

Appendix 15

Pre-submission consultation (Regulation 14) Formal Consultee Responses

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

Organisation	Comment	Reply
Cornwall Council as per Schedule 1 Regulation 3 Consultation Bodies for Neighbouring Planning – (a)		
Cornwall Council Neighbourhood Planning Team	<p><u>Community Infrastructure Levy (CIL) Officer</u></p> <p>Landulph Parish is in CIL Charging Zone 2. As a rural parish, this means housing developments of 1-5 dwellings will be charged at £200 per sqm, and housing developments of 6 and above will be charged at £100 per sqm.</p> <p>CIL is expected to be adopted at Full Council on 10 July, and will come into effect from 1 January 2019. After this date, all new planning applications could potentially be charged CIL.</p> <p>Affordable housing is exempt from CIL, and self-build developments can also apply for exemption. A proportion of the CIL generated from any liable development will be given to the Parish Council – 15% of CIL generated, or 25%</p>	Discussed and noted.

	<p>where there is an adopted Neighbourhood Development Plan.</p> <p>Communities may be able to secure more CIL funding than this. Discussions on CIL governance and spend are currently underway, and the outcome of this will determine how the remaining proportion of CIL money will be distributed. The Council will be contacting Town and Parish Councils about this over the next couple of months, but information will also be made available at www.cornwall.gov.uk/cil.</p> <p><u>Comments below have been compiled by Cornwall Council's Neighbourhood Plans Team. We hope these comments are useful.</u></p> <ol style="list-style-type: none"> 1. Maps proposed in Appendix G may be more useful to include as an Appendix (which I think would be Appendix A). 2. Table 1 – for info, new figures for 2017/18 will be available over the next couple of months. You may want to update the stats in your NDP accordingly once these are available. 3. 7.3 – As previously discussed, having a threshold of 5 dwellings will limit the 	<p>This has been done.</p> <p>Requested 31.07.18.</p> <p>Discussed and noted.</p>
--	---	---

	<p>provision of affordable housing (refer to Local Plan: Strategic Policies (LP:SP), Policy 8).</p> <p>The references to the appendices and the presentation of these are confusing; they are presented separate from the main document and references to these in the document are inconsistent. Recommend that this is reviewed before submission.</p> <p><u>Landscape Architect Officer</u></p> <p>1. General comments;</p> <p>It is encouraging to see aspirations relating to the conservation of the unspoilt rural character of Landulph Parish but it is recommended that the Plan strengthens the discussion on landscape/environmental issues and environmental policies as the unspoilt nature of the parish, its local distinctiveness and sense of place is derived from Landscape Character:</p> <p>1. Section 2.3 states that one of the strong outcomes of the various consultations has highlighted the key priorities of;</p>	<p>This has been reviewed. We were advised by CC to separate out the Appendix and Evidence Base from the Plan.</p>
--	---	--

	<ul style="list-style-type: none"> • <i>Delivering high quality housing in Landulph Parish, in keeping with the essential <u>rural character</u> of the Parish, with no large-scale (i.e. greater than five) developments.</i> It would be beneficial to provide evidence on this ‘<i>rural character</i>’ what elements/factors contribute here? An exploration of Landscape Character could be helpful to support this. Is there evidence which supports the number of houses which are considered appropriate? • <i>New development should be <u>small scale</u> and <u>complement its surroundings</u>. In accordance with the policies of the Tamar Valley Management Plan (MP) and Natural England.</i> As above is there evidence for what constitutes ‘<i>small scale</i>’? What evidence is provided for what ‘<i>complements its surroundings</i>’ there is subjectivity in this phrase and it is suggested that in order to have greater weight/influence on decision making the nature of appropriateness and inappropriateness of built environment needs to be explored in far greater depth; e.g. Development scale, mass, density, 	<p>Evidence for small scale can be found in Landulph views on development, November 2015 and Consultation Questionnaire, December 2016 both of which can be viewed in the Evidence Base.</p>
--	--	--

	<p>palette of materials, inclusion of open space, landscaping etc.</p> <ul style="list-style-type: none"> • <i>To conserve and enhance the natural beauty of Landulph Parish.</i> It is recommended that the evidence base is checked to ensure that sufficient recognition is given to the importance of the Environment, Landscape and Landscape Character in order to support this aspiration. • <i>It is clear that the community also wishes to protect the Waterfronts and Quaysides by having in place strict controls relating to development.</i> It is recommended that the evidence base is checked to ensure that sufficient recognition is given to the importance of the waterfront and quaysides to the quality and particular character of Landulph Parish. The particular qualities of Cargreen Conservation Area could also be presented within the evidence base. • <i>There is some support for commercial developments alongside the A388 at Elbridge. There is support for small scale business or</i> 	<p>Discussed and noted.</p> <p>Discussed and noted.</p> <p>Discussed and noted.</p>
--	---	---

	<p><i>home workers in the Parish but the impact of any expansion should be considered in tandem with the road access which is poor after turning off the A388, particularly into Cargreen.</i></p> <ul style="list-style-type: none"> • <i>There is a desire to protect facilities and amenities within the Parish.</i> <p>Although this is not part of a specific Policy perhaps in order to guide the form of development that may come forward there could be an exploration of the scale, mass and form of development that may or may not be acceptable, in line with the particular Landscape Character that is to be conserved/enhanced. For example clusters of timber framed buildings that suggest a farmstead may be considered appropriate.</p> <p>2. Landscape Character</p> <p>It is recommended that the <i>Cornwall and Isles of Scilly Landscape Character Study</i> is included in the evidence base and referenced in the text; in particular those Landscape Character Areas (LCA) found within the Parish are;</p> <p>CA26 East Cornwall and Tamar Moorland Fringe CA27 Lower Tamar and Tavy Rivers</p>	<p>Added to the Evidence Base the three Character Landscape Assessment documents that pertain to our parish - CA26, CA27 and CA29.</p>
--	--	--

	<p>CA29 Middle Tamar Valley Mention could be made of the <i>Management Guidelines</i> for each LCA as this could help to support the Landscape aspirations of the NDP.</p> <p>It is recommended that the NDP recognises that the landscape character and quality of the Parish is very important for the scenic quality of the Devon side of the Tamar and vice versa.</p> <p>3. Trees</p> <p>Perhaps consider adding mention to the contribution that trees make to the quality of the landscape within Landulph Parish (under Background 4.6?). The Ancient Tree Inventory includes a cluster of ancient trees on the northern boundary of the Parish and there are areas of Ancient Woodland within the Parish.</p> <p>Do particular tree species make a strong contribution to Landscape Character/distinctiveness etc.?</p>	<p>Discussed and noted.</p>
--	---	-----------------------------

	<p>It is recommended that a Policy is included that seeks to both protect the existing tree cover and to encourage the planting of ‘trees for the future’ as most landscapes contain an aging tree stock with limited presence of young and young-mature tree stock.</p> <p>4. Evidence Base documents could include environmental mapping which references the following (all are present or adjoin Landulph Parish);</p> <ul style="list-style-type: none"> • Area of Outstanding Natural Beauty (AONB); forms a large percentage of the parish area. • Area of Great Landscape Value (AGLV); this adjoins the Parish boundary • County Wildlife Sites • Plymouth Sound and Estuaries Special Areas for Conservation (SAC) • Tamar-Tavy Estuary SSSI heavily influences the Parish boundary adjoining the Tamar. • Ancient Tree Inventory • Ancient Woodlands • CA26 – East Cornwall and Tamar Moorland Fringe • CA27 – Lower Tamar and Tavy Rivers 	<p>All of these maps are in Appendix A, Landulph Plan web site.</p>
--	---	---

	<ul style="list-style-type: none"> • CA29 –Middle Tamar Valley • Cargreen Conservation Area • Public rights of way <p>5. Design Guidance</p> <p>It is recommended that consideration be given to the inclusion of a Design Guide, linked to Policy 1 and/or a new design policy, which includes photographs or drawings of successful and unsuccessful development/details. It should be clear what constitutes a high quality solution and what does not, including specific recommendations on things like successful small housing layouts, successful small scale commercial layouts, new Cornish hedges, wall design and materials, paving materials, parking solutions, traffic calming solutions, street furniture etc. This would help to strengthen the supporting evidence base and set of criteria against which developments can be judged to ensure that they meet the Policies. It is recommended that detailed advice could include locally present tree and hedge species; this would help to inform landscape plans submitted alongside planning applications.</p>	<p>As advised by Cornwall Council, our design guidance was removed and we adhere to the Local Plan guidance in this respect.</p>
--	---	--

	<p>Section 6.2.2 refers to ‘cherished views’ and the aspiration to protect these; it is recommended that these are documented with a caveat stating that the list is not exhaustive.</p>	
<p>Parish Councils as per Schedule 1 Regulation 3 Consultation Bodies for Neighbouring Planning – (b)</p>		
<p>Landulph Parish Council</p>	<p>I am writing on behalf of Landulph Parish Council, in response to the Landulph Neighbourhood Plan consultation.</p> <p>The draft proposed plan was discussed at length at the Landulph Parish Council meeting held on Monday 16th July 2018, and it was requested that the following points were put forward on behalf of the Parish Council.</p> <ol style="list-style-type: none"> I. The Community Infrastructure Levy is due to be implemented by Cornwall Council in January 2019, and the Parish Council has expressed concern that, by limiting the amount of properties to be developed in any one development to 5 within the parish of Landulph, could prevent the opportunity of attracting funding via the CIL. 	<p>This was discussed extensively by the steering group. The evidence from the consultations showed that the figure of 5 reflected the residents wishes.</p> <p>Landulph is in Value Zone 2: on advice from Cornwall County an increase to 6 would not guarantee the delivery of an affordable home but would give a contribution to an offsite affordable housing</p>

	<p>2. Within Cornwall Council's Local Plan Strategic Policies 2010-2030 (Policy 8: Affordable Housing) states that:</p> <p>All new housing schemes within the plan area on sites where there is a net increase of more than 10 dwellings or where dwellings would have a combined gross floorspace more than 1,000 square metres (not including replacement dwellings) must contribute towards meeting affordable housing need. In Designated Rural Areas and Areas of Outstanding Natural Beauty (which the parish of Landulph is), the threshold will be more than 5 dwellings. For developments of between 6 and 10 dwellings in such areas a financial contribution in lieu of on-site provision of affordable housing will be sought per unit of affordable housing that would have been provided.</p> <p>Whilst the Parish Council recognises that the need for affordable housing within the parish is currently very low, this could change and the Council has expressed concerns that, by limiting the amount of properties to be developed in any one development to 5 within the parish of Landulph, could prevent the opportunity of attracting this financial contribution in the future.</p>	<p>contribution, in line with higher level policies. In view of this, the group agreed to keep the maximum of 5 dwellings.</p>
--	---	--

	<p>3. In relation to points 1 and 2, the Parish Council would request that the amount of properties to be developed in any one development within the parish of Landulph is increased – to 6 properties.</p> <p>The Parish Council would like to express their gratitude to those involved with the development of the plan.</p>	
Botus Fleming	No reply	
Pillaton	No reply	
St Dominic	No reply	
Saltash TC	No reply	
Devon	No reply	
Bere Ferrers	No reply	
Callington Town Council	No reply	

Organisation	Comment	Reply
Government Bodies and Other National Agencies as per Schedule 1 Regulation 3 Consultation Bodies for Neighbouring Planning – (d-j)		
Homes and Communities Agency	No reply	
Natural England	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>We welcome the development of a Neighbourhood Plan for the Landulph parish. The parish has a rich and varied natural environment which is reflected in national and international designations for landscape and biodiversity. The parish is almost entirely within the Area of Outstanding Natural Beauty, and abuts and contains parts of the Plymouth Sound and Estuaries SAC and the Tamar Estuaries Complex SPA. The parish also encompasses a good number of Priority Habitats, including Coastal Flood Plain, Coastal Saltmarsh, Deciduous Woodland, Good Quality Semiimproved Grassland, Mudflats, Traditional Orchards and Priority Headwater Habitat.</p>	<p>Discussed and noted and added to Policy 4:</p> <p>“Development should have no adverse impact on the Plymouth Sound and Estuary SAC and Tamar Estuaries Complex SPA. See Appendix A5 for map”</p>

	<p>We would like to make the following comment:</p> <p>Policy 4 - Waterfront, Quays, Beaches, Slipways and Pathways</p> <p>We advise that you include an additional clause in this policy that development should have no adverse impact on the Plymouth Sound and Estuaries SAC and the Tamar Estuaries Complex SPA. Whilst recreational impacts from new development on the SAC and SPA are already dealt with through strategic mitigation in accordance with policy 22 of the Cornwall Local Plan, there may be other impacts that could affect the SAC and SPA – e.g. loss of habitat, pollution from run-off and particularly noisy development.</p>	
Environment Agency	No reply	
Historic England (formerly) English Heritage	<p>Thank you for your Regulation 14 Pre-Submission consultation on the Landulph Neighbourhood Plan.</p> <p>I can confirm that there are no comments on the Plan that we wish to submit other than to congratulate your community on its progress to date and to wish it well in the remaining stages involved in getting it made.</p>	
Network Rail	No reply	

<p>Highways England (formerly Highways Agency) and Highways England – Managing Agent Contractor</p>	<p>Thank you for providing Highways England with the opportunity to comment on the pre-submission draft of the Landulph Neighbourhood Plan. Highways England is responsible for operating, maintaining and improving the strategic road network (SRN) which in this instance consists of the A38 to the south of the plan area.</p> <p>We are satisfied that the proposed plan policies are unlikely to result in development which will impact on the SRN and we therefore have no specific comments to make. However, we note that the A388 runs along the western boundary of the plan area, connecting with the A38 at Carkeel roundabout which experiences congestion at peak periods. Therefore in general terms it is important that any development proposals that may come forward in the plan area which have the potential to impact on the operation of the junction, include an assessment of traffic impact and mitigation measures in line with the requirements of DfT Circular 02/2013 The Strategic Road Network and the Delivery of Sustainable Development. 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>Discussed and noted.</p>
---	---	-----------------------------

Marine Management Organisation	No reply	
Electronic Communications as per Schedule 1 Regulation 3 Consultation Bodies for Neighbouring Planning – (k)		
BT Openreach	No reply	
Three Mobile	No reply	
O2 and Vodafone Mobile	No reply	
EE mobile	No reply	
Ofcom	No reply	
Health and Utilities as per Schedule 1 Regulation 3 Consultation Bodies for Neighbouring Planning – (l)		
Royal Cornwall Hospital Trust	No reply	
Cornwall Partnership NHS Foundation Trust	No reply	
Kernow Clinical Commissioning Group	No reply	
Healthwatch Cornwall	No reply	
Plymouth Hospitals NHS Trust	No reply	

National Grid DPM Consultant Amec Foster Wheeler E&I UK	No reply	
National Grid	<p>National Grid has identified the following high voltage overhead powerlines as falling within the Neighbourhood area boundary:</p> <ul style="list-style-type: none"> • YF Route - 400kV from Landulph substation in Cornwall Unitary Authority to Langage substation in South Hams • YE Route – 400kV from Landuplh substation in Cornwall Unitary Authority to Indian Queens substation in Cornwall Unitary Authority <p>From the consultation information provided, the above overheads powerline Does not interact with any of the proposed development sites.</p> <p>Gas Distribution – Low / Medium Pressure Whilst there is no implications for National Grid Gas Distribution’s Intermediate / High Pressure apparatus, there may however be Low Pressure (LP) / Medium Pressure (MP) Gas Distribution pipes present within proposed development sites. If further information is required in relation to the Gas Distribution Network please contact plantprotection@cadentgas.com</p>	Discussed and noted.

EDF Energy	No reply	
Western Power Distribution	No reply	
Wales and West Utilities Limited	No reply	
South West Water	<p>Thank you for providing details of the above the content of which is noted.</p> <p>I would add that the level of housing suggested over the plan period would not cause any concerns although please note public foul drainage does not extend beyond Cargreen.</p>	Discussed and noted.
Others inc. per Schedule 1 Regulation 3 Consultation Bodies for Neighbouring Planning – (m to q)		
National Trust	No reply	
Campaign to Protect Rural England (CPRE)	No reply	
Cornwall Wildlife Trust	No reply	
National Farmers Union (SW)	No reply	
Cornwall Area of Outstanding Natural Beauty (AONB) Tamar Valley Area of Outstanding Natural Beauty	The Tamar Valley AONB has no further comments to make.	Discussed and noted.

Devon and Cornwall Housing Association	No reply	
Ocean Housing Cornwall	No reply	
Coastline Housing	No reply	
Westcountry Housing Association	No reply	
Cornwall Chamber of Commerce & Industry	No reply	
Cornwall Federation of Small Businesses	No reply	
Plymouth Citybus	No reply	
Landulph School Headteacher and Chair of Governors	<p>We are responding to the consultation on the Neighbourhood Plan. It is important to take into consideration the capacity of the school to admit further pupils as a result of development taking place.</p> <p>The capacity of the school is set at 84 pupils and there are currently 74 pupils on roll, moving up to a forecast of above 80 in 2019 . We note there is reference to sustaining the local facilities such as the school. It might not be a case of sustaining the school but giving consideration to the need to expand the capacity of the school such as the</p>	Discussed and noted.

	<p>addition of an additional classroom.</p> <p>We are concerned that if individual developments consist of 5 units or less, then an obligation to make an education contribution in a section 106 agreement cannot be imposed.</p> <p>Also if we exceed 100 pupils, then this would mean Landulph School will no longer be designated a small school and this has a significant impact on funding.</p> <p>We hope these comments are useful.</p>	
Cornwall & IoS Local Enterprise Partnership	No reply	
Cornwall Buildings Preservation Trust	No reply	
Devon and Cornwall Police	<p>I could see no specific reference to designing out crime, disorder or anti-social behaviour which I feel should be included within all such Neighbourhood Plans. Whilst these matters are covered within other national and council policies I feel they should also be in the NDP,</p> <p>I would therefore suggest that the following statement or similar is included where appropriate within the NDP “All development</p>	Discussed and noted.

	<p>proposals should consider the need to design out crime, disorder and anti-social behaviour to ensure ongoing community safety and cohesion”</p> <p>This can apply to all forms of development not just housing. May also be just as relevant for 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.</p>	
Cornwall Fire & Rescue Service	No reply	
Cornwall Sports Partnership	No reply	
Cornwall Rural Community Council	No reply	
Cornwall Youth Work Partnership	No reply	
Civil Aviation Authority	No reply	
Cornwall Federation of Women's Institute	No reply	
Duchy of Cornwall	No reply	
Pentillie	No reply	

Saltash Health Centre	No reply	
Port View Doctors	No reply	
Parish Church	No reply	
Businesses in the Parish not receiving newsletter		
Long Orchard x2	No reply	
Trecenna Nursery	No reply	
Crooked Spaniards	No reply	
Organisations in the Parish		
Film Club	No reply	
Gardening Club	No reply	
Good Companions	No reply	
Lively Ladies	No reply	
Pilates	No reply	
Short Mat Bowls	No reply	
Tai chi	No reply	

Pre School/Under 5s and Baby and Toddler	No reply	
Village Choir	No reply	
Yoga	No reply	
Cargreen Yacht Club	No reply	
Landulph Festival	No reply	
Parish Church	No reply	
Landulph Memorial Hall	No reply	