

Landrake with St Erney Neighbourhood Development Plan

2017 – 2030

Consultation Statement
FINAL VERSION August 2018

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1 Introduction

This Consultation Statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012 (set out in 1.1 below) relating to the Landrake with St Erney Neighbourhood Development Plan (LNDP).

1.1 Legislative Requirements

Section 15(2) of Part 5 of the 2012 Neighbourhood Planning Regulations (<http://www.legislation.gov.uk/uksi/2012/637/made>) sets out what a consultation statement means; in that it is a document which -

- (a) contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
- (b) explains how they were consulted;
- (c) summarises the main issues and concerns raised by the persons consulted; and
- (d) describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.

Consultation and community engagement has been fundamental to the development of the LNDP and has gone far beyond the requirements of the regulations.

2 Background

The rural Parish of Landrake with St Erney is situated in South East Cornwall between Saltash and Liskeard.

The parish population at the 2011 census was 1115 (447 households with at least one usual resident) There in one main settlement; the village of Landrake. The parish covers almost 3600 acres of mainly agricultural land and woodland, with small farmsteads.

2.1 Reason for Undertaking a Neighbourhood Development Plan (NDP)

Following the introduction of the Localism Act 2011, and thus the introduction of Neighbourhood Planning into the hierarchy of special planning, the Parish Council took steps to find out more.

The Parish Council felt that this was an opportunity to shape land use and development in the parish, giving local people the opportunity to be more active and involved in the planning system, as well as more generally participating and connected to issues they feel passionately about.

The Parish Council experience of the planning system sometimes left councillors and local people feeling powerless – the perception being that their local knowledge and views did not hold any significant weight. Whilst realising that a Neighbourhood Plan must be in general conformity with county and national planning documents, this would be a chance to have some influence over the future development of the parish, as part of the planning process. Recent planning applications have resulted in unprecedented attendance at public meetings and a real sense of concern about inappropriate development in the village has driven support for a neighbourhood plan.

Being within the curtailment of the Cornwall AONB, protecting the landscape and village setting has been a priority concern for the community, alongside traffic and parking issues which impact day to day life and has the potential to be exacerbated by ill thought out development.

2.2 Formation of the Neighbourhood Planning Steering Group

At a Parish Council meeting on 18th February 2014 the Landrake with St Erney Parish councillors resolved to set up a neighbourhood plan group with representation from the Parish Council, the Landrake Neighbourhood Association and the local community.

The Steering Group consisted of local parishioners representing different interests (both business, domestic and landowners / developers) and Parish Councillors and met regularly throughout the development of the plan. The Steering Group's function was to provide a balanced community perspective as the plan moved forward, review evidence and make collective decisions about policy direction. The Steering Group has championed community views and provided the community perspective to negotiate with Cornwall Council as to how the LNDP can align with the Cornwall Local Plan whilst also delivering what the residents of the parish want to see.

2.3 Designation of the Neighbourhood Plan Area

Landrake with St Erney Parish Council submitted an application and map for designation of their Neighbourhood Area on 28th April 2014. Cornwall Council consulted residents and other interested stakeholders on the designation between 9th May and 20th June 2014. Copies of the application letter and the statement that explains how the Parish Council and Neighbourhood Area met with the conditions of Section 61G(2) of the Town And Country Planning Act 1990, were made available to view from Saltash Library and One Stop Shop during the six week consultation period.

Copies of the documents are available to download or view here:

<https://www.cornwall.gov.uk/environment-and-planning/planning/neighbourhood-planning/neighbourhood-planning-in-cornwall/tab-placeholder/j-m/landrake-with-st-erney-neighbourhood-development-plan/>

The designation of the Neighbourhood Plan area was confirmed under application number PA14/00008/NDP on 11th July 2014.

3 The Vision

There is a realisation that places and people's needs change over time and that the Parish Council, community, businesses and stakeholders can plan for this taking into account social, environmental and economic needs. Landrake with St Erney Parish is a rural parish with distinct character both in landscape and the heritage of the built environment.

The Vision is: In 2030 Landrake with St Erney will continue to be a beautiful rural parish, proud of its special landscape, natural environment and quiet, historic village setting. The community will be content that they have the levels of housing, employment and infrastructure that they require.

4 Objectives

Below is a list of the objectives identified throughout the consultation and engagement process. The outline objectives were displayed at events and were consulted upon, in order to seek further comment and refinement.

These objectives formed the basis for the policies in the Landrake with St Erney NDP.

Objective 1

To retain and enhance the valued natural environment, habitat and landscape of the Parish.

Objective 2

To retain the valued quiet village setting and local heritage features.

Objective 3

To accommodate growth in order to meet the identified needs of those who live and work in the community.

Objective 4

To ensure that community facilities and infrastructure are retained, enhanced, or improved to meet the identified needs of the Parish especially parking provision.

The objectives are expressed in the policies of the neighbourhood plan.

5 Overview of the Consultation Process

Quality community consultation and ensuring that community needs and wants are integral to the objectives and subsequent policies of the NDP, is of key importance to both the Neighbourhood Plan Group and the Parish Council as the Accountable Body – this is the driving purpose of undertaking a neighbourhood plan.

Extensive community and stakeholder engagement has been undertaken as we have progressed through the different stages of the plan development. We have endeavoured to consult and engage through a range of techniques with the intention that everyone who wishes to get involved is able to and this has included letter box drops for every household in the parish with surveys and information, public events and meetings and consultations stakeholders like local land owners.

5.1 Key Milestones

2014

- Feb 14
 - Public Meeting to discuss Neighbourhood Plan Potential
- Apr 14
 - Presentation at Parish Council AGM
 - Decision taken to proceed with the Landrake with St Erney Neighbourhood Plan.
 - Steering Group established
- Jun 14
 - Initial scoping and community consultation launched
 - Presentation at St Erney Fair
- Aug 14
 - On-going consultation & publicity of plan
 - Evidence gathering
- Oct 14
 - Public drop in events / consultation to agree emerging themes from consultation to date
 - Initial survey delivered to each resident
 - Emerging Themes published on Parish website and available in shop and school
- Nov 14
 - Themes presented for consultation at Christmas Fair

2015

- Jan 15
 - Door to door leaflet and invite drop
 - Public consultation event

- Mar 15
 - Survey delivered to every household
 - Policy drafting for NDP & continued evidence gathering
 - Presentation at St Erney Fair
- Oct 15
 - Steering Group review of draft policies
 - Evidence gaps assessed

2016

- Jan-Mar 16
 - On-going evidence gathering and consultation
- Apr-Dec 16
 - Stakeholder consultations
 - Detailed negotiations with CC on draft policies in light of Cornwall Local Plan changes.
 - Policy revision
 - Submitted to CC for screening opinion

2017 onwards

- Jan – Mar 17
 - CC advice/guidance on housing numbers
- Apr-Sep 17
 - Landscape Capacity Assessment commissioned
 - Design guide produced
 - Policy drafting
 - Public Consultation Event
- Nov 17
 - Screening opinion update sought from CC
 - Pre-submission consultation started.
- Dec 17 – Feb 18
 - Further negotiations with Cornwall Council on draft policies
 - Pre-submission consultation completed

6 The Consultation Stages

6.1 Preliminary Engagement and Consultation - 2014

Following consideration and resolution to embark on a Neighbourhood Plan, the Steering Group arranged a presentation at the Parish Council AGM in April 2014 in order to engage with the community and confirm public support. It involved:

- Raising awareness of the process, what this would entail and what it could achieve;
- Explaining what impact this might have; and
- Attracting volunteers and interest.

Following this an initial consultation event was held at St Erney Fair in June 2014 where the Neighbourhood Plan was promoted and comments were invited from the community.

6.2 Awareness Raising

The Parish Council website has been used as the online vehicle to promote the NDP and provide full copies of evidence, emerging themes coming from consultation activities; the emerging NDP versions as the document has progressed; as well as carrying information about events and how to feed in to the process.

In addition to the website regular updates on progress, events and how to participate were submitted to the Parish newsletter; Crosstalk. This provided the regular communication and supplemented direct engagement via household leaflet; the survey drop and public events. At a later stage in the process, the draft NDP was, in addition, available to view at the village shop.

6.3 Further Community Consultation Events and Surveys

In the summer of 2014, the Steering Group reviewed evidence & comments from the public meetings, statutory documents behind the Cornwall Local Plan and the Landrake with St Erney Parish Plan 2005 to develop an in depth household questionnaire. Although primarily focused on the NDP in terms of aspects for land use and development the survey also took the opportunity to seek community guidance on wider issues that could be addressed through projects after the NDP was in place.

Surveys were distributed by volunteers to every household in the Parish in September 2014 and 185 were returned.

The results from the surveys together with consultation feedback and information from other sources including Cornwall Wildlife Trust, were used to compile an emerging themes document. In November 2014 the Neighbourhood plan group presented this emerging themes paper for consultation at the Christmas fair (as well as this being made available online). It was actively promoted by members of the Steering Group, advertised on a flier posted to all households and copies were available, with feedback forms, in the village shop. There was also an information point at the Christmas Fair – allowing residents to

come and discuss the document and give their views and thoughts. There were no objections to the content of the Emerging Themes document. The document included the following information:

Housing

- *Affordable housing is needed for local people.*
- *Housing development must be limited to preserve the character of the village as it is.*
- *Build smaller and single-storey affordable properties to allow people to scale down but stay in the Parish.*
- *New housing should be provided that is in direct response to the broad range of needs identified in the area.*
- *Of 98 responses to the initial survey, 41 favoured development to the north; compared to 11 for the south; the remaining 46 did not indicate a preference.*

Economy

- *The local farming community is highly valued in the village and there is support for increasing employment in this area.*
- *There is no desire for a large increase in employment or additional businesses in the parish.*
- *There is support for employment in health, community and education.*

Community

- *Traffic from and around the school is an issue.*
- *Better footpath access around the village and to amenity areas is required.*
- *Village setting and its quiet natural environment are valued*

Transport

- *Parking and Access is an issue.*
- *Dangerous access onto A38.*
- *Speed of traffic is an issue.*
- *The lack of on-street parking is a problem in Landrake.*

Others

- *Wish for village to stay the same.*
- *Some concern over the future e.g. merging with Saltash.*
- *PO and shop valued.*
- *Infrastructure issues – sewerage, water pressure and broadband.*

A specific neighbourhood plan consultation event was held in January 2015 and approximately 50 residents attended. Following this, a second short survey relating to housing need was developed. This survey was delivered to all households and advertised in the parish magazine. 68 surveys were returned.

A follow up event took place in March 2016 and a flyer was sent to all households to come along. At this event, the draft NDP was exhibited in poster form. 61 people attended and the feedback was positive and supportive, and fed into the NDP development process. The only significant negative comment related to omission of the community's wish to see future development on the north side of the A38 (which had been part of the emerging themes document).

6.4 Specific Youth Consultation

Information and opinions from young people in the area were obtained by Steering Group members from the Young Farmers group, and informal discussion with other young people. There were two main issues – concern that none of them envisaged being able to live in the village in 10 years because they would not be able to afford it; and criticism of the local pub (since which time it has changed management).

6.5 Stakeholder Consultation

As part of the consultation, approaches were made to both South West Water and Highways Agency to comment on any issues associated with development in and around the parish. This was triggered by previous planning applications and pertained to sewage and transport issues.

As part of the pre-submission consultation, 56 identified stakeholders were contacted directly with the Pre-submission consultation Draft Nov 17 version of the Neighbourhood Plan.

For full list of websites and papers used see Evidence Report.

6.6 Consultation with Neighbouring Parishes

The Clerks of the six neighbouring parishes were first contacted to let them know that Landrake with St Erney Parish had been the process of developing a NDP. Subsequently, these clerks were contacted again in November 2017 as part of the formal consultation process, where they were asked to voice their opinions on the Neighbourhood Development Plan. St Germans were the only parish to respond, showing their support for the plan.

7 Summary of consultation results by Theme

Housing:

- Most support for small (1-2 bedrooms) and medium size houses (3 to 4 bedrooms)
- Affordable housing seen as one of the most significant housing type needs.
- Small scale development would be the preferred option.
- Housing needs survey indicated that 6 respondents felt that someone in their house would like separate accommodation and 8 stated their current accommodation is not suitable.

Environment:

- The village setting, quiet environment and historical character and heritage assets were all seen as being important; and in particular the attractive views and vistas.
- The children's play area; rural spaces and walking routes were all valued. Allotment space (or lack of it) seen as a something that could be improved.

Employment:

- In terms of encouraging employment, the most popular option was to encourage employment in rural enterprises such as farming; with the next most popular being jobs in health, community and education sectors.
- The need to improve parking and reduce traffic congestion in order to improve the 'village centre' was highlighted.
- Some residents would like to encourage more shops and improve the way the village looks and feels. Parking and Access was seen as the biggest barrier to growth and sustainability of local businesses; as well as the main problem that resulted from businesses in the parish.

Education:

- Again traffic to/from the school was seen as a main issue. There was little emphasis on specific worries concerned the education provision.

Community:

- The Community Hall flagged as being an important building. Youth services, adult leisure activity and the day centre seen as being the most in need of improvement.
- Community facilities are valued.

Traffic and Transport:

- Tackling parking problems and encouraging use of public transport; followed by the need to lessen congestion were seen as the main priorities for 'getting around'.

8 Policy Areas Taken Forward

Housing	Policy 1: Target Housing Growth for the Plan Period Policy 2: Locations for New Housing Developments Policy 3: Size and Type of Housing
Economy	Policy 4: Economic Development
Transport	Policy 5: Minimum Parking Requirements Policy 6: Improving Congestion and Highway Safety
Design	Policy 7: Design of New Development
Community	Policy 8: Safeguarding existing Community Facilities Policy 9: Safeguarding Recreational Area and Important Green Spaces
Landscape	Policy 10: Safeguarding the Landscape
Heritage	Policy 11: Safeguarding Heritage
Wildlife	Policy 12: Safeguarding Wildlife

9 Formal Consultation Stage - Consultees

Organisation	Name (if known)	Contacted at:
Cornwall Council as per Schedule 1 Regulation 3 Consultation Bodies for Neighbouring Planning – (a)		
Cornwall Council Neighbourhood Planning Team		neighbourhoodplanning@cornwall.gov.uk
Parish Councils as per Schedule 1 Regulation 3 Consultation Bodies for Neighbouring Planning – (b)		
Sheviock	Clerk: Nancy Grey	sheviockpc@btinternet.com
St Germans	Clerk: Emily Young	stgermansparish@gmail.com
Quethiock	Clerk: Vanessa Pinhey	quethiockparishcouncil@hotmail.co.uk
Pillaton	Clerk; Richard Woodley	richardwoodley008@gmail.com
Saltash TC	Clerk: Raymond Lane	enquiries@saltash.gov.uk
Botus Flemming	Clerk: John hesketh	clerk@botusfleming.org.uk
Government Bodies and Other National Agencies as per Schedule 1 Regulation 3 Consultation Bodies for Neighbouring Planning – (d-j)		
Homes and Communities Agency		mail@homesandcommunities.co.uk
Natural England	Consultation Service	consultations@naturalengland.org.uk
Environment Agency		cornwall.planning@environment-agency.gov.uk
Historic England (formerly) English Heritage		e-swest@HistoricEngland.org.uk

Organisation	Name (if known)	Contacted at:
Network Rail		townplanningwestern@networkrail.co.uk
Highways England (formerly Highways Agency)		ian.parsons@highways.gsi.gov.uk
Highways England – Managing Agent Contractor		Area1NCC@kier.co.uk
Marine Management Organisation		plymouth@marinemanagement.org.uk
Electronic Communications as per Schedule 1 Regulation 3 Consultation Bodies for Neighbouring Planning – (k)		
BT Openreach		networkalts.southwest@openreach.co.uk
Three Mobile		jane.evans@three.co.uk
O2 and Vodafone Mobile		EMF.enquiries@ctil.co.uk
EE mobile		public.affairs@ee.co.uk
Ofcom		Spectrum.Licensing@ofcom.org.uk
Health and Utilities as per Schedule 1 Regulation 3 Consultation Bodies for Neighbouring Planning – (l)		
Royal Cornwall Hospital Trust	Garth Davies	garth.davies@nhs.net
Peninsula Community Health		pch.communications@pch-cic.nhs.uk
Kernow Clinical Commissioning Group	Janet Popham	janet.popham@nhs.net
Healthwatch Cornwall	Lyn Davey	enquiries@healthwatchcornwall.co.uk ldavey@cornwall.gov.uk

Organisation	Name (if known)	Contacted at:
National Grid DPM Consultant Amec Foster Wheeler E&I UK		n.grid@amecfw.com
National Grid		box.landandacquisitions@nationalgrid.com
EDF Energy		Freepost RRYZ-BGYG-JCXR, EDF Energy, 334 Outland Road, Plymouth, PL3 5TU
Western Power Distribution		wpdconnectionspolicy@westernpower.co.uk
Wales and West Utilities Limited		enquiries@wwutilities.co.uk
South West Water		devplan@southwestwater.co.uk
British Gas		Po Box4805 Worthing BN11 9QW
Others inc. per Schedule 1 Regulation 3 Consultation Bodies for Neighbouring Planning – (m to q)		
National Trust	Michael Calder	michael.calder@nationaltrust.org.uk
Campaign to Protect Rural England (CPRE)	Anita Grice-Goldsmith	anita@cprecornwall.org
Cornwall Wildlife Trust	Cheryl Marriott	cheryl.marriott@cornwallwildlifetrust.org.uk
National Farmers Union (SW)		Southwest.nfu.org.uk
Cornwall Area of Outstanding Natural Beauty (AONB)	Colette Beckham (Partnership Manager)	info@cornwall-aonb.gov.uk cbeckham@cornwall.gov.uk

Organisation	Name (if known)	Contacted at:
Devon And Cornwall Housing Association		info@dchgroup.com
Ocean Housing Cornwall		development@oceanhousing.com
Coastline Housing	Matt Ward	matt.ward@coastlinehousing.co.uk
Westcountry Housing Association		info@westcountryha.org.uk
Cornwall Chamber of Commerce & Industry		norma@cornwallchamber.co.uk
Cornwall Federation of Small Businesses	Ann Vandermeulen	Ann.Vandermeulen@fsb.org.uk
Plymouth Citybus		customer.services@plymouthbus.co.uk
First Kernow	Alex Carter (Managing Director – Cornwall)	alex.carter@firstgroup.com
First Great Western	Dan Okey – Regional Manager	dan.okey@gwr.com
Landrake School		secretary@sir-robert-gefferys.cornwall.sch.uk
Cornwall & IoS Local Enterprise Partnership		info@cioslep.com
Community Energy Plus		
Cornwall Buildings Preservation Trust		
Devon and Cornwall Police	Martin Mumford	martin.mumford@devonandcornwall.pnn.police.uk

Organisation	Name (if known)	Contacted at:
Cornwall Fire & Rescue Service		csadmin@fire.cornwall.gov.uk
Cornwall Sports Partnership	Ms Charlie Crane	ccrane@cspnetwork.org
Cornwall Rural Community Council	Peter Jefferson	peter.jefferson@cornwallrcc.org.uk
Cornwall Youth Work Partnership		contact@cywp.org.uk
Civil Aviation Authority		aerodromes@caa.co.uk windfarms@caa.co.uk
Cornwall Federation of Women's Institute	Frances Armstrong	cfwi@btconnect.com

10 Formal Consultation - Consultee Responses and Action Taken

Organisation	Response	Action Taken
Cornwall Councillor Saltash East	<p>– Firstly I think it will be really good for the village if you make reference to the A38 and the problems with egress from the village, the way in which the road splits the village and pollution from vehicles. I think it may be a good idea if you showed these aspirations within your plan.</p> <p>Secondly it has struck me in the past and I was reminded about it recently that there is a shortage of off-road footpaths and certainly circular walks from the village. Again I think it would be good for you if you showed that in the future you would be looking to create footpaths where possible and you could even identify areas that would benefit.</p>	<p>Noted, first point is outlined in the NDP, on the second, policy seeks to safeguard and encourage recreational activity in the parish.</p> <p>No action required.</p>
National Grid	<p>An assessment has been carried out with respect to National Grid’s electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines and also National Grid Gas Distribution’s Intermediate / High Pressure apparatus.</p> <p>National Grid has identified the following high voltage overhead powerlines as falling within the Neighbourhood area boundary: YE Route – 400kV from Landulph substation in Cornwall to Indian Queens substation in Cornwall From the consultation information provided, the above overheads powerline does not interact with any of the proposed development sites.</p> <p>Gas Distribution – Low / Medium Pressure Whilst there is no implications for National Grid Gas Distribution’s Intermediate / High Pressure apparatus, there may however be Low Pressure (LP) / Medium Pressure (MP) Gas Distribution pipes present within proposed development sites. If further information is required in relation to the Gas Distribution network please contact plantprotection@nationalgrid.com</p>	<p>Points noted no action required.</p>

<p>Highways England (response from earlier consultation, included due to extent and scope of feedback - received June 2017)</p>	<p>In general terms, the majority of the village settlement including shop, school, church, post office, public house etc is located to the south of the A38. As a result the road junction in the centre of the village is very busy during peak periods and the start and end of the school day. A footbridge over the A38 links the smaller housing settlement with the facilities available in the centre of the village, and in general the road junctions to the north of the A38 are quieter and do not suffer from queuing on the local road network. Footways within the village are limited by the width of available space between many of the rows of traditional dwellings, for this reason it would be difficult to build new footway links to the proposed development sites in Tideford Road and Pound Lane.</p> <p>Tideford Road site:</p> <ul style="list-style-type: none"> • there are no existing footways on Tideford Road linking the site to the centre of village. • the A38 Tideford Road junction has a traffic regulation order banning right turns from A38 eastbound carriageway. Our data shows no recorded collisions in the last 5 years. • the A38 junction in centre of village is very busy with delays on the local road network during peak times including the start and end of the school day. The junction collision also shows no recorded collisions in the last 5 years. <p>Pound Lane site:</p> <ul style="list-style-type: none"> • there are no existing footways on Pound Lane linking the site to A38 footways. • the centre of village, shops, school etc can be accessed via the A38 footbridge removing the need for pedestrians to cross the A38 at road level. • to the best of our knowledge, the Pound Lane junction does not suffer from congestion, and the junction collision record shows 1 slight collision within the last 5 years. <p>West Lane site:</p> <ul style="list-style-type: none"> • a footway linking to the A38 could be built along West Lane as part of the development. • the site must be accessed from West lane as no new access to the A38 will be permitted. • the centre of village, shops, school etc can be accessed via the A38 footbridge removing the need to cross the A38 at road level • again, to the best of our knowledge the West Lane junction does not suffer from congestion, and our junction collision shows 1 recorded slight collision within the last 5 years. 	<p>Comments are noted. The response indicates no in principle objections from Highways England to the NDP and identified extensions to the settlement boundary.</p> <p>No action required.</p>
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Historic England	I can confirm that there are no issues upon which we wish to comment other than to offer your community our congratulations on its progress to date and wish it well in the making of its Plan.	No action required
MMO	<p>I am writing to you in response to your pre-submission consultation draft Neighbourhood Development Plan for for Landrake with St Erney Parish Council; I am a Marine Officer within the Marine Management Organisation, a body that comes under DEFRA, and am replying writing to notify you of the MMO's role within the planning process as your parish plan includes the River Lynher – a tidal river.</p> <p>The MMO controls activities affecting tidal waters, including tidal rivers and their banks, and in some cases works which could potentially affect the marine habitat could potentially require a Marine Licence to be issued before they can be carried out.</p> <p>Marine Licences ensure any activities on the coast, at sea, or in tidal reaches are properly considered and licensed in order to provide a balance between protecting the environment whilst supporting the use of marine resources – should you require more clarification this can be found at the below link:</p> <p>https://www.gov.uk/topic/planning-development/marine-licences</p> <p>I appreciate any further information you can give me regarding this matter and hope this helps you formulate your parish plan and control activities</p>	No action required, the NDP has no specific policies impacting on the River Lynher.
St Germans Parish	The Landrake with St Erney Neighbourhood Plan Consultation document was circulated and discussed at our November 2017 Parish Council meeting, where the Councillors asked me to express their support to this plan.	Points noted, no action required.

<p>Police Designing Out Crime Officer - Devon and Cornwall Police</p>	<p>I could see no specific reference to crime or disorder/anti-social behaviour which i feel should be included within all such Neighbourhood Plans. Whilst these are covered within other national and council policies i feel they should also be in the NDP,</p> <p>I would therefore suggest that the following statement is included where appropriate within the NDP "All development proposals should consider the need to design out crime, disorder and anti-social behaviour to ensure ongoing community safety and cohesion"</p> <p>This can apply to all forms of development not just housing. May also be just as relevant for car parks, footpaths, play areas, commercial development etc. By designing out opportunities for crime and ASB will not only hopefully prevent or reduce these but very importantly also help reduce the fear of crime.</p> <p>Within the Supplementary Documents there are a couple of points I would raise.</p> <p>Firstly with regard to parking I would advise that if possible parking solutions should enable spaces to be well overlooked so benefit from natural surveillance ideally from the owner's property.</p> <p>I also have some reservations with regard to the example given of a modern garage on page 15. This appears to be a communal area of parking comprising open car ports rather than garages. Whilst I have no issues with the materials used, in terms of security this sort of design has sometimes caused issues elsewhere in the county. Most of these have revolved around groups using similar such car ports as "shelters" sometimes then with ensuing ASB/crime issues.</p> <p>I note also the comments regarding street lighting. I do not necessarily disagree entirely with the sentiment but there will be occasions where there must be appropriate street lighting for new developments. This may be for example shared parking courts or on street parking or certain pedestrian routes. If one of the principal ideas is to encourage residents to walk rather than using vehicles then feeling safe when dark should be considered.</p>	<p>Point added into the design policy 7.</p> <p>Note wider views, but not considered that these are fundamental to the NDP's acceptance in planning terms. The design guide however has been slightly amended to address points raised.</p>
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<p>Natural England</p>	<p>We recognise the hard work being done by your Parish in developing a Neighbourhood Plan and we welcome being consulted on this consultation draft. The parish supports a rich and diverse natural environment, reflected in the designation of the Lynher Estuary Site of Special Scientific Interest (SSSI), Plymouth Sound and Estuary Special Area of Conservation (SAC) and the Tamar Estuaries Complex Special Protection Area (SPA). A large part of the parish is also designated as the Tamar Valley Area of Outstanding Natural Beauty (AONB).</p> <p>Our comments on detailed policies are as follows: Policy 2: Locations for New Housing Development states: A settlement boundary for Landrake village is shown on the proposals map. New housing development within the parish of Landrake and St Erney will be provided through: 1. Infill within Landrake Village New housing development will be supported within the Settlement Boundary of Landrake Village shown on the proposals map We advise that as you have allocated land for development, based on the evidence of your 'Landscape Character Assessment of Potential Settlement Growth Options', a Strategic Environmental Assessment (SEA) of the potential environmental impacts of the proposed developments will be required. This SEA can be limited in scope to address the main potential impacts. We advise you to consult Cornwall Council regarding the requirement for an SEA, as the SEA of the Local Plan may already address the potential impacts of your allocation.</p> <p>Policy 10 Safeguarding the landscape states: Any developments affecting the setting of the AONB will be additionally required to demonstrate that they have responded appropriately to the policies and guiding principles contained within the Tamar Valley Area of Outstanding Natural Beauty Management Plan. We advise that you include 'the AONB and its setting' in this policy, as a large section of the parish is designated AONB and the policy should cover land both in and outside the AONB.</p>	<p>NDP has been amended to address points raised.</p> <p>Further dialogue has been undertaken with NE on the commentary on the SEA and the revised text makes clear that there is not the intention to allocate a site.</p>
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	<p>Policy 12 Safeguarding Wildlife Proposals for development which would significantly harm any of the nature conservation sites identified on Appendix 6 will not be supported. Any development that demonstrates any significant harm will be required to demonstrate appropriate mitigation that results in an overall environmental enhancement within the Parish. Any proposals which would be likely to adversely affect the SSSI will not be permitted unless the benefits of the development, at this site, clearly outweigh both the adverse impacts on the site and any adverse impacts on the wider network of SSSI's.</p> <p>Designated conservation sites are afforded stringent protection from the impacts of development through legislation, such as the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017 and through the NPPF. Cornwall Local Plan affords such sites protection through its policies, the wording of which has been agreed with Natural England.</p> <p>We advise that as such protection is in place, and to avoid any confusion, you should remove policy 12 and instead rely on the wording of the Local Plan and the NPPF.</p> <p>General: Green Infrastructure The importance of green space is highlighted in the plan and is welcomed. Cornwall Green Infrastructure Strategy could usefully be referenced in your plan. Green Infrastructure can perform a range of functions including improved flood risk management, provision of accessible green space, climate change adaptation and biodiversity enhancement. Additional evidence and case studies on green infrastructure, including the economic benefits of GI can be found on the Natural England Green Infrastructure web pages.</p>	
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<p>Natural England continued</p>	<p><i>Just one point I would welcome the opportunity to clarify is that of the requirement for an SEA. I would like to confirm that whilst the NDP has enlarged the settlement to allow for growth, following a stipulation of Cornwall Council (due to the housing delivery shortfall in the Community Network Area), land has not been allocated for development. The Parish would rather not extend the settlement boundary, but Cornwall Council have insisted we do this, the plan has been delayed for over 12 months due to ongoing discussions on this matter. We have received an SEA screening opinion from Cornwall Council and this has confirmed that an SEA is not required.</i></p> <p><i>Please could I ask you to review this and if in agreement with the Local Authority conclusions, revise comments accordingly?</i></p> <p>“If the land set aside for housing in the Landrake NDP is not an allocation, an SEA will not be required. Maybe you could add some wording to the plan to clearly state it is not an allocation, because a red line boundary on a map, supported by a landscape appraisal, looks like an allocation.”</p>	
<p>Cornwall Council – Economic Development</p>	<p>Policy 4 - Support for rural enterprises such as farming is consistent with economic strategy but co-location of functions may be needed to enable supply chain development opportunities to help support existing businesses in the area.</p> <p>Policy 5 - While understood, the parking space requirement could compromise garden provision when considering developer’s margins</p> <p>Policy 7 - Design should also include space for drying clothes (to avoid mould) and to keeping recycling equipment</p> <p>Policy 9 - The policy does not appear to provide for an environmental assessment when saying that there is the possibility of replacement for community facilities.</p>	<p>Acknowledge comments but considered these are matters of detail that do not necessarily go to the heart of the purpose of the policies listed. ie the policy functions acceptably without these additions. Therefore no change is recommended.</p>

<p>Cornwall Council – Environment – Public Open Space</p>	<p>Thank you for consulting Public Space.</p> <p>The National Planning Policy Framework 2012 (para 73) requires that planning policies should be based on robust & up to date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. In July 2014 Cornwall Council adopted the Open Space Strategy for Larger Towns in Cornwall as interim planning guidance, following the adoption of the Local Plan, it will be taken forward as the evidence base for a Supplementary Planning Document (SPD).</p> <p>Details of the adopted methodology and standards, which form part of the Open Space for Larger Towns in Cornwall can be found at: http://www.cornwall.gov.uk/environment-and-planning/parks-and-open-spaces/open-space-strategy-standards. Whilst this was done for nearby Saltash, it has not been done in the Parish of Landrake with St Erney. The draft NDP includes in Policy 9, the protection of open space (9), which references a map at appendix 3, where numbered areas are shown. Not only are these facilities not properly named or their facilities described, but nothing is done to evaluate what is currently provided, what the quality is like, what age groups catered for, how accessible sites are or how barriers such as the A38 affect their use. Consequently there is a lack of analysis to determine the different categories & function of these open spaces, or how this provision compares, or where there are areas of deficiency and what opportunities need to be looked for. So if as in Intention 14.2.1, support will be given to providing new facilities, how will it be determined 'how and when these are required'?</p> <p>Standards are necessary to quantify spatially and/or financially what is required from developers, and to evidence the priorities or the need to protect areas. The absence of this defaults the details to generic standards left from the former Caradon District Council policies that referenced National Playing Field Standards, which have been found to be problematic.</p> <p>We recommend that assessments of open spaces and the setting of future standards (quantity, accessibility & quality) should follow the same methodology and use the same definitions as set out in the adopted strategy for larger towns, in order to ensure a consistency with the planning policies throughout the county.</p> <p>We regret that the Public Space Team is unable to provide this service free of charge at this time, but should you require advice on the application of the methodology or its conclusions please do not hesitate to contact us.</p>	<p>Whilst the point is noted, the NDP policy we consider is about supporting provision and improvements in principle, is not about being too prescriptive and seeking to safeguard spaces that are highlighted as of value to the local community in line with paragraph 76-78 of the NPPF. No action required, it is not considered that the sites need to be evaluated to the extent as outlined to support the policy stance.</p>
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<p>Local Plan Team- Community Infrastructure Levy (CC)</p>	<p>Unlike other NDP's, this NDP does not appear to make reference to specific types of infrastructure which they would like to deliver, and so it is difficult to provide any specific comments on the draft NDP within a CIL context. However, I have made some general comments below which may be of interest to the group in relation to the proportion of CIL income which they may receive from any CIL liable development.</p> <p>It would be useful for the NDP Group to be aware of the infrastructure projects/types on which Cornwall Council intend to spend CIL income. This is detailed in the Regulation 123 List, the current draft of which is available via the 'List of Submission Documents' on the Council's website at www.cornwall.gov.uk/cilexamination.</p> <p>It is essential that CIL income is not spent on infrastructure for which S106 has been or will be sought, as this would be seen as double counting (charging developers twice for the same infrastructure).</p> <p>The percentage of CIL which the Parish Council will receive (15% of CIL raised from development in the area, or 25% with an adopted NDP) can be spent on a more flexible definition of infrastructure than Cornwall Council must apply, but it is still important to check this does not contradict the Regulation 123 List.</p> <p>For larger projects, it is possible for the Parish Council to pool their CIL income with that of Cornwall Council in order to make the money go further, and the CIL Regulations encourage local Council's to have discussions with the Charging Authority (Cornwall Council) to see where efficiencies can be achieved.</p>	<p>Comments noted, no action required.</p>
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<p>Cornwall Fire & Rescue (CC)</p>	<p>Cornwall Fire Service is working with partners in Cornwall Council and social landlords to ensure that new housing stock is suitable for the aging population and groups identified as being at more risk for fire in their homes.</p> <p>The housing for an older population report recommends that Councils include housing for the elderly in the community as care feature of local plans and that the Happi recommendations are included in the design of retirement accommodation. This includes accessibility and the use of monitoring technology.</p> <p>The use of domestic sprinkler or misting systems greatly reduces the risk of fire developing to a stage where it becomes life threatening. The changes to building regulations in Wales making sprinkler installation compulsory all domestic premises had reduce the cost of installation and improved availability of suppliers. Sprinklers save lives.</p> <p>The inclusion of fire sprinklers in all affordable housing should be included as a requirement for developers.</p>	
<p>Affordable Housing (CC)</p>	<p>Policy 1 The Affordable Housing team supports the intentions of this policy but highlights that the Cornwall Homechoice affordable housing need figure (Nov 2017) for the parish is currently 27 which could account for nearly all of the 25-30 dwellings limit set out in this policy over the plan period of 2017 – 2030. The AHT is supportive of the flexibility provided in the policy wording which allows for development exceeding this figure if it is supported by a robust evidence base that the housing will respond to local need.</p> <p>Policy 2 The AHT supports this policy.</p> <p>Policy 3 The AHT supports this policy but advises that 'Home Choice' is corrected to 'Homechoice' and that the policy refers to other sources which identify local housing need including Help to Buy South West and any local Housing Need Surveys.</p>	<p>Points noted, Policy 3 wording changed.</p>

<p>Environment Service Landscape Architect Officer (CC) -</p>	<p>As previously advised with an update provided</p> <p>This draft Neighbourhood Development Plan clearly recognises the importance and value of the Parish's landscape. It is also welcomed that the document recognises the importance of the landscape within the Parish which is not covered by a designation which is in line with the European Landscape Convention. This could be further strengthened by stressing that 'every landscape matters' as mentioned in detail below.</p> <p>The document appears to rely on the detail within the 2007 Landscape Character Assessment to under pin the policies (Appendix 2 – Landscape Character Assessments). It would be advisable for the Parish to add further detail to the 2007 Landscape Character Assessment descriptions for CA22-South East Cornwall Plateau and CA25 Lynher and Tiddy River Valleys (which overlie their parish). The 2007 Landscape Character Assessment does not contain sufficient detail to make clear the key elements of the landscape character which need to be conserved and enhanced to retain the distinctive character of this particular Parish.</p> <p>As previously commented it would still be useful to include a description of the characteristics, views and places which are of importance to the local community.</p> <p>The Cornwall Local Plan looks to future development to maintain and respect the special character of Cornwall by identifying the value and sensitivity of the character and importance of landscapes, biodiversity, geodiversity and historic assets. It would be valuable for this NDP to build upon the policy within the Local Plan to add a greater level of detail in the policies, specific to the Parish of Landrake with St Erney. Detailed points are made below.</p>	<p>Noted, yes it was considered to undertake a local landscape character assessment for the area to add further detail, however there was no capacity in the group to undertake the work, and as a result no further landscape assessment has been undertaken. Whilst we appreciate this would have been beneficial, it was not viewed as essential to the success of the NDP.</p> <p>A number of further changes made in accordance with recommendations.</p>
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	<p>Policy 7 - Design Previously the comment was made; 'Does the Parish have a document which details what the key characteristics of the 'character and appearance' of the area are, so judgements can be made as to whether new buildings have an adverse impact?' This is now covered by the Parish Design Guide but it is still recommended that the key landscape characteristics are further highlighted for example to justify the expectation that the Cornish hedge network is retained/protected/enhanced and that new tree planting is required to bolster the significance of hedgerow trees/small copses etc in the landscape. This will also assist in the siting of development, for example it may be preferable to ensure that the expansion of farm buildings is clustered around existing farmsteads rather than in open countryside and that visually prominent ridgelines remain undeveloped etc etc.</p> <p>Policy 15 – Landscape Previously the comment was made; 'Does the Parish have a document which details what the key characteristics of the 'local landscape character' and 'identity of the local surroundings' are, to determine whether applications positively respond to the local sense of place or have an adverse impact upon it?' this is the same point as above.</p> <p>Appendix The Landscape Character Assessment of potential Settlement Growth Options Identified in the Draft Landrake With St Erney Neighbourhood Development Plan (along with Landscape Capacity Appendices) by James Evans BA (Hons) Assoc RTPI is welcomed.</p>	
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Appendix

Parish Design Guide September 2017

i. It is recommended that the Design Guide includes more photographs or drawings of successful and unsuccessful details. It should be clear what constitutes a high quality solution and what does not, including specific recommendations on things like new Cornish hedges, wall design and materials, paving materials, parking solutions, traffic calming solutions, street furniture, new planting schemes etc. This would help to strengthen the supporting evidence base and set of criteria against which developments can be judged to ensure that they meet the Policies relating to Local Distinctiveness, Quality Design and Character.

ii. Ensure that Trees figure strongly; tree retention and protection should be a material consideration in design layouts which should demonstrate compliance with BS5938;2012 Trees in Relation To Construction.

iii. Page 9, perhaps consider extending the final paragraph to reinforce the importance of hedgerows to the landscape character of the Parish; 'Of particular importance is the successful sustainable incorporation of Cornish hedges into development layouts'.

iv. Enhancing Biodiversity; strengthen the statement about buffering Cornish hedges; remove the caveat 'where possible'. Refer to Cornwall Council 'Biodiversity' Supplementary Planning Guidance notably all proposals should follow the guidelines outlined in Appendix C –'Cornish hedges and Development'. This could be added to the Design Task Checklist.

Task 6, consider extending the statement 'Have you retained existing landscape features such as trees, hedge boundaries, wildlife habitats etc' and provided an appropriate buffer/margin.

Appendix A

'Proposed Settlement Boundary'; for clarity it would be helpful to annotate sites A, B and C.

	<p>13.1.2 Typo; considered instead of considerable Possible extension of this statement to focus on the retention of Cornish hedgerows and planting of new trees; It is not wished to stifle innovation, but to expect development to respond appropriately to its setting through choice of materials, form, scale or detailing. Consider adding; 'In this regard all new development should reflect; i. the findings of the emerging Cornwall Council 'Biodiversity' Supplementary Planning Guidance notably all proposals should follow the guidelines outlined in Appendix C -'Cornish hedges and Development' where the most desirable scenarios are given for developing near existing hedgerows. ii. all new development will be expected to make provision for the sustainable planting of new 'trees for the future' particularly concentrating on locally found species'.</p> <p>Landscape 15 This could be opportunity to discuss the significance of tree cover and how this contributes to the landscape character and quality of the landscape of the parish. It is recommended that a Policy is included that seeks to both protect the existing tree cover and to encourage the planting of new areas of woodland and 'trees for the future'; every development should be considered as a potential opportunity. Appendix 7 Wrong word used? The Parish is covered by two of the 2005-2007 Landscape Character Areas instead of Assessments.</p> <p>The document states; 'The results of our first Consultation survey highlighted how much residents love and appreciate the rural setting of the village and the enjoyment obtained by walking in the surrounding countryside and observing the activities on the farms'.</p> <p>Consider strengthening this by adding; 'This demonstrates the principle that 'every landscape matters''.</p>	
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11 Conclusion:

The Consultation Responses that were received have been thoroughly considered and the response of the Steering Group and resulting actions detailed in the table shown in Sections 10.

This Consultation Statement is considered to comply with Section 15(2) of Part 5 of the 2012 Neighbourhood Planning Regulations.