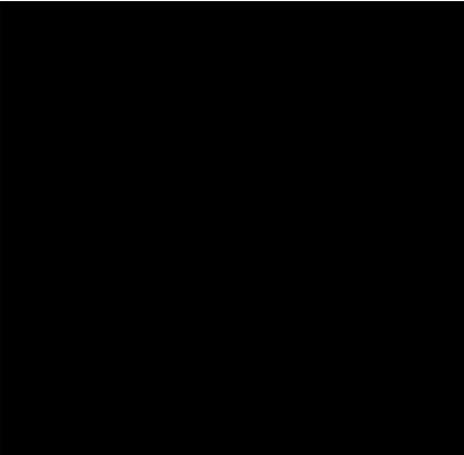


1. Personal Details:

Name: (required)	Rob Tidy
Organisation (if applicable)	
Address line 1	
Address line 2	
Town	
County	
Postcode (required)	
Telephone number	
Email address (if you select email as your preferred method of contact and change your email before the Allocations DPD is adopted, please let us know).	
If you're an agent, please state the individual or organisation you're representing	
Preferred method of contact	Email

2. Legal Compliance, Soundness and Duty to co-operate

Do you consider the Allocations DPD is Legally Compliant?	Yes
Do you consider the Allocations DPD is sound	Yes
Do you consider the Allocations DPD complies with the Duty to co-operate?	Yes

3. Please select from the list below, which town your comments relate to. You can also comment on strategically important employment sites; these are sites which are located within more rural areas outside of the main towns.

	Bodmin
--	---------------

4. You have selected the town of Bodmin

What would you like to comment on (you can select more than one)? **Policy (sites)**

5. You have selected CPIR

What would you like to comment on (you can select more than one)?	
---	--

6. You have selected Eco-Communities

What would you like to comment on (you can select more than one)?

7. You have selected Falmouth and Penryn

What would you like to comment on (you can select more than one)?

8. You have selected the town of Hayle

What would you like to comment on (you can select more than one)?

9. You have selected the town of Helston

What would you like to comment on (you can select more than one)?

10. You have selected the town of Launceston

What would you like to comment on (you can select more than one)?

11. You have selected the town of Newquay

What would you like to comment on (you can select more than one)?

12. You have selected Penzance and Newlyn

What would you like to comment on (you can select more than one)?

13. You have selected the town of Saltash

What would you like to comment on (you can select more than one)?

14. You have selected the town of St Austell

What would you like to comment on (you can select more than one)?

15. Bodmin Policies

Bd-UE4 Callywith Urban Village

16. The Bodmin policies you've selected are listed below. If you selected more than one policy, please type your comments into the relevant boxes.

Bd-UE2 Halgavor Urban Extension

Bd-UE3 St Lawrence's Urban Extension

Bd-UE4 Callywith Urban Village

In the previous published responses to the Bodmin Preferred Options Consultation in 2016 under Alternative 3 which proposed increasing the size of Bd - UE4 it was considered inappropriate to increase the size of the site given various constraints. In fact there

is an additional 16 acres located immediately to the western boundary which is of equivalent topography to the existing site and would be appropriate to include in the Bd - UE4 allocation.

Bd-M1 Castle Street

Bd-E1 Beacon Technology Park

Bd-E2 Walker Lines/Carminow Road
(Safeguarded employment site)

Bd-E3 Bodmin Business Park
(Safeguarded employment site)

Bd-E4 Cooksland Industrial Estate
(Safeguarded employment site)

Bd-E5 Callywith Gate (Safeguarded
employment site)

17. CPIR Policies

18. The CPIR policies you've selected are listed below. If you selected more than one policy, please type your comments into the relevant boxes.

CPIR-UE1 Tolgus

CPIR-E1 Tolvaddon Energy Park

CPIR-E5 Dudnace Lane

CPIR-ED1 Tuckingmill

CPIR-E7 Station Road

CPIR-R1 Fair Meadow

CPIR-E2 Barncoose Industrial Estate
(Safeguarded for employment use)

CPIR-E3 Treleigh Industrial Estate
(Safeguarded for employment use)

CPIR-E4 Cardrew Industrial Estate
(Safeguarded for employment use)

CPIR-E8 Radnor Road, Scorrier
(Safeguarded for employment use)

19. Eco-Communities Policies

20. The Eco-community policies you've selected are listed below. If you selected more than one policy, please type your comments into the relevant boxes.

ECO-M1 West Carclaze

ECO-M2 Par Docks

21. Falmouth Penryn Policies

22. The Falmouth and Penryn policies you've selected are listed below. If you selected more than one policy, please type your comments into the relevant boxes.

FP-H1 College/Hillhead

Your comment

48. Strategy Text - Saltash

Your comment

49. Strategy Text - St Austell

Your comment

50. Evidence documents

51. The Evidence documents you've selected are listed below. If you selected more than one policy, please type your comments into the relevant boxes.

Comprehensive Impact Assessment

Cornwall Retail Report

Eco-community Sustainability Report

Employment Evidence Base Report

Heritage Impact Assessments

Habitat Regulations Assessment

Screening Report

Housing Evidence Base Report

Statement of Community Involvement

Strategic Flood Risk Assessment (SFRA)

Sustainability Appraisal (SA) Report

Town Framework Document

Transport Evidence Report

Other

52. Modification

Please explain what modification(s) you consider are necessary to make the Allocations DPD legally compliant or sound and why this modification will make the Allocations DPD legally compliant or sound. Please be precise and suggest revised wording of any policy or text.

For Bd - UE4 increase the western site boundary given there is a further 16 acres of land of equivalent topography to the current site before the terrain becomes challenging. The boundary would then be the Helland Road and the site would become more regular and logical. This would then enable more amenity land to be located to the north of the site.

Although comments relating to the duty to co-operate can't be amended at examination, if you think the plan doesn't comply we'd still like to know why.

53. Examination in public and further notification

If your comments request a change; do you wish to speak at the oral part of the **No, I do not wish to speak at the oral part of the examination**

examination in public?

The Independent Planning Inspector's published recommendations of the emerging Allocations DPD under section 20 of the Planning and Compulsory Purchase Act 2004

Yes

The adoption of the Allocations DPD

Yes

Please use this postal address to notify me

Please use this email address to notify me

54. Equality Monitoring

Please enter your postcode

Please give your age

How do you describe your gender?

How do you describe your ethnic origin?
(Please read carefully before selecting the ethnic group that you feel most closely reflects your background).

Do you consider yourself to have a disability?

Is there anything we can do or put in place which would make it easier for us to offer you an equal service? (For example documents in large print, hearing loop etc).

Do you need someone to help you understand information? (For example someone to read documents with you or an interpreter).

It would help the Council to know of any barriers you have faced when dealing with us.

Name: Suzanne Dell

Comment:

FP-H1 College/Hillhead

The map is not clear as to what is exactly meant by Hill Head. As locals Hill Head is the narrow road leading up from the bottom of Penryn out towards Lamanva and Treverva. I am particularly concerned at the traffic management for this site. The plan says access will be via Hillhead. I regularly drive down this road, it is narrow and at the bottom, as you approach Penryn, there is a blind right hand bend. The road is used by pedestrians, including school children, and cyclists as well as various sized vehicles. To bring even more traffic onto this road is an accident waiting to happen. This planned estate is some distance from the local schools so parents are most likely to drive their children to school creating yet more congestion on the linking roads and creating further problems for nearby residents at schools' start and finishing times.

FP-H3 Kergilliack (Phase 2)

Again access would appear to be on to the same road as College/Hillhead but I assume further towards Lamanva, again the map is not clear. However I believe it to be further along the road that leads from the bottom of Penryn to Lamanva i.e. the road I have already expressed concern about in the section on College/ Hillhead. Any increase in traffic onto this road is a concern, even though the road may be slightly wider, as it already serves outlying villages. Children from this estate will have some distance to get to school, it is not a safe road to walk on so no doubt parents will have to drive their children to and from school causing even more congestion and problems for residents living close to the school.

FP- M1 Kernick

Again I am concerned about traffic management as access is via the road into Asda. To my knowledge this is not a public road. Too many estates are built with only one access road.

If there is an incident which causes the closure of an access road there is no way on or off an estate. Traffic management in this area has not been good since the Asda store first opened. The store (and now the estate as well) access road has to cope with store and filling station customers plus the estate's residents. The distance between the mini roundabout which serves vehicles from Asda, the estate, B&Q, the industrial estate, the Penryn schools and the residents of Penryn, and the A39 is short and traffic backs up particularly at school times and end of work times for the industrial estate.

FP-M2 Parkengue

I am concerned at the loss of employment space. I thought the land on both sides of Kernick Road from the rugby and cricket fields was designated 'industrial' land. Today I was talking to someone who informed me that The Rebel Brewery currently located in the area designated for student accommodation will have to move out of the immediate Falmouth /Penryn area as there are no other premises available. Whilst I am happy that no more private housing will be taken over for student accommodation (although of course an increase in students means more lecturers and post graduates who will want local accommodation so again more housing will be lost for local families) I am concerned as to whether or not student numbers will increase as proposed. I am aware that student numbers in Plymouth are falling.

FP-E1 Kernick Road Industrial Estate (Safeguarded employment site)

I trust the status of this estate will be maintained as I have heard of a proposal to put students in purpose converted containers behind the now closed store - The Shed.

Strategy Text

2.17 The document talks about encouraging the use of public transport, walking and cycling. The plan for housing developments at College/Hillhead and Kergilliack does not truly support this as I outlined in my comments. 2.18 The importance of the environment.

Housing developments these days cram housing in which have very small gardens, therefore very small areas for the absorption of water into the water tables. Also very small areas for plant growth, plants and trees are important for a number of areas. Whilst I haven't specifically commented on the Falmouth Road development, it is this area which has created flooding of the main road into Falmouth on two separate occasions in recent months. Covering the green areas with concrete/tarmac could increase the risk of further flooding this therefore needs taking into account. 2.19 There is consideration given to design. However Cornwall was an area where red brick was rarely used for building

purposes but suddenly it is evident in some developments. It is not a natural look for Cornwall as granite was predominately used. This should be considered when approving developments. 7.4 Keeping the separate identities of Falmouth and Penryn. The proposed developments at College/Hillhead, Kergilliack and Falmouth Road virtually join the two towns. It therefore needs to be very clear as to which development is in which town. 7.53 and 7.59 Improved services such as healthcare and education should be in place before people move into the new houses. Healthcare is stretched to the limit in Cornwall and no new surgeries or schools have been built in the Falmouth/Penryn area for years. Traffic management around schools is abysmal and getting worse. School numbers will increase and inevitably, without further classroom provision, class numbers will increase which is not in the best interests of the children or those teaching them. In respect of health care, care services are stretched as it is, RCH Treliske commonly suffers with bed blocking, new housing will no doubt bring more people in to the area from out of county, and the increase in student numbers will put further pressure on overstretched and understaffed health and care services.

Modification

This document has been put out for public consideration, in my opinion it will not have been considered by the greater percentage of adults living in the area as it is such a wordy document. It has taken me a whole evening to read it, digest its content and then consider my comments. In the first instance I felt I was just being asked to comment on the legality of it and that maybe what I was being asked to do, but without the area DPD being sent to every household it is my view that many people don't even know of its existence or any previous consultations, and therefore I felt I needed to comment on the site allocations.

Also anyone reading it on a tablet or iPad had to Lay his/her head on its side in order to see the maps which changed position even when turning the iPad.

**Cornwall Site Allocations Development
Plan Document (Allocations DPD):**
Pre-Submission (Regulation 19) Consultation



Representation Form

Please return your completed form
by email: delivery@cornwall.gov.uk OR
by post: Cornwall Council, Local Plans Team, Pydar House, Pydar
Street, Truro TR1 1XU OR
by hand: New County Hall reception (Truro) or any Cornwall Council
One Stop Shop
before 5pm on Monday 7 August 2017

Fair Processing Notice

Your feedback, which will be retained for the life of the plan, will help Cornwall Council to finalise the Cornwall Site Allocations Development Plan Document (Allocations DPD).

The 2012 Town and Country Planning Regulations require all comments received to be submitted to the Secretary of State, so your information will be shared with the Department of Communities and Local Government and the Planning Inspectorate.

By submitting this survey you are giving Cornwall Council your consent to put your full name (excluding personal contact details and any signatures) and comments into the public domain; for publishing online on the Council's website and in hard copy.

Information provided on the Equality Monitoring Form will not be published and will be retained for up to three months from the close of the consultation.

Part 1

1. Your contact details

You must complete this page for your representation to be accepted. The Council cannot accept anonymous representations.

Name: Mrs E J Butterworth

Organisation (if applicable):

Address: [REDACTED]

Postcode [REDACTED]

Email Address: [REDACTED]

Telephone number: [REDACTED]

If you're an agent, please state the individual or organisation you're representing

n/a

2. Legal Compliance, Duty to co-operate and Soundness

This plan is published so that public comments can be considered alongside the plan when it's submitted and examined by an Independent Planning Inspector.

The purpose of the examination, as stated in the Planning and Compulsory Purchase Act 2004 (as amended), is to consider if the plan complies with:

Legally compliant – does the plan:

- Appear in the Local Development Scheme timetable which sets out when Local Development Documents are produced by the Council as part of the Cornwall Local Plan?
- Agree with the Local Planning Authority's (LPA) Statement of Community Involvement?
- Comply with the Town and Country Planning Regulations 2012?
- Have a Sustainability Appraisal Report (if required)?

Sound - A plan is deemed sound if it satisfies key points:

- Positively prepared
- Justified
- Effective
- Consistent with national policy

Duty to co-operate - this is a legal test that requires co-operation between local planning authorities (LPA) and other public bodies to maximise the effectiveness of policies for strategic matters. It is separate from but related to test of soundness. The LPA will provide evidence of how they have complied with any requirements arising from the duty.

Do you consider the Allocations DPD is Legally Compliant?

Yes No **Don't know**

Do you consider the Allocations DPD is sound?

Yes

No

Don't know

Do you consider the Allocations DPD complies with the Duty to cooperate?

Yes

No

Don't know

Part 2

3. Your comments

Please select from the list below, which town your comments relate to. You can also comment on strategically important employment sites; these are sites which are located within more rural areas.

If you wish to comment on more than one area, please complete a separate survey for each.

- | | |
|---|---|
| <input type="checkbox"/> Bodmin | <input type="checkbox"/> Launceston |
| <input type="checkbox"/> Camborne/Pool/Illogan/Redruth (CPIR) | <input type="checkbox"/> Newquay |
| <input type="checkbox"/> Eco-community | <input checked="" type="checkbox"/> Penzance and Newlyn |
| <input type="checkbox"/> Falmouth and Penryn | <input type="checkbox"/> Saltash |
| <input type="checkbox"/> Hayle | <input type="checkbox"/> St Austell |
| <input type="checkbox"/> Helston | <input type="checkbox"/> Strategically important employment sites |

Please give precise comments saying why you think the plan is or is not legally compliant or sound and explain how you would modify the plan to make it legally compliant or sound.

My comment relates to *(please select one)*:

Policy (site) (please provide the policy number you are referring to)	
Strategy text (please state the section you are referring to e.g. employment, housing etc.)	Vision para. 3.6 and Specific Strategic Aims para 3.8
Evidence document (please note which document you are referring to)	

Your comment

The wording of the Vision for Penzance and surrounding villages is not sound –

It does not reflect the needs, concerns and aspirations of the local community as a whole, .

In particular, it does not address effectively the need for genuinely affordable housing, a broader based and better paid economy or community infrastructure that is relevant to the community rather than primarily to visitors.

The Vision statements for other towns (for example Hayle) reflect the issues that are important to local people and the community as a whole. The local community in Penzance, beyond the Steering Group which met ‘behind closed doors’, has not been effectively involved in the Plan process with no public involvement or consultation during the main preparation stage between 2012 and October 2016.

Policy 2 Spatial Strategy (Cornwall Local Plan , adopted strategic policies) includes specific reference to safeguarding water front sites, docks and ports to provide for marine industries (clause (d)), giving particular emphasis to quality, permanent, work opportunities that break seasonal labour cycles (clause (f)), and to the economic regeneration of Penzance including the improvement of Penzance harbour (clause (p)) – these objectives are particularly relevant to the Penzance and Newlyn area but are not reflected in the ‘Vision’ as set out in the Allocations DPD.

The Penzance area is badly let down by the Plan which persists in promoting a narrow vision based on tourism at the expense of other important aspects including

- quality of life for residents,
- protection of the area’s high environmental and historic quality for its own sake as well as for residents and visitors;
- a clear strategic emphasis on the overriding importance of achieving housing that can be afforded by those living and working in the area; and
- objectives for a wider economic base beyond tourism driven industries.

How would you change the plan so it is legally compliant or sound?

Rewrite the Vision for the Penzance area to aspire to be a vibrant inclusive community with a clear emphasis on providing

- genuinely affordable housing;
- a broader based economy beyond the largely visitor driven sectors;
- improved community and leisure facilities for the benefit of residents who live and work in the town and surrounding network area; and
- effective recognition of the importance of the natural and historic environment of the town and its surroundings as a whole, not just its position on the edge of Mount's Bay.

Include a Strategic Aim to provide affordable housing that meets the needs of the whole area as a priority within the targets agreed,

Include reference in the Strategic Aims to other economic activity that is important to, and provides opportunities for, a broader based economy such as farming, fishing and food and small scale engineering (currently being boosted by development of the rail maintenance facility).

Amend and strengthen the policies and proposals in the Allocations DPD to deliver the strategic Aims effectively, in particular

- Green Infrastructure that reflects the needs and aspirations of local communities, including as expressed in Strategic Aim 9 "To ensure the settlements of Penzance, Newlyn, Heamoor, Gulval and Long Rock maintain their individual and distinctive characters."
- To strengthen Penzance town centre within the existing town centre, not outside it or in the harbour area which should be safeguarded for activities directly related to and enhancing its primary (water related) function.
- Agricultural land around Gulval and Penzance is of the highest quality and should be safeguarded in line with Objectives in the Local Plan Strategic Policies document - to support both new and traditional businesses including farming. and to make the most of our environment including supporting local food production.

The need for such changes in the Site Allocations Document is particularly important to the wider communities of Penzance (beyond the waterfront), Newlyn, and the villages of Heamoor, Gulval and Long Rock because of the lack of a Neighbourhood Development Plan that addresses these issues. While the Neighbourhood Plan designation letter from Penzance Town Council refers to the administrative parish the work the plan focus is limited to the town centre and harbour area – it does not address the wider environmental, economic, recreational or social infrastructure that is important to local residents and communities.

My comment relates to *(please select one)*:

Policy (site) (please provide the policy number you are referring to)	
Strategy text (please state the section you are referring to e.g. employment, housing etc.)	Housing paras. 3.39 to 3.44
Evidence document (please note which document you are referring to)	

Your comment

The allocation of sites in or on the edge of the villages of Heamoor, Gulval and Long Rock for such a high proportion of the housing target for Penzance and Newlyn is not sound, justified or likely to be the most effective way of meeting the need for affordable housing in the area.

Housing required for Penzance should be allocated only on sites that are well related to the urban area and where safe and attractive pedestrian access is available, or can be provided, to the town centre.

Notwithstanding the targets set out in the adopted Cornwall Local Plan Strategic Policies document for the distribution of housing between Penzance and Newlyn (with Heamoor, Gulval and Long Rock) and the rest of the West Penwith Community Network Area (CNA), preparation of the Site Allocations Document has demonstrated that the Penzance urban area does not have the capacity to deliver the target of 2,150 dwellings without swamping nearby villages with an inappropriate scale of development, contrary to the stated Aim in the Document to maintain the separate character and identity of those villages and ignoring the concerns of local communities about the increased impact of traffic, pollution and flood risk.

The villages of Heamoor, Gulval and Long Rock should be treated in the same way as villages in the rest of the West Penwith Community Network Area (CNA).

Other smaller towns and villages also have good access to the main road network and 'bus routes, or have existing facilities to support an appropriate amount of new housing, especially locally needed affordable housing.

Small, well designed sites in a range of suitable settlements over the Plan period could provide for more than the target figure of 1000 dwellings with less impact than the excessive scale of sites currently proposed on the edges of Heamoor and Long Rock.

The number of dwellings required to meet the target for the rest of the CNA (residual figure 2016) had already reduced to 162 dwellings, which makes little provision for meeting rural local needs over the rest of the Plan period. Given the number of key settlements in the rest of the CNA an increase of, on average, only 1 or 2 dwellings per year per settlement over the remainder of the Plan period could provide for between 150 and 200 additional dwellings. These dwellings could be targeted more effectively at meeting the need for affordable housing via rural exception

sites (adopted strategic Policy 9) than by general housing allocations which immediately inflate land values.

Such an approach would be particularly relevant to those registered as being in need of housing in Penzance, because of the perception that it is more likely to be met in the town, but whose preference would be to live where they have local family connections.

Redistribution of housing targets between Penzance and the rest of the CNA would allow for housing allocations having the greatest impact on the villages of Heamoor, Gulval and Long Rock to be deleted or limited in scale.

How would you change the plan so it is legally compliant or sound?

AMEND the plan

- to identify that the current distribution of housing between Penzance and the rest of the West Penwith CNA is not deliverable without an unacceptable impact on the villages of Heamoor, Gulval and Long Rock and, consequently,
- to reduce the target for allocated sites in the Penzance area to relate more closely to identified housing need and include an allowance for affordable led rural exception sites in appropriate villages across the CNA.

DELETE or reduce the scale of the proposed allocations in the villages of Heamoor, Gulval and Long Rock that would have most impact in terms of traffic, air pollution and flood risk, to achieve a more appropriate level of growth that can be integrated with the village communities.

AMEND the plan to ensure that any expansion of the urban area includes effective measures, such as green corridors and planted buffers, to maintain the individual and separate identities of Penzance, Newlyn, Heamoor, Gulval and Long Rock.

My comment relates to *(please select one)*:

Policy (site) (please provide the policy number you are referring to)	
Strategy text (please state the section you are referring to e.g. employment, housing etc.)	Green Infrastructure paras. 3.65 to 3.74 and Figure PZ4.
Evidence document (please note which document you are referring to)	

Your comment

The approach to Green Infrastructure in the Penzance chapter of the Allocations DPD is not sound; it is not positively prepared, justified or effective in responding to issues that are important to local people or taking forward relevant strategic policies in the adopted Local Plan.

The West Penwith CNA section of Cornwall Local Plan identifies two policy approaches to Green Infrastructure

- Maintain / enhance existing strategic green corridors to help preserve the identities of the communities that they separate; whilst also providing walking and cycling routes, ecological corridors, etc.; and
- Deliver new and improved public open space and green links as part of new developments to provide an enhanced range of recreational facilities, linking the town with the coast and the countryside and also help to deliver some of the sustainable transport objectives.

Para. 2.18.4 in the Site Allocations Document refers specifically to Green Infrastructure corridors that can provide green links, offering biodiversity and other benefits but also “a mechanism to maintain the separate identities of the various communities that make up an area, where appropriate”.

Maintaining the separate identities of Penzance, Newlyn, Heamoor, Gulval and Long Rock (as expressed in Aim 9 in the Document) is a key objective for local communities, especially for the villages of Gulval and Heamoor. This is an important element of the plan coming from early consultations which should be respected, and taken forward, in a meaningful way.

While this objective has been carried forward as an Aim, and recognised as a principle in para. 3.16 - “Any such (housing) extensions must be delivered sensitively, ensuring their design and location support the principle of maintaining the separate identities of the communities of Penzance, Newlyn, Heamoor, Gulval and Long Rock” - there is little else in the Document that carries it forward effectively.

There are existing green breaks, or corridors, that are of significant importance in maintaining the separate identities of the settlements referred to in Aim 9 – Newlyn Coombe; Trannack allotment field and adjacent footpath corridor on the eastern edge of Heamoor; Chy an Dour Coombe and the adjacent prominent ridge of farmland (Ponsandane farm) that separates Gulval village and Penzance urban area; Posses Lane between Gulval (Churchtown) and the commercial expansion of the town into Eastern Green; and Tolverth lane and recreational area on the western edge of Long Rock village.

These corridors were included in the former Penwith Local Plan as open areas of local significance and received strong community support. While it is recognised that those open areas have to be reviewed in the current context of an increased housing requirement, the separation between settlements was one of the functions of the open areas that could, and should, be carried forward in the new Local Plan, specifically the Site Allocations Document.

In preparing a Village Plan for Gulval* the strongest aspiration of people in the village, through successive public consultation events, was to retain the separate identity of the village and to protect the physical and visual green breaks that are important to that individual character and identity.

Figure PZ4 in the Site Allocations document (Green Infrastructure) does not include these green corridors, despite their importance to local communities or relevance to Aim 9 in the Allocations Document and the approach to Green Infrastructure identified in the West Penwith Community Network Area section.

*Gulval Village Community Association was formed in 2014 in response to potential large scale housing development on the edges of the village. Local residents packed the Village Hall to voice their opposition to development on that scale and their strong support for maintaining the separate character and identity of the village. Following two stages of consultation (including a "Village ConVersation" where people were asked to identify their aspirations for the future of the village and the issues that needed addressing) a Village Plan was prepared and adopted by the AGM. The purpose of the Plan is to give a voice to the village community and it has provided the basis for the comments, and proposed changes, in this response.

How would you change the plan so it is legally compliant or sound?

AMEND Figure PZ4 (Green Infrastructure) to reflect the approach set out in the West Penwith CNA section (para. 2.21) – to maintain/enhance existing strategic green corridors which help preserve the identities of the communities that they separate (Penzance/Newlyn/Heamoor/Gulval/Long Rock) whilst also providing walking and cycling routes, ecological corridors etc
by

1. Extending the green corridor in Newlyn Coombe to include the wider valley and Mount Misery as important to the separate identity of Newlyn whilst also enhancing the use of footpath links to open countryside in addition to the "Key habitat" corridor and existing/potential walking and cycling route shown;
2. Including the green corridor comprising the Trannack allotments field, the adjacent footpath corridor and an appropriate buffer (as

identified in adopted Policy 25 clause 3 of the CLP Strategic Policies Document) on the eastern edge of Heamoor for its importance to the separate identity of Heamoor, and reflect this in the requirements for the proposed housing site (PZ H4);

3. Including the existing green corridor of Chy an Dour stream and Ponsandane Farm for its importance to the separate identity and individual character of Gulval village, as well as to the setting of Penzance, whilst also enhancing the ecological corridor along the stream and use of the existing walking and cycling route through Chy an Dour Coombe;

4. Linking the green corridor and existing/potential walking and cycling route in Chy an Dour Coombe to the "enhanced green corridor" and proposed recreational site within the proposed housing allocation at Trannack (PZ H4), and through the allocation to link with existing footpaths into open countryside (so linking town, coast and countryside);

(Note: PZ4 currently shows a proposed walking/cycling route linking the Coombe with the open farmland to the south east of the allocation – nice views but going nowhere).

5. Extending (and amending) the "enhanced existing green corridor" at Posses Lane to include the wetland habitat and fields between Eastern Green (Jelbert Way) and Gulval Churchtown as being important to the separate identity of Gulval Churchtown as well as for biodiversity, potential for enhancing footpath/cycle links between coast, Gulval Churchtown and open countryside including Gulval Carn, Trevaylor, Tolver/Tremenheere Woods and St. Michael's Way;

6. Include the green corridor comprising Tolverth stream and the recreational field on the western edge of Long Rock as important to the individual identity of Long Rock village, and as an "enhanced existing green corridor" and existing/potential walking and cycling route between the village and open countryside including Tolver/Tremenheere Woods and St Michael's Way.

7. Include a green corridor or buffer to the east of a (smaller) housing allocation in Long Rock to maintain its village identity and clear separation from any additional employment allocation

My comment relates to *(please select one)*:

<p>Policy (site) (please provide the policy number you are referring to)</p>	<p>PZ- H2 Posses Lane</p>
--	---------------------------

<p>Strategy text</p> <p>(please state the section you are referring to e.g. employment, housing etc.)</p>	
<p>Evidence document</p> <p>(please note which document you are referring to)</p>	

Your comment

Proposal PZ H2 is not sound.

The Introduction to the Site Allocations Document (para. 1.1) states that "Creating healthy, sustainable and attractive communities for our residents represents a core component of Cornwall Council's strategy to make a positive difference to the quality of local residents' lives".

The proposed allocation of land at Posses Lane for housing will not make a positive difference to the quality of local residents' lives as a result of

- increase in traffic on to Posses Lane, to and through Churchtown as well as to Jelbert Way,
- negative impact on the important green corridor between Eastern Green and Gulval Churchtown,
- lack of integration with an existing residential area, and
- a poor quality residential environment with commercial uses and excessive security lighting immediately adjacent and a potential helicopter flight path overhead.

How would you change the plan so it is legally compliant or sound?

Delete Proposal PZ H2.

My comment relates to *(please select one)*:

<p>Policy (site) (please provide the policy number you are referring to)</p>	<p>PZ H3 Additional Policy requirements Gulval (Trevarrack)</p>
<p>Strategy text (please state the section you are referring to e.g. employment, housing etc.)</p>	
<p>Evidence document (please note which document you are referring to)</p>	

Your comment

We consider the additional policy requirements for safe pedestrian connections, between the proposed housing allocation in Gulval (Trevarrack) and Pendrea Road, Trevarrack Noweth (wrongly identified as Chynoweth Gardens) and the footpath to the north; the preference to provide land to deliver an open space on site; and the effective management of surface water on the site, to be sound and positively prepared in that the proposal now reflects and respects responses to consultation from the local community.

Provision within the site for at least part of the open space provision for Gulval is in line with the community's Village Plan and a long standing objective to provide a children's play space on this central and accessible site. A play space to serve the village, not just the development, could be included with a minimal increase in density (which would be in keeping with adjacent terraced housing, characteristic of Gulval). Provision on the north west boundary would help retain the open and attractive character of the footpath to the north of the site and, with planting, safeguard the privacy of adjacent dwellings. There is also potential for dual use of the surface water management area in the south west of the site for a small community seating space.

In view of potential developer or landowner objections to these requirements we ask that these comments are made available to the Inspector.

How would you change the plan so it is legally compliant or sound?

We welcome the policy requirements and wish to see them retained, and implemented through the planning application process – in particular, the inclusion of open space and play space within the site to serve the village as a whole, new pedestrian links as proposed and no increase in the number of dwellings proposed.

The local community would also like to see an emphasis on affordable led housing that is related specifically to housing need within Gulval village (defined as the polling district) through a planning agreement and cascade approach.

My comment relates to *(please select one)*:

<p>Policy (site) (please provide the policy number you are referring to)</p>	<p>PZ H11 Additional Policy requirements former Barn Club site</p>
<p>Strategy text (please state the section you are referring to e.g. employment, housing etc.)</p>	
<p>Evidence document (please note which document you are referring to)</p>	

Your comment

The proposed allocation of this previously developed site is supported. However, inclusion of a requirement for a footpath on the western boundary is not sound UNLESS it is linked to better traffic management and pedestrian safety measures for the rest of Trevarrack Lane (which leads to Gulval village and post office). There should be no expectation or encouragement for increased pedestrian use of the lane as it is which is narrow and hazardous.

How would you change the plan so it is legally compliant or sound?

Delete reference to the additional requirement to provide a footpath on the western boundary unless it is linked to traffic management and pedestrian safety measures along the length of Trevarrack Lane.

My comment relates to *(please select one)*:

Policy (site) (please provide the policy number you are referring to)	PZ-H4 Trannack
Strategy text (please state the section you are referring to e.g. employment, housing etc.)	
Evidence document (please note which document you are referring to)	

Your comment

The proposed allocation is of a scale that is totally inappropriate to Heamoor village. Development of this scale can only be justified by the housing requirement for Penzance and by being seen as an extension of the urban area.

There should be a clearer emphasis on linking it effectively to the town and town centre, including primary schools (Pensans and St. Mary's RC which are both closer than Heamoor Primary), Humphry Davy Secondary school which is closer than Mount's Bay, proposed Health Centre at St Clare etc. all of which can be accessed safely by walking and cycling via existing routes including the underpass from Treneere Lane to Manor Way.

Maintaining the separate identity of Heamoor village through inclusion of a buffer to enhance the existing green corridor (allotments and footpath) to the west of the site should also be a priority.

Pedestrian links on to Polmennor Road/Trannack Lane to the north should not be permitted – the lane is narrow in many places and is unsafe for pedestrians. Alternative safer routes are available. This attractive and historic rural route linking the villages of Gulval and Heamoor should be protected by ensuring existing hedgerows along the northern boundary of the site are retained and enhanced by a planted buffer between the site and the lane and open countryside. Pedestrian use of the 'enhanced green corridor' shown in Figure PZ4 should not be encouraged unless it is within the allocated site; pedestrian access to Trannack Lane should be limited to existing footpaths through the site together with improved access from Treneere and Chy an Dour Coombe.

Vehicular access to the site only from the A 30 as proposed, with no vehicular links to Trannack Lane/Polmennor Road to the north, is supported and must be ensured through the planning application process.

How would you change the plan so it is legally compliant or sound?

AMEND Proposal PZ H4 (additional requirements) and supporting text in paras. 3.43 and 3.44 to prioritise integration of the site with the town and town centre – in particular to emphasise safe pedestrian access via the existing crossing under the A 30 to Coombe Lane and Manor Way (as well as the additional pedestrian crossing points to be delivered on the A.30 (clause f)) and on to schools within the town, Truro and Penwith College, the proposed health centre at St Clare,

hospital, other facilities and employment opportunities.

AMEND Proposal PZ H4 (additional requirements) to include a planted buffer on the western boundary of the site to maintain the separate identity of Heamoor village in line with the approach to Green Infrastructure set out in the West Penwith Community Network Area section (para. 2.21) – to maintain/enhance existing strategic green corridors which help preserve the identities of the communities that they separate.

AMEND Proposal PZ H4 (additional requirements) to retain existing hedgerows along the northern boundary of the site/Polmennor Road/Trannack Lane and include additional tree planting as a buffer between the housing site and the rural character of Polmennor Road/Trannack Lane and open countryside beyond.

DELETE reference to pedestrian connections on to Polmennor Road (clause e)

My comment relates to *(please select one)*:

<p>Policy (site) (please provide the policy number you are referring to)</p>	<p>PZ-H5 Polmennor Road, Heamoor</p>
<p>Strategy text (please state the section you are referring to e.g. employment, housing etc.)</p>	
<p>Evidence document (please note which document you are referring to)</p>	

Your comment

This allocation is not sound. It is not positively prepared in terms of its impact on the existing Heamoor village community, particularly in view of existing traffic and flooding issues.

Development of this site will add to existing congestion, danger to

pedestrians and pollution in the centre of Heamoor village. It is also likely that traffic will increase on Polmennor Road/Trannack Lane to the east of the site, which is totally unsuitable for additional traffic, and so to the A 30, adding to the traffic through Gulval, especially on to the B3311 (St Ives road) where it is narrow and unsafe for pedestrians.

How would you change the plan so it is legally compliant or sound?

DELETE Proposal PZ H5

My comment relates to *(please select one)*:

<p>Policy (site) (please provide the policy number you are referring to)</p>	
<p>Strategy text (please state the section you are referring to e.g. employment, housing etc.)</p>	<p>Infrastructure including Figure PZ4 (Green Infrastructure)</p>
<p>Evidence document (please note which document you are referring to)</p>	

Your comment:

There is no clear relationship between the text (paras. 3.66 to 3.67) and the notations in Figure PZ4 Green Infrastructure. As a result the Figure is confusing and ineffective in presenting a clear green infrastructure strategy for the Penzance area.

The focus of the Penzance Neighbourhood Plan on the town centre and harbour area, rather than on community infrastructure across the town, as a whole, and surrounding villages, means that this aspect of the Local Plan (Allocations Document) is particularly important.

1. The meaning of "Key habitat green corridor", "Existing ecological resource" and "Enhanced existing green corridor" are not explained and bear little relationship to the supporting text.
2. The text (para. 3.67) should emphasise equally the importance of links from within the town to sites such as Trengwainton, Trevaylor and Tremenheere (Tolver) woods, not just from sites on the edge of the town.
3. Ponsandane stream and Chy an Dour stream are identified in the text as having biodiversity value which should be "protected, enhanced and managed positively"; however, neither river corridor is identified in Figure PZ4 by any related designation.
4. There is no "existing/potential walking/cycling route" linking Chy an Dour Coombe via a new crossing of the A.30 to the Trannack allocation (but there is a new route shown linking to nearby but unconnected farmland which appears to be an error)
5. Posses Lane to Trenow (Gulval) is shown as an "existing/potential walking/cycling route" connecting coast and countryside. While the principle is supported the route shown would involve increased use of Posses Lane, which should not be encouraged without effective traffic management and/or pedestrian safety measures, a new route across privately owned land, which is considered unnecessary and unrealistic, and the use of a very dangerous stile/exit on to the B3311 (Gulval – St. Ives road). at Keneggy which should be avoided not encouraged.
6. Activity focal points show some, but not all, primary schools in the town and omits Humphry Davy Secondary School in Coombe Road which is a focus for significant community use as well as school activity.

How would you change the plan so it is legally compliant or sound?

ADD TO para. 3.67 to explain the relationship between the values described and the notations in Figure PZ4, and emphasise the importance of green links from within the town as a whole to open

countryside/specific places not just from sites on the edge of the town, to provide a clearer and more positive basis for Green Infrastructure provision.

INCLUDE Chy an Dour stream and Ponsandane stream as key habitat or enhanced existing green corridors to reflect their biodiversity value.

INCLUDE a potential walking/cycling route linking Chy an Dour Coombe with the Trannack housing allocation (PZ H4).

AMEND the Posses Lane pedestrian/cycling route to be more relevant, realistic and safe.

INCLUDE the existing footpath along the eastern boundary of Ponsandane Field, together with a new route along its southern boundary linking to the B3311 by Ponsandane Care Home, as an existing/potential walking/cycling route which would link housing areas in Eastern Green and Gulval with the edge of Penzance and avoid the Branwell Lane/A30 roundabout.

INCLUDE all primary schools in the town, and Humphry Davy School, as Activity focal points.

If you require more space, please add more comment boxes following the same format above.

5. Examination in public and further notification

If your comment(s) request a change; do you wish to speak at the oral part of the examination

No I do not wish to speak at the public examination xx

Yes I do wish to speak at the public examination

Please note even if you've selected that you wish to speak at the examination, the Independent Planning Inspector will decide who, if anyone, should speak publically. Even if you select No, your written comments will still be considered by the Inspector and given the same weight as verbal comments at a hearing session.

Further notification

Please let us know if you would like to be notified on either or both of the following:

The Independent Planning Inspector's published recommendations of the emerging Allocations DPD under section 20 of the Planning and Compulsory Purchase Act 2004

Yes No

The adoption of the Allocations DPD

Yes No

If you have answered Yes to either of the questions above and your preferred contact details differ to those already given, please enter the details below.

Please use this postal address to notify me

Please use this email address to notify me

**Cornwall Site Allocations Development
Plan Document (Allocations DPD):**
Pre-Submission (Regulation 19) Consultation



Representation Form

Please return your completed form

by email: delivery@cornwall.gov.uk OR
by post: Cornwall Council, Local Plans Team, Pydar House, Pydar
Street, Truro TR1 1XU OR
by hand: New County Hall reception (Truro) or any Cornwall Council
One Stop Shop

before 5pm on Monday 7 August 2017

Fair Processing Notice

Your feedback, which will be retained for the life of the plan, will help Cornwall Council to finalise the Cornwall Site Allocations Development Plan Document (Allocations DPD).

The 2012 Town and Country Planning Regulations require all comments received to be submitted to the Secretary of State, so your information will be shared with the Department of Communities and Local Government and the Planning Inspectorate.

By submitting this survey you are giving Cornwall Council your consent to put your full name (excluding personal contact details and any signatures) and comments into the public domain; for publishing online on the Council's website and in hard copy.

Information provided on the Equality Monitoring Form will not be published and will be retained for up to three months from the close of the consultation.

Part 1

1. Your contact details

You must complete this page for your representation to be accepted. The Council cannot accept anonymous representations.

Name: Peter Menear

Organisation (if applicable):

Address:

Postcode

Email Address:



Telephone number:



If you're an agent, please state the individual or organisation you're representing

[Click here to enter text.](#)

2. Legal Compliance, Duty to co-operate and Soundness

This plan is published so that public comments can be considered alongside the plan when it's submitted and examined by an Independent Planning Inspector.

The purpose of the examination, as stated in the Planning and Compulsory Purchase Act 2004 (as amended), is to consider if the plan complies with:

Legally compliant – does the plan:

- Appear in the Local Development Scheme timetable which sets out when Local Development Documents are produced by the Council as part of the Cornwall Local Plan?
- Agree with the Local Planning Authority's (LPA) Statement of Community Involvement?
- Comply with the Town and Country Planning Regulations 2012?
- Have a Sustainability Appraisal Report (if required)?

Sound - A plan is deemed sound if it satisfies key points:

- Positively prepared
- Justified
- Effective
- Consistent with national policy

Duty to co-operate - this is a legal test that requires co-operation between local planning authorities (LPA) and other public bodies to maximise the effectiveness of policies for strategic matters. It is separate from but related to test of soundness. The LPA will provide evidence of how they have complied with any requirements arising from the duty.

Do you consider the Allocations DPD is Legally Compliant?

Yes

No

Don't know

Do you consider the Allocations DPD is sound?

Yes **No** Don't know

Do you consider the Allocations DPD complies with the Duty to co-operate?

Yes No **Don't know**

Part 2

3. Your comments

Please select from the list below, which town your comments relate to. You can also comment on strategically important employment sites; these are sites which are located within more rural areas.

If you wish to comment on more than one area, please complete a separate survey for each.

- | | |
|---|---|
| <input type="checkbox"/> Bodmin | <input type="checkbox"/> Launceston |
| <input type="checkbox"/> Camborne/Pool/Illogan/Redruth (CPIR) | <input type="checkbox"/> Newquay |
| <input type="checkbox"/> Eco-community | <input checked="" type="checkbox"/> Penzance and Newlyn |
| <input type="checkbox"/> Falmouth and Penryn | <input type="checkbox"/> Saltash |
| <input type="checkbox"/> Hayle | <input type="checkbox"/> St Austell |
| <input type="checkbox"/> Helston | <input type="checkbox"/> Strategically important employment sites |

Please give precise comments saying why you think the plan is or is not legally compliant or sound and explain how you would modify the plan to make it legally compliant or sound.

My comment relates to *(please select one)*:

Policy (site) (please provide the policy number you are referring to)	
Strategy text (please state the section you are referring to e.g. employment, housing etc.)	Vision para. 3.6 and Specific Strategic Aims para 3.8
Evidence document (please note which document you are referring to)	

Your comment

The wording of the Vision for Penzance and surrounding villages is not sound –

It does not reflect the needs, concerns and aspirations of the local community as a whole, .

In particular, it does not address effectively the need for genuinely affordable housing, a broader based and better paid economy or community infrastructure that is relevant to the community rather than primarily to visitors.

The Vision statements for other towns (for example Hayle) reflect the issues that are important to local people and the community as a whole. The local community in Penzance, beyond the Steering Group which met ‘behind closed doors’, has not been effectively involved in the Plan process with no public consultation during the main preparation stage between 2012 and October 2016.

Policy 2 Spatial Strategy (Cornwall Local Plan , adopted strategic policies) includes specific reference to safeguarding water front sites, docks and ports to provide for marine industries (clause (d)), giving particular emphasis to quality, permanent, work opportunities that break seasonal labour cycles (clause (f)), and to the economic regeneration of Penzance including the improvement of Penzance harbour (clause (p)) – these objectives are particularly relevant to the Penzance and Newlyn area but are not reflected in the ‘Vision’ as set out in the Allocations DPD.

The Penzance area is badly let down by the Plan which persists in promoting a narrow vision based on tourism at the expense of other important aspects including

- quality of life for residents,
- protection of the area’s high environmental and historic quality for its own sake as well as for residents and visitors;
- a clear strategic emphasis on the overriding importance of achieving housing that can be afforded by those living and working in the area; and
- objectives for a wider economic base beyond tourism driven industries.

How would you change the plan so it is legally compliant or sound?

Rewrite the Vision for the Penzance area to aspire to be a vibrant inclusive community with a clear emphasis on providing

- genuinely affordable housing;
- a broader based economy beyond the largely visitor driven sectors;
- improved community and leisure facilities for the benefit of residents who live and work in the town and surrounding network area; and
- effective recognition of the importance of the natural and historic environment of the town and its surroundings as a whole, not just its position on the edge of Mount's Bay.

Include a Strategic Aim to provide affordable housing that meets the needs of the whole area as a priority within the targets agreed,

Include reference in the Strategic Aims to other economic activity that is important to, and provides opportunities for, a broader based economy such as farming, fishing and food and small scale engineering (currently being boosted by development of the rail maintenance facility).

Amend and strengthen the policies and proposals in the Allocations DPD to deliver the strategic Aims effectively, in particular

- Green Infrastructure that reflects the needs and aspirations of local communities, including as expressed in Strategic Aim 9 "To ensure the settlements of Penzance, Newlyn, Heamoor, Gulval and Long Rock maintain their individual and distinctive characters."
- To strengthen Penzance town centre within the existing town centre, not outside it or in the harbour area which should be safeguarded for activities directly related to and enhancing its primary (water related) function.
- Agricultural land around Gulval and Penzance is of the highest quality and should be safeguarded in line with Objectives in the Local Plan Strategic Policies document - to support both new and traditional businesses including farming. and to make the most of our environment including supporting local food production.

The need for such changes in the Site Allocations Document is particularly important to the wider communities of Penzance (beyond the waterfront), Newlyn, and the villages of Heamoor, Gulval and Long Rock because of the lack of a Neighbourhood Development Plan that addresses these issues. While the Neighbourhood Plan designation letter from Penzance Town Council refers to the administrative parish the work the plan focus is limited to the town centre and harbour area – it does not address the wider environmental, economic, recreational or social infrastructure that is important to local residents and communities.

My comment relates to *(please select one)*:

Policy (site) (please provide the policy number you are referring to)	
Strategy text (please state the section you are referring to e.g. employment, housing etc.)	Housing paras. 3.39 to 3.44
Evidence document (please note which document you are referring to)	

Your comment

The allocation of sites in or on the edge of the villages of Heamoor, Gulval and Long Rock for such a high proportion of the housing target for Penzance and Newlyn is not sound, justified or likely to be the most effective way of meeting the need for affordable housing in the area.

Housing required for Penzance should be allocated only on sites that are well related to the urban area and where safe and attractive pedestrian access is available, or can be provided, to the town centre.

Notwithstanding the targets set out in the adopted Cornwall Local Plan Strategic Policies document for the distribution of housing between Penzance and Newlyn (with Heamoor, Gulval and Long Rock) and the rest of the West Penwith Community Network Area (CNA), preparation of the Site Allocations Document has demonstrated that the Penzance urban area does not have the capacity to deliver the target of 2,150 dwellings without swamping nearby villages with an inappropriate scale of development, contrary to the stated Aim in the Document to maintain the separate character and identity of those villages and ignoring the concerns of local communities about the increased impact of traffic, pollution and flood risk.

The villages of Heamoor, Gulval and Long Rock should be treated in the same way as villages in the rest of the West Penwith Community Network Area (CNA).

Other smaller towns and villages also have good access to the main road network and 'bus routes, or have existing facilities to support an appropriate amount of new housing, especially locally needed affordable housing.

Small, well designed sites in a range of suitable settlements over the Plan period could provide for more than the target figure of 1000 dwellings with less impact than the excessive scale of sites currently proposed on the edges of Heamoor and Long Rock.

The number of dwellings required to meet the target for the rest of the CNA (residual figure 2016) had already reduced to 162 dwellings, which makes little provision for meeting rural local needs over the rest of the Plan period. Given the number of key settlements in the rest of the CNA an increase of, on average, only 1 or 2 dwellings per year per settlement over the remainder of the Plan period could provide for between 150 and 200 additional dwellings. These dwellings could be targeted more effectively at meeting the need for affordable housing via rural exception

sites (adopted strategic Policy 9) than by general housing allocations which immediately inflate land values.

Such an approach would be particularly relevant to those registered as being in need of housing in Penzance, because of the perception that it is more likely to be met in the town, but whose preference would be to live where they have local family connections.

Redistribution of housing targets between Penzance and the rest of the CNA would allow for housing allocations having the greatest impact on the villages of Heamoor, Gulval and Long Rock to be deleted or limited in scale.

How would you change the plan so it is legally compliant or sound?

AMEND the plan

- to identify that the current distribution of housing between Penzance and the rest of the West Penwith CNA is not deliverable without an unacceptable impact on the villages of Heamoor, Gulval and Long Rock and, consequently,
- to reduce the target for allocated sites in the Penzance area to relate more closely to identified housing need and include an allowance for affordable led rural exception sites in appropriate villages across the CNA.

DELETE or reduce the scale of the proposed allocations in the villages of Heamoor, Gulval and Long Rock that would have most impact in terms of traffic, air pollution and flood risk, to achieve a more appropriate level of growth that can be integrated with the village communities.

AMEND the plan to ensure that any expansion of the urban area includes effective measures, such as green corridors and planted buffers, to maintain the individual and separate identities of Penzance, Newlyn, Heamoor, Gulval and Long Rock.

My comment relates to *(please select one)*:

Policy (site) (please provide the policy number you are referring to)	
Strategy text (please state the section you are referring to e.g. employment, housing etc.)	Green Infrastructure paras. 3.65 to 3.74 and Figure PZ4.
Evidence document (please note which document you are referring to)	

Your comment

The approach to Green Infrastructure in the Penzance chapter of the Allocations DPD is not sound; it is not positively prepared, justified or effective in responding to issues that are important to local people or taking forward relevant strategic policies in the adopted Local Plan.

The West Penwith CNA section of Cornwall Local Plan identifies two policy approaches to Green Infrastructure

- Maintain / enhance existing strategic green corridors to help preserve the identities of the communities that they separate; whilst also providing walking and cycling routes, ecological corridors, etc.; and
- Deliver new and improved public open space and green links as part of new developments to provide an enhanced range of recreational facilities, linking the town with the coast and the countryside and also help to deliver some of the sustainable transport objectives.

Para. 2.18.4 in the Site Allocations Document refers specifically to Green Infrastructure corridors that can provide green links, offering biodiversity and other benefits but also “a mechanism to maintain the separate identities of the various communities that make up an area, where appropriate”.

Maintaining the separate identities of Penzance, Newlyn, Heamoor, Gulval and Long Rock (as expressed in Aim 9 in the Document) is a key objective for local communities, especially for the villages of Gulval and Heamoor. This is an important element of the plan coming from early consultations which should be respected, and taken forward, in a meaningful way.

While this objective has been carried forward as an Aim, and recognised as a principle in para. 3.16 - “Any such (housing) extensions must be delivered sensitively, ensuring their design and location support the principle of maintaining the separate identities of the communities of Penzance, Newlyn, Heamoor, Gulval and Long Rock” - there is little else in the Document that carries it forward effectively.

There are existing green breaks, or corridors, that are of significant importance in maintaining the separate identities of the settlements referred to in Aim 9 – Newlyn Coombe; Trannack allotment field and adjacent footpath corridor on the eastern edge of Heamoor; Chy an Dour Coombe and the adjacent prominent ridge of farmland (Ponsandane farm) that separates Gulval village and Penzance urban area; Posses Lane between Gulval (Churchtown) and the commercial expansion of the town into Eastern Green; and Tolverth lane and recreational area on the western edge of Long Rock village.

These corridors were included in the former Penwith Local Plan as open areas of local significance and received strong community support. While it is recognised that those open areas have to be reviewed in the current context of an increased housing requirement, the separation between settlements was one of the functions of the open areas that could, and should, be carried forward in the new Local Plan, specifically the Site Allocations Document.

In preparing a Village Plan for Gulval the strongest aspiration of people in the village, through successive public consultation events, was to retain the separate identity of the village and to protect the physical and visual green breaks that are important to that individual character and identity.

Figure PZ4 in the Site Allocations document (Green Infrastructure) does not include these green corridors, despite their importance to local communities or relevance to Aim 9 in the Allocations Document and the approach to Green Infrastructure identified in the West Penwith Community Network Area section.

How would you change the plan so it is legally compliant or sound?

AMEND Figure PZ4 (Green Infrastructure) to reflect the approach set out in the West Penwith CNA section (para. 2.21) – to maintain/enhance existing strategic green corridors which help preserve the identities of the communities that they separate (Penzance/Newlyn/Heamoor/Gulval/Long Rock) whilst also providing walking and cycling routes, ecological corridors etc
by

1. Extending the green corridor in Newlyn Coombe to include the wider valley and Mount Misery as important to the separate identity of Newlyn whilst also enhancing the use of footpath links to open countryside in addition to the "Key habitat" corridor and existing/potential walking and cycling route shown;
2. Including the green corridor comprising the Trannack allotments field, the adjacent footpath corridor and an appropriate buffer (as identified in adopted Policy 25 clause 3 of the CLP Strategic Policies Document) on the eastern edge of Heamoor for its importance to the separate identity of Heamoor, and reflect this in the requirements for the proposed housing site (PZ H4);
3. Including the existing green corridor of Chy an Dour stream and Ponsandane Farm for its importance to the separate identity and individual character of Gulval village, as well as to the setting of Penzance, whilst also enhancing the ecological corridor along the stream and use of the existing walking and cycling route through Chy an Dour Coombe;
4. Linking the green corridor and existing/potential walking and

cycling route in Chy an Dour Coombe to the “enhanced green corridor” and proposed recreational site within the proposed housing allocation at Trannack (PZ H4), and through the allocation to link with existing footpaths into open countryside (so linking town, coast and countryside);

(Note: PZ4 currently shows a proposed walking/cycling route linking the Coombe with the open farmland to the south east of the allocation – nice views but going nowhere).

5. Extending (and amending) the “enhanced existing green corridor” at Posses Lane to include the wetland habitat and fields between Eastern Green (Jelbert Way) and Gulval Churchtown as being important to the separate identity of Gulval Churchtown as well as for biodiversity, potential for enhancing footpath/cycle links between coast, Gulval Churchtown and open countryside including Gulval Carn, Trevaylor, Tolver/Tremenheere Woods and St. Michael’s Way;
6. Include the green corridor comprising Tolverth stream and the recreational field on the western edge of Long Rock as important to the individual identity of Long Rock village, and as an “enhanced existing green corridor” and existing/potential walking and cycling route between the village and open countryside including Tolver/Tremenheere Woods and St Michael’s Way.
7. Include a green corridor or buffer to the east of a (smaller) housing allocation in Long Rock to maintain its village identity and clear separation from any additional employment allocation

My comment relates to *(please select one)*:

<p>Policy (site)</p> <p>(please provide the policy number you are referring to)</p>	<p>PZ- H2 Posses Lane</p>
<p>Strategy text</p> <p>(please state the section you are referring to e.g. employment, housing etc.)</p>	
<p>Evidence document</p> <p>(please note which document you are referring to)</p>	

Your comment

Proposal PZ H2 is not sound.

The Introduction to the Site Allocations Document (para. 1.1) states that "Creating healthy, sustainable and attractive communities for our residents represents a core component of Cornwall Council's strategy to make a positive difference to the quality of local residents' lives".

The proposed allocation of land at Posses Lane for housing will not make a positive difference to the quality of local residents' lives as a result of

- increase in traffic on to Posses Lane, to and through Churchtown as well as to Jelbert Way,
- negative impact on the important green corridor between Eastern Green and Gulval Churchtown,
- lack of integration with an existing residential area, and
- a poor quality residential environment with commercial uses and excessive security lighting immediately adjacent and a potential helicopter flight path overhead.

How would you change the plan so it is legally compliant or sound?

Delete Proposal PZ H2.

My comment relates to (*please select one*):

Policy (site) (please provide the policy number you are referring to)	PZ H3 Additional Policy requirements Gulval (Trevarrack)
Strategy text (please state the section you are referring to e.g. employment, housing etc.)	
Evidence document	

(please note which document you are referring to)	
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Your comment

We consider the additional policy requirements for safe pedestrian connections, between the proposed housing allocation in Gulval (Trevarrack) and Pendrea Road, Trevarrack Noweth (wrongly identified as Chynoweth Gardens) and the footpath to the north; the preference to provide land to deliver an open space on site; and the effective management of surface water on the site, to be sound and positively prepared in that the proposal now reflects and respects responses to consultation from the local community.

Provision within the site for at least part of the open space provision for Gulval is in line with the community's Village Plan and a long standing objective to provide a children's play space on this central and accessible site. A play space to serve the village, not just the development, could be included with a minimal increase in density (which would be in keeping with adjacent terraced housing, characteristic of Gulval). Provision on the north west boundary would help retain the open and attractive character of the footpath to the north of the site and, with planting, safeguard the privacy of adjacent dwellings. There is also potential for dual use of the surface water management area in the south west of the site for a small community seating space.

In view of potential developer or landowner objections to these requirements we ask that these comments are available to the Inspector.

How would you change the plan so it is legally compliant or sound?

We welcome the policy requirements and wish to see them retained, and implemented through the planning application process – in particular, the inclusion of open space and play space within the site to serve the village as a whole, new pedestrian links as proposed and no increase in the number of dwellings proposed. The local community would also like to see an emphasis on affordable led housing that is related specifically to housing need within Gulval village (defined as the polling district) through a planning agreement and cascade approach.

My comment relates to *(please select one)*:

<p>Policy (site) (please provide the policy number you are referring to)</p>	<p>PZ H11 Additional Policy requirements former Barn Club site</p>
<p>Strategy text (please state the section you are referring to e.g. employment, housing etc.)</p>	
<p>Evidence document (please note which document you are referring to)</p>	

Your comment

The proposed allocation of this previously developed site is supported. However, inclusion of a requirement for a footpath on the western boundary is not sound UNLESS it is linked to better traffic management and pedestrian safety measures for the rest of Trevarrack Lane (which leads to Gulval village and post office). There should be no expectation or encouragement for increased pedestrian use of the lane as it is which is narrow and hazardous.

How would you change the plan so it is legally compliant or sound?

Delete reference to the additional requirement to provide a footpath on the western boundary unless it is linked to traffic management and pedestrian safety measures along the length of Trevarrack Lane.

My comment relates to *(please select one)*:

<p>Policy (site) (please provide the policy number you are referring to)</p>	<p>PZ-H4 Trannack</p>
<p>Strategy text</p>	

(please state the section you are referring to e.g. employment, housing etc.)	
Evidence document (please note which document you are referring to)	

Your comment

The proposed allocation is of a scale that is totally inappropriate to Heamoor village. Development of this scale can only be justified by the housing requirement for Penzance and by being seen as an extension of the urban area.

There should be a clearer emphasis on linking it effectively to the town and town centre, including primary schools (Pensans and St. Mary's RC which are both closer than Heamoor Primary), Humphry Davy Secondary school which is closer than Mount's Bay, proposed Health Centre at St Clare etc. all of which can be accessed safely by walking and cycling via existing routes including the underpass from Treneere Lane to Manor Way.

Maintaining the separate identity of Heamoor village through inclusion of a buffer to enhance the existing green corridor (allotments and footpath) to the west of the site should also be a priority.

Pedestrian links on to Polmennor Road/Trannack Lane to the north should not be permitted – the lane is narrow in many places and is unsafe for pedestrians. Alternative safer routes are available. This attractive and historic rural route linking the villages of Gulval and Heamoor should be protected by ensuring existing hedgerows along the northern boundary of the site are retained and enhanced by a planted buffer between the site and open countryside (and as shown in Figure PZ4 – 'enhanced green corridor'). However, pedestrian use of this corridor should not be encouraged unless it is within the allocated site; pedestrian access to Trannack Lane should be limited to existing footpaths through the site together with improved access from Treneere and Chy an Dour Coombe.

Vehicular access to the site only from the A 30 as proposed, with no vehicular links to Trannack Lane/Polmennor Road to the north, is supported and must be ensured through the planning application process.

How would you change the plan so it is legally compliant or sound?

AMEND Proposal PZ H4 (additional requirements) and supporting text in paras. 3.43 and 3.44 to prioritise integration of the site with the town and town centre – in particular to emphasise safe pedestrian access via the existing crossing under the A 30 to Coombe Lane and Manor Way (as well as the additional pedestrian crossing points to be delivered on the A.30 (clause f)) and on to schools within the town, Truro and Penwith College, the proposed health centre at St Clare,

hospital, other facilities and employment opportunities.

AMEND Proposal PZ H4 (additional requirements) to include a planted buffer on the western boundary of the site to maintain the separate identity of Heamoor village in line with the approach to Green Infrastructure set out in the West Penwith Community Network Area section (para. 2.21) – to maintain/enhance existing strategic green corridors which help preserve the identities of the communities that they separate.

AMEND Proposal PZ H4 (additional requirements) to retain existing hedgerows along the northern boundary of the site/Polmennor Road/Trannack Lane and include additional tree planting as a buffer between the housing site and the rural character of Polmennor Road/Trannack Lane and open countryside beyond.

DELETE reference to pedestrian connections on to Polmennor Road (clause e)

My comment relates to *(please select one)*:

Policy (site) (please provide the policy number you are referring to)	PZ-H5 Polmennor Road, Heamoor
Strategy text (please state the section you are referring to e.g. employment, housing etc.)	
Evidence document (please note which document you are referring to)	

Your comment

This allocation is not sound. It is not positively prepared in terms of its impact on the existing Heamoor village community, particularly in view of existing traffic and flooding issues.

Development of this site will add to existing congestion, danger to

pedestrians and pollution in the centre of Heamoor village. It is also likely that traffic will increase on Polmennor Road/Trannack Lane to the east of the site, which is totally unsuitable for additional traffic, and so to the A 30, adding to the traffic through Gulval, especially on to the B3311 (St Ives road) where it is narrow and unsafe for pedestrians.

How would you change the plan so it is legally compliant or sound?

DELETE Proposal PZ H5

My comment relates to *(please select one)*:

Policy (site) (please provide the policy number you are referring to)	
Strategy text (please state the section you are referring to e.g. employment, housing etc.)	Infrastructure including Figure PZ4 (Green Infrastructure)
Evidence document (please note which document you are referring to)	

Your comment:

There is no clear relationship between the text (paras. 3.66 to 3.67) and the notations in Figure PZ4 Green Infrastructure. As a result the Figure is confusing and ineffective in presenting a clear green infrastructure strategy for the Penzance area.

The focus of the Penzance Neighbourhood Plan on the town centre and harbour area, rather than on community infrastructure across the town, as a whole, and surrounding villages, means that this aspect of the Local Plan (Allocations Document) is particularly important.

1. The meaning of "Key habitat green corridor", "Existing ecological resource" and "Enhanced existing green corridor" are not explained and bear little relationship to the supporting text.
2. The text (para. 3.67) should emphasise equally the importance of links from within the town to sites such as Trengwainton, Trevaylor and Tremenheere (Tolver) woods, not just from sites on the edge of the town.
3. Ponsandane stream and Chy an Dour stream are identified in the text as having biodiversity value which should be "protected, enhanced and managed positively"; however, neither river corridor is identified in Figure PZ4 by any related designation.
4. There is no "existing/potential walking/cycling route" linking Chy an Dour Coombe via a new crossing of the A.30 to the Trannack allocation (but there is a new route shown linking to nearby but unconnected farmland which appears to be an error)
5. Posses Lane to Trenow (Gulval) is shown as an "existing/potential walking/cycling route" connecting coast and countryside. While the principle is supported the route shown would involve increased use of Posses Lane, which should not be encouraged without effective traffic management and/or pedestrian safety measures, a new route across privately owned land, which is considered unnecessary and unrealistic, and the use of a very dangerous stile/exit on to the B3311 (Gulval – St. Ives road). at Keneggy which should be avoided not encouraged.
6. Activity focal points show some, but not all, primary schools in the town and omits Humphry Davy Secondary School in Coombe Road which is a focus for significant community use as well as school activity.

How would you change the plan so it is legally compliant or sound?

ADD TO para. 3.67 to explain the relationship between the values described and the notations in Figure PZ4, and emphasise the importance of green links from within the town as a whole to open

countryside/specific places not just from sites on the edge of the town, to provide a clearer and more positive basis for Green Infrastructure provision.

INCLUDE Chy an Dour stream and Ponsandane stream as key habitat or enhanced existing green corridors to reflect their biodiversity value.

INCLUDE a potential walking/cycling route linking Chy an Dour Coombe with the Trannack housing allocation (PZ H4).

AMEND the Posses Lane pedestrian/cycling route to be more relevant, realistic and safe.

INCLUDE the existing footpath along the eastern boundary of Ponsandane Field, together with a new route along its southern boundary linking to the B3311 by Ponsandane Care Home, as an existing/potential walking/cycling route which would link housing areas in Eastern Green and Gulval with the edge of Penzance and avoid the Branwell Lane/A30 roundabout.

INCLUDE all primary schools in the town, and Humphry Davy School, as Activity focal points.

If you require more space, please add more comment boxes following the same format above.

4. Duty to co-operate

Although comments relating to the duty to co-operate can't be amended at examination, if you think the plan doesn't comply we'd still like to know why.

5. Examination in public and further notification

If your comment(s) request a change; do you wish to speak at the oral part of the examination

No I do not wish to speak at the public examination

Yes I do wish to speak at the public examination

Please note even if you've selected that you wish to speak at the examination, the Independent Planning Inspector will decide who, if anyone, should speak publically. Even if you select No, your written comments will still be considered by the Inspector and given the same weight as verbal comments at a hearing session.

Further notification

Please let us know if you would like to be notified on either or both of the following:

The Independent Planning Inspector's published recommendations of the emerging Allocations DPD under section 20 of the Planning and Compulsory Purchase Act 2004

Yes No

The adoption of the Allocations DPD

Yes No

If you have answered Yes to either of the questions above and your preferred contact details differ to those already given, please enter the details below.

Please use this postal address to notify me

Please use this email address to notify me