



Penzance Town Council
The Penlee Centre
Penlee Park
Penzance
Cornwall
TR18 4HE

Date: 20 December 2022

Our Ref: M22/0820-02

By email only:

info@penzance-tc.gov.uk

Dear Sir/Madam

RE: PENZANCE NEIGHBOURHOOD PLAN: PRE SUBMISSION CONSULTATION

On behalf of our client **LiveWest**, Tetlow King Planning writes in response to the Penzance Neighbourhood Plan pre-submission consultation. We previously wrote to you on 31 August 2022, following a letter you wrote to LiveWest dated 28 July 2022 regarding potential Local Green Space designations. LiveWest also wrote to you on 15 August regarding their concerns about potential Local Green Space designations. I append both these letters to this consultation response.

In this letter we highlight the acute need for affordable housing in Penzance and how potential Local Green Space designations would hinder future redevelopment opportunities to provide more affordable homes.

The need for Affordable Homes

As you will be aware LiveWest is a key partner in the delivery and management of new affordable homes in Cornwall and has extensive land interest in Penzance and provides much need affordable homes to the local community. LiveWest would relish the opportunity to provide more affordable housing in Penzance through development opportunities that arise from new sites and maximising their existing assets.

We welcome that the Steering Group recognises the severity of the national housing crisis which is exceptionally acute in Cornwall. LiveWest both actively participates in, and supports the efforts, of the Penzance Council Housing Crisis Working Group and the publication "Trapped": a report on the housing crisis in the Penzance area. The report acknowledges that social housing continues to be depleted by right to buy sales and the affordability of the homeownership and the private rental market is undermined by second homes and AirBnB. The report notes the high number of households on the housing register for Penzance (939 households in November 2021) and the greatest need is for one bedroom properties.

Furthermore, the Housing Needs Assessment (AECOM 2022) confirms a need for 77 social/affordable rented homes and 123 affordable homeownership dwellings a year. The Neighbourhood Plan recognises that importance of affordable housing as meeting the needs of the community to support economic growth. However, perversely despite these evidenced housing needs, the Neighbourhood Plan only makes one new housing allocations (Policy H10: Adult Social care site, Roscadghill Road, Heamoor) and otherwise refers to the allocations that have already been made in the Cornwall Site Allocations DPD (November 2019). It is disappointing that the neighbourhood plan steering group has not made any further housing allocations, this is a missed opportunity to actively address the housing crisis. We would urge the neighbourhood plan steering group to make further allocations for the Penzance area.

Planning sufficient homes for the future

We note that the neighbourhood plan is only planning for the time horizon until 2030. By the time the neighbourhood plan is made, which could be by the end 2023 if it receives referendum support, there will be only 7 years remaining. It is understood that this time period was chosen to be in conformity with the Cornwall Local Plan which plan period expires in 2030. However, the Cornwall Local Plan is dated, it has a plan period of 2010-2030 and was adopted in 2016. The 2012 Regulations stipulate that local plans should be reviewed at least once every five years¹ and this legal requirement is reaffirmed in paragraph 33 of the National Planning Policy Framework (NPPF, July 2021). Cornwall Council has not commenced a review of its local plan nor has it prepared an updated housing needs assessment for the County. Furthermore, the current Strategic Housing Market Assessment (SMHA) dates from 2013 and is nearly a decade old.

It is not a mandatory requirement for the neighbourhood plan period to align with the local plan, the neighbourhood plan could be proactive and define its own housing requirement and plan for new homes beyond 2030. National planning guidance encourages neighbourhood plans to be proactive and plan for growth; paragraph 13 of the NPPF states:

“Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.”

To this end, the PGG states:

“Neighbourhood planning bodies are encouraged to plan to meet their housing requirement, and where possible to exceed it. A sustainable choice of sites to accommodate housing will provide flexibility if circumstances change, and allows plans to remain up to date over a longer time scale.”²

Page 64 references the housing requirement from the Cornwall Local Plan which establishes between 2010 and 2030 it should be a minimum of 2,150 new homes in and around Penzance. It then continues to state that as March 2021, this figure had been exceeded with 2,171 commitments.

However, the 2,150 new homes for Penzance is a minimum apportionment of the Cornwall wide minimum target of 52,500 new homes across the 20 year plan period. It is clearly an indicative requirement and not a cap or ceiling to development.

The PPG is clear that neighbourhood planning bodies can and should exceed their local housing requirement figure.

Paragraph 103 of the PPG continues:

“Where neighbourhood planning bodies intend to exceed their housing requirement figure, proactive engagement with their local planning authority can help to assess whether the scale of additional housing numbers is considered to be in general conformity with the strategic policies.”³

As a result of only planning until 2030, the Penzance Neighbourhood Plan will need to be reviewed within a few years of it being made. It would therefore be sensible to pause the development of the neighbourhood plan and define a housing requirement and proactively plan for the future, especially given the high priority given to affordable housing.

Local Green Space

As the neighbourhood plan evidence base indicates, the need for affordable homes has never been so great and it is therefore extremely concerning that it is proposed to allocate 19 of LiveWest sites as Local Green Space. Consequently, stifling any future development opportunities that may exist including refurbishment and upgrading existing residential accommodation. It is very disappointing that notwithstanding our previous correspondence on this matter that the neighbourhood steering group has

¹ (Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012

² PPG Paragraph: 103 Reference ID: 41-103-20190509

³ Ibid

pursued the Local Green Space designations unchanged and not sought to critically review the necessity and justification for these designations.

As we outlined in our earlier letter, Local Green Space is a designation which should only be used in exceptional circumstances. As NPPF and PPG outline it is a designation that is not appropriate for most green areas or open spaces. Accordingly, the bar for establishing Local Green Space is very high as it warrants the same protection as Green Belt.

Open Spaces already have an existing level of protection in national and local planning policies. The NPPF, paragraph 99 states:

Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or

b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or

c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

Policy 25 of the Cornwall Local Plan reflects the national policy approach and resist the loss of open to other uses unless the land is demonstrated to be surplus to requirements or replace by an equivalent (or better) provision in terms of quantity or quality. Critically, this is not a blanket protection of open spaces but allows a pragmatic view to be taken on development proposal that may bring other benefits and encourages improvements to the quality, not necessarily quantity of, open space provision. The delivery of affordable homes is one such benefit which may outweigh the loss of open space.

The NPPF is clear that the LGS designation should be used positively by local communities, promoting sustainable development and not as an anti development tool, paragraph 101 states:

“The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services.”

The significance of this point is emphasised in the PPG:

“Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making.”

Paragraph 007 Reference ID: 37-007-20140306

In light of the planning policy approach to protecting open spaces, there is no need to designate every single open space as Local Green Space. Indeed paragraph 102 of the NPPF outlines specific criteria that all Local Green Space designations must meet in order to be justified:

“The Local Green Space designation should only be used where the green space is:

a) in reasonably close proximity to the community it serves;

b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and

c) local in character and is not an extensive tract of land.”

However, notwithstanding the NPPF definition making it clear that it should only be applied to special open space of local significance and value, the steering group has applied the designation excessively to virtually every open space in the town and proposes a total of 106 local green space designations.

As we expressed in our previous correspondence, we had concerns whether the steering group had the evidence to support the exhaustive list of Local Green Space designations. We have strong reservations that the designations have been determined on an anti-development stance and not on the basis of them being local significance and value required by paragraph 102 of the NPPF.

The steering group seems to have justified the designation of majority of the 106 LGS proposals on the basis on the sites being included in the Cornwall Council's document 'Open Space Strategy for Larger Town on Cornwall (July 2014)'. The document is essentially an audit of all open spaces in Cornwall's 16 towns including Penzance, noting different types of open spaces ranging from incidental green spaces, allotments, cemeteries formal parks and playing pitches. Being an audit based document, it is simply collating an exhaustive list of open space which is distinctly different to Local Green Space which needs to be of local significance and value. Just because an open space is included in the Open Space Strategy doesn't mean that it warrants special protection. Local Green Space is only supposed to be designated in exceptional circumstances and to suggest that the designation should be applied to 106 open spaces is flawed. Moreover, it lessens the importance of the designation suggesting that it should be equally applied to a small area of incidental amenity space as a local park.

In our previous correspondence, we cited several examples where planning inspectors for local plan examinations have highlighted that local planning authorities have been using Local Green Space designations too widely, see attached letter dated 31 August 2022. Similarly, Neighbourhood Plan examiners have been equally critical of neighbourhood plans that have failed to provide an adequate evidence base to justify Local Green Space designations. Our previous letter highlights examples from Padstow, Portreath and Saltash where Local Green Space designations were deleted due to lack of evidence. The Planning Inspectors and Examiners were all clear that designation should be used sparing and by its NPPF definition it is not a designation appropriate for all green spaces.

At the time LiveWest and TKP wrote to the steering group in August, the evidence base to support the proposed Local Green Space designations had not been published. We requested to have sight of the evidence base but this was not forthcoming.

We have now had an opportunity to review the evidence base that has been published alongside the draft neighbourhood plan and provide a detailed response to all the LiveWest sites in the enclosed schedule. It is clear that there is no clear justification for any of the Local Green Space designations, none of them meet the requirements tests of paragraph 102 of the NPPF.

The Evidence Statement Local Green Space references questions from the Neighbourhood Plan Questionnaire:

***Q19 There will be a protected green infrastructure; a network of open and green spaces, linked by paths, bridleways, green lanes and cycle ways across the parish; and
Q20 Public open spaces will be protected from development.***

The respondents were asked to state whether they: strongly agree, agree, neither agree nor disagree, disagree or strongly disagree to these questions. Both questions 19 and 20 are statements they do not pose a question and are **very leading statements**. Very few people are likely to say that they would like open spaces built on and therefore disagree with question/statement 20. The public will not be aware of the context; that both national policy and local plan policy 25 already protect open spaces and any loss will be resisted and even in stances where it is acceptable replacement open space is often required.

Therefore, justifying the Local Green Spaces on the basis of local support is flawed if it is reliant on the public's responses to questions 19 and 20 as they answered these questions/statement without the benefit of the full facts.

It is notable how small many of the sites are and whilst the NPPF warns against the allocating extensive tracts of land, the opposite can be said of some of these sites which are just incidental green areas adjacent to housing developments. This point was noted by the examiner for the Saltash neighbourhood plan:

“I was surprised at some of the designations which included very small sites that were not demonstrably special at all.”

This same statement could be made in relation to many of the LiveWest's sites that you propose as Local Green Space allocations. There is little point in designating these sites as Local Green Space and besides none of these sites meet the stringent tests of paragraph 102 of the NPPF. All these spaces have current protection under local plan policy 25.

We repeat a significant paragraph from the NPPF quoted earlier in this letter, paragraph 101:

‘Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services.’

It is clear that the proposed LGS designations will undermine one of the ambition of the neighbourhood plan to address their communities housing needs.

If the neighbourhood planning steering group is serious about addressing the housing crisis then it needs to be proactive and allocate more sites for housing. Simply relying on sites already allocated in the Site Allocation DPD is not enough. LiveWest, as a major landowners, has numerous assets in the town, to allocate these sites as Local Green Space is short sighted and stifle any future redevelopment opportunities. To be future proof the neighbourhood plan needs to proactively plan for Penzance's growth by allocating more housing sites which will boost the supply of affordable homes.

We would welcome further opportunities to actively engage with the steering group on the development of the neighbourhood plan. Please can you add my details to your consultation list and notify me of future consultations.

Yours sincerely



ROSIE DINNEN
DIRECTOR BA (HONS) DIPTP MRTPI
For and On Behalf Of
TETLOW KING PLANNING

rosie.dinnen@tetlow-king.co.uk

Enc. TKP review of LGS Evidence
TKP letter dated 31.08.22
LiveWest letter dated 15.08.22

TKP REVIEW OF LOCAL GREEN SPACE EVIDENCE

NP Ref	Address	Local in Character	Need	Access barriers	Beauty	Historic	Recreational Value	Tranquillity	Richness of Wildlife	Evidence to support Local Significance	Evidence of TC support
20	Mount Misery Allotments	The site is within the urban area and linked physically by roads and pedestrian routes, visually to nearby housing and socially to allotment holders.	yes, long waiting list for allotments in the parish	access for allotment holders	green space and boundary trees on the edge of the urban area		allotments	Yes, away from Traffic	linked to Newlyn Coombe biodiversity corridor	NP questionnaire responses support protection of open spaces; Town Council waiting list for allotments.	Managed by the Town Council
TKP RESPONSE											
20	Mount Misery Allotments	The site is tucked away and screen from public views	A waiting list for an allotment does not demonstrate that the site should be LGS by virtue of being special. Local plan policy 25 resists the development of green spaces unless there are exceptional circumstances. It is not known how often the waiting list is reviewed and whether people on the list are still actively seeking an allotment.		It is typical allotment space there is nothing uniquely special in beauty to warrant its designation as LGS. It has a recreational value but this does not justify its designation as LGS.					A waiting list for an allotment does not demonstrate that the site should be LGS on the basis of local significance.	
NP Ref	Address	Local in Character	Need	Access barriers	Beauty	Historic	Recreational Value	Tranquillity	Richness of Wildlife	Evidence to support Local Significance	Evidence of TC support
21	Alverton Playing Fields (Mount Misery)	The site is on the edge of the urban area and linked physically to estate roads, visually to nearby housing and socially as a community amenity and play space.	Cornwall Council's Open Space Strategy for Larger Towns identified a lower than typical level of natural space in Penzance/Newlyn. The site is located on the edge of a residential area. NDP questionnaire responses are supportive of retaining and improving green spaces/public open space. More specifically a proposal to develop the site was resisted strongly, led by a local community group (Action for Alverton) with support from local Councillors.	no	Green Amenity Space in urban area		Green Amenity space and playing field	Away from main Traffic routes	boundary trees, linked to adjacent woodland and Newlyn Coombe biodiversity corridor	Cornwall Council Open Space strategy. NP questionnaire responses.	Town Councillor support for opposing development of the site
TKP RESPONSE											
21	Alverton Playing Fields (Mount Misery)	The site is tucked away behind a residential development. Residents of the adjacent housing have limited views into the site from the rear of their properties. Otherwise, the site is well screened by vegetation	LGS should not be used as an anti development tool. Open spaces are protected by local plan policy 25 and any development proposals will be assessed against this policy and other benefits of the scheme will be weighed in the planning balance. Its inclusion in the Open Space Strategy doesn't mean anything, it is an audit of spaces, it doesn't warrant its protection by LGS.		It is grassed field, it is not in a special landscape area or have any features that makes it particularly special in terms of beauty.		The site has historically had some recreation value		There are some trees on site.	Inclusion in the Open Space Strategy doesn't make it locally significant. Q19 & 20 in questionnaire are leading questions about the protection of open spaces.	This is an anti development statement which does not justify its inclusion as LGS.

NP Ref	Address	Local in Character	Need	Access barriers	Beauty	Historic	Recreational Value	Tranquillity	Richness of Wildlife	Evidence to support Local Significance	Evidence of TC support
22	Mount's Bay Road Allotments	The site is within the urban area and linked physically by roads and pedestrian routes, visually to nearby housing	yes, long waiting list for allotments in the parish	no longer accessible			previous and potential future use as allotments			Penzance Town Council waiting list for allotments.	former management of site as allotments
TKP RESPONSE											
22	Mount's Bay Road Allotments	This is very small site completely enclosed by residential development and screened from general views.	A waiting list for an allotment does not demonstrate that the site should be LGS by virtue of being special. local plan policy 25 resists the development of green spaces unless there are exceptional circumstances. It is not known how often the waiting list is reviewed and whether people on the list are still actively seeking an allotment.					It is a very small space that is not publicly accessible, it is screened from all sides by residential development and therefore offers limited visual amenity or beauty and is not uniquely special to warrant being LGS.		A waiting list for an allotment does not demonstrate that the site should be LGS on the basis of local significance.	This doesn't justify its allocation as LGS
NP Ref	Address	Local in Character	Need	Access barriers	Beauty	Historic	Recreational Value	Tranquillity	Richness of Wildlife	Evidence to support Local Significance	Evidence of TC support
26	Princess Royal Gardens	The site is within the urban area and adjacent to estate roads, visually linked to nearby housing and socially as a community amenity space.	Cornwall Council's Open Space Strategy for Larger Towns identified a lower than typical level of natural space in Penzance/Newlyn. The site is located within a residential area. NDP questionnaire responses are strongly supportive of retaining and improving open green spaces.	no	Trees and green space in urban area		Amenity and informal play space		Trees are supportive of wildlife	NP questionnaire responses	
TKP RESPONSE											
26	Princess Royal Gardens	The site is related to adjacent housing development	Its inclusion in the Open Space Strategy doesn't mean anything, it is an audit of open spaces, it doesn't warrant its protection by LGS.					The open space provides a visual break and has some localised amenity value but this in itself is not sufficient to warrant its protect as LGS. The land has sufficient protection already by local plan policy 25.		Q19 & 20 in questionnaire are leading questions about the protection of open spaces.	
NP Ref	Address	Local in Character	Need	Access barriers	Beauty	Historic	Recreational Value	Tranquillity	Richness of Wildlife	Evidence to support Local Significance	Evidence of TC support
27	Lansdowne Road Amenity Space	The site is within the urban area and adjacent to estate roads, visually linked to nearby housing and socially as a community amenity space	Cornwall Council's Open Space Strategy for Larger Towns identified a lower than typical level of natural space in Penzance/Newlyn. The site is located within a residential area. NDP questionnaire responses show strong support for the retention and improvement of open green spaces.	no	green space in an urban area		amenity space, informal play space			NP questionnaire responses	

TKP RESPONSE											
27	Lansdowne Road Amenity Space	The site is related to adjacent housing development	Its inclusion in the Open Space Strategy doesn't mean anything, it is an audit of open spaces, it doesn't warrant its protection by LGS.		The open space provides a visual break and has some localised amenity value but this in itself is not sufficient to warrant its protect as LGS. The land has sufficient protection already by local plan policy 25.					Q19 & 20 in questionnaire are leading questions about the protection of open spaces.	
NP Ref	Address	Local in Character	Need	Access barriers	Beauty	Historic	Recreational Value	Tranquillity	Richness of Wildlife	Evidence to support Local Significance	Evidence of TC support
37 & 38	Prospect Place Flat Amenity Area St Clare	yes, within the housing site; connected physically - access from flats -, visually - views from flats - and socially - informal meeting/play space	yes, there is a shortage of open space in the area. The spaces contribute visually and environmentally to the housing area and wider townscape.	no			yes, informal amenity and play space.			NP questionnaire responses show general support for protecting green spaces.	
TKP RESPONSE											
37 & 38	Prospect Place Flat Amenity Area St Clare	It is open space associated with the housing estate.	It is accepted that the residents need some amenity space to ensure a quality living environment.		The open space has some localised amenity value for the local residents but this in itself is not sufficient to warrant its protect as LGS. The land has sufficient protection already by local plan policy 25. Its inclusion as LGS would stymie any development potential of the housing estate. Any new redevelopment proposals would be expected to provide replacement open space.					Q19 & 20 in questionnaire are leading questions about the protection of open spaces.	
NP Ref	Address	Local in Character	Need	Access barriers	Beauty	Historic	Recreational Value	Tranquillity	Richness of Wildlife	Evidence to support Local Significance	Evidence of TC support
39	Pendarves Flats Amenity Space	yes, within the housing site and connected physically - access from flats -, visually - outlook from flats and from adjacent public roads and pedestrian routes - and socially - informal meeting/seating space.	yes, there is a shortage of open space in the area and particularly in the locality.	no			yes, informal amenity and play space		Existing trees support wildlife; potential for management to increase biodiversity value		
TKP RESPONSE											
39	Pendarves Flats Amenity Space	It is open space associated with the housing estate.	It is accepted that the residents need some amenity space to ensure a quality living environment.		The open space has some localised amenity value for the local residents but this in itself is not sufficient to warrant its protect as LGS. The land has sufficient protection already by local plan policy 25. Its inclusion as LGS would stymie any development potential of the housing estate. Any new redevelopment proposals would be expected to provide replacement open space.						
NP Ref	Address	Local in Character	Need	Access barriers	Beauty	Historic	Recreational Value	Tranquillity	Richness of Wildlife	Evidence to support Local Significance	Evidence of TC support
40 & 41	Jack Stephens Estate Amenity Space (West & East)	The spaces are within the housing site; connected physically - access from dwellings and pedestrian routes -, visually - outlook from dwellings - and socially -	yes, there is a shortage of open space in the area.	no			yes, informal amenity and play space		Potential for management to support biodiversity	The play space may not be viable as an equipped facility but the green spaces contribute to the housing environment and have value for informal use within	

		informal meeting/play space.									the site. Questionnaire responses show general support for protecting green spaces.		
TKP RESPONSE													
40 & 41	Jack Stephens Estate Amenity Space (West & East)	It is open space associated with the housing estate.	It is accepted that the residents need some amenity space to ensure a quality living environment.		The open space has some localised amenity value for the local residents but this in itself is not sufficient to warrant its protect as LGS. The land has sufficient protection already by local plan policy 25. Its inclusion as LGS would stymie any development potential of the housing estate. Any new redevelopment proposals would be expected to provide replacement open space.							Q19 & 20 in questionnaire are leading questions about the protection of open spaces.	
NP Ref	Address	Local in Character	Need	Access barriers	Beauty	Historic	Recreational Value	Tranquillity	Richness of Wildlife	Evidence to support Local Significance	Evidence of TC support		
47	Coombe Lane - Combe Road Amenity Space	yes, the sites are within a residential area, connected physically and visually to adjacent roads and footpath and socially to the community meeting/play space.	There is a shortage of open space in the area. Small amenity spaces are often at risk of being utilised for parking				yes, enjoyment of green route and play space		Existing trees and planned planting support wildlife and are connected to other trees in the locality				
TKP RESPONSE													
47	Coombe Lane - Combe Road Amenity Space	The land is effectively a roundabout island of amenity space. A footpath runs through it and there are road signs at the edge. There are no landscape features.	No open spaces should be parked upon but that should be a reason to suggest it for a LGS designation. A shortage of green space also isn't a justification for LGS.		The open space has some localised amenity value for the local residents but this in itself is not sufficient to warrant its protect as LGS. The land has sufficient protection already by local plan policy 25. Its inclusion as LGS would stymie any development potential of the housing estate.							Not completed in evidence base	
NP Ref	Address	Local in Character	Need	Access barriers	Beauty	Historic	Recreational Value	Tranquillity	Richness of Wildlife	Evidence to support Local Significance	Evidence of TC support		
48	Col Coombe Play Space	yes, the sites are within a residential area, connected physically and visually to adjacent roads and footpath and socially to the community meeting/play space.	There is a shortage of open space in the area. Small amenity spaces are often at risk of being utilised for parking				yes, enjoyment of green route and play space		Existing trees and planned planting support wildlife and are connected to other trees in the locality				
TKP RESPONSE													
48	Col Coombe Play Space	The site is a children's play area and some incidental green space.	No open spaces should be parked upon but that should be a reason to suggest it for a LGS designation. A shortage of green space also isn't a justification for LGS.				The site has recreational value.		The site has some mature trees.	Not completed in evidence base			
NP Ref	Address	Local in Character	Need	Access barriers	Beauty	Historic	Recreational Value	Tranquillity	Richness of Wildlife	Evidence to support Local Significance	Evidence of TC support		
86	Treweath Road Amenity Space	yes, the sites are within a residential area, connected physically and visually to adjacent roads and footpath and socially to the community meeting/play space.	There is a shortage of open space in the area. Small amenity spaces are often at risk of being utilised for parking	no			yes, enjoyment of green route and play space		Existing trees and planned planting support wildlife and are connected to other trees in the locality		yes, the sites are within a residential area, connected physically and visually to adjacent roads and footpath and socially to the community meeting/play space.		

TKP RESPONSE												
86	Treweath Road Amenity Space	The land forms two landscape buffer areas between the road and houses.	No open spaces should be parked upon but that should be a reason to suggest it for a LGS designation. A shortage of green space also isn't a justification for LGS.		The open space has some localised amenity value for the local residents but this in itself is not sufficient to warrant its protect as LGS. The land has sufficient protection already by local plan policy 25. Its inclusion as LGS would stymie any development potential of the housing estate.						Not completed in evidence base	
NP Ref	Address	Local in Character	Need	Access barriers	Beauty	Historic	Recreational Value	Tranquillity	Richness of Wildlife	Evidence to support Local Significance	Evidence of TC support	
49	Parc Mellan Green Space	yes, physical access from adjacent roads and pathways, visually connected to surrounding houses, informal meeting/play space	yes, there is a shortage of open space in the area (Cornwall Council audit) and NDP questionnaire responses support retention of green spaces	no			yes, informal play	positive contribution to the housing environment	green space, potential for management, including wild flower planting, to support biodiversity	part of the original (1930s) development layout		
TKP RESPONSE												
49	Parc Mellan Green Space	A small area of amenity space within a residential development.	A shortage of green space isn't a justification for LGS as open already protected by local plan policy 25.		The open space has some localised amenity value for the local residents but this in itself is not sufficient to warrant its protect as LGS. The land has sufficient protection already by local plan policy 25.						This doesn't justify its designation as LGS, open space already protected by local plan policy.	
NP Ref	Address	Local in Character	Need	Access barriers	Beauty	Historic	Recreational Value	Tranquillity	Richness of Wildlife	Evidence to support Local Significance	Evidence of TC support	
62	Rosehill Meadow Playspace	within the community, connected physically, visually and socially to surrounding housing	yes, need for play space within a relatively high density residential area	No			Local play space			general support from NDP questionnaires for retaining/improving open/play space		
TKP RESPONSE												
62	Rosehill Meadow Playspace	A small children's play area in residential area			The play area has some localised amenity value for the local residents but this in itself is not sufficient to warrant its protect as LGS. The land has sufficient protection already by local plan policy 25.						Q19 & 20 in questionnaire are leading questions about the protection of open spaces.	
NP Ref	Address	Local in Character	Need	Access barriers	Beauty	Historic	Recreational Value	Tranquillity	Richness of Wildlife	Evidence to support Local Significance	Evidence of TC support	
70	Pendennis Road Amenity Space/ Green space and verges, Pendennis Road	Yes, connected physically and visually - adjacent to public road - and socially - close to residential areas.	yes, there is a shortage of green space in the area and this part of the town - the amenity space has potential for some tree planting and wider biodiversity planting.	no			Informal open amenity space		Potential for planting to support wider biodiversity as part of a green network of small sites.	Questionnaire results		
TKP RESPONSE												
70	Pendennis Road Amenity Space/ Green space and verges, Pendennis Road	Small area of amenity space adjacent to resident development.	A shortage of green space isn't a justification for LGS as open already protected by local plan policy 25.		The open space has some localised amenity value for the local residents but this in itself is not sufficient to warrant its protect as LGS. The land has sufficient protection already by local plan policy 25. Its inclusion as LGS would stymie any development potential of the housing estate.						Q19 & 20 in questionnaire are leading questions about the protection of open spaces.	
NP Ref	Address	Local in Character	Need	Access barriers	Beauty	Historic	Recreational Value	Tranquillity	Richness of Wildlife	Evidence to support Local Significance	Evidence of TC support	
81 & 82	Freshbrook Close Green Space (south)	Within the developed area, central to housing area and connected physically, visually and socially..	need for green space in relatively high density residential area.	no			yes, amenity and community events space			important as contribution to the local housing environment.		

TKP RESPONSE											
NP Ref	Address	Local in Character	Need	Access barriers	Beauty	Historic	Recreational Value	Tranquillity	Richness of Wildlife	Evidence to support Local Significance	Evidence of TC support
81 & 82	Freshbrook Close Green Space (south)	Small area of incidental open space which provides some amenity and buffer to Bramwell Lane.	As an existing open space the land already has protection under local plan policy 25.							The open space has some localised amenity value for the local residents but this in itself is not sufficient to warrant its protect as LGS. The land has sufficient protection already by local plan policy 25.	There is no evidence to support local significance/value.
87	Foxes Field Play Space	Within the developed area, central to housing area.	need for play space in relatively high density residential area.	no			yes, play space				
TKP RESPONSE											
87	Foxes Field Play Space	Small children's play area.								The play space provides some localised amenity value for the local residents but this in itself is not sufficient to warrant its protect as LGS	Not completed in evidence base