

NOTE: Yellow highlighted box represents a summarised comment

Representor Reference Number and Name	Attend Inquiry Yes/No	Comment Type	Comment	Modification Comment	Officer Response
90h Sport England	No	Other	<p>Sport England along with Public Health England have launched our revised guidance 'Active Design' which we consider has considerable synergy the document. It may therefore be useful to provide a cross-reference (and perhaps a hyperlink) to <a href="http://www.sportengland.org/activedesign">www.sportengland.org/activedesign</a> . Sport England believes that being active should be an intrinsic part of everyone's life pattern.</p> <p>The developer's checklist (Appendix 1) has been revised and can also be accessed via <a href="http://www.sportengland.org/activedesign">www.sportengland.org/activedesign</a> Sport England would encourage development in Cornwall be designed in line with the Active Design principles to secure sustainable design. This could be evidenced by use of the checklist.</p> <p>We have recently launched a 2 minute animation to promote Active Design and a second film is in development. Both will be available via <a href="http://www.sportengland.org/activedesign">www.sportengland.org/activedesign</a></p>	<p>Add in a reference to Active Design to create the link with high quality design linked to health and well being. We advocate that you include a policy:</p> <p>The design and masterplanning of development proposals will embrace the role they can play in supporting healthy lifestyles by facilitating participation in sport and physical activity. To do so they will, as far as is relevant to the specific development proposal, adhere to the following Active Design principles</p> <ul style="list-style-type: none"> <li>• Activity for All Enabling those who want to be physically active whilst encouraging those who are inactive to become active.</li> <li>• Walkable Communities Creating the conditions for active travel between all locations.</li> <li>• Connected Walking, Running and Cycling Routes Prioritising active travel through safe integrated walking, running and cycling routes</li> <li>• Co-Location of Community Facilities Creating multiple reasons to visit a destination and minimising the number and length of trips and increasing the awareness and convenience of opportunities to participate in sport and physical activity opportunities</li> <li>• Network of Multifunctional Open Space Providing multi-functional spaces opens up opportunities for sport and physical activity and has numerous wider benefits</li> <li>• High Quality Streets and Spaces Well designed streets and spaces support and sustain a broader variety of users and community activities</li> <li>• Supporting Infrastructure Providing and facilitating access to facilities and other infrastructure to enable all members of society to take part in sport and physical activity</li> <li>• Active Buildings Providing opportunities for activity inside and around buildings, rather than just between buildings</li> </ul> <p><del>• Management and Maintenance A high standard of maintenance is essential to</del></p>	<p>A brief reference could be added to para 2.19 Design within the introduction of the DPD as a minor modification as follows: <u>Consideration should be given to proposals being designed in line with Sport England's 'Active Design' principles to secure sustainable design</u></p>
133 Education & Skills Funding Agency	No	Education	<p>The substantial growth in housing will place significant pressure on infrastructure. The LP will need to be "positively prepared" to meet infrastructure requirements.</p> <p>We welcome reference to support the development of appropriate social and community infrastructure, and within para 2.4 the commitment to on-going engagement with providers. Policy 28 of the LP:SP sets out the principle of developer infrastructure contributions being sought However, there is inconsistency in the DPD this requirement, under some town headings policies make it clear that development will contribute to the cost of meeting education needs (e.g. West Carclaze and Par Docks) but this is notably missing elsewhere. There is little detail on plan deliverability re education provision eg where school expansion is proposed. ESFA recommends modifications to provide greater consistency and certainty on the general requirement for development to contribute to the cost of education provision, cross-referencing to the IDP, CIL schedule and other relevant evidence. Without this, we have concern regarding the DPD's effectiveness &amp; soundness.</p> <p>Some proposed allocations require an onsite school. We recommend these policies require both the free transfer of land to the LEA and construction costs to be met by the developer; something which currently varies among policies. eg Bd-UE3 requires both land and a contribution towards school construction costs, but H-UE1 refers only to provision of land. If there is evidence to support such differences in approach, it should be clearly indicated. Allocations should include policy requirements for developer contributions towards education, whether by onsite schools with land and construction costs provided by the developer, or offsite contributions. There should be a clear rationale whether onsite or offsite contributions are required from individual sites, demonstrating the appropriate distribution of schools and school capacity around Cornwall's settlements, in accordance with principles of sustainable development. Policy requirements for education provision should be commensurate with the school places generated by growth, or provide evidence justifying the absence of these requirements. In addressing these points, the Council will be better able to demonstrate that the plan has been positively prepared, complies with national policy, and is justified &amp; effective in its education planning</p>	<p>ESFA recommends modifications to provide greater consistency and certainty on the general requirement for development to contribute to the cost of education provision, cross-referencing to the IDP, CIL schedule and other relevant evidence.</p>	<p>This representation raises a number of issues relevant to the approach that the DPD takes with regards to education provision throughout the wider document, not just the Saltash chapter. For the Council's response to these document wide comments please refer to the Document Wide Officer Response Sheets. <b>The Council recognises that there is an inconsistency in the Allocations DPD with regards to where policies set out a requirement for education contributions or remain silent on this. As recognised in the representation, Policy 28 of the LP:SP sets out the principle of developer contributions, so it is not necessary to replicate this within the Allocations DPD. So to provide consistency, the Council would be happy to remove policy references to education contributions, with the exception of where policies seek the development of new education facilities within the site, as it is important for this to be recognised from the outset for landowners / developers</b></p> <p><b>Where policies seek the delivery of a school on site, the Council is happy to add the requirement for the land and/or school to be transferred for free to the Local Authority. However, it is difficult to have a standard approach as to whether land AND an education contribution will be required, as there are many factors that could affect viability, what the land would be valued at as part of its contribution etc, which will in turn affect whether a financial contribution can be sought on top of the land; so it is considered that it would be better to do this at the application stage, where full costs / return for the project are known</b></p>
170 Stuart Holman	No	Vision, objectives & targets	<p>Paras 13.4 and 13.5 - Need to insert the five Strategic Targets stated in the (Local Plan) Community Network Areas Document for Saltash; together with targets for these to 2030.</p>	<p>Need to include the 2030 targets for each of the five Strategic Objectives but especially for Affordable Housing.</p> <p>Need specific detail on how Affordable Housing will be provided.</p>	<p>The Site Allocations Development Plan Document (DPD) will form one element of Cornwall's Local Plan and shouldn't repeat aspects contained within other elements of this; such as the Strategic Policies (Community Network Area Section).</p> <p>The Local Plan: Strategic Policies (LP:SP) sets out policies on how affordable housing will be delivered; with these policies being applied to planning applications. Also, the Affordable Housing Supplementary Planning Document (SPD) is currently being prepared which will provide detailed guidance on the issue of affordable housing because of the complexity around the ways it can be required and implemented.</p> <p>The Council does not consider it appropriate to repeat other areas Local Plan in the DPD.</p>
170 Stuart Holman	No	Economic Growth	<p>No mention of the importance of the small business and self-employed sectors so important to the local economy. Reference required to Local Plan policies to encourage and support these sectors especially low cost easy-in easy-out start-up/nursery premises, business hubs, and live/work studio accommodation in both urban and rural areas. Not everyone needs large expensive premises on industrial estate.</p> <p>No mention of developing the Renewable Energy sector in the town for generation sites and potential job creation.</p>	<p>Insert more detail on how the small business and self-employed sectors will be developed and especially low cost easy-in easy-out start-up/nursery premises, business hubs, and live/work studio accommodation in both urban and rural areas will be developed for young business people</p>	<p>The DPD presents planning policies for larger scale strategic sites. Planning policies for smaller scale employment development are addressed within the LP:SP.</p> <p>Also, the DPD focuses on providing suitable sites for housing and employment rather than focusing on developing particular sectors of the economy, such as renewables.</p> <p>The Council does not consider it appropriate to include more detail on how small business and self-employed sectors will be developed in both rural and urban areas in the DPD.</p>
170 Stuart Holman	No	Housing	<p>No reference to the need for Affordable Housing - It is referred to as a Key Objective for the area, but just stating that policies will "Enable the provision of affordable housing" is weak and meaningless. My friends and I have not registered for housing, because most of us live at home with our parents and do not all want to live in social housing on estates. We want low-maintenance homes. Most of us live in the rural part of the town and want access to a range of provision including :-</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> New easy to build DIY timber framed 1/2 bed studios, flats or apartments in rural areas, perhaps on farms with scope to expand them with extra bedrooms as time goes by;</li> <li><input type="checkbox"/> Self-build plots, schemes and development sites;</li> <li><input type="checkbox"/> Small scale live-work space for those wanting to set up small businesses e.g. cake making; micro brewery; software development; on-line trading; ecologist.</li> <li><input type="checkbox"/> Barn conversions</li> <li><input type="checkbox"/> Residential caravan sites;</li> <li><input type="checkbox"/> Small 1 or 2 bed apartments;</li> <li><input type="checkbox"/> Release of open space within the town for small-scale single storey modular timber homes.</li> <li><input type="checkbox"/> Are there other self-help affordable housing schemes available to help us?</li> </ul> <p>The closer to the railway station, town centre and leisure facilities the better. Few of us fancy living at Broadmoor Farm and want more choice and diversity. How many affordable homes will actually be required in the town by 2030 ?</p>	<p>Identify sites for self-build development including using appropriate small parts of green infrastructure land within the town and especially those close to public transport, the town centre or railway station.</p> <p>Identify site suitable for residential caravans, or chalets/lodges.</p> <p>Provide a target for the forecast number of affordable houses needed by 2030 and make sure the Plan is resourced to provide them.</p>	<p>The Saltash Housing Evidence Report sets out the limited scope of providing strategic site allocations (which the DPD focuses on) within the town. Smaller scale planning proposals would be addressed under the LP:SP or, where one exists, a Neighbourhood Development Plan (NDP). However it should be noted, that small parcels of public open space are often important to recreation, leisure, community use, townscape and landscape quality, visual amenity and wildlife; with such areas being protected under Policy 25 of the LP:SP.</p> <p>The DPD presents planning policies for larger scale strategic sites in the main towns for housing and employment, it does not consider site allocations for residential caravans or chalets/lodges, or smaller plots in rural areas.</p> <p>The LP:SP sets out policies on how affordable housing will be delivered with these policies being applied to the site allocations. The DPD should not repeat policies covered within other areas of the Local Plan (the DPD is one element of this).</p> <p>An Affordable Housing SPD is currently being prepared which will provide detailed guidance on the issue of affordable housing; this is required because of the complexity around the ways it can be required and implemented.</p> <p>The purpose of the DPD is not to provide assurance that affordable houses are resourced; the purpose of the DPD it is to identify strategic sites to meet the overall housing and employment targets set by the LP:SP.</p> <p>The Council does not consider it appropriate to make the proposed modifications.</p>

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170 Stuart Holman	No	Other	No mention of waste disposal, recycling or landfill sites. Are these needed through to 2030 ? Lots of valleys have been filled and are an eyesore. Also no mention of the importance of hi-speed Broadband – a vital factor for small on-line businesses.	Include references to waste disposal, recycling, green waste and land-fill issues. Include plans for higher-speed broadband and the network required to provide it.	Gas supply, internet and mobile technology are not specifics covered within the infrastructure sections of the DPD. Strategic Waste Management Principles are covered within Policy 19 of the LP:SP. The Council does not consider it necessary to make proposed modifications.
170 Stuart Holman	No	Transport Strategy	Why no mention of an electric charging point network around the town for electric vehicles and bikes. Plan for 2030 and the future !	Include details of where key recharging points should be sited e.g. railway station, town centre, waterfront, key activity centres, business parks, doctor's surgeries, Waitrose, Lidl etc.	The DPD focuses on presenting planning policies for larger scale strategic sites in the main towns for housing and employment. Policies and proposals for electric vehicle charging infrastructure are external to DPD (please see <a href="https://www.cornwall.gov.uk/transport-and-streets/pay-as-you-go-electric-vehicle-chargers/">https://www.cornwall.gov.uk/transport-and-streets/pay-as-you-go-electric-vehicle-chargers/</a> ). The Council does not consider it appropriate for the DPD to include details of where key vehicle recharging points should be sited throughout Saltash.
170 Stuart Holman	No	Implementing & Monitoring	You must include a target for the provision of small business space and affordable housing ! How can you possibly leave these out !	Include targets for the number of Affordable Housing units and amount of business space for small businesses to be built by 2030.	The DPD focuses on setting out where houses and employment land, to meet the key targets as set out by the LP:SP, should be accommodated. The LP:SP does not set out specific targets for the provision of small business space and affordable homes in Saltash over the plan period. The Council does not believe these additional targets are necessary in the DPD.
170 Stuart Holman	No	Education	No mention of nursery and pre-school provision so important to young families. How many exist in the town, where are they located, where should new ones be located. What is happening at Broadmoor Farm.	Include and acknowledge the importance of nursery and pre-school provision and the facilities required and where these should be located especially where on the Broadmoor development.	Nursery and pre-school provision are not specifics covered within the education infrastructure sections of the DPD. The Council does not consider it necessary to make proposed modifications.
170 Stuart Holman (pt 2)	No	The Strategy	Para 13.4 Inadequate reference to strategic policies for the Town set out in the Communities Network Area section. especially poor assessment on affordable housing provision  Para 13.7 Inadequate assessment on the impact of Plymouth and the emerging Plymouth and South Devon Local Plan Economic Growth. Inadequate assessment of the self-employed and small business sector and provision of suitable small scale business premises.	Unable to see any reference to the Plymouth and South Devon Local Plan. Saltash is a "suburb" of Plymouth and there is a total absence of how their Plan will impact on Saltash other than reference to a possible park and ride site. More detail needed on Economic issues and how Saltash can complement, compete or capitalise on the plans for this major city and surrounding area.	The DPD will form one element of Cornwall's Local Plan and shouldn't repeat aspects contained within other elements of this; such as the LP:SP (Community Network Area Section) or policies on how affordable housing will be delivered (e.g. LP:SP policy 8, which will be applied to the site allocations). In addition an Affordable Housing SPD is currently being prepared which will provide detailed guidance on the issue of affordable housing; this is required because of the complexity around the ways it can be required and implemented.  Saltash is not considered at suburb of Plymouth and the DPD works to accommodate growth set out by Cornwall's LP:SP as opposed to the Plymouth and South Devon Joint Local Plan. However, in addition to this representation, the Council has considered the representation submitted by Plymouth City Council, which concerned, in part, strengthening the Saltash Chapter of the DPD to greater reflect the positive relationship between Saltash and Plymouth and the cross boundary issues. A number of amendments to the Saltash Chapter can be considered as a result of Plymouth's representation (see above). The Council does not consider it necessary to make any modifications to the DPD as a result of this comment.
174 Emily Duckering	No	Vision, objectives & targets	Paras 13.4 and 13.5 - Need to insert the five Strategic Targets stated in the (Local Plan) Community Network Areas Document for Saltash; together with targets for these to 2030.	Need to include the 2030 targets for each of the five Strategic Objectives but especially for Affordable Housing. Need specific detail on how Affordable Housing will be provided.	The DPD will form one element of Cornwall's Local Plan and shouldn't repeat aspects contained within other elements of this; such as the LP:SP (Community Network Area Section).  The LP:SP sets out policies on how affordable housing will be delivered; with these policies being applied to planning applications. Also, the Affordable Housing SPD is currently being prepared which will provide detailed guidance on the issue of affordable housing because of the complexity around the ways it can be required and implemented. The Council does not consider it appropriate to repeat other areas Local Plan in the DPD.
174 Emily Duckering	No	Economic Growth	No mention of the importance of the small business and self-employed sectors so important to the local economy. Reference required to Local Plan policies to encourage and support these sectors especially low cost easy-in easy-out start-up/nursery premises, business hubs, and live/work studio accommodation in both urban and rural areas. Not everyone needs large expensive premises on industrial estate.  No mention of developing the Renewable Energy sector in the town for generation sites and potential job creation.	Insert more detail on how the small business and self-employed sectors will be developed and especially low cost easy-in easy-out start-up/nursery premises, business hubs, and live/work studio accommodation in both urban and rural areas will be developed for young business people	The DPD presents planning policies for larger scale strategic sites. Planning policies for smaller scale employment development are addressed within the LP:SP.  Also, the DPD focuses on providing suitable sites for housing and employment rather than focusing on developing particular sectors of the economy, such as the renewables sector. The Council does not consider it appropriate to include more detail on how small business and self-employed sectors will be developed in both rural and urban areas in this DPD.
174 Emily Duckering	No	Housing	No reference to the need for Affordable Housing - It is referred to as a Key Objective for the area, but just stating that policies will "Enable the provision of affordable housing" is weak and meaningless. My friends and I have not registered for housing, because most of us live at home with our parents and do not all want to live in social housing on estates. We want low-maintenance homes. Most of us live in the rural part of the town and want access to a range of provision including :- <input type="checkbox"/> New easy to build DIY timber framed 1/2 bed studios, flats or apartments in rural areas, perhaps on farms with scope to expand them with extra bedrooms as time goes by; <input type="checkbox"/> Self-build plots, schemes and development sites; <input type="checkbox"/> Small scale live-work space for those wanting to set up small businesses e.g. cake making; micro brewery; software development; on-line trading; ecologist. <input type="checkbox"/> Barn conversions <input type="checkbox"/> Residential caravan sites; <input type="checkbox"/> Small 1 or 2 bed apartments; <input type="checkbox"/> Release of open space within the town for small-scale single storey modular timber homes. <input type="checkbox"/> Are there other self-help affordable housing schemes available to help us? The closer to the railway station, town centre and leisure facilities the better. Few of us fancy living at Broadmoor Farm and want more choice and diversity. How many affordable homes will actually be required in the town by 2030 ?	Identify sites for self-build development including using appropriate small parts of green infrastructure land within the town and especially those close to public transport, the town centre or railway station.  Identify site suitable for residential caravans, or chalets/lodges.  Provide a target for the forecast number of affordable houses needed by 2030 and make sure the Plan is resourced to provide them.	The Saltash Housing Evidence Report sets out the limited scope of providing strategic site allocations (which the DPD focuses on) within the town. Smaller scale planning proposals would be addressed under the LP:SP or, where one exists, a NDP. However, small parcels of public open space are often important to recreation, leisure, community use, townscape and landscape quality, visual amenity and wildlife; with such areas being protected under Policy 25 of the LP:SP.  The DPD presents planning policies for larger scale strategic sites in the main towns for housing and employment, it does not consider site allocations for residential caravans or chalets/lodges, or smaller plots in rural areas.  The LP:SP sets out policies on how affordable housing will be delivered with these policies being applied to the site allocations. The DPD should not repeat policies covered within other area of the Local Plan (the DPD is one element of this).  An Affordable Housing SPD is currently being prepared which will provide detailed guidance on the issue of affordable housing; this is required because of the complexity around the ways it can be required and implemented.  The purpose of the DPD is not to provide assurance that affordable houses are resourced; the purpose of the DPD it is to identify strategic sites to meet the overall housing and employment targets set by the LP:SP.  The Council does not consider it appropriate to make the proposed modifications.
174 Emily Duckering	No	Other	No mention of waste disposal, recycling or landfill sites. Are these needed through to 2030 ? Lots of valleys have been filled and are an eyesore. Also no mention of the importance of hi-speed Broadband – a vital factor for small on-line businesses.	Include references to waste disposal, recycling, green waste and land-fill issues. Include plans for higher-speed broadband and the network required to provide it.	Gas supply, internet and mobile technology are not specifics covered within the infrastructure sections of the DPD. Strategic Waste Management Principles are covered within Policy 19 of the LP:SP. The Council does not consider it necessary to make proposed modifications.
174 Emily Duckering	No	Transport Strategy	Why no mention of an electric charging point network around the town for electric vehicles and bikes. Plan for 2030 and the future !	Include details of where key recharging points should be sited e.g. railway station, town centre, waterfront, key activity centres, business parks, doctor's surgeries, Waitrose, Lidl etc.	The DPD focuses on presenting planning policies for larger scale strategic sites in the main towns for housing and employment. Policies and proposals for electric vehicle charging infrastructure are external to DPD (please see <a href="https://www.cornwall.gov.uk/transport-and-streets/pay-as-you-go-electric-vehicle-chargers/">https://www.cornwall.gov.uk/transport-and-streets/pay-as-you-go-electric-vehicle-chargers/</a> ). The Council does not consider it appropriate for the DPD to include details of where key vehicle recharging points should be sited throughout Saltash.
174 Emily Duckering	No	Implementing & Monitoring	You must include a target for the provision of small business space and affordable housing ! How can you possibly leave these out !	Include targets for the number of Affordable Housing units and amount of business space for small businesses to be built by 2030.	The DPD focuses on setting out where strategic housing and employment sites to meet key targets (as set out by the LP:SP) should be accommodated. The LP:SP doesn't set out targets for the provision of small business space and affordable homes in Saltash over the plan period. The Council does not believe these additional targets are necessary in the DPD.
174 Emily Duckering	No	Education	No mention of nursery and pre-school provision so important to young families. How many exist in the town, where are they located, where should new ones be located. What is happening at Broadmoor Farm.	Include and acknowledge the importance of nursery and pre-school provision and the facilities required and where these should be located especially where on the Broadmoor development.	Nursery and pre-school provision are not specifics covered within the education infrastructure sections of the DPD. The Council does not consider it necessary to make proposed modifications.

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176 Saltash NP Steering Group	Yes	Introduction	Para 13.2 Some of the Key facts quoted are out-of-date and also need to be expanded to include the full relevant data available.	The data presented needs to be baselined to as recent a date as there is accurate information e.g. latest employment and housing need figures and an accurate number for houses built since the 2010 threshold and what are the remaining housing and employment demands?  The Neighbourhood plan to DPD relationship should be defined.	The data presented was the most recent at the time of publication.  Para 13.3 states: "An outline strategy for the town is set out on the following pages, together with allocated sites; for the more detailed strategy for Saltash please refer to the Saltash Neighbourhood Development Plan, which was in the process of being developed, at the time of writing."  The Council considers that Para 13.3 could be modified to read: "An outline strategy for the town is set out on the following pages, together with allocated sites; for the more detailed and local level strategy for Saltash please refer to the Saltash Neighbourhood Development Plan (NDP), which was in the process of being developed at the time of writing. Once made, the policies contained within Saltash NDP will form part of the Development Plan for the town, alongside the policies contained within this DPD".
176 Saltash NP Steering Group	Yes	Vision, objectives & targets	Paras 13.4 and 13.5 - Minor errors in text	13.4 Correct ref is to the CLP Community Network Area Sections document and PP17 within that. The DPD should quote the five objectives for Saltash in full to save the user needing to reference other documents.  13.5 There should be cross reference to CLP policy 3.1 as well.	The Council considers that Para 13.4 could be modified to read:  "13.4 The Cornwall Local Plan: Strategic Policies DPD (LP:SP) sets out housing and economic targets for Saltash the Plan period (2010 to 2030); whilst five Strategic Objectives for the wider Cornwall Gateway CNA (which Saltash forms part of) are presented in full within PP17 of the LP:SP Community Network Area Sections and relate to issues such as the regeneration of Saltash town centre; provision of affordable housing; and the enhancement of jobs and services etc."  The Council considers further reference to policies of the LP:SP unnecessary. The DPD will form one element of Cornwall's Local Plan and shouldn't repeat aspects contained within other elements of this (such as LP:SP, Policy 3).
176 Saltash NP Steering Group	Yes	The Strategy	Paras 13.6 - 13.10 - No mention made of the role of the Neighbourhood Plan also minor text issues	Greater clarity is needed on what is dealt with in the DPD and what in the NDP.  13.7 suggest change from "particularly" to "Such as" its waterfront location  13.10 suggest change "is" to "are" recognised	Saltash NDP has not yet been made and, until such time that it is, it would be inappropriate for the DPD to refer to emerging proposals within this.  Para 13.3 currently states: "An outline strategy for the town is set out on the following pages, together with allocated sites; for the more detailed strategy for Saltash please refer to the Saltash Neighbourhood Development Plan, which was in the process of being developed, at the time of writing."  The Council considers that:  Para 13.3 could be modified to read: "An outline strategy for the town is set out on the following pages, together with allocated sites; for the more detailed and local level strategy for Saltash please refer to the Saltash Neighbourhood Development Plan (NDP), which is in the process of being developed at the time of writing. Once made, the policies contained within Saltash NDP will form part of the Development Plan for the town, alongside the policies contained within this DPD".  Para 13.7 could be modified to change "particularly" to "such as"  Para 13.10 should be modified to read "...are recognised."
176 Saltash NP Steering Group	Yes	The Strategy	Fig Slt1. There is a lack of clarity on policy referencing, esp for green spaces. The identification of key strategic green spaces is inconsistent e.g. the playing field area at Chapelfield is not "greened in"	Review diagram to include identification of all relevant strategic open spaces	The Green Infrastructure Strategy represents the interim position and Cornwall Council is committed to developing the PERFECT Interreg Project (Planning for Green Infrastructure) which will go into the next level of detail for the main towns.  In this instance, the Council is happy to identify the playing field area at Chapelfield on the relevant maps in the Saltash Chapter of the DPD.
176 Saltash NP Steering Group	Yes	Economic Growth	Para 13.11 Poor phrasing – This paragraph should be rewritten	Poor phrasing – This paragraph should be rewritten to say that to support greater sustainability and reduce need to travel, there is a need for Saltash to provide additional employment opportunities, so increasing the opportunity for residents to both live and work within the town In sentence beginning "This relationship"...suggest change add "Whilst" at beginning and Saltash "not unlike" to "like". The Plymouth and SW Devon Joint Local Plan to 2034 should be identified as a significant input	In addition to this representation, the Council has considered the representation submitted by Plymouth City Council (see below), which concerned, in part, strengthening the Saltash Chapter of the DPD to greater reflect the positive relationship between Saltash and Plymouth and the cross boundary issues. As a result, the Council has suggested it would be acceptable to amend para 13.11 as follows:  "13.11 Saltash has a close and positive relationship with the city of Plymouth, immediately to the east of the town. This relationship presents significant opportunities and benefits to the community of Saltash (for example shopping, leisure and health facilities, high value employment opportunities, further and higher level education). Nonetheless, Saltash still strives to provide additional employment opportunities within the town, to increase the opportunity for residents to both live and work within the town, in order to create a sustainable local community."
176 Saltash NP Steering Group	Yes	Economic Growth	13.12 There is clumsy phrasing, in this paragraph what does it mean? The issues of "small businesses" should be referred to.	Proximity to A38 is not the only reason for safeguarding Employment land In particular the phrase "in turn represents the most commercially attractive for employment," is unclear. The support needed for the number of small businesses spread throughout Saltash should be identified. This paragraph should refer to CLP Policy 5.4	The Council considers that Para 13.12 could be modified to read:  "13.12 The proximity of the A38 to the town represents a key asset for the town to exploit. Land in close proximity to this represents the most commercially attractive for employment, particularly industrial, development, which is highlighted by the location of the town's existing industrial estates. As a result, land will be prioritised for employment use that is within easy reach of the Strategic Road Network, as well as safeguarding existing employment sites with good access to this, in accordance with LP:SP Policy 5."  The DPD focuses on setting out where strategic employment sites to meet key targets (as set out by the LP:SP) should be accommodated. The DPD does not address town wide provision for small businesses; such proposals would be in accordance with LP:SP policies; or there is an opportunity for Saltash NDP to cover this in further detail (for instance proposing local sites for small businesses).  The Council considers further reference to policies of the LP:SP unnecessary. The DPD will form one element of Cornwall's Local Plan and shouldn't repeat aspects contained within other elements of this (such as LP:SP, Policy 5).
176 Saltash NP Steering Group	Yes	Economic Growth	13.14 Why is SLT-E1 referred to as Stoketon Cross and not as part of the Broadmoor Urban Extension?	It would make a stronger sustainability justification if the two were dealt with as a package. Linkage between the two is a specific requirement in the overall concept	The DPD presents SLT-E1 separate to SLT-UE1 as the focus on this site SLT-E1 is employment development. It's important to define the area where employment development should take place rather than providing opportunity for alternative uses to be proposed on this land. The fact that two policies are proposed for sites adjoining each other does not undermine delivery of links between them and this aspect is picked up within each Policy.  The Council does not consider it necessary to include Policy SLT-E1 as part of a wider combined policy for SLT-UE1 & SLT-E1.
176 Saltash NP Steering Group	Yes	Retail Growth	13.16 This is now out of date. Tesco not now building and the PP expired 16/1/2017.	The policy justification for assuming that retail is the right thing to do on the site needs to be explained. Any new or changed planning proposal, needs to consider the sequential development test requirement and the potential effect on Town Centre and changes to resulting transport issues The current retail strategy needs review.	Planning permission (PA10/04741) has a Certificate of Lawfulness granted (Ref: PA17/01314) and therefore the permission referred to has not expired and is extant. The DPD does not allocate sites where there is an existing planning permission in place.  The Council does not consider any further amendment to the DPD necessary.
176 Saltash NP Steering Group	Yes	Retail Growth	If Tesco floorspace is added back into the Retail Study figures, then the need is now for 3,700 SqM net convenience floorspace. That is significant and therefore the whole issue of allocating for retail should be re-opened, either in the DPD or NDP. There is a case to be explored for finding at least part of this allocation in the town centre for sustainability and impact reasons.	Retail requirement should be reviewed	Planning permission (PA10/04741) has a Certificate of Lawfulness granted (Ref: PA17/01314) and therefore the permission referred to has not expired and is extant.  The Council does not consider any review of the retail strategy for Saltash to be necessary.
176 Saltash NP Steering Group	Yes	Retail Growth	13.18 This is agreed, but needs to have policy status to ensure it is properly capable of implementation? This is intended to be in the NDP. And if this is controlled to restrict TC impact, as 13.18 2nd sentence says, then surely the case to reopen the debate on the Sandford site is correct? Also infrastructure and transport implications of concentrated large retail facilities need to be considered.	Infrastructure and transport implications of concentrated large retail facilities need to be considered (see comment).	Planning permission (PA10/04741) has a Certificate of Lawfulness granted (Ref: PA17/01314) and therefore the permission referred to has not expired and is extant.  The Council does not consider any review of either the retail strategy for Saltash of the policy provision in SLT-UE1 to be necessary.
176 Saltash NP Steering Group	Yes	Retail Growth	Document flow needs improving	Suggest swap 13.18 and 13.19 to maintain the document flow	The Council does not consider the proposed modification to be necessary.

Representor Reference Number and Name	Attend Inquiry Yes/No	Comment Type	Comment	Modification Comment	Officer Response
176 Saltash NP Steering Group	Yes	Housing	13.20 Clumsy logic, needs simplifying.	Suggest that text says that Basically as there is not enough space within the urban area the majority of new housing will need to be in an urban extension to Saltash	The Council does not consider the proposed modification to be necessary.
176 Saltash NP Steering Group	Yes	Housing	13.21 Figures presented are out of date	Latest available figures should be presented	The data presented was most recent at the time of publication. The Council does not consider the proposed modification to be necessary.
176 Saltash NP Steering Group	Yes	Housing	13.23 This fails to reference employment needs, and is therefore not sustainable within the terms set out.	Should emphasise that it comes forward as part of an Urban extension including substantial new employment area ('Stoketon Cross') and is close to existing employment areas.	All of the policies presented within the DPD have been subject to a Sustainability Appraisal. The Council does not consider proposed modifications are required.
176 Saltash NP Steering Group	Yes	Education	13.27 As pre-school education is now tantamount to a statutory requirement, should there not be consideration for the needs of this sector? Also infrastructure to support Specialist and Safeguarding needs? Is there a Cornwall Education statement on the current and future requirement	Add relevant information and guidance	Nursery and pre-school provision and specialist and safeguarding needs are not specifics covered within the education infrastructure sections of the DPD. The education section of the Saltash chapter of the DPD sets out a current statement on future education requirements in the town. The Council does not consider it necessary to make proposed modifications.
176 Saltash NP Steering Group	Yes	Healthcare	13.30 There is no mention of dental, Community Hospital, Disability Services requirements More detail is required on what is needed to support existing and future need	Relevant information and guidance should be included	Dental, Community Hospital, Disability Services are not specifics covered within the DPD. The Council does not consider it necessary to make proposed modifications.
176 Saltash NP Steering Group	Yes	Utilities	13.33 Very skimpy, no mention of Surface Water Drainage, Water supply or Gas. More detail needed on what is needed to support existing and future need Is the sewage comment true as other different statements have been made? The DPD should reflect the Cornwall Infrastructure needs assessment for Cornwall Gateway There is no mention of the Broadband needs of businesses in Saltash	Would be better arranged as 1. Waste water Treatment, 2. Foul Drainage, 3. Surface Water Drainage, 4. Tidal Drainage, 5. Water Supply, 6. Energy (Gas - Electricity), More detail needed on what is needed to support existing and future need and reference to Infrastructure need document Emergency Service Support requirement statement needed e.g. access envelopes for existing and future equipment (also see below).	A Strategic Flood Risk Assessment of all sites proposed within the DPD has been carried out. This is available as part of the supporting evidence base at www.cornwall.gov.uk. Gas supply, emergency service provision, internet and mobile technology are not specifics covered within the infrastructure sections of the DPD. The Council liaised with SWW in preparing the strategy text. Since the close of the consultation the Council has re-engaged with SWW who has confirmed that growth for both south east Cornwall and Plymouth is factored into their assessment of future capacity. SWW has confirmed that proposals are being progressed which is in line with the existing strategy text. The Council does not consider it necessary to make proposed modifications.
176 Saltash NP Steering Group	Yes	Transport Strategy	13.35 There are elements within this that will need Planning Policy to implement - for example to ensure that new development builds in the on and off site requirements - but is not particularly apparent. Is this something for the NDP to do? There are no comments about connectivity in mapping needs to be there is also a need for pollution minimisation strategies. Multi modal transfer structure in NP not visible in DPD China Fleet Club is a major leisure destination but no cycle or pedestrian links to the site are identified in the mapping	Add connectivity needs in mapping and pollution minimisation strategies. Multi modal transfer structure in NP needs to be visible in DPD Existing non vehicular links should be identified	Delivery of required transport infrastructure (for example ensuring appropriate on and off site requirements) is covered by higher level policies and so the NDP does not have to cover this. The transport strategy maps indicates planned connections. The Council does not consider further illustration necessary. A pollution minimisation strategy is not considered an appropriate addition to the DPD. Connecting Cornwall and the local level transport strategy for Saltash aim to increase the use of sustainable modes of travel across all towns, thereby contributing to a reduction in pollution. Unclear as to what a multi-modal transfer structure in NP is? The transport strategy map is a high level strategy map; it is difficult to identify all small scale links on this. The Council does not consider it necessary to make proposed modifications.
176 Saltash NP Steering Group	Yes	Transport Strategy	13.36 Currently bus times are more flexible than train times which affects their relative take up.	N/A This is just a clarification	Noted.
176 Saltash NP Steering Group	Yes	Other	Emergency Services not referenced - are they adequate, are there any improvements that could be enabled through Planning Policies? Access arrangements must allow access for foreseeable future needs or is regarded as an NP issue Any additional fixed building requirements for Emergency Services should be identified or the fact that there is no need	Add relevant information	Provisions for emergency services are not specifics covered within the DPD. This issue could be explored further as part of the work towards the towns NDP. The Council does not consider it necessary to make proposed modifications.
176 Saltash NP Steering Group	Yes	Transport Strategy	13.43 Park and ride. Why is it needed what area or town(s) is it intended to serve and where will the terminus be located?	This requires investigation for Saltash's sustainability and future growth affecting existing plans and a statement of the likely impact and required location policy or guidance to be part of the integrated transport plan for Saltash e.g. Rail Station, Town Centre and Waterside.	It should be noted that a Park and Ride is not required in order to accommodate the growth set out by the LP:SP up to 2030. A future Park and Ride would offer a service between South East Cornwall and Plymouth (feasibility studies yet to be carried out and at this stage no location for a Park and Ride has been determined). Following the representation from Plymouth City Council (see representation and officer responses below), it should be noted that the Council is willing to enhance the reference to future joint working with Plymouth in order to further investigate this area of work at para 13.43(44): "Cornwall Council will continue to work with Plymouth City Council to identify opportunities for managing existing and future demand for travel between Plymouth and South East Cornwall in a sustainable way. The commitment to this joint working is demonstrated by Cornwall Council and Plymouth City Council jointly commissioning in 2017 a South East Cornwall and Plymouth Travel Demand Study, investigating the potential and possible options for effectively and efficiently managing travel demand along the strategic A38 transport corridor across the Tamar. Future improvements could include a western corridor Park and Ride facility and improved cycling infrastructure to serve both the communities of Cornwall and Plymouth."
176 Saltash NP Steering Group	Yes	GI Strategy	13.44-13.55 Generally there are lots of conclusions and some of the sites on the strategic map are referenced to this section, but there is no Planning Policy to make it explicit and implementable. Is this role for the NDP? By implication the football Ground at Chapelfield is not strategic? Other areas not identified and should be cf. "Open space document" as listed in 13.47	Include other areas identified cf. "Open space document" as listed in 13.47 And showing more detail of the Broadmoor and Stoketon Cross Layout will give more clarity on the open space provision being provided and should link with DPD identified green corridors.	LP:SP Policy 25 sets out planning policy regarding Green Infrastructure and a Biodiversity SPD and Open Space Standards SPD are currently being prepared by Cornwall Council (CC). There would not be a need for the Saltash NDP to repeat any policy content included within the LP:SP or the DPD, but it may wish to refer document user to these and/or either of the SPD's once these are prepared. The Green Infrastructure Strategy represents the interim position and Cornwall Council is committed to developing the PERFECT Interreg Project (Planning for Green Infrastructure) which will go into the next level of detail for the main towns. In this instance, the Council is happy to identify the playing field area at Chapelfield on the relevant maps in the Saltash Chapter of the DPD. The Council does not consider any further amendments necessary.
176 Saltash NP Steering Group	Yes	GI Strategy	13.53 Statement made is too vague for enforcement	Should say arrangements MUST be made and guidance given on acceptable options	Para 13.53 is supporting text and not Policy Wording and so therefore it should be noted that this text is not enforceable. The flexibility in this statement reflects the approach in LP:SP Policy 25, where criteria 6 says that "(Development proposals should contribute to an enhanced connected and functional network of habitat, open spaces and waterscapes by) (6) providing clear arrangements for the long-term maintenance and management and/or enhancements of the green infrastructure assets". The DPD must follow the approach in the LP:SP and so cannot, for instance, require that a developer put financial arrangements in place. The Council does not consider any further amendments necessary.
176 Saltash NP Steering Group	Yes	GI Strategy	13.56 Better located with the main infrastructure section. The requirements need to be (and will be) reflected in NDP Planning Policy. Does this document take account of latest advice including possible higher ranges of rainfall and tidal levels? Climate change predicted demand has recently been significantly increased	Confirm updated requirements have been identified and incorporated within document together with updating methodology as criteria are changed through the plan life.	LP:SP Policy 26 sets out planning policy regarding Flood Risk Management and Coastal Change. There would not be a need for the Saltash NDP to repeat any policy content included within the LP:SP or the DPD. All sites proposed for new development within the DPD have satisfied a Strategic Flood Risk Assessment. The Council considers the proposed modification unnecessary.
176 Saltash NP Steering Group	Yes	Other	General comment - many of the statements made (including those specifically identified above) are too vague to provide guidance for monitoring and / or enforceability.		The only wording within the DPD that will be enforced is the Policy Wording which the Council considers to be satisfactory.

Representor Reference Number and Name	Attend Inquiry Yes/No	Comment Type	Comment	Modification Comment	Officer Response
118 Saltash Community Flood Forum	Yes	Utilities	There appears to be outdated and incorrect information in section 13.33, namely that "sewage is piped across the Tamar Bridge" and that "South West Water is investigating the delivery of a new treatment works on the edge of Saltash.....which will have a 3-4 year lead in time". The reality is that Saltash sewage is piped underneath the Estuary (directional drilled) from Brunel Green to Ernesettle Sewage Treatment Works and South West Water is no longer investigating, let alone planning, a new treatment works in the short to medium term. Since a strategy to cater for the growth within the Saltash catchment is still under development, we fail to see the relevance of "no developer contributions.....for this strategic infrastructure". The Ernesettle Sewage Treatment Works will be enhanced and since the capacity of the 560mm transfer pipeline is finite, the methodology for Saltash will probably be limited to the installation of attenuation storage tanks on the sewerage network	This part of the plan needs to be altered to reflect the information above which has been provided to the Saltash Community Flood Forum by South West Water.	The Council liaised with SWW in preparing the strategy text. Since the close of the consultation the Council has re-engaged with SWW who has confirmed that growth for both south east Cornwall and Plymouth is factored into their assessment of future capacity. SWW has confirmed that proposals are being progressed which is in line with the existing strategy text.
118 Saltash Community Flood Forum	Yes	GI Strategy	13.45 - Our climate is changing and we expect average temperatures to increase and the fluctuations between hot, cold, wet and dry periods and the intensity of weather events also to increase within the plan term.  The Saltash Community Flood Forum anticipates that environmental problems associated with future housing development will become evident gradually over time, in correlation with the scale and pace of development. The current economic climate dictates that whilst the desire to develop areas is in place, the means by which these developments will be achieved is not. Therefore, investment for development will build slowly, just as baseline temperatures will increase gradually, in line with greenhouse gas emissions and other positive feedback factors that are an inevitable consequence of continued development not just locally but globally. <b>The terminology used in relation to green infrastructure in this document is heavily rooted in exploitation which is inconsistent with the Statements of Community Involvement where respect for the planet is highlighted.</b> There is an inherent risk in assuming that a small number of natural features can be utilised to solve myriad environmental problems and climate impacts.	We observe in 13.45 the use of the phrase 'where applicable' which allows for some retrenchments based on any ambiguous features on development. We request that this phrase be removed as all green infrastructure, is naturally multi-functional and helpful in attenuating flooding and the more there is, the more resilient the area will become.	The Council does not consider it appropriate to remove 'where applicable' from Para 13.45; the statement it relates to concerns not only flood attenuation and benefits for biodiversity but also public rights of way. Whilst the intent for provision is that it is multifunctional, this won't always be realistic (for example, it may be possible to accommodate green infrastructure for biodiversity but not as a public right of way).
118 Saltash Community Flood Forum	Yes	GI Strategy	The Sustainability Appraisal states regarding biodiversity: "The key messages signify the importance of the need to conserve, restore and enhance biodiversity in the county. Connectivity between habitats and space is needed to allow species to adapt to climate change. The value of biodiversity should be considered and recognised as a key element in the location and nature of new development." We observe in 13.47 the use of the phrase 'where possible' in respect of the protection and enhancement of biodiversity which is inconsistent with the indication of need in the Sustainability Appraisal.	We request that the phrase "where possible" is removed from section 13.47 on the basis that areas that already require protection should indeed be protected. We do accept that enhancements may not always be possible and so this should be made clear through re-drafting of 13.47 to reflect the need to protect and the desire to enhance.	Biodiversity is one consideration in planning and whilst all efforts will be made to achieve a gain for nature, or at worst no net loss, this can't always be guaranteed as there may be some instances when the overall benefits of development outweigh the impacts on biodiversity.  The Council considers it appropriate to alter the first sentence of Para 13.47 to read " <u>The protection and enhancements of biodiversity opportunities is a key principle of good green infrastructure.</u> "  The Council could insert an additional paragraph to this section: " <u>CC's Biodiversity Supplementary Planning Document (SPD) is currently being produced. This sets out a new approach by Cornwall Council for achieving a gain for nature, or at worst no net loss, within development sites. Further details can be found at <a href="http://www.cornwall.gov.uk">www.cornwall.gov.uk</a>.</u> "
118 Saltash Community Flood Forum	Yes	GI Strategy	The statement of community involvement describes the planning system as having three themes, one of which is sustainable development (meeting present needs and allowing for future needs). It also states, "We design, plan and build with respect for our planet." In the time it has taken to create this draft document there has been a step-change in the frequency of extreme weather events, in particular a substantial increase in the frequency of heavy and sustained rainfall and associated surface water flooding. For Cornish communities to remain sustainable these impacts must be taken into account and the importance of the natural environment in ameliorating the worst effects of climate change must be acknowledged. We therefore believe the current plan is ineffective in this regard. Section 13.5 is both in conflict with the sustainable development goals and also sections 13.23 and 13.26. The proposed Broadmoor development will be on land that, from the perspective of the Saltash community is predominantly existing open space and therefore the utmost care should be taken to allow as much of that space to remain open and multi-functional from both an ecological and healthy community perspective. This is in line with the European Commission's goal to introduce a policy of no net land take by 2050 to limit the negative impact of sealed surfaces and development in general. There is also an existing commitment in the UK to ensure that 60% of housing and urban development is confined to previously developed land.	Regarding 13.5, the provision for open space which will be predominantly allocated for 'public sport' and therefore less useful in environmental terms, will in total be equivalent to less than four full-size football pitches. This appears to be in conflict with section 13.23, which states: "...with Broadmoor located on the opposite side of the A38 to the majority of the town, it is important that the site creates a new neighbourhood, containing services and facilities that are easily accessible for its residents; such as public open space...", which we would interpret to mean more than three sports pitches, a below-minimum standard area of allotment space, and a small quantity of dispersed parkland. The allocation is only just over half the 91 square metres per dwelling expected in the section headed Saltash Site Allocation Policies. Please rectify to provide the full allocation of 91 square metres per dwelling to fit with the intention to build a new neighbourhood. Should it be assumed that implicit in the plan, is making up the shortfall through allocation of private gardens over which there is no control, and transit routes for cycles, walkers, and vehicles, with varying amounts of 'screening' at each side, this is a) unacceptable to the Saltash community Flood Forum and b) makes it difficult to see how future flooding incidents could be avoided. It also places an unacceptable amount of pressure on existing green spaces in other parts of Saltash will increase to a level that degrades them beyond their ability to ameliorate environmental impacts or support biodiversity, in line with sustainable development goals. In the event that the 91 square metres is to be created as suggested above, to make the plan effective we request that as a minimum, in line with section 13.26, the corresponding requirement to contribute to enhancements of existing local space be applied unilaterally across all developments. Special care and attention must be paid to the traditional features of the Broadmoor area in line with the supplementary planning document on Biodiversity which should be highlighted in section 13.5 and landscape character assessment document, which identifies Broadmoor Wood, a Biodiversity Action Plan woodland as, "a wildlife site which provides very distinctive and dominant feature to this cell" [cell 1. In the Landscape Character assessment document]. The Broadmoor area achieves an amber rating and also contains "Larger than average field boundaries made of mainly mature trees or dense hedgerow traditional species except along the north-west boundary which is low and clipped". These features should be protected and enhanced along	Saltash Housing Evidence Report sets out that it is not possible to accommodate the required growth at Saltash within the existing urban area and so a new urban extension is required; with the most suitable location for this being at Broadmoor.  Criteria 2(h) of Policy SLT-UE1 states that at design stage policies must "provide at least 91sqm of public open space per dwelling on site, in line with the Saltash Green Infrastructure strategy..". Therefore the Council does not consider any modification is required.  The policies of the DPD don't work in isolation and policy provisions set out within other areas of Cornwall's Development Plan will also apply to proposals on this site (e.g. LP:SP policies 23 (natural environment); 25 (green infrastructure); and 25 (flood risk management and coastal change)). The Council considers it unnecessary to make modifications which would cover aspects covered elsewhere in Cornwall's Development Plan. In addition, the DPD focuses on site allocation policies, it is inappropriate to include a policy which covers open space requirements across all developments in Saltash; general policies are covered within the LP:SP.  The Council could insert an additional paragraph below para 13.48 (which is considered to be more appropriate than at Para 13.50): " <u>CC's Biodiversity Supplementary Planning Document (SPD) is currently being produced. This sets out a new approach by Cornwall Council for achieving a gain for nature, or at worst no net loss, within development sites. Further details can be found at <a href="http://www.cornwall.gov.uk">www.cornwall.gov.uk</a>.</u> "  In addition to policy provisions in the LP:SP, Criteria 2(i) of Policy SLT-UE1 states that at design stage policies must "ensure the protection of Broadmoor Wood and Ball Wood (CWS designated site) together with all potentially affected steams, such as Latchbrook and its tributaries", whilst flood attenuation are addressed within policy criteria (i) and (j). Therefore the Council does not consider any modification is required with regard to these aspects and neither does it consider it reasonable to include a requirement to preserve and enhance field boundaries in the Broadmoor site.
118 Saltash Community Flood Forum	Yes	GI Strategy	Future Cornwall theme 3, objective 6., seeks to "Promote development that contributes to a healthy population - by implementing the Green Infrastructure Strategy and ensuring that environmental quality and air quality is protected and improved." It is a concern to the people of Saltash that earlier housing developments have not made suitable arrangements; financial and managerial, to manage public open spaces and flood attenuation schemes into the future after the initial development phase.	We request the removal of the phrase "it would be expected" from the beginning of section 13.53 as this is inconsistent with the intent expressed in Future Cornwall, theme 3, objective 6.	The Council does not consider 13.53 to be inconsistent with Future Cornwall theme 3, objective 6 (to promote development that contributes to a healthy population - by implementing the Green Infrastructure Strategy and ensuring that environmental quality and air quality is protected and improved). The DPD sets out a GI Strategy for Saltash, a Transport Strategy and policy provisions which aim to protect the environment and increase the use of sustainable modes of transport.  The flexibility in Para 13.53 reflects the approach in LP:SP Policy 25, where criteria 6 says that "(Development proposals should contribute to an enhanced connected and functional network of habitat, open spaces and waterscapes by) (6) providing clear arrangements for the long-term maintenance and management and/or enhancements of the green infrastructure assets". The DPD must follow the approach in the LP:SP and so cannot, for instance, require that a developer put financial arrangements in
118 Saltash Community Flood Forum	Yes	GI Strategy	Paragraph 13.56 refers to the past and future tidal flooding of Saltash Pier, Town Quay, Forder village and Antony Passage areas of Saltash. These are documented in Cornwall Strategic Flooding Risk Assessment level 1. Paragraph 13.56 states that "The improvement of flood defences is being considered". The Cornwall Strategic Flooding Risk Assessment Level 2. States: "Based on the findings of the SFRA Level 1, more detailed Level 2 assessments are currently being undertaken for areas of identified flood risk where there are pressures for development. Once these assessments are completed they will be added to this website." The Saltash Community Flood Forum group have previously drawn the attention of Cornwall Council to the potential increasing costs of climate change induced tidal flooding and have, initially, offered suggestions to protect the tidal creek and infrastructure at Forder - similar work having been carried out in other areas of Cornwall. Without showing intent to deal with these issues we find that this document is inconsistent with the statement in the sustainability assessment: "The key messages from the reviewed PPSIs stress the importance of taking account of flood risk, coastal change, water quality and water consumption in the plan Flood risk is one of the key issues to be considered in the location of development and the plan should be informed from an early stage by the Strategic Flood Risk Assessment and Shoreline Management Plans, taking account of the impact of climate change. The requirements of the Water Framework Directive provide an opportunity to improve, monitor and assess the condition of the water environment at a local scale."	Whilst we acknowledge that the Cornwall Strategic Flood Risk Assessment is intended to be a 'living document', it is important to indicate a point of contact for ongoing level 2. Assessments, the details of statutory consultees and a time scale in which we may expect reports on viable options to be published, bearing in mind the commitment to be informed from an early stage.	The Strategic Flood Risk Assessment 2 did not identify any of the proposed development sites in Saltash to be within Flood Risk Zones 2 or 3. All sites are in Flood Zone 1 and so standard procedures apply with regard to detailed flood risk assessments and drainage strategies through the detailed planning process.  The issue of flood defence and coastal protection outside of proposed allocation zones is Cornwall-wide and not specific to the allocations DPD. Cornwall Council is in the process of undertaking a new strategic assessment of flood risks across Cornwall with a view to informing an investment plan to help fund and implement schemes through Defra's Flood Defence Grant in Aid process.  The Shoreline Management Plan (SMP) for Cornwall and the Isles of Scilly (Rame Head to Hartland Point) was reviewed in 2016. However, in line with a coastal cell approach, Saltash comes under the adjoining SMP for West Devon and Dorset (Durlston Head to Rame Head). This SMP is currently undergoing review.  The Council does not consider any amendments to the DPD appropriate.
118 Saltash Community Flood Forum	Yes	GI Strategy	Paragraph 13.57 refers to the past and future tidal flooding of Saltash, flood attenuation, and SUDS: "Sustainable Urban Drainage Systems (SuDS) for developments must come forward ensuring they do not affect assets downstream; plus appropriate management regimes need to be put in place." It is of concern that earlier developments have not made suitable arrangements, financial and managerial, to manage public open spaces and flood attenuation schemes into the future. The Saltash Community Flood Forum considers that future bankrupt subsidiary maintenance companies (set up by the developer to limit liability) are not in anybody's best interest.	Under Paragraph 13.57 we would expect a statement similar to: the "appropriate management regimes" to be financially secure for the life of the development due to the non-implementation of Schedule 3 of the Water & Flood Management Act 2010.	The non-implementation of Schedule 3 of the Flood & Water Management Act 2010 has recently been reviewed by Government. Particular concerns have been raised over the sustainability of management companies and recommendations are still being considered for improving the situation. We cannot pre-empt the outcome of these deliberations though Cornwall Council has lobbied government to provide a more robust approach toward financial sustainability of the ongoing management and maintenance of these systems. However, we are currently constrained by existing guidance and procedures.  The Council does not consider any amendments to the DPD appropriate.

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118 Saltash Community Flood Forum	Yes	Housing	<p>New neighbourhoods are not consistent with objective 4 of future Cornwall theme 2 as described in the Sustainability Appraisal which states that the strategy should "support the 'dispersed spatial strategy' of providing homes and jobs, in a proportional manner, where they can best sustain the role and function of local communities in towns and villages", not adjacent to them. The footprint of 48,000 homes dispersed sensitively across the county will cover a tiny fraction of the land area and minimise the impact of sealed surfaces whereas allocating large areas for development will magnify the overall impact to a small number of locations.</p> <p>New neighbourhoods on undeveloped or farmland are not consistent with objective 9b of future Cornwall theme 4: maximising the use of previously developed land. The UK is committed to ensuring that 60% of all new housing and urban development is on previously developed land. It is not necessarily the case that the assumed future housing demand in the Saltash area needs to be provided so close to Saltash.</p>	<p>It is not clear from this document whether retrospective application of policy can be applied to the Broadmoor site as section 13.24 acknowledges that planning in principle has been granted for 1,000 homes on the site within the plan period, which we assume to be subject to reserved matters. This exceeds the residual number of 851 homes that are needed and we are grateful not to be asked to build any more than this. It would be helpful if the document could explain exactly how conflicts with the objectives outlined above can be overcome (it is not sufficient to say that previously developed land is not available) and how this policy will be used and adhered to in conjunction with any ongoing developments.</p> <p>Considering the impact of future climate change and changes to how people live and work, within the plan period, is it inappropriate to apportion dense levels of housing need, to create new neighbourhoods? If it is, the plan should state this so that future proposals can remain in line with the dispersed development strategy.</p> <p>Please also confirm that this part of the plan takes into account the latest extreme rainfall predictions from the Meteorological Office and the now 33% flood risk in any winter has been calculated so that existing properties, businesses, and infrastructure are protected.</p>	<p>The LP:SP, which has been subject to independent examination, sets the growth target for Saltash; with the DPD presenting the strategic site allocations to accommodate this. The Saltash Housing Evidence Report sets out that it is not possible to accommodate the required growth at Saltash within the existing urban area and so a new urban extension is required; with the most suitable location for this being at Broadmoor. It is not the role of the Site Allocations to justify the housing target for Saltash as this has been addressed through the LP:SP process.</p> <p>Whilst Table Slt2 sets out a residual housing target of 851 dwellings, to meet the LP:SP target of 1,200 dwellings, the LP:SP is neither a maximum or minimum target. In the case of Broadmoor, enabling a higher number of homes to be delivered provides economies of scale which will provide greater benefits to the new neighbourhood (e.g. being of sufficient scale to provide connections through the site from Carkeel through to Stoketon). Policy SLT-UE1 cannot be retrospectively applied to PA14/02447, however it is understood that application PA14/02447 is in line with Policy SLT-UE1.</p> <p>The creation of new neighbourhoods is not inappropriate planning and does not need further justification within the DPD.</p> <p>The Met Office's recent statement that there is a 33% chance of record rainfalls being exceeded within England and Wales in any one year is a recent prediction. Undoubtedly, new predictions related to the changing climate will continue to be made during the course of the Local Plan period. The current drainage guidance for Cornwall requires developers to assume a 40% uplift in rainfall intensities to account for unknown climate change over the lifetime of the development and to attenuate and manage these increased discharges offsite to present day peak levels.</p> <p>The Council does not consider any amendments to the DPD appropriate.</p>
192 Wainhomes (Emery Plan)	Yes	Housing	<p>Very significant development rates in excess of 100 dwellings per annum are anticipated by the Council on the Broadmoor Urban Extension. Whilst such delivery rates may be achievable if there are at least 4 developers and the market is consistently strong enough to support multiple sales outlets within a relatively small geographical location, the issue is that there is a significant risk of slippage in expected delivery.</p> <p>We also question the proposed lead-in times on this site in our assessment of the 5 year supply, which has a further knock-on effect on the supply.</p>		<p>The Broadmoor Farm application (PA14/02447) has now been approved.</p> <p>Cornwall has a 5 year housing supply and the Housing Trajectory sets out how demand is forecast to be met over the plan period. Latest figures (1st April 2017) forecast a delivery of a net total of 1,356 dwellings at Saltash (113% against target). It is acknowledge that, in the case of Saltash, that there is a lead in time on the trajectory, which will be monitored on an annual basis.</p>
192 Wainhomes (Emery Plan)	Yes	Housing	<p>Additional housing land needs to be identified in certain settlements to provide a reasonable prospect of meeting the requirement. The DPD plans for a supply of just 1,349 dwellings at Saltash against a minimum requirement of 1,200 (a flexibility factor of just 149 dwellings (12%)) - insufficient flexibility to respond to changing circumstances, i.e. slippage in the delivery of housing from strategic sites, as required by the Framework.</p> <p>We recommend at least 20% flexibility is provided in each settlement to give the plan a realistic prospect of meeting the minimum requirement. For Saltash this would mean identifying land to provide 1,440 dwellings. However, in Saltash the risk to delivery is increased as the vast majority of the supply (1,000 units, or 74%) derives from one site (Policy SLT-UE1, Broadmoor Urban Extension) during the plan period. That site has major infrastructure requirements, and its full delivery is reliant upon an ambitious lead-in time and an extremely high rate of delivery being achieved and maintained throughout the lifetime of the development. Therefore it could be that a higher degree of flexibility is needed, (40%). Alternatively the Council could apply more realistic delivery assumptions from the Broadmoor site. Either way, additional sites would be needed to provide flexibility in the supply.</p>		<p>Cornwall has a 5 year housing supply and the Housing Trajectory sets out how demand is forecast to be met over the plan period. Latest figures (1st April 2017) forecast a delivery of a net total of 1,356 dwellings at Saltash (113% against target). It is acknowledge that, in the case of Saltash, that there is a lead in time on the trajectory, which will be monitored on an annual basis.</p> <p>The Council does not consider it necessary to make any modifications to the DPD as a result of this representation.</p>
192 Wainhomes (Emery Plan)	Yes	Housing	<p>Wainhomes are promoting the land at Pill Lane, Saltash as an allocation for residential development. A site location plan is attached to response. The site comprises approximately 3.1ha (estimated capacity 70-80 dwellings). The site is under the control of Wainhomes and could come forward immediately for development. It is viable and deliverable during the plan period.</p> <p>The site is bordered by permanent built infrastructure on all sides, with the A38 to the south-west, Pill Lane to the north and Salt Mill to the east. The site also sits within the context of existing residential development to the west and north-east.</p> <p>The assessment of the site in the Housing Evidence Report is generally very favourable. The only reason why it appears to have been discounted is that when grouped with another parcel to form a larger allocation, there may be highway constraints. The concluding comments on the site appear to suggest that development may be acceptable in the future even though the site is not allocated: "Future development of this smaller scale site can be determined through the usual planning application process and (possibly) as part of the community led Saltash Neighbourhood Development Plan process."</p> <p>Therefore whilst the land at Pill Lane could come forward via the planning application process as suggested in the Housing Evidence Report, we consider that it should also be allocated for residential development.</p>		<p>The Housing Evidence Report for Saltash sets out that the area of land referred to under this representation was discounted from being a feasible strategic site allocation at Saltash.</p> <p>These option sites were included in the process at the request of the Town Framework Plan Steering Group and not as a result of officer recommendations. The sites are subject to constraints (particularly highway) and consequently, the level of growth which could be accommodated here is constrained; with any smaller scale proposals being suitable to be addressed through the usual planning application procedure and (possibly) as part of the Saltash NDP process.</p> <p>Cornwall has a 5 year housing supply and the Housing Trajectory sets out how demand is forecast to be met over the plan period. Latest figures (1st April 2017) forecast a delivery of a net total of 1,356 dwellings at Saltash (113% against target). It is acknowledge that, in the case of Saltash, that there is a lead in time on the trajectory, which will be monitored on an annual basis. The Broadmoor Farm application (PA14/02447) has recently been approved and the Council considers the housing trajectory to be reliable with no need to include a further site allocations, in addition to Broadmoor.</p> <p>The Council does not consider it necessary to make any modifications to the DPD as a result of this representation.</p>
211 North & Middle Pill Lane	Yes	The Strategy	<p>Figures should be presented for 2010 (Baseline at start of Plan) and 2017 (Current progress against plan.)</p> <p>There is also the need to include Key Facts relating to the five Specific Objectives for PP17/Cornwall Gateway Network Area being appropriate baseline data for Regeneration ; Jobs and services , Affordable Housing ; Transport and Tourism.</p> <p>Additional and more relevant figures need to be provided on Housing.</p> <p>Saltash according to Cornwall Council's own analysis of Council Tax bandings has an unusual housing balance profile when compared with the Cornwall average. There are low numbers of both small 1 bed homes at the entry level to the housing market as well as a shortfall of top end homes. Details of this should be included in the DPD as well as an intent and measures to bring about a more appropriate balance.</p>	<p>Figures should be presented for 2010 (Baseline at start of plan) and 2017 (current progress against plan.)</p> <p>1. Baseline figures are needed to measure and track the success of the Plan over time through to 2030</p> <p>Include 2010 and 2017 figures including for :-</p> <ul style="list-style-type: none"> <li>Regeneration – no. of shops/business; floor space; footfall etc.</li> <li>Job and Services – no. of f/t and p/t jobs; no. of self-employed businesses, no. of rural based businesses etc.</li> <li>Affordable Housing – no. of current units; current demand and annual % growth assumption.</li> <li>Transport – annual no of trains stopping; no of weekly bus services; miles of cycle paths; miles of footpaths; no of electric recharge points; no of weekly water taxis etc.</li> <li>Tourism – no. of bed-night stays; no. of visitors to attractions; no. of local attractions; no. of camp/caravan/chalet sites; no. of hotels and the like.</li> </ul> <p>2. Include figures on General Housing provision – no. of dwellings; no of open market housing; no of affordable housing; building rates and the like.</p> <p>3. Include details and diagrams to illustrate the present unusual balance of housing by Council Tax banding to promote the need and support for 1 Bed/studio accommodation and top end housing with text to encourage developments which encourage the provision of same to bring about a better balance.</p>	<p>The data presented was the most recent at the time of publication.</p> <p>Local authorities are required to report on the implementation of their local development schemes and local development policies through Authority Monitoring Reports, in Cornwall this is through the annual Cornwall Monitoring Report (a separate document to the DPD); whilst evidence supporting the DPD is available at www.cornwall.gov.uk.</p> <p>The Council does not consider it necessary to present additional data and evidence within the DPD .</p>

Representor Reference Number and Name	Attend Inquiry Yes/No	Comment Type	Comment	Modification Comment	Officer Response
211 North & Middle Pill Land	Yes	The Strategy	Paras 13.4 and 13.5 Strategic Objectives and Targets – There is the need to insert the five Strategic Targets stated in the Community Network Areas Document for Saltash being Regeneration, Jobs and Services, Affordable Housing, Transport, and Tourism	Include target figures necessary to meet plan obligations in 2030. Only housing and retail aspects are included at present. Also the Housing figure stated is the minimum target and needs to be referred to as such. It would also be beneficial to include the predicted housing trajectory figure needed to hit such housing figure in Saltash. This will enable progress against plan to be more transparent and monitored to allow corrective measures to be taken as necessary. Regeneration – no. of shops/business; floorspace; footfall etc. Job and Services – total no. of businesses; no. of f/t and p/t jobs; no. of self-employed businesses, no. of rural based businesses; no of business hubs; no. of live-work units; Area (in hectares) of available serviced land; Affordable Housing – no. of current units; no. of new units provided; annual revised demand figure; annual predicted % demand growth need; no. of self-build/self-custom units constructed. Transport – annual no. of trains stopping; no of weekly bus services; miles of cycle paths; miles of footpaths; no. of electric recharge points; no. of water taxis etc. Tourism – no. of bed-spaces; no. of bed-night stays; no. of visitors; no. of local visitor attractions; no. of camp/caravan/chalet sites; no. of hotels etc. 2. Also need to include figures on General housing provision – no. of dwellings (both open market and affordable); range/balance of housing by value and/or size/beds; current and predicted building rates etc.	The Planning Inspectors Report on the Examination into the LP:SP sets out at that it is not necessary to indicate that all the apportionments for each town and CNA residuals should be minimum figures. The basis for the apportionments is not an exact science and some flexibility in delivery is reasonable.  The DPD sets out targets as set by the LP:SP and which the policies of the DPD seek to address. The Council does not consider the inclusion of further targets to be necessary.  The Housing Trajectory for Saltash is reviewed annually as part of the Cornwall Monitoring Report (available at <a href="http://www.cornwall.gov.uk">www.cornwall.gov.uk</a> ).  The Council does not consider it necessary to present additional data and evidence within the DPD. Neither does it consider it necessary to repeat the Cornwall Gateway Community Network Area Objectives, which are presented in the LP:SP Community Network Area Sections.
211 North & Middle Pill Land	Yes	The Strategy	Para 13.7 Proximity to Plymouth needs greater enhancement in the document e.g. What are the predicted effects and impact on Saltash? Will they be negative or positive and what will be the consequences for the Saltash DPD? The Plymouth & South West Devon Joint Local Plan 2014 -2034 is not even mentioned. Plymouth is only 300m from Saltash, and has a massive socio-economic impact upon it. It is too big a topic to say it is a Neighbourhood Plan issue. The sphere of influence and gravitational pull of Plymouth has a profound effect on SE Cornwall. What should Saltash seek to derive. Indeed what should the Cornwall Gateway Community Network Area seek to derive? The River Tamar is an administrative boundary not an economic one! The DPD needs to reflect this fully and absolutely. There is a need to test and reassess the integrity of the whole Saltash DPD in terms of its Economic Growth plan and assumptions and more specifically the future vision for Saltash including job and housing numbers.	Include much more detailed analysis and policy assessment required for the Saltash DPD taking account of The Plymouth & South West Devon Joint Local Plan 2014-34 including but not solely limited to :- SPT 2 – Sustainable linked neighbourhoods and sustainable rural communities; SO3 – Delivering Growth in Plymouth City Centre and Waterfront Growth Area; SPT 7 – Working with neighbouring areas (specific mention of SE Cornwall and an intent to “maximise the benefits brought by the economic growth of Plymouth.”); PLY3 – Utilising Plymouth’s regional economic assets (stating specifically that The City will work ....”to strengthen its higher value industries, including it’s marine, advanced manufacturing, medical and health care and knowledge- based economic sectors, optimising the benefits that these assets bring to the city and regional economy including support for satellite facilities in the Thriving Towns and Villages Policy Area.” 2. Re-examine the Economic Growth assumptions on jobs and housing for Saltash and ensure that these are safe and robust. 3. Re-write the Saltash DPD to take account of 1 and 2 above and also the future Vision for the Parish to ensure alignment with the Saltash Neighbourhood Plan.	Saltash’s relationship with Plymouth is certainly an important factor to the future of the town and this is referred to through the Saltash section of the DPD.  Whilst there is a clear and beneficial relationship between Saltash and Plymouth there is, understandably, a local desire for Saltash to work towards being more self-sufficient where possible. Saltash is part of Cornwall and although there is undoubtedly a very strong relationship with Plymouth, the DPD has to work to meet the objectives of Cornwalls LP:SP as opposed to the Plymouth & South West Devon Joint Local Plan.  The purpose of the DPD is to address where the growth planned for at Saltash should be accommodated; this growth (employment space and housing numbers) has to be in line with the growth targets set by the LP:SP. The DPD cannot review these targets which have been tested through independent examination and are now adopted by Cornwall Council.  Saltash NDP has not yet been made. The Saltash NDP group and Saltash Town Council have commented on the Saltash section of the DPD through the preparation process and once adopted the DPD will form part of the Development Plan which NDP’s must be in general conformity with (so there will be a check that the Saltash NDP aligns with the DPD, as opposed to the NDP checking it conforms with the NDP).  The Council does not consider any amendments to the DPD appropriate.
211 North & Middle Pill Land	Yes	The Strategy	Para 13.11 - 13.15 More commentary required on the impact and potential of the Plymouth & South West Devon Joint Local Plan to 2034. A very narrow strategy is articulated in the Saltash DPD. Jobs are not merely about developing a new Business Park or providing major serviced sites, it is also about creating a climate and environment in terms of infrastructure, premises etc. for SME business and businesses to establish, develop and grow thus generating jobs. This point is missed within the Saltash DPD and potentially is a key aspect in terms of contributing to the future needs and development of the Plymouth and SW Devon economy as an attractive and alternative location. This is why so many people live in SE Cornwall but commute to work in Plymouth.	See comments relating to the Plymouth & South West Devon Joint Local Plan to 2034 under Para. 13.7. above. The true impact and potential of the regionally significant Plymouth(and SW Devon) economy needs assessment. 2. Include statements and data on the importance of the small business and self-employed sectors to the local and Cornish economy. 3. Reference Local Plan policies to encourage and support these sectors especially low cost easy-in easy-out start-up premises, business hubs, and live/work studio accommodation in both urban and rural areas. This will allow more people to work and live in Saltash resulting in improved sustainability. 4. Mention of developing the Renewable Energy sector in the town for generation sites and job creation. 5. Not everyone will require business accommodation on the Business Estates/Parks including the new Stoketon Cross Estate. Greater diversity and choice in provision is required and should be acknowledged. 6. The DPD needs to ensure a broad and balance supply of business start-up facilities, recognition of growing work-from home enterprises and the need to encourage suitable live-work units in the town and rural areas.	The purpose of the DPD is to address where the strategic growth planned for at Saltash should be accommodated; whilst the DPD presents a high level strategy for the town it is not its role to provide more detail than this. The relationship between the DPD (and the wider Local Plan) and the NDP, is that the DPD presents the higher level strategic policies, whilst local level details are presented within the Saltash NDP, with these local level NDP policies being in general conformity with the higher level policies (including the LP:SP and the DPD).  Saltash’s relationship with Plymouth is certainly an important factor to the future of the town and this is referred to through the Saltash section of the DPD.  Whilst there is a clear and beneficial relationship between Saltash and Plymouth there is, understandably, a local desire for Saltash to work towards being more self-sufficient where possible. Saltash is part of Cornwall and although there is undoubtedly a very strong relationship with Plymouth, the DPD has to work to meet the objectives of Cornwalls LP:SP as opposed to the Plymouth & South West Devon Joint Local Plan.  Quite correctly jobs don’t rely on simply developing new business parks; there are more factors to consider than this, however many are beyond the remit of what can be achieved through the site allocation policies presented in the DPD.  The DPD addresses strategic growth requirements (ensuring that there are sufficient sites to accommodate the forecast LP:SP growth targets). It does not repeat general policies (which are presented in the LP:SP) or propose more local level policies (which would be presented in the Saltash NDP).  The Council does not consider it necessary to make the proposed modifications.
211 North & Middle Pill Land	Yes	The Strategy	Paras 13.20-13.24  The Saltash DPD is considered to be flawed in relation to Housing Growth Policy and Planning for four fundamental reasons. Reason 1 is the lack of adequate consideration of the Economic Growth implications arising from the Plymouth and South West Devon Joint Local Plan 2014 to 2034 Reason 2 is the considerable risk in relying upon the Broadmoor Farm Urban Extension as a single strategic site to meet Saltash minimum housing target obligations through to 2030; Reason 3 is that no robust planning methodology has been applied to predict the target and hence planning level for the provision of Affordable Housing to meet local need through to 2030 resulting in an absence of strategy within the DPD to ensure the delivery of forecast numbers. Reason 4 is that the combined total effect of the three deficiencies call into question the integrity of the Sustainability conclusions for the Saltash DPD.  Together, these four Reasons with their associated arguments make a compelling case for a fundamental re-assessment of the overall Economic Growth, Housing Assessment and Sustainability assumptions for Saltash and justify the imperative to make further Site Allocations under the Saltash DPD.	To ensure the overall integrity and robustness of the Saltash DPD :- 1. Reassess the impact of the Plymouth and South West Devon Joint Local Plan 2014 to 2034 to test the validity of planned employment and housing number assumptions/targets for Saltash through to 2030. 2. Reassess the risks of relying upon a single strategic site to deliver all of the economic growth and housing requirements through to 2030 for both Saltash and the Cornwall Gateway Community Network Area. 3. Determine an overall planning level for the provision of Affordable Housing units within Bands A to Band E inclusive for Saltash through to 2030 and re-calculate the housing provision required to deliver same. The recalculation should assuming the 30% affordable housing quantum for the area and, for the sake of prudence, allow an additional 10% contingency for slippage arising from “scheme viability” reductions under subsequent development Sec 106 Agreements. 4. Check the overall Sustainability integrity for Saltash; and 5. Make appropriate and additional Strategic Site Allocations for Saltash under the DPD or alternatively require such matter to be addressed under the Saltash Neighbourhood Plan through the identification of additional non-strategic sites (up to 50 units).	In response to the 4 main points:  Point 1 and Point 3 – the intention here is to get the target growth rates revised for Saltash. The DPD works to address the growth rates set within the LP:SP. The LP:SP has now been adopted, having been subject to independent examination, and cannot be further reviewed as part of the DPD process.  Point 2 – Cornwall has a 5 year housing supply and the Housing Trajectory sets out how demand is forecast to be met over the plan period. It is acknowledged that, in the case of Saltash, there is a lead in time on the trajectory, which will be monitored on an annual basis. Latest figures (1st April 2017) forecast a delivery of a net total of 1,356 dwellings at Saltash (113% against target).  Point 4 - the DPD has been subject to and has satisfied a Sustainability Appraisal; this can be accessed at <a href="http://www.cornwall.gov.uk">www.cornwall.gov.uk</a> .  Point 5 - the Council is satisfied that the site allocations proposed at Saltash are sufficient to address the LP:SP growth forecast for the town to 2030. It is satisfied that there is no need to review growth targets or to identify additional development sites. The council has no grounds to require Saltash Town Council to identify additional non-strategic sites (e.g. up to 50 units) for future development as part of Saltash NDP. The NDP is a community lead plan and as such the inclusion of any additional allocations will be for the town to decide for themselves.  The Council does not consider it necessary to make any modifications to the DPD as a result of this representation.

Representor Reference Number and Name	Attend Inquiry Yes/No	Comment Type	Comment	Modification Comment	Officer Response
211 North & Middle Pill Land	Yes	The Strategy	Significantly, additional Potential Development Options for Saltash were identified by Cornwall Council in their Core Strategy Consultation Document published in January 2012. This included under the Saltash Town Framework Potential Development Options A4 and A5 in North and Middle Pill. Indicative development figures provided by the Council indicated for site A4, 108 to 144 houses, and for site A5, 90 to 120 houses. The sites are especially well and closely located to the existing town centre, waterfront, public transport links as well as being located adjacent to two exceptional sport and recreational facilities and a planned cycle-network hub for the Town. The sites are also outside the very wide-spread AONB designation which covers the majority of the Parish. The special proximity of these sites offers, without question, the greatest opportunity of any potential development site in Saltash to contribute to Strategic Objectives for the Regeneration of the Town Centre and Waterfront. Public consultation and a series of detailed Pre-Application submissions have already been made to Cornwall Council for Tamar Village Saltash – a concept plan for a mixed development of between 150 and 200 dwellings. Full details are available at <a href="http://www.tamarvillagesaltash.co.uk">www.tamarvillagesaltash.co.uk</a> Highway and Traffic assessments have been completed and discussions held with Cornwall Council. Six highway improvement schemes options at the New Road, Glanvill Terrace and Old Ferry Road Junction have been prepared to improve traffic flow and the segregation of vehicles, cycles and pedestrians. Land and Environmental Surveys have also been undertaken. The Saltash Neighbourhood Plan Steering Group were briefed on the proposal and the present position in July 2017. This included notifying them of separate our offers being on the table from different developers for different parts of the land owned by the Consortium ranging in size from 6.1ha (15 acres) to the entire 28.5 hectares (70 acres.) An invitation to prepare the best and most appropriate scheme for Saltash has been offered but at the time of writing no response has been received. The total area or parts of the North and Middle Pill area can be brought "on-line" with a modest lead-in time. Because of the nature of the site, mixed development schemes spanning some 50 to 250 homes can be provided. Further Site Allocations of this nature will reduce the development risks for Saltash and bring about greater market choice		The Housing Evidence Report for Saltash sets out that the area of land referred to under this representation was discounted from being a feasible strategic site allocation at Saltash. These option sites were included in the process at the request of the Town Framework Plan Steering Group and not as a result of officer recommendations. The sites are subject to constraints (particularly highway) and consequently, the level of growth which could be accommodated here is constrained; with any smaller scale proposals being suitable to be addressed through the usual planning application procedure and (possibly) as part of the Saltash NDP process. The Council does not consider it appropriate to allocate land in this location. The Broadmoor Farm application (PA14/02447) has recently been approved. Cornwall has a 5 year housing supply and the Housing Trajectory sets out how demand is forecast to be met over the plan period. It is acknowledge that, in the case of Saltash, that there is a lead in time on the trajectory, which will be monitored on an annual basis. Latest figures (1st April 2017) forecast a delivery of a net total of 1,356 dwellings at Saltash (113% against target). The Council does not consider it necessary to allocate additional sites in the DPD at Saltash.
211 North & Middle Pill Land	Yes	Transport Strategy	13.37 The Saltash Green Infrastructure Strategy Map denotes the China Fleet Country Club as an Activity Focus Point. The Club is located in the NE corner of Figure Sit3. The Club is the largest employer and generates considerable amounts of staff, customer and supplier traffic. There is also considerable pedestrian and cycle use yet there is an absence of an important section of footpath/ cycle path link from the bottom of Salt Mill to the staggered junction with Pill Lane some 200m distant up the hill to the north. Land on the eastern side of the road provides capacity for a footpath and is Highway Maintainable at Public Expense. This area should be defined/delineated on the Saltash Town Framework : Transport Strategy 2030 Map and Saltash Green Infrastructure Strategy Map as an "Existing/potential future walking/cycling route."	Both the Saltash Town Framework : Transport Strategy 2030 Map and Saltash Green Infrastructure Strategy Map should be amended to delineate the route from Salt Mill through to the China Fleet Country Club "Activity Focus Point" as an "Existing/potential future walking/cycling route."	A town wide walking and cycling network is being drawn up to identify gaps in provision and to seek to improve infrastructure as necessary. This will involve review of key destinations/attractors' and stakeholder engagement to ensure improvements are targeted at key desire lines, catering to demand. The Council does not consider it necessary to add additional 'potential walking and cycling routes' onto the Transport Strategy Map as these routes are indicative only (an amendment to the key of the Saltash Transport Strategy Map could be considered to greater clarify this).
211 North & Middle Pill Land	Yes	Other	Duty to Cooperate comment - Negligible Evidence of any Effects, Impact or Sustainability Assessment of the Plymouth and South West Devon Joint Local Plan 2014-2034 on Saltash or the Cornwall Gateway Community Network Area.		The DPD is part of the wider Development Plan for Cornwall and follows adoption of the LP:SP (which sets the strategic policies for Cornwall). Both the DPD and the LP:SP have been subject to a Sustainability Appraisal; as have development documents produced by neighbouring authorities. Documents prepared by neighbouring authorities have been reviewed at a high level to identify the areas where cumulative effects between plans may arise. This work was carried out as part of the SA on the LP:SP (see Section 8.21 of the Planning Future Cornwall: Cornwall Local Plan Strategic Policies 2010 – 2030 Sustainability Appraisal, available at <a href="http://www.cornwall.gov.uk">www.cornwall.gov.uk</a> ). The Council does not consider it necessary to make any modifications to the DPD as a result of this representation.
216a Persimmon Homes Cornwall	Yes	Housing	Errata – Facts and Figures on Pg. 274 differ from the LP:SP		No relevant facts and figures are presented on pg.274; unsure which facts and figures the respondent refers to. The Council does not consider it necessary to make any modifications to the DPD as a result of this representation.
216a Persimmon Homes Cornwall	Yes	Housing	Housing Reference to Para 47 of NPPF and that Local Planning Authorities must use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area and is consistent with the policies set out in the framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period. Reference to LP:SP Paras 2.38 – 2.57 re affordable housing. Table 4 (Pg 44 of LP:SP) sets out that expected delivery will only achieve 58% of the total affordable housing need. Housing requirement is a minimum and so scope to provide additional housing at Latchbrook. Object to soundness of the plan on the basis that the plan does not meet the test of achieving its objectively assessed need and is not using the flexibility written in to the plan at the strategic level to adjust the lack of provision by the ability as directed by the Local Plan Inspector to provide the addition of sites at the DPD stage. The DPD dos not meet the requirement of Para 14 of the NPF (bullet point 2) 'Local Plans should met the objectively assessed needs with sufficient flexibility to adapt to rapid change'.		The DPD works to address the growth rates set within the LP:SP. The LP:SP has now been adopted, having been subject to independent examination. Cornwall has a 5 year housing supply and the Housing Trajectory sets out how demand is forecast to be met over the plan period. Latest figures (1st April 2017) forecast a delivery of a net total of 1,356 dwellings at Saltash (113% against target). It is acknowledge that, in the case of Saltash, that there is a lead in time on the trajectory, which will be monitored on an annual basis. The Council is satisfied that the site allocations proposed at Saltash are sufficient to address the LP:SP growth forecast for the town to 2030 and that there is no need to review growth targets or to identify additional development sites. The Council does not consider it necessary to make any modifications to the DPD as a result of this representation.
216a Persimmon Homes Cornwall	Yes	Housing	Test of Soundness Para 182 of the NPPF sets out the tests of soundness: a) Positively prepared CC Housing delivery interim note (May 2017) Appendix 4, identifies an additional site for 10 dwellings at Torpoint and no other significant permissions (at time of writing) in the past 12 months in Saltash CNA. At Saltash, two main permissions are Churchtown Vale (36 dwellings) and Churchtown Farm (25 plots). Broadmoor Farm application is still not permitted. Higher delivery rate (100 units per annum) demonstrated by promoters of Broadmoor Farm at LP:SP Public Inquiry (higher than 205 rate of 75-80 units per annum). The site is managed by a promoter and unlikely to deliver homes before the expiry of 4 years. CCs Housing trajectory (Sep 2016) shows significant numbers of homes at Broadmoor won't be delivered until 2019, therefore its unable to demonstrate its meeting its own objectively assessed requirements at a point 5-6 years in to the plan period and it has not been positively prepared since the sites identified comprise one scheme. b) Justified Evidence at LP:SP examination and within the Saltash Housing Evidence Report show that Latchbrook site, in terms of the overall assessment of urban design was equal to the site at Broadmoor Farm. Respondent therefore objects on basis that Latchbrook Farm should be considered as a reasonable alternative to meet housing needs. Strategy should be revisited. c) Effective Plan is not delivering the required trajectory. Saltash has delivered circa 130 dwellings since 2010 (avg. 19 units per annum). Council identifies lack of investment from larger house builders. Broadmoor is forecast to deliver 100 units pa (equivalent of 3 competing outlets) – unrealistic to assume 3 national house builders will compete and deliver number of houses CC have proposed. Persimmon keen to deliver a policy compliant scheme at Latchbrook. One allocation at Saltash is a risk to 5yr supply; as a minimum CC should consider allocating a reserve site in case Broadmoor isn't delivered. Also fail to see how 250 dwellings in Torpoint will be delivered when town has historically only delivered 7 dwellings since 2010. Latchbrook is suitable, deliverable and achievable alternative.		In response to a) The Broadmoor Farm application (PA14/02447 ) has now been approved. Cornwall has a 5 year housing supply and the Housing Trajectory sets out how demand is forecast to be met over the plan period. Latest figures (1st April 2017) forecast a delivery of a net total of 1,356 dwellings at Saltash (113% against target). It is acknowledge that, in the case of Saltash, that there is a lead in time on the trajectory, which will be monitored on an annual basis. In response to b) Saltash Housing Evidence Report sets out the reasons why Broadmoor is the favoured site to be allocated. The strategy does not provide an alternative site as the focusing of growth in one location maximises the potential for a more sustainable and comprehensive new neighbourhood area to be developed. The Council do not consider it necessary to revisit the strategy for Saltash. In response to c) as set out above, Cornwall has a 5 year housing supply and the Housing Trajectory sets out how demand is forecast to be met over the plan period. It is acknowledge that, in the case of Saltash, that there is a lead in time on the trajectory, which will be monitored on an annual basis. The Council does not consider it necessary to allocate a reserved site at Saltash. The LP:SP target for Torpoint is being addressed through Torpoint NDP, where an early draft of this identifies a site allocation to the north of the town which will deliver the majority of this target. Latchbrook is not considered a suitable alternative to growth in Torpoint; Saltash, is approximately a 17 mile road trip from Torpoint and Torpoint needs its own growth in order to sustain itself. The Council does not consider it necessary to make any modifications to the DPD as a result of this representation.



Representor Reference Number and Name	Attend Inquiry Yes/No	Comment Type	Comment	Modification Comment	Officer Response
216a Persimmon Homes Cornwall	Yes	Housing	<p>Failure to meet current short term need CCs Housing Trajectory for Saltash CNA shows housing delivery is below LP:SP requirement (downward trajectory to 6-7 homes built each year). Downward trajectory hasn't been addressed over forecast 5yrs of the plan (fails to address this requirement to be effective under Para 182 of the NPPF).</p> <p>Whilst CC might point to recent 5 Year land supply assessment, it does not address specific issues of shortfall in any CNA. Housing has increased elsewhere in Cornwall but not Saltash.</p> <p>Inspector at LP:SP inquiry provided guidance on this point: "Para 1.41 of the Plan indicates that the 5 year supply will be calculated on a whole-Cornwall basis. That approach is not seriously disputed and is logical given the housing requirement is calculated for the whole county. Where there is a 5 year supply in Cornwall as a whole (and so policies for housing are fully engaged) it is appropriate for the Plan to seek any shortfall within an individual CNA to be made up within that CNA – (MM24).</p> <p>The situation of under delivery in Saltash must be addressed at this stage of the plan making process and the plan is unsound in not addressing it.</p>		<p>In response to a) The Broadmoor Farm application (PA14/02447 ) has now been approved</p> <p>Cornwall has a 5 year housing supply and the Housing Trajectory sets out how demand is forecast to be met over the plan period. Latest figures (1st April 2017) forecast a delivery of a net total of 1,356 dwellings at Saltash (113% against target). It is acknowledge that, in the case of Saltash, that there is a lead in time on the trajectory, which will be monitored on an annual basis. The Broadmoor Farm application (PA14/02447 ) has recently been approved and the Council considers the housing trajectory to be reliable with no need to address under delivery at this stage in the plan making process.</p>
216a Persimmon Homes Cornwall	Yes	Housing	<p>Delivery of longer term demand Reference to Para 47 of NPPF – emphasis that key sites should be identified (critical to delivery of policy). Lead in time for Broadmoor to deliver homes is 4 years (and where anticipated planning permission would have already been granted). At date of consultation permission not granted.</p> <p>Proposed amendments to PA14/02447 where applicants seeking to amend highway intervention milestones – Saltash TC expressed grave concerns that proposed changes would extend the period of disruption on the A38 and hinder development of the industrial units at Broadmoor Farm. Given this concern, if needs are to be met more sites are required.</p> <p>Inconsistency in approach in the DPD – Bodmin allocated a greater number of sites in order to ensure supply (see DPD pg 232, Table Bd2 Paras 11.33-11.35); inconsistent approach and also no consistent approach as set out in Para 1 of Policy 2a.</p> <p>Do not believe plan is sound as it doesn't conform to the test under the requirements of NPPF Para 47.</p> <p>Fragile approach relies on one site delivering growth. Delayed planning permission, a long lead on time for infrastructure and that land has to be sold to house builder risks plan becoming out of date and rift between supply and demand.</p> <p>Reference to Examination of Stratford on Avon Core Strategy Inspectors interim Conclusions Pg 20, Para 67. He noted that "A reserve site policy would better reflect Para 14 of the Framework, which says a plan should meet OAN with sufficient flexibility to adapt to rapid change." We invite the Inspector to consider the Latchbrook Farm site in this context.</p>		<p>The Broadmoor Farm application (PA14/02447) has recently been approved and the Council considers the housing trajectory to be reliable with no need to identify additional sites. Latest figures (1st April 2017) forecast a delivery of a net total of 1,356 dwellings at Saltash (113% against target).</p> <p>Lead in times and delivery rates for the proposed Bodmin allocations show that none of these larger sites will be completed within the plan period; as a result, all of the sites are needed to support delivery of the target. This differs from Saltash where the trajectory indicates delivery at Broadmoor within the plan period.</p> <p>The Council does not consider it necessary to allocate a reserve site at Saltash.</p>
216a Persimmon Homes Cornwall	Yes	Housing	<p>The assessment of alternative sites - The Council have shown the site at Latchbrook Farm as a logical location for growth and has previously been a recommendation from officers of Cornwall Council</p> <p>SHLAA – no record of SHLAA site being submitted for Latchbrook Farm, at Pg. 6 Figure 1 it is omitted from the evidence base (confirmation attached that CC had had mislaid original representation).</p> <p>Access &amp; Connectivity to Saltash – Latchbrook site is accessible to many local facilities and there is access to serve the site with possibility of vehicle connection to the town. Latchbrook shows advantages when compared to Broadmoor. Saltash NDP group, as part of their assessment, has considered accessibility of the town centre from the surrounding parts of the town. There is a clear distinction between the accessibility of the Latchbrook Farm site as having advantages over the Broadmoor Farm proposals which is separate from Saltash and unlikely to provide a degree of connectivity for new residents to the town.</p> <p>Environmental Assessment – Fig. 5 of Saltash Housing Evidence Report shows the environmental assessment and identifies the Latchbrook site as an area of local open space significance- proposals for the site have been considered with a view to the site contribution towards providing open space and access to the countryside. This has been the subject of discussion with officers of the Council and with pre application consultation with the design review panel.</p> <p>The results of the landscape assessment are shown at Figure 7 and a summary assessment is shown at Figure 8, which assesses the best scoring original cell in urban design terms. Latchbrook is Cell 10 (Figure 8) which in terms of landscape and overall urban design assessment performed better than Broadmoor and any other site in terms of overall performance against the criteria. The cell is located close to existing employment and primary routes, plus capable of supporting a new neighbourhood area that could include new services and facilities. Urban design assessment compares Latchbrook against Broadmoor and states that Cell 1 (Broadmoor) is similar to Cell 10 (Latchbrook) in many respects apart from it contains several environmental constraints and is segregated from the town by the A38 that runs along the cell's southern boundary.</p> <p>Transport - The Saltash transport strategy to 2030 identifies key strategic upgrades; one of which on the A38 will attempt to alleviate the east to west flows in and out of Cornwall. Others address the intent to create more walkable and public transport orientated approaches to changing peoples transport patterns. The site at Latchbrook is within 1000m of places of worship, local shop and open space (map attached to representation) and provide the opportunity for housing to be more closely related to existing employment sites, reducing the need for car based transport. Furthermore the prime driver for the allocation of the proposed Broadmoor site is that it will provide a balance of homes and jobs to ensure that Saltash provides its own employment base to become less reliant on the draw of the conurbation at Plymouth.</p> <p>The upgrades proposed at Broadmoor do not deliver improved connectivity between the town's high street and the development site. One of the main intentions of Saltash NDP is make the town centre an attractive destination; the intended development at Broadmoor Farm will create a community that is self contained and orientated along a trajectory of the A 38 corridor its point of attraction being Plymouth with few positive links to the town centre of Saltash. Development at Latchbrook has been shown by the councils own assessment to be well related to employment uses and the improved public transport routes would provide a connectivity to the existing town based on an existing east west corridor directly serving the town centre.</p> <p>Sustainability - The heat map assessment which measures sustainability also shows Latchbrook as a better choice than Broadmoor. The site is more accessible to Saltash, closer to existing employment opportunities and is capable of being developed independently, it sits alongside the A38.</p> <p>At pre application discussion in 2015 and the site was assessed in terms of its environmental impact considering the cumulative impact of both the Broadmoor Farm site and the Latchbrook Farm site. This was especially so in terms of impact on the drainage system and the highway network. The site had been assessed for its cumulative assessment its delivery early in the plan period to achieve housing growth had been demonstrated to be able to be achieved without significant delays in the delivery of key infrastructure. Again this reinforces the deliverability of the site to deal with current inadequate and fragile land supply.</p> <p>Potential Economic and Affordable Housing outputs - The site has the potential to provide affordable housing; can contribute to meeting the current back log of affordable housing; together with the potential for Starter Homes Development of the site. The employment benefits would provide 134 direct jobs in connection with the construction of the site, and 202 indirect jobs.</p> <p>Contribution this site could make to Green Infrastructure - It has always been an intention in the design of Latchbrook</p>		<p>The Saltash Housing Evidence Report sets out the reasons why, when compared to Latchbrook site, Broadmoor is the favoured option to be allocated. Focusing growth in this one location maximises the potential for a more sustainable and comprehensive new neighbourhood area to be developed. It is acknowledged that within some elements of the urban extension assessment Latchbrook outperforms Broadmoor, however overall the site prioritisation results in Broadmoor being the preferred site option. In terms of access, the scale of Broadmoor site is likely to encourage public transport services to operate through it and the Transport Strategy and policy measures work to ensure sustainable movement connections, including a pedestrian bridge over the A38 between Broadmoor and the town, thus providing connectivity for new residents to the town.</p> <p>Whilst within some elements of the urban extension assessment Latchbrook outperforms Broadmoor, Latchbrook is not without access constraints itself (i.e. the valley constraint to the west).</p> <p>The SHLAA has been checked and the site at Latchbrook is included. It was an error that this was not picked up at the stage Figure 1 was produced. However, this does not impact the outcome of the stage of the work; as the SHLAA site is peripheral to the existing urban area it would have been annotated in Figure 1 to say it would be considered as part of the Urban Extension Assessment (which it was); and, at the site prioritisation stage (Table 11 of the Housing Evidence Report) the pre-application discussions on this site are referred to.</p> <p>It should be noted that the heat map assessment is not the only measure of sustainability. The Sustainability Appraisal (SA) Report sets out that a range of scoring criteria (approximately 45) are considered within the Site SA's; heat mapping contributes to only 1 of these.</p> <p>The respondent refers to employment benefits of progressing development at Latchbrook. It is noted that these only relate to jobs in connection with construction; there being no advantage in this respect over the Broadmoor development.</p> <p>Latchbrook site is not an unsustainable location and was one of the options in the final stages of the urban extension assessment. However, when factors such as alignment with the wider town strategy were taken into consideration, Broadmoor outperformed Latchbrook. The Council does not consider any factors have emerged to alter this approach.</p> <p>The Council does not consider it necessary to make any modifications to the DPD as a result of this representation.</p>

Representor Reference Number and Name	Attend Inquiry Yes/No	Comment Type	Comment	Modification Comment	Officer Response
216a Persimmon Homes Cornwall	Yes	Housing	The Councils own process of assessment shows that Latchbrook Farm is a suitable option for growth and in line with sub paragraph 11 of NPPF paragraph 47 can be demonstrated as being available now, in a suitable location and can be achievable within the next five years to provide a positive response to the lack of delivery of land supply in Saltash. It therefore satisfies the tests of the NPPF paragraph 47 and its allocation would show a consistency of approach to other areas of the SADPD where choice of housing options has been identified to deliver growth.  Further evidence appended to the representation:  Appendix 9, shows the results of the Local Plans Expert Group report to Government on the problems associated with the implementation and delivery of housing. This reinforces the approach we have advocated that the SAPO at Saltash should allocate a further site at Latchbrook Farm to deal with the shortcomings in the housing trajectory, the need to provide flexibility in delivery and to satisfy the test of soundness as stated in the NPPF.  Appendix 12 is a site delivery document showing how the site at Latchbrook can be delivered to assist in providing the homes.		Latchbrook site is not an unsustainable location and was one of the options in the final stages of the urban extension assessment. However, when factors, such as alignment with the wider town strategy were taken into consideration Broadmoor outperformed Latchbrook. The Council does not consider any factors have emerged to alter this approach.  The Council does not consider it necessary to make any modifications to the DPD as a result of this representation.
216a Persimmon Homes Cornwall	Yes	Housing	UE1 - For the above reasons we object to the inclusion of Policy SLT UE1 without the added allocation of a site which can contribute to the existing unmet need for a five years supply in the Saltash town area.		Cornwall has a 5 year housing supply and the Housing Trajectory sets out how demand is forecast to be met over the plan period. Latest figures (1st April 2017) forecast a delivery of a net total of 1,356 dwellings at Saltash (113% against target). It is acknowledged that, in the case of Saltash, that there is a lead in time on the trajectory, which will be monitored on an annual basis. The Broadmoor Farm application (PA14/02447) has recently been approved and the Council considers the housing trajectory to be reliable with no need to include a further site allocation, in addition to Broadmoor, at Latchbrook.
216a Persimmon Homes Cornwall	Yes	Housing	13.22 - This states that in identifying the most appropriate location to accommodate housing development, an assessment was carried out which examined all potential land adjoining the built edge of the town. The details of this are contained within the Site Allocations DPD: Saltash Housing Evidence Report. The Companies SHLAA submissions are not noted therefore the availability of an alternative site does not seem to have been raised in the minds of the Council Officers		The SHLAA has been checked and the site at Latchbrook is included. It was an error that this was not picked up at the stage Figure 1 was produced. However, this does not impact the outcome of the stage of the work; as the SHLAA site is peripheral to the existing urban area it would have been annotated in Figure 1 to say it would be considered as part of the Urban Extension Assessment (which it was); and, at the site prioritisation stage (Table 11 of the Housing Evidence Report) the pre-application discussions on this site are referred to. It is clear within the Housing Evidence Report that the availability of Latchbrook has been understood by the Council.
216a Persimmon Homes Cornwall	Yes	Housing	13.23 Whilst the intention for the Broadmoor site are laudable the Town Council has itself recently objected to the changes now being produced to the submitted planning application which seek to vary conditions relating to the consent (Appendix 8) which now throws in to question the delivery of the employment units which was a key reason for the application being accepted by the Town Council.  Broadmoor isn't the most suitable location for growth. By the Councils own assessment the most suitable site is Latchbrook. The suitability of Broadmoor is only by way of a local one and lack of public objection to Broadmoor. There is every need to provide an additional opportunity for growth to ensure that the target - which is a minimum is met.		The respondent's submission sets out that Saltash Town Council (in response to CC consultation on conditions relating to highway milestones) 'expresses grave concerns that the proposed changes would extend the period of traffic disruption on the A38 and hinder development of Broadmoor Farm, especially the industrial units'. This does not bring into question the delivery of the employment units (which are also set out under proposed Policy SLT-E1 of the DPD).  As set out previously, Latchbrook site is not an unsustainable location and was one of the options in the final stages of the urban extension assessment. However, when factors, such as alignment with the wider town strategy were taken into consideration Broadmoor outperformed Latchbrook. The Council does not consider any factors have emerged to alter this approach.  The Council does not consider it necessary to make any modifications to the DPD as a result of this representation.
216a Persimmon Homes Cornwall	Yes	Housing	13.24 - We emphasise that this paragraph does not acknowledge the obvious current shortfall in delivery of housing and the need in our view for an alternative site to be identified which deals with an acknowledged lack of housing supply at this stage.  Planning application (PA14/02447) has still not been given consent; the delivery of the site is therefore questioned.		Cornwall has a 5 year housing supply and the Housing Trajectory sets out how demand is forecast to be met over the plan period. Latest figures (1st April 2017) forecast a delivery of a net total of 1,356 dwellings at Saltash (113% against target). It is acknowledged that, in the case of Saltash, that there is a lead in time on the trajectory, which will be monitored on an annual basis. The Broadmoor Farm application (PA14/02447) has recently been approved and the Council considers the housing trajectory to be reliable with no need to include a further site allocations, in addition to Broadmoor.
216a Persimmon Homes Cornwall	Yes	Transport Strategy	13.38 Where it is stated that the development at Broadmoor Farm will unlock development in the town, improve journey times and inter regional connectivity. The proposed improvements will not deal with the north to south congestion from Carkeel Roundabout in to the town nor the lack of road capacity to the west of the Stoketon Cross junction which causes long tail back on the main road.  The Broadmoor Farm site will not provide targeted sustainable methods of connectivity for the reasons stated above.		Transport modelling has been undertaken which demonstrates that growth can be accommodated, subject to the implementation of the related transportation strategy.  In terms of access, the scale of Broadmoor site is likely to encourage public transport services to operate through it and the strategy policy measures work to ensure sustainable movement connections, including a pedestrian bridge over the A38 between Broadmoor and the town, thus providing connectivity for new residents to the town. Further investment in pedestrian and cycling links between the development site at Broadmoor and the town are planned by CC.  The Council does not consider it necessary to make any modifications to the DPD as a result of this representation.
216a Persimmon Homes Cornwall	Yes	Housing	216 Persimmon Representation is supported by a number of appendices with summary of representation outlined above. For information, the appendices are: Appendix 1 Housing Trajectory Appendix 2 E Mail SHLAA record Appendix 3 SHLAA Map Appendix 4 Facilities Plan Appendix 5 Landscape Assessment Appendix 6 Overview Urban Design Appendix 7 Heat Map Appendix 8 NHP minute- objection to changes to Broad moor farm application Appendix 9 Extract from The Local Plans Expert Group Report March 2016 Appendix 10 Extract from the Cornwall Local Plan Inspectors report Sept 2016 Appendix 11 Extract from the Stratford in Avon Inspectors Interim Conclusions Appendix 12 Site Delivery Statement		Noted. No separate officer response required as these appendices are supporting the representation (the main points of this have been addressed above).
219c CEG (Lichfields)	Yes	The Strategy	Paras. 13.20 – 13.24 CEG requests that para. 13.21 is amended to fully reflect the adopted Local Plan: Strategic Policies document (November 2016). Policy 2a of the Strategic Policies document refers to the delivery of "a minimum of 52,500 homes..." Para. 1.73 sets out that the Council will ensure there is at least a 5 year supply of deliverable sites in Cornwall. Para. 1.75 also identifies that the housing trajectory will be kept under review. Therefore, the text in the Site Allocations draft document should include the same wording to confirm that the housing target is a minimum number. • Discussions with the Council regarding planning application ref. PA14/02447 have been ongoing since publication of the consultation document. Para. 13.24 can be updated to reflect the current position as set out below; in particular, the highway issues have been resolved and Highways England has issued its formal response to confirm its agreement to the proposals. CEG requests that this section of the document is kept under review, since the permission should be issued shortly and the document should be updated to confirm that planning permission has been granted prior to submission for Examination, if this is the case.	In line with the comments set out above, CEG requests that the following changes are made to the additional policy requirements (new text is in bold and text to be deleted has been struck through):  • CEG requests that para. 13.21 is amended as follows to reflect the adopted Strategic Policies Development Plan Document, "The LP:SP has targeted the delivery of a <b>minimum of 1200 dwellings</b> at Saltash. Table Sit2 sets out delivery against this target, which shows there is a need for land to be allocated to accommodate at least 851 dwellings. <b>The housing apportionment for Saltash will be kept under review over the Plan period to ensure that a five year supply of deliverable sites can be demonstrated in Cornwall.</b> " • CEG requests that para. 13.24 is amended to reflect the up to date position in relation to application ref. PA14/02447, "At the time of writing Broadmoor site was subject to a planning application (PA14/02447) and it had been resolved to grant permission subject to <b>completion of the S106 Agreement. outstanding highway issues being addressed.</b> The planning application is for a mixed use scheme that includes 1,000 dwellings. It is forecast that the site will be fully developed within the Plan period."	The Planning Inspectors Report on the Examination into the LP:SP sets out at that it is not necessary to indicate that all the apportionments for each town and CNA residuals should be minimum figures. The basis for the apportionments is not an exact science and some flexibility in delivery is reasonable.  The Council has no objection to including the additional wording " <u>The housing apportionment for Saltash will be kept under review over the Plan period to ensure that a five year supply of deliverable sites can be demonstrated in Cornwall</u> " at Para 13.21.  The Broadmoor Farm application (PA14/02447) has recently been approved and the Council considers it appropriate to reflect this within Para 13.24 to read " <u>Planning approval has been granted at Broadmoor site for a mixed use scheme that includes 1,000 dwellings. It is forecast that the site will be fully developed within the Plan period.</u> "

Representor Reference Number and Name	Attend Inquiry Yes/No	Comment Type	Comment	Modification Comment	Officer Response
239 Mr D J Venables (CWP C	No	Transport Strategy	<p>13.41 Table Sit3 &amp; Para 13.42 developers are required to develop both the roundabout plans and the employment travel plans - there is no apparent requirement for them to consult local businesses or to coordinate their activity with the Council's road improvements at Roodscroft Corner.</p> <p>If the Council's activates an early dedication of the A388 to pedestrians and cyclists, southbound, between Roodscroft and Carkeel without the Stoketon Cross roundabout in operation the result will be 15-20 tonne lorries, from the construction sites and the landfill traffic, waiting for significant periods to cross the heavy traffic flow on the A 38 while at the Roodscroft corner similar lorries will be attempting a standing start, low gear, ascent of some 20m in 200m of road to the Roodscroft site entrance. This will increase the unproductive burning of diesel fuel inconsistent with NPPF 4.30 (reducing greenhouse gases).</p> <p>Additionally during the rush hour the A388 handles between 600 and 800 vehicles an hour southbound it is not altogether clear that inserting a roundabout into the traffic flow at Roodscroft Corner will reduce congestion.</p> <p>The addition of a roundabout at Roodscroft Corner, in my view, militates against the requirements of NPPF 4.30 and should be removed from the plan as should any suggestion that the A388 between Roodscroft and Carkeel should be made pedestrian and cyclist priority route unless plans to widen it significantly are included.</p> <p>The proposal for a roundabout at Roodscroft militates against the requirement in NPPF 4.32 for safe and suitable access to the site as most heavy vehicle drivers coming south on the A388 find that if the traffic is busy on the A388/A38 link road they can find themselves waiting to cross on the crest of the hill and measures to increase traffic on this road must be bad for safety.</p>		<p>With regards to the highway improvements at Roods Corner and Stoketon Cross, the triggers to provide those improvements have been agreed with Cornwall Council and Highways England who are responsible for the Strategic Road Network.</p> <p>To provide the improvements detailed designs will need to be provided including drainage through a S278 application which will be safety audited to achieve Technical Approval before any works are commenced on the ground.</p> <p>Roods Corner junction improvements are being planned (with the agreement of Cornwall Council highways), for the junction to be upgraded to a roundabout junction and where final scheme design will need to be approved before construction (as per agreed planning conditions with the applicant).</p> <p>There is no current plan to incorporate a dedicated cycle/pedestrian route as part of the junction upgrade, but the improvements to the junction could enable other future initiatives to create dedicated cycle/pedestrian routes along the A388 corridor.</p> <p>The Council does not consider any modifications are required to the Saltash section of the DPD as a result of this representation.</p>
239 Mr D J Venables (CWP C	No	Transport Strategy	<p>Para 13.41 Table Sit3 Further consideration is required, over and above the information supplied in the consultation document, into the history of road construction on the Roodscroft Corner of the A388. When the new section of the A388 running north from the Roodscroft Corner to the Hatt roundabout was constructed the drainage at Roodscroft Corner was badly disrupted with run-off from the road ending up on the fields to the East of the road and overwhelming the drainage systems in the area as well as damaging the soil structure. The solution to this problem was, apparently, the belated construction of a catchment system across one of the field accesses from the old road. In view of the prospects of climate change significantly affecting the rainfall patterns in the south-west region it would be most unfortunate if this oversight was repeated when the proposed new roadworks were installed on that corner. NPPF s10.99 requires that climate change over the long-term is taken into account. It is suggested that there is no evidence that this is the case with the proposed road alterations while the present flood amelioration scheme barely copes with current rainfall; it was probably based on a design requirement of ameliorating a 2DM5 rainfall of, say, 75mm - a figure generally accepted for the area in the 1990s.</p>	<p>For the road alteration schemes on the A388 to be sound the total plan must include schemes for drainage management that avoid the casual diversion of surface run-off from the road onto the adjoining land as south of Roods corner the A388 itself intercepts surface run-off from the high ground to the west of the road. At 13.41 Insert new section into the table: To meet NPPF 10.99 recommendations prior to the design of the roundabout proposed at Roods Corner being undertaken a Drainage Management Plan (DMP) will be produced to inform the design and construction of the roundabout and the traffic calming measures proposed on the A388. The DMP will recognise that historic rainfall data may not be applicable where there is a planned installation life extending to 2030 and beyond and may need to consider the best Predicted Maximum Precipitation (PMP) data available.</p>	<p>To provide the improvements detailed designs will need to be provided (including drainage) through a S278 application, which will be safety audited to achieve Technical Approval before any works are commenced on the ground.</p> <p>The Council does not consider it necessary to make any modifications to the DPD as a result of this comment.</p>
316 Plymouth City Council	Yes	Economic Growth	<p>Para 3.13, Plymouth is described as having a "heavy influence" on Saltash. This still seems to be a fairly negative way to describe the close relationship and still implies that there is a problem to be fixed. Why not use this introductory paragraph to really spell out the links in terms of jobs, facilities, schools etc. and the way that people from Saltash and Plymouth use those facilities wherever they may be to their benefit? For example we know that residents of Plymouth work in Saltash, use the Waitrose supermarket, go to school and use leisure facilities in Saltash, and vice versa. These relationships benefit residents and businesses in both settlements and should form the basis of the key policies for Saltash.</p>		<p>The Council could amend para 3.13 to more positively reflect the links between Plymouth and Saltash as follows:</p> <p><u>"13.1 Saltash is situated on the eastern edge of Cornwall at the lowest bridging point on the Tamar River. The town acts as a gateway to Cornwall and as the main local service centre for many of the smaller settlements surrounding it. Saltash lies across the river from Plymouth and the town has a close relationship with the city. Saltash residents use the higher order facilities found in Plymouth, such as the availability or a range of employment opportunities, the schools, colleges and universities and the shops, the regional hospital at Derriford and cultural attractions in the City Centre. Plymouth residents also access Saltash for employment and facilities such as the Waitrose supermarket. A key characteristic of the town's population is the greater numbers of families with parents of a working age than retired people. Younger people tend to leave the area to seek training</u></p>
316 Plymouth City Council	Yes	The Strategy	<p>Para 13.7, whilst recognising that "the proximity of Plymouth" offers opportunities, goes on to say that "it also acts as a potential constraint to the town's economic potential". This seems far too negative and again suggests a problem to be fixed - Saltash can benefit by being presented as a potential location for investors looking for premises in Plymouth, becoming part of the city's economic offer? Saltash is walking distance from the second largest city in the SW England does not need to be a constraint; it's a huge opportunity shaping the way the town functions.</p>		<p>The Council could amend para 13.7 to more positively reflect the links between Plymouth and Saltash by amending the last sentence from:</p> <p>"Furthermore, whilst Saltash's proximity to Plymouth offers significant economic opportunities, it also acts as a potential constraint to the town's own economic potential." to,</p> <p><u>"The proximity of Saltash to Plymouth offers significant economic opportunities, for example in providing access for residents to a range of high quality jobs in locations which can be reached by public transport or other sustainable modes of travel. In addition, Saltash can also be positioned as a location for businesses which are engaging in the wider Plymouth economic growth</u></p>
316 Plymouth City Council	Yes	Economic Growth	<p>Para 13.11. The 'heavy influence' of Plymouth seems to be the guiding principle of this paragraph. Why not celebrate the relationships between Plymouth and Saltash and recognise that Saltash with Plymouth forms a sustainable location that is attractive to investors</p>		<p>The Council could amend para 13.11 to more positively reflect the relationship between Plymouth and Saltash by amending the paragraph to read:</p> <p><u>"13.11 Saltash has a close and positive relationship with the city of Plymouth, immediately to the east of the town. This relationship presents significant opportunities and benefits to the community of Saltash (for example shopping, leisure and health facilities, high value employment opportunities, further and higher level education). Nonetheless, Saltash still strives to provide additional employment opportunities within the town, to increase the opportunity for residents to both live and work within the town, in order to create a sustainable local community."</u></p>
316 Plymouth City Council	Yes	The Strategy	<p>Para 13.9. This sets out the infrastructure requirements in strategic terms of the Broadmoor Farm development. It should therefore also pick up the impact on the wider transport networks into Plymouth including western Park and Ride. Residents of the development will clearly move between Saltash and Plymouth and this should be a consideration in the planning of the extension to the town.</p>		<p>The Council could strengthen the Saltash chapter of the DPD to greater emphasise the future partnership work to examine increasing sustainable transport modes, however it is not felt appropriate within this particular paragraph but in the following paragraph; paragraph 13.10 (see response below). In addition, specific reference to a Park and Ride is not considered appropriate, as our evidence does not demonstrate that a Park and Ride is required between now and 2030 in order to accommodate the growth planned for through the plan period.</p>
316 Plymouth City Council	Yes	The Strategy	<p>Para 13.10 is welcomed. But it would be useful to expand this to set out some of the ways in which these cross boundary impacts will be recognised, reflected in policy and used to the benefit of Saltash and South East Cornwall.</p>		<p>The Council could enhance para 13.10 as follows:</p> <p><u>"13.10 Although Saltash lies within the administrative boundary of Cornwall, it is important that the cross border impacts of growth and the functional relationship with the neighbouring city of Plymouth are recognised. For example, the town's major growth area will attract people working in Plymouth and residents of the city may also work in businesses locating in the new employment areas. It will therefore also be necessary to consider improvements to transport links to/from Plymouth including a range of measures that encourage the use of all modes of sustainable transport crossing the Tamar Bridge. Such projects will contribute to strengthening the existing links with the city."</u></p>
316 Plymouth City Council	Yes	Retail Growth	<p>Retail section. The reference to Plymouth is welcomed, but again seems de minimis. Saltash in many ways functions as part of the Plymouth retail hierarchy. For residents of Saltash, Plymouth City Centre is their main destination for comparison shopping trips, and they will also travel to Plymouth to access supermarkets in the city and retail outlets at Marsh Mills. This is demonstrated by the City's Retail Study 2017.</p>		<p>The Council could enhance para 13.16 as follows:</p> <p><u>"13.16 Saltash's retail offer is naturally influenced by the wide selection of retail provision offered by Plymouth. Residents of Saltash are able to easily access Plymouth City Centre, which has a wide and comprehensive range of retailers, as well as other retail outlets at locations such as Marsh Mills and the large supermarkets present within the city. Provision locally within Saltash complements the retail offer in Plymouth, and is split between the town centre, which sits on the east of the town, and the out of town convenience offer, which is located near to Carkeel; at Carkeel, land immediately the north-east and south-east of Carkeel Roundabout and outside of the safeguarded employment areas SLT-E4 and SLT-E5, is either already occupied by large national retailers or is planned to be. Because these are prime economic sites it is important to the town that retail/employment</u></p>
316 Plymouth City Council	Yes	Housing	<p>Para 13.23 - reference to impacts on the Plymouth road network is welcomed.</p>		Noted.
316 Plymouth City Council	Yes	Other	<p>Para 13.26 - reference to infrastructure impacts in Saltash and Plymouth is welcomed.</p>		Noted.
316 Plymouth City Council	Yes	Utilities	<p>Para 13.33 -Unaware that any discussions have been had with the City Council regarding the capacity of the sewage treatment plant at Ernesettle. What impact would any changes to the plant have on Plymouth, and have the additional impacts of growth in Plymouth been factored into your discussions with SWW? Has the City Council's Infrastructure and Investment team been made aware of these discussions, as unaware that improvements to Ernesettle are included in our Infrastructure Needs Assessment</p>		<p>The Council liaised with SWW in preparing the strategy text. Since the close of the consultation the Council has re-engaged with SWW who has confirmed that growth for both south east Cornwall and Plymouth is factored into their assessment of future capacity. SWW has confirmed that proposals are being progressed which are in line with the existing strategy text.</p> <p>As the Council has engaged with SWW with regards to growth in both areas, it has been assumed that Plymouth City Council has done similar.</p> <p>The Council does not consider it necessary to make any modifications to the DPD as a result of this comment.</p>

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316 Plymouth City Council	Yes	Transport Strategy	Para 13.36. PCC believes that this paragraph on Transportation requires a rethink. Firstly, although the figures of 9,000 trips a day between SE Cornwall and Plymouth is recognised, we suggest these figures do not reflect reality. The figures come from the 2011 census. Do you have traffic modelling for SE Cornwall which show in detail the flows to Plymouth from the towns of SE Cornwall, and do these tell a different story? Do you have information on trips by train and bus from the wider area? Most mornings, it is clear that there is congestion on the A38 at most junctions from Trerulefoot to the bridge, and trains from Liskeard to Plymouth are frequently standing room only. Only focusing on commuting movements clearly means that other daily trips to Plymouth by students, schoolchildren, hospital patients and others are not factored in, and seems to again try to downplay the relationships that exist.		The Council could enhance para 13.16 to better reflect our data as follows:  "13.36 Situated on one of two trunk roads into Cornwall, Saltash is the gateway to Cornwall from Plymouth <u>and for other users of the A38</u> . There are over 9,000 daily commuter trips between South East Cornwall and Plymouth, and the vast majority of these are from Saltash. <u>Total daily eastbound and westbound flows through Carkeel junction reach around 14,000 in each direction. During the AM peak the dominance of east bound trips through the junction is clear (approximately 3,500 compared to 2,400 westbound)</u> . This is partly due to an imbalance between housing and jobs in the town with 43% of the town's working population commuting to Plymouth. This presents a challenge in reducing the number and length of trips generated in the town. The high frequency of bus services to Plymouth makes bus more attractive than rail for commuting. Consequently the rail network is underutilised (1% of the town's working population travel to work by rail). Despite the strong bus network, 67% of travel to work trips are still made by car. The demand to travel to Plymouth for employment and shopping puts pressure on the Tamar crossings and the road network on both sides of the River Tamar. Recent study work has identified a number of capacity improvements to the bridge and surrounding network capacity that will be required in the longer term. This includes
316 Plymouth City Council	Yes	Transport Strategy	Para 13.36 states clearly that the DPD aspires to reduce the number of people commuting to Plymouth from Saltash. We have reservations about this approach, and I would have to ask why this is an aspiration of the plan? Given the number of jobs available in Plymouth that residents of Saltash can easily and conveniently access, and the spending power that these residents then have in Saltash, why would you wish to weaken this relationship?		Para 13.36 presents a background to the transport strategy for Saltash and sets the scene for the need to develop a more sustainable transport strategy for the town (and its links to Plymouth). Whilst the overall strategy for Saltash does refer (e.g. at paragraph 13.11) to the fact that Saltash strives to provide additional employment opportunities within the town, it is not unreasonable for any settlement to aspire to be more self sufficient in this way.  The Council does not consider it necessary to make any modifications to the DPD as a result of this comment.
316 Plymouth City Council	Yes	Transport Strategy	Para 13.36 The references to public transport links to Plymouth are welcomed, but why does this narrative not lead to a conclusion that it would be best to work with the City Council to improve public transport and other alternative travel modes between Saltash and Plymouth, including the beneficial impact to both the Plymouth and Cornwall transport networks of a western park and ride in Saltash? This paragraph seems to seriously downplay the cross boundary transport issues that exist, and also seems to ignore the good joint work on evidence which is ongoing between the two authorities. The strategic role of the A38 and the Tamar Bridge is part of the work programme of the Transport Strategy Working Group (TSWG) which was established from Feb 2016 to facilitate joint working of the Highway Authorities covering the Plymouth TTWA: PCC, CC and Highways England. CC commissioned a Tamar Crossings Travel Analysis Study (2017) and PCC and CC have commissioned jointly a SE Cornwall and Plymouth Travel Demand Management Option Study to investigate the potential and possible options for effectively managing travel demand along this strategic transport corridor.		The Council could strengthen the references to the joint working which is ongoing between the two authorities by making the following amendments to the Saltash Chapter:  New para 13.37 " <u>Cornwall Council and Plymouth City Council share the ambition to increase levels of walking and cycling and recognise the importance of partnership working between the Local Authorities as being essential to try to solve common issues across the travel to work area. The proximity of Saltash to Plymouth, 5 miles, or 42 minutes by bicycle, suggests there is a significant opportunity to encourage an increase in non-motorised trips, in particular bicycle based trips. Although the Tamar Bridge provides a crossing, recent studies suggest there are gaps in network provision on both sides of the bridge, particularly in terms of linking key destinations. It is through this joint ambition that Cornwall Council and Plymouth City Council will seek to develop a sequenced programme of future investment.</u> "  Within Table Sit3, additional comment for Rail Infrastructure (Station frontage and access improvements) to say " <u>Cornwall and Isles of Scilly Local Enterprise Partnership (LEP) have committed £0.5m towards Plymouth's scheme to increase capacity and upgrade passenger facilities at Plymouth station.</u> "  Within Table Sit3, additional comment for Rail Infrastructure (Rail service improvements) to say " <u>From December 2018, the Great Western Franchise includes a requirement to provide 2 trains per hour between Plymouth and Penzance including 2 trains per hour calling at Liskeard, St Germans and Saltash stations.</u> "  Within Table Sit3, additional comment for Bus Improvement (Bus services and infrastructure/RTPI) to say " <u>Investigate feasibility and demand for a Western Corridor Park and Ride (to/from Plymouth) to help manage demand for travel across the Tamar.</u> "  Within Table Sit3, additional comment for Walking/cycling improvements to say " <u>Cornwall Council and Plymouth City Council will continue to work together to develop a prioritised programme of investment to improve walking and cycling links between key destinations in Saltash and Plymouth.</u> "  Enhanced para 13.43 (44) to say " <u>Cornwall Council will continue to work with Plymouth City Council to identify opportunities for managing existing and future demand for travel between Plymouth and South East Cornwall in a sustainable way. The commitment to this joint working is demonstrated by Cornwall Council and Plymouth City Council jointly commissioning in 2017 a South East Cornwall and Plymouth Travel Demand Study, investigating the potential and possible options for effectively and efficiently managing travel demand along the strategic A38 transport corridor across the Tamar. Future improvements could include a western corridor Park and Ride facility and improved cycling infrastructure to serve both the communities of Cornwall and Plymouth.</u> "
316 Plymouth City Council	Yes	Transport Strategy	Questions that need to be answered from the study are:- • How do we address capacity constraints on the Tamar Bridge / Saltash Tunnel through modal shift for trips to the principal eastbound (Derriford) and westbound (Saltash /Carkeel) destinations? • What is the potential for (1) bus (2) park and ride (3) rail (including park and rail) and (4) active travel – in isolation and combination – for trips from SE Cornwall to locations north of the A38 in Plymouth, particularly Derriford? • What is the impact of modal shift, eastbound, on Manadon Junction? • What is the potential for (1) bus (2) park and ride (3) rail (inc. park and rail) and (4) active travel – in isolation and combination – for trips from SE Cornwall to locations to the city centre? • What is the potential for (1) bus (2) park and ride (3) rail (inc. park and rail) and (4) active travel – in isolation and in combination – for trips from Plymouth to locations in SE Cornwall? • What is required to achieve this potential?		Noted. However these questions will be answered as part of ongoing work and the Council does not feel its necessary to cover these aspects within the Allocations DPD.
316 Plymouth City Council	Yes	Transport Strategy	Para 13.40. This paragraph could usefully reflect that CC and PCC have submitted a bid to DfT last month (July 2017) for technical support to develop a programme of cycling and walking investment to promote sustainable, active travel opportunities between key destinations in Plymouth and Saltash.		The Council could include the following amendments:  New para 13.37 " <u>Cornwall Council and Plymouth City Council share the ambition to increase levels of walking and cycling and recognise the importance of partnership working between the Local Authorities as being essential to try to solve common issues across the travel to work area. The proximity of Saltash to Plymouth, 5 miles, or 42 minutes by bicycle, suggests there is a significant opportunity to encourage an increase in non-motorised trips, in particular bicycle based trips. Although the Tamar Bridge provides a crossing, recent studies suggest there are gaps in network provision on both sides of the bridge, particularly in terms of linking key destinations. It is through this joint ambition that Cornwall Council and Plymouth City Council will seek to develop a sequenced programme of future investment.</u> "  Within Table Sit3, additional comment for Walking/cycling improvements to say " <u>Cornwall Council and Plymouth City Council will continue to work together to develop a prioritised programme of investment to improve walking and cycling links between key destinations in Saltash and Plymouth.</u> "
316 Plymouth City Council	Yes	Transport Strategy	Para 13.41. Reference in the table to rail improvements and Western Park and Ride is insufficient. The fact that PCC and CC have just commissioned jointly a SE Cornwall and Plymouth Travel Demand Management Study demonstrates that we are more than just exploring opportunities but actually doing the work. This should included as part of the Saltash Chapter. See 13.43 below.		The Council could strengthen this aspect of the Saltash Chapter:  Within Table Sit3, additional comment for Rail Infrastructure (Station frontage and access improvements) to say " <u>Cornwall and Isles of Scilly Local Enterprise Partnership (LEP) have committed £0.5m towards Plymouth's scheme to increase capacity and upgrade passenger facilities at Plymouth station.</u> "  Within Table Sit3, additional comment for Bus Improvement (Bus services and infrastructure/RTPI) to say " <u>Investigate feasibility and demand for a Western Corridor Park and Ride (to/from Plymouth) to help manage demand for travel across the Tamar.</u> "  Enhanced para 13.43 (44) to say " <u>Cornwall Council will continue to work with Plymouth City Council to identify opportunities for managing existing and future demand for travel between Plymouth and South East Cornwall in a sustainable way. The commitment to this joint working is demonstrated by Cornwall Council and Plymouth City Council jointly commissioning in 2017 a South East Cornwall and Plymouth Travel Demand Study, investigating the potential and possible options for effectively and efficiently managing travel demand along the strategic A38 transport corridor across the Tamar. Future improvements could include a western corridor Park and Ride facility and improved cycling infrastructure to serve both the communities of Cornwall and Plymouth.</u> "  It should be noted however that our evidence does not demonstrate that a Park and Ride is required between now and 2030 in

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316 Plymouth City Council	Yes	Transport Strategy	Paragraph 13.43. Inclusion of a reference to the western corridor park and ride is warmly welcomed. Nevertheless, we would raise a concern about the level of commitment implied. Given the points raised in paragraph 13.36 and my comments above, I would suggest that the park and ride is one response to the wider strategic cross boundary issue of transport movements between Plymouth and SE Cornwall, and therefore would be a key strategic element of Cornwall's transport strategy to unlock growth potential in SE Cornwall well before 2030. It would clearly represent a major improvement to public transport links between Saltash and Plymouth contributing to reducing car trips over the crossings – which has been highlighted as a problem for the area. The transport networks in SE Cornwall are part of the wider Plymouth TTWA transport networks, and therefore Transport issues in SE Cornwall cannot be considered in isolation from those in Plymouth. We would therefore ask that it is described as a joint project benefitting residents of Plymouth and SE Cornwall, and that it should be included in Table Sit3 reflecting the importance placed on the park and ride in the City Council's INA, and in the Plymouth and South West Devon JLP (which was submitted in July 2017)		<p>The Council disagrees that a Park &amp; Ride facility is required in order to support the planned growth for the period to 2030. However, acknowledging the likely longer term need, the Council is happy to strengthen the Saltash Chapter as follows:</p> <p>Within Table Sit3, additional comment for Bus Improvement (Bus services and infrastructure/RTP1) to say <u>"Investigate feasibility and demand for a Western Corridor Park and Ride (to/from Plymouth) to help manage demand for travel across the Tamar."</u></p> <p>Enhanced para 13.43 (44) to say <u>"Cornwall Council will continue to work with Plymouth City Council to identify opportunities for managing existing and future demand for travel between Plymouth and South East Cornwall in a sustainable way. The commitment to this joint working is demonstrated by Cornwall Council and Plymouth City Council jointly commissioning in 2017 a South East Cornwall and Plymouth Travel Demand Study, investigating the potential and possible options for effectively and efficiently managing travel demand along the strategic A38 transport corridor across the Tamar. Future improvements could include a western corridor Park and Ride facility and improved cycling infrastructure to serve both the communities of Cornwall"</u></p>
316 Plymouth City Council	Yes	Transport Strategy	I would highlight that although the most obvious relationship between the city and Cornwall concerns Saltash, there are also relationships between the city and Torpoint, Rame Peninsula (Mt Edgcumbe and Cremyll), and further into SE Cornwall along the A38 corridor. In the context of the Plymouth and SE Cornwall Joint Local Plan (submitted in July 2017), there are also clear links between Tavistock and Callington (eg the World Heritage site), and between parts of West Devon and Launceston. Clearly there is a need to work together in the delivery of our plans over time to take account of these relationships (as we set out in SPT7 of the Joint Local Plan). More specifically, it would be helpful if the DPD could also set out the interventions that could be examined along the A38 corridor between Bodmin and Plymouth – as you have clearly noted this is a key trunk road link into Cornwall. For example, we have noted as part of the text to SPT7 of the Joint Local Plan the potential for coordinated sustainable travel programmes reaching into SE Cornwall potentially including new rail stations and park and rail at locations such as Trerulefoot, and better use of existing stations at Liskeard, Menheniot, St Germans and Saltash. These statements have arisen from discussions at the Plymouth Transport Strategy Working Group, and as indicated above are the subject of joint studies which have been commissioned.		<p>The Council acknowledges the need to work with neighbouring authorities, not only with regards to Saltash but with regard to the wider links between parts of West Devon and Cornwall. However, the Council does not consider it appropriate to cover these areas within the Allocations DPD which focuses attention of Site Allocation policies.</p> <p>The trunk road network that connects Saltash and Plymouth also serves a number of settlements in South East Cornwall. Cornwall and cross border network issues and opportunities for improvement will continue to be managed at a strategic level with Plymouth CC and Highways Engalnd.</p> <p>The Council does not consider it necessary to make any modifications to the DPD as a result of this comment.</p>