

## Ludgvan Parish Neighbourhood Plan – Response by the Plan Steering Group to Comments and Questions from the Examiner

No.	Examiner’s Comments and Questions – October 2019	Response from the Steering Group
4	<p>Regulation 16 Comments</p> <p>Firstly, I have already offered the Parish Council the opportunity to respond the comments made in the representations submitted at the Regulation 16 stage.</p>	<p>It is noted that some of the questions asked by the Examiner address matters raised in the representations and comments received during the Reg. 16 Consultation. We may have dealt with these matters satisfactorily in our answers in this Schedule however, for the sake of completeness, we have also provided direct observations on the Reg. 16 representations in Appendix B (below).</p>
5	<p>In addition, I would invite Cornwall Council’s response to the representations from Natural England, dated 26<sup>th</sup> September 2019, which suggests that there should be an Appropriate Assessment undertaken, for the areas of Long Rock which are included in the settlement boundary, but are outside the Site Allocations area which was covered by the Local Plan’s Appropriate Assessment for Site PZ – E4. I note that the HRA screening report refers to <i>“there are no areas of land within the development boundary at Long Rock which are not covered either by greenspace designations or the Site Allocation DPD”</i>. That does not appear to me to be factually correct as the Natural England letter refers to land and buildings opposite the allocation sites, which are included in the settlement boundary.</p>	<p>Whilst Cornwall Council have been asked to comment on this, it seems that the correspondence from Natural England may be perpetuating a confusion about matters relating to the settlement area boundary for Long Rock that we thought had been dealt with.</p> <p>In its response to the draft SEA Screening Opinion on the 13<sup>th</sup> February 2019, NE wrote <i>“We note that the development boundary as shown includes further land, in addition to the allocation sites, which means that likely significant effects cannot be ruled out owing to this land’s close proximity to the Marazion Marsh SPA.”</i></p> <p>This concern was drawn to the attention of the Steering Group and discussions between CC and NE on this matter took place during February 2019. On 27<sup>th</sup> February 2019 we were informed by CC that the issue <i>“was the potential for development within the development boundary, which is outside of the DPD site allocations.... two of the sites are, in any case, designated as open green space – areas 3 and 5 on map 5 in your NDP. The only other open area.... is the extreme eastern tip of the development boundary, adjacent to the roundabout, which extends beyond the DPD employment allocation”</i>.</p> <p>This latter site, a small triangle of land had been included in the proposed settlement area boundary because of the existence of a small depot building on it. However, because of NE’s concerns and as it was not included within the boundary of the strategic allocation site referred to by Policy PZ-E4 Long Rock East in Cornwall Council’s site allocation DPD, it was agreed by the Steering Group to amend the proposed settlement boundary for Long Rock and exclude the said site. It was noted at the time that the site was indicated as being part of the green infrastructure in fig. PZ24 on page 80 of Cornwall Council’s response to the Inspector conducting the examination of the Cornwall Site Allocations Document.</p> <p><a href="https://www.cornwall.gov.uk/media/33629356/ccs10-insps14-council-response-penzance.pdf">https://www.cornwall.gov.uk/media/33629356/ccs10-insps14-council-response-penzance.pdf</a>).</p> <p>A SEA/HRA screening opinion was issued on the Pre-submission Version of Ludgvan Neighbourhood Plan, which included an amended settlement area boundary for Long Rock. We were informed by letter dated 7<sup>th</sup> March 2019 that, in the opinion of Cornwall Council, a SEA and HRA were not required.</p>

		<p>The Pre-Submission Version of the Plan was made subject to Regulation 14 consultation from 1st April to the 13th May 2019.</p> <p>In its response to the Pre-submission Version of the NP received on 8<sup>th</sup> May 2019 NE once again asserted that <i>“We understand that the site newly allocated in the Allocations DPD, to the east of Long Rock, is included within the new development boundary <b>but you have also included an area that is not allocated</b>, close to the SPA. We have not seen any evidence about the impact that this may have on the protected features of the SPA and we advise that you either amend the boundary or undertake a Habitats Regulations Assessment.”</i></p> <p>The follow-up to this comment was to submit the Neighbourhood Plan, as revised following the Reg. 14 consultation, for a further SEA/HRA screening. The previous opinion (of the 7<sup>th</sup> March 2019) was re-affirmed by Cornwall Council on 13<sup>th</sup> June 2019.</p> <p>A copy of all the email correspondence between the Steering Group and Cornwall Council including emails of February 2019 on this matter can be provided, if required.</p>
6	<p>I note that Cornwall Council’s screening letter dated 7th March 2019, referred to the request for Natural England to confirm whether or not HRA was required. Can I be provided with a copy of the response Cornwall Council received from Natural England, along with confirmation as to whether the settlement boundary has changed since that letter.</p>	<p>This is a part of a matter, related to the response to point 5 above, for Cornwall Council to reply to. Ludgvan Parish Council was copied in to email correspondence between Natural England and Cornwall Council on the 7<sup>th</sup> March 2019, in which Cornwall Council had confirmed that a triangle of land had been excluded from the settlement area boundary and <i>“on that basis I’m going to issue the screening decision that SEA and HRA are not required”</i>. Natural England replied <i>“so the undeveloped land to the west of the allocation is designated greenspace? Why on earth would they want that within the development boundary if it is on the edge of the settlement? Safest to keep it out I would have thought. But if designated then not our concern. Rest sounds fine.”</i></p> <p>A copy of all the correspondence shared with the Steering Group by Cornwall Council on this matter can be provided, if required.</p>
	Policy LUD1 Protecting the Natural Environment	
7	<p>I invite the Parish Council to revisit the wording of the first sentence of this policy as it appears that the final part, <i>“may be supported”</i> is superfluous.</p>	<p>We would have no objection if the Examiner recommends that Policy LUD1 should be re-worded as follows: <i>“Development proposals will be expected to have no adverse effect on the integrity or continuity of landscape features and habitats of local and national importance for wild flora and fauna. Proposals which incorporate conservation and/or appropriate habitat enhancement to improve biodiversity may be supported.”</i></p>
	Policy LUD 4 Coastal Change Management Area	
8	<p>8. I consider that it is important that decision makers know whether a site lies within the Coastal Change Management Area. Can I be provided with a plan showing the extent of the area where this policy applies which can then be inserted into the plan?</p>	<p>In response the Reg. 14 consultation, we were invited by Cornwall Council to include a policy relating to the Coastal Change Management Area. Having agreed to do so, we requested a map on the 13<sup>th</sup> May 2019 that showed its extent within the neighbourhood area. We were informed that no such map existed. <i>“It is not obvious</i></p>

		<p><i>from the documents that there is a 'land-side boundary' and I am not aware of one", we were told by the Neighbourhood Plan Officer for the LPA on the 14<sup>th</sup> May 2019. On the 28<sup>th</sup> May 2019 an email was sent to Cornwall Council that shared the proposed draft policy with them and stated "The new policy is not accompanied by a map that defines the area however it was recognised that, in policy terms, <b>we should avoid overlap and potential conflict with the defined settlement area for Long Rock.</b> It was agreed by the Steering Group that we should seek Cornwall Council's advice on the most appropriate southern boundary line for the Long Rock settlement area."</i></p> <p><i>On the same day we received a reply from the Flood &amp; Coastal Strategic Resilience Lead that "the southern boundary of the settlement area should be drawn to the northern side of the railway line and not encroach on the beach to the south."</i></p> <p><i>The Neighbourhood Plan Officer for the LPA also told us by email on the 30<sup>th</sup> May 2019, "It would make sense to draw the line tight against the railway line as we wouldn't wish to allow development to the south of the line."</i></p> <p><i>A copy of all the correspondence between the Steering Group and Cornwall Council on the policy content and the area it covers can be provided, if required.</i></p>
	Policy LUD5 Heritage Assets	
9	<p>Can the Parish Council confirm whether the Schedule of Local Heritage Value has been produced? I do not consider that a decision of the Parish Council to include a building in its list would confer a status as a non-designated heritage asset. That could have been done by the inclusion of the building in the neighbourhood plan supported by evidence of its significance.</p> <p>Does Cornwall Council have a view on this?</p>	<p>The principal of establishing a Schedule of Local Heritage Value has been accepted by the Parish Council but the consultation and work necessary to produce one has not yet been undertaken. Our effort currently is the preparation of a Design Statement. This is currently in an advanced draft stage and will shortly be the subject of a community consultation. It was thought inappropriate to carry out several consultations in parallel or one after another.</p> <p>In preparing the Schedule of Local Heritage Value we intend to follow the guidance provided by Historic England in Advice Note No. 7 Local Heritage Listing. We shall work with Cornwall Council and establish an appropriate nomination process, selection criteria and approval procedure for inclusion on the local list.</p> <p>Policy LUD5 has significance because it recognises that there are local undesignated heritage assets. These are a matter of interest to the community and the Parish Council is committed to maintaining a local list.</p> <p>The Design Statement will provide specific guidance to owners and potential developers that will reflect the requirement of the NPPF para. 197 to balance the consideration of the scale of any harm or loss with the significance of the heritage asset.</p>
	Policy LUD7 Settlement Area Boundaries	
12	<p>Can I be provided with a copy of the settlement boundary criteria, that was used by the Parish Council when the boundary was being drawn up, as the online linkage is not currently available. I am particularly interested in the reason for the inclusion of the</p>	<p>The criteria used to draw up the settlement boundaries is provided in Appendix A in this document.</p> <p>The allotments were included because they we consider them to be an important local community resource for Long Rock and need to be recognised as such, just like other community and recreation areas. Including them in the settlement area</p>

	allotments, which does not seem to be part of the built form of the settlement of Long Rock.	boundary will ensure the land is regarded throughout the plan period as a local community asset.
13	Should the neighbourhood plan include a policy to specify a minimum figure for meeting the housing needs for the area, as set out in the plan, namely the 56-unit figure, provided by Cornwall Council, and should that be explicit in excluding housing delivery in Long Rock, which is viewed as part of the wider Penzance area?	<p>We have taken the position that it would be wrong to set a numeric limit on the scale of housing development because this may be seen as being overly prescriptive and potentially preventing otherwise acceptable development and the meeting of identifiable local housing needs.</p> <p>As a means of futureproofing the Plan, Policy LUD7 promotes sustainable development within the defined settlement areas and is tolerant, in principle, of small-scale development adjacent to that boundary.</p> <p>Para. 8.23 makes it plain that <i>“land and buildings outside of the boundary lines is considered to be countryside where policy LUD1 normally applies. Any development proposal should be a well-related and logical extension of the existing settlement area, minor in scale, in line with the guidance of the Ludgvan Design Statement and does not compromise local landscape character.”</i></p>
	<b>Policy LUD8 Development in the Countryside</b>	
14	What would be the presumption be in respect of conversion of buildings outside of a settlement area. Similarly, how would the policy relate to proposals for domestic extensions, outside of the settlement boundaries?	<p>Policy LUD8 specifically addresses development proposals within the several small settlement areas in the Parish that are not subject to policy LUD7.</p> <p>Policy LUD8 seeks to establish what will and will not be supported within the built form of the settlement.</p> <p>Development proposals for the conversion or extension of isolated buildings in the countryside are a matter for the local planning authority and subject to other policies in the development plan, in particular, Policy 7 of the Cornwall Local Plan.</p>
	<b>Policy LUD10 Open Space</b>	
15	As I read this policy, it has two aims to protect natural features on a site and secondly for the scheme to incorporate soft landscaping. However, the policy title and para 8.31 refer to the provision of open space within developments. Should that be set out in the policy or is the intention to rely upon Local Plan open space expectations set out in Policy 25 in which case the title of the policy could be amended?	<p>Following representations by the local planning authority the policy was reduced in scope. We were advised to <i>“avoid amenity space/POS requirements, as this is covered by Policy 13 of the Cornwall Local Plan. Perhaps it could be reworded as follows: Development proposals should, where reasonable and practicable, protect existing natural features on the site and incorporate a suitable scheme of soft landscaping, which complements local character and enhances biodiversity.”</i></p> <p>A change of title would be acceptable. Could we suggest that it be amended to: ‘Landscaping on Local Development Sites’?</p>
	<b>Policy LUD11 Local Housing Needs</b>	
16	Is the intention that the policy only requires affordable housing on schemes of more than 10 units or should the wording reflect the requirements of smaller schemes to make a financial contribution to affordable housing?	<p>It is the intention of policy LUD11 that schemes of 10 or more dwellings should deliver an appropriate level and relevant mix of affordable homes.</p> <p>Any obligation for a financial contribution from smaller schemes is outside the scope of the policy and something for the local planning authority to deal with.</p>
17	What is meant by <i>“give priority to local households”</i> Is it restricted to residents with links to that settlement, Ludgvan Parish or the wider Penzance, Hayle, Marazion area? Could Cornwall Council advise whether such a policy could apply to dwellings for sale at a	<p>In recognition that most of the new housing development in the neighbourhood area in the next few years will emanate from development within the Long Rock strategic development area, Policy LUD11, of necessity, must prioritise the needs of Penzance/Newlyn area as referred to in para. 9.8.</p>

	discount or starter homes where there is an income threshold as set out in the glossary to the NPPF as constituting affordable housing. I note that the development on the strategic site at Long Rock will be contributing to meeting wider strategic housing needs.	
	Policy LUD 12 Second Homes	
18	Neighbourhood Plan policies must be based on evidence. I note that others in their Reg 16 comments, have raised concern that this policy is not based on evidence of the harm that second homes impose on the area, whether it is be through the high numbers of second homes in a settlement affecting the viability of local services or the effect of second homes on market prices. I note that the local resident's concerns are expressed in terms of the possibility of new houses being used as second homes. In the absence of evidence of existing harm, I am minded to recommend the deletion of the policy, but I am offering the Parish Council the final opportunity to make representations on this point.	<p>Prevention is better than having to deal with something incurable. The viability and sustainability of the community of Long Rock is a fragile thing. It will be difficult enough to integrate many new permanent residents, even though many will come from the local housing area.</p> <p>Allowing open-market houses to be snapped up as second-homes or holiday-lets could be disastrous. It is certainly something that is feared by community representatives.</p> <p>A recent survey by the Estate Agents Hamptons, on behalf of the Telegraph, has revealed that, in Padstow, 67% of recent property sales were for second homes, whilst other areas such as St Ives (24%) and Rame (29%) with equally depressing figures (in terms of damage to the local community). Overall the survey showed that in 2018 second homes accounted for 10% of all house sales in Cornwall, up from 7% in 2010 showing a depressing growing trend. Whilst no policy would be able to regulate the re-sale of existing properties as non-primary residencies, we do feel that restricting the sale of new properties in the Parish to Primary Residency would help to maintain viable communities.</p> <p>Also, more locally, we have witnessed what has happened over the past few years to Mousehole. A predominance of second homes has all but destroyed the community, with the few remaining full-time residents being surrounded by empty properties out of season. We do not want to see Long Rock destroyed in the same way.</p> <p>Long Rock is an internationally known location. We have little doubt that new development in this very special and unique environment will appeal to many from up-country and further afield who seek a holiday dwelling. The fact that the houses are new, rather than one of the declining number of available older, character properties, is of little relevance when you have such a stunning landscape on your doorstep.</p>

## Appendix A

### Defining a Settlement/Built-Up Area Boundary

It is important that the boundary should take account of development and commitments that have occurred since the previous boundary was set. It should also include sites that are allocated in development plans (unless they are detached from the settlements and designated as exception sites).

The basic approach to defining the settlement area is illustrated by a set of draft principles below. Consistency is the key. The principles once agreed will need to be applied consistently when defining settlement boundaries and where judgements are made these will need to be noted.

#### Principle 1:

The boundary will be **drawn tightly** around the built-up areas and, where possible, will follow defined features such as walls, hedgerows, paths and roads and other lines of communications that are likely to have a degree of permanence.

#### Principle 2:

##### **Boundaries will include:**

- a. Buildings and associated land that make up the settlement area, including recent new development
- b. Existing commitments for built development i.e. unimplemented planning permissions (unless there is real doubt that they will be implementable within the plan period)
- c. Buildings on the edge of settlements which relate closely to the economic or social function of the settlement e.g. churches, community halls etc
- d. Important amenity areas which form part of the character of the settlement
- e. Curtilages which are contained and visually separated from the open countryside and are clearly part of a network of buildings that form part of the built-up area
- f. Site allocations in the LP or NP – but not those subject to an exception site policy
- g. The entire part of a dwelling and attached outbuildings, but not necessarily those that are physically separate

#### Principle 3:

##### **Boundaries will exclude:**

- a. Important gaps
- b. Playing fields or open space at the edge of settlements (unless such open spaces are surrounded by the built-up area of the settlement and they are to be to be designated as open space to protect them from development)
- c. New allocations for affordable housing
- d. Isolated development, or individual groups of dwellings, or areas of business/employment, which are physically or visually detached from the settlement (
- e. Farm buildings or agricultural buildings on the edge of the settlement which relate more to the countryside than the settlement
- f. Large gardens and other open areas which are visually open and relate to the open countryside rather than the settlement
- g. Large gardens or other areas whose inclusion or possible development would harm the structure, form and character of the settlement
- h. Camping and caravan sites unless in year-round permanent residential use
- i. Agriculture, forestry, equestrian development, minerals extraction, landfill, water features, public utilities (sewage treatment plants, substations)

#### Principle 4:

Boundaries do not need to be continuous. It may be appropriate given the nature and form of a settlement to define two or more separate elements.

#### Principle 5:

Property ownership boundaries should not form the basis for defining the built-up area. The key is, the visual openness of the land and whether it relates best to the built-up area or countryside.

## Ludgvan Parish Neighbourhood Plan

## Regulation 16 Comments and Observations

Reg.16 Respondent	Substance of Response	NP Steering Group Observations
Savills for the Truro Diocesan Board of Finance	<p>The Diocese is generally supportive of the objectives set out in the Ludgvan NDP but would like to take this opportunity to make the following comments. Policies not listed are where the Diocese has no specific comments.</p> <p>Policy No. LUD1 Protecting the Natural Environment As a general point, the Diocese supports the aspiration in the NDP to protect and enhance the parish’s landscape, habitats and biodiversity.</p> <p>Policy No. LUD2 Wildlife Corridors The Diocese supports the aspiration in the NDP to protect and/or enhance wildlife opportunities within developments.</p> <p>Policy No. LUD5 Heritage Assets The Diocese supports the aspiration in the NDP to recognise and protect heritage assets.</p> <p>Policy No. LUD6 Local Green Space The Diocese notes the findings of the Green Spaces Assessment Report, and that the various designations in the NDP do not cover land within the ownership of the Diocese.</p> <p>Policy No. LUD7 Settlement Area Boundaries The Diocese welcomes the additional information and clarity providing in the paragraphs and footnotes that accompany this policy; something that it raised in previous consultation responses. The Diocese considers that the Parish has adopted a sensible and pragmatic growth strategy.</p> <p>Policy No. LUD8 Development in the Countryside Essentially the same comment as for LUD7 above, and the Diocese welcomes the clarity contained within the policy wording.</p> <p>Policy No. LUD9 Sensitive Design and Sustainable Development The Diocese has its own sustainability policies and therefore is supportive of the aspiration within the NDP for new development to be environmental sustainability measures. The words ‘where practical, viable and visually acceptable’ are an important and pragmatic caveat, which is supported.</p> <p>Policy No. LUD11 Local Housing Need The Diocese notes the point about the housing allocation at Long Rock and the delivery of affordable housing in that location, but supports the recognition of the need for affordable housing to be developed elsewhere in the parish, subject to an assessment of local housing need. The ‘rural exception site’ model can sometimes be prescriptive, and viability is typically an issue, but the approach being taken in the submitted NDP appears to be more flexible and this is supported.</p> <p>Policy No. LUD12 Second Homes The Diocese notes the aspiration in the NDP to restrict the occupancy of new open market housing to “Principal Residences”, and the community support for such a policy. It is understood that some NDP steering groups have had difficulties in presenting a strong enough case to</p>	<p>It is noted that the Diocese has expressed specific support for five of the policies in the NP and, for two other policies, has gone as far as remarking that it “welcomes the additional information and clarity” in the Submission Version of the Plan on matters it raised during the Reg.14 consultation.</p> <p>The Diocese continues to query the strength of the case for the policy that restricts the occupancy of new open market housing to ‘Principal Residences’. We have addressed this matter further in our Response to the Examiner’s Comments and Questions (see point 18). We would argue the concerns and views of the community on this matter should take precedence over the aspirations of land and property owners.</p>

	<p>examiners to demonstrate that the second home restriction is necessary; as such it is advised that reassurance is sought regarding the likelihood of this policy being considered robust in the longer term. The NDP examiner may be able to provide more clarity on this in due course.</p> <p>Policy No. LUD16 Community Horticulture</p> <p>Paragraph 10.20 identifies the allotment site at Church Hill, which is on glebe land. The Diocese notes the importance that the NDP places upon the allotment site as a community facility and that the demand for allotments is greater than the supply.</p> <p>Summary</p> <p>For the reasons identified above, the Diocese requests that Cornwall Council considers the comments made in this letter in its review of the NDP. Thank you for the opportunity to review the submitted NDP and the Diocese would like to be kept informed of future opportunities to participate in consultation.</p>	
<p>Natural England</p>	<p>We recognise the hard work that goes into preparing a neighbourhood plan and we welcome the progression of the Ludgvan Neighbourhood Plan.</p> <p>We would like to make the following comments:</p> <p>The proposed new Longrock development boundary runs very closely to the internationally designated Marazion Marsh SPA. We understand that the site newly allocated in the Allocations DPD, to the east of Longrock, is included within the new development boundary which was subject to an Appropriate Assessment and allocation policy PZ-E4 Long Rock East includes policy criteria to mitigate against likely significant effects on the nearby SPA. You have however also included within the boundary an area to the south and the west of the allocation site that was not subject to the Appropriate Assessment, close to the SPA. We have not seen any evidence about the impact that the presumption for development in these locations may have on the protected features of the SPA and we advise that you either amend the boundary or undertake a Habitats Regulations Assessment. The Appropriate Assessment for Allocation site PZ-E4 should provide a ready template for the latter option.</p> <p>We note that the parts of the beach have now been taken out of the development boundary, which we welcome. We are however unclear why the railway line is still within the development boundary, whilst for instance the A30 is not within the boundary. The railway line is very close to the waterfront on a coast subject to change. We recommend that you review this position.</p> <p>We welcome the inclusion of the Coastal Change Management policy in the neighbourhood plan. It would be very helpful to all users of the plan to show within the plan where the coastal change management area extends to. The plan clarifies that:</p> <p>* The CCMA extent is defined by the latest and current Cornwall Coastal Vulnerability Map (CCVM) held and applied by Cornwall Council as the Coast Protection Authority. This map shows a minimum width of CCMA of 10m landward from the current coastal erosion line as shown on the CCVM.</p> <p>As the width is variable and the map is only to be found on-line elsewhere, we hold that the extent of the area should be shown on a plan proposals map.</p>	<p>The settlement area boundary has been amended in line with previous comments including those from Natural England. The boundary of Long Rock to the south and west has not changed since the Regulation 14 version. Cornwall Council carried out a SEA/HRA screening opinion on both the Pre-Submission and Submission versions of the Plan, in consultation with Natural England and other agencies. On both occasions we were informed that a HRA was not required, not even for land to the south and west of the allocation. Indeed, Natural England seems to have accepted that, as the site to the west of the allocated site was designated greenspace, it was not of concern to it.</p> <p>Following Natural England's comments on the Pre-Submission Version of the Plan, the boundary line of the Long Rock settlement area to the south, that included part of the railway line and apparatus, was the subject of discussions with the local planning authority regarding the extent of the CCMA boundary.</p> <p>The matter of a CCMA boundary map is one that has been discussed with the local planning authority. As the Cornwall Coastal Vulnerability Map online is imprecise and could lead to misinterpretation it was thought best not to include such a map but include a footnote to the policy regarding the 'minimum width.</p>
<p>CC Affordable Housing</p>	<p>LUD07 The affordable housing team have concerns with Policies LUD07 &amp; 08 and the unintended consequences of this policy statement. Ludgvan is in a Designated Rural Area, therefore schemes delivering between 1-9 units will only provide an offsite contribution to</p>	<p>As regards the point about small development not providing an off-site contribution to affordable housing, unless it is a rural exception site, this is a matter that was not raised by Cornwall Council</p>



	<p>affordable housing, unless it is a rural exception site. The plan is silent in relation to exception sites and we would recommend the Local Plan Policy 9 is reflected.</p> <p>LUD11</p> <p>The affordable housing team have concerns with Policies LUD07 &amp; 08 and the unintended consequences of this policy statement. Ludgvan is in a Designated Rural Area, therefore schemes delivering between 1-9 units will only provide an offsite contribution to affordable housing, unless it is a rural exception site. The plan is silent in relation to exception sites and we would recommend the Local Plan Policy 9 is reflected.</p>	<p>during previous consultations. If it had been, we may have considered its policy implications within the Plan.</p>
Historic England	<p>I can confirm that there are no issues associated with the Plan upon which we wish to comment.</p>	<p>We note that Historic England continues to have “no issues” with the Plan.</p>
Wood E&I Solutions UK Ltd on behalf of the 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.</p> <p>National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.</p> <p>Electricity Distribution</p> <p>The electricity distribution operator in Cornwall Council is Western Power Distribution.</p> <p>Information regarding the transmission and distribution network can be found at:</p>	<p>The comment repeats what were told during the Reg.14 consultation.</p>
Highways England	<p>In general terms we are satisfied that the plans proposed policies are unlikely to lead to development which will adversely impact the trunk road. We have noted and understand the concerns at the impact of the A30 on the communities through which it passes, and have noted in particular references at para 8.4 and 11.9 to the local aspiration for a bypass. We are generally supportive of the Transport and Travel policies LUD18-22, particularly those which will support sustainable travel improvements and encourage new development to appropriately assesses and mitigate traffic impact. Highways England will expect any large-scale proposals which have the potential to impact on the operation of the A30 to be supported by a transport assessment and if necessary mitigation measures in line with the requirements of DfT Circular 02/2013 The Strategic Road Network and the Delivery of Sustainable Development. We have also noted the references to the local plan allocations at Long Rock, which fall within the neighbourhood plan area. Highways England has worked with Cornwall Council in developing the transport evidence base to support these allocations and identify mitigation works where necessary.</p> <p>These comments do not prejudice any future responses Highways England may make on site specific applications as they come forward through the planning process, and which will be considered by us on their merits under the prevailing policy at the time.</p>	<p>We are pleased that Highways England notes and understands the concerns we have regarding the continued harmful impact of the A30.</p>
South West Water	<p>.. content noted and upon which we have no comments.</p>	<p>We note that South West Water has no specific comments to make on the Neighbourhood Plan.</p>
Cornwall Council Principal Public Space Officer (Open Space)	<p>Thank you for consulting the Public Space Team. The National Planning Policy Framework updated 2018 (para 96) requires that planning policies should be based on robust &amp; 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 pending the adoption of the Local Plan. It will now be taken forward as an evidence base for a Supplementary Planning Document (SPD). The Penzance area study, which was refreshed in 2017, included Long Rock, but it has not been done</p>	<p>Cornwall Council has now taken the opportunity to provide this statement to the Examiner although its’ views have not been shared with us during previous consultations with the local planning authority on the Plan, either informal or formal.</p>

	<p>in the remainder of Parish of Ludgvan. The same methodology should be used throughout the county, to ensure consistency and enable comparison. Details of the adopted methodology and standards, which form part of the Open Space for Larger Towns in Cornwall can be found at: <a href="http://www.cornwall.gov.uk/environment-and-planning/parks-and-open-spaces/open-space-strategy-standards">http://www.cornwall.gov.uk/environment-and-planning/parks-and-open-spaces/open-space-strategy-standards</a>.</p> <p>The NDP includes a Local Green Space report, which although it provides a very thorough basis for the protection of a number of spaces, it provides no direction to what may be required in the future, what deficiencies there may be now or how the needs of future generations might need to be addressed. There is also no evaluation of function, quantity (per person), accessibility or quality, which would allow comparison with other similar parishes, as well as identify deficiencies, evidence the need to protect sites and to help prioritise improvements. Without this type of open space assessment there are only future standards for Long Rock, based on the wider Penzance area. Consequently, it is not clear what might be needed in other settlements - Ludgvan &amp; Crowlas.</p>	<p>As we have demonstrated on the matter of the CCMA, we have been prepared to accommodate the suggestions of Cornwall Council whenever possible. It is not clear what Cornwall Council is expecting at this late stage, however.</p> <p>We have included policies in the NP that protect existing open space and recreation areas and support new recreation and sports facilities commensurate with local need.</p> <p>We have made clear in para. 10.17 in the Plan that <i>“the Parish Council will work closely with the local planning authority and other appropriate bodies to maintain a robust and up-to-date assessment of the local needs for open space, sports and recreation facilities and opportunities for new provision taking into account the latest levels and standards of provision”</i>.</p> <p>Regarding policy LUD06, it is a policy that seeks to protect existing local green areas from development in accordance with the NPPF (para. 99). Their future use is beyond the scope of the policy but certainly a matter of interest to the Parish Council going forward.</p>
<p>Devon &amp; Cornwall Police Architectural Liaison Officer</p>	<p>Thank you on behalf of Devon and Cornwall Police for the opportunity to comment on this application. I note and welcome the comments regarding designing out crime etc within the NDP I therefore have no further comment to make at this time.</p>	<p>The respondent welcomes the comments in the Plan <i>“regarding designing out crime etc”</i>. Policy LUD08 was amended as a result of comments made by the respondent during Reg. 14 consultation.</p>