

ST CLEER PARISH
NEIGHBOURHOOD DEVELOPMENT
PLAN 2019 - 2030
REGULATION 14 CONSULTATIONS
RESPONSE ANALYSIS

St Cleer Parish Neighbourhood Development Plan
Steering Group



INTRODUCTION

This report analyses the comments made in response to the formal community and statutory organisation consultations carried out on the St Cleer Neighbourhood Development Plan under Regulation 14 of the Neighbourhood Plan Regulations from 29th March to 19th May 2019. It also records the Steering Group and Parish Council's considered responses to those comments and sets out the modifications to the St Cleer Neighbourhood Development Plan that are proposed to be made in preparing the submission version of the Plan.

The main part of the document discusses the various comments made on each theme and policy in the NDP.

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

Please note that the identity of all those who commented, apart from those from organisations and developers/landowner, is considered to be confidential and will not be generally released by the Steering Group. If you wish to identify the Steering Group's response to your own comment, please contact the Parish Council.

SUMMARY OF REPRESENTATIONS

Overall

Response to the draft St Cleer Parish NDP was generally fairly muted in comparison to earlier engagement, partly reflecting the 'front-loading' of engagement and consultation carried out as the NDP emerged, and an absence of seriously controversial proposals as current planning applications at the time of the consultation.

Statutory Organisations.

Comment from statutory organisations was also limited, restricted to Historic England, National Grid, SWW and D&C police. Very few such organisations have interests located in the designated area which the NDP might impact upon. Historic England was pleased to note the extent to which the St Cleer community values its distinctive local historic environment and reflects this in the suite of policies for its protection and enhancement. However, it was concerned that NDP's development proposals did not appear to demonstrate that they have taken account of the need to protect and enhance the historic environment in accordance with the provisions of the National Planning Policy Framework (NPPF). This comment does not pick up the Sustainability Appraisal carried out for the NDP, which covers heritage matters. However, it is understood that this aspect is covered through the SEA Screening Opinion consultations with that organisation. NG recoded an absence of their plant in the NDP area, whilst SWW noted that the potential housing growth planned for was not considered to be a problem in terms of its ability to support. D&C Police advised that a reference to 'designing out crime' be included in the NDP.

Local Organisations

The only local organisation to respond was the Bodmin Moor Commoners Council, which supported the Local Green Spaces designation on moorland and suggested a reference be made to the infrastructure needed to bring about increased moorland grazing.

Community Responses

Overall a lower level of response was received than anticipated based on the community engagement surveys carried out in the period when the St Cleer NDP was being drafted and the fact that a summary leaflet was delivered to every household, explaining the NDP provisions and inviting comment. Judging by comments made by those

attending the 3 drop-in sessions held during the consultation period, this may be due to the ‘front-loading’ of the engagement process earlier in the NDP’s gestation, and a general level of satisfaction with the provisions of the NDP, which do not include large housing allocations adjoining villages.

The comments that were received, totalling 66 separate forms (of which 9 contained a name but were otherwise blank), were mainly concerned with local highway safety matters, the inadequacy of physical and community infrastructure to support residential development, and the proposals for land r/o the Stag, St Cleer, and at Horizon Farm.

Developer Responses

One developer responded, Wain Homes, opposing the NDP proposal for Horizon Farm, and suggesting an alternative site adjoining St Cleer village.

Cornwall Council Officers Response

Useful comments were received from Cornwall Council, which will help better shape the policies in the plan. However, it is also clear from these that some issues of very local concern are not fully appreciated by planning officers, illustrating the value of NDPs in getting these brought into consideration when planning matters are determined.

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 ST CLEER NEIGHBOURHOOD DEVELOPMENT PLAN

RESPONSE REFERENCE	SUMMARY OF ISSUES RAISED	STEERING GROUP RESPONSE	PROPOSED AMENDMENT TO NDP IF REQUIRED
A1[1]	Thanks for Regulation 14 consultation. Pleased to note the extent to which NDP values distinctive local historic environment and reflects this in the suite of policies for its protection and enhancement. Our congratulations on the progress made to date and our best wishes in the making of your Plan.	Noted	n/a
A[17]	National Grid have no assets in the area.	Noted	n/a

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B4	No specific reference to designing out crime, disorder or anti-social behaviour. Whilst these matters are covered within other national and council policies which you reference, they should also be in your NDP. Suggest that the following statement or similar is included where appropriate within the NDP "All development proposals should where necessary consider the need to design out crime, disorder and anti-social behaviour to ensure ongoing community safety and cohesion" This can apply to all forms of development not just housing. May also be just as relevant for new 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.	Accepted.	INCLUDE APPROPRIATE REFERENCE IN POLICY 8 AND THE ST CLEER DESIGN GUIDE.
C1, C4, C16, C17, C26, C28, C63[1]	Fully support the plan	Noted	
C6[1]	Applaud the efforts of the team so far with thanks for the huge amount of work.	Noted	
C30[1]	Have read the draft plan and on a whole agree with the content.	Noted	
C28[1]	An incredible document and I wholly support it. We just need to keep the planet at the forefront of our thinking.	Noted	
C44[11]	No further development to be allowed other than in NDP.	Noted	
C49[1]	The proposed plan has recognised the requirements of the residents of the parish and has the capacity to any minor adjustments without altering the overall benefit which would be created.	Noted	
C56	Totally support the NDP with a slight unease about any social housing being seen as 'out of the way' of the village itself.	Noted	

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C65{1}	This latest St Cleer NDP is a vast improvement on the earlier version.	Noted	
E2{1}	St Cleer NDP team should be commended for their thorough research of their natural landscape assets and their policies regarding trees/hedgerows/biodiversity.	Noted	
E4{1}	Document IS very comprehensive and weighty document with a large number of policies and lots of supporting text. A lot of repetition within policies which could be made much punchier if the wording was simplified and shortened and some of the policies consolidated. Should also have a set of good quality plans (hard copy and digital) alongside the document. The layout/arrangement of policies could follow a more logical order i.e. grouping the development boundary policies, the housing policies and the horizon farm policies together etc., the grouping of all design policies etc.	Noted. However, is considered that this depth is needed to ensure that all aspects of concern raised during community engagement are covered, and fully understood by the local community, who less familiar with NPPF and CLP policies than are officers and can better understand policies where their exposition is self-contained. The order in which the policies is presented follows the prioritisation of the themes in community engagement feedback. High quality maps will be included on the NDP website.	INCLUDE HD MAPS ON WEBSITE.

**TABLE 2: COMMENTS MADE ON SPECIFIC THEMES, POLICIES AND TEXT OF THE
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PLAN SECTION	SUMMARY OF ISSUES RAISED	STEERING GROUP RESPONSE and PROPOSED AMENDMENT TO NDP IF REQUIRED
Sections 1 to 5	No comments received.	n/a

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6. ST CLEER PARISH: AN OVERVIEW OF ISSUES AND IMPLICATIONS FOR THE NDP	Oppose statement that 'Support for a grocers or farm shop in St Cleer Parish could reduce the need to travel to Liskeard or elsewhere outside the Parish for main and 'top up' food shopping, and provide a source of basic employment, community focus, and informal meeting." St Cleer Parish already has a farm shop, which is the Horizon farm shop. C22	Not accepted. The statement is a matter of fact, and fortunately the present Horizon Shop is fulfilling the outcomes described. The NDP seeks to ensure such benefits are retained. NO CHANGE
7. THE VISION FOR ST CLEER PARISH	No comments received.	
8. ST CLEER PARISH NDP: OBJECTIVES	No comments received.	
Policy 1: Settlement Development Boundaries	Oppose – not needed. NPPF/CLP are adequate. Better to have 'a handful of new homes' spread about on settlement edges than on unsustainable site at Horizon Farm C29[1] Support C38[2], C47[1], C65[2] . OK no comments E4[2]	Not accepted. The use of development boundaries makes the application of planning policies more explicit and understandable to local users and would be appropriate even if Horizon Farm was not proposed. Para 2.32 of the Cornwall Local Plan states that <i>'The focus for rural settlements is to meet local need while reflecting and respecting the character of settlements. Neighbourhood Plans may, if they feel it appropriate, look to identify specific settlement boundaries consistent with this approach'</i> . INSERT REFERENCE TO PARA 2.32
Policy 2 Rural Gaps	Support C27[3], C47[2], C38[3] Support to maintain the character of the individual settlements and preserve wildlife corridors C12 . Support but policy should be clear on approach to affordable housing in rural gaps C65[4] Extent of the rural gap and the AONB designations, together with the position of the settlement boundaries would rule out virtually any rural exceptions development across the plan area. Criteria 2 wording should state 'any proposals for new housing within the rural gap areas will be subject to CLP Policy 7.....' E4[3]	Support noted. See below on status of affordable housing in rural gaps. Not accepted. The AONB only covers Common Moor and is not contiguous with the other settlement development boundaries or rural gaps. Some Policy 9 sites would be possible on boundaries facing away from rural gaps. The need for affordable housing is described as 'moderate' by the Affordable Housing team at CC so the limit on opportunities available created by the policy is not unacceptable.

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	<p>Wording of part 3 is confusing. With part 2 ruling out any development within the rural gap (except for Policy 7 development), part 3 then goes on to confirm proposals will be supported subject to.... Can the wording be made clearer – what development will be supported within rural gaps? Perhaps wording should state ‘Any other development proposals coming forward within the rural gaps areas should be designed to maintain the separation.....’E4[4]</p> <p>It is noted that the Penhale development site is included within the rural gap area yet the planning application for this is to be shortly approved subject to S106 (PA18/02930 relates). Should the extent of the rural gap be revised to reflect this? E4[5]</p> <p>It is also noted that the gap between Lower Tremar and the Horizon Farm development is also within the rural gap. Should it be excluded as the development of this gap has the potential to create linkages (pedestrian) with Lower Tremar – helping to make the development more sustainable. E4[6]</p> <p>This ‘rural gaps’ policy is not required because this land would fall under Policy 7 of the CLP as forming part of the ‘open countryside’. Exception sites are outlined in policy 9 and only accepted on sites ‘adjacent to the existing built up area of smaller towns, villages and hamlets’ and ‘would be well related to the physical form of the settlement and appropriate in scale, character and appearance.’</p>	<p>Accepted that the first lines of part 3 could be confusing. Therefore, to be clear, AMEND POLICY 2.3 TO REFER TO POLICY 7 DEVELOPMENT</p> <p>Accepted. Application PA18/02930 was approved on 11th July 2019</p> <p>Not accepted. The area between Lower Tremar and Horizon Farm comprises an area of c.4ha which could accommodate a considerable amount of housing. This would be a significant incursion into the countryside that would link the existing settlement with the proposed development at Horizon, setting an unfortunate precedent for other villages, whilst doing nothing to add to the sustainability of Horizon as Lower Tremar has no community facilities. Conversely, it could be argued that such an extension of Lower Tremar would add to the sustainability of that settlement through the access to the new facilities at Horizon.</p> <p>Not accepted. The rural gaps policy is not intended to supplant or repeat CLP Policy 7, but to add detail to it in these important areas where coalescence of settlements is a significant risk if Policy 7 alone were to be applied. NDP Policy 2 does not rule out development but requires it to be developed in a way that helps preserve the open characteristics of the land between the settlements. However, whilst</p>

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	E5[1].	the value of CLP Policy 9 in delivering affordable housing is appreciated, it is considered that the distribution of several well-defined settlements with a lengthy edge of ‘built up area’, in close proximity to each other, could cause a greater frequency and concentration of ‘exceptions’ than the policy was intended to achieve, seriously harming the characteristics that NDP Policy 2 is intended to protect. This would also have the potential to increase pressures on the local road network and community services, and add unreasonably to populations in settlements lacking basic services. Therefore the defined rural gap area is not considered to be suitable for CLP Policy 9 developments. AMEND SUPPORTING TEXT TO INCLUDE ARGUMENT SET OUT ABOVE.
Policy 3: World Heritage Site	Support, C35[1], C30[4],C38[4] – Old railway line should be preserved as heritage. Policy replicates CLP Policy 24 and the NPPF and doesn’t appear to bring anything new. Is it therefore necessary? E4[7]	C35[1], C30[4,] C38[4] Support noted. Policy 3 and CLP Policy 24 do act to preserve the old railway line which is specifically identified as a wHS heritage asset. E4[7] Not accepted. The policy does in part repeat NPPF/CLP policy but adds local precision to them and emphasises that the protection of OUV is extended to heritage assets that are not otherwise protected.
Policy 4: Landscape & Heritage Views and Vistas	Support C25[1], C35[2], 38[5]. Can greater consideration be given to the wording ‘detrimental effect’ to reflect a more balanced consideration of the issues? Perhaps ‘significant detrimental effect’ E4[8].	C25[1], C35[2], 38[5] Support noted. E4[8] Accepted. AMEND POLICY 4 ACCORDINGLY
Policy 5: Heritage Assets at Risk	Support C25[2],C35[3],C38[6] Reference should be to the Council’s Historic Environment Service E4[9]	C25[2],C35[3],C38[6] Support noted. E4[9] Accepted. AMEND POLICY 5 ACCORDINGLY.
Policy 6 Local Listing	Support C35[4], C38[7]. Local listings should be shown on the Maps E4[10]	C35[4], C38[7] Support noted. E4[10] Accepted. INCLUDE LOCAL LISTING PROPERTIES ON THE VILLAGE MAPS.
Policy: 7 Design in Historic Core	Support C35[5], C38 [8] OK no comments E4[11]	C35[5],C38 [8] Support noted. E4[11] Noted.

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Policy 8: Design in New Development	Support with emphasis on low-carbon and energy efficient homes C32[6] . Include 'any new building should be styled on a farm/cottage style to include uses of dormers/local stone where appropriate' C54[1] . Recognise the need to conserve water and ensure that any future development and plans for the parish take this into proper account, and alongside this, take the lead regarding the management and creation of ponds and other natural water features within the parish C63[2] . Consideration should be given to the addition of fire sprinklers in new homes for at risk group E3 Amend to omit the requirement for applications to include a statement demonstrating how the St Cleer Design Guide has been taken into account? For example – if an application were submitted without such a statement – yet the design of the development did accord with the Design Guide, the way the policy is worded means that the application should be refused – which wouldn't be reasonable. Perhaps just the supporting text could simply suggest that applications should be accompanied by....' E4[12]	C32[6] Support noted. C54[1] Accepted in part. However the NDP cannot reasonably be so prescriptive on design as this would put the Plan outside the terms of NPPF/CLP policy. C63[2] Accepted. However, the role of the Parish Council is not within the remit of an NDP. E3 Not Accepted , fire sprinklers are an internal building issue not within remit of an NDP. E4[12] Accepted. ADD REFERENCE TO SUSTAINABLE WATER MANAGEMENT TO POLICY 25, AMEND POLICY 8 TO INCLUDE 'WHERE APPROPRIATE'.
Policy 9: Dark Skies	Support, should be little or no street lighting C34[2] C50[1] Not clear where this policy applies E4[13]	C34[2] C50[1] Support noted. E4[13] Accepted. AMEND POLICY 9 TO INCLUDE REFERENCE TO THE DARK SKY PARK AND ITS BUFFER ZONE, ENLARGE MAP 5.
Policy 10: Community Infrastructure Levy	Support with modifications – St Cleer not currently eligible for Neighbourhood Portion of CIL. In addition to any neighbourhood style payments that are made to zone 5 areas, following a public consultation last year, it is being proposed that the rest of the 'strategic share' will be made available via a bidding process, with a focus on local projects. A funding process and application criteria for this are now being developed. It is unlikely that a funding round will be held until mid-2020 at the earliest. Any additional CIL money that St Cleer is able to secure from the 'strategic share' will need to be spent in line with the CIL Regulations – a strict interpretation of infrastructure and justification that the	E1 Noted. E14[14] Accepted. Reference should be to Figure 6 which is missing. INSERT FIGURE 6 LIST OF POTENTIAL CIL PROJECTS.

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	<p>spend will support development in the area. Table 2 – Evidence Base Summary is welcomed. However, it needs to be clearer as to which projects CIL can contribute towards. Refer to the Regulation 123 List which is a list of what Cornwall Council will not request S106 developer contributions for, and is available to view at http://www.cornwall.gov.uk/cil. E1 Cannot find Table 2 E4[14]</p>	
<p>Para 9.3.4</p>	<p>Unclear what is meant by the text ‘Where it can be demonstrated that it is not feasible to do this, the Council will seek to ensure all ‘allowable solutions’ or ‘biodiversity offsetting’ payments are invested in projects within the St Cleer Parish’. Suggest deleting this final sentence E5[2].</p>	<p>E5[2] Partly accepted. The box is included to ensure that users of the NDP will be aware that infrastructure contributions are required from new development and is largely drawn from CLP Policy 28. However, the reference to ‘allowable solutions’ is anachronistic as HMG did not proceed with this form of agreement. AMEND SENTENCE.</p>
<p>Policy 11: Community Facilities</p>	<p>Support but we need: A multi- purpose space C32[1] a bee-keeping area C32[4] Possibly a ‘pop-up’ shop in Church Car Park? C44[9] C57[4] Health Centre, bigger school and post office in St Cleer C47[3], C51[1] To use Stag as a pub again C57[5] Ok no comment E4[15] Liskeard parish church layout with pews removed and underfloor heating makes the church a significant new amenity that could be tried at St Cleer C34[4] Delete following wording “Developer contributions to off-set the impact of additional users on these facilities resulting from new residential development will be supported.” Not necessary and unclear as to how such payments would be calculated E5[3].</p>	<p>C32[1], C32[4], C44[9], C57[4], C47[3], C51[1], C57[5], C34[4] Support noted. However, investment in the forms of community provision suggested is outside the remit of the NDP, which can only really help create the land use conditions in which such provision comes forward if the providers of such are willing to invest in and manage them. E4[15] Noted. E5[3] Accepted, but note that CLP Policy 28 says that ‘Contributions will be used to provide or enhance local infrastructure that is adversely affected by the development of a site but which will not be delivered on that site’ which is largely the same as Policy 11. AMEND LAST CLAUSE OF POLICY 11 TO CLARIFY.</p>
<p>Policy 12: Young Peoples Facilities</p>	<p>Support C51[2] A play space that exists within a ‘re-wilded’ rural setting C32[3] Ok no comment E4[16]</p>	<p>C51[2] Support noted. C32[3] ‘Rewilding’ is a matter of how a site is managed, and not within the remit of an NDP. E4[16] Noted.</p>
<p>Policy 13: Local Green Spaces</p>	<p>Support. Many of the smaller, more urban commons are no longer grazed and in places there is pressure to use the common as extensions of the houses adjacent to it. The designation of urban commons as local green spaces will add</p>	<p>B1, C19, C38[8], C53[1], C63[3]. Support noted. To be clear, the reference is to parts of the Common Land area which is close to development and frequently used by residents. Although the grazing of the Commons is not a land-use matter that the NDP can control,</p>

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	<p>to the protection of the urban commons and resist actions that would “harm the openness and special character”. Under-grazing or the complete lack of grazing on these urban commons is an issue. It would be useful to make a statement in the plan about supporting any infrastructure such as water troughs and fencing which are required to bring about active grazing and facilitate management of these commons B1. Support. Maintenance of the Commons is vital to the appearance of the parish. Measures should be encouraged which will restore the grazing by stock of the commons in proximity to the villages and help to clear them of the overgrowth. Also risk to the safety of people and property if any of these areas should catch fire C19. Support C38[8]. Support - Reintroduce grazing of St Cleer Downs and Tremar Coombe Common C53[1]. Support - Parish Council should commit to a plan for local people to form a working group to create a community forest garden and rewilding scheme on a suitable site in the Parish. C63[3]. Ok no comment E4[17]</p>	<p>reference to the issue should be included. E4[17] Noted. AMEND TEXT TO INCLUDE REFERENCE TO COMMON LAND AND GRAZING.</p>
<p>Policy 14: Trees, Cornish Hedges & Hedgerows</p>	<p>Support C38[9], C63[4] See above Support subject to following advice: <i>Criteria 14.c</i> Consider expanding upon this to ensure non-ancient woodland is protected accordingly: “Where proposed development abuts existing woodland, a 10m buffer (minimum) between residential or commercial development and edge of canopy (as present at time of survey) is required.” E2[2] <i>Criteria 14.2:</i> Guidance is currently being updated. Consider that many non-native trees and those grown elsewhere in the UK are highly appropriate for use within a development and may be sourced from other specialist UK nurseries which offer trees that cannot be sourced within the County. A diverse species palette is likely to be paramount in ensuring climate change and pest and disease resilience. From British Standard</p>	<p>C38[9], C63[4] Support noted. E2[3 - 5], E4[18], E4[21]. Support and helpful comments noted. Many of these can be usefully incorporated. E4[19] The 15m requirement is set out in the guidance given by Natural England and Forestry Commission (known as ‘standing advice’) to help Planning Authorities decide on development proposals affecting ancient woodland, ancient trees and veteran trees. Standing advice is a ‘material planning consideration’ which should be taken into account when making decisions on planning applications. See: https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences E4[20] Accepted. The footprint of the built development is the intended reference. E4[22] Accepted. The correct reference is to the Cornwall Biodiversity Action Plan (BAP). AMEND POLICY ACCORDINGLY</p>

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	<p>8545-2014: There are many variables to be considered when choosing a species for any particular site. These variables relate to both the trees to be planted and the conditions in which they are to grow. Design demands are often paramount, but cannot be considered in isolation from all the other factors involved in suitable species selection. All impact on the likely success and longevity of any planting undertaken. E2[3]</p> <p><i>Criteria 3:</i> Consider revising in accordance with aims and intentions of Biodiversity SPD aiming for “no net biodiversity losses”. 2 for 1 replacement of linear boundary features is likely to not be feasible therefore “Net gains of Cornish hedge and canopy cover” may be a more achievable outcome. E2[4]</p> <p><i>Criteria 4.</i> Add ‘in accordance with the latest version of British Standards 5837’. Also consider “proposals should be accompanied by a scheme depicting the method by which retained trees and hedges will be protected for the duration of development.” E2[5]</p> <p>Consider re-wording the policy to ‘development proposals should seek to mitigate impacts on trees, Cornish hedges or hedgerows by; a).Sympathetically incorporating and retaining trees, Cornish hedges and hedgerows of good arboricultural.....’ E4[18]</p> <p>Also – what is the evidence for a 15 metre buffer between development boundary and ancient woodland? E4[19] Also what is meant by development boundary - The red line area of an application - The settlement boundary - The footprint of the built development? E4[20] Requirements for replacement trees to be of proven Cornish provenance may be difficult to enforce E4[21] Where is the Habitat Action Plan? E4[22]</p>	
Policy 15: Habitat and Biodiversity	Support C38[10], C63[5] See above	C38[10], C63[5] Support noted. E4[23] Not accepted. To be useful and informative to local people the references are considered necessary.

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	The policy relies on checking various documents which are already material considerations (SPD) and also British Standards. It is really necessary? E4[23]	
Policy 16: Housing Infill	<p>Oppose – traffic, community infrastructure reasons C5, C48[1] Oppose – enough agricultural dwellings in the area C31[1] Oppose - The plan should give a minimum preferred percentage of affordable homes within new developments so that we can encourage and help local youngsters to stay in their local area C46[2] Support C30[2] C38[11], C44[5] The policy requires the inclusion of starter/later life homes and family homes where appropriate. The meaning of ‘where appropriate’ should be defined. When and in what circumstances are these types of homes required? E4[24] Part d requires development to be of a similar curtilage to adjacent existing properties. Curtilage has a specific meaning and the word doesn’t really fit here. Is the policy trying to ensure the plot sizes are similar to adjacent existing properties? If so – wording should be amended to reflect E4[25] Part e requires parking for two vehicles – is this for all residential development? What about 1 bedroomed units? What about annexes? What about flats? Is it reasonable to require two parking spaces for a 1 bed/1 person flat? E4[26] Part g restricts development to two storeys. Is this necessary? Some perhaps sloping/slip level sites might be suitable to accommodate a three-storey development. Also – what about loft conversions/accommodation within the roof? Policy would rule this out. E4[27] COMMENTS ON THE CRITERIA a. This requirement is already covered by policies 23 & 24 of the CLP E5[4]. b. This is already set out in the policy text above – “that respect the setting, scale, form and character of the settlement” E5[5]. d. See comment above E5[6].</p>	<p>C5, C48[1] Not accepted. Traffic and community infrastructure impacts resulting from infill development – usually one or two dwellings in an already developed frontage – and the reuse of previously developed land within settlements, will be minimal. C31[1] Not accepted, the policy is not about agricultural dwellings, which fall to be considered under CLP Policy 7. C46[2] Not accepted. CLP policies 8 and 9 set affordable housing quota requirements. C30[2] C38[11], C44[5] Support noted. E4[24] Accepted. Infill development is of too small a scale to reasonably require the provision of starter/later life and family homes. Instead a reference to an evidence-based mix in policy 18 is more realistic. E4[25] accepted. E4[26] Not accepted. The proportion of the Parish population with two or more cars / vans is 34.6%, which is significantly higher than county (28.20%), regional (28.3%) and England (24.7%) averages. This reflects the parish’s rural nature and poor access to public transport networks - most people in St Cleer travel to work by car (79.8%). In community consultations parking congestion was seen as a priority issue. As 1 bedroom homes can accommodate 2 people, and many do, it is considered reasonable to require two parking spaces. E4[27] E5[5], E5[9] Accepted. The opening requirement for development which respects the setting, scale, form and character of the settlement achieves the same effect. E5[4] [6] Not accepted. This is a helpful restatement of elements of CLP policies 23 and 24 in the context of infill. E5[7] Accepted. E5[8] Not accepted. Obstruction of roads and driveways was a very high priority issue with the community in NDP consultations and a clear and explicit statement in this policy is necessary. AMEND POLICY ACCORDINGLY</p>

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	<p>e. Minimum parking requirement for 2 vehicles may not be required for all forms of new development – such as flats. [Suggest adding the caveat, “unless justification is provided which demonstrates that parking is not required.”] E5[7].</p> <p>f. Does this preclude any development onto a single width road? Suggest deleting this point because ‘safe and suitable access’ is required under policy 27 of the CLP E5[8].</p> <p>g. What is the justification for limiting development proposals to two storeys? Appears overly restrictive and unnecessary as policy 12 considers the implications of scale and design on existing properties E5[9].</p>	
Policy 17: Housing Allocations	<p>It is important that development proposals demonstrate that they have taken account of the need to protect and enhance the historic environment in accordance NPPF. Could find no information within the Plan or in the supporting documents to indicate that the policies as drafted can be delivered without causing harm to heritage assets A1[2].</p> <p>Potential housing growth is not considered to be a problem in terms of SWW ability to support A[24].</p> <p>Support C27[1], C38[12], C44[6]</p> <p>Oppose (Land r/o Stag) – traffic, community infrastructure reasons C5, C30[3], C48[2], C51[3], C57[1], C57[2], C58[1], C59[1], C61[1]. Any development must be less than 10 dwellings with access via Stag CP, C60[1], C66. Ensure all hedges are retained, enough parking within the development, need to take care of road safety C8. Oppose (Hendra Close). The site is no longer required to fulfil housing requirement and is not welcomed by the people of Darite C19 Homes for local people only to be allowed C31[3] Oppose - The plan should give a minimum preferred percentage of affordable homes within new developments so that we can encourage and help local youngsters to stay in their local area C46[3]. Any development should be on outskirts of the village C58[2]</p>	<p>A1[2] Not accepted. Heritage impact assessment of settlement development boundaries, rural gaps and sites is included in the sustainability appraisal. A[24] Noted.</p> <p>SITE 1: Land r/o Stag: C27[1], C38[12], C44[6] Support noted. C5, C30[3], C48[2], C51[3], C57[1], C57[2], C58[1], C59[1], C61[1] (Land r/o The Stag PH) Not accepted. The site is completely enclosed by development and close to St Cleer village community facilities so is eminently sustainable. C60[1], C66, C8 Accepted. The Parish Council has indicated its support for application PA18/10144 for 9 houses on the site. AMEND POLICY 17 Site 1 ACCORDINGLY TO ‘ABOUT 9’ HOMES.</p> <p>SITE 2: Land at Hendra Close. C19, C31[3], C46[3]. Accepted. In view of the approval of application PA18/02930 (Penhale Farm) for 26 dwellings the baseline target for the Parish is now 0 and this site is not required. DELETE POLICY 17 Site 2.</p> <p>SITE 3: See Policy 22</p> <p>E4[28] Accepted. AMEND POLICY TO CORRECT NUMBERING. E5[10] Not accepted, an indication of likely housing product form sites is essential for</p>

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	<p>Policy refers to paragraphs i to viii above – is this is mistake and should refer to parts a to h of Policy 16? E4[28] Overly prescriptive in terms of numbers which would be considered acceptable. The process should be design led E5[10].</p>	<p>planning purposes and for the community to fully understand what is proposed.</p>
<p>Policy 18: Rural Exception Housing Sites</p>	<p>Support C44[7] Support, but include ‘downsizing’ as a rural exception C6[2], Support C38[13] Oppose Nobody can afford rents why not build council houses? C51[4] Oppose – traffic, community infrastructure, affordability reasons C5, C48[3], C51[4] Oppose - The plan should give a minimum preferred percentage of affordable homes within new developments so that we can encourage and help local youngsters to stay in their local area C46[4]</p> <p>Oppose - is contrary to both Cornwall Local Plan [CLP] policy and National policy (NPPF). The CLP has no such cap on the number of affordable homes included on a rural exception site. As such, this DNP policy artificially limits the prospect of affordable housing led schemes being brought forward within the parish D1[3]</p> <p>The ruling out of rural exceptions development within the AONB is contrary to the policy position of the Cornwall Local Plan where Policy 23 of the CLP supports development within AONB provided development conserves and enhances the landscape character and natural beauty of the AONB and subject to the major development tests E4[29] E4[30] Part IX of the policy requires the include of an appropriate element of 1.5 bedroom bungalow designs that allow a small ancillary room suitable for a carer or family member but is not considered a bedroom. The word appropriate should be defined. In what circumstances will such development be required, and further clarity provided over the small</p>	<p>C44[7], C6[2], C38[13] Support noted. Downsizing by people in need of affordable housing is already possible in the terms of the policy as it stands. Those planning to downsize with sufficient funds, such as ownership of an existing property, can do so through the normal housing market. C51[4] Not accepted. The policy will deliver social housing, which is equivalent to council housing, and the fact that many people in social housing can access benefit payments can help reduce occupation costs. C46[4] Not accepted. CLP policies 8 and 9 set affordable housing quota requirements</p> <p>D1[3], E5[13]. Not accepted. NDPs are entitled to add local detail to strategic policies and a normal maximum is necessary to reassure the local community that this policy will not lead to large scale developments. However, to give some flexibility the word ‘around’ could be inserted.</p> <p>E4[30], E5[11]Accepted. The NDP cannot alter strategic policies to this extent. E4[31], E5[14]. Not accepted. This requirement is in line with advice from CC Affordable Housing that the Cornwall Council ‘will positively support proposals that include 1.5 bedroom bungalow designs that allow for a small ancillary room suitable for carer or family member to stay, but is not considered a bedroom’. E5[12] Accepted. However, restatement in this policy is necessary to support the understanding of the overall policy amongst community users of the NDP.</p>

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	<p>ancillary room – that is not a bedroom but should be suitable for a carer/family member to stay. When is a bedroom not a bedroom? E4[31] POLICY 18 B Exception sites are appropriate in AONB areas as set out within policy 9 of the CLP and if in accordance with policy 23 E5[11]. C. This would be required to comply policy 9 anyway E5[12]. D. Stipulating a maximum is too restrictive and might make some rural exception sites unviable E5[13]. I. I don't understand what this part is trying to achieve? E5[14].</p>	
Policy 19: Green Tourism	<p>Support C38[14], C44[2] it's not clear what is green about this policy/tourism development? The wording of the policy could in theory support new build holiday accommodate sites. Is that the intention? I.e. if a proposal came forward for 10 new purpose-built holiday chalets in the open countryside on a site next to a river which promotes walking – is that acceptable/the intention of the policy? The wording of part 2 should be re-considered - at present it's quite weak E4[32]</p>	<p>C38[14], C44[2] Support noted. E4[32] Partially accepted. The policy could be clearer about the nature of green tourism and its breadth. Also Part 2 requires clearer criteria. AMEND POLICY ACCORDINGLY</p>
Policy 20: Employment in Residential Areas	<p>Support C38[15], C44[3] OK No Comments E4[33]</p>	<p>C38[15], C44[3] Support noted. E4[33] Noted.</p>
Policy 21: Rural Workshops	<p>A 'local businesses first' policy with regard to the take up of any industrial style units C32[2] Support C38[16], C44[4]. Will workshops have reasonable rents for start-ups? Part 3 should be clearer and worded to confirm that where the need cannot be met by the conversion of an existing building, 'new build' proposals will be supported.... What is meant by reasonable walking distance? What if the route is reasonably short, but on narrow, fast roads with no footpaths? E4[34]</p>	<p>C32[2] Noted. Management of industrial units is not within the remit of NDPs. C38[16], C44[4] Support noted. E4[34] Accepted. AMEND POLICY ACCORDINGLY</p>
Policy 22: Horizon Farm	<p>It is important that development proposals demonstrate that they have taken account of the need to protect and enhance the historic environment in accordance NPPF. Could find no</p>	<p>A1[2] Not accepted. Heritage impact assessment of settlement development boundaries, rural gaps and sites is included in the sustainability appraisal. A[24] Noted.</p>

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	<p>information within the Plan or in the supporting documents to indicate that the policies as drafted can be delivered without causing harm to heritage assets A1[2]. Potential housing growth is not considered to be a problem in terms of SWW ability to support A[24].</p> <p>Support C2, C11, C19, C27[2], C36, C50[2], c52C7[1], C60[2], C44[1], C47[4], C59[2], C63[6], C53[2], C63[6] Support if roads Improved C21 Support if requirement for non-reflective buildings be for all buildings on site, C38[17] support if screened the lower side through planting native deciduous trees that grow to a good size over time, eg beech trees, to mitigate the effect of viewing more houses once you leave Liskeard C22[3] Support for extra care only, if built in local vernacular and road network improved C55</p> <p>Oppose – traffic, community infrastructure, urbanisation, viability reasons C3, C5, C9[1], C34[3], C45, C46[1], C62, C64.</p> <p>Oppose - The site is unsustainable because of its isolated location, the lack of suitable foot or cycle paths connecting the site to the surrounding settlements, and the substantial dependency of future occupiers on private vehicles caused by the lack of connectivity D1[1]. Is also undeliverable D1[2], and a better alternative is available at Wain Homes proposed site at St Cleer which could more easily generate the benefits expected from Horizon Farm. D1[3] – see appendix 1.</p> <p>Oppose – not suitable for extra care C6[2] Oppose - totally unsustainable and commercially unviable, there is no interest by developers in extra care, it should be used for eg storage and distribution C24</p> <p>Oppose, adequate retail and employment available in Liskeard C22[2]</p> <p>Oppose – not previously developed land in terms of NPPF and CLP, was primarily agricultural with support facilities, there are far better sites around settlements in the plan area that</p>	<p>C2, C11, C19, C27[2], C36, C50[2], c52C7[1], C60[2], C44[1], C47[4], C59[2], C63[6], C53[2], C63[6] Support noted. C21 Support noted. Proposal includes requirement for highway improvements. C38[17] Support noted. Requirement for non-reflective materials already covered. C22[3] Support noted and modification accepted. C55 Not accepted. Extra care only would not be viable nor feasible on such a large site without other uses being present. Vernacular design and road improvements already included.</p> <p>C3, C5, C9[1], C34[3], C45, C46[1], C62, C64, D1[1], D1[2], D1[3] Not accepted. Road Collision statistics do not indicate that there is a serious problem with highway safety on the approach roads to the site (see appendix 2) and off-site improvements can be included to better manage traffic movements in the vicinity. In terms of ‘local’ community infrastructure the proposal will bring missing services back into the Parish. More ‘strategic’ infrastructure such as health provision can (according to research done as part of the preparation of the Cornwall Local Plan) accommodate the limited amount of growth proposed. The development, if carried out through a masterplan taking into account the criteria set in the policy, would soften the appearance of the site compared to its current very industrial urban style. The site is considered to be more sustainable than most of the existing settlements given that it will include a range of services that are otherwise not present. However, steps can be taken to improve links to St Cleer in particular so that the new development can access services there (and vice-versa). Viability is an issue, hence the need to strike a careful balance that achieves the objectives of the NDP whilst remaining achievable: this is the objective of the master planning approach. The suggested alternative site will not achieve the objectives of the NDP to the same degree as the proposal. Furthermore, community consultations during the generation of the NDP indicated significant community resistance to the inclusion of the site. C6[2], C24, E4[36] Not Accepted. There is currently strong interest in extra care development. CC are running a major project to bring 175 additional</p>

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	<p>would be more sustainable for small groups of 2-5 dwellings avoiding the rural gaps and not harming character or residents amenities C29[2].</p> <p>The way the policy is set out isn't particularly clear. For example, would a development need to include residential, employment and retail or could it just be a residential development or even just a retail development (new supermarket) Similarly, would the residential element need to be both dwellings and an extra care facility or could it be one or the other? E4[35]</p> <p>We would question whether this is really an appropriate location for an extra care facility. It is not sustainable, it is not close to medical facilities and older people/carers would be heavily reliant on private vehicles to access doctors/hospital etc. E4[36]</p> <p>The vision for the site should be clearer in respect of the intended uses/redevelopment options. E4[37]</p> <p>The statement 'an outline application be supported as a first step' is too bold/pre-determines the application. E4[38]</p> <p>Comments from a previous case officer dealing with Horizon Farm: The scheme I was involved with was seeking to redevelop both sides of the highway (Horizon Farm former intensive poultry farm) for a major scale housing scheme. The attached appeal decision effectively put an end to the project. This is not a suitable site for housing. There are no dedicated safe lit routes to Tremar and St Cleer and hourly bus services at best. Horizon Farm would be best utilised for agriculture or horticulture or at a push – low scale employment operation that does not generate significant traffic movements or require footfall from the nearby villages (unless the proper pedestrian connections can be established E4[38A]).</p>	<p>units in the Looe/Liskeard area. The prospectus associated with this does not rule out such a location and references possible 'hub and spoke' operation to extend coverage to rural locations (see: https://www.cornwall.gov.uk/media/36760009/extra-care-area-profiles-45162-web.pdf) C22[2] Not accepted. More retail and jobs available locally will reduce the need to travel and help tackle climate change and its impacts. C29[2] Not accepted. Whilst the site is not 'previously developed land' in the precise terms given in the glossary to NPPF 2019, it is nevertheless a large area of very large buildings and surrounding hard surfaces with a pronounced industrial appearance for which potential alternative agricultural uses are highly unlikely. The concept of a mixed use residential led redevelopment incorporating employment and services, and at a scale where environmental and traffic issues can be better managed, is far more likely to be sustainable than scattering residential around the settlements, most of which lack facilities and services and from which additional travel needs will arise. Also, it is not reasonable, in the absence of detailed study, to suggest that 'small groups of 2-5 dwellings avoiding the rural gaps and not harming character or residents amenities' is possible. The settlement edge assessment carried out by the Steering Group suggests otherwise. E4[35], E4[37] E4[38] Accepted. More is now known about the site and the policy can be re-written to provide greater clarity and broader coverage of issues. E4[38A], E5[15] Not accepted. The application referred to is entirely dis-similar to the NDP proposal and measures are now proposed to address the sustainability issues raised at the appeal. The suggestion that the farm 'would be best utilised for agriculture or horticulture or at a push – low scale employment operation that does not generate significant traffic movements' is wholly unrealistic. Agricultural/horticultural investment on the scale necessary is highly unlikely in this location well away from main markets and processors. However, were it to occur the format and confines of the site imply that it might be in the form of 'concentrated animal feeding operations' which is likely to generate</p>

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	<p>Please also refer to the area team Planning Officer comments in respect of a previous planning application on this site and their consideration that this site is inappropriate for housing due to the lack of sustainable transport links to the main settlement area. Previous appeal decision has indicated that this site is inappropriate for housing. The planning inspectors decision would be a material planning consideration in any future assessment of the site for housing E5[15].</p>	<p>similar issues of smells, noise, pollution and traffic generation associated with the previous egg production activity. Low scale employment is meaningless term, and substantial investment would be needed to convert the existing buildings to a suitable condition. There is a real risk that unless a realistic and common-sense approach is taken to this site it will fall into dereliction or a mishmash of vague uses which create environmental problems and are far less sustainable, or a return to intensive agriculture that would seriously harm the area.</p> <p>General Note relevant to all comments above: NPPF Para 84. Says that meeting local business and community needs in rural areas may have to consider sites <i>‘adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist’.</i></p> <p>UPDATE AND AMEND POLICY TO COVER LATEST POSITION ON HORIZON FARM</p>
<p>Policy 23: Renewable Energy Production</p>	<p>Oppose all types of turbines and arrays big and small due to their visual impact on the landscape C10 Support C38[18], Support, but doesn’t go far enough – Reword to make it clear that all sustainable energy projects can be considered in terms of their energy contribution to mitigate the climate emergency that has been declared C43.</p>	<p>C10 Noted, however, given the apparently very serious position with regard to climate change, some contribution from St Cleer Parish area is a reasonable expectation and the policy does include criteria designed to minimise impact on the landscape. See section 10.3 of the Evidence Base report. C38[18], C43 Support noted. However</p>

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	<p>Exceptional circumstances should be defined E4[39]. Conditions could deal with removing turbines/solar pv and remediating the site (not S106 Agreements) E4[40]. Is part 4 really necessary? These elements are generally already mentioned in the main body of the policy/other policies. E4[41].</p>	<p>given the environmental qualities of the area it would be excessive and unreasonable to support all sustainable energy projects. E4[39] Partly accepted. Policy 23.1.a: With regard to wind turbines ‘very exceptional circumstances’ is imprecise and does not reflect the June 2015 Ministerial Statement that planning applications for wind energy development involving one or more wind turbines should only be granted planning permission where the development site is in an area identified as suitable for wind energy development in a Local or Neighbourhood Plan. The CLP does not identify areas suitable for wind turbines. In practical terms the St Cleer NDP position is that the AONB and WHS are not considered to be suitable for wind energy development, but that the rest of the Parish may be subject to criteria to minimise impact. Therefore Policy 23.1.a would be better phrased to indicate that support will not be given for wind energy development in the AONB and WHS. Policy 23.2.1 With regard to Solar PV, which is not affected by the Ministerial Statement, policy should reflect CLP Policies for the AONB and WHS, the AONB Management Plan, and NPPF Para 172. E4[40] Not accepted. Legal agreements, which appear as a charge on the land, can be enforced in the courts as well as through planning, and are more visible in transactions, are considered to be more effective than planning conditions. E4[41] Accepted. AMEND POLICY TO MORE ACCURATELY REFLECT AONB, NPPF AND CLP POLICY AND COMMUNITY ENGAGEMENT FEEDBACK. DELETE PART 4.</p>
<p>Policy 24: Community Sustainable Energy</p>	<p>Support C38[19]. St Cleer PC should declare a climate emergency and the NDP should reflect this at all levels C63[7]. Can these policies be consolidated/shortened and added to Policy 23 E4[42].</p>	<p>C38[19] Support noted. C63[7] Noted. This is not a matter for the NDP to deal with as it’s an issue of other PC policy. As with other comments relating to non land-use policy matters, it will be passed on to the PC to consider. E4[42] Not accepted. Separation of the policies serves to avoid confusion between the grant of PP and the community benefit.</p>
<p>Policy 25: Design for Sustainable Energy Use</p>	<p>Support. Energy saving and use of renewable energy is vital for the environment. All the new homes and buildings need to prove they</p>	<p>C36[3], C38[20] Support noted. C36[4] Accepted. The policy covers this aspect in broad terms, but a specific reference can be detailed in</p>

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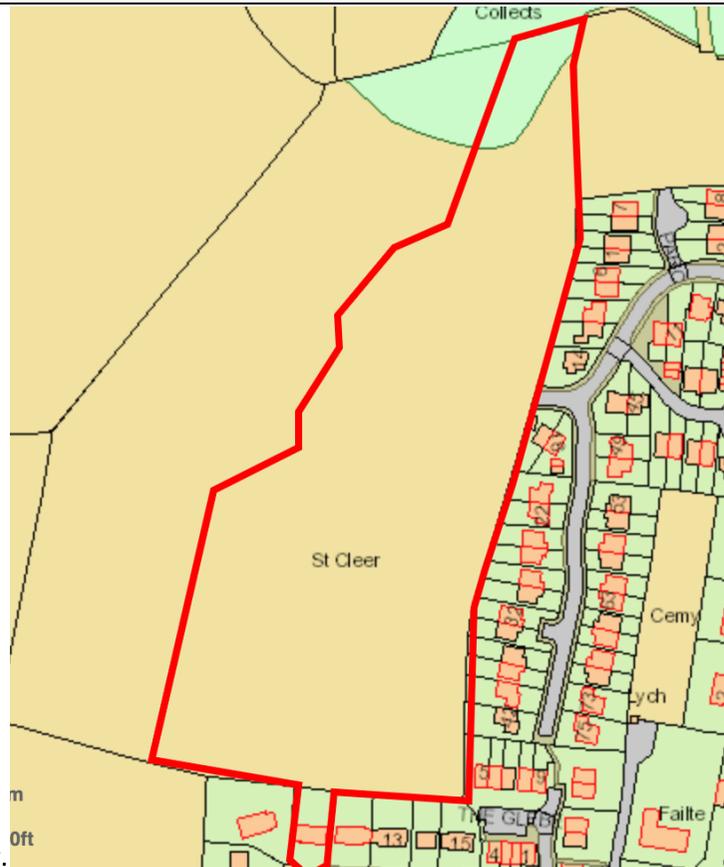
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	<p>are as energy efficient as possible. The developer needs to show how they will ensure this. C36[3], C38[20] To prevent flooding/water run off surfaces need to be permeable therefore driveways and hardstanding areas need to be made permeable or non-permeable kept to a minimum C36[4]. Can these policies be consolidated/shortened and added to Policy 23.</p>	<p>the design guidance at Appendix 1 of the NDP. E4[42] Not accepted. Separation of the policies aids understanding by local users AMEND DESIGN GUIDE TO REFER TO PERMEABILITY OF SURFACES</p>
<p>Policy 26: Transport and Communications</p>	<p>Support C25[3], C7[2], C34[1], C35[6], C44[8] C49[2], C50[3], C57[3] Support but further, traffic calming, speed restrictions should be sought and improvements to Tremar – Liskeard road, perhaps new roads, and parents parking at school sites Support - include a footpath cycleway between Horizon farm and St Cleer and develop a footpath cycleway from St Cleer to Liskeard. Parking insufficient and leads to blocking on Well Lane and generally. C53[3] C9[2] C31[2] More capacity for pedestrians / cyclists C32[5] A community minibuss C44[10] Support - A footpath network should be developed, with a maintenance programme: 40mph speed limit should be introduced in open moorland areas ; a ‘village -link’ minibuss service should be introduced run by volunteers to compliment the bus service; Off street parking should be introduced in all villages to reduce on street parking which block emergency vehicles C54[2]. Ensuring a fit for purpose bus service is vital to our local community and a more regular service is needed to support the younger, older and others unable to afford a car in the community and reduce emissions C36[2].</p> <p>Concerns over the ten-minute walk requirement. E.g. a new agricultural worker dwelling situated in the open countryside, divorced from public transport links would not be able to comply with this policy E4[43].</p> <p>Concerns regarding the car parking requirements as mentioned above E4[44].</p>	<p>C25[3], C7[2], C34[1], C35[6], C44[8] C49[2], C50[3], C57[3], C32[5], C44[10], C54[2], C36[2]. Support and comments noted. However, many of the initiatives suggested are not land use matters that the NDP can deal with. C53[3] C9[2] C31[2] Accepted. Policy 22 will be amended accordingly.</p> <p>E4[43] Partly accepted. The ten-minute walk requirement is based on the MCHLG/DoT ‘Manual for Streets’ which specifies in para 4.4.1 that ‘walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes’ (up to about 800 m) walking distance of residential areas which residents may access comfortably on foot’. It encourages ‘a reduction in the need to travel by car through the creation of mixed-use neighbourhoods with interconnected street patterns, where daily needs are within walking distance of most residents’. However, it clearly should not apply in the case of agricultural dwellings which need to be located near to or within the farms they serve.</p> <p>E4[44] see Policy 16 comments above. E4[45] Partly accepted. This part of Policy 26 is not intended to suggest that existing PROW or any other routes should be surfaced, but that they should be accessible to people with a disability in accordance with the Equality Act 2010. The implication of the Act is that rights of way provision for disabled people has to be considered equally with that of other visitors. The principle of ‘Least Restrictive Access’, which requires that all structures erected on rights of way must meet the highest possible standards and will benefit all users not only those with restricted mobility, might be usefully referenced.</p>

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	<p>Part d is worded to suggest that any existing PROWS on sites should be resurfaced to facilitate use for wheelchair users? Is that the intention of the policy? The Council's PROW team should be consulted on this E4[45].</p>	<p>Therefore it may be better included in Policy 27. AMEND POLICY TO REFER TO AGRICULTURAL DWELLINGS AS AN EXCEPTION, AND THAT IMPACT ON FOOTPATHS SHOULD BE MINIMAL.</p>
<p>Policy 27: Footpaths, Bridleways and Quiet Lanes</p>	<p>Support C38[21]: improve the surface of bridleway to Liskeard to allow people to safely ride on a bike to tow, keep the bridleway between St Cleer and Liskeard, across St Cleer Downs, more open and improve it to encourage bicycles?</p> <p>The wording of the policy doesn't make sense. It suggests development which results in the closure of public paths should project the existing rights of way network. If the path requires closure because of development, it is not protecting the existing rights of way network. MAP 7 shows a new quiet lane. What is meant by this – there is no reference within Policy 27 of new quiet lanes? E4[18]</p>	<p>C38[21]: Support noted. E4[18] Partly accepted. AMEND POLICY TO PROVIDE CLARITY AND INCORPORATE PROVISIONS FOR DEVELOPMENT IMPACTS TRANSFERRED FROM POLICY 26.</p>

Appendix 1.

<p>Alternative Housing Sites Suggested</p>	<p>Land Adjacent To Penhale Meadow St Cleer Cornwall. D1[3]</p> <p>This site was recommended for approval by the Planning Officer in Wain homes' 2015 application (Ref: PA15/05975). The site controlled by Wain homes is immediately adjacent to St Cleer and provides easy pedestrian and cyclist connections to the site and the settlements services, thus reducing local dependency on private vehicles to access local services [Policy 1, 2,12 and 13, CLP, Policy 26, St Cleer Draft NP]. If the development were to be allocated and developed, the finished area would blend into the established</p>
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built form of St Cleer.

The proposal has the ability to provide a local shop/café, which is supported by Country Lane Foods (the same operator of the previous local shop in St Cleer) [Policy 2 and 13, CLP; Policy 20, St Cleer Draft NP]; as well as the opportunity to provide accessible bungalows, which could be age restricted, to provide for elder residents in the parish. Wain homes also have a proven record of providing on affordable housing and \$106 contributions [Policy 2 & 8, CLP]. With the additional benefits the land poses for providing a local shop/café and accessible bungalows on top of the 2015 recommendations for approval, the positives from developing the site significantly weigh against the negatives.

There is nothing fixed about what Wain homes could provide for the parish. As such, housing numbers, accessible (age-restricted) homes, shop/café, and other aspects of the development is able to flex to the required needs of the parish. For the purposes of these representations I have used the 70 dwelling figure as this is the amount the Draft Neighbourhood Plan has stated is required from a larger site. However, if more affordable housing is deemed to be required then the Wainhomes site can flex to fit this need.

The company understand that in a previous application submitted in the same year as the Horizon Farm Outline Application (2015) there were objections pertaining to the capacity of the local primary school, vehicle traffic increasing on the surrounding roads, and the value of the land as a green field (comments attached to app Ref: PA15/00073/PREAPP). It was the opinion of the Planning Officer

that these issues could be mitigated through securing a S106 agreement; however, the committee retained their view to refuse. When compared to a development coming forward at Horizon Farm the capacity of the local Primary School would be assisted more through a Wain homes development with the security found in a S106 contribution than the lack of a legal mechanism that was one of the reasons for Horizon Farms refusals. The amount of traffic would also be less impacted by a development at Caradon View than at Horizon Farm due to the dependency on private vehicles caused by the isolated location of the farm site. The value of the site as a green field is always a complex issue and must be debated on the balance of benefit. By providing the housing requirement stated in the draft Neighbourhood Plan in a sustainable location, while also providing the opportunity for St Cleer to regain a local shop and providing a maintained and enhanced green space, I believe that the benefits of the development go a substantial way towards balancing the benefits with the ecological value of the pasture land.

The issues raised by Cornwall Council and the Planning Inspectorate have shown that the site at Horizon Farm would contradict a range of NPPF policy pertaining the sites sustainability, and the additional costs involved in bringing the site forward for development question the sites viability. In the past a previous application for the Wain homes site was supported by Cornwall Council but was opposed by locals. However, in light of: the comparison with Horizon Farm, the land's inclusion in multiple SHLAAs, the community benefits that could be provided for local residents, the land off Caradon view is a considerably more sustainable, suitable and deliverable. As it has been stated previously, any housing numbers and the type of housing for any future development on the Wain homes site is not fixed. Wain homes have a proven record, in Cornwall and the South West Region generally, of housing delivery. The deliverability of Horizon Farm is questionable therefore sufficient measures should be identified in order to future-proof the NP and the controlled growth of St Cleer. The company would welcome the opportunity to work alongside the parish to establish the requirements of residents and how these requirements can be met through development.

Appendix 2

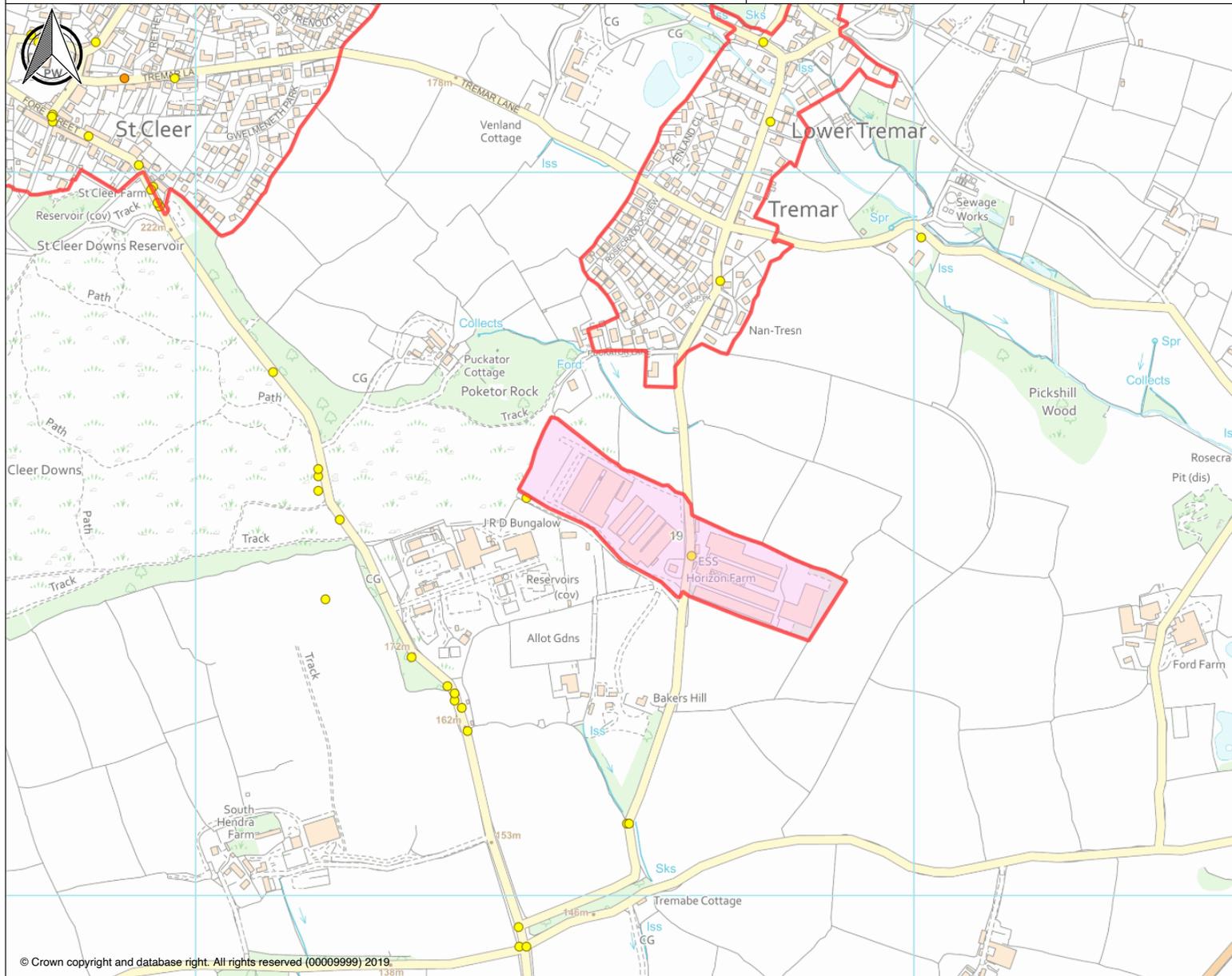
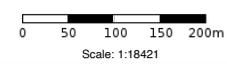
Traffic Collisions

Source: DoT

St. Cleer CP

Author: L. Administrator

Date: 27/10/2019



Policy 1 Settlement Development Boundary



Policy 22 Horizon Farm



Stats19 Accidents - 2010s

- 1
- 2
- 3

Stats19 Accidents - 2000s

- 1
- 2
- 3

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