

# **FALMOUTH NEIGHBOURHOOD DEVELOPMENT PLAN**

## **PRE-SUBMISSION CONSULTATION – DECEMBER 2106 TO MARCH 2017**

### **SUMMARY OF RESPONSES**

#### **Stakeholder Group Meeting 5th April 2017**

##### **NOTE TO STEERING GROUP**

**This document contains the comments made by the community, statutory bodies, local and regional organisations, developers, and Cornwall Council during the Regulation 14 Pre-submission Consultation held from December 2016 to March 2017. The Stakeholder Group's response will be given in a separate document to be prepared later.**

## INTRODUCTION

This document records the comments made on the Falmouth Neighbourhood Development Plan verbatim, and allocates a look-up reference number so that the response to each comment may be found in the main Response Report document.

**Note Responses are coded as follows:**

**A – Statutory Organisations**

**B – Local & Regional Organisations**

**C – Community**

**D – Developers**

**E – Cornwall Council Officers**

### **Summary:**

Overall the intentions and strategy of the draft Falmouth NDP has been well supported by the local community, local organisations and statutory bodies. The comments received provide the basis for the Plan to be constructively amended to produce a local planning strategy that reflects local needs and aspirations.

**Statutory Organisations:** *Natural England* and *Historic England* share a concern as to how the plan presents its policies and proposals, pointing to a difficulty in understanding the difference between ‘policies’ and ‘policy proposals’, and the status of the list of urban capacity sites, but both provide helpful suggestions. NE point out that the proposed pontoons in the Church street regeneration policy (TC1) require a Habitats Regulations Assessment and thereby a full SEA, as does policy BE1 in favour of the Dredge. HE says that the Fig 25 and Policy HR6 are tantamount to suite allocations and therefore would require a Heritage Impact Assessment, and SEA. Both organisations give advice on mapping issues. **The Homes & Communities Agency** support the proposed mixed use redevelopment of the TA Car Park site, whilst **Network Rail** draw attention to their Western Routes Study and the need to ensure that they are consulted on new development proposals. **SWW** say that where new developments require improvements to be undertaken these will be secured through planning conditions they would request Cornwall Council to impose.

**Local Organisations:** Broad support is expressed by the local organisations that responded, subject to details in some areas. The **NMMC** support plan for enhancement of The Moor (BE4), calling for complementary and joined-up programming to take place at both ends of the town, encouraging visitors and residents to travel through the town and re-enforcing their sense of place. It asks that the NMMC development plans should be included in the NDP, and

that more attention should be given in the Plan to tourism and its cultural aspects. Finally, they ask to be a part of the Stakeholder Group. **A&P** support the vision and aims, but are concerned about the relationship of urban capacity sites C.31 (Melville Road Sidings) and C.34 (Ocean Bowl) to the docks, and the possibility that their redevelopment for accommodation could restrict the potential of the docks to develop. It is suggested that instead they sites could be safeguarded for marine related employment. A&P also call for clauses relating to the same impacts should be included in HMO2 and HMO3, and for policy BE12 on the Dredge to be strengthened. **Transition Falmouth** feel that the 'long-term' objective with the 2030 focus has been neglected, in that plan appears lacking in detail and practical objectives regarding the effects of Climate Change and the challenges of Global Energy and Food Security.

**Falmouth Liberal Democrats** support the Plan's vision of Falmouth, but say the Neighbourhood Plan needs to be consistent with the forthcoming DPD revisions. In considering the potential of town centre sites for housing of any kind, the implications for traffic flow along the main street are critical as any additional vehicle flow will work directly counter to the Plan objective of improving the town centre environment. Support for the A4D and related NDP policies is expressed, suggesting that the zone in which no further HMO conversions zone would be allowed should be extended to include an area surrounding of Penmere Hill, Kings Avenue and Tregenver Road. It is also suggested that Policy HMO3 be amended to remove 'close to the Town centre and' from paragraph 1a, and replace it by 'that do not impinge on existing residential areas'. The use of the Penwerris Lane site, the Ocean Bowl site, the Rosslyn Hotel site or the Four Winds site for PBSA does not appear appropriate. The town centre regeneration objectives are seen as strong positive features, but that at least until alternative parking arrangements are in place, it would be desirable for the regeneration of the waterfront to be phased to retain an area of general public car parking in Church Street. The New Street car park might also provide scope for deck or multi-storey parking as suggested on the Quarry and TA sites. Policy BE5, for the skatepark at Dracaena Fields, is warmly endorsed. Policy HA1 of the draft plan to support proposals for the regeneration of the Falmouth Community Hospital and Health Centre to retain and extend their health and social use is seen as being of vital importance, but should be strengthened to further affirm support for preservation of the existing services and health care provided at the Falmouth Community Hospital site, including the retention and enhancement of Boscawen Ward and the Minor Injuries Unit.

**Falmouth Afoot** reiterate the need to enforce existing traffic regulations and as they are part of the town centre strategy, saying it would be helpful if the Plan included practical ideas as to how such enforcement could be accomplished. **Save our Falmouth** suggest that more could be said to safeguard and support tourism, and encourage improved town centre 'offer'. The need to align with the DPD is stressed, as is opposition to purpose built student accommodation which should be close to the Campus. Community facilities such as the Rugby club and Adult education centre should be protected from enabling development, whilst Falmouth Hospital and Healthcare Facilities should be safeguarded, and greater investment made in transport.

**Community Responses:** Generally, a well-informed and intelligent response which shows a depth of concern by residents for the future of their town. Overall the vision and strategy of the NDP is supported, subject to some caveats around the detail on how it will be delivered. The strongest support is for the Environment and Open Space proposals. The Town Centre strategy is also well supported, and there is clear enthusiasm for measures that will enhance its function, improve pedestrian movement, and extend the range and quality of shopping opportunities offered. This is balanced with concerns about how the needs of residents for town centre parking will continue to be met. The Business and Employment policies receive backing, amongst which there are calls for more emphasis to be given to measures to support tourism. On Housing, the focus of comments is on student accommodation. The A4D and

associated policies are strongly supported, but there is also concern from some as to the 'knock-on' impact on adjoining areas, whilst current landlords (who are also clearly local people) express concerns about the business impact of the A4D and how it will be implemented in practice. Purpose built student accommodation is strongly opposed, notwithstanding the contribution it would make to achieving the town centre strategy. Several responses have also identified technical issues with the document, such as typos, mapping errors etc, all of which are very helpful.

**Developer Responses:** *Studios Ltd* support the vision of the Plan and note that the Rosslyn site is identified in Fig 25 for housing, but feel that it should be identified for purpose built student accommodation as well. They say that the Plan should be broader in its consideration of student accommodation, both in its location and variety of accommodation types and provide the opportunity for students to live 'off campus' rather than encourage students to live on site so there should be the ability for non-identified sites to come forward, off campus, that are well placed and sustainable to provide student accommodation and provide freedom of choice in the accommodation market as not all students wish to live on campus. Policy HMO3 is consequently supported apart from the more restrictive clauses. *Amethyst Planning* argue for the inclusion of the former oil storage sites at Middlepoint (ref D36) and Castle Drive (D38/D39), which they say are redundant, contaminated, brownfield sites in sustainable locations where sensitive schemes could tackle the contamination and deliver new housing. *One Red's* representation relates to the former Four Winds Inn and Garage/Depot site, and also support policy HMO3, apart from the more restrictive clauses.

*Maenporth Estate* note that the Falmouth area of the Boslowick Ward does not come within the NDP Designated Area, and ask that it should be as they are considering possible long term improvements to the cafe and surrounding area and would welcome input from the local community. *Lewis Haughton Wills Ltd* pose a number of questions about how the A4D and associated policies will operate, as do several landowner/residents

**Cornwall Council Officers Response:** Cornwall Council point out an error in the area designation map, so that part of Penryn Parish is included in the NDP area designation, and suggest a helpful resolution process.

Reflecting the views of statutory consultees, CC note that the 'policy proposals' covering land outside Falmouth are confusing and suggests that they are better suited to a broader 'development approach to securing sustainable communities' statement in the NDP relating to developments in and around the NDP area of the town. Referring to Fig 25 and policies H6 & 7, it is noted that the wording has caused statutory consultees - Historic England (HE) and Natural England (NE) to judge that the plan requires Strategic Environmental Assessment which could be resolved by having a general policy about support of infill and brownfield development and moving the list of sites to supporting evidence. In order to avoid SEA it is suggested that the policy supporting the Dredge be replaced with a supporting statement, and perhaps a reference to the Port Master Plan. To be in conformity with the revised DPD strategy for student accommodation, the NDP will need to be amended. Several helpful general comments are also given on more technical aspects.

**Appendix A.**

**Pre-submission consultation (Regulation 14) Consultee Comments and Reference Look-Up: Statutory Organisations**

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

<b>Statutory Organisation</b>	<b>Comment Received</b>	<b>Reference Look-Up</b>
Natural England	<p><b>General Comments</b></p> <p>We acknowledge that a lot of hard work has gone into the preparation of the Neighbourhood Plan and the Neighbourhood Plan Stakeholder Group is commended in seeking to address the issue of planning for housing and employment provision. We recognise that this is a complex and often lengthy task.</p> <p>Our detailed comments are set out below and we hope you find these useful in shaping a precise and robust policy document. Many of our comments seek clarification about which sites are to allocated as one of our main concerns is that the Plan is not sufficiently clear and unambiguous on this issue. It is really important that policy is drafted with sufficient clarity to enable a decision maker to apply your policies with confidence when determining planning applications.</p> <p><b>Site Allocations</b></p> <p>The Plan appears to be unclear about which sites are allocated for development. We are therefore unable to comment on site specific allocations at this stage. We look forward to clarification on this matter.</p> <p>Where a site is to be allocated in the Neighbourhood Plan it should be identified on a plan accompanied by a policy which expressly identifies the site. The policy may also include specific criteria to guide the nature and design of the development.</p> <p>If the Neighbourhood Plan is not proposing to include sites for development this should be made clear in the Plan text.</p>	<b>A1</b>

Statutory Organisation	Comment Received	Reference Look-Up
	<p>Under specific comments below are set out instances where the Plan lacks clarity about site allocations. We hope these detailed comments are useful in identifying where policy wording and site allocations could be more definitive.</p> <p><b>Need for Habitats Regulations Assessment (HRA)</b></p> <p>Proposed Plan policy (TC1 and BE1 in particular) trigger the need for a Habitats Regulations Assessment as the proposals put forward may have a likely significant effect on the Fal &amp; Helford Special Area of Conservation (SAC) which is of European importance for biodiversity.</p> <p>In accordance with Schedule 2 of the Neighbourhood Planning (General) Regulations 2012 a neighbourhood plan cannot be made if the likelihood of significant effects on any European Site, either alone or in combination with other plans and projects, cannot be ruled out.</p> <p>The need for Habitats Regulations Assessment automatically triggers the need for Strategic Environmental Assessment (SEA).</p> <p><b>Sites of biodiversity and geodiversity interest</b></p> <p>The Neighbourhood Plan should show sites of designated value for biodiversity and geodiversity interest. Within/adjacent to the Plan area are sites of European and national importance. More detailed comments on this issue are set out below.</p> <p><b>Detailed specific comments</b></p> <p>Key development areas, page 17. A number of sites are referred to under headings such as "Periphery", "Town Centre" &amp; "individual urban sites" ...etc. It is assumed that these relate to sites considered previously for allocation in the Plan rather than referring to actual allocations. Clarification on this is sought.</p> <p><b>Figure20, strengthening communities map (page18).</b></p>	

Statutory Organisation	Comment Received	Reference Look-Up
	<p>This plan shows a series of sites edged in red. Clarification is sought on the status of these sites and whether they are Neighbourhood Plan allocations. It is noted that a number are proposed allocations in Cornwall Council's emerging Allocations Development Plan Document (DPD). It is important that these are not confused with site allocations in your Neighbourhood Plan.</p> <p>A number of the sites edged in red and section of circles in blue lie outside the Neighbourhood Plan area. Whilst cooperation with adjoining neighbourhood plan areas is encouraged, these proposals will need to be addressed by those adjoining neighbourhood plans.</p> <p>Figure 21 shows a series of sites annotated MJ2–MJ5. These would appear to be site allocation proposals. However no policy could be found referring specifically to these named sites. Clarification on the status of sites MJ2 – MJ5 is sought.</p> <p>Figure 2: Green spaces strategy map. The legend identifies a series of different land uses annotated FS.09 – FS.17. It appears that these may be existing facilities/elements of green infrastructure but the title implies they form part of a Plan strategy. Clarification on the status of these sites is sought and whether the Plan includes policy relating to these areas. The Plan did not appear to include a policy referring to sites FS09 – FS.17.</p> <p><b>Housing &amp; Regeneration (page 22).</b></p> <p>Under the heading 'Policy Justification'. Refers to two sites allocated in Cornwall Council's emerging 'Site Allocations Development Plan Document' (FP-H2 (Falmouth North) and FP-H3 (Kergillack (phase 2)). This paragraph also implies that the corresponding sites included within the neighbourhood plan have differing (slightly extended) boundaries. The Neighbourhood Plan should be clear on the area to be allocated in the Neighbourhood Plan and distinguish this from the area allocated in the Council's DPD.</p> <p>Policy HR1: General requirements for Falmouth Urban Expansion developments</p> <p>This policy appears to relate to land outside the designated Neighbourhood Plan area and therefore appears to be a matter for a relevant adjoining Neighbourhood Plan.</p>	

Statutory Organisation	Comment Received	Reference Look-Up
	<p><b>Policies HR2, HR3, HR4 &amp; HR5.</b></p> <p>Clarification is sought on the areas to which these policies relate. The areas should be shown and annotated on a numbered plan and the plan referred to in the policy. The policy should be clear about the area to be allocated and any accompanying criteria that would apply to development at Urban capacity/infill housing and regeneration. Figure 25 lists a series of urban capacity and regeneration sites and the first paragraph of the corresponding policy justification states that “the sites identified for housing have the potential to add up to 240 dwellings”. Where sites are allocated for housing in the Neighbourhood Plan these need to be clearly identified on a plan and specifically referred to in an associated policy. The statement on page 25 also appears to conflict with on page 26 in that it states “it is not the intention of the Neighbourhood Plan to allocate these for housing development or identify site specific planning policies for them”. Clarity about the identification of urban capacity/infill housing is sought.</p> <p>Policy HR6 &amp; HR7: Urban capacity/infill sites. Clarification is sought on whether it is the intention to include these sites as allocations in the Neighbourhood Plan. The policy also refers to issues identified in a separate report.</p> <p><b>Town Centre: page 34</b></p> <p>The under ‘policy justification’ refers to the “Quarry” and “Former TA” sites identified in the emerging Cornwall DPD. It would be useful if the full site reference in the DPD could be used to avoid confusion. There does not appear to be site referred to as ‘TA site’ in the Cornwall Allocations DPD.</p> <p>PolicyTC1: Church Street Carpark. The location of this proposal should be shown and annotated on a plan and the relevant plan referred to in the policy. The creation of new accessible pontoons may have a likely significant adverse effect on the Fal and Helford Special Area of Conservation (SAC). The implications of including this policy will therefore need to be subject to a Habitats Regulations Assessment and any findings reflected in a Strategic Environmental Assessment and Plan policy.</p> <p>PolicyTC3: Former TAsite. The full site reference to the site allocated within the emerging Cornwall DPD should be given.</p> <p><b>Policy BE1: Supporting the harbour, port and docks</b></p>	



Statutory Organisation	Comment Received	Reference Look-Up
	<p>Dredging of the harbour may have a likely significant adverse effect on the integrity of the Fal and Helford SAC which is of European importance for biodiversity. A policy supporting this operation will therefore need to be subject to a Habitats Regulations Assessment and any findings from that assessment reflected in a Strategic Environmental Assessment and Plan policy. However we question whether inclusion of such a policy is within the jurisdiction of the Neighbourhood Plan which, as a land-use plan, can only extend to the low watermark. We suggest that this issue is discussed with Cornwall Council.</p> <p>This policy also supports development which “maximises the economic value of the dredge to marine engineering and maritime tourism”. Clarification on the type and potential location of development envisaged is sought and whether site(s) are to be allocated/safeguarded in the Neighbourhood Plan for this purpose. Where proposals may have likely significant effects on the SAC they too will need to be subject to Habitats Regulations Assessment.</p> <p><b>Environment and Open Space</b></p> <p>Within or lying directly adjacent to Neighbourhood Plan area are a number of sites recognised of international, national and local importance for biodiversity/geodiversity. These include the following:</p> <ul style="list-style-type: none"> <li>• Fal and Helford Special Area of Conservation (SAC)</li> <li>• Swanpool Site of Special Scientific Interest (SSSI)</li> <li>• Priority Habitats for woodland, maritime cliffs &amp; slopes etc.</li> </ul> <p>These sites should be referred to in the Plan and their location shown. Further information regarding these sites can be found on <a href="http://www.magic.gov.uk">www.magic.gov.uk</a></p> <p>Local Wildlife Sites should also be identified. Their location can be found on Cornwall Council’s interactive mapping service: <a href="https://map.cornwall.gov.uk/website/ccmap/?zoomlevel=1&amp;xcoord=187430&amp;ycoord=64380&amp;wsName=ccmap&amp;layerName=">https://map.cornwall.gov.uk/website/ccmap/?zoomlevel=1&amp;xcoord=187430&amp;ycoord=64380&amp;wsName=ccmap&amp;layerName=</a></p> <p>The Fal and Helford SAC is at risk from recreational disturbance. This matter is addressed in Cornwall Local Plan Policy and an accompanying and emerging Supplementary Planning Document (SPD) titled “European Sites Mitigation Strategy Supplementary Planning Document”. An appropriate off-site contribution will be required to</p>	

Statutory Organisation	Comment Received	Reference Look-Up
	<p>mitigate against adverse recreational impacts (arising from occupants of housing, student/tourist accommodation) on the Fal and Helford SAC. This will need to be agreed and secured prior to approval of the development. The level of contribution and details of the specific measures are set out in the European Sites Mitigation Strategy Supplementary Planning Document". You may wish to make reference to this issue in the Neighbourhood Plan to ensure developers are aware of their obligations in this respect.</p> <p><b>Policy FOS4 – Green corridor and garden walk</b></p> <p>The inclusion of this policy is welcomed. However for clarity the policy should refer to the plan showing the areas identified (i.e. Green corridor and Garden walk in Fig 22).</p> <p>The Cornwall Area of Outstanding Natural Beauty (AONB) lies adjacent to the south west boundary of the Plan area. It is important that the proximity of the AONB is reflected in the Plan.</p> <p><b>Policy FOS 7- municipal facilities</b></p> <p>This policy refers to land outside the designated Neighbourhood Plan Area. It will be for the adjoining community to allocate land falling within their neighbourhood plan area. It may be appropriate for provision for facilities that serve more than one Neighbourhood Plan Area to be addressed in the Cornwall Site Allocations DPD. It is suggested that this issue is discussed with Cornwall Council. We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.</p> <p>For any queries relating to the specific advice in this letter only please contact Carol Reeder on 01872 479570/479588 or carol.reeder@naturalengland.org.uk. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.</p>	
Environment Agency	No Response	<b>A2</b>
Home and Communities Agency	Page 38 - TA Site - The site is within the ownership of the Homes and Communities Agency and revenue from the car park supports the NMMC. Any redevelopment should seek to retain car parking and in order to aid viability and deliverability a mixed use scheme should be supported in the Plan. This could be housing, but it could also be retail or a hotel, subject to the other policies within the Plan.	<b>A3</b>

Statutory Organisation	Comment Received	Reference Look-Up
Historic England	<p>Thank you for your consultation on the emerging Falmouth Neighbourhood Plan. Other than offering initial generic advice at the time the Plan area was designated this is our first opportunity to engage meaningfully in this Plan preparation process. Our congratulations on the progress made thus far.</p> <p>We have therefore taken the opportunity to look at the Plan in detail and are impressed by its sophistication and depth and scope of coverage. We are pleased that Section 11. on Design Policies includes references to local distinctiveness and the historic environment. The area is nationally important from a heritage perspective based on its historical maritime role and historic character and this is reflected in its rich schedule of designated heritage assets – the Plan area contains 2 Scheduled Ancient Monuments, 2 Grade I, 15 Grade II* and 198 Grade II Listed Buildings, 1 Registered Park and Garden, and 1 Conservation Area. The area also contains 3 sites on the national heritage At Risk Register. It is well that the plan recognises both this significance as well as the area’s sensitivity to change.</p> <p>Our interest focuses on policies and proposals in the Plan for new development and particularly the allocation of sites. We note that the Plan seeks to protect and enhance the town’s unique architectural heritage and its setting (p3) while at the same time setting higher housing densities (p22). There is clearly potential for tension between these two objectives and site allocations in particular will need to keenly demonstrate that they are suitably informed by an understanding of relevant heritage considerations.</p> <p>Housing site allocations are contained within Section 5. Of the Plan. We gather from comments made by Cornwall Council in the SEA Screening Report that policies HR 1 – 5 are outside the Plan area. We assume that these may well be deleted but at the least we have assumed that they have no status for the purposes of the current exercise.</p> <p>Policies HR 6 &amp; 7 refer to a schedule of sites (Figure 25, p25) which have been identified as having the best potential for sustainable development should they become available. At the same time p26 states that it is not the intention to allocate these sites for development or identify site specific planning policies for them. Further, reference is made to the sites delivering between 160-240 dwellings at densities of between 70dph – 120dph. There is an inherent contradiction in the status which this alludes to, and an unhelpful ambiguity in terms of the degree of materiality which the Plan intends this provision to possess. At present it could reasonably be interpreted that the</p>	A4

Statutory Organisation	Comment Received	Reference Look-Up
	<p>Plan is formally asserting that the sites are in principle suitable for development and delivering the uses suggested for them – a position which requires demonstrable evidence .</p> <p>The Plan refers for evidence to Sections B &amp; C of the Strategy and Housing Group Report. This includes individual summary appraisals for each site, identifying heritage considerations and assets in some cases and in others simply stating that they were “not known”. Where designated heritage assets have been identified it is not clear that an understanding of their significance has been determined or how this has been used to inform the proposals for each site which has emerged. In some instances it has been recognised that sites have a high degree of heritage sensitivity but proposals for development have been promoted nonetheless. The Report also states that the National Planning Policy Framework (NPPF) has been used but doesn’t state how.</p> <p>The Sustainability Checklist uses a traffic light methodology to assess the policies against sustainability criteria which include the historic environment but there is no information to substantiate the outcomes which have been concluded.</p> <p>Section 6. on The Town Centre includes policies allocating three sites for development: TC 1 – 3. The evidence for these is contained in the AECOM Town Centre Sites report June 2016 but this doesn’t contain any reference to (ie evidence on) the historic environment.</p> <p>Policy BE 1 supports the principle of the dredging of the harbour, work which may well have potential to impact upon marine archaeology and require an MMO.</p> <p>In summary, we would advise that policies HR 6 &amp; 7 be rationalised – either further qualified or deleted, or converted into formal site allocations with the necessary heritage evidence to support them and any associated schedule of sites. Further heritage evidence is also necessary to substantiate policies TC 1 – 3. Overall, as the Plan stands there is insufficient evidence to confirm that it will not - and concern that it will - cause harm to designated heritage assets. Unfortunately we therefore do not consider that it can demonstrate conformity with national and local planning policy.</p>	
Devon & Cornwall Police	No response	

Statutory Organisation	Comment Received	Reference Look-Up
Network Rail	<p>Network Rail is a statutory undertaker responsible for maintaining and operating the country’s railway infrastructure and associated estate. Network Rail owns, operates, maintains and develops the main rail network. This includes the railway tracks, stations, signalling systems, bridges, tunnels, level crossings and viaducts. The preparation of development plan policy is important in relation to the protection and enhancement of Network Rail’s infrastructure</p> <p>Within the “Transport and Connectivity” policy justification section about a platform extension at Falmouth Town to allow for 3 carriage trains to call at the station and a longer term aspiration to increase the train service from 2 trains per hour to 3 trains per hour throughout the day.</p> <p>The train lengthening option is in line with what has been suggested in the Western Route Study. Within the Western Route Study (link attached below) there is a ‘choice for funders’ that looks at an addition service in the peak creating a peak service level of 3 trains per hour.</p> <p>The increase in housing and student population will see an increase in train users, which may help the feasibility of a 3<sup>rd</sup> party funding longer trains or funding a longer platform at Falmouth Town.</p> <p>The Western Route Study was published in August 2015. A copy of the Route Study can be found through the following link:</p> <p><a href="https://www.networkrail.co.uk/wp-content/uploads/2016/11/Western-Route-Study-Final-1.pdf">https://www.networkrail.co.uk/wp-content/uploads/2016/11/Western-Route-Study-Final-1.pdf</a></p> <p>Network Rail would draw the council’s attention to the following (which applies to England only):  <b>The Town and Country Planning (Development Management Procedure) (England) Order 2015</b>  <b>Publicity for applications for planning permission within 10 metres of relevant railway land</b>  <b>16.</b>—(1) This article applies where the development to which the application relates is situated within 10 metres of relevant railway land.  (2) The local planning authority must, except where paragraph (3) applies, publicise an application for planning permission by serving requisite notice on any infrastructure manager of relevant railway land.  (3) Where an infrastructure manager has instructed the local planning authority in writing that they do not require notification in relation to a particular description of development, type of building operation or in relation to</p>	

Statutory Organisation	Comment Received	Reference Look-Up
	<p>specified sites or geographical areas (“the instruction”), the local planning authority is not required to notify that infrastructure manager.</p> <p>(4) The infrastructure manager may withdraw the instruction at any time by notifying the local planning authority in writing.</p> <p>(5) In paragraph (2) “requisite notice” means a notice in the appropriate form as set out in Schedule 3 or in a form substantially to the same effect.</p> <p><u>Level Crossings</u></p> <p>Councils are urged to take the view that level crossings can be impacted in a variety of ways by planning proposals:</p> <ul style="list-style-type: none"> <li>• By a proposal being directly next to a level crossing</li> <li>• By the cumulative effect of development added over time</li> <li>• By the type of crossing involved</li> <li>• By the construction of large developments (commercial and residential) where road access to and from site includes a level crossing</li> <li>• By developments that might impede pedestrians ability to hear approaching trains</li> <li>• By proposals that may interfere with pedestrian and vehicle users’ ability to see level crossing warning signs</li> <li>• By any developments for schools, colleges or nurseries where minors in numbers may be using a level crossing.</li> </ul> <p>The Council have a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the rail volume or a material change in the character of traffic using a level crossing over a railway:-</p> <p>■ <i>(Schedule 5 (f)(ii) of the Town &amp; Country Planning (Development Management Procedure) order, 2010) to requires that ... where a proposed development is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over the railway (public footpath, public or private road) the Planning Authority’s Highway Engineer must submit details to both Her Majesty’s Railway Inspectorate and Network Rail for separate approval”.</i></p> <p><u>Planning Applications</u></p>	

Statutory Organisation	Comment Received	Reference Look-Up
	We would appreciate the Council providing Network Rail with an opportunity to comment on any future planning applications should they be submitted for sites adjoining the railway, or within close proximity to the railway as we may have more specific comments to make (further to those above).	
Highways Agency	No Response	
Marine Management Organisation	No Response	
Three (Mobile)	No Response	
O2 and Vodafone (Mobile)	No Response	
EE Mobile	No Response	
OFCOM	No Response	
Royal Cornwall Hospital Trust	No Response	
Peninsula Community Health	No Response	
Kernow Clinical Commissioning Group	No Response	
Healthwatch Cornwall	No Response	
National Grid	No Response	
Western Power Distribution	No Response	
EDF Energy	No Response	
Wales and West Utilities	No Response	
British Gas	No Response	
South West Water	Our primary interest is in ensuring that adequate infrastructure is in place to support new developments proposed within Falmouth and therefore before supporting any planning applications submitted for such we will if considered	

<b>Statutory Organisation</b>	<b>Comment Received</b>	<b>Reference Look-Up</b>
	necessary require improvements to be undertaken where appropriate necessary these to be secured through planning conditions we would request Cornwall Council to impose.	
Budock Parish Council	No Response	
Penryn Town Council	No Response	

#### **Appendix B.**

#### **Pre-submission consultation (Regulation 14) Consultee Comments and Reference Look-Up: Local Organisations**

The table sets out the local organisations that were consulted during the Pre-Submission consultation stage of the Neighbourhood Plan process, and their responses.

<b>Local Organisation</b>	<b>Comment Received</b>	<b>Reference Look-Up</b>
National Maritime Museum Cornwall	<p>These comments are formal submissions on behalf of the National Maritime Museum Cornwall.</p> <p>Page 41, Policy BE 4: Enhancing and promoting the Moor. We believe that the enhancement of the Moor will be a great asset to Falmouth's cultural programme. However, we also believe that the area around NMMC and Events Square is one of Falmouth's key assets and the activity carried out at this end of town is underrepresented in the Neighbourhood Plan in its current version. Greater focus should be given to the possibility for complementary and joined-up programming to take place at both ends of the town, encouraging visitors and residents to travel through the town and re-enforcing their sense of place.</p> <p>Page 41, Policy BE 6: Supporting Festivals Infrastructure. NMMC has ambitions to introduce new cultural programming on Events Square in addition to the existing, very successful, festivals that take place throughout the year. We would like to request this ambition is included in the neighbourhood plan.</p> <p>Page 52, Policy CUL 1 and Policy CUL 2: Development of new and regeneration of cultural facilities and Cultural</p>	<b>B1</b>



Local Organisation	Comment Received	Reference Look-Up
	<p>expertise in new development. NMMC is planning a major redevelopment project to reinvigorate and transform the experience of our visitors, strengthen our offer to the community, secure our long-term future, and better tell the story of Falmouth’s maritime heritage. Cllr Candy Atherton has received an initial briefing on our plans. We would like to request these plans are referenced in the Neighbourhood Plan, as they will contribute to securing Falmouth’s position as a distinctive and vibrant coastal community.</p> <p>Page 52, Policy CUL 5: Funding. Could it be clarified that both local authority and independent organisations will be able to apply for CIL and 106 monies?</p> <p>As an overarching comment, we feel that the importance of tourism to the town is not explored in sufficient detail in the Neighbourhood Plan. The one million day visitors Falmouth receives each year have a huge impact on the economy and continued resilience of the town, and we believe this should be referenced and highlighted.</p> <p>We would also like there to be greater recognition of the role that the cultural offer in Falmouth plays in attracting these tourists, along with the natural beauty, the beaches, and the harbour. NMMC is the largest museum in Cornwall and the only one able to bring treasures from national and international institutions to the region; our exhibitions in particular bring thousands of visitors to Falmouth. Working in partnership with the local authority institutions and other independent organisations, we help to bring real vibrancy to the life of those who visit and live in Falmouth.</p> <p>We would also like to make a formal request to become members of the Neighbourhood Plan Stakeholder Group and Working Group.</p>	
A&P Group	<p>Overall, we support the vision contained within the plan which promotes Falmouth as an important strategic role in enabling Cornwall’s economy to reach its full potential. However, as it is currently worded, the plan does not safeguard or highlight the importance of the dock related activities which is fundamental, to not only the Neighbourhood Plan vision succeeding, but also the visions at a more micro and macro level, as defined within the following:</p> <ul style="list-style-type: none"> <li>• Falmouth Harbour Masterplan (2011);</li> <li>• Cornwall Local Plan (2016);</li> <li>• Emerging Site Allocations DPD (2016) and</li> </ul>	<b>B2</b>

Local Organisation	Comment Received	Reference Look-Up
	<ul style="list-style-type: none"> <li>National Policy Statement (NPS) for Ports (2012).</li> </ul> <p>We expand on the various concerns below, but in the first instance seek to clarify the extent and nature of operations at Falmouth Docks, to give these representations due context.</p> <p><b>Background</b></p> <p>Falmouth Docks has a proud history in defence, ship repair and heavy engineering and offers a number of services by a range of operators, including A&amp;P Group, Falmouth Petroleum Ltd, Pendennis Shipyard and South West Water. 24 hour operations undertaken at the Dock include ship repair, cargo handling, oil bunkering facilities and the treatment of sewage.</p> <p>The Port of Falmouth is the largest ship-repair complex in the UK with three large graving docks and extensive deepwater berthing providing capacity for vessels up to 100,000 tonnes. The Port boasts one of the world's largest natural deep-water harbours which can accommodate large vessels in a strategically important location relative to the SW approaches.</p> <p>A&amp;P offer onsite engineering, electrical, paint and fabrication workshops and links to all other specialist contractors and OEMs, these are integrated to provide a complete range of marine repair services. As well as extensive workshop facilities across all disciplines, Falmouth Docks offers bunkering facilities operated by Falmouth Oils Services Ltd.</p> <p>Falmouth is a busy working port handling over 100,000 tonnes of product annually and there has been ship repair activity on the site for 155 years. To date there are over 30 businesses located in the Docks providing a full range of services including towage, ship's agency, area port health, diving services, local surveyors and tank washing. The Port provides significant further employment to the local towns and the hinterland through direct sub-contractor businesses and other service providers such as accommodation and food suppliers. This cluster effect is typical of port operations and has wide reaching economic benefits as described in the NPS for Ports.</p> <p>A&amp;P has many long-term ship repair partners, including P&amp;O, Grimaldi, Condor, Gardline, Euroships, Stena UK and the Ministry of Defence. These partnering agreements, some of which have been in place for up to 15 years, demonstrate A&amp;P's long term commitment to creating a successful working port.</p>	

Local Organisation	Comment Received	Reference Look-Up
	<p>Falmouth Docks is a major employer in the region. A&amp;P alone employ 255 permanent staff, including 8 apprentices, at this location together with a significant number of agency workers and subcontractors from the local area to cater for peaks and troughs in workload. Falmouth Docks is also the entry point for tourists and is used by 16,000+ cruise passengers annually who see Falmouth as the gateway to Cornwall.</p> <p>Taking account of the extent and nature of work at Falmouth Docks, the representations on each relevant chapter of the plan, seeks to safeguard dock operations from conflicting development in close proximity, whilst promoting plans for future maritime growth.</p> <p><b>Chapter 4 – Our Vision for Falmouth</b></p> <p>We are encouraged by the vision and aims of the plan which has sustainable development as its heart. However, to achieve a sustainable economy, not only will the plan need to promote marine industries, but it will need to, first and foremost, protect its existing dock operations. As such an extra objective should be included in the blue box on page 15 which seeks to ‘maintain and develop existing port operations and related businesses’.</p> <p>We support the recognition that page 15 gives to dredging of the harbour but there are other maritime industries that need citing within this section that make a valuable contribution to the Docks and the wider economy. These include: shiprepair, cargo handling, cruise sector, superyacht building and refit, bunkering services, sewage, recreational boating as well a wide variety of smaller businesses. These not only support the marine industry directly, but also support the wider Cornish economy in sectors such as agriculture (by cost effective import of animal foodstuff and fertilisers) and tourism (by increasing visitor numbers arriving on cruise ships). Full details of the economic sectors represented at the Port is contained within the Falmouth Harbour Masterplan (2011), a key report which the Draft Neighbourhood Plan fails to reference within its main body. The aim of this Masterplan is to develop a successful and viable operational port at Falmouth, to which the activities and growth at Falmouth Docks is key to achieving the overall strategic aim. The Masterplan has had the support of key stakeholders throughout its preparation. It sets out that momentum gained through the preparation process is continued into the future to ensure that the Masterplan vision is delivered and turned into reality. This Masterplan document is a material planning consideration in the production of the Draft Neighbourhood Plan.</p>	

Local Organisation	Comment Received	Reference Look-Up
	<p>Furthermore, reference should be made to the new enterprise zone which marks Cornwall as a world leader in developing marine renewable energy. The Wave Hub, the world's largest wave energy testing facility, will be transferred to Cornwall Council to develop the facility as part of a low carbon MarineHub Enterprise Zone. The allocation of an Enterprise Zone in this location further highlights the national importance of the Dock to creating a sustainable economy and this notion should be carried forward in the Neighbourhood Plan.</p> <p><b>Chapter 5 – Housing and Regeneration</b></p> <p>Urban capacity/infill housing and regeneration</p> <p>On page 25 there is a list of sites, taken from the Strategy and Housing Report (2016) which have the potential for various forms of development within the plan period. Two of these are within close proximity to the Docks and include:</p> <ul style="list-style-type: none"> <li>• C.31 Melville Road Sidings for new build apartments or hotel; and</li> <li>• C.34 Ocean Bowl for new build housing or student accommodation.</li> </ul> <p>A&amp;P strongly object to the Neighbourhood Plan referencing these sites outside of the Strategy and Housing Report due to the impact on Falmouth Docks and future growth aspirations. Instead, A&amp;P is of the firm view that these two sites should be moved from Section C (enabling development, residential infill) of the Strategy and Housing Report entirely, and instead should be safeguarded for marine-related employment.</p> <p>The previous use of C.31 and C.34 and current neighbouring industrial and maritime uses are overriding factors outweighing any other form of development on the site, and therefore both of these areas should be protected for employment development. Similarly, the Strategy and Housing Report should reallocate site D.36 (Old Oil Depot, Pendennis Headland), currently protected from development, to employment related development, in accordance with its existing land use. Indeed, this is the approach taken by the emerging Site Allocations DPD which safeguards D.36 as part of the wider Dock area for employment development.</p> <p>Of, particular note, A&amp;P has previously objected to the allocation of C.34 Ocean Bowl in the emerging Cornwall Site Allocations Development Plan Document (2016). These concerns and strong objections carry forward and also apply to C.31 Melville Road Sidings. For ease, we summarise the concerns below.</p>	

Local Organisation	Comment Received	Reference Look-Up
	<p>Policy HR 6 of the Neighbourhood Plan suggests these two sites, amongst others, could potentially come forward if there is a housing shortfall. However, there are additional sensitivities borne by their location in close proximity to the Docks. Consideration must be given to the impact this will have on both the Port of Falmouth and future occupiers of the proposed development if pursued and completed. The impact on Falmouth Dock relates to the existing operations as well as the Dock's future growth aspirations.</p> <p>Falmouth Docks is fully operational 24 hours a day, with shifts continuing throughout the night, depending on work pressures. The activities undertaken on site are typical of that for a working dock and often result in noisy activity. Despite efforts to minimise noise emission, the level of noise breakout cannot be fully controlled. Paragraph 123 of the National Planning (NPPF) sets out that:  <i>"Existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established."</i></p> <p>A&amp;P are seriously concerned that reference to these sites in the Neighbourhood Plan will give weight to wholly unsustainable development coming forward in such close proximity to the Port. This will ultimately give rise to complaints from future occupiers, resulting in unreasonable restrictions placed on the operations carried out at Falmouth Docks. This in turn could impact on productivity in undertaking day-to-day operations at the Docks.</p> <p>These two sites lie on the periphery of the Falmouth Harbour Masterplan area but is affected by the Masterplan proposals, including proximity to the railway line. A&amp;P are committed to maximising operations and opportunities for growth at Falmouth Docks and benefit from extensive permitted development rights to allow redevelopment of this area for port related activities.</p> <p>It is anticipated that as part of delivering the Masterplan, a rail link into the Docks will be established for freight to help boost productivity of the Port. This is in response to a specific opportunity from Cornwall's largest inland quarry, with permission to export, Colas Cornwall Quarries (albeit it is worth noting that rail freight will also open links with other quarries in the area). This operation will involve creating a stock pile of aggregates in the vicinity of the rail head on port land and then loading it by mechanical means to freight wagons on the railway siding. Pursuing rail freight in this suitable location is entirely in accordance with Cornwall Local Plan Policy 17: Minerals – general principles, which states:  <i>"Support will be given to maintain and grow a world class, thriving and sustainable minerals industry in Cornwall which meets local needs as well as exporting minerals, predominantly by rail and sea, to serve regional, national and</i></p>	

Local Organisation	Comment Received	Reference Look-Up
	<p>international markets". In progressing the above project, A&amp;P has very recently applied for European funding to undertake enabling works to deliver a low-carbon multimodal transport terminal at Falmouth Docks to transport freight by rail out of Cornwall.</p> <p>With respect to the extent of the existing rail line through Falmouth, it is well buffered with established trees. However, on approach to sites C.31 and C.34 and Falmouth Docks Station, this buffer falls away. If permitted, these sites will likely impact on the potential to use this rail line for freight in the future, due to noise concerns, vibrations and hours of operations (freight is expected to move throughout the night as it is a passenger line in the day). This concern is extended to the loading and unloading of freight trains once stationary at the Docks. Any residential development on C.31 and C.34 will adversely effect the future ability of the port to respond to aggregate and energy cargos by rail, going against the principles of Policy 17 and 18 of the Cornwall Local Plan.</p> <p>The rail freight project in these locations will not only, improve accessibility and connectivity within and through the Dock, but it will also provide strategic connections for Cornwall through developing a sustainable means of rail transport in accordance with Policy 17 of the Cornwall Local Plan.</p> <p>This is a key strategic transport infrastructure investment for the Port of Falmouth and will improve the railway network with current employment sites at the Port of Falmouth. It is a critical piece of infrastructure that will improve conectivity, accessibility and manage congestion, helping the Docks and Cornwall to realise its full potential.</p> <p>In addition, A&amp;P are taking further steps to develop Falmouth Docks in accordance with the Masterplan and more recently have secured planning permission for a Low Flash Oil Slop facility to be located alongside the Eastern Jetty. The facility is the first of its kind in the UK and will offer a required service to ships seeking to dispose of slop oil. Currently ships and vessels divert to Lisbon or pay to enter the Port of Rotterdam to utilise oil slop facility services, drawing trade away from Falmouth Docks.</p> <p>A significant opportunity for the Port, as identified in the Masterplan, is the potential growth in cruise calls to the port. Day call cruise operations require large areas for the marshalling of coaches and there is little existing space in the docks for this. Growth in this sector will combine income generation for the Port and its various services as well as provide tangible tourism related benefits to Falmouth and the region.</p>	

Local Organisation	Comment Received	Reference Look-Up
	<p>Turn around cruise calls also require car parking facilities for up to 600 cars. Instead of apartment, hotel or housing development, these sites could be beneficial for cruise related car parking or coach marshalling, with the possibility of a connecting raised concourse to a cruise terminal building in the port.</p> <p>It is for the above reasons, that A&amp;P <b>object to Policy HR 6</b> insofar as it includes C.31 and C.34. These sites should be removed from the list on page 25 of the Neighbourhood Plan, as they are unsuitable and unsustainable sites for housing, apartments or a hotel and will impact on the Port operations and future growth aspirations, key to Falmouth’s economy. Instead these sites and site D.36 should be protected from any form of housing development and safeguarded for future employment development in accordance with existing and neighbouring land use. Should the Stakeholder Group and the Town Council consider otherwise and seek to retain C.31 and C.34 within the remit of Policy HR 6, then additional mitigation measures should be in place beyond <b>Policy HR 7</b> which only assesses development against design criteria.</p> <p><b>Accommodating students</b>  Cornwall Council has not completed a student needs assessment. In the absence of this, planning applications for student accommodation should include a student needs assessment to justify the need for development. As such, <b>Policy HMO2 and Policy HMO3</b> relating to houses in multiple occupation and student accommodation should include additional criteria for development coming forward in close proximity to the Dock area to:</p> <ul style="list-style-type: none"> <li>• Include a student needs assessment to justify the principle and the need for student accommodation; and</li> <li>• Demonstrate that it has properly considered the relationship with the uses ongoing at the neighbouring docks site, giving particular regard to the potential hazards associated with industrial operations within the docks, and that any mitigation or safeguarding measures are incorporated into the proposed development.</li> </ul> <p><b>Chapter 7 – Business and Employment</b>  We are wholly supportive of the key objectives, context, policy justification and intention within this chapter and it is great to see the recognition given by the community and the Neighbourhood Plan to the importance and potential of Falmouth Docks as a key business and employment asset to the town.</p> <p>With regards to the wording however, we do feel that more emphasis should be given to Falmouth’s port and dock operation, and reference should be made of the Port of Falmouth Masterplan as a key evidence base underpinning</p>	

Local Organisation	Comment Received	Reference Look-Up
	<p>this chapter, as well as the new Marine Enterprise Zone. By virtue of the Masterplan the 'Policy Intention' section of this chapter should make reference to the operations listed under Chapter 4 above.</p> <p>This should translate through to the wording of <b>Policy BE 1</b>: Supporting the Harbour, Port and Docks to state:          "This Neighbourhood Plan supports the principle of the dredging of Falmouth Harbour to provide an improved approach into the Docks to enhance access for large vessels. Development which maximises the economic value of the dredge to marine engineering and maritime tourism will be supported subject to the environmental and design policies given elsewhere in this Neighbourhood Plan.</p> <p>The expansion and intensification of other marine related uses on the docks represents a key opportunity, which will support existing operators, as well as help attract new business to the town".</p> <p><b>Conclusion</b></p> <p>It is encouraging that the draft plan is not anti-development and is generally supportive of development. However, these uses do not necessarily complement each other and it is key that the growth of one does not stifle or impact negatively on the other. In this regard, policy wording in the plan should not be to the detriment of existing and future port operations and additional policies and criteria should be included, as highlighted above, to safeguard Falmouth Docks and not undermine its growth. This will ensure alignment at both a local and national level as required by the Local Plan and the NPS for Ports. The approach and suggestions in this representation lies at the heart of securing the long-term future of the Dock and the full range of economic, environmental and social benefits that will accrue locally, regionally and nationally as result.</p> <p>As such, we trust that the Stakeholder Group and Town Council will continue to support the future aspirations for this area of the port to improve its prosperity and increase employment opportunities, and it is respectfully requested that these representations are taken into account as the Neighbourhood Plan progresses.</p>	
Transition Falmouth	I am concerned that the 'longterm' objective with the 2030 focus has been neglected. The plan appears lacking in detail and practical objectives regarding the effects of Climate Change and the challenges of Global Energy and Food Security. Falmouth and area is in a vulnerable position regarding consistent energy supply (end of grid) and food distribution.	<b>B3</b>



Local Organisation	Comment Received	Reference Look-Up
	<p><b>Fal Energy Partnership</b> has produced a plan for resilient energy production from renewables within the Network area and an outline plan for local food production. Cornwall Council is working towards an ‘energy safe’ County/Duchy which needs an energy conscious Falmouth to be partnering.</p> <p>A dynamic Falmouth can then look to new job opportunities to add to the IT and others outlined in the draft plan. Local Energy, Resource and Waste management and Food Production are pivotal for a healthy and resilient local economy and although Central Government appears currently not very supportive of local solutions, other foresighted Cities and Towns are implementing integrated local plans.</p> <p>As part of the Community Plan of 2008/9 a report was produced for Future Fitting Falmouth, which I am attaching. It outlines a healthy, vibrant, resilient, local area achieved within the context of the increasing pressure of global economic and climatic instability. <b>Transition Falmouth</b> was very involved in formulating this report.</p> <p>Housing: Housing options could include Co-housing projects to suit life and lifestyle changes.</p> <p>Environment: Green areas to include edible pathways and community orchards (already explored at Draceana).</p> <p>Transport: to reduce pollution, and road congestion: an integrated delivery hub on the periphery of town, for large vehicles to small local delivery vehicles.</p>	
Falmouth & Penryn Liberal Democrats	<p>As Chair of the Falmouth and Penryn Branch of the Liberal Democrats I formally respond on behalf of the Branch to the draft Falmouth Neighbourhood Plan (FNP). We believe that the agreement of a Neighbourhood Plan is required as a matter of urgency, to enable choices and decisions to be made by the Town Council and Cornwall Council which reflect the wishes of the Falmouth community as far as is possible within the constraints that are imposed by the frameworks and directions of central government. Until the Plan is in place, the Councils and the community have one hand tied behind their backs in dealing with developers.</p> <p>We support the draft FNP in principle. It has been professionally prepared and supports a vision of Falmouth as a forward thinking, vibrant town, promoting and preserving our maritime and artistic heritage. We thank the various community organisations which have given their time, expertise and input to the FNP thus far.</p>	<b>B4</b>

Local Organisation	Comment Received	Reference Look-Up
	<p>We present the following comments, suggestions and proposed amendments to assist in further improving what is a generally excellent draft.</p> <p><b>Housing and Regeneration</b></p> <p>The existing draft lays down a broad overall strategy which concentrates the achievement of housing expansion targets in new sustainable communities at the edge of the existing built up areas, and recognises also that a secondary contribution can be made by redevelopment opportunities. With the constraints of geography, this is realistic.</p> <p>Local Plan site allocations are being revisited in discussion currently under way within Cornwall Council. The Neighbourhood Plan needs to be consistent with these revisions: the Falmouth input to this discussion is crucial. The potential uses for urban capacity and regeneration sites, the policy intention for the town centre, and the possible redevelopment of the former Territorial Army site need to be harmonised within the Plan. In considering the potential of town centre sites for housing of any kind, the implications for traffic flow along the main street are critical: any additional vehicle flow will work directly counter to the Plan objective of improving the town centre environment. This is specifically relevant to any proposed development at Fish Strand Hill.</p> <p><b>Houses in Multiple Occupation: Article 4 Direction</b></p> <p>The introduction of the Article 4 Direction alongside the preparation of the Neighbourhood Plan is essential and welcome. However, the maps within the draft plan indicate that in addition to the areas north and east of Dracaena Avenue where ‘HMO hotspots’ are located, a further concentration of hotspots exists in the area of Penmere Hill, Kings Avenue and Tregenver Road.</p> <p>Proposal: The zone in which no further HMO conversions zone would be allowed, east of the A39 and included in policy HMO1 under the Article 4 Direction should be extended to include an area surrounding of Penmere Hill, Kings Avenue and Tregenver Road.</p> <p><b>New Purpose Built Student Accommodation</b></p>	

Local Organisation	Comment Received	Reference Look-Up
	<p>It is important to assess the merits of each individual application for new purpose built student accommodation in Falmouth. Not all sites close to the town centre are necessarily suitable, even subject to conditions; and not all potentially suitable sites are close to the town centre.</p> <p>Proposal: Policy HMO3 be amended to remove 'close to the Town centre and' from paragraph 1a, and replace it by 'that do not impinge on existing residential areas'.</p> <p>In this context, the use of the Penwerris Lane site, the Ocean Bowl site, the Rosslyn Hotel site or the Four Winds site for PBSA does not appear appropriate.</p> <p>This permission will take away the democratic process of Falmouth Town Council and Cornwall Council planning committees to be able to determine each application on individual merit. Whereas if this specific permission remains it will tie the hands of planning officers and committees to not oppose developments of this type in areas that are unsuitable but are situated close to the Town centre.</p> <p><b>Church Street</b></p> <p>The emphasis on the regeneration of Falmouth town centre is a strong positive feature of the plan. It is important that development, in particular at the Church Street car park, is as attractive as possible to residents all year round, and not only to summer visitors. It is thus critical that fears be allayed that changes in parking arrangements mean that local people will no longer have easy access to the town centre. At least until alternative parking arrangements are in place, it would be desirable for the regeneration of the waterfront to be phased to retain an area of public car parking to be retained in the Church Street car park additional to the needs of the disabled, businesses and town centre residents.</p> <p>The intention within the draft Plan to increase parking facilities at the Quarry car park and create parking at the former Territorial Army site as an integral part of any development is highly welcome. Accompanying enhancement of the shuttle bus service to ensure easy access to the shops from these locations is likely to be a vital contribution to making such an approach successful. Consideration could also be given to identifying whether the New Street car park might also provide scope for deck or multi-storey parking as suggested on the Quarry and TA sites.</p>	

Local Organisation	Comment Received	Reference Look-Up
	<p><b>Dracaena Skatepark</b></p> <p>The proposed Policy BE5, which envisages a new high quality skatepark at Dracaena Fields, is an especially welcome initiative which is warmly endorsed.</p> <p><b>Falmouth Community Hospital</b></p> <p>At the recent NHS Sustainability and Transformation Plan presentation, the NHS representatives would not state at this time what the future for Falmouth Hospital would be. The proposal in Policy HA1 of the draft plan to support proposals for the regeneration of the Falmouth Community Hospital and Health Centre to retain and extend their health and social use is thus of vital importance. However, the proposed Policy HA1 makes no clear mention of the existing Boscawen Ward and Minor Injuries Unit, which provide a valued contribution to the health service for Falmouth, Penryn and the wider local community – especially in the context of the frequent and often severe overloading of the A&amp;E unit at Treliske.</p> <p>Proposal: Policy HA1 be strengthened to further affirm support for preservation of the existing services and health care provided at the Falmouth Community Hospital site, including the retention and enhancement of Boscawen Ward and the Minor Injuries Unit.</p> <p>Proposal: The zone in which no further HMO conversions zone would be allowed, east of the A39 and included in policy HMO1 under the Article 4 Direction should be extended to include an area surrounding of Penmere Hill, Kings Avenue and Tregenver Road.</p> <p>Proposal: Policy HMO3 be amended to remove 'close to the Town centre and' from paragraph 1a, and replace it by 'that do not impinge on existing residential areas'.</p> <p>Proposal: Policy HA1 be strengthened to further affirm support for preservation of the existing services and health care provided at the Falmouth Community Hospital site, including the retention and enhancement of Boscawen Ward and the Minor Injuries Unit.</p>	

Local Organisation	Comment Received	Reference Look-Up
Falmouth Afoot	<p>Falmouth Afoot, the organisation submitting these comments, aims at making Falmouth town centre safer and more welcoming for pedestrians. We support the Neighbourhood Plan's objective of enhancing the centre to create an 'attractive destination' for shoppers, visitors and tourists. Being 'attractive' to pedestrians includes providing an environment that is safe, accessible and easy to use for those on foot and users of wheelchairs and pushchairs. The plan's key objective of providing a 'pedestrian friendly and accessible environment' is crucial to developing a positive future for the town centre and we hope that it receives whole-hearted support from the local business community and the town and county councils. It is encouraging that the public consultation showed a high degree of support for 'easy pedestrian access'.</p> <p>The associated 'town centre strategy' (page 35) includes the enforcement of Traffic Regulation Orders, which have been in operation for many years but have been intermittently and often weakly enforced. The current TROs already enable a form of 'time-limited pedestrianisation' (proposed on page 35), as between 11.0am and 4.0pm every day vehicles are permitted to drive in the pedestrian zone only for the purpose of off-street parking, mainly in Church Street Car Park. A few specified vehicles are excepted from that restriction but otherwise driving through the zone for any other reason is prohibited at those times. If the relevant TROs were enforced with greater commitment and consistency, the benefit to pedestrians and the environment would be significantly strengthened.</p> <p>The bodies responsible for enforcement (Cornwall Council for parking and loading/unloading contraventions, and the local police for driving offences) point to inadequate resources to explain the low levels of enforcement. The police in particular devote virtually no time to enforcing the relevant TRO.</p> <p>Even if the Plan's objective of reducing the parking available in Church Street Car Park is achieved, vehicles will still be permitted in the pedestrian zone for parking in its car parks or loading and unloading. Enforcement of the TROs, therefore, will continue to be essential, if the objectives of providing a 'pedestrian friendly and accessible environment' and 'easy pedestrian access' and 'time-limited pedestrianisation' are to be realised. Falmouth Afoot has proposed the installation of an Automatic Number Plate Recognition (ANPR) system as a means of enforcing the TROs by penalising drivers that disregard the restrictions. Such a system would be relatively inexpensive to install and operate, and is widely used throughout the UK. We very much hope that the authorities will consider this option carefully, as well as other practical means of enforcing the TROs that both Cornwall Council and the police have approved for the purpose of improving the environment in Falmouth's town centre. Until enforcement is taken seriously and is implemented effectively, the desired objectives related to pedestrians will not occur.</p>	B5

Local Organisation	Comment Received	Reference Look-Up
	As the enforcement of the Traffic Regulation Orders is part of the town centre strategy, it would be helpful if the Plan included practical ideas as to how such enforcement could be accomplished.	
Save our Falmouth	<p><b>Economy</b></p> <ul style="list-style-type: none"> <li>* Policy to safeguard Tourist Industry.</li> <li>* More emphasis on All Industries not just Uni. Marine contributes £500 million, Tourist £1.8 billion.</li> <li>* Encourage a variety of shops.</li> </ul> <p><b>Housing</b></p> <ul style="list-style-type: none"> <li>* Promote Local affordable housing.</li> <li>* Omit sites not on revised DPD document.</li> <li>* PBSA closer to Campus.</li> </ul> <p><b>Community</b></p> <ul style="list-style-type: none"> <li>* No enabling development on Rugby club, Adult education centre or any other community facility.</li> <li>* Safe guard Falmouth Hospital and Health care Facilities as largest town in Cornwall.</li> </ul> <p><b>Transport</b></p> <ul style="list-style-type: none"> <li>* Massive upgrade of all modes of transport.</li> </ul> <p>I fully support all the comments made in this letter including the Article 4 Direction.</p>	<b>B6</b>
Cornwall Residential Landlords Association	<b>No response</b>	
National Landlords Association	<b>No Response</b>	

## Appendix C

### Pre-submission consultation (Regulation 14) Consultee Comments and Reference Look-Up: Individuals

The table below sets out the individual comments receive from members of the community during the Pre-Submission consultation.

Comment Received	LNDP Meets expectations	Reference Look-Up
I support your effort to control thoughtless, inappropriate and inconsiderate change to the local environment and quality of life. I would like to see a requirement built in to the Plan that would make it compulsory to fully inform a locale or small group of residents as to any developments or change, however minor, that will affect their day to day existence. Planning permissions etc. are already required to be locally advertised (i.e. signs in streets) but the installation of yellow line parking restrictions, the creation of a disabled parking space, to name but two, are changes that can be made without due consultation	Yes	C1.

Comment Received	LNDP Meets expectations	Reference Look-Up
<p>with the residents of a street. It would be helpful if this kind of change were discussed with the residents that it would directly impact. Informed and discussed at street level it may, at first glance, appear to be a labour intensive process but will surely present a saving in the long run and help to ensure a more contented neighbourhood.</p>		
<p>Support housing expansion for local residents but not for property developers or landlords to purchase. Councils to build properties for help to buy, but when wanting to move up the property ladder sell the property back to the council at market value.</p> <p>Policy HMO. Support Article 4. Need to protect visitor accommodation to not allow B&amp;B to HMO's</p> <p>Policy Town Centre. Disagree with loss of car parking at Church Street for town shoppers. Need to develop in town car park. Quarry Car park needs to increase parking capacity with multi level. Any accommodation included should be for Social Housing</p> <p>Policy BE1 Support Harbour Port &amp; Docks. Need to push harbour dredging with more vigour. Cornwall will also benefit.</p> <p>Policy FOS3. Support improvement to Pendennis. Must retain free parking on the point. Visitor experience needs to be improved with clearing overgrown vegetation. When encouraging people to go to Castle Drive and the Point the outlook from all of the bench seating on the east side of the point is completely obscured by trees. At least trim the vegetation in front of the benches to access the views of the water and boating activity.</p> <p>Improve the coastal path between Gyllingvase beach and Swanpool beach with a permanent pathway suitable to allow use by wheelchair users and pushchairs. This would enable the creation of a circular walk around the perimeter of Falmouth from the Town Centre across the seafront and back via Killigrew Street.</p> <p>Policy TCON1, Increase and improve circular bus route the town centre to seafront.</p> <p>Policy DG3 Many new developments, particularly along the seafront, are out of the general character of the existing buildings.</p>	<p><b>Yes</b></p>	<p><b>C2.</b></p>



Comment Received	LNDP Meets expectations	Reference Look-Up
<p>Some of the proposed developments are more akin to Costa Brava than the historic working Port of Falmouth. Design should be more compatible with its surrounding area.</p>		
<p>Objection to HMOs - community balance considerations  We have 1 in our short street. The residents don't always put rubbish out for collection. They leave the 3 outside lights on frequently, sometimes all night. The previous students left curtains drawn all the time, Now they are left open or half open with the light on until late evening. Each of the 4 residents has a car, one of which is often parked across the single yellow line and up on the pavement. Friends visit, each in their own car. Yes, I feared that the HMO issue would spread to my area and it has.</p> <p>I heard mention that Cornwall Council is considering a total ban on HMOs in the Neighbourhood Plan area. The huge advantages and obvious limitations of having sea on 2 sides of Falmouth need to be properly addressed to maintain our community. Well done to all the contributors to the Plan.</p> <p>For planning applications, please can we not be misled by artist's impressions, eg the flexible space at the Woodlane Campus, as printed in CommUnity Autumn 2016. It looks tasteful and low-key, unlike the resulting 'polytunnel'. I have been told that a new application was made for the different roof. Was anyone notified?  An intention to avoid building eyesores.</p> <p>Council tax  Further to my previous comments on HMOs, I would like to protest about Falmouth residents subsidising local services for landlords of student-only houses. Why are these private landlords getting richer at our expense, when council money is so tight? Perhaps this should be raised as a national issue if it can't be done at a local level. Sarah Newton? If possible, changes to council tax exemptions for student-only houses  Second (/+++ ) homes</p> <p>In recent years, two large properties at the bottom of Woodlane/start of Swanpool Street have been bought by people who</p>	<p>yes</p>	<p>C3.</p>

Comment Received	LNDP Meets expectations	Reference Look-Up
<p>don't live in them. I refer to that corner as 'dead corner'. It's sad to see no lights or signs of life most of the time. This is not contributing to the vibrant, living community we have in Falmouth. Is there any plan to control house ownership which is not lived in or rented out? I remember many years ago that Wales had the same problem and it was sucking the life out of small communities. With globalisation, our desirable properties may be snapped up by richer overseas buyers. What about the local Cornish people? Provision for minimising the number of empty houses in the Neighbourhood Plan area.</p> <p><b>Waste Collection</b> Please can we have a food waste collection scheme? I know that other parts of Britain have one. As a community (communities) couldn't we have a scheme which digested it and sold it as compost? I think the Eden Project does this.</p> <p><b>Recycling</b> Does our recycling end up in landfill? I'm of the 'rinse and return' generation and I can't see how most of the empties put out by younger people can be recycled. Cartons, bottles, cans mostly unwashed with the tops on (my experience with lodgers and my aunt's carers, in London). I long for more self-sustaining communities who encourage more diligence with looking after our waste. If people are shown why they need to do something perhaps they are more likely to do it.</p>		
<p>Having read the draft Neighbourhood Plan for Falmouth these are my thoughts. Please could they be considered in the review of all comments received on the draft.</p> <p>Overall I feel that the plan is good and a positive step seeking to take the initiative in guiding Falmouth's future.</p> <p>I am, like many residents, concerned about the growth of the Universities and in particular the impact this is having on existing housing and the rush of student accommodation development applications. I would welcome the provision of an Article 4 directive requiring new HMO's to have planning permission. I do however have the following concerns:</p>		<b>C4</b>

Comment Received	LNDP Meets expectations	Reference Look-Up
<p>The decision to make the A39 a boundary between an area where no further HMO's will be permitted, and the rest of town where limited HMO's will be permitted. Me and my family live on Fairfield Road, a residential street currently mainly consisting of families and older retired people. We currently have one student house on the street, which I know provides problems for its neighbours. The prospect of a clamp down on HMO's to the east of the A39 with some permitted on the other side inevitably makes us concerned about a rush to purchase and convert to HMO's any property which comes on the market – effectively shifting the problems to the other side of an arbitrary line. I am concerned it will have the effect of making properties on our street far more desirable to the student letting market with all the widely acknowledged problems this brings. We are only just the wrong side of the line, which would put us in the front line.</p> <p>I must admit I couldn't apply the example of how the guidance would be applied to HMO applications in my area with any confidence, so I don't know for sure how well protected we would be from a growth in student housing on our street. Will an existing non-licensed HMO be considered in the calculation, for example? A better understanding of this policy may put my mind at rest, but for now it makes me anxious for all the reasons many other people are anxious about the spread of student houses. Could I suggest that the 'No further HMO's permitted' line be removed and the policy applied to the whole town, as enough properties have been converted to student HMO's already, and the University should make all remaining provision via dedicated accommodation on suitable sites?</p> <p>Also, I believe there must be a way of determining between shared houses used by students and shared houses used by other members of the community. As the clamp down on HMO's, whilst welcome, has come about because of the abundance of students, other members of our community shouldn't be driven out by a broad brush policy. When I first moved to Falmouth I lived in a shared house, not as a student, and I have now settled here, started a family and I believe become a positively contributing member of the community. If there are no houses available for non-students to move in to as they have all been taken up by students, and no further HMO's permitted, then we may drive these young workers away. Please think about a get out clause to permit houses to become HMO's for non-students.</p> <p>Falmouth desperately needs a decent 25-50m swimming pool. For a town of our size not to have one is unusual. If Ships and Castles is not viable due to its high running costs and eventually folds, then could a clause be included in the plan to guarantee</p>		

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<p>that the site remains a swimming pool site for the community, with a standard pool with lower running costs? The hotel pools are inadequate and for a beach town not to have a swimming pool for our children to learn to swim in is totally unthinkable. Or perhaps the provision of a 25m pool becomes a planning condition for a future development?</p> <p>There appears to be no join up with parking strategy and the recent consultation on street parking, both pay and display and residents parking. I believe both will damage the town irreversibly and would work against many of the policies in the plan. I am concerned that this is a conscious omission as one of the key advocates of the plan is a supporter of residents parking, or perhaps because the parking changes are a forgone conclusion. It should certainly be addressed in the plan.</p> <p>The dog free area at Boscoven Fields is a real asset to the town, particularly as a relaxation of dog controls is coming soon. It must be preserved and reflected in the plan. The recent consultation on dogs completely passed me by, I read about it in the West Briton after the event. I am concerned that it would have been publicised to dogs groups and not the wider public, and therefore be skewed in favour of dogs. Dog ownership seems to be growing exponentially, and the negative impact of dogs, or more specifically some dog owners is being felt by us and many other families. Going onto Gylly beach in the winter with children is difficult without some form of confrontation with an irresponsible dog owner or our children being scared by a dog or dogs. People with dogs often do not respect the wishes of people without dogs, and somehow feel that dogs frightening children and invading other people's space is their problem to get over – their dogs can do no wrong and all should love them as they do. Sanctuary from this is vital, and I would like the plan to reflect this and there to be a policy that the beaches remain off limits to dogs in the summer. I know Castle Beach was considered for summer use recently. If this had gone ahead it would have been effectively off limits to all but dog owners.</p> <p>More details and specifics need to be provided on cycle lanes. For example if there was a safe route from Fairfield Road, to King Charles School and on down to Gyllingvase, we would regularly use it, and it would get us out of our car more . This needs to be considered in further detail, and provision extended beyond simply a line and a different coloured piece of tarmac. A segregated path would be needed to get the use required by the plans vision.</p>		

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<p>p.28 The Site Allocations- DPD document suggested four student sites in Falmouth for the build of PBSAs to accommodate a further 1,550 students within the confines of our small town. These sites have now, quite sensibly been withdrawn from the SA-DPD with consideration of alternative proposals to provide for the growth of the Universities, consequent upon any approvals to raise the cap at Penryn Campus by 2,500 students.</p> <p>The Neighbourhood Plan will now have to be modified extensively to reflect this change in student accommodation provision. However, this is a real opportunity for the town. The 4.8 hectares of development space so allocated, must now be re-visited to plan for the anticipated 46% increase in demand by 2030 for older person accommodation, (Cornwall Local Plan), and the very real need to provide for young professionals in the town that service the many businesses and tourism sector in the town. There is absolutely no need for more students to be accommodated here. They are perfectly capable of travelling a few minutes by bus from an out of town campus, preferably to be located at Pool/ Camborne areas. There are at present just under 5,000 students resident in the two towns with about 75% in Falmouth. At least 1,200 of these occupy properties in the narrow strip of properties that make up the shopping centre of Falmouth. Had the SA-DPD three town sites been included this would have added a further 800 in the small town centre, totally changing the characteristics of the town.</p> <p>Housing. The freeing up of 4.8 hectares could provide for upto 215 units of general housing need. These small communities, integrated into the town would then also reduce the demand for edge of town Green Field development space - of boring uni-character houses. That green space could then be integrated into the aspiration to reserve green space for recreation.</p> <p>With regard to rental properties, a provision whereby the Town Council could take restorative action to ensure that the external appearance and standard of maintenance of all rental properties does not fall below a attractiveness of many of our historical terraces. standard. There are already provisions within the HRSS scheme operated by Council Public Sector Housing that could be strengthened to facilitate this role.</p> <p>It is very noticeable that whole streets, parts of streets and individual rental properties are of such a poor standard of maintenance and management that this has led to a serious decline in the appearance of our historical terraces. The owners/ landlords must be held to account. Such a measure would also help to slow the sale of adjacent properties by householders</p>	No	C5

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<p>that fear for the devaluation of their own properties. Parts of Falmouth are on the road to becoming no better than deprived areas of the East End of London (personal experience).</p>		
<p>In my opinion this plan is seriously flawed because sites within the town have been identified as 'possible Student accommodation'. Once this plan is adopted it will be impossible for the council to object to any student accommodation development proposals in these locations as they will form part of the accepted plan. Is this what the council really want to happen? Will they say " Sorry our hands are tied, it is in the plan and the public did not object!" It was significant that it was ONLY the plan references to the possible student blocks that was omitted from the large display boards presenting the proposals at the public viewing venues! Throughout the plan there are so many references to maintaining the historical character of Falmouth and maintaining community cohesion and yet the plan as it stands would allow huge, high density purpose built student blocks right within the very area where the plan also says it will restrict the continued growth of HMO conversions. Falmouth knows only too well how damaging large concentrations of student residences have been to the community. How can the Council justify this inclusion? Surely it is not thought that large blocks of students will have less impact than scattered HMOs and smaller student houses! The plan also suggests some of the identified car park sites will be suitable for mixed accommodation, where students and local-needs residents can have purpose built homes provided. Who would choose to buy or rent in such a development? Apart from Landlords of course! The reason why huge areas of Falmouth have become 'student land' is because local residents have moved out to avoid the disruption caused and landlords have happily bought the vacant houses. If mixed developments are built it will not be long before all the properties are in the hands of landlords and the most likely tenants will be students. If private landlords own the properties, any restrictions envisaged by the Council, such as limiting to students only, will be void and homes will then become available to the lucrative summer holiday-lets market, which is likely to have a knock-on effect on small hotels and B&amp;B businesses which, if they become uneconomic, will then only be affordable as HMO developments.</p> <p>Please think again and remove the inclusion of any possible student accommodation from the plan.</p> <p>This would protect Falmouth from irreparable damage to both community cohesion and developments that are not in the character of our beautiful historic town, whilst also forcing the University to allow developers to build accommodation on campus where it really should be!</p>	no	C6

Comment Received	LNDP Meets expectations	Reference Look-Up
<p>The majority of the plan is sound and I appreciate the amount of work done to create it. BUT although students have always been a welcome part of our diverse community, the balance between Falmouth residents and transient student population has seriously damaged cohesion and has resulted in negativity towards the students, who are not the architects of this situation, and the University, which has most definitely ignored local views because of its own expansion and business plans.</p> <p>Building possible future Student accommodation consideration into OUR plan is accepting that the growth of the University is more important than its affect on our community. Of course the University will continue to grow but ALL future accommodation should be on campus so that no further damage is done to the balance of our community.</p> <p>I implore you to think this through, remove all identified areas for student accommodation development that are in the town area because, if you leave the plan as it is, everyone of those 'possible' areas will become student 'ghettos' and Falmouth will never recover!</p>		
<p>p.40 Policy BE 1 - 'Supporting the harbour, port and docks'</p> <p>I do not have a strong view on the dredging of the harbour per se, but I would like to see clear acknowledgement in the plan of the growing awareness of the dangerous pollution levels created by cruise ships, particularly the larger vessels that dredging is claimed to facilitate. I say this because the levels of air pollution and drop in air quality likely to result in Falmouth from increased and larger cruise ship visits seems at odds with two of the three principles driving the plan: 'Living within our environmental limits' and 'Ensuring a strong, healthy and just society'. The plan's measures to increase outdoor activity and preservation and enjoyment of our natural environment would be undermined by a significant drop in the quality of air that has been evidenced where cruise ships dock. I link to only one recent article on this to show it as a current environmental concern, but clearly there is a lot more information - including research based evidence - available online: <a href="https://www.theguardian.com/environment/2017/jan/08/ports-pollution-cruising-ships-freight-sea">https://www.theguardian.com/environment/2017/jan/08/ports-pollution-cruising-ships-freight-sea</a></p> <p>The plan should surely clearly articulate a commitment to examine the protection of our environment and the pursuit of economic benefits against the risks and dangers to public health posed by a potentially so significant increase in air pollution?</p>	Yes	C7

Comment Received	LNDP Meets expectations	Reference Look-Up
<p>P.22 - Housing and Regeneration</p> <p>The plan is positive regarding what it supports and proposes regarding housing, and the focus on sustainable, appropriately sited and managed student accommodation and increased residential non-student accommodation is welcome. But there is no mention in the plan of two types of development that regularly upset the people of Falmouth - 'luxury' housing and luxury retirement developments. These invariably occupy 'prime' real estate in terms of views and vista, and also tend to facilitate out-of-county developers benefiting financially from new high cost accommodation of the type that is already, in the view of many locals, plentiful in Falmouth. These types of development also have a tendency to cram as many units into a small space as possible, to maximise developers' returns, and in many cases result in under-occupancy (second homes). I would welcome a view in the neighbourhood plan that such development will not be favoured in locations where affordable residential accommodation could be developed, or until such time as the pressing needs of affordable residential and student accommodation is met. I would also like to see 'overdevelopment' of residential sites more clearly articulated and opposed by the plan. I question the ongoing principle of developers of luxury builds in prime locations gaining approval by providing some (small) funding to the council for affordable housing elsewhere in the area (invariable NOT in prime locations with good views or vistas or within walking distance to the town centre).</p> <p>p.39 - 'Business and Employment'</p> <p>Tourism is only mentioned in passing, in relation to some of the facilities to be used by tourists. I would like to see the plan articulate a view on the nature of holiday accommodation desired or required in Falmouth. For example, at present we are witnessing a reduction in the number of family run Falmouth hotels (lost to fire / retirement development etc.) and proposals for a chain hotel and current replacement of a large hotel with exclusive residential seafront apartments for a few wealthy individuals. The neighbourhood plan talks about the character of Falmouth, and I would like to see it setting some parameters for developments that are put forward in the name of supporting or encouraging tourism, or likely to impact Falmouth's capacity for tourists. I would like to see a principle to resist the turning over of portions of the seafront (or riverfront) from publically accessible hotels that provide rolling accommodation for thousands of visitors (and year-round facility access for locals) to private developments which certainly do not.</p>		



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<p>Just the above points. I think that otherwise the plan is well considered and seems to represent a good balance of needs across the community, addressing some of the most pressing considerations and putting in place clear policy intentions to protect and enhance the town in way that many have talked about for many years (Church Street and Quarry development and regeneration being notable examples)</p>		
<p>It's an impressive piece of work</p> <p>The need for small scale enterprise spaces needs emphasizing. As computers and things like 3D printers increasingly helps people start-up small businesses, the shortage of small scale studios/workshops will become increasingly critical.</p>	Yes	C8
<p>Totally support the key objectives of policy No 5 and particularly p 28 key objectives 'Accomodating students'; Ditto the key objectives of policy No 8 , p 42, particularly the 'green corridor and garden walk' MUST reinforce the message that our historic gardens , Fox Rosehill, Gyllyngdune, Queen Mary's , Kimberley Park , must NOT be encroached or diminished , need to reclaim our heritage title as 'Falmouth - the garden by the sea.' Totally support the key objectives of policy no 10, p 50, particularly second paragraph 'cultural..health..well being activities..including a cultural hub. It's ' VITAL that 'hub' be INCLUSIVE , accessible to all groups, activities, ages, and NOT perceived as ' not for the likes of us.</p> <p>I am awed by the hours of work and dedication that has produced such a detailed. thoughtful, but seemingly achievable blueprint. Nothing is beyond the 'realms of possibility' if the implementation is driven by the same convictions - and by community support.</p> <p>The only element that saddens me, and this a personal comment, and probably not something you can address, is the sometimes confrontational , hostile, personalised level of debate on the streets, in the council chamber and at 'public interest' meetings on some of these issues, particularly 'town versus gown' .</p>	Yes	C9
<p>Fully support the Green Corridor concept; however, significant sections of it between Tregonigie Woodland and Swanpool are much in need of opening up and providing proper waymarked, well-surfaced routes</p>		C10

Comment Received	LNDP Meets expectations	Reference Look-Up
<p>1. Parts of unused areas on the Tregoniggie Industrial estate could be given over to allotments; there are enough industrial sites available but not enough locations for people to grow their own food, or where children might learn more about growing their own food.</p> <p>2. The cycle routes proposed/constructed thus far do not always accord with what is best for cyclists; need to minimize altitudinal variation as much as possible as an absolute priority and ensure ready access to town centre shops and other facilities. Cycle route through Tregoniggie Woodland should be diverted along Conway Road to (a) improve speed and directness of route and (b) remove the conflict between cyclists and walkers.</p> <p>3. As a priority for tourists and residents alike a shoreline walking route all the way from Penryn Bridge to Pendennis Point, including steel walkways over the tidal area where buildings prevent a conventional path from being installed (eg between Greenbank Hotel and Prince of Wales Pier and Church Street Car Park (which should not be a car park at all) and Custom House Quay and Events Square. What a walk that would be!</p> <p>4. The Green Corridor to continue out into the countryside around Budock Water, which although outside of the plan area needs to be kept open to make sense of the Green Corridor, including a route in and out for wildlife, as well as for people walking its length.</p>		
<p>Broadly in agreement with most of the proposals, especially regarding enhancements to the waterfront areas and improving pedestrian access in the town centre. Reduction of traffic through town and priority to pedestrians should be high up on the agenda. Free parking in surrounding areas (like the Quarry) and increased pedestrian-only times in the high street would encourage more tourists/shoppers to Falmouth. The Moor could retain parking for those with mobility difficulties.</p> <p>There is concern with regard to the dredging of the harbour, as the environmental impact that this might have is not fully understood or accounted for. Falmouth should not risk losing rare habitats that are of special scientific and ecological significance.</p> <p>More specific and detailed reference to open areas/spaces designated for improvement, and what this might entail - e.g. the Beacon park would really benefit from improvements (beyond what is hinted at in the Working Group survey) and this, in turn, would benefit the Beacon/Old Hill community. It should be noted that the Resource Centre on Old Hill is no longer in</p>		<p><b>C11</b></p>

Comment Received	LNDP Meets expectations	Reference Look-Up
<p>operation; the community should have a hub/focal point for which it can take ownership. A midwife-led maternity unit, as part of the Community Hospital improvement plan, would be most welcome, although it is recognised that this may be beyond the ambit of the Development Plan.</p>		
<p>The plan is comprehensive and would definitely help to retain the character of the town and enhance the area PROVIDED that the County council take note of the wishes of the people who live in Falmouth. We particularly support the approach re environment and open spaces (the green corridors ,Pendennis headland ) and the constructive approach to housing students . It would have been helpful to have greater clarity regarding maintaining/improving access for people with limited mobility to access different areas of the town ,and also to have had a recommendation to maintain free parking at key local beauty spots (e.g. Swanpool &amp; Pendennis headland ) so that they remain accessible to everyone . It would have also been useful to explore whether the train service could be improved i.e. the timing to connect with services to London and also extend the timetable slightly so that people could attend eve events in Truro by public transport ( esp Hall for Cornwall )</p> <p>Greater focus on</p> <ul style="list-style-type: none"> <li>- protecting the open spaces that 'frame ' the town and the existing ' green corridors /areas'</li> <li>-criteria that ensure proposals for any new buildings do not sacrifice the 'traditional design aspects of Falmouth' in favour of 'innovative ' designs that are totally out of character with the area</li> <li>-maintaining free parking along local beauty spots esp Pendennis headland and Swanpool so that they remain accessible to all</li> </ul>	Yes	C12
<p>There are some good points but disagree that students accommodation could be built at Quarry &amp; TA car parks,Accommodation should be built by University on their campus. These should be left as car parks for Locals and visitors.Also feel no more facilities for maritime visitors at Church Street car park,and more facilities for LOCALS. If the plan is to encourage more visitors and more retail business into Falmouth then there has to be adequate car parking for visitors and at suitable locations.</p>		C13
<p>I strongly support the plan as a whole and think it is very necessary.</p>	Yes	C14

Comment Received	LNDP Meets expectations	Reference Look-Up
<p>On the Town Centre, the objectives are good, but the pedestrianisation, management of traffic, shuttle bus service and general improvements have no explicit policy in the document. An effective policy should be added</p> <p>A policy, as above, added to the Town Centre Section 6</p>		
<p>Approaching this from a local resident's view and the view of a professional working in the housing sector in Falmouth, the following questions need to be answered after months and months of trying!</p> <p>We have been petitioning the Council for some time now for further information regarding the Article 4 Directive. We have also been along to the Drop in session on the Moor on Saturday afternoon but they couldn't really answer any of our questions and just told us that Article 4 is happening basically and to comment on the online plan, so here we are!</p> <p>1) How will Article 4 affect properties that historically are holiday let or owner occupied through the summer and then student let 10 months of the year?</p> <p>2) How will Article 4 affect a property that has a HMO licence but is used for holiday let / owner occupied during the summer months but student let for 10 months.</p> <p>3) How long can a property with existing HMO use be left empty for renovation works etc before reverting if at all to C3 use.</p> <p>4) The control of HMO's using Article 4 will affect available accommodation for non-students and local companies that rent small HMO's. There are a number of local companies that rent small HMO to house their workers and also groups of professional workers that rent a house together as a way of affording local housing or saving fro deposits etc. The restriction could have an effect on local businesses and could lead to an increase in 'sofa surfing' and in some extreme cases rough sleeping. How will the planning policy meet the needs of these groups of people?</p> <p>5) Are the local residents/homeowners aware of the likely impact Article 4 may have on residential house prices, especially in heavily populated student areas. Some Article 4 cities have reported a 20% decrease in residential property prices.</p>	Yes	C15

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<p>6) How long can a property be empty i.e: for refurbishment where existing established HMO use already exists before it would not count as a C4.</p> <p>7) How will the Council/Town monitor unlicensed/smaller HMO's?</p> <p>(NB 6 near identical responses were received referring to these issues.For responses, see note 1 below)</p>		
<p>I would like to see a marked balance between infill housing and the development of open spaces</p>	Yes	C16
<p>Generally I think the plan has a good balance of development. I think it is especially important to improve Church Street car park and reduce the amount of traffic in the town centre. I would also like to see more segregated cycling provision around the town and the opportunity to cycle the other way down the one way streets (as they do with no harm to pedestrians on the continent all the time)</p> <p>There is little or no mention of sustainability with regard to energy (ie electric car charging, encouraging solar electricity, renewable energy for the docks etc). There is also no mention of reducing our carbon footprint as a town which we must do if we are to avoid further flooding and mayhem in the town centre. Active mitigation to avoid flooding must surely be a priority.</p>	Yes	C17
<p>I am in support of the Falmouth Neighbourhood Plan which I think is a comprehensive and balanced plan.</p>	Yes	C18
<p>p.8 this is important as so much of the green space and farming land around Falmouth has disappeared. The problem being; the areas I most value, such as the green spaces near Swanpool beach, the land between Budock and Falmouth, might not be included in the collective 'we value'.</p> <p>p.9. Dispelling cynicism is important as local people can feel that the urban sprawl that surrounds Falmouth and continues to grow, could be seen as a means to generate money for investors and councils rather than meet the needs of the local community.</p> <p>P.11 Maintaining Falmouth as a strategic shopping centre is vital for the health of the local community who rely on the town to supply their requirements and to attract tourists. The permission given to supermarkets to build on the outskirts of Falmouth,</p>		C19

Comment Received	LNDP Meets expectations	Reference Look-Up
<p>offering free parking and many special offers, has enticed the financial resources away from the town.</p> <p>p.13 'Achieve....sustainable living.' This is an admirable goal, however, with the need to produce more home grown food and with the uncertainties of 'BREXIT' it appears a short-sighted decision to allow the selling of arable land which once provided food, such as that north of Bickland Road, to developers.</p> <p>p.14 control the number of family homes converted into houses with multiple occupancy. This is vital. Walking around the town there is a startling number of houses with the 'To Let' sign outside. It makes one wonder whether people are purchasing homes to do just that. This has a major impact in a road where the sense of community becomes diluted due to the presence of a transient population. Multiple occupancy can also lead to an extra number of vehicles parked in the road, which leads to people converting front gardens to car bays and decimating the local flora and fauna.</p> <p>p.15 'exciting new opportunities..... for tourism...' Great, except with all the new 'towns' to be built and the disappearance of the few remaining areas of countryside in and around Falmouth, who wants to spend their holiday on a huge housing estate?</p> <p>p22 Falmouth's urban extension lies outside its boundaries.... Penryn and Budock, .... but the impact of growth is on Falmouth..... The pressure on the hospital and surgeries and schools in Falmouth is a major social and economic problem. However, there has been and will continue to be a price paid by Budock and Penryn in that their historic charm and unique characteristics are being drastically eroded through over development and increasing volume of traffic.</p> <p>Halt the building of the new towns in order to diminish the urban sprawl. Maintain the green spaces that remain between Budock and Falmouth to allow Budock Church and village to keep what is left of its character.</p> <p>Stop the rise of changing family homes to multiple occupancy.</p> <p>Ensure home owners are obliged to maintain their houses to a reasonable level and at the very least clear the litter in their front gardens and pavement in front of their house.</p> <p>Adopt the policy of St. Ives council and discourage the purchase of property as a second home merely for financial gain.</p> <p>Support shop keepers in the town to remain in business by improving car parking facilities and creating seating and pedestrian walk ways for shoppers.</p> <p>Not allow new housing developments to use similar names as older areas. e.g. Swanvale has been used as Swan Vale by a housing development on the oil tanks and has caused postal and directional confusion.</p> <p>Encourage the cleaning up of Gyllngvase sea front with reference to the destroyed Falmouth Hotel site.</p>		

Comment Received	LNDP Meets expectations	Reference Look-Up
<p>Ensure that all green spaces are protected in order to provide Falmouth with the 'lungs' it needs. Protect the supply of clean water to Falmouth and the disposal of sewage by halting the over development of the area.</p>		
<p>Support</p>	<p><b>Yes</b></p>	<p><b>C20</b></p>
<p>I fully support the policies listed in the Environment and Open Space section of the Plan. In the context of nationwide loss in greenfield sites to housing and other developments, it is refreshing to read that the value of open/green spaces is acknowledged and that the Town Council intend to protect them for future generations. It would be interesting to know how the Town Council's proposals will fit into Cornwall Council's planning priorities (i.e. the recently started housing development in the former playing field of Falmouth School). Also, what steps will be taken to encourage biodiversity in parks and open spaces, and around the edges of recreation grounds?</p> <p>After inquiring, it would appear as though the label placed on Figure 20 which indicates that the former Tregenver School site is a 'site suggested for more accessible location for replacement leisure centre' is no longer being considered.</p>	<p><b>Yes</b></p>	<p><b>C21</b></p>
<p>I would support the proposal that the Coachworks C.18 be developed as local housing. There is a pre planning application to develop the site as student accommodation which would contravene all the points you cover for permitting a new build student residence and it is important that we do not allow such developments to take place. The roof line would be much higher than existing buildings (the same level as the road above) and so would not be in keeping with the local area and the size/mass/design of buildings. It would have a detrimental effect on both Penwerris Lane and Meadowbank Road properties in terms of lighting, privacy, noise etc and the density of students in an otherwise extremely quiet residential area would be hugely out of balance. They say they will not allow student parking on site but that will be impossible to police and Penwerris Lane is a narrow lane which cannot accommodate the traffic increase caused by the proposal. It is also important to make sure that Falmouth remains a town with students, not a student town with locals and there are plenty of sites which would more suitable for student development as per your infill listing.</p>	<p><b>Yes</b></p>	<p><b>C22</b></p>
<p>We do not believe there is any evidence, to support a Residents Parking Scheme in Falmouth. Judging by the open days for this , no public support either.</p>	<p><b>Yes</b></p>	<p><b>C23</b></p>

Comment Received	LNDP Meets expectations	Reference Look-Up
<p>The university should take more responsibility to provide long term parking for those students requiring to bring a car to Falmouth.</p>		
<p>This is a commendable document, and contains idealistic proposals, many of which of course will not be practical, as we just do not have and are unlikely to have the wealth to implement them - unless Falmouth's populous becomes unexpectedly wealthy.</p> <p>A great pity his document was not conceived 10+ years ago - it is simply too late, much of the damage is already done - and as a working plan will not be effective for quite some time. How long will Cornwall Council and the government take to ratify the plan ? There could be years of 'to and fro' and re-writing the content to make it acceptable/legal.</p>		<b>C24</b>
<p>I appreciate the wish to form communities within Falmouth rather than just build houses. However this policy proposal involves building on land which is in the Parish of Budock Water. It should form part of Budock's Neighbourhood Plan not Falmouth's. I also think consultation with Budock Parish Council would be more appropriate than high handedly offering it 'guidance'!</p> <p>The proposals to stop the increase in HMOs for students badly damaging the community of Falmouth are good but I would like to know what happens if the measures proposed are over-ridden or subverted? So more information on enforcement would be good.</p>		<b>C25</b>
<p>Forgive me if this comment doesn't add much to the debate, but I do think the plan is pretty much perfect. I look forward to as much of it being implemented as is possible</p>	<b>Yes</b>	<b>C26</b>
<p>It is disappointing that the plan appears to offer up all our green field sites for housing especially as there appear to be no reservations requiring green spaces to be included in the developments.</p>	<b>No</b>	<b>C27</b>



Comment Received	LNDP Meets expectations	Reference Look-Up
<p>Are the green belt areas around our coast line adequately protected from future development? Is it possible to designate any remaining coastal sites such as Bowyer's Cellars specifically for future development for leisure boating, which is so important to Falmouth?</p> <p>I would like to see a planned increase in the areas of green space within the plan area and especially in any new development.</p> <p>I would like to see a policy of developing the town water side areas specifically for improving leisure yachting and boating facilities. This could be achieved by extending the Gas works car park along the back of existing main street shops.</p>		
<p>I welcome the plan and in the main I agree with the contents however to ask the public to comment in detail in a few short weeks about something that has taken two years to prepare is totally unrealistic.</p> <p>One major omission is any mention of Residents Parking and the introduction of charging for on street parking. I have not heard one single person who is in favour of Residents Parking. Those who would be affected by the proposals think the timing is completely wrong. They don't want the excluded period to be during the day they want it during the night. The proposals mean that If their car is parked near their house, they leave for work in Truro, Redruth etc. but the space they have vacated will then remain empty for the whole of the day. Now someone working in town can use that parking space space during the day. The person who lives in the restriced area wants to be able to park close to their house when they return from work.</p> <p>Charging for on street parking is purely a money making venture and will not help reduce parking it will only move it further from the town centre.</p> <p>The provision of purpose built student accomodation is a must. I support most of the proposals that are not too close to residential areas. Student accomodation however must have ample parking. I cannot believe that Cornwall Council approve plans without ample parking. Students do not only come to Falmouth/Penryn because of the quality of the University many come here rather than elsewhere because of the attractions of Falmouth and Cornwall. They, like us who live here, want to visit the many wonderful parts of Cornwall because there are so many delightful places to visit. Many are not at all easy to get</p>	Yes	C28

Comment Received	LNDP Meets expectations	Reference Look-Up
<p>to by public transport. Many of the students also come because of the many opportunities to engage in water sports. They have the opportunity to surf or windsurf on both coasts depending on the wind conditions. They may go to Marizion on Saturday and Newquay or Perannporth on Sunday. They can't take their surf board or windsurf board on the bus or their cycle. Do the planners live in the real world? They bring their cars to transport their gear and expect to be able to park them close to where they live.</p> <p>I must admit I have not read all 63 pages. It is far too long to read on screen in such a short time. I am very much in favour of parking in the Quarry with apartments around the edges and on top. It has been advocated many times over the last decade. We do not want to lose any parking spaces though and the continuation of the Town Bus is vital. Before the introduction of the bus this car park was little used by locals. Parking with dwellings on top in the old TA centre is a good idea.</p> <p>I very much like the proposals for the Church Street car park. Unfortunately we have seen many exiting proposals over the last decade none of which have come to fruition.</p> <p>The position of major housing developments are good. We must ensure that there is ample provision for low cost housing, particularly shared ownership. I know of two or three couples who bought into shared ownership one bedroom flats that was all they could afford but now want to move into shared onership two or three bedroomed houses with a garden but there is nothing available.</p>		
<p>In general this section makes numerous claims about the proportion of age groups in the town which are not supported by any data provided in the document, nor are any sources cited for validation. The way the paragraph (and the document as a whole) is worded reads as if it has been written by somebody with an anti-student bias. For instance, it is quoted in parentheses that 18-23 year-old make up 'nearly 16% of the population', yet no other age groups are singled out. Arguably, very little of this section actually addresses social issues, but merely imposes limits on student growth and panders to nimby anti-student sentiment.</p>	<b>No</b>	<b>C29</b>

Comment Received	LNDP Meets expectations	Reference Look-Up
<p>The Neighbourhood Plan is a professional and robust document and one I wholeheartedly endorse. While there are some areas where potential development is indicated which individually I do not agree with and some protected sites where I believe some sensitive low density sustainable development might be worthwhile I believe the document as a whole is one I will support at referendum</p> <p>Elimination of 'management speak' and unexplained acronyms to make it a more useful document for the general public</p>	Yes	C30
<p>No evidence of identification of unlisted heritage assets and their value to the local community.  No evidence of specific key viewpoints and vistas and their value to the local community.  The identification and development of environmental and open space projects and cultural projects for the benefit of the community should be led and decided by the community, rather than funding unilaterally allocated by Town Council.  I question the proposal of developing Dracaena Skate Park as a "tourist destination for skateboarders and their families". Is there evidence to support this as a development beyond a community asset? Why would this significantly enhance Falmouth specifically as a tourist destination?</p> <p>No mention of criteria to demonstrate mitigation/impact of harbour developments on environment and marine life</p> <p>Limited reference to design criteria - height, quality of design, scale, materials etc. No indication of preference to applications included level of allocated parking according to property size. Given the town has been recently surveyed on the issue of parking permits and this has caused a high level of concern, i am very disappointed this matter has not been addressed.</p> <p>Object to proposed housing density of 70 - 120 dph. Do not consider this is in keeping with maintaining high quality housing or living environment, or maintaining levels of health and wellbeing.</p> <p>Rugby Club site referred to as MJ4 site improvements, not identified as club/pitch. page 25 refers to "The retention/enhancement of community facilities as required in the Cornwall Local Plan". Page 42 - survey rated the importance</p>	No	C31

Comment Received	LNDP Meets expectations	Reference Look-Up
<p>of protection of local green spaces and importance of sports and leisure sites. Comments stated appear to be in opposition to Policy FOS 5.</p> <p>No definition of "infill" - developers can challenge in relation to Local Plan Shop front design - no reference to improvement of streetscape and quality of shop design (is being addressed in other NDPs within Cornwall)</p> <p>No reference to Shoreline Management Plan, CCMA's etc - importance of coastline to community and tourism within town, restricting inappropriate development Renewable energy &amp; energy efficiency - policy area included in other NDPs, given activity of Fal Energy Group &amp; Transition Falmouth this is surprising, also policy area highly relevant to living within our environmental needs/means</p> <p>Flooding &amp; climate change - any restrictions/limitations proposed on future developments? Evidence base - limited and not robust</p> <p>Consultation process - limited. Only info on opportunities to comment on plan in local paper. Only 1 event outside of working hours and none at a weekend, restricting working people to commenting online. I had assumed residents would be notified of this activity by flyer etc, but to date not received anything. Limited opportunity to engage and comment. Website not kept up-to-date. Difficult to comment on plan without sending numerous emails! sorry about that!</p> <p>Sadly I do not support the Falmouth Neighbourhood Plan in its current state. I do not feel the majority of residents are sufficiently aware of the Plan, its process and how to contribute.</p>		
<p>Further to attending the consultation at Falmouth Library last week and speaking to representatives there, I was very concerned that the community space on the Beacon Estate, opposite Falmouth Primary Academy, was not marked by any colour code. This suggested a vulnerability and ambiguity regarding plans for this land. At present it is an ESSENTIAL community space used respectfully and regularly by children, parents, residents and the wider community. On speaking to a</p>	<b>No</b>	<b>C32</b>

Comment Received	LNDP Meets expectations	Reference Look-Up
<p>representative, he assured me that the Beacon open space and adjacent playground is, in fact, scheduled for protection in the Neighbourhood Plan. He stated that these spaces have been given reference numbers by both the Falmouth Plan and Cornwall Town Council. I am keen that this protected status be flagged, colour coded and made clear on the town plan and supporting documents please as at present it remains unmarked on the above mentioned map. This is an essential open space for Beacon residents and we want it protected.</p> <p>As above, I would like to see the protected status of the Beacon open space and park absolutely clear in the plan documentation. In addition, like most residents of Old Hill and the surrounding Penwerris Terrace areas, we object to plans for many more student homes or the like, when the roads and parking cannot possible sustain or support the increase in cars and traffic that these residents will bring</p>		
<p>I support wholeheartedly making better use of Church Street Car Park, it could be a real asset to the town. I agree with the displaced car parking being replaced with decked parking in the Quarry, but not very high decked parking on the TA site.</p> <p>Also: Page 38, policy TC 3 - I do not agree that the development should be 4 storeys high - that is too many, unless one storey is underground. I think the building would be too imposing.</p> <p>Also: Page 49, policy TCON 2 - I am totally against charging residents, who have suffered the woes, as well as benefits, of the vast student influx. It adds insult to injury when residents are paying the shortfall in lost Council Tax revenues to charge them even more, just for the opportunity to park, where they should be able to anyway.</p> <p>Also: Page 45, Policies PROJECT FOS 1 through to FOS 7 - I support all of these and think they will improve town management and facilities / amenities for residents etc.</p> <p>Finally, there is too little mention, or protection of, tourism. I know Candy Atherton acknowledged this at the Town Council meeting on Monday 23rd Jan. I suggest that the Carrick Council Saved Policy 11C would be a very suitable starting point - "In</p>	Yes	C33

Comment Received	LNDP Meets expectations	Reference Look-Up
<p>the Prime Seafront Hotel Area of Falmouth the conversion of hotels and guesthouses to uses other than holiday accommodation will not be approved where they have an adverse impact on the tourist character of the area" but should go wider and preserve tourist beds in other parts of the town as well. Also, there should be protection for other tourist facilities; it is lamentable that Ocean Bowl is now closed. That only leaves 2 wet weather attractions for visitors and locals alike.</p> <p>It should be proof read. There are many minor errors that need to be corrected - I am willing to assist with proof reading if necessary. For example, page 41, policy BE 9 seems to have wording missing at the end of the paragraph.</p>		
<p>I support the hmo plans, I worry about loss of the green sustainability, and lack of vision in making falmouth a greener more environmentally friendly town.</p> <p>I would like to see more emphasis on green transport alternatives, I feel as a expanding town the plans we rely to heavily on cars and transport for journeys around town and short distances. More cycle parking spots are welcome but more cycle routes, and a cycle hire scheme for tourists and commuters linking the university, penryn to falmouth and beaches. Also more to help support the town infrastructure, with more emphasis on supporting health care, leisure facilities, with rapidly expanding numbers and visitors more in terms of cars.</p> <p>Ensuring on going protection of green spaces, allocating space to more town allotments the waiting list for them is very long, there are too few for local demand. Also protecting green areas like the parks and Pendennis, I am glad that views and vistas are planning to be protected.</p>		<p><b>C34</b></p>

Comment Received	LNDP Meets expectations	Reference Look-Up
<p>I congratulate all concerned for a well thought out and readable report. It appears to cover all areas well with regard for further development, or otherwise. I am pleased that most of the Green areas within the plan are being protected.</p> <p>I do feel sad that there has to be development on the Budock side of Bickland Water Road. I do hope development here will be kept to a minimum and not be allowed to creep up to the village itself. However I do realise that now we have the University requiring accommodation this has left local people with a lack of homes. As a relative newcomer to Falmouth I feel completely bemused that student residences were not properly designed and in place before the first students arrived.</p>	Yes	C35
<p>I think the whole plan comprehensively covers all issues to my satisfaction.</p>	Yes	C36
<p>Strongly agree to protect and make the most of our remaining green spaces from pendenis past swanpool Which run along the coast which help to make Falmouth a great place to live,and visit.</p>	Yes	C37
<p>I feel very strongly that the closure of Church St car park will penalise older more infirm people without disabled stickers who live around Falmouth who pop in to use the shops in Church St. There are no other convenient car parks.</p>	No	C38
<p>I am against the proposed Article 4 which would affect my property. I live in Lister Street/ Killigrew street with my young family. I am concerned that this policy could affect the value of my property if it is unable to be let in the future and also my right as a home-owner to let it out if i choose.</p> <p>We live in a high density student and rental area but have a young family. I do not think it is fair or appropriate to place a blanket ban on homes in this area being let to students in the future if 95% of properties are already being used as such. It would seem fairer and sensible if each application was decided on a case-by-case basis looking at the types and uses of properties already there.</p> <p>I am also concerned that the proposed residents parking scheme will make it harder for us to park. The permits will forbid us</p>	No	C39

Comment Received	LNDP Meets expectations	Reference Look-Up
<p>from parking on the streets that we currently use and which are nearest our home. As a result i will need to park further away from my home which will make it harder for me with two young children.</p> <p>Better and clearer consultation in plain english. I don't think many residents in Falmouth understand or are even aware of the Article 4 proposal and how it will affect them. It doesn't seem to have been communicated very clearly. I read the planning notice on the lamppost but didn't really understand or realise the implications it would have until i spoke to someone about it recently. I think most residents are unaware of how this will affect them.</p> <p>I was also told that everyone who will be affected by the Residents Parking Scheme will receive a letter but we didn't.</p>		
<p>Please include a policy to support Community-Led Housing. Cornwall has secured over £5M of funding to support this and the Neighbourhood Plan needs to include a policy to support this kind of development. This can be included on infill sites and also part of larger housing developments. Similarly, custom build and self building housing should be promoted within the policy. Sites should be identified and allocated in the neighbourhood plan to meet demand for this kind of development.</p> <p>The delivery plan is weak. The Neighbourhood Plan should provide a list of specific S106/CIL works required to be funded by all developments coming forward. This will enable affordable homes, local centres, doctors surgeries, open space improvements etc to actually be delivered. The suggestion of 'waiting until resources come forward' I feel completely misses the point of having a neighbourhood plan.</p> <p>The High Street should be closed to all non-vital traffic . Given the proposals for the Church Street Car Park there is limited reason for cars entering the High Street and so no 'through-traffic' from one end of the town centre to the other should not be supported.</p> <p>A policy covering the High Street should be added given the significant concentration of employment - retail / office / community etc. This, similar to The Moor, should seek to promote diversification of the economy whilst protecting the buildings and public realm.</p>	Yes	C40



Comment Received	LNDP Meets expectations	Reference Look-Up
<p>The site is within the ownership of the Homes and Communities Agency and revenue from the car park supports the NMMC. Any redevelopment should seek to retain car parking and in order to aid viability and deliverability a mixed use scheme should be supported in the Plan. This could be housing, but it could also be retail or a hotel, subject to the other policies within the Plan.</p>		
<p>I suport the overall vision and aims  I like page 17 - protect the coastal area from development and green corridors idea  I like page 24 HR1  none, overall very happy and a hugely impressive piece of work, many thanks to those who made it happen</p>	Yes	C41
<p>Seems a really good plan. I disagree with the Coachworks site being endorsed for development for student accommodation. It is in a narrow street, excessive numbers of students proposed, parking is a huge problem along Penwerris Lane. Plus it's not near to the Universities. It's a residential area and with alternative sites near Tremough it's the wrong place at the wrong time, trying to squeeze it in before plans change to protect the area for residents. Unsure about building a multi-storey car park at TA site. There is a good 'open' feeling in that area to event square.</p>		C42
<p>I live in Marlborough Road and have always enjoyed living in a "student area". I would like to object to the proposals for a Residents' Parking Scheme. It is usually possible to find a parking space close to our house and, if not, then a short walk is the price we pay for the increase in cars on the roads. The main problem is not with residents' cars (including students) but with the daily commuters who work in town and the parents dropping off and picking up children from King Charles School. Having a scheme which charges residents for the privilege of parking where they have done for years is quite unnecessary. More parking for workers in Falmouth is necessary.</p>		C43

Comment Received	LNDP Meets expectations	Reference Look-Up
<p>1. I agree Town centre priorities really must be for pedestrians and cyclists</p> <p>2. In order for fewer people to bring cars to Falmouth, public transport really does have to be excellent. We are no where near to 'every home within 5 minutes of a bus stop'. This is also useless unless bus services are frequent.</p> <p>3. Until cycle paths and bus services are substantially improved, the total number of car parking places should not be reduced from current levels.</p> <p>4. I support the regeneration of Church Street Car Park and introduction of a barrier near Superdrug</p> <p>It is mainly great, I support most of its ambitions. However many of the most exciting recommendations are going to cost much more than we can afford. I would like to see it costed. It' works as a beautiful whole. Take out the expensive parts, eg improved public transport, and it doesn't work.</p> <p>It is not the right answer simply to build on car parks, thus creating more town centre residents who need parking plus the original users of the car parks ...with nowhere to park and poor public transport or no safe cycle routes. If you do this, all the good ideas about festivals and a vibrant town will be wasted because visitors and locals who have to come to the town by car will be deterred by poor parking.</p>	yes	C44
<p>I am in full support of the proposed plan due to its considerations of what contributes to sustainable development.</p> <p>In addition, I have had the pleasure to speak with Mike Jenks about this project, and I was very impressed as many aspects had been included in a sustainable manner</p>	yes	C45
<p>HMOs in Church Terrace, Tregenver Road, Trgenver Villas have been allowed to proliferate, this area/road with the on-street parking is really now only suitable for one way use.</p> <p>HS3 and HS4 developments should be more specific, volunteers on duty at drop in display were trying to explain what was shown on the plan but it was not necessarily correct. This needs to be rectified.</p>	Yes	C46
<p>The Neighbourhood Plan is an important document and I believe, in principle, should be approved by the residents of Falmouth.</p> <p>However, there are some points that concern me and they are as follows:</p>		C47

Comment Received	LNDP Meets expectations	Reference Look-Up
<p><b>Page 31 - final and penultimate paragraph</b></p> <p>I believe that many residents of Falmouth do not want the University to expand, instead to utilise the "rim". This paragraph suggests we are happy and, indeed, expecting the University to expand in future years. The wording "most purpose-built student accommodation.....built on the campus", should be targeting all accommodation no more in Falmouth.</p> <p>I believe the Neighbourhood Plan should conspicuously put residents first and there should be greater emphasis on housing and rental opportunities for local people. The Quarry Car Park, if allocated for housing, should be for local people to help many afford to live in their own town. Should we not be encouraging accommodation built on campus to be used for those living in HMOs in the town, not for use of the University's expansion?</p> <p>I believe the Neighbourhood Plan in its draft form, is putting too much emphasis on facilitating the accommodation needs of the University.</p> <p><b>Page 33 - PolicyHM03 - new build student accommodation</b></p> <p>It is located...</p> <p>(a) on site close to the town centre..... Are we missing the point that many disabled people or those unable to walk long distances would love to live nearer the town. I was under the impression that student accommodation would be acceptable on the campus, why are we now encouraging utilisation of the town to build blocks. We are a Tourist area, and if we are to accept media predictions, this is a growing industry. I am aware that the Neighbourhood Plan is to be amended, to encompass a greater narrative regarding our tourist industry. This is of great important economic benefit to this area, but we can see, sadly, the decline of our hotels and B &amp; Bs. Looking to the future, it is important to retain this industry and I am therefore unhappy that the Ocean Bowl site is still being put forward as a possible future site for housing/<b>Students</b>. I believed it had been established that any such development on this site would be detrimental to, not only the surrounding residents, but the future expansion of A&amp;P. I am therefore very surprise this is still included. I would like to see any future use of the site, should this be appropriate, to be designated for an indoor sporting venue. We have lost the ocean bowl, to the disadvantage of not only tourists, but our local population. We are sadly lacking such facilities.</p>		

Comment Received	LNDP Meets expectations	Reference Look-Up
<p><b>Page 54 Policy</b></p> <p>I am very concerned with regard to the text regarding Falmouth Hospital "<b>Enabling development may include:</b></p> <ul style="list-style-type: none"> <li>• <b>Workshop, business and retain space for health-related activities</b></li> <li>• <b>Residential development, including key sector worker housing</b></li> <li>• <b>Extra care housing (public or private)</b></li> <li>• <b>Fitness facilities</b></li> </ul> <p>Falmouth has been reported in the media as being the town with the highest population in Cornwall, overtaking St Austell. As such I believe policy should be to retain this building as a hospital and its existing facilities. Staff are due to return in March and I believe the people of Falmouth would be hostile to any other use. Views have already been expressed as to change of use not being accepted.</p>		
<p>Real pavement width for push wheelchairs and child pushchairs - a pavement distinct from road in Main Street which is the legal pavement - remove bollards - they block wheelchairs are hazardous to blind. Ban sandwich boards on town pavements.</p> <p>Note all carers have an eternal passenger for example disabled child, dementia sufferer. Parking in town is vital this can be ordinarily parking spaces but need boot or side space for wheelchair. Disabled visitors seek wheelchair friendly towns to spend their money in.</p>	Yes	C48
<p>Support</p>	Yes	C49
<ol style="list-style-type: none"> <li>1. More explicit focus on housing mix especially real affordable homes</li> <li>2. Small student developments only more provision of small boat moorings across the whole harbour</li> <li>3. No to the size of development at Cliff Road</li> <li>4. Develop more opportunities for craft stalls on open areas of land - some covered some open - to explicitly support local craft persons</li> <li>5. More open liaison between the Universities and Falmouth community</li> <li>6. The Moor needs a makeover - too empty and open</li> </ol>	Yes	

Comment Received	LNDP Meets expectations	Reference Look-Up
7. Clear road closure times for main street so delivery only early and late Good work - crack on.		
<p>That no further developments or 'taming' of the area around Pendennis as a whole should be contemplated including the possible luxury flats development just beyond the docks (so far rejected). Buyers would complain about the sewage works and the noise and smells from the dock, contractors would need access and ruin the peace of the whole area (one way system)</p> <p>I know parking is being looked at but last year the Divers car park (Pendennis once again) was full of overnight camper vans and possibly Pendennis Point car park) well into October and November. If you ignore this problem it will get worse as word will get around that Falmouth is a soft touch bye laws can be made and the erection of signs to make overnight camping illegal. It is also becoming a problem along Cliff Road. They have to put their toilet and washing waste somewhere and their rubbish this is a health hazard and they contribute nothing. Presently there is a large white van permanently parked at the Divers car park it is been there for months without being moved on: why not?</p> <p>The public's views on the town centre sound very interesting but how will developing the quarry and Church Street car parks help the parking? I confess I have only read the summary leaflets and the aims are commendable but the last paragraph on page one says it all: Falmouth has always been slow in coming forward and Truro has not hence Truro is now the place to shop I am a Falmouthian - I love where I live. I welcomed students when they started their study here - a breath of fresh air, but now need I say more? Good luck with the plans and thank you for your efforts.</p>	Yes	C50
<p>Residents parking scheme. We do not believe there is any evidence base to support this. Judging by the residents parking scheme open day no public support either. If the University took more responsibility to provide long-term parking for those students requiring to bring a car, issues in areas with a high density of HMO's would disappear.</p> <p>P31. Policy HMO1 whilst we fully support this policy will the local authority introduce additional HMO licensing of other types of HMO which are not subject to mandatory licensing(eg two storey).</p> <p>P34. Section 6 The town centre. We fully support the proposal is for the town centre strategy and look forward to the enforcement of the traffic regulation order.</p> <p>Excellent draft plan, Sadly letdown by online comments form.</p>	Yes	C51

Comment Received	LNDP Meets expectations	Reference Look-Up
<p>It is upsetting to see that the solution to dealing with students living in Falmouth seems to be housing the majority of them within an area of 500 m around my house. How is that solving the issue and why is this acceptable? We have /will have the student developments at the Falmouth Docks station, Ocean bowl site and TA site plus numerous other HMO on our road. Parking is a serious issue where we live on Bar Road and reducing car park spaces will have a very detrimental effect on the area. If the TA site is to be developed it should be to provide affordable or social family accommodation. Why should families be placed out of the town and students given priority in the town? We desperately need affordable family homes in town with priority given to local families.</p>	No	C52
<p>I am concerned that you are not fully recognising the environmental and ecological value of the quarry car park (part of which you have ear marked for student housing). This is a major urban open space which should also be recognised in FOS1 one for its outstanding landscape and biodiversity value. The biodiversity must be protected from development and its unique qualities retained for future generations of flora, fauna and humans to enjoy. Please also note that during the summer months and other holiday periods and on special events this car park is a very well used. Where would the vehicles displaced by development be accommodated in Falmouth?</p> <p>Over the next 30 years and in the context of climate change and the need to reduce carbon emissions there needs to be much greater emphasis on how this is to be achieved i.e. by working towards a low carbon and circular economy.</p> <ol style="list-style-type: none"> <li>1. Sustainable transport: need to acknowledge the inevitable and welcome move towards electric vehicles (and encourage this by introducing more charging points in public areas).</li> <li>2. Health and well-being: healthy eating. Greater access to locally Cornish produced food; adequate provision of allotment sites; retaining adequate agricultural land to help meet future needs of local population.</li> <li>3. Renewable energy: more local community energy projects(solar and Marine and wind): plan for anaerobic digester provision for Falmouth network area.</li> <li>4. Construction: ensuring that all new build conforms to the highest possible environmental standards. Carbon neutral.</li> <li>5. Waste and resources: applying the principles of the circular economy to waste materials: through increased reuse and recycling and working with the University on redesign projects. Do you know what the household and commercial recycling rates are for Falmouth? N.b. Recycling is far more carbon efficient than products from raw materials and saves on valuable natural resources.</li> </ol>	Yes and No	C53

**Appendix D: Pre-submission consultation (Regulation 14) Consultee Comments and Reference Look-Up: Developers/Land Owners and Reference Look-Up**

Comment Received	Reference Look-Up
<p><b>Studios Ltd</b>  <b>Foreword, Page 3</b> - Studios agree with the aim to work together as a community to ‘provide housing that meets local needs and provides greater choice of tenure and mix’. This aim is supported as it is important to provide a choice of housing tenure and mix of various rental scales to accommodate the diverse needs of the housing market.</p> <p><b>Section 4: Vision for Falmouth (page 13 – 15) -</b>            There is support for the ‘Vision’ of Falmouth as it is important to ensure Falmouth grows and becomes a ‘distinctive, vibrant, resilient, inclusive and well- balanced attractive sea-port’. Purpose built private student accommodation, such as the former Rosslyn Hotel site can aid in the delivery of this vision.</p> <p>It is agreed that the golden thread of the ‘presumption in favour of sustainable development’ that comes directly from the National Planning Policy Framework is carried though into the Falmouth Neighbourhood Plan (NP). Support should be given to developments that are sustainably located, situated on brownfield land and meet identified needs, such as purpose built student housing.</p>	<p><b>D1.</b></p>

Comment Received	Reference Look-Up
<p><b>Section 4a Social: Ensuring a Strong, Healthy and Just Society'</b> - This section notes that the NP 'sets out a framework, guidance, and policies to ensure that this growth creates sustainable communities that have the necessary infrastructure, facilities and connection to make them good places to live in'. Studios agrees with this statement in general, although the plan should provide flexibility for sites not allocated / identified within the plan system to come forward for development if a set of identified criteria can be met, particularly when sites are realistic and deliverable, with a land owner willing to develop and deliver a scheme in line with current demand, such as the former Rosslyn Hotel where Studios is actively pursuing a planning permission for student accommodation (ref. PA/16/03586) which could be built and delivered in a short space of time to meet current identified need.</p> <p><b>Section 4b Economic : Achieving a Sustainable Economy</b> - This section supports the 'careful expansion of the Universities' – Studios agree with this statement, provided there is the appropriate support of student facilities and accommodation aligned to this growth.</p> <p><b>Section 5 Housing and Regeneration (Pages 22 -33)</b></p> <p><b>Urban capacity / infill housing and regeneration - Page 25, Figure 25</b> - Studios are pleased to see, and support the Falmouth NP allocation of the Rosslyn Hotel (Site C.23) as a new build housing site. We also agree with the statements in the supporting text that state these sites can provide 'additional housing development' to 'optimise the number of new dwellings created', also that the sites are those 'having the best potential for sustainable development should they become available for development or regeneration'.</p> <p>However, it is challenged that if a site is identified as suitable for housing development, in a sustainable location and for the aforementioned reasons – why is the Rosslyn Site not also considered suitable for student accommodation? If the site is allocated and identified as suitable for housing development, then one would expect the site to be suitable for student accommodation as well. In fact, sites such as the Rosslyn, could achieve a better optimisation of the number of units provided on site should student accommodation also be identified as suitable.</p> <p>It should also be noted that the Rosslyn site is currently available and a planning application is actively being pursued on the site for student accommodation, where as some of the sites identified within Figure 25 are not deliverable at this current point in time.</p>	



Comment Received	Reference Look-Up
<p>The Ocean Bowl scheme has recently been refused planning permission for a number of reasons, one being that the site is more suited to economic development, however, it remains within the plan as an identified student accommodation site. Therefore, there is the need to identify additional sites to make up this short fall.</p> <p>It is proposed that the Rosslyn Hotel site should be allocated as a site suitable for delivering student accommodation or housing and make up part of this shortfall.</p> <p>The allocation of the Rosslyn for student accommodation (as well as housing) would also assist in the delivery of the Key Objectives listed under the 'Accommodating Students' section of the plan to 'optimize the availability of private rented accommodation to meet the housing needs of all Falmouth's residents'. Although, the current intention is to provide student accommodation on the site, Studios also support the identification of the site for residential development, although it is intended that the site will solely be used for private student accommodation.</p> <p><b>Accommodating Students – Page 28 -33</b> - The principles set out within this section are broadly supported, particularly the drive to limit the number of HMO's within Falmouth. It is for this reason that Studios promote the development of well placed, well managed purpose built student accommodation. Purpose built student accommodation reduces the negative aspects associated with student living, such as the poor care and maintenance of buildings, poor storage of refuse, poor care of gardens and communal areas – these effects are reduced as these aspects are under the management of the company running the accommodation rather than the responsibility of the students. It is therefore felt that the Rosslyn Hotel site could assist in providing appropriate, well managed student accommodation.</p> <p>Studios agree with the statement that 'purpose built student accommodation schemes need to come on stream quickly' to reduce the impact of unmet housing demand from students effecting the local private rented housing market. This is particularly true in relation to the imminent increase in the number of students should the cap on student numbers be agreed. Although Studios agree with the 'three-pronged approach' proposed by both the Falmouth NP and the Local Plan that there should be an introduction of Article 4 Directions; the accommodation provision should be linked to the phased increase in student numbers and sites should be identified through the plan process to accommodate this growth. Studios do not agree that there should be no scope for additional accommodation to be provided</p>	

Comment Received	Reference Look-Up
<p>on non-allocated well located sustainable sites. Therefore, this approach should contain wording which allows for such sites to come forward.</p> <p>Further to this and a more general comment to the approach taken by the Falmouth NP, is that the plan focuses heavily on the provision of student accommodation being on-campus or within close proximity to the Penryn Campus. Consideration should also be given to the fact there is a university campus within Falmouth itself, therefore the appropriate accommodation needs to be provided for the students attending the town centre campus as well as the Penryn campus – this would be in the form of accommodation within easy reach of both the campus and town centre. It should also be considered that not all students based at the Penryn Campus wish to live on this location, many wish to be located within the town where there is a greater variety of shops and entertainment. Therefore the NP needs to be broader in its consideration of student accommodation, both in its location and variety of accommodation types.</p> <p>In addition to this, Studios are of the view that the Neighbourhood Plan should also provide the opportunity for students to live ‘off campus’ rather than encourage students to live on site; there should be the ability for non-identified sites, off campus, that are well placed and sustainable to provide student accommodation and provide freedom of choice in the accommodation market as not all students wish to live on campus.</p> <p><b>Policy HM01 and HM02</b> - This policy which resists the conversion of properties to HMO’s is supported by Studios so that private housing can remain in the non-student accommodation sector, whether it be private rental or ownership.</p> <p><b>Policy HMO3</b> - Studios are pleased that Part 1 of this policy does not restrict the provision of new build student accommodation to either on campus development or to sites identified within the Cornwall Local Plan Site Allocations Development Plan. It is also agreed that Part 1a of the policy only permits sites along sustainable transport corridors where the university facilities can be reached by walking, cycling or via bus routes.</p> <p>HMO3 Part 2 and 5 are supported for the promotion of good quality, well designed new build student accommodation that does not have an unacceptable impact on neighbours, and provides for the safety and security of the occupants and local residents. It is also agreed that new built student accommodation should be occupied solely by students. Schemes such as the Rosslyn Hotel are well placed to provide</p>	

Comment Received	Reference Look-Up
<p>such accommodation, particularly where a high level of working alongside the Council has taken place to provide an acceptable scheme of both design and scale and one that has been assessed by the Design Review Panel.</p> <p>Parts 3, 4 and 6 of the Policy may be well intentioned but are not practicable or founded with thought that these facilities are commercially funded. Most privately provided student accommodation, as well as on campus accommodation, is managed on a 24hr basis, using an employed student representative. This system is a proven model used by numerous providers of student accommodation across the Country, therefore the need for 24hr / seven days a week managed presence that does not use students and the funding of 'street angels' is not necessary or practicable. How is it that these things would be coordinated and managed between the various providers?</p> <p>Finally, the requirement for private accommodation of 10 or more flats to provide a financial contribution towards delivering affordable housing elsewhere in Falmouth is excessive. This is seen as unnecessary, primarily because if there is a sufficient supply of appropriate purpose built private and on-campus student accommodation within Falmouth, there would not be the need for students to use HMO's, thus freeing up the housing market and supply of housing for local residents.</p>	
<p><b><u>Amethyst Planning Ltd</u></b>  (1) Background  These comments specifically relate to the former oil storage site at Castle Drive (ref D38 / D39). The site is redundant, contaminated, brownfield and in a sustainable location. A sensitive scheme can be readily be brought forward that removes contamination, regenerates the site, delivers new housing of an appropriate design and enhances the setting of the Scheduled Ancient Monument. The blanket objection to any development on the site will only serve to ensure that it presents a long term contamination risk and does not deliver any of the potential benefits associated with a sensitive redevelopment scheme. The site presents an ongoing contamination risk and this can only be remediated via funding from a residential redevelopment of the site.</p> <p>Figure 21  The site should be deleted as a protected site.</p> <p>Figure 25</p>	<p><b>D2</b></p>

Comment Received	Reference Look-Up
<p>As set out above the site should be included as a potential residential development site in the schedule and therefore also within the remit of HR6. A residential development of the site is necessary to deliver the remediation and environmental enhancements.</p> <p>Chapter 8 - Environment and Open Space The redevelopment of the site as proposed in the recent application will deliver significant environmental benefits for Pendennis and Falmouth as a whole and will also make financial contributions that can be used towards the Pendennis Point enhancements. In order to achieve this a residential development of the site is necessary.</p> <p>Policy DG4 The draft policy can be applied to prevent any development that causes harm to heritage assets.</p> <p>Page 59 Delivery It is noted that the only way to deliver the remediation and enhancement of the Castle Drive site is via the proposed residential redevelopment.</p> <p>The site should be allocated as a residential development site and deleted from Figure 21 protected sites and associated policy.</p> <p>Policy DG4 should be amended to reflect the requirements of the Framework.</p> <p>(2) Background These comments specifically relate to the former oil storage site at Middlepoint (ref D36). The site is redundant, contaminated, brownfield and in a sustainable location. It is not of any operational benefit to the future use of the docks. The site presents an ongoing significant contamination risk and this can only be remediated via funding from a residential redevelopment of the site.</p> <p>A recent application for 35 units was refused despite having the full support of Falmouth Town Council. This scheme would deliver significant benefit and we would be pleased to discuss the site in further detail in working up the Neighbourhood Plan.</p>	

Comment Received	Reference Look-Up
<p>Housing Requirement page 22 It should be noted that the quoted residual target of 686 units should be accurately presented as a minimum housing requirement in accordance with the Local Plan.</p> <p>Figure 25 As set out above the site should be included as a potential residential development site in the schedule and therefore also within the remit of HR6. A residential development of the site is necessary to deliver the remediation and environmental enhancements.</p> <p>Chapter 7 The subject site is identified in the Site Allocations DPD as part of the docks area. The site is redundant and of no future use to the operation of the docks. The site is also physically divorced from the docks and should be deleted from the docks employment area.</p> <p>Chapter 8 - Environment and Open Space The redevelopment of the site as proposed in the recent application will deliver significant environmental benefits for Pendennis and Falmouth as a whole and will also make financial contributions that can be used towards the Pendennis Point enhancements. In order to achieve this a residential development of the site is necessary.</p> <p>Policy DG4 The draft policy can be applied to prevent any development that causes harm to heritage assets.</p> <p>Page 59 Delivery It is noted that the only way to deliver the remediation and enhancement of the Middlepoint site is via the proposed residential redevelopment.</p> <p>Identification of the site as a suitable site for housing development and environmental enhancements,</p> <p>Amend Policy DG4 to reflect paragraph 134 of the Framework</p>	

Comment Received	Reference Look-Up
<p><b><u>One Red Ltd</u></b>  <b><i>Land at the Former Four Winds Inn and Garage/Depot, Dracaena Avenue, Falmouth, TR11 2EQ</i></b></p> <p><b>1.0 Introduction:</b></p> <p>1.1 Neame Sutton Limited, Chartered Town Planners, is instructed by One Red Ltd to submit representations in respect of the Falmouth Neighbourhood Development Plan, Pre-Submission first draft version (December 2016).</p> <p>1.2 These representations relate to land at the former Four Winds Inn and Garage site located of Dracaena Avenue, Falmouth and follows an application made to Cornwall Council (Ref PA16/09195), for a scheme of purpose built student accommodation comprising 153 bedspaces, and ancillary services.</p> <p>1.3 It is evident from the emerging Neighbourhood Plan and its evidence base that the success of the towns Universities in recent years, which has seen a significant increase in the student population, coupled with the lack of purpose built student housing within Falmouth, has caused significant issues for the local community, and which the Neighbourhood Plan seeks to address.</p> <p>1.4 Whilst the presence of a large student community makes a valuable contribution to the social vibrancy and local economy of the town, at the same time it places a corresponding demand for student accommodation, the majority of which has to date been met by the private rented sector with the provision of purpose built student accommodation not keeping up with rising demand.</p> <p>1.5 The result of this is that many students have no option available other than to seek accommodation in the private rented and HMO sectors which is placing additional pressure on these markets and giving rise to concerns about the “studentification” of areas.</p> <p>1.6 The under supply of purpose built student accommodation puts pressure on the city’s private rented market and can result in imbalanced communities with an over concentration of students and high numbers of shared housing.</p> <p><b>2.0 Representations to emerging Falmouth Neighbourhood Plan:</b></p> <p>2.1 Falmouth Town Council is to be commended for taking a proactive role in responding to the local communities concerns by the preparation of a Neighbourhood Plan that is generally supportive of new purpose built student accommodation schemes, whilst also securing the introduction of an Article 4 Direction to limit the further proliferation of HMOs in the town.</p> <p>2.2 Whilst generally supportive of the principles and objectives of the emerging Neighbourhood Plan, One Red Ltd has a number of observations/comments, as follows:</p> <p><i>(i) Policy HM03: new Build Student Accommodation</i></p>	<p><b>D3</b></p>

Comment Received	Reference Look-Up
<p>2.3 The Falmouth Neighbourhood Plan takes a flexible and positive approach to the provision of purpose built student accommodation, which is fully supported and encouraged.</p> <p>2.4 In particular, the Town Council's observations that the emerging Cornwall Local Plan's strategy for the identification and development of purpose built student accommodation needs to be realistic and deliverable in a timescale that is responsive to market pressures. This is of fundamental importance to the success of seeking to redress balanced communities and the Town Council are right to reinforce it within their community's Neighbourhood Plan.</p> <p>2.5 Emerging Policy HM03 states that purpose built student accommodation will be permitted if a number of criteria are met, including sites that are located:</p> <p><b>Criterion 1:</b></p> <p><b>a) on sites close to the town centre and along sustainable transport corridors easily accessible to the university campuses or other educations establishments by walking, cycling, rail services and existing or proposed bus routes; or</b></p> <p><b>b) on sites identified within the Cornwall Local Plan Site Allocations DPD and</b></p> <p><b>c) where it will not exacerbate any existing excessive concentration of student accommodation.</b></p> <p>2.6 As currently drafted, this Policy is interpreted to mean that provided sites do not exacerbate any existing excessive concentration of student accommodation, then proposals for student accommodation can come forward either as sites allocated in the emerging Cornwall Local Plan or as sites that are close to the town centre and along sustainable transport corridors easily accessible to the university campuses, and therefore sites that are not specifically allocated under the Cornwall Local Plan can also come forward and be considered favourably, subject to meeting those criteria.</p> <p>2.7 This is particularly important given the relatively recent refusal of planning permission for purpose built student accommodation at one of the proposed allocated sites (Ocean Bowl) within the emerging Local Plan.</p> <p>2.8 As currently drafted, Policy HM03 offers sufficient flexibility to enable good quality managed student accommodation to come forward in highly accessible locations, such as at the former Four Winds Inn and Garage/Depot site.</p> <p>2.9 This principle is now firmly recognised within the Cornwall Local Plan by the Inspector's proposed modification (main modification no. 44), which will add the following paragraph:</p>	

Comment Received	Reference Look-Up
<p><i>"In order to help redress this imbalance and provide for existing and future need, the provision of specialised student accommodation in appropriate and sustainable locations, in addition to meeting the needs of the local resident population, will be supported. In Falmouth and Penryn towns, and</i></p> <p><i>Mabe in particular, whilst there are limited opportunities every effort should be made to deliver good quality, managed accommodation within the towns and in locations close to the university. Such provision will help to reduce the reliance on existing housing stock in the community for use by students."</i></p> <p>2.10 Criterion 1 is therefore supported.</p> <p><b>Criterion 2: The design:</b></p> <p><b>a) shows respect for existing street patterns, form, scale and massing; and</b></p> <p><b>b) would not have an unacceptable impact on neighbouring residential amenities through reduced levels of daylight, sunlight, outlook or privacy; and</b></p> <p><b>c) ensures that servicing and parking requirements can be achieved without impacting unacceptably on the residential amenities of neighbouring residents; and</b></p> <p><b>d) provides for the safety and security of occupants whilst respecting local character and permeability of the area via footpaths, cycleways, opes and traditional routes."</b></p> <p>2.11 This criterion deals with development control matters relating to amenity, scale, mass, parking requirements etc. and as such comprise the usual planning considerations, and as such One Red Ltd raises no objection.</p> <p><b>Criterion 3:</b></p> <p><b>Twenty-four/seven-day week on site management presence is provided.</b></p> <p>2.12 Whilst One Red Ltd has no objection to the imposition of this criterion, it is important to acknowledge that a requirement for 24/7 on site management may for smaller schemes not be feasible or viable.</p> <p>2.13 That said, One Red Ltd's proposal at Dracaena Avenue for 153 bedspaces includes a wardens flat and management office, and as such offers 24/7 on site welfare and management. This ensures that any issues requiring immediate attention are dealt with whilst at the same time providing a direct link for local residents, should there be a need to raise any issues, including out of hours.</p> <p><b>Criterion 4:</b></p> <p><b>On sites accommodating more than 199 students, contributions to fund off-site policing/street angels will be provided;</b></p> <p>2.14 One Red Ltd consider that this criterion is neither necessary to make the development acceptable in planning terms or reasonable.</p>	



Comment Received	Reference Look-Up
<p>2.15 Firstly, One Red Ltd.'s proposal seeks to meet the current unmet demands of students who already currently reside in the town in HMOs where there are no such controls. Planning applications should not therefore be used to resolve pre-existing deficiencies.</p> <p>2.16 Secondly, the provision of purpose built student accommodation with 24/7 on site management offers a managed environment and thus offers a degree of control over student behaviour, in comparison with HMO's where there is currently no such controls.</p> <p><b>Criterion 5:</b>  <b>The development is occupied solely as student accommodation (including on-site management staff accommodation);</b></p> <p>2.17 One Red Ltd raises no objection to this criterion.</p> <p><b>Criterion 6:</b>  <b>For developments that include 10 or more flats a financial contribution is secured towards delivering affordable housing for rent elsewhere in Falmouth.</b></p> <p>2.18 One Red Ltd objects to the inclusion of this criterion. Firstly, this is likely to significantly impact the viability of student accommodation schemes and thus impact upon their delivery. Furthermore, it is considered that student accommodation is a form of affordable housing and helps to maintain balanced communities.</p> <p>2.19 In addition, the provision of purpose built student accommodation frees up family housing within the town. One Red Ltd's proposals are expected to free up between 30-50 family homes and return them back to the family housing market within Falmouth.</p> <p><i>(ii) The Council's assessment of sites for development potential</i></p> <p>2.20 Following a review of sites within and around Falmouth, the Town Council's Strategy and Housing Working Group assessed 40 sites which could be considered to offer development potential, and included the former Four Winds pub (site reference C19) and the former depot (site reference C20), both of which are under the control of One Red Ltd and the subject of an undetermined planning application.</p> <p>2.21 Of the 40 sites assessed, 5 were discounted as being valuable assets (open space) worthy of protection from development, 20 sites were considered to offer development possibilities with the remaining 15 sites identified as those suitable to develop.</p> <p>2.22 Both the former Four Winds pub (C19) and garage/depot (C20) were considered to offer development potential and identified as "sites suitable to develop" and colour coded green on the Strategy Map: Development Possibilities. One Red Ltd supports this view and considers it to be reflective of the fact that the site occupies a highly sustainable location within the defined urban area of Falmouth in accordance with the presumption in favour of sustainable development.</p> <p>2.23 The individual site assessment for C19 and C20 suggests that the site could be redeveloped for housing or a hotel.</p>	

Comment Received	Reference Look-Up
<p>2.24 Whilst One Red Ltd has no in principle objection to the sites identification to accommodate housing or a hotel, it queries why the Town Council has not considered the opportunity for the site to accommodate purpose built student accommodation, as it has done on 5 other sites (A2: Vospers/Sainsburys), B8: Quarry, B12: TA Centre Car Park, C30: Dell Garage backlands, and C34: Ocean Bowl), or if it has, what criteria was used to make such judgements.</p> <p>2.25 As currently drafted, it is difficult therefore to properly understand the reasoning, or if in fact the site was considered for student accommodation.</p> <p>2.26 The site occupies a highly sustainable and accessible location being situated on a major public transport route into the town, close to the main line railway, University of Falmouth campus and town centre. The suitability of the site to accommodate purpose built student housing is set below.</p> <p><i>(iii) The Council's preferred sites for student accommodation</i></p> <p>2.27 The Town Council assert on page 31 (fourth paragraph) that <i>"It is the preference of this Neighbourhood Plan that most purpose built student accommodation should be provided by onsite provision and expansion of the existing campus, at the Quarry Car Park in Falmouth, and within the suggested Ashfield sustainable neighbourhood."</i></p> <p>2.28 However, this is not supported by the individual site assessments, which demonstrate that there are additional sites which the Town Council considered to represent suitable sites for potential student accommodation schemes.</p> <p>2.29 Furthermore, given that the Neighbourhood Plan does not propose to specifically allocate sites for purpose built student accommodation, instead favouring a more flexibly drafted Policy that encourages new build student accommodation in accordance with a number of criteria, the Council's assertion as to its preferred sites should either be qualified or deleted.</p> <p>2.30 As currently drafted, and in the absence of any reasoned justification, the assertion is confusing and at odds with the Plans evidence base.</p> <p><b>3.0 The suitability of the former Four Winds pub and Garage/Depot site to accommodate purpose built student accommodation:</b></p> <p>3.1 One Red Ltd supports and welcomes the identification of its site as suitable to meet the future development of Falmouth, and in particular considers it is not only suitable for purpose built student accommodation but also available and achievable, as follows: Suitable:</p> <ul style="list-style-type: none"> <li>• The site comprises an under-utilised brownfield site within the heart of the defined urban area of Falmouth, and therefore accords with the Framework in relation to the overarching presumption in favour of sustainable development set out at Paragraph 14.</li> </ul>	

Comment Received	Reference Look-Up
<ul style="list-style-type: none"> <li>• The site occupies a highly sustainable and accessible location to support the sites redevelopment for student accommodation. In particular, the local highway network provides a range of pedestrian provision in the vicinity of the site, providing links towards Falmouth town centre, the railway station, and Falmouth University’s Falmouth campus which runs free shuttle buses up to the Penryn campus. The nearest University bus stops are approx. 300m south of the site whilst Penmere railway station is located approximately 1km (12 to 15 minutes walk) to the south east of the site.</li> <li>• The Applicant ‘s multi-disciplinary project team has in formulating the application proposals for the site, undertaken a series of technical studies to ensure that there are no overriding technical constraints to prevent the site from being redeveloped for purpose built student accommodation.</li> <li>• The site accommodates a fairly utilitarian industrial building and public house and occupies a prominent location on one of the principal transport routes into the town. The redevelopment of a vacant underused site by award winning Architects, Architecture PLB, achieves a high quality environment that exhibits all of the characteristics of good urban design, and overall makes a valuable contribution to the public realm. In formulating their plans for the site, One Red Ltd presented their scheme to the Cornwall Design Review Panel who, in their consultation response, supported the design approach concluding that <i>“the form and massing are a good response to the character and constraints of the site”</i> and that <i>“the potential issue of over- looking/inter-visibility with the existing housing to the rear seems to have been successfully avoided”</i>. Overall, the Design Panel were happy to support the general design of the project.</li> <li>• The capital investment of a student accommodation proposal provides a major economic boost to the local economy and has the potential to engage a considerable amount of employees during the construction phase, in addition to those indirect jobs resulting from the trade linkages in supplying construction material and equipment and the future ongoing servicing of the buildings. With regard to the operational requirements of the student accommodation, the scheme will generate the need for management/security/cleaning staff as-well as the student warden and will therefore create a number of jobs.</li> <li>• As a major stakeholder in the town, and end user of the proposed asset, One Red Ltd consulted with the University, who without prejudice, have been generally supportive of the proposal to deliver purpose built student accommodation in this location.</li> </ul> <p>Available:</p> <p>3.2 One Red Ltd are the promoters and developers of land at the former Four Winds Inn and Garage/Depot site and are committed to delivering a high quality, managed purpose built student accommodation scheme that responds to the local community’s aspirations to see the significant number of HMOs returned to family housing.</p> <p>Achievable:</p>	

Comment Received	Reference Look-Up
<p>3.3 One Red Ltd is keen to progress its proposals and have submitted a full detailed planning application, having met and carefully considered local stakeholders opinion in its' design to Cornwall Council which, seeks to deliver the Neighbourhood Plan's objective by providing 153 additional bedspaces of much needed purpose built student accommodation to meet an immediate unmet need on sites in accessible and sustainable locations and which do not lead to further concentration of students.</p> <p>3.4 In the event that planning permission is granted, One Red Ltd are looking to deliver the scheme for the start of the academic year September 2018.</p> <p><b>4.0 Conclusion:</b></p> <p>4.1 Subject to those observations/comments set out within these representations, One Red Ltd supports the Neighbourhood Plan and considers that it reflects the collective vision of the town such that it is capable of a majority win at referendum.</p>	
<p><b><u>Maenporth Estate</u></b></p> <p>Maenporth Estate own the café on Maenporth Beach and have a long term arrangement with Cornwall Council to maintain the beach. At the moment this part of the Boslowick Ward does not come within the plan area.</p> <p>It could be helpful if the remaining part of the Boslowick Ward was included. We are considering possible long term improvements to the cafe and surrounding area and would welcome input from the local community.</p>	D4
<p><b><u>Lewis Houghton Wills Ltd</u></b></p> <p>1) How will Article 4 affect properties that historically are holiday let or owner occupied through the summer and then student let 10 months of the year?</p> <p>2) How will Article 4 affect a property that has a HMO licence but is used for holiday let / owner occupied during the summer months but student let for 10 months.</p> <p>3) How long can a property with existing HMO use be left empty for renovation works etc before reverting if at all to C3 use.</p> <p>4) The control of HMO's using Article 4 will affect available accommodation for non-students and local companies that rent small HMO's. There are a number of local companies that rent small HMO to house their workers and also groups of professional workers that rent a</p>	D5

Comment Received	Reference Look-Up
<p>house together as a way of affording local housing or saving fro deposits etc. The restriction could have an effect on local businesses and could lead to an increase in 'sofa surfing' and in some extreme cases rough sleeping. How will the planning policy meet the needs of these groups of people?</p> <p>5) Are the local residents/homeowners aware of the likely impact Article 4 may have on residential house prices, especially in heavily populated student areas. Some Article 4 cities have reported a 20% decrease in residential property prices.</p> <p>6) How long can a property be empty i.e: for refurbishment where existing established HMO use already exists before it would not count as a C4.</p> <p>7) How will the Council/Town monitor unlicensed/smaller HMO's?</p>	
<p><b><u>Link Ltd</u></b>  I have a property on Erisey Terrace which currently has an HMO licence and is let to students during the winter months. In the summer we let the property to tourists and use it for family/friend holidays.</p> <p>If I keep to the above will I need to submit a planning application and reapply for an HMO licence at the end of each summer period?</p>	<p><b>D6</b></p>

**Appendix E Comments by Cornwall Council Officers and Reference Look-Up**

Comment Received	Reference Look-Up
<p><b>Falmouth NDP – CC pre-submission consultation response</b></p> <p>Below are the comments from officers from different services within the council, who have responded to an internal consultation that we carry out when you notify us of your pre-submission consultation. Officers will provide comments relating to their area of expertise and I have included their comments in full at this stage, as there is scope for you to make revisions to the plan before submitting to Cornwall council if you wish.</p> <p>I would point out the difference between comments about the NDP not being in general conformity with higher level strategic policies and other recommendations which are made with a view to strengthening the plan’s position on certain issues. The former listed in the first section below; they are important to resolve, because they will be raised again at Examination and ‘general conformity’ is a Basic Condition which must be met at Examination. Other recommendations are for your consideration.</p> <p><b>Conformity/Legal compliance Issues:</b></p> <p><b>Area designation</b></p> <p>There is an error in the area designation map, so that part of Penryn Parish is included in the NDP area designation. This is a procedural issue, but means that the plan is not legally compliant and could not proceed if submitted. There is no formal procedure for changing or correcting an area designation so you can either submit a request and a map showing the whole parish boundary – in which case area designation is automatic and can be issued immediately. If you wish to continue to exclude the Maenporth area of the parish, we will have to consult for 6 weeks before designating, so this should be done as quickly as possible, so that it does not delay you in submitting the plan. In the initial area designation application, the boundary shown followed the road at eg Bickland Water – whereas the actual boundary extends slightly beyond this.</p> <p><b>Urban extension sites</b></p> <p>The plan tries to influence areas of land outside the boundary of the designated area. I understand the benefits of planning in context and the desire of the group to influence the urban extensions, but this cannot be included in the NDP. I see that this has been worded as ‘Policy Proposal’ rather than as a policy, but the responses from statutory consultees show that they are confused by this. The ‘policy proposals’ should be submitted as comments to the Site Allocations DPD consultation – the NDP can have text about creating sustainable communities, but not policy proposals.</p>	<p><b>D1.</b></p>

Comment Received	Reference Look-Up
<p>It is suggested that your current ‘policy proposals’ are better suited to a broader ‘development approach to securing sustainable communities’ approach to developments in and around the NDP area of the town. Such an approach would set out the key criteria / issues / approaches that you are currently expressing with the overarching aim of creating sustainable communities. The DPD is attempting to do that through its policy wording for specific allocations (outside of the NDP), and it is felt that the NDP could reinforce these requirements for new development proposals within the designated area.</p> <p><b>Urban capacity/ infill housing and regeneration</b></p> <p>There is a list of sites on page 25 of the plan, the policy justification states that these sites can provide up to 240 dwellings. Although the policy intention says that it is not the intention of the neighbourhood plan to allocate these site or identify site specific policy for them, a policy is included (Policy 6: Urban Capacity /infill sites) and Policy 7 controls the design of these sites. The wording is such that it has caused statutory consultees - Historic England (HE) and Natural England (NE) to judge that the plan requires Strategic Environmental Assessment (Please see also comments from David Stuart, HE). This could be resolved either by providing the fuller assessment of historic environment impacts as suggested by David Stuart, or by having a general policy about support of infill and brownfield development and moving the list of sites to supporting evidence.</p> <p>If you were to pursue the list of urban capacity sites as an appendix to the main document, you could in your main document make reference to the list of urban capacity sites that provide some key opportunities to focus new development on urban brownfield site for a range of uses including, housing; affordable housing; employment, small scale retail in support of the town centre area and also include mixed use development potential on larger or more complex sites. You can then list your urban sites, perhaps including a summary of your assessment of the site, and any issues that might make a site more, or less complex etc such as heritage, contamination, landscape, access etc etc. You might choose to include the Quarry and the maritime car park sites within that urban capacity opportunity section of an appendix to the main document, having set out what makes them more complex within your appendix section.</p> <p>Beyond carrying out the SEA work and specifically allocating any key urban sites, this is likely to be the only remaining option to get something in the document about these sites.</p>	

Comment Received	Reference Look-Up
<p><b>Dredging</b> The NDP cannot have a policy on dredging as this is outside the remit of the plan. I have queried with NE whether support for dredging in a statement in the supporting text would also trigger the requirement for (Habitats Regulation Assessment) HRA and await their response.</p> <p>You might want to refer to the land based projects associated with the port masterplan, and indicate any support for that document, if there is such a desire to express any such support.</p> <p><b>SEA and HRA screening</b> Please see the attached draft screening report and the comments from statutory consultees HE and NE. Policy TR1, with its reference to pontoons, triggers the need for HRA. This automatically triggers the need for SEA. SEA is also required (or further evidence of the effect on heritage assets) for policies TC1-3 and policies HR6 and 7.</p> <p><b>Conformity with Site Allocations DPD</b> Cornwall Council has now agreed its strategy for student accommodation in Falmouth and Penryn and the DPD has been amended. The NDP needs to be amended to be in general conformity with the strategic policy.</p> <p><b>Other general comments:</b> The NDP is being developed in the context of an emerging Site Allocations DPD and needs to be flexible enough not to be superseded by the DPD once adopted. The NDP could also reflect the emerging DPD by showing a green buffer between Falmouth and Budock water. Environment and Open Space:FOS1: key open spaces need to be identified on a map. The local green space designation is a power open to NDPs to protect greenspace and could be used here. This applies to FOS4 and FOS5. TCON1: the requirement for a contribution is a strategic issue, dealt with through Local Plan Policy. TCON 2 could be the priority list for local CIL spend. Culture: Cultural facilities covered by CUL2: need to be identified. The policy may need a clause to allow the redevelopment of redundant facilities. CUL3: Cannot be required as a policy – too prescriptive</p>	



Comment Received	Reference Look-Up
<p>CUL5: Not a policy – but good idea to develop a priority list for delivery of projects and local CIL spend, with community engagement.            DG1: could be onerous for small development – should a threshold be specified?            Saved policies from Carrick District Council Local plan: the Cornwall Local Plan saves 3 policies which relate to Falmouth from the former Carrick Local Plan: 5D car parking, 5H pedestrian priority and 11C Prime Seafront hotel Area. Will the NDP replace these policies?</p>	

Transition Falmouth attachement

### Environmental Issues for Falmouth and Penryn Community Plan

Two meetings were called to discuss these issues with 17 attending and email input from several others.

How will global issues affect us locally in 15 years and how do we prepare locally now.

Conclusions are summarised below and collated responses attached.

These responses are divided into 1) How will global challenges affect us locally, and  
 2) Suggestions for local actions.

#### **‘Future Proofing’ Falmouth and Penryn**

The discussions identified four main themes needing attention in order to assure the future for people and conserve the environment –

- Climate Change,

- Diminishing Resources,
- Global Economics, and
- Human Behaviour.

Cornwall and especially the Falmouth area are vulnerable to the above due to its peripheral location, heavy dependence on diminishing local industry and agriculture and dependence on external economics.

The effects of Climate Change are still unpredictable and difficult to assess but global and national targets for CO2 have been established with increasing responsibility to comply locally.

In view of Cornwall's position at the end of the transport infrastructure the increasing price of oil, gas, water and economic problems will have a galvanising effect on local residents as local finances are dependent on external income - retirement pensions, tourism, benefits system and student input/grants.

The actions of local Businesses and residents are pivotal for any adaptation and mitigation actions. Currently the majority of residents are relatively unengaged, uninformed and unprepared.

The group recommended that all of the community be actively engaged **now**, in creating a vibrant, sustainable and resilient 21<sup>st</sup> century community and that Business, Education, Local Government and Town Forums help with supporting and starting local initiatives. The following are some potential initiatives to help Falmouth and Penryn become a vibrant community for the 21<sup>st</sup> century.

**Futures Conservation Committee for 'future proofing' the area:**

To establish a partnership between Town Councils, Conservation committees, Town Forums, Business, Education, Transition and Environmental groups to plan and monitor development and building practises, so establishing a quality local 21<sup>st</sup> century standard.

**'Falmouth and Penryn (F&P): A Centre of Excellence and Innovation for the 21<sup>st</sup> century':**

A Partnership, (especially including Business and Education), to develop F&P as a National demonstration community for 'preserving the future'.

Conferences/festivals and practical pilot projects... also increasing job and skilling/training opportunities.

Enterprises and improvements for Falmouth and Penryn to create a self regulating, positive, resilient community through:

- Local waste as a resource of materials and energy.
- Local integrated public transport for people, resource movement and business.
- Local renewable Energy generation.
- Local food production, marketing and distribution.
- Local sewage systems improvement and use as a resource.
- Local education, awareness raising, skilling up and piloting projects.
- Local business and local economy - start-ups and support especially relating to marine.
- Local creative and leisure activities and spaces for a healthy Community and local culture.
- Local water conservation and domestic water movement throughout the area.

### **Generating local renewable energy:**

Falmouth and Penryn Energy Company: a local renewable energy community and privately funded business, to produce energy for local use and investment to enable the area to be independent of The Grid when necessary. A pilot project is already being developed with Community Energy Plus..

### **Local Community Economics:**

Through:

- Establishing a local economy that supplies our basic needs locally and establishes a new business/industry that is a cutting edge model/practical example of C21st self reliance and innovation.
- New business start-up and support for established business to future fit their businesses.
- Developing a strong local economy through innovative trading strategies such as Loyalty cards, LETS, Credit Unions and Time Banks to increase and retain local wealth and increase local community capital and health.
- Assisting existing and emerging Business to use the 'triple bottom line' (Economic, Environmental and Social Auditing).
- Supporting the development of Community and Social Enterprises and Co-operatives.

### **Community Capital 'Skilling Up' Programme:**

Humans are highly creative and flexible when motivated by need. An educated, engaged and active community was considered the most important asset for local health, wealth and resilience.

To produce this, a varied programme of educating and skilling include:

1. Community Audit: engaging people personally and creating a 'community balance sheet' - a funded project is already being developed to reach every individual at home, school and work, to assess their personal needs and create an audit of local energy and other requirements/assets. Access grants/funds to upgrade homes and buildings for energy efficiency etc.
2. Build the 'Falmouth Centre for 21<sup>st</sup> century Living' (a partnership already established and site identified for 'skilling up' - traditional and innovative skills for energy and food production and local economics).
3. Support local businesses to assess their energy and transport needs to help decrease their costs and carbon footprint.
4. Ensure that the Community Plan and Community Networks are responsive and effective to re-engage people with the civic and community processes.

## Summary

The Localism Charter, The Sustainable Communities Bill and Cornwall's Community Networks are part of a shift from central government responsibility decision making to local, this means that we are challenged and entitled to establish a locally designed and locally regulated plan for the future.

Falmouth and Penryn area have in the past shown difficulty in reconciling the needs and interests of their very diverse population. This new context of the 15 year Plan and the shared vision of a vibrant resilient future created together will enable diversity to become a strengthening asset.

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## NOTE 1 RE HMO QUESTIONS

I have received the following response from Cornwall Council:

- 1) How will Article 4 affect properties that historically are holiday let or owner occupied through the summer and then student let 10 months of the year?

2) How will Article 4 affect a property that has a HMO licence but is used for holiday let / owner occupied during the summer months but student let for 10 months.

The Article 4 only affects new uses, existing premises can apply for a certificate of lawful use if they wish to have proof of their existing use <http://www.cornwall.gov.uk/environment-and-planning/planning/planning-advice-and-guidance/lawful-development-certificates/>

3) How long can a property with existing HMO use be left empty for renovation works etc before reverting if at all to C3 use.

Professional planning advice should be sought for any premises in this situation to establish the lawful use of the premises and to avoid the loss of that lawful use.

4) The control of HMO's using Article 4 will affect available accommodation for non-students and local companies that rent small HMO's. There are a number of local companies that rent small HMO to house their workers and also groups of professional workers that rent a house together as a way of affording local housing or saving for deposits etc. The restriction could have an effect on local businesses and could lead to an increase in 'sofa surfing' and in some extreme cases rough sleeping. How will the planning policy meet the needs of these groups of people?

The policy does not apply retrospectively. The local plan seeks to provide alternative student accommodation thereby freeing up existing HMOs to meet the needs of the wider population.

5) Are the local residents/homeowners aware of the likely impact Article 4 may have on residential house prices, especially in heavily populated student areas. Some Article 4 cities have reported a 20% decrease in residential property prices.

Because there are a range of factors affecting property prices it is impossible to make specific comments on property values. Arguments have also been made about an uplift in values as a consequence of a direction.

6) How long can a property be empty i.e: for refurbishment where existing established HMO use already exists before it would not count as a C4.

The question relates to whether the existing use is abandoned or not (similar to the question asked above) expert advice should be sought to ensure the existing use is recorded protect any existing use rights. However a properties use isn't usually abandoned when it undergoes a short period of building works.

7) How will the Council/Town monitor unlicensed/smaller HMO's?

Any new HMOs reported to the Council will be investigated by the enforcement team

<https://www.cornwall.gov.uk/environment-and-planning/planning/enforcement/report-a-breach-of-planning-control/>