge Dictionary a target is 'a level or</p>	<p>Page 43: Amend title to: 'Ensuring Housing Apportionment Target up to 2030'</p> <p>Policy H5, line 3 delete 'set' then line 5, after '...housing..' delete '..'would be allocated in accordance with...' and insert 'will be allowed in accordance with Policy H2 and..'.</p> <p>H5 b) Insert at beginning: 'If appropriate'</p> <p>Page 43, following Policy H5 box, delete 'Cornwall structure Plan', and insert 'Cornwall Local Plan (Adopted November 2016)'</p> <p>Page 44, para 3: Delete last sentence – replace with: 'To date nearly half of these sites have already come forward.'</p> <p>Page 44: at bottom of housing figures table : insert: 'In addition to the figures above, the development with planning permission at Tencreek, has additional provision for approximately 60 later living/extra care units.'</p>

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

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			<p>All the criteria apply.</p> <p>D2[12]: We are happy with our policy which is positively supports development in a controlled and non-arbitrary way</p> <p>D3[4]: Noted. It is expected that detailed examination at application stage will examine viability and determine the nature of the mix and the form of involvement of a CLT.</p>	
Housing Objective 6	E22	E22: "...in the likely possible absence of CIL...". While Cornwall Council could decide not to adopt a CIL, at this stage, this is not considered likely. The current timetable is for adoption is Autumn/winter 2017.	Accepted.	Page 45 Objective 6. Para b), delete 'In the likely possible absence of Community Infrastructure Levy by'
POLICY H6 Agricultural Dwellings and Specialist Need Dwellings	B9[3]	if this was in the Lodge Hill area, there needs to be a clear and safe access to the town centre on foot	Noted	
POLICY H7 Infrastructure	B9[2], C64, C67, C68, E23, D2[13], D3[5]	<p>B9[2], C64, C67, C68: Continued residential development in the area should be balanced with the current and future development of facilities such as doctors, dentists, school sizes, poo bins, Church buildings, entertainment facilities etc.</p> <p>E23: this is covered by strategic policy, CLP Policy 28: Infrastructure (see general comments on developer contributions). D2[13]: Further</p>	<p>B9[2], C64, C67, C68: CLP Policy 28 and Liskeard NDP Policy H7 are intended to ensure that such provision is made. See also the Liskeard NDP Infrastructure Report.</p> <p>E23, D2[13]: Accepted. The policy intention is to ensure that as well as the standard items covered by S106 and CIL Regulation 123 'Strategic' level listing, the 'Neighbourhood' level items are also captured, and linked to</p>	<p>Convert Policy H7 and associated text into explanative commentary following Objective 6, including specific reference to the relationship between Section 106 and the proposed CIL Regulation local preference List. Consequential amendments to Delivery Plan listing.</p> <p>NB re-number the rest of the following housing policies</p>

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		clarification of how the policy links with the delivery plan is needed. D3[5]: Policy H7, Policy OSL5, Policy OSL6 & Policy OSL11A refer to contributions which should fall within the CIL Regulations and should be formatted in the plan rather than seeking 106 contributions from individual developments.	the Delivery Plan Table 2 set out at Page 88. The policy also served to provide essential contextual material reassuring the community that any infrastructure impacts of development would be addressed. Amendment proposed.	
POLICY H8 Redressing the Imbalance in Housing Tenure, Size and Mix	B5[5], B8[3], C18[3], C58, C61, C105[2], C28[2], C82, E24[1], E24[2], D2[14]	<p>B5[5]: Support – May redress impact of recent new build which has been mostly high density and very urban in feel rather than that of a rural market town.</p> <p>C18[3], C58, B8[3] Quality housing for all - the young, the infirm, the vulnerable and the elderly. C61 More affordable housing, C82 Sheltered housing needed. C105[2], C28[2]: Promote housing for the elderly</p> <p>E24[1] this is covered by strategic policy (CLP Policy 6: Housing Mix) If you have evidence of specific local needs then it would be useful to add this – if not, delete to avoid repetition.</p> <p>E24[2]: 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</p>	<p>B5[5], B8[3], C18[3], C58, C61, C105[2], C28[2], C82: Whilst continuing provision of smaller and specialist dwellings is essential, the need is also to balance the mix of dwelling types and tenures to ensure that a well-balanced and prosperous community is supported.</p> <p>E24[1]: Not accepted, the Policy supplements CLP Policy by indicating more specifically the mix of homes that are required, based on evidence in the 'A Place to Live' Report, summarised in the text following the policy. It also applies to developments below the threshold of 10 units set in CLP Policy 6. See also CLP section of Liskeard-Looe CNA for additional support. (PP15)</p> <p>E24[2]: Not accepted, although a good idea, fire precautions are not a</p>	<p>Page 45: Renumber policy H8 to: Policy H7</p> <p>Amend policy to refer to market demand as a factor by adding at end of Policy after d): 'Proposals must show how they assist in rebalancing the housing stock and meet market demands.'</p>



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		and d as these house the most vulnerable members of society. D2[14]: Supports concept of providing for a mix of dwellings, but contends that there is reference within the policy to meeting market demand, as this is just as important as reverting any perceived imbalance back towards Cornwall or national averages.	planning matter that can be dealt with in a Neighbourhood Plan.  D2[14]: Accepted.	
POLICY H9 Supporting the Town Centre	C4[2]	B5[6]: Units suitable for small households need to have enough living space within them to enhance the lives of their occupants. C4[2]: Mixed use developments near to town centre should be encouraged to attract knowledge based businesses that would bring better wages and skills to the area, and add vibrancy.	B5[6]. Noted. CLP Policy 13 applies the national space standard guidance contained in the 'Technical housing standards – nationally described space standard' (March 2015) so the issue does not need to be covered in the Liskeard NDP. C4[2]. The policy as written is sufficient, however the Comment could usefully be added to about knowledge based industries.	Page 46: Renumber policy H9 to Policy H8 Page 47: Amend 2 <sup>nd</sup> Paragraph of comment by inserting: 'In mixed use developments, where knowledge-based and professional home enterprise businesses may cluster....'
OBJECTIVE 9, POLICY H10 - General Design Principles	A3, C69, C74 C105[3], E25, D2[15]	A3 Support the references to Designing out Crime, and proposes wording to include anti-social behaviour. C69, C74 Parking charges too high and many workers park in housing areas - should be directed to suitable car parks so home-owners can park C105[3] H10 (a) should not base design standards on what is there already, but should make sure bad design is not perpetuated by copying	A3: Accepted C69, C74: Not accepted, Parking charges and controls are not a planning matter and cannot be controlled through a Neighbourhood Plan. C105[3]: Accepted, H10a is insufficiently clear that it is not intended to encourage detailed copying. E25: Accepted in principle, but it is considered that CLP Policy 12 does not cover all the local issues identified in the Liskeard NDP. Amendment proposed.	Page 47: Objective 9, add at end: ', disorder and anti-social behaviour'.  Page 47: Renumber policy H10 to Policy H9, and revise by deleting all text and replace with:  POLICY H9 General Design Principles 'New residential development must comply with Cornwall Local Plan Policy 12 and:

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		it. E25: repeats strategic policy (CLP Policy 12: Design) and does not add any local detail; delete to avoid repetition. D2[15]: Support		<ul style="list-style-type: none"> <li>a. Respond to and where possible provide remediation of existing environmental or design issues that are detrimental</li> <li>b. incorporate design features that enhance prevention of crime, anti-social behaviour and disorder and provide a secure environment by application of 'Secure by Design' standards</li> <li>c. Demonstrate high standards of sustainable design as set out in Policy SUS1</li> </ul> <p>Page 47: reasoned justification: delete all and replace with: <i>Every new development, of whatever scale, has a potentially significant effect on the appearance and character of an area, and impacts on local functionality, quality and sustainability. Cornwall Local Plan Policy 12 provides guidance on design expectations generally across Cornwall. In Liskeard, there are issues with areas of poor design or sensitivity, and perceived crime and disorder problems. It is also important to link design to sustainability issues.</i></p>
<b>A Place to Meet and Shop and Do Business 48 – 61</b>	A2[1], B5[7], C7[3], C51, C65[2], C80, C88,	A2[1]: An understanding of local heritage values and issues has informed the extensive range of locally specific policies and projects for the preservation and enhancement of	A2[1] Noted. B5[7], C7[3], C51, C65[2], C80, C88, C97[2], C97[3]: The NDP recognises that the town centre 'offer' and mix needs to be improved, and these are key intentions within the	Page 59 Objective 4: add additional point and renumber: 'Improve connections to the town centre for pedestrians and cyclists' Consequential amendments to OSL 4 and OSL11A

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	C97[2], C97[3], E26	the heritage of the area (Objective 3, p56 - 62). B5[7], C7[3], C51, C65[2], C80, C88, C97[2], C97[3]: Mix of shops is unbalanced, and currently many empty premises Wider offer with more known brands, restaurants, deli's, cinema, evening activity, needed. Cultural and historic heritage of Liskeard should be used as branding. Shopping centre needs to be user friendly for those who need to access from Liskeard's hinterland. E26: What role can the railway station and play in supporting the town as a destination for visitors and shoppers. Is there any opportunity to improve connections to the town centre for pedestrians and cyclists?	aims and strategic approach adopted (see Page 49), and the policies that follow.  E26: This is recognised in Policy OSL4 and OSL 11A but could be more explicit. Amendments proposed.	
Policy TC1 - New Large Scale Retail Development	B0, C11[3], C71, E27[1], E27[2]	B0: There are no plans in RM strategy to relocate the Liskeard DO, unless an alternative suitable site could be found at no cost to the business. Reference to redevelopment on Royal Mails property should be removed from the Neighbourhood Plan. C11[3]: Family friendly pub needed in town centre. C71: Parking isn't expensive & there are plenty of legitimate spaces within easy walking distance. E27[1]: needs a detailed/ large scale map to identify sites. E27[2]: Repeats	B0 Noted. The retail development requirement referred to in Policy 4 and Table 2 of the Adopted Cornwall Local Plan 2016 can be met on other sites identified in the NDP (Sungirt and Cattle Market). Amendment proposed. C11[3]: Wetherspoons development should fulfil this need. E27[1]: Accepted. E27[2]: Accepted but prefer to retain policy as it stands for completeness.	Page 50: Delete reference to RM Sorting Office in TC1 and make consequential adjustments to Proposals Map and town centre inset, to be produced at more legible scale. Page 51: top of para 2 renumber Policy TC1 to Policy TC2

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		some elements of strategic Policy. Clearer to delete these elements, and give emphasis to specific local requirements		
POLICY TC2 - Impact Assessment of Retail Developments	E28, D2[16]	E28: The NDP says the default threshold for retail impact assessments is 2,500sqm. What is the evidence and justification for setting such a low threshold? D2[16]: Agree that in Liskeard a lower threshold could be justified, but it is not clear how such a significantly lower requirement complies with paragraph 2b-016 of the PPG, which sets out the considerations for establishing a local threshold. proposed threshold for impact assessments of 200m2 is too low. T	<p>E28, D2[16]:NPPF 26 says that ‘...planning authorities should require an impact assessment if the development is over a proportionate, locally set threshold..’ NPPG 2b-016 describes the criteria to be used in setting a lower threshold. These are:</p> <ul style="list-style-type: none"> <li>• scale of proposals relative to town centres</li> <li>• the existing viability and vitality of town centres</li> <li>• cumulative effects of recent developments</li> <li>• whether local town centres are vulnerable</li> <li>• likely effects of development on any town centre strategy</li> <li>• impact on any other planned investment</li> </ul> <p>In effect the ‘A Place to Meet Shop and do Business’ report assesses these factors and justifies the lower figure, as is summarised in the reasoned justification. A threshold of 200sqM was set in the Caradon Local Plan in and has been effectively used consistently, including recent appeals.</p>	Page 51: Add at end of Comment: ‘It is anticipated that Cornwall Council will set a local threshold. Until Cornwall’s threshold for retail impact assessments is established, impact assessments will continue to be required under the terms of Policy TC2.

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

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POLICY TC4 Liskeard Cattle Market	C2, C6[3], C7[2], C7[4], C9, C11[2], C14, C17, C37, C62, C87, C92, E29	<p>C2, C6[3], C11[2], C14, C87, C9, C92: Plans look good, should include community uses, small supermarket to attract people into the town centre and later living apartments. C7[2]: A Cornwall College department would attract students spending and reduce travel. C7[4]: Would a further food store be viable? Better to encourage small specialist retailers. C9: Move the market to an edge of town site to save mixing animals with a modern town centre.</p> <p>C42, C62, C67: Object – Loss of cattle market will destroy role and character of Liskeard and impact on agricultural small holdings. Covered in market should be provided.</p> <p>E29: specify whether all the criteria must be met. Include a large-scale map of the site.</p>	<p>C2, C6[3], C11[2], C14, C87, C9, C92: Support noted and welcomed. C7[4]: Retail studies suggest that viability will not be a problem. Some small units could be included as well. C42, C62, C67: The NDP does not propose the closure of the Market. However, as noted in the comment on Page 54, it is though that the Market will close for economic and operational reasons in the lifetime of the NDP and so it is appropriate to plan for the beneficial reuse of the site.</p> <p>E29. Accepted. Preferred options are also emerging from the current studies. Amendment proposed to make it clear which criteria must be met and which are optional.</p>	<p>Page 53: Delete text of Policy TC4 Liskeard Cattle market, and replace with: Proposals for the regeneration of the cattle market must:</p> <ol style="list-style-type: none"> <li>1. Be of a scale and character appropriate to Liskeard and reflect the sense of place and the character associated with the site; and</li> <li>2. Maintain and improve the permeability of pedestrian routes through/across the site which: <ol style="list-style-type: none"> <li>a. Link to and from the main shopping area of the town</li> <li>b. Connect to Dean Street and Barras St/Windsor Place via Market Approach</li> <li>c. Retain connectivity to the existing Liskerrett Centre</li> <li>d. Provide a new pedestrian link to the rear of Rosedean House Surgery</li> <li>e. Improve access for vehicles and pedestrians along Fairpark Road,</li> <li>f. Maintain access to</li> </ol> </li> </ol>

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



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				<p>e) A mixed-use community centre including multi-functional hall for performance / exhibition / leisure and conference uses;</p> <p>f) Office space (Class A1 and B1).</p>
POLICY TC5 - Development in The Town Centre Primary Shopping Area and Upper Floors in Primary Retail Frontage	B9[5]	More should be done to encourage local traders to be a focal part of the town.	That is one of the purposes of the NDP	
POLICY TC6 - Development in the Primary Retail Frontages	E30	E30: this is more permissive than strategic policy CLP Policy4: shopping services and community facilities which requires the change of use from A1 to A2-5 also to demonstrate that the proposed use 'would not undermine the retail function of the town centre and maintain and enhance its vitality and viability.' Is it your intention to be more permissive in this way?	E30: Accepted, but it is the intention to be more relaxed, since CLP Policy 4 could restrict flexibility in the regeneration of the town centre.	
POLICY TC7 - Liskeard Town Centre Integrated Wi-Fi & Web Presence Strategy	C4[1], E31	<p>C4[1]: Support. Shops and services in town centre should have websites and club together to install a town wide WiFi. If necessary contributions could come from new developments through S106.</p> <p>E31: this could be a project or an objective, but is not reasonable as a policy – not clearly related to</p>	C4[1]: Support noted. E31: Accepted. However, From 2017 EU Legislation will specify that new build and major renovations of buildings will need to be high speed ready, whilst the focus of the National Planning Policy Framework states that 'in preparing Local Plans, local planning authorities should support the expansion of	<p>Page 54 Delete policy TC7, and replace with: 'POLICY TC7 Liskeard Town Centre Broadband and WiFi'</p> <p>'New retail, service, business and live-work accommodation (whether provided through new development or conversion) located within Liskeard Town Centre (as shown on the</p>

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		development. Recommend deletion.	electronic communications networks...' (Para 43). Planning authorities around the country are successfully including planning policies supporting such networks. Bearing this in mind and in the context of Liskeard's urgent need to modernise its town centre 'offer', it is considered that a policy requiring the provision of Broadband and Wi-Fi is justified. Amendment proposed.	<p>Proposals Map Inset) shall be provided with a superfast fibre connection, or ducting to facilitate such connection when it becomes available.</p> <p>Page 54 column 2 delete text of section on Policy TC7 and replace with:</p> <p><i>'Retail change over the next decade will be technology driven, largely focusing around the use of IT, WiFi and 4G in which mobile, online and in-store experiences complement rather than compete with one another. Therefore provision of broadband infrastructure within premises in the town centre is vital to facilitate the provision of a public WiFi service under Project TC5, essential if the town centre offer is to keep up with its rivals, enhancing vitality and viability, and attracting additional investment.'</i></p> <p><i>High street WiFi is not simply a 'service' to town centre visitors: 'Near me' and SEO services in Google and Bing, which can point customers to local businesses, providing they have a website. Some 80% of searches on smartphones are for local businesses, and 78% of these turn into local offline purchases. Mobile phone service operators are increasingly looking to 'offload' data demand to keep their</i></p>

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				<p><i>service speeds up to scratch, so are also looking to invest in town centres</i></p> <p>On page 55, Project TC5, delete text, replace with:</p> <p>‘ To support the creation of a public WiFi service and enhanced web presence to assist the town centre offer to keep up with its rivals giving the opportunity to generate revenue, attract more visitors, keep visitors for longer periods, and keep a competitive edge.</p>
POLICY TC8 - Design of New Development in The Town Centre and Liskeard Conservation Area	B9[6], C7[5], C83[1], C101	B9[6], 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. C7[5], C83[1] Strong support C101 Also good to see protection of our heritage and landscape assets around the edge of the town as well as buildings in the centre.		
POLICY TC9 - Shopfront and Other Commercial Signage in The Town Centre and Liskeard Conservation Area	C7[5], C83[2]	C7[5], C83[2] Strong support		

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POLICY TC10 - Shop Fronts in The Town Centre and Liskeard Conservation Area	No comments received			
POLICY TC11 - Local Listing of Buildings of Significance in The Town Centre and Liskeard Conservation Area.	E32[1], E32[2]	E32: Refer to locally listed buildings as 'non-designated heritage assets' Identify them more clearly on a larger scale map. This is not a policy.	<p>E32[1] Accepted. Amendment proposed.</p> <p>E32[2]: Heritage England guidance indicates that a local heritage list may be produced as Supplementary Planning Document (SPD), and that Local Plans can then include policy on locally local listings. (Historic England advice note 7: Local Heritage Listing May 2016 p6, para 17 and 18). It is also stated that '..work in preparing a Neighbourhood Plan may indicate buildings and sites which merit inclusion on the local list'. We see no reason why local listing should not be done through an NDP instead of SPD. However, for the sake of clarity amendments are proposed.</p>	<p>Page 57 policy TC11: delete title and change to: 'Local listing of non-designated heritage assets in the town centre and Liskeard conservation area'</p> <p>Reword policy as follows:</p> <p>'The following buildings and grounds are locally listed as being of architectural significance, local distinctiveness and character and historic importance:</p> <p>a) St Malo, Varley Lane b) Hollywood, Russell Street</p> <p>Proposals impacting on these buildings and grounds will be considered under CLP Policy 24 'Historic environment'.</p> <p>From time to time additional sites may be locally listed, in which case NDP Policy TC11 and CLP Policy 24 will apply to them.</p> <p>Page 58: Policy TC11 justification, after '...set by Historic England add: (advice note 7: Local Heritage Listing May 2016 p6): 'work in preparing a Neighbourhood Plan may indicate buildings and sites which merit inclusion on the local list'.</p>

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POLICY TC12 - Retention and Enhancement of Heritage Assets	C48, E33	C48: Support, E33: repeats strategic policy (CLP Policy 24: historic environment).	C48, support welcomed. E33: Accepted. Amendment proposed.	<p>Page 57: Remove 'POLICY TC12' and reference to it in the reasoned justification (top of column 2).</p> <p>Insert in box: shaded, but use paler colour as for 'objectives' rather than 'policies'</p> <p><b><i>Retention and Enhancement of Heritage Assets</i></b>  <i>Cornwall Local Plan Policy 12 says that Proposals for development should protect, conserve and enhance the significance of designated and non-designated assets and their settings including the character and appearance of Conservation Areas, historic landscapes and townscapes, and the industrial mining heritage. Proposals which affect or involve heritage assets must be accompanied by an assessment of the significance of the asset and the impact of the proposal upon its significance and identifying mitigating measures to be incorporated into the development as necessary. For Liskeard, heritage assets are statutorily listed and locally listed buildings, unlisted buildings designed by noted local architects and builders or related to the Cornwall and Devon mining Landscape World Heritage site.</i></p>

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POLICY TC13 - Maintenance and Improvement of Buildings and Public Realm in The Town Centre	E34	E34: Some of the proposed works will not require planning permission, the design principles could be better related to policy H10.	E34: Accepted, but many will come under planning control or need listed building consent, or advertisement consent, when associated with a development. They will also be relevant to work not requiring formal permission or consent, which is recognised in the comment following the policy. It is practical to cover all these eventualities in one place.	Page 59: Renumber policy TC13 to: POLICY TC12 and in consequential changes on Page 61, in Reasoned justification, and in Comment
<b>A Place to Relax and Enjoy 62 - 79</b>	C1, C7[6], E35	C1: questions the adequacy of a range of facilities. C7[6] strong support E35 Supportive of the policy approach in particular the focus on provision of walking and cycling and public transport links and improvements	(C1) The Plan seeks to provide planning policies that will address such inadequacies.	
POLICY OSL1 - Green Spaces	C10[1], C38[1], C99	C10[1], C38[1], C99: Support. E36: put the numbers on the map. Page64 lists & numbers green spaces, but there is no annotation on the map on page 94.	E36: Accepted. Unfortunately, the scale at which the maps were printed caused site details to be suppressed by the software. A larger scale Proposals Map with detailed insets is necessary.	Page 64 Amend title to read: Policy OSL1. Detailed Proposals Map insets to be included. Page 64 bottom row of table – renumber from OSL15 to: 'OSL6' Page 67 Amend first para of reasoned justification to read: 'These areas are of particular importance to the local community and fulfil the requirements of the NPPF for Local Green Space designation in that each green space...'continue as before to end of c) Below this add new paragraph: A full up to date robust assessment of

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				<p>open spaces in Liskeard was carried out in 2015 using the Green Flag assessment procedure (available here <a href="http://bit.ly/2nwg7sk">http://bit.ly/2nwg7sk</a>).</p> <p>Page 70: table: Renumber Roundbury park reference to 'OSL6', throughout the table where it is called OSL9. <u>Retain</u> ref to 'former Caradon Local Plan Alt 15' in first box, but delete Alt 15 throughout rest of table.</p> <p>Add '..allocated..' to</p> <p>Update figures in last two columns of chart.</p>
POLICY OSL2 - Conservation, Enhancement and Creation of Local Green Spaces and Other Parks and Green Spaces to Accommodate Growth	C10[2], C72, C73, C38[2], A1[3], A1[4],	C10[2], C72, C73, C38[2]: Support A1[3]: The policy should make specific reference to need to conserve & where possible enhance areas designated as Ancient Woodland and Priority Habitat deciduous woodland, with a referencing plan. A1[4]: The policy should make specific reference to Local Wildlife Sites for the conservation and enhancement of biodiversity / ecological assets, and shown on a plan.	C10[2], C72, C73, C38[2]: support welcomed. A1[3], A1[4]: Accepted	<p>Page 56 in text: at end of c): after '..landscapes' change to 'both into and out of the town.'</p> <p>f) change to 'Conserving and enhancing biodiversity....' Replace 'vegetation' with 'ancient woodland, priority habitat deciduous woodland...'</p> <p>On Proposals map: Show High Wood and New Plantation Ancient Woodlands, and Priority Habitat Deciduous Woodland Areas on a separate inset from the Proposals Map covering Policy OSL 2 (See Figure A below). Include 'Open space, Biodiversity and Heritage Show Halbathick Wood and Keasts Park Wood County Wildlife Sites on the OSL2 Proposals Map Inset (See Figure Below).</p>



**TABLE 2: COMMENTS MADE ON SPECIFIC THEMES, POLICIES AND TEXT OF THE LISKEARD NEIGHBOURHOOD DEVELOPMENT PLAN**

PLAN SECTION	RESPONSE REFERENCE	SUMMARY OF ISSUES RAISED	STEERING GROUP RESPONSE	PROPOSED AMENDMENT TO NDP IF REQUIRED
				Show biodiversity corridors (as in infrastructure report), Cherished Views and Ducal Deer Park on map.
POLICY OSL3 - Play provision in neighbourhood areas	C94, D2[17], E37[3]	<p>C94: What is happening to the closed play areas - Henfordh Grange; St Martins court?</p> <p>2 or more bedroom condition increases complexity of enforcement</p> <p>D2[17]: Support but note table is based on dwellings rather than numbers of residents, Unlikely that LAP will be required where less than 10 dwellings, or LEAP where less than 30. E37[1]: : Various comments on suitability of sites and nature of 'natural play facilities'. E37[2]: 2 or more bedroom condition increases complexity of enforcement. E37[3]: The Appendix [e] referred to in the table of Local Open Space Standards is missing. E38: The tables (bottom p65 &amp; 66) - generic FiT standards do not accord with Policy 12.3 of the Local Plan.</p>	<p>C94: Discussions are taking place with the responsible authority to resolve these issues.</p> <p>D2[17]: Noted. Amendment proposed (see E38 below). E37[1]: These are complex issues on which there currently differing interpretations that will require discussion, and an update of the CC Strategy is due. Pending these discussions, it is appropriate that the policy remains as it stands (apart from amendment mentioned below). E37[2]: Accepted and amendment proposed.</p> <p>E37[3]: Accept that appendix is missing. Note that words 'standard calculations' are spurious. E38: Accepted. Deletion of tables proposed.</p>	<p>OSL3 - Remove final sentence of 2<sup>nd</sup> Paragraph.</p> <p>Page 65: Table of Quantity Benchmark Guidelines – Delete</p> <p>Page 66: Table of Open Space Standards – Final paragraph – delete words 'standard calculations' and at end of section, Insert ' in Open Space Working Group Report, Appendix E lists..... '</p> <p>Page 66 bottom: Table of Minimum Play Sizes - Delete</p>
POLICY OSL4 - Public Realm Access and Circulation Improvements	C10[3], C33, C70, E39	<p>C10[3] Support - 1. Create a circular pedestrian and cycle friendly (i.e. off road) around Liskeard with spokes coming into Town Centre. 2. Venslooe Hill currently heavily used by</p>	<p>C10[3], C33, C70: Support noted. E39: Not accepted. If retained Policy LISK5 is a policy so is this. Amendments proposed to ensure is seen as a policy.</p>	<p>Page 68 policy OSL4: Change title to: 'Locations for enhanced public realm access and environmental improvements'</p> <p>1<sup>st</sup> Paragraph: Insert after</p>

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		pedestrians, cyclists and horse riders and needs to be retained as a quiet lane. This is the only quick route into the countryside from the town centre. C25, C70 frequent hopper bus service (to and from the station) is needed. C33 Cycle racks at top of Baytree Hill area E39: This is a Project and not a Policy.		<p>'...implemented': 'Contributions will be sought towards works from development in the town as all development directly affects the town's public realm'.</p> <p>Clause b), after 'Bay Tree Hill' insert: 'in accordance with CLP retained policy (Lisk 5 - former Caradon Local Plan), with possible timed road closures.'</p> <p>Add new Clause d) 'Pedestrian and cycle links between the Station and the Town Centre.'</p> <p>Page 69: Reasoned justification at beginning, insert; Land use planning has a key role in delivering the Connecting Cornwall Transport strategy. By shaping the pattern of development and influencing the location, scale, density, design and mix of land uses, planning can help to reduce the need to travel, reduce the length of journeys and make it safer and easier for people to access jobs, shopping, leisure facilities and services by public transport, walking, and cycling. The way we design and use public spaces also helps tackle climate change and health and well-being.'</p>
POLICY OSL5 - Open Space and Developer Contributions Developers of Housing	B3, B4, D2[18],E40	Support for bringing forward additional pitches for Cricket, Football and Rugby, (plus facilities for Tennis, and Hockey). D2[18]: To meet CIL regs, policy should say that contributions	B3, B4, Noted and support welcomed. D2[18]: Noted, but it is not though necessary to add this detail. E40: Noted. It is the intention of the Town Council to take a greater role in such	<p>Page 69 correct objective 7, to objective 4, and adjust all following objective numbers</p> <p>Policy OSL5: Amend clause last</p>

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Reasoned Justification  Comment	E41  E42	will be sought to extend or improve existing facilities as a direct result of proposed development, and not be sought towards maintenance. Timing of provision is a matter for S106 agreements. E40: OSL5 para2 would require the town council to be written in as a party to the s106, which although is not without precedent could create significant issues. E41: Uses out of date figures. The CC OS Strategy requires 44sqm/person and will be refreshed shortly.	matters, and may where necessary and appropriate take on such obligations. E41: Accept new figures which are now available. E42:	paragraph of Policy OSL5 to replace 'will' with 'may' on both occasions.
POLICY OSL6 - Meeting the Communities Need for Sports and Leisure	B2[1]  B3, B4  C3[2] B9[4], C86[1]  C97[1]	Particularly pleased to see reference in the supporting text to inclusion of a 'running track' as part of the facilities which may be provided at Roundbury Park.  Support for bringing forward additional pitches for Cricket, Football and Rugby, (plus facilities for Tennis, and Hockey).  Open spaces a town needs parks somewhere to walk and for picnicking, large area of land set aside for recreational use is an excellent idea  Support	Noted and support welcomed.	
POLICY OSL7 - Provision of Orchards and Allotments	C10[5], C95 D3[6], E42	C10[5] As modern houses all seem to be now built without gardens, the need for many more allotments is crucial. Community orchards and /or forest gardens should be a mandatory	C10[5]: Cannot be mandatory, but can be negotiated as part of a developer contribution where it justified. D3[6]: Not accepted, the location has been subject to consider able development	Page 71: Policy OSL7: First line: replace 'conserve' with 'protect': after 'developer contributions' add: 'on or offsite at Maudlin farm, Woodgate Rd, Culverland Rd, Charter Way, Tencreek

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		part of any new developments. C95, C104 Support. D3[6]: 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. E42: What is the developer required to do? Is it provision of land within schemes, or contributions? Not clear and contributions are strategic and pooling will affect ability to provide. (see also comments from Open Spaces team) P72 – Comment – para1 – this does not accord with government rules imposed on s106, whereby only developments in urban areas of 11 & more can be required to make off-site contributions. It is my understanding that substituting this to a planning condition would not be permissible.	recently and now needs green space to be provided.	and Addington’ Change figure from 42 to 43 sq m/person  Page 72: under comment: Change ‘small’ to ‘smaller’ and ‘less than 5’ to ‘11 or more’.
POLICY OSL8 - Routes and Settings of Caradon Trail, Liskeard Caradon Railway World Heritage Site and Looe Valley Cycle Trail	C10[6], C59{1}, E43	C10[6], C59{1}: Support - An off-road moor to shore cycle and pedestrian route (Looe to Minions) would provide essential amenities, and attract visitors to the town. E43: Can the corridors be protected as green space? The map does not appear to show all the trails listed and it is not clear whether all these areas are within the NDP area.	C10[6], C59{1}: support noted. E43: Accepted. Amendment proposed.	Page 72 policy OSL8: in text, after: ‘settings of the...’ – insert: ‘designated Caradon Trail (green corridor)..’ in the text. Amend footpath/cycleway/trail map to indicate Liskeard-Looe Valley Trail. Use separate colour-code/key for small sections outside NDP boundary. page 72, after Project 7 Roundbury Park, add new: Project 5 Allotment and

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				community orchard plan.
POLICY OSL9 - Dark Sky	C10[4], C103, E44	C10[4] C103: Dark skies very important, Liskeard already over illuminated by sports pitches. New leisure facilities have downward facing flood lights and existing ones changed. E44: Streetlights don't require planning permission. Could this be included in design policy?	C10[4] C103: Support noted. E44: Streetlights are provided under planning and S278 and 38 agreements that are implementations of highway proposals agreed through planning policy so it is entirely appropriate to include this here and seek to steer highways development management with an awareness of their impact on skyglow	
POLICY OSL10 - Area of Local Landscape and Heritage Value	C5[2], C39, C96, C106, C107, D2[19], E45	C5[2] Particularly like policies protecting the hinterland as a leisure area. C39 justification needs strengthening by including the most up-to-date Cornwall Historic Environment data (Caradon Hill Area Heritage Project mapping showing e.g. medieval farming landscape/fields, ducal deer park and numerous buildings / structures with medieval origin), and community engagement event where	C5[2]: Support noted. C39, C96, C106, C107: Agreed. D2[19]: Not accepted, the designation is made because of the value of the site in landscape and heritage terms, and not as a means of preventing sustainable development. Recent data indicates that the significance and importance of the area is in fact greater than originally perceived. Paragraph 2.146 in preamble to policy 22 of the CLP indicates intention to review AGLVs.	Justification needs strengthening to include most up-to-date Cornwall H E data – CHAHP project mapping and reference OS WG study and community engagement on area of local significance -  Page 74 policy OSL10 line 6:Change to: 'Within this area, any development which is permitted should recognize...' Insert at end of Reasoned justification

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		<p>the Working Group's study of the area was open to public scrutiny and received support as an area of local significance. C96, C107 Need to indicate publicly accessible view-points/cherished views/landscapes that are valued in the locality. C106: Support. D2[19]: Object. Proposed landscape designation is not justified by the evidence base, and would impose an unreasonable constraint to the future development of a key settlement in the Cornwall Local Plan. Therefore it would not be appropriate having regard to national policy (NPPF, 14, 16, 47, 156, 159, 184), basic condition 8(2)(a). The policy seeks to frustrate the achievement of sustainable development, contrary to basic condition 8(2)(d). The policy would also not be in conformity (general or otherwise) with any strategic policies in the development plan, contrary to basic condition 8(2)(e).</p> <p>E45: reference to permitted development is confusing</p>	<p>C96, C107: Accepted. Amendment proposed.</p>	<p>para 4 OSL10: The Cornwall Local Plan describes Liskeard's setting 'on its hilltop, overlooking wide tranches of landscape as an important characteristic" and In recognition and regard for our local designated AGLV's there is support in policy 22 for providing a strong statement on their extent and significance; "to inform and produce strong revised statements of these local designations of landscape value".</p> <p>As part of the WHS initiative, the Caradon Hill Area Heritage Project, supported by the Cornwall Historic Environment Service, carried out a detailed study of the area from the North of Liskeard to the mining site at Caradon Hill, which indicates that the whole area is medieval in terms of field structure, landscape and farming settlements, including the site of a large ducal deer park.</p> <p>The above is reinforced by the Open Space Working Groups community engagement event, where their study of the area was open to public consultation and received support as an area of local significance.</p> <p>Proposal Map: indicate Heritage info and publically accessible viewpoints / cherished view locations on map with</p>

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				<p>appropriate notation.</p> <p>Page 75: Insert new policy OSL 11: <b>'Cherished Views</b>. Any development proposals affecting the Cherished Views set out in this document must demonstrate the impact on the Cherished View by providing an analysis through an accurate visual representational assessment and statement*. Such statements must set out a description of the Cherished View and describe the nature of the impact or harm to the View from the proposals, taking into account the cumulative impact on the view, caused by any existing unimplemented development proposals and identify any mitigating measures to be incorporated into the development as necessary.</p> <p>*These will normally be set out in the Design and Access Statement or Environmental Statement accompanying a planning application. Each should consider the impact of the view taking into account the foreground, middle ground and background impacts</p> <p><b>Reasoned Justification.</b> The existence of particular and familiar views adds to peoples' enjoyment of their locality, their sense of place and local</p>



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				<p>distinctiveness, and even their sense of belonging to a particular place and community. Such views can become cherished because of the presence of distinctive buildings in the townscape and landscape, or because they frame the setting for people's everyday existence within their community and family life, having value as the place where their life experiences occur and giving a sense of permanence and continuity. They may underpin local diversity and character, or project national identity in a locally relevant way. This 'attachment to the ordinary landscape' has important implications for psychological and thereby to social well-being, and is an essential element in sustainable development.</p> <p><b>Comment:</b> The 'Open Space' Working Group has examined the landscape and townscape of Liskeard and through its workshop meetings and consultation have identified cherished views for Liskeard.</p>
POLICY OSL11A - Pedestrian, Equestrian and Cycle Links and Corridors Project 3	B2[2], B5[9], B8[4], C5[1], C7[7],	B2[2], B8[4] Plan should recognise that pedestrian, equestrian and cycle routes provide opportunities for joggers, runners and others wanting to improve their fitness. with exercise	B2[2] & B8[4] Accepted B5[9] Only the routes within the Designated Area of the NDP can be shown, so it appears some end abruptly. However, it is appropriate to	Page 76: Renumber rest of policy numbers to fit with new policy OSL11: Add following sentence to Comment: 'Opportunities to provide 'fitness trails' with exercise equipment suitable for

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	C8[2], C26, C47, C50, C59[2], C75, C76, C100, C102, E46	<p>equipment placed at intervals for residents to use at any time of the day or evening. Existing footpaths, cycleways could be readily adapted and new ones designed into future developments.</p> <p>B5[9] Proposed Quiet Lanes either end abruptly in narrow unpaved roads well used by vehicles or include main roads like the A390</p> <p>C5[1] Idea of planting tree-lined boulevards along some streets sounds wonderful - visually attractive on approach to town and great for wildlife and environment. Support quiet lanes concept. E46: not clear on map – not all listed</p> <p>C7[7] Strongly support - Encourage the negotiation of PERMISSIVE ROUTES for walkers, cyclists and horse riders</p> <p>C8[2] Agree with linking all outlying areas of housing with the centre of the town via safe cycleways and walkways</p> <p>Crossing end Gypsy Lane to Limes <b>C26</b> Lane should be a footbridge. C47, C66 Proposed crossings of New Rd must be uplifted from proposed and actually built</p> <p>C50 Charter Way Road: Extend the pavement from Peppers Park entrance to Morrisons, the bubble, Premier Inn and proposed Tencreek</p>	<p>show the continuation of quiet lanes and other proposed routes where they extend beyond the Designated Area. Also, there is a mapping error showing a quiet lane on the busy road. C5[1], C7[7], C8[2], C26, C47, C50, C59[2], C75, C76, C100, C102, E46: Support and suggestions/ideas welcomed.</p>	<p>unsupervised use at appropriate intervals should be considered.'</p> <p>Add to listing in Project 3 on Page 77: 'g) 'fitness trails' with exercise equipment suitable for unsupervised use at appropriate intervals'</p> <p>Proposals map: Show the continuation of routes outside the Designated Area as 'Suggested Routes outside the Designated Area'. Remove mapping error.</p>

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PLAN SECTION	RESPONSE REFERENCE	SUMMARY OF ISSUES RAISED	STEERING GROUP RESPONSE	PROPOSED AMENDMENT TO NDP IF REQUIRED
		development etc. Liskeard people need encouragement to get fit! Walking exercise is key. C75 Cycle way through Sungirt C76 Needs somebody to tell home owners to keep their vegetation off public footways - some are becoming impassable. C100 Footpath needed on Charter Way, safe path from Liskerrett area to Morrisons C102 Support and cycle-friendly round-Liskeard trail - with connections into the town centre, extending to Minions and Looe		
POLICY OSL11B - Protection of Pedestrian, Equestrian and Cycle Links and Corridors	<b>C7[8]</b>	C7[8] Strongly support	C7[8]: support welcomed.	Page 76 policy OSL11B End of policy, add: 'Further protect trail routes by seeking Quiet Lane status'
POLICY OSL12 - Protection of Existing Cultural, Community, Arts, Recreational and Sports and Leisure Facilities	C7[9], C78	C7[9] Strongly support. C78: support for retention of Liskerrett Centre	C7[9], C78: Noted.	
POLICY OSL13 - Provision of Additional Cultural, Community, Arts, Recreational and Sports and Leisure Facilities	B8, C2, C7[10]	B8. Young people seek a cinema where they could get the whole experience, the sound, the big screen etc C2. Leisure is also an important priority modern theatre/cinema with small eating places open in the evening in the town centre C7[10] Strongly support	The proposed mixed use development at Tencreek, outside but immediately abutting the Plan Designated Area, includes provision for a full-scale commercial cinema. However it will only come forward if it is seen to be a commercially viable opportunity by a cinema operator. The Neighbourhood Plan and the two Councils responsible for the area, do not have the legal	

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			power to <i>require</i> developers to build and/or operate such a facility, and nor is public subsidy likely to be available. Therefore, the Neighbourhood Plan can only include policies which support the provision of space for a cinema in any redevelopment.	
Project 6 – WHS Interpretation and Local Marketing	B5[8]	There are implied impacts for the World Heritage Site outside of the boundaries of Liskeard and Bodmin Moor on Common Land where the moorland is under threat from leisure use which could impact on the heritage features and damage the general beauty of the area.	Project 6 specifically refers to interpretation, education and awareness raising of the WHS, and implicitly must operate within the requirements of the <u>WHS Management Plan</u> . This seeks to ensure that heritage assets are protected, conserved, presented and transmitted to future generations, in line with the obligations set out in the UNESCO Convention for the Protection of World Cultural and Natural Heritage (1972). By implication the settings for these assets must also be respected.	Page 79: Project 6 - Extend the first sentence after 'surrounding countryside...' with '...in accordance with the requirements of the WHS Management Plan'.
<b>A Place with A Sustainable Future 80 - 83</b>				

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POLICY SUS1 - Sustainable Development Standards	D2[20], E47	D2[20]: Supports policy but clarification is required as to what is being sought from the policy in terms of the use of renewable energy sources, and the use of sustainable water sources. In particular it should be considered whether such requirements are justified and viable. E47: Will all new development have to respond to all the criteria? It may be better to have a threshold where this applies. The policy is very prescriptive and not all elements will always be appropriate.	D2[20]: Accepted in regard to renewable energy, amendment to give more detail in the 'Comment' supporting the Policy. E47: It is intended that all criteria should apply.	<p>Page 83: After comment, insert: Proposed heating and cooling systems should be selected in accordance with the following order of preference:</p> <ul style="list-style-type: none"> <li>• Passive design</li> <li>• Solar water heating</li> <li>• Combined heat and power for heating and cooling preferably fuelled by renewables</li> <li>• Community heating for heating and cooling</li> <li>• Heat pumps</li> <li>• Gas condensing boilers and</li> <li>• Gas central heating.</li> </ul> <p>Larger developments should consider the generation of a proportion of the site's electricity or heat needs from renewables, wherever feasible.</p>
POLICY SUS 2 - Improved Communications	E48	E48: This isn't a policy – and cannot be required by policy. Move to supporting text.	E48: Accepted. Amendment proposed to turn into a land use policy.	<p>Page 83: Replace Policy SUS2 with: 'New live-work or business accommodation sites shall be provided with a superfast fibre connection, or ducting to facilitate such connection when it becomes available.</p> <p>Where proposals from mobile phone network operators to improve mobile coverage require planning permission, they will be supported where:</p> <ol style="list-style-type: none"> <li>i. the applicant has fully explored the opportunities to</li> </ol>

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				<p>erect apparatus on existing buildings, masts or other structures;</p> <p>ii. the numbers of radio and telecommunications masts are kept to a minimum consistent with the efficient operation of the network and have been sited and designed to minimise the impacts on local character.</p> <p>Where proposals are in particularly sensitive areas, applicants will be required to provide additional information to support their application through means including photomontages, accurate visual imagery to industry standards or maps demonstrating sightlines’.</p> <p>Comment: Generally full planning permission is only required if a mast is greater than 15 metres in height (although there are some exceptions). New masts below this height are dealt with under Part 24 of the General Permitted Development Order (Amendment)(England)(2001). Other telecommunications development may be erected on buildings or on existing masts, in these cases planning permission may not be required, subject</p>

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				to criteria set out in the Order.
<b>Delivery Plan 84 - 90</b>				
POLICY DP1 - Community Priorities	E6, E7	<p><u>E6 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. <u>E7 CIL:</u> Provides a description as to how S106 and CIL interact and will function. The process for allocating the remainder of CIL across Cornwall (the portion which is not automatically devolved to Town and Parish councils) has not yet been decided but local priorities endorsed in a NDP are good evidence of community support. E49: DP1 is not a policy. See comments about S106 and contributions in general comments section. ‘With regards outdoor space specifically, the Council’s Open Spaces team have indicated that they would expect funding for the following to be sought from CIL income (and therefore unable to be sought via a planning obligation):</p> <ul style="list-style-type: none"> <li>Types 3 and 8: provision of outdoor sports open space for community use – the creation or enhancement of formal sports</li> </ul>	<p>E6, E7: Considering these and earlier representations, it is clear that the Delivery Plan section of the NDP needs to be recast and updated, in the fullness of time with the inclusion of a further table identifying CIL ‘neighbourhood priorities’, and identifying for local users what will be S106 and the CIL ‘strategic’ priority themes will be (if this is known by publication date).</p> <p>This will be done at a later stage in consultation with TC and Steering group, and community input, when CIL and 106 contributions are clarified by Cornwall.</p>	<p>Reorganise section as follows:</p> <p>Amend Objective 1 to read:</p> <p>‘To deliver this Neighbourhood Development Plan and the community aspirations it embodies by taking action on the tasks, organising resources and making the best use of funding streams through planning obligations, grant aid and public investment’.</p> <p>Insert new Comment: ‘Table 1 sets out the policies and proposals of this NDP, identifying the tasks necessary to ensure that the plans intentions are delivered, and identifying the key organisations involved in that delivery. It forms the basis for partnership working’.</p> <p>Insert Table 1</p> <p>POLICY DP1 – Community Priorities</p> <p>‘The use of Community Infrastructure Levy, planning obligation funding, grant aid and investment in the town should be directed towards the developments,</p>

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PLAN SECTION	RESPONSE REFERENCE	SUMMARY OF ISSUES RAISED	STEERING GROUP RESPONSE	PROPOSED AMENDMENT TO NDP IF REQUIRED										
		<p>pitches and outdoor sports facilities.</p> <ul style="list-style-type: none"><li>• Type 5: provision for teenagers – creation or enhancement of formal and equipped areas for teenagers.</li></ul>		<p>projects and initiatives detailed in this Neighbourhood Plan.</p> <p>Community Infrastructure Levy receipts by the Town Council will be directed towards support for the Projects set out in Table 2. Given the uncertainty on when CIL receipts will become available, the priority and level of support will be determined on an ad-hoc basis by the Town Council in consultation with the local community.</p> <p>The use of Community Infrastructure Levy receipts by Cornwall Council that are directed to the Liskeard Neighbourhood Plan area should provide funding for the strategic open space requirements set out in policy OSL5, and the projects set out in table 2 below, recognising the Town Council/community prioritisation of them.</p> <p>Insert renumbered Table 2</p> <table><tr><th>Projects</th><th></th></tr><tr><th>New Name</th><th>Old name</th></tr><tr><td>Project A (EM)</td><td>EM1</td></tr><tr><td>Project B (EM)</td><td>EM2</td></tr><tr><td>Project C (EM)</td><td>EM3</td></tr></table>	Projects		New Name	Old name	Project A (EM)	EM1	Project B (EM)	EM2	Project C (EM)	EM3
Projects														
New Name	Old name													
Project A (EM)	EM1													
Project B (EM)	EM2													
Project C (EM)	EM3													

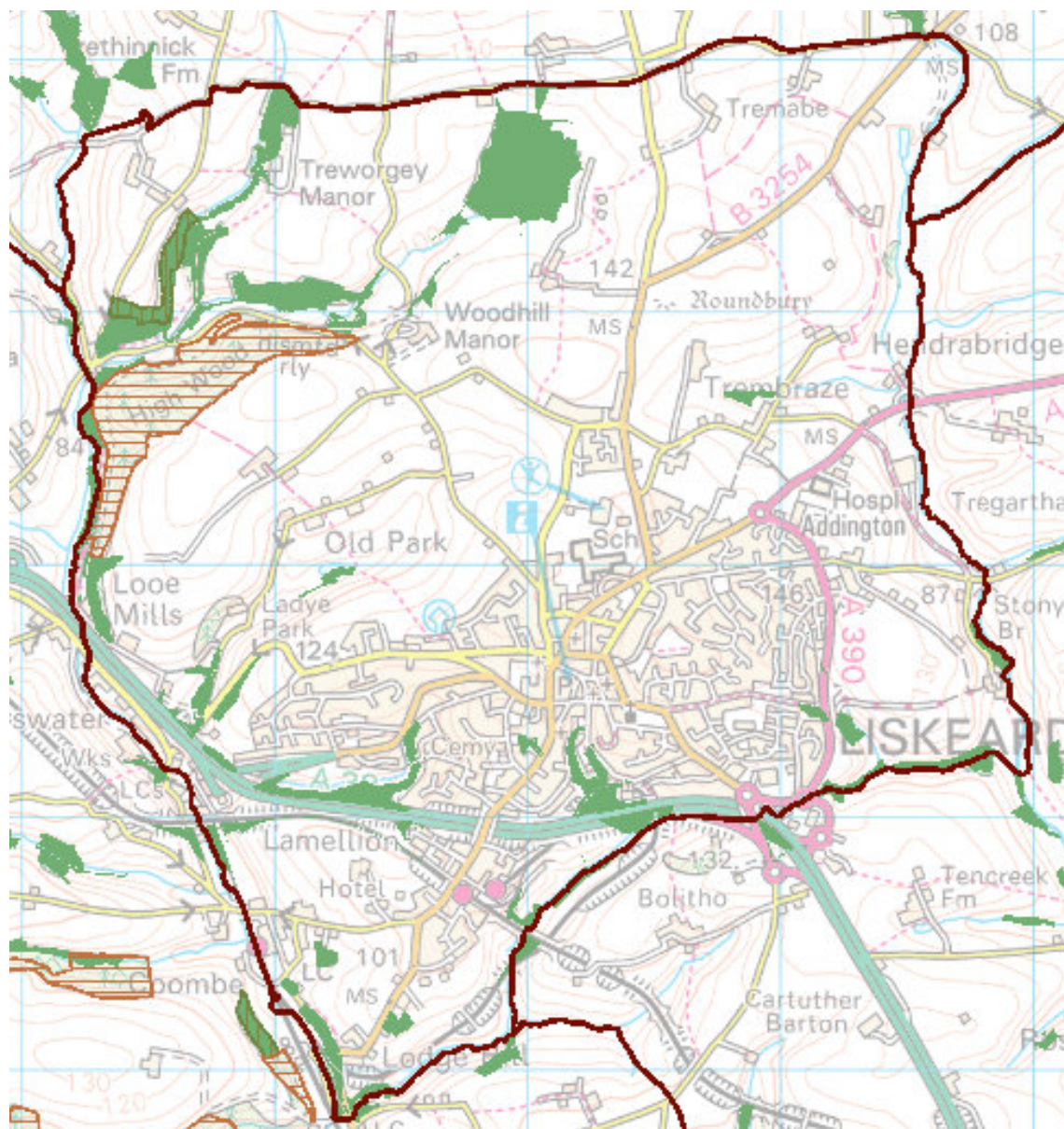


**TABLE 2: COMMENTS MADE ON SPECIFIC THEMES, POLICIES AND TEXT OF THE LISKEARD NEIGHBOURHOOD DEVELOPMENT PLAN**

TABLE 2: COMMENTS MADE ON SPECIFIC THEMES, POLICIES AND TEXT OF THE LISKEARD NEIGHBOURHOOD DEVELOPMENT PLAN						
PLAN SECTION	RESPONSE REFERENCE	SUMMARY OF ISSUES RAISED	STEERING GROUP RESPONSE	PROPOSED AMENDMENT TO NDP IF REQUIRED		
				Project D (TC)	TC1	
				Project E (TC)	TC5	
				Project F (TC)	TC2	
				Project G (TC)	TC4	
				Project H (TC)	TC3	
				Project I (OSL)	OSL1	
				Project J (OSL)	OSL2	
				Project K (OSL)	OSL7	
				Project L (OSL)	OSL5	
				Project M (OSL)	OSL3	
				Project N (OSL)	OSL8	
				Project O (OSL)	OSL4	
				Project P (OSL)	OSL6	
				Project Q (SUS)	SUS1	
				Project R (SUS)	SUS2	
					Move paragraph on timescales to precede policy DP 1	
				Table 1 – Policies and Proposals	No comments received	
Table 2 - Projects	No comments received					
Glossary Page 90 - 91	No comments received					
Maps Page 92 - 95	E5, A1[5], C85[3],	E5, A1[5], D1[8]: Proposals map: The proposals maps needs to be clearer	E5, A1[5], D1[8]: Accepted. Unfortunately, the scale at which the	Prepare a larger scale Proposals Map with detailed insets.		

**TABLE 2: COMMENTS MADE ON SPECIFIC THEMES, POLICIES AND TEXT OF THE LISKEARD NEIGHBOURHOOD DEVELOPMENT PLAN**

PLAN SECTION	RESPONSE REFERENCE	SUMMARY OF ISSUES RAISED	STEERING GROUP RESPONSE	PROPOSED AMENDMENT TO NDP IF REQUIRED
	C90[1], D1[8]	<p>and have larger scale sections to show the extent of allocations referred to in housing, employment and town centre policies along with policy references. It is also hard to tell whether some of the green space designations referred to extend beyond the NDP area.</p> <p>C85[3] on proposals map - shades of green (green spaces, AGLV etc. are confusing, particularly around cemetery &amp; old magistrates court.)</p> <p>C90[1] does map p11 need copyright licence no.?</p>	<p>maps were printed caused site details to be suppressed by the software. A larger scale Proposals Map with detailed insets is necessary.</p> <p>C8[3], It is appropriate to show the continuation of quiet lanes and other proposed routes where they extend beyond the Designated Area. However it is agreed that these should be clearly indicated as having the status of 'Suggestions' only. When they are outside the NPD area then will have advisory status only unless that parish adopts them in a NP.</p> <p>C90[1] OS Copyright notice is given on website and in public display maps, but should be on pdf documents as well.</p>	<p>Show the continuation of routes outside the Designated Area as 'Suggested Routes outside the Designated Area'.</p> <p>Include OS Copyright notices as required.</p> <p>Incorporate changes to development boundary as required from comments on Policy NP1.</p>

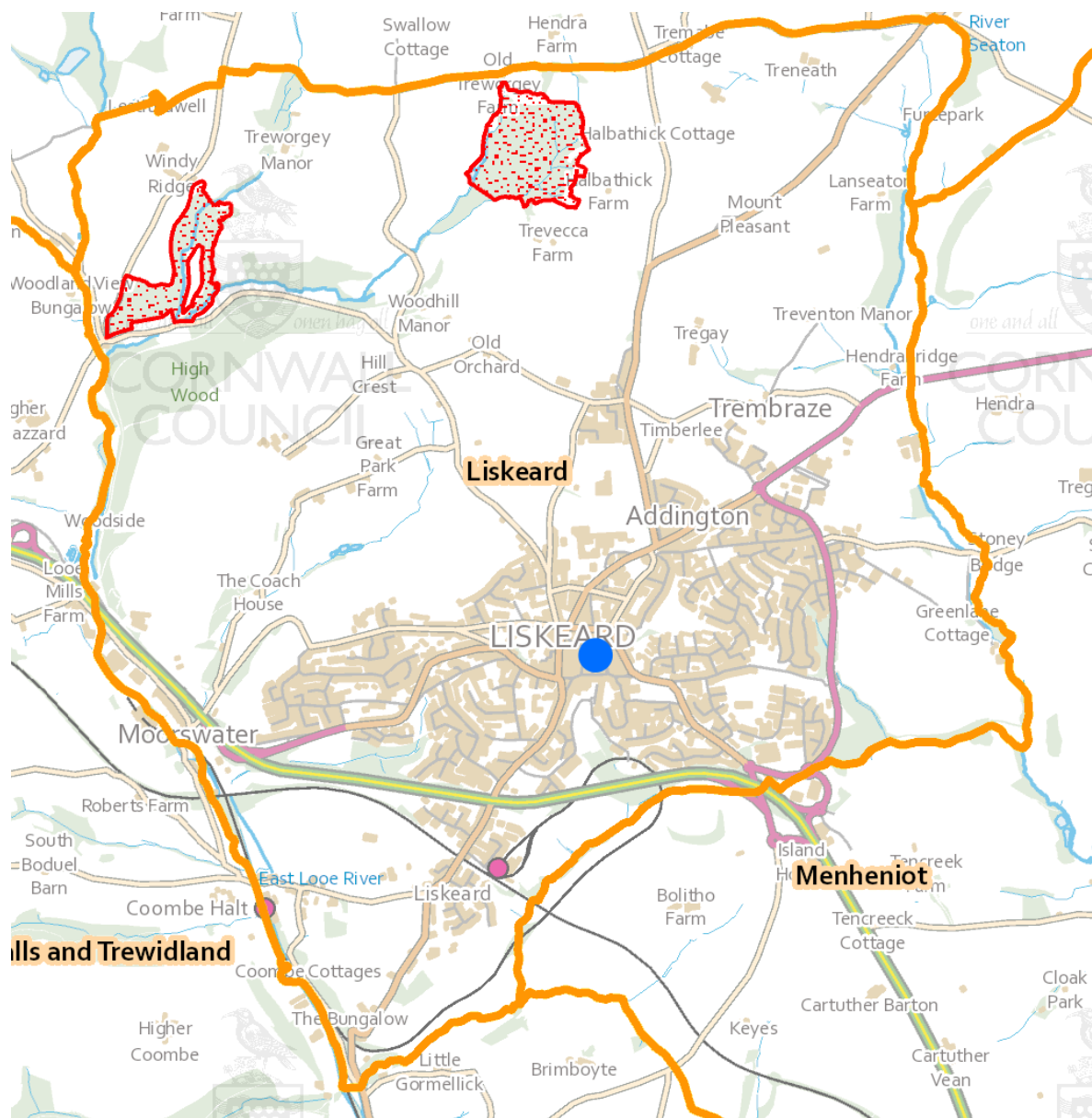


**FIGURE A: ANCIENT WOODLANDS AND PRIORITY HABITATS**

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

### Legend

- Parishes (GB)
- Ancient Woodland (England)**
  - Ancient and Semi-Natural Woodland
  - Ancient Replanted Woodland
- Priority Habitat Inventory - Deciduous Woodland (England)



**FIGURE B: COUNTY WILDLIFE SITES**  
Halbathick Wood and Keasts Park Wood  
County Wildlife Sites to be inserted on the  
OSL2.

## Appendix A.

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

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

Statutory Organisation	Comment Received	Reference Look-Up
Natural England	Development of the Liskeard Neighbourhood plan is welcomed. We have a number of specific comments. These are set out below. <u>Site Allocations.</u> A number of site allocations & 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.	A1[1]
	<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.	A1[2]
	<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 & 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>	A1[3]
	<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	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	No Response	
Home and Communities Agency	No Response	
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> <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</p>	<p>A2[1]</p> <p>A2[2]</p>



Statutory Organisation	Comment Received	Reference Look-Up
	<p>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	<p>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 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</p>	<b>A3</b>

Statutory Organisation	Comment Received	Reference Look-Up
	development properly consider all such issues.	
Network Rail	No Response	
Highways Agency	No Response	
Marine Management Organisation	No Response	
Three (Mobile)	No Response	
O2 and Vodafone (Mobile)	No Response	
EE Mobile	No Response	
OFCOM	No Response	
Royal Cornwall Hospital Trust	No Response	
Peninsula Community Health	No Response	
Kernow Clinical Commissioning Group	No Response	
Healthwatch Cornwall	No Response	
National Grid	No Response	
Western Power Distribution	No Response	
EDF Energy	No Response	
Wales and West Utilities	No Response	
British Gas	No Response	
South West Water	No Response	
St Cleer Parish Council	No Response	
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.	<b>A4</b>
St Keyne Parish Council	No Response	
Dobwall Parish Council	Members of Dobwalls and Trewidland Parish Council attended the presentation of the Liskeard Neighbourhood Development Plan and would like you to accept this letter of support for the Plan.	



## Appendix B.

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

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

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>	<b>B1</b>
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 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.</p>	<b>B0</b>
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</p>	<b>B2[1]</b>

Local Organisation	Comment Received	Reference Look-Up
	<p>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>	<b>B2[2]</b>
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	No Response	
Roger Holmes CC Councillor Liskeard North Ward	No Response	
Sally Hawken CC Councillor Liskeard East Ward	No Response	
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> 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</p>	<p><b>B5[1]</b></p> <p><b>B5[2]</b></p>

Local Organisation	Comment Received	Reference Look-Up
	<p>preserve its identity and would view development close to the boundary between the two parishes as a threat to this. 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>  Agree that new employment opportunities are vital to support the development of housing. 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. Reason Good quality employment is essential to the economic future of both Liskeard and its hinterland.</p> <p><b>A Place to Live</b>  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. This may be attained under H8 which is a comprehensive expression of need. 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. 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>  As someone who visits Liskeard for these purposes I have to say there are many issues. 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</p>	<p></p> <p><b>B5[3]</b></p> <p><b>B5[4]</b></p> <p><b>B5[5]</b></p> <p><b>B5[2]</b></p> <p><b>B5[6]</b></p>

Local Organisation	Comment Received	Reference Look-Up
	<p>inviting independent outlets which service their niche markets but it would be great to have a wider offer with more known brands. 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. 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. 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>	B5[7]
	<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>	B5[8]
		B5[9]
Phil Seeva CC Councillor Menheniot Ward	No Response	
Sheryll Murray, SE Cornwall MP	No Response	

Local Organisation	Comment Received	Reference Look-Up
Chamber of Commerce	No Response	
Trader's Association	No Response	

Local Organisation	Comment Received	Reference Look-Up
Caradon Hill Area Heritage Project	No Response	
Fire & Rescue	See Cornwall feedback	B6
Lions Club	No Response	
Round Table	No Response	
Rotary Club	No Response	
NFU	No Response	
Stuart House	No Response	
Liskerrett Centre	No Response	
Old Cornwall Society	No Response	
Lux Park Leisure Centre	No Response	
U3A	No Response	
Walkers are Welcome	No Response	
World Heritage Site	No Response	
Cycling Group	No Response	
Business Enterprise Centre	No Response	
D&C Rail Partnership	No Response	
SE Corn Chamber of Commerce	No Response	
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	B7
Lantoom Quarry	No Response	
SE Corn Tourist Ass	No Response	
Caradon Monthly Walkers	No Response	
Corn Cycle Touring Club	No Response	
Sustrans	No Response	
Real Ideas Organisation	No Response	
Wesley Mother & Toddler Group	No Response	
Intercom Trust	No Response	

Local Organisation	Comment Received	Reference Look-Up
Gay Cornwall	No Response	
Liskeard Community College	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.	B8[1]
	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.	B8[2]
	They were interested in providing houses for first time buyers and also providing or refurbishing buildings for older people like Lamellion.	B8[3]
	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.	B8[4]
	The pop up shops had been popular, could this idea be reinstated.	B8[5]
St Martins School	No Response	
Hillfort School	No Response	
St Martins Church	No Response	
Methodist Church	No Response	
Catholic Church	No Response	
Quakers	No Response	
Grace Church	No Response	
Ark Mission	No Response	
Greenbank Christian Centre	No Response	
Greenbank Church	No Response	
Trader's Association	No Response	
Liskeard Town Forum	No Response	
Caradon Hill Area Heritage Project	No Response	
Rosedean Surgery	No Response	

Local Organisation	Comment Received	Reference Look-Up
Oak Tree surgery	No Response	
Eventide Residential Home	No Response	
Passmore Edwards Court	No Response	
ECHO Centre	No Response	
Greenbank	No Response	
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 received 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.
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, I like idea to keeping Roundbury and the large heritage area north of the town. Please ensure we keep to the development boundary at least to 2030.	yes	C3[1] C3[2] C3[3]
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. 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.	yes	C4[1]  C4[2]
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.  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 –  you say it could get quiet lane status - think this should be a definite to protect and enhance it for future generations.	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 Wetherspools 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</p>	yes	<p>C7[1] C7[2] C7[3] C7[4] C7[5] C7[6] C7[7] C7[8] C7[9] C7[10]</p>

Comment Received	LNDP Meets expectations	Reference Look-Up
<p>am not sure that Liskeard could support another supermarket - OR THAT A RETAILER WOULD WANT TO BUILD ONE - even 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>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</p>	yes	C8[1] C8[2]
<p>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?</p>	yes	C9
<p>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</p>	Yes	C10[1], C10[2] C10[3], C10[4], C10[5], C10[6],

Comment Received	LNDP Meets expectations	Reference Look-Up
I think that the plan is very thorough and I'm impressed by the scope of the plan. 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 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.	yes	C11[1] C11[2] C11[3]
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

Comment Received	LNDP Meets expectations	Reference Look-Up
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
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 comprehensve 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		C41

Comment Received	LNDP Meets expectations	Reference Look-Up
decisions taken elsewhere. Thank you.		
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
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

Comment Received	LNDP Meets expectations	Reference Look-Up
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
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

Comment Received	LNDP Meets expectations	Reference Look-Up
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]
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 vehicle?		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		C97[1],

Comment Received	LNDP Meets expectations	Reference Look-Up
town - not a multi-plex. More evening locations, restaurants/bars.		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
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 Pre-submission consultation (Regulation 14) Comments by Developers and Land Owners and Reference Look-Up

The table below sets out the comments received from developers and land-owners during the Pre-Submission consultation.

Comment Received	Reference Look-Up
<p><b><u>Persimmon Homes</u></b>  <b>Policy NP1 The Neighbourhood Plan Boundary and its extension.</b>  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).  <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</p>	<p><b>D1[1]</b></p> <p><b>D1[2]</b></p> <p><b>D1[3]</b></p>

Comment Received	Reference Look-Up
<p>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> <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</p>	<p>D1[4]</p> <p>D1[5]</p> <p>D1[6]</p> <p>D1[7]</p>

Comment Received	Reference Look-Up
<p>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></p> <p>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>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>D1[8]</b></p> <p><b>D1[9]</b></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</p>	<p><b>D2[1]</b></p>

Comment Received	Reference Look-Up
<p>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> <ul 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> </ul> <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> <ul 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> </ul> <p>3. National Planning Policy and Guidance National Planning Policy Framework (NPPF)</p>	<p><b>D2[2]</b></p>

Comment Received	Reference Look-Up
<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>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</li> </ul>	

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<p>market for land;</p> <ul style="list-style-type: none"> <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> <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>	

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<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: "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</p>	

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<p>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> <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</p>	



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<p>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 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</p>	

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<p>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> <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>	

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<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> <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</p>	

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<p>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> <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>	

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<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> <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>D2[3]</p>



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<p>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>EM2B – East of Charter Way</p> <p>5.14 Policy EM2B proposes an allocation of some 11.05ha east of Charter Way for employment use.</p> <p>5.15 We support the principle of an employment allocation of this scale, which is necessary to meet the residual targets for employment land identified within the Local Plan (i.e. 19,732m<sup>2</sup> of office space and 15,292m<sup>2</sup> of industrial space). However, we have concerns as to whether there is a reasonable prospect of the site coming forward during the plan period. Paragraph 22 of the Framework states: "Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose."</p> <p>5.16 The site was allocated for employment use in the Caradon Local Plan (Policy ALT9) in 2007, but has not come forward in the following 10 years. Table 1 of the LNP Work &amp; Learn Report states: "The site has not come forward due to various factors including the existence of a ransom strip across the only feasible access route and a lack of enabling funding."</p> <p>5.17 It is therefore apparent that there are significant and fundamental constraints to bringing the site forward, and it is not clear how these could be overcome. We are not convinced that the inclusion of a 'small element of housing' as proposed by the policy will be sufficient to overcome the prevailing issues on this site.</p>	D2[6]

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<p>5.18 The fact that the site has not come forward has resulted in the Caradan Local Plan failing to meet identified development needs. The evidence base had specifically identified the site to meet a significant need for employment land in Liskeard . The effects of the failure are also reflected in the justification text for draft policy EM1 in the LNP, which raises concerns over the imbalance between housing and jobs growth.</p> <p>5.19 We consider that alternative allocations should be considered to deliver the necessary quantum of employment land. Specifically our client proposes an allocation on land at Coldstyle Road, which could deliver approximately 5ha employment land as part of a mixed use development. This is addressed further under Section 6, and a site location plan is appended at EP2.</p> <p>Policy EM3 - Allocation of employment land outside but abutting the LNP designated area</p> <p>5.20 We have set out above our concerns in relation to allocating employment land whereby there is limited prospect of development coming forward. It is not clear from the evidence base as to whether there is agreement with Menheniot Parish Council over the prospective allocation of the site, and furthermore whether the site is being actively promoted / deliverable.</p> <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</p>	<p><b>D2[7]</b></p> <p><b>D2[8]</b></p> <p><b>D2[9]</b></p>



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<p>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>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>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</p>	<p><b>D2[10]</b></p> <p><b>D2[11]</b></p> <p><b>D2[12]</b></p>

Comment Received	Reference Look-Up
<p>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 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</p>	<p><b>D2[13]</b></p>

Comment Received	Reference Look-Up
<p>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>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 200m2 is too low. The national standard set out in the Framework is 2,500m2. 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,</p>	<p><b>D2[14]</b></p> <p><b>D2[15]</b></p> <p><b>D2[16]</b></p> <p><b>D2[17]</b></p>

Comment Received	Reference Look-Up
<p>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>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><b>D2[18]</b></p> <p><b>D2[19]</b></p>

Comment Received	Reference Look-Up
<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> <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><b>D2[20]</b></p>

Comment Received	Reference Look-Up
<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 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</p>	<p><b>D2[21]</b></p>

Comment Received	Reference Look-Up
<p>(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> <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>	

Comment Received	Reference Look-Up
<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>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</p>	<p><b>D3[1]</b></p> <p><b>D3[2]</b></p>



Comment Received	Reference Look-Up
<p>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[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></p> <p>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>
<p>Wilton Homes – Non received</p>	
<p>Linden Homes South West – Non Received</p>	
<p>Ivan Tomlin – Non Received</p>	
<p>Pearce Fine Homes – None received</p>	

Comment Received	Reference Look-Up
AHT Design – None received	
David Pierce – None received	

## Appendix E Appendix D Pre-submission consultation (Regulation 14) Comments by Cornwall Council Officers and Reference Look-Up

The table below sets out the comments received from officers representing Cornwall Council during the Pre-Submission consultation.

Comment Received	Reference Look-Up
<p><u>Strategic framework</u></p> <p>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.</p>	E1[1], E1[2]
<p><u>Repetition of strategic policy</u></p> <p>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></p> <p>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></p> <p>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></p> <p>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

Comment Received	Reference Look-Up
<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> <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>	E7
<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>	E5

Comment Received	Reference Look-Up
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.	
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.	E6
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.	E7
EM3: This cannot be a policy. Could be referred to in supporting text, but cannot have a policy which operates outside the NDP area.	E11
EM4: Part of Moorswater estate is also outside the NDP area.	E12
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.	E13
EM6: where policies refer to a site this should be shown on a clear map (eg Liskeard School)	E14
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.	E15
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.	E16[1] E16[2]
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	E17

Comment Received	Reference Look-Up
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>
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 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	<b>E27[1],</b>

Comment Received	Reference Look-Up
delete these elements, so that more emphasis is given to the specific local requirements.	<b>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.	
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>
OSL3 and 5: see comments from Open Spaces team	<b>E37[1]</b>

Comment Received	Reference Look-Up
<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 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.</p>	E37[2]
<p>P65 – Reference is made to Appendix E – list of excluded open space. Where is this?</p>	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</p>	E38



Comment Received	Reference Look-Up
<p>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:*) 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	<b>E40</b>

Comment Received	Reference Look-Up
create significant issues	
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>
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) P72 – Comment – para1 – this does not accord with government rules imposed on s106, whereby only developments in urban areas of 11 & more can be required to make off-site contributions. It is my understanding that substituting this to a planning condition would not be permissible.	<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>
OSL11: not clear on map – not all listed – see also OSL8	<b>E46</b>
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.	<b>E47</b>
SUS2; This isn't a policy – and cannot be required by policy. Move to supporting text.	<b>E48</b>
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.	<b>E49</b>

Comment Received	Reference Look-Up
<p>General comments:</p> <p>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. 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>	