

## Hayle Neighbourhood Plan – Regulation 14 Consultation Responses

	FROM	COMMENT	CONSULTANTS' COMMENTS	NPSG NOTES
		<b>GENERAL COMMENTS</b>		
1	T Pinnington TR27 6JS 22 Jul 17	<i>I support the plan without amendments (Ticked)</i>	No action required.	No action required.
2	Passmore Edwards Institute 22 Jul 17	<i>I support the plan without amendments (Ticked)</i>	No action required.	No action required.
3	Harvey's Foundry Trust Ltd 22 Jul 17	<i>I support the plan without amendments (Ticked)</i>	No action required.	No action required.
4	Hayle Harbour Trust Ltd 22 Jul 17	<i>I support the plan without amendments (Ticked)</i>	No action required.	No action required.
5	M J Biro TR27 4QB 6 Jul 17	<b>General</b> <i>I support the plan without amendments</i>	No action required.	No action required.
6	6 Jun 17	<b>General</b> <i>Thank you for your e-mail. I have circulated the NDP documents to officers in the Council and we will be in touch with our response once I have collated the comments from officers.</i>	No specific action required	No specific action required.
7	South West Water 7 Jun 17	<b>General</b> <i>Thank you for providing details of the above the content of which is noted and upon which South West Water has no comment at this time.</i>	No specific action required	No specific action required.
8	Gwinear-Gwithian PC 27 Jun 17	<b>General</b> <i>Thank you for consulting GGPC on your plan. The PC has no comment to make.</i>	No specific action required	No specific action required.
9	St Ives TC 6 Jul 17	<b>General</b> <i>The Hayle NDP was considered at our Planning Committee meeting on 22 June, at which time it was noted. Having gone through the process, St Ives Councillors fully appreciate the extent of the effort and dedication that goes into producing a neighbourhood plan and so the committee asked that the Hayle Neighbourhood Plan Group be wished all the best with bringing your plan to completion.</i>	No specific action required	No specific action required.
10	Ludgvan PC 18 Jul 17	<b>General</b> <i>Thank you for consulting the Parish Council whilst we have no substantive comments to make the council were impressed with the professional way in which the Plan was presented.</i>	No specific action required	No specific action required.
11	Network Rail 4 Aug 17	<b>General</b> <i>As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. 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.</i>	No specific action required	No specific action required.

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		<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> <ul style="list-style-type: none"> <li>• (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".</li> </ul> <p>We would appreciate the Council's providing Network Rail with an opportunity to comment on any future planning policy documents as we may have more specific comments to make (further to those above) and we trust these comments will be considered in your preparation of the forthcoming Plan documents.</p>		
		<b>HAYLE BY THE NUMBERS</b>		
12	Planning Cornwall Council 1 Aug 17	<p><b>Foreword</b> 3<sup>rd</sup> para. Not quite. Also has to be in line with the policies. It's only if there is no Local plan or no 5 year land supply that any application that represents sustainable development' is approved.</p>	Should be amended	Foreword, P1, amended to include reference to compliance with CLP
13	Planning Cornwall Council 1 Aug 17	<p><b>Hayle by Numbers</b> 2.5 Check updated figures supplied by affordable housing officer in comments. All those on Housing needs register can demonstrate a local connection.</p>	See S15	Para 2.5 updated with August 2017 figures from Cornwall Council.
14	Planning Cornwall Council 1 Aug 17	<p><b>Hayle by Numbers</b> 2.6 Cornwall average is 11.2% What is the evidence for this statement. Census data indicates 4.6% 'homes with no usual residents' but this would not include purpose built holiday accommodation.</p>	<p>The 14% of Hayle North was taken from Cllr Andrew Wallis's website as the footnote points out. Are there any more recent estimates? Suggest adding the following text to the footnote... "Data used by Cllr Andrew Wallis in his blog is taken from the Cornwall Council Holidays Lets Business Rates database on 29-11-12 and the Second Homes Council Tax database on 27-11-12 and equates to 8% of household spaces being of these types."</p>	Para 2.6 amended. Since the figures for second homes can only be an estimate, it has been amended to 6-8%
15	Lichfields for Bourne Leisure 5 Aug 17	<p><b>Section 2 'Hayle by the Numbers', paragraph 2.17, page 9 Support with Comment:</b> Bourne Leisure considers that there should be more emphasis in the emerging Plan's analysis on the positive contribution of tourism to the area. Tourism is a major provider of local employment in rural areas such as here and attracts significant investment to the local economy; Bourne Leisure is of the view that such benefits should be fully reflected in the Neighbourhood Plan. Also, the percentage of employment related to the tourism industry noted within the above paragraph differs to that provided in paragraph 6.4 of the same consultation document, which notes: "Tourism is the single largest employment sector, supporting 34% of all employment" Bourne Leisure considers that both paragraphs should be consistent with each other, in terms of the percentage of employment stated as related to tourism. Bourne Leisure therefore requests that the following amendment is made to draft paragraph 2.17: "Data for the Penwith area (covering the area from Hayle to Land's End) show that 25% / 34% of employment is related to the tourism industry. Hayle's tourism offer includes three miles of superb beaches, Paradise Park, bird and animal sanctuary, and the World Heritage Site. Hayle is the second</p>	<p>First sentence of 2.17 could be removed if it confuses. It refers to the whole of Penwith district, whereas 6.4 covers just Hayle neighbourhood area.</p> <p>Additional text underlined seems to be acceptable.</p>	Para 2.17. The wording of this section was rewritten to use the data from Cornwall Council that showed about 17% employment in tourism in Hayle. The NPSG did not feel the word 'significant' should be used.

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		<p><i>largest provider of tourist accommodation in Cornwall (after Newquay); it generates significant employment and attracts significant investment into the local economy. Most of the bed-spaces are in fixed caravans. Tourism is focussed on the summer holiday season and consequently many tourism jobs are not full time.</i></p> <p><b>[proposed amendments underlined]</b></p>		
<b>THE STRATEGIC CONTEXT &amp; FRAMEWORK</b>				
16	Local Plan Team 1 Aug 17	<p><b>General</b> Ref paragraph 3.40, point of clarification: the CIL Draft Charging Schedule will be going out for consultation 12 June – 7 August 2017. It is recommended that the NP Steering Group keep themselves up to date with the infrastructure types/projects which Cornwall Council identify in their CIL Regulation 123 List. Although Parish and Town Councils have more flexibility in terms of what they can spend their CIL Neighbourhood Portion on, they will need to report information on expenditure to Cornwall Council on an annual basis, and this includes demonstration that it has not been spent on items of infrastructure for which S106 has been sought.</p>	Refer to Town Council	Noted and referred to town council.
17	Planning Policy Aug 17	<p><b>General</b> The NDP needs to be updated to reflect the current adopted status of the Cornwall local plan and the pre-submission consultation version of the Site Allocations DPD. I have highlighted some references which are out of date.</p>	Should be up-dated	Wording has been amended to reflect the current status of the CLP and DPD.
18	Planning Policy Cornwall Council 1 Aug 17	<p><b>General</b> Applying additional criteria to sites within the DPD Allocation needs to be done with care to ensure that it does not render those sites undeliverable. It may cause conflict/confusion with applicants unsure which standards they need to respond to.</p>	Advice that should be borne in mind	No specific action.
19	Planning Cornwall Council 1 Aug 17	<p><b>Strategic context</b> 3.3, 3.5, 3.6, 3.7 Update references to the CLP and up-date figures to 2017 3.11 check links are up-to-date 3.22 needs up-dating</p>	Should be up-dated	Links have been checked.
20	Planning Cornwall Council 1 Aug 17	<p><b>CIL</b> 3.40 June 2017</p>	Should be up-dated	The date of expected adoption was updated.
21	Lichfields for Bourne Leisure 5 Aug 17	<p><i>Neighbourhood Plan Framework, paragraph 4.1, page 19 Support with Comment: Paragraph 4.1 sets out the vision for the Hayle Bourne Leisure endorses the vision for Sustainable Tourism, and understands the importance of protecting the environment. As many of Bourne Leisure's sites are located in rural and/or coastal areas, incorporating or adjacent to environmentally and ecological sensitive sites, the Company has significant experience of operating within and adjacent to such locations and takes the need for conservation and enhancement fully into account – both in day to day operations and when preparing development proposals for sites. Bourne Leisure considers however that development can be permitted in relation to sensitive locations, where adequate environmental mitigation measures are provided. Accordingly, Bourne Leisure considers that it is important that the Hayle Neighbourhood Plan includes clear policy provision for development proposals to be considered on a case-by-case basis and taking into account any mitigation measures proposed to be provided. This revised approach is consistent with the Cornwall Local Plan Policy 5 – Business and Tourism. This would help ensure that suitable and sustainable development proposals that would bring positive benefits to the local area</i></p>	The topics and themes have been through a process of consultation and approval. They should not be altered unless they are out of kilter with the final Plan. The current theme for ST is supportive of tourism development but not at the expense of the environment. To be seen as being a little more flexible and pro-development you could amend it to: "We will support tourism growth if it benefits the economy of the area and adverse impacts on our sensitive environment are unavoidable, they must be suitably mitigated"	No change

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		would not be prevented from coming forward where they include appropriate and achievable mitigation measures. Bourne Leisure therefore requests that the following amendment is made to draft paragraph 4.1: "Sustainable Tourism – We will support tourism growth if it benefits the economy of the area and <u>where any harm to our sensitive environment is suitably mitigated does not harm our sensitive environment</u> <b>[proposed amendments underlined]</b>		
		<b>SUSTAINABLE DEVELOPMENT (SD)</b>		
22	Cranford (Hayle LLP) 26 Jul 17	<b>Sustainable Development Introduction</b> Comment: Since the publication of the draft Site Allocations DPD, land to the north of Marsh Lane, Hayle has been granted planning consent for retail development under reference PA16/03519. Map 2 should either be amended to show the site coloured grey as a site with an existing consent or, if the Map is to remain as per the 2016 document, a footnote should be added to the effect that it only denotes consents as at that date and does not show more recent consents such as our client's land at Marsh Lane.	Ensure the map in the NP is up-to-date and the date is indicated on the map or in its title	Completed. A link to the Cornwall Council DPD site now included.
23	Planning Policy Cornwall Council 1 Aug 17	<b>Sustainable Development Section</b> The Allocation DPD map needs to be updated to reflect the publication stage, larger allocation area.	Include up-dated map	The map in the latest draft of the DPD is included.
24	Cranford (Hayle LLP) 26 Jul 17	<b>Policy SD1</b> Comment: This Map defines the extent of the built-up area of Hayle (and other settlements) within which development is supported in principle. As currently drafted the Plan omits land at Marsh Lane from the defined built up area. The existing West Cornwall Retail Park, Hayle Rugby Club, the roadside uses adjacent to the A30 (McDonalds, Brewers Fayre, Premier Inn and Shell PFS) the Marsh Lane Industrial Estate and our client's land to the north of Marsh Lane (subject to planning consent PA16/03519) are all excluded from the defined built up area. The Map should be amended to include all of these areas within the defined built up area. They are all either extensively developed already or alternatively benefit from planning consents for major retail development. They clearly form part of the defined built up area of Hayle and to exclude them from the built-up area boundary is illogical and unless amended, will undermine the value of defining a built-up boundary to the town.	A review of the BUAB in conjunction with the LPA is appropriate	The NPSG discussed the use of the name Built-up Area which has specific meanings in different contexts. Since we are defining areas to which <i>Policy SD1</i> will apply, and this relates to housing, we will rename the area "Settlement Area Boundaries". The map will be amended to remove areas that are industrial or commercial.
25	DLA on behalf of Sennybridge (Hayle) 2 Aug 17	2.1 The allocation for Development within the Built-up Areas must maximise the amount of future development close to Hayle Harbour, in order to secure its future. 2.2 The consented Hayle Harbour redevelopment (W1/08-0613 and PA13/01370) provides for 1,039 homes as part of a comprehensively planned, mixed use development. 2.3 The number of homes consented can no longer be delivered within the area subject to that permission. There are two reasons for this: 1. The outline application proposals (W1/08-0613) assumed 260 homes at South Quay. However, the subsequent planning permission of 2012 (PA10/08142) for a foodstore (which opened in 2014) provides for only 30 homes on that part of the site. The housing capacity of South Quay has therefore reduced by 230 homes. 2. The housing densities assumed as part of the outline application proposals for the remainder of the site (including North Quay, Hilltop and Riviere Fields) are significantly higher than those likely to be delivered. Those assumed densities were driven by a now-superseded planning policy regime (PPS3) that required minimum and relatively high densities. In	Much of this is a matter for CC and the Site Allocation DPD. The site in question is covered by NP policy NE1. The developability issue of para. 2.5 is addressed at 50a	The NPSG agrees that these comments should have been addressed to Cornwall Council. We do not agree that viability of a previously consented scheme outweighs the strong support received for the draft policies during the consultation phases of the Neighbourhood Plan. The proposals significantly affect the issues of separating the village of Phillack from surrounding growth. The issue of additional vehicle traffic through Phillack is also likely to make the development impractical.

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		<p>addition, a more thorough design exercise beyond the outline master plan indicates that in order to respond appropriately to heritage matters within and immediately adjacent to the World Heritage Site, and on a pragmatic level to accommodate the necessary car parking required for a scheme of this nature, it is clear that the site does not have the capacity to accommodate the number of homes consented. Consequently, the housing capacity of North Quay, Hilltop and Riviere Fields is likely to reduce by around 300 homes.</p> <p>2.4 In total, therefore, the housing capacity of the consented Hayle Harbour redevelopment is likely to be at least around 500 homes short of the number originally provided for (1,039) through the outline permission (W1/08-0613 and PA13/0370).</p> <p>2.5 The area immediately to the north east of the consented Hayle Harbour redevelopment presents the opportunity to mitigate the adverse socio-economic consequences of that reduction in housing capacity at Hayle Harbour, by providing for residential development on land in the same ownership as the consented area, maximising proximity to the harbour area and thereby stimulating the vibrancy and success of the wider redevelopment scheme.</p> <p>2.6 Importantly, development can be accommodated within that area in a manner which would enable the separate identity and distinctive character of Phillack to be retained in perpetuity, while also conserving other local heritage assets including the listed buildings at Riviere Farm and the setting of the World Heritage Site. Figure 2 indicates in broad terms how the consented Hayle Harbour redevelopment could be expanded in this direction while enabling these important environmental objectives to be achieved. That plan highlights the potential for delivering new recreational facilities, such as parkland and allotments, within the area that would remain open in perpetuity between the expanded harbour development and Phillack. As part of a comprehensive strategy for that area and subject to further investigation, there is the possibility that the overhead electricity transmission lines across this area could be buried underground, giving rise to visual and amenity benefits.</p>		
26	S Marsden TR27 4RD 11 Jul 17	<p><b>Policy SD1</b> If my reading is correct, there exist at present 4056 dwellings within the defined area. There is then provision for a further 1600 dwellings by the year 2030. This represents a period of only 12½ years for a 39.45% increase. Has any study been done or planned to establish whether the existing utility infrastructure can cope with this and, if not, what steps will need to be taken to increase capacity? I would make the same comment in respect of social infrastructure such as schools and medical services: has any study been conducted to ascertain whether the existing services are sufficient? If not, where would additional institutions and facilities be located within the defined area?</p>	The LPA is obliged to take the infrastructure needs and constraints into account when approving new development. Infrastructure needs are considered in the DPD.	The LPA is obliged to take the infrastructure needs and constraints into account when approving new development. Infrastructure needs are considered in the DPD.
26b		<p><b>Policy SD1</b> Has any thought been given to the introduction as policy of a ban on new builds being used as second homes in the same way as this has been implemented in St. Ives?</p>	Was this discussed.	NPSG discussed this early in the process following publicity of the St Ives initiative. The NPSG felt that the circumstances in St Ives were very different from Hayle, namely very high prices in the town and little space for development. Hayle has a 6-8% second home rate and, although this has some impact on house prices, it is not unduly high. If a restriction on second homes was instituted, the NPSG felt that the incentive to build new dwellings, which would provide 30% affordable units, would be reduced. No comments were made during the prior consultations.
27	S Marsden TR27 4RD	<b>Policy SD1 (page 24)</b>	Supports policy – does not require any policy change require or provide new 'evidence' to add to supporting text	No specific action required.

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	11 Jul 17	<i>Having lived in a town, where poor surveying has resulted in new developments causing extensive flooding from run-off, I would look for stringent requirements in this respect especially on hills.</i>		
28	DLA on behalf of Sennybridge (Hayle) 2 Aug 17	<b>Policy SD1</b> <i>2.8 Map 3 Built-up Area Boundaries should be amended to include the full extent of the built-up area of Hayle, notably those residential properties off Carnsew Road which are currently excluded which form part of the built-up area. The revised boundary to the Built-up Area Boundaries is illustrated in Figure 3.</i>	A review of the BUAB in conjunction with the LPA is appropriate	See 24
29	DLA on behalf of Sennybridge (Hayle) 2 Aug 17	<b>Policy SD1</b> <i>2.7 It is therefore essential that the area immediately to the north east of the consented Hayle Harbour redevelopment, is allocated by Cornwall Council through their Site Allocations Development Plan Document (DPD). Separate representations have been submitted to Cornwall Council in relation to their Site Allocations DPD.</i>	This is a matter for the LPA	No specific action required.
30	Savills on behalf of the Truro Diocesan Board of Finance 4 Aug 17	<b>Policy SD1</b> <i>In relation to housing policies, Policy SD1 sets out the built-up area within the Neighbourhood Plan area within which the principle of development is supported. The built-up area represents the preferred location for new, small scale development sites whilst recognising that sites for additional 'strategic' housing development may need to be allocated contiguous to this boundary.</i> <b>Whilst the Diocese's land has been omitted from the built up area defined on Map 3 of the HNP, the Diocese is supportive of this policy as it makes provision for housing development allocated adjacent to the boundary which is considered to be more in line with strategic objectives of the adopted Cornwall Local Plan and the guiding principles of the Framework, namely to promote sustainable development, avoid new isolated new homes and locate new development where it will where it will enhance or maintain the vitality of rural communities.</b>	This statement is in support of the current Policy SD1 but the Respondent's position could be affected by any review and alterations of the BUAB. It is clearly the intention of the TDBF to seek approval for residential development.	The NPSG feels strongly that the Local Gap defined in this area is vital to maintain the integrity of the historic village of Phillack. Strong support was received during consultations.
31	DLA on behalf of Sennybridge (Hayle) 2 Aug 17	<b>Policy SD2</b> <i>2.9 Policy SD2 as currently proposed is unreasonably restrictive in relation to residential density and the provision of open green space for sites allocated through the Cornwall Site Allocations Development Plan Document. Policy SD2 does not reflect the varied landscape and historical character of Hayle, which requires a varied response when proposing new development, rather than a 'one size fits all' approach.</i>	Criteria (i) allows for variety in density Criteria (ii) as a statement of fact rather than criteria could be deleted Criteria (iv) requires public open space provision to meet the up-to-date standards of the LPA. This is a reasonable position to take – (although as the LP already deals with criteria (iv), it could be considered superfluous)	ii) deleted.
32	DLA on behalf of Sennybridge (Hayle) 2 Aug 17	<b>Policy SD2</b> <i>2.10 Policy SD2(ii) should be amended to remove reference to a ceiling residential density, in order to provide greater flexibility in design responses, including to reflect that in certain locations such as North Quay, densities well above 35 dwellings per hectare are appropriate and indeed have already been permitted through the planning process</i>	Criteria (ii) as a statement of fact rather than criteria could be deleted	ii) deleted.
33	DLA on behalf of Sennybridge (Hayle) 2 Aug 17	<b>Policy SD2</b> <i>2.11 Policy SD2(iv) should also be amended to remove reference to the need for the provision of open green space within new residential development in every case. While the provision of public amenity space is supported as a high level principle, in certain locations it would not be appropriate to provide open green space. For instance, North Quay does not contain open green space as part of the outline consent for Hayle Harbour (W1/08-0613 and PA13/01370), for reasons of the Quayside being long established historically as the focus for commercial harbour activity within the town, rather than a natural environment typified by open spaces. This view is</i>	The criteria could be prefaced with "unless it can be shown not to be possible or necessary,....."	Changed to public open space.

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		<i>supported by heritage stakeholders who have been engaged in discussions about the development proposals for North Quay.</i>		
34	DLA on behalf of Sennybridge (Hayle) 2 Aug 17	<b>Policy SD2</b> 2.12 Policy SD2(vii) should be amended to provide greater flexibility in ensuring reasonable walking distance to a bus service of no further than 400m. As endorsed in best practice urban design guidance, this indicative standard is supported as a high-level principle. However, Policy SD2(vii) should recognise that it might not always be possible to achieve this standard for all new residential dwellings, factoring in local site circumstances and the overall balance of planning considerations.	Suggest delete "(of no farther than 400m)" and revise criteria to read "wherever possible, including ensuring reasonable walking distances to a bus services". Insisting on 400m could be seen as being unreasonable as the bus routes are not at the behest of developer. 400m could be included as an aim in the supporting text.	Done
35	Lichfields for Bourne Leisure 5 Aug 17	<b>Policy: SD2 – Design and Layout of Residential Development, Support with Comment:</b> Draft Policy SD2 provides a list of criteria to which all new residential development should adhere. Bourne Leisure is concerned that the criteria in this policy does not provide explicit protection for amenity, nor does it take into account impact of housing on adjacent land uses. It is Bourne Leisure's view that amenity and that of other adjacent land uses should not be put at risk by new development. Bourne Leisure considers that the Neighbourhood Plan should ensure that proposed new development does not create any harmful impacts on amenity and adjacent land uses. Failure to include such a criterion risks unacceptable impact for example on the local tourism industry, such that the public may be deterred from visiting or returning to the area, which will consequently have wider implications for the local economy as a whole. Bourne Leisure therefore requests that the following additional criterion is added to draft Policy SD2: <b>"that there are no adverse impacts on the amenity of nearby or adjacent land uses."</b>	It seems reasonable to include an additional criteria. You could accept Lichfield's suggested change.	Following discussion it was agreed to make no change.
36	Planning Policy Cornwall Council 1 Aug 17	<b>Policy SD2</b> The maximum density of 30 could be too restrictive. The DPD uses an average of 35 dph assumption for the urban extension so the 30 dph would be better expressed as a range.	CC is right. See 31 regarding density	Reference removed.
37	Planning Policy Cornwall Council 1 Aug 17	<b>Policy SD2</b> vii) is this achievable? Not sure the 400m would be achievable in all instances, could this be drafted more flexibly – as a guide	See 34 regarding bus routes	Done
38	Planning Cornwall Council 1 Aug 17	<b>Policy SD3</b> Is this within the settlement boundary only? Supporting text - <b>the right to buy has not been reintroduced.</b> the govt has expanded the provisions for the right to acquire housing association stock, but this is not a great risk to our affordable housing stock. Suggest removing this statement.	The RTB scheme was extended in 2016 not reintroduced. Either amend sentence or delete as CC suggests.  The current policy doesn't do much in planning terms.	Done
39	DLA on behalf of Sennybridge (Hayle) 2 Aug 17	<b>Policy SD4</b> 2.13 Policy SD4 reflects the high-level principles of Cornwall Local Plan Policy 13, which is supported. However, Policy SD4 should be amended to reflect and reference Cornwall Council's specific parking guidelines (maximum standards) <sup>1</sup>	Hayle has a parking issue. The SG has determined that the standards are insufficient. The CC guidelines says "the evidence indicates that reducing residential parking levels does not lead to the desired outcome of reduced car use..." Evidence will be the key (see 42)	No change
40	DLA on behalf of Sennybridge (Hayle) 2 Aug 17	<b>Policy SD4</b> 2.14 Cornwall Council's parking guidelines do not specify the need for parking to be provided on-street specifically, or indeed to visitor car parking. The quantitative standards also differ to those of Cornwall Council's parking guidelines.	CC says good practice includes 2. There is no single best solution to providing car parking – a combination of on-plot, off-plot and on-street will often be appropriate; 3. The street can provide a very good car park – on-street parking is efficient, understandable and can increase vitality and safety;	No change

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41	DLA on behalf of Sennybridge (Hayle) 2 Aug 17	<b>Policy SD4</b> 2.15 The parking guidelines specify the following standards in relation to housing: "Housing 1 sp/unit where highly accessible 2 spaces/unit elsewhere 1½ spaces/unit not to be exceeded overall in larger developments"	Current policy has some flexibility i.e. "Proposals for residential development with parking provision of fewer parking spaces per dwelling than the above will only be permitted if:....."	No change
42	DLA on behalf of Sennybridge (Hayle) 2 Aug 17	<b>Policy SD4</b> 2.16 Policy SD4 as currently drafted does not accord with the Cornwall Local Plan and its supporting evidence base, and should be revised accordingly.	Isn't this the same standard as St Ives? SG should consider whether its local evidence is sufficiently strong and justified.	No change
43	Lichfields for Bourne Leisure 5 Aug 17	<b>Policy: SD4</b> Support: Bourne Leisure endorses draft policy SD4, as it allows parking provision to be considered on a case-by-case basis, taking into account the characteristics of the proposal. The Company considers this to be a reasonable and appropriate means of assessing the scale of parking provision for non-residential forms of development.	This comment recognises that the policy does have an element of flexibility.	No specific action required.
44	DLA on behalf of Sennybridge (Hayle) 2 Aug 17	<b>Policy SD6</b> 2.17 Policy SD6 should echo the provisions of Policy SD2 by including the following additional text: "Where meeting the open space provision standard is not feasible, viable or appropriate, in proportion to the scale of the proposal, proposals will be required to make a contribution to off-site provision where provisions are not already subject to the Community Infrastructure Levy". 2.18 While the provision of public amenity space is supported as a high-level principle, in certain locations it would not be appropriate to provide open green space, as set out more fully in our response to Policy SD2 above.	The current policy already recognises that there may be alternative facilities nearby or open space on site may not be possible. In this case it seeks an alternative contribution. Perhaps the second para. could be clarified i.e. "Where there is access to alternative facilities, or the scale of the development will not allow for on-site provision, contributions commensurate with the size of the scheme, may be required through a planning obligation or CIL as appropriate."	The reduced list of 10 items will be retained.
45	Environment Services Cornwall Council 1 Aug 17	<b>Policy SD6</b> The National Planning Policy Framework 2012 (para 73) requires that planning policies should be based on robust & up to date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. In July 2014 Cornwall Council adopted the Open Space Strategy for Larger Towns in Cornwall as interim planning guidance pending the adoption of the Local Plan. Hayle is one of the study areas and it has recently been reviewed and the latest standards therefore apply. It will now be taken forward as a Supplementary Planning Document (SPD) – for further details see <a href="http://www.cornwall.gov.uk/environment-and-planning/parks-and-open-spaces/open-space-strategy-standards">http://www.cornwall.gov.uk/environment-and-planning/parks-and-open-spaces/open-space-strategy-standards</a> . The above strategy specifies provision standards and policies for delivering open spaces, including quantities of six different essential types of open space, design requirements and minimum accessible distance thresholds. The NDP document refers to the latest summary comparison of provision at paragraphs 2.16, 3.14/5. <b>The table at page 34 is however taken from the 2014 version, and we would recommend the replacement with the latest draft table which reflects a more up to date understanding, including the increased Local Plan housing allocation of 1600 dwellings. This would apply also to the figures in Policy SD6, and using the up to date figures will better support Policy SD2(iv) also.</b>	Up-date reference and figures relating to policy SD6 as suggested.	The reduced list of 10 items will be retained.
46	Planning Cornwall Council 1 Aug 17	<b>Policy SD6</b> see comments from open space officer	See 45	
47	S Marsden TR27 4RD 11 Jul 17	<b>Policy SD7</b> Cemeteries: 'assumes no increase within town study boundary'. Why? Future quantity provision of 1.66 m2/person: where?	This is a CC working assumption as part of its strategic infrastructure needs. Any site will likely, but not necessarily, be outside the BUAB. There is no policy in the NP specifically about future cemetery provision. Presumably it's not an issue?	No specific action required.



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48	Environment Services Cornwall Council 1 Aug 17	<b>Policy SD7</b> <i>There is insufficient information to substantiate the list of parcels of land to be protected as Local Greenspace. Whilst the public response to the surveys indeed indicates the importance of open space to local residents, this will arguably apply to the larger, key strategic open spaces more so. The NDP and its accompanying Environmental Report, have not distinguished how the need to protect was determined for the small area, but would not apply to the spaces such as Hayle Recreation Ground, Ellis Park, the Millpond, the Black Rd Nature Reserve and King George Memorial Walk. The list includes incidental areas of landscaped space too small to provide a real recreational function, whilst the open space assessment establishes that there is high quantity provision of type 1 (parks/amenity) open space over 1000sqm in the town already. Policy SD7 does not demonstrate how each specific site is special to a local community and holds a particular local significance, e.g. because of its beauty, historic significance, recreational value, tranquillity or richness of its wildlife. Consequently, the National Planning Policy Framework paragraph 74 would not support the protection of a small incidental open space of this type, without some additional evidence in favour of its protection such as an analysis of quality &amp; accessibility provision in the area. We would recommend that this be carried out individually for each site identified for local greenspace protection, using the relevant adopted open space standards. This sort of exercise was undertaken by the NDP group for Falmouth.</i>	As the number and value of some of the proposed LGS has been questioned it would be prudent to carry out a more formal analysis and present the evidence in the form of a Site Assessment Report and refer to its conclusions and subsequent designations in the supporting text to SD7. A template will be provided for this report.	The reduced list of 8 items will be retained.
49	Planning Cornwall Council 1 Aug 17	<b>Policy SD7</b> <i>map may need to be improved - it's hard to see</i>	All maps need to be at a high enough definition to enlarge electronically so precise boundaries and lines can be understood	This has been done.
<b>NATURAL ENVIRONMENT (NE)</b>				
50	Cornwall Seal Group 9 Jun 17	<b>Environment - General</b> <i>Good to see the plan reflecting the county's Environmental Growth Policy through the references to the aspiration of biodiversity and environmental gains. Well done for all the hard work that has gone into the plan.</i>	No specific action required	No specific action required.
50A	DLA on behalf of Sennybridge (Hayle) 2 Aug 17	<b>Policy NE1</b> <i>2.5 The area immediately to the north east of the consented Hayle Harbour redevelopment presents the opportunity to mitigate the adverse socio-economic consequences of that reduction in housing capacity at Hayle Harbour, by providing for residential development on land in the same ownership as the consented area, maximising proximity to the harbour area and thereby stimulating the vibrancy and success of the wider redevelopment scheme. 2.6 Importantly, development can be accommodated within that area in a manner which would enable the separate identity and distinctive character of Phillack to be retained in perpetuity, while also conserving other local heritage assets including the listed buildings at Riviere Farm and the setting of the World Heritage Site. Figure 2 indicates in broad terms how the consented Hayle Harbour redevelopment could be expanded in this direction while enabling these important environmental objectives to be achieved. That plan highlights the potential for delivering new recreational facilities, such as parkland and allotments, within the area that would remain open in perpetuity between the expanded harbour development and Phillack. As part of a comprehensive strategy for that area and subject to further investigation, there is the possibility that the overhead electricity transmission lines across this area could be buried underground, giving rise to visual and amenity benefits.</i>	The boundary of (a) on Map 8 is consistent with the boundary of the site outlined in the comment (in W1/08-0613 and PA13/01370) and does not encroach into these consented development sites. No change is required to the map. While the number of homes originally consented may not be now deliverable, the comments reflect a desire to amend the boundary of (a) simply to accommodate a revised proposal, at the moment aspirational. Site allocations are being dealt with by the Cornwall Site Allocations DPD and the land adjacent to the consented site and within (a) is not, as far as we are aware, identified in that DPD. The policy designation is based not on ownership of land but land use and priority for the spatial strategy of the use of the land in and around Hayle. Much of the land in (a) is owned by Sennybridge and continued development to the east of the consented site will seriously start to erode the gap, a critical part of which lies immediately adjacent to the consented site. Without certainty or guarantees relating to the suggestions of how a gap could be preserved and protected if development extends to the east of the current consented site, there is a reluctance to alter the proposed boundary of the gap to accommodate the suggested development area. There is no guarantee that the suggested	No action

	FROM	COMMENT	CONSULTANTS' COMMENTS	NPSG NOTES
			recreation / open space would come forward in a future proposal to act as a b buffer or gap. No change is therefore required to the boundary of (a) on map 8. N.B. Areas designated on map 8 should be labelled consistently with the policy names to remove uncertainty and the avoidance of doubt.	
51	DLA on behalf of Sennybridge (Hayle) 2 Aug 17	<b>Policy NE1</b> <i>2.19 Map 8 (Local Gaps) and the boundaries of local green gap (a) should be amended, for land between Phillack and north east of Hayle and Riviere Towans, which adjoin the Hayle Harbour redevelopment (W1/08-0613 and PA13/01370), which provides for 1,039 homes as part of a comprehensively planned, mixed use development.</i>		No change.
52	DLA on behalf of Sennybridge (Hayle) 2 Aug 17	<b>Policy NE1</b> <i>2.20 The number of homes consented can no longer be delivered within the area subject to that permission (see response to Policy SD1 above and Figure 2).</i>		No change.
53	DLA on behalf of Sennybridge (Hayle) 2 Aug 17	<b>Policy NE1</b> <i>2.21 We therefore propose that the boundaries of local green gap (a) between Phillack and north east of Hayle and Riviere Towans be amended to enable housing development on parts of these sites to come forward, while still enabling the separate identity and distinctive character of Phillack to be retained in perpetuity, principally through the designation of public open space along the south western boundary of the built-up area of Phillack</i>		No change.
54	Savills on behalf of the Truro Diocesan Board of Finance 4 Aug 17	<b>Policy NE1</b> <i>The policy identifies a number of areas within Hayle which are proposed to provide separation of towns and villages and provide legibility of important heritage features. Included among this is the Diocese's land north of Glebe Row and east of Springfield Close. It is our understanding that the proposed designation is to prevent the coalescence between settlements, allowing each settlement to maintain their separate identity and setting. The proposed policy draws on the principles of Policy TV2 from the old Penwith Local Plan which was used to provide green space to prevent these areas growing together. Additionally, the Framework makes provisions for the designations of green spaces. Paragraph 77 also explains that these types of designations will not be suitable for most open spaces. It outlines the following specific circumstances;</i> · Where the green space is in reasonably close proximity to the community it serves; · Where the green area is demonstrably special to a local community and holds a particular local	The supporting text to policy NE1 sets out the reasoning behind the identification and designation of local gaps. However, with the gaps being the focus of more than one comment, the evidence behind the identification of the gaps could perhaps be directly referenced through a link in a footnote from the supporting text. Reference to TV2 is probably not enough. Para 7.7 of the NPPF relates to the designation of Local Green Space (LGS). Policy NE1 does not designate LGSs. This is clear in the title of the policy, which is about local gaps. The respondent has misunderstood the policy. The local gap (a well-used principle, for example, in Local Plans) is a specific designation to protect existing settlements and prevent urban sprawl and coalescence. The local gap to which the respondent refers is set to protect Phillack from coalescence with Hayle and while a commitment in the comments to protect the allotments from development is welcomed, protecting this area of land on its own will not have the same effect as the local gap. Simply retaining the small allotment site at the northern end of the local gap area (and / or retaining the	

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		<p>significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and</p> <ul style="list-style-type: none"> <li>· Where the green area concerned is local in character and is not an extensive tract of land.</li> </ul> <p>The specific reasons for the designation of the Diocese's land remains unclear. As mentioned previously, the site is located centrally within the Phillack built form and is unconstrained from any statutory designations. It is considered that there is insufficient justification for the site's protection and the site does not meet the specific circumstances set out in paragraph 77 of the Framework and arguably therefore should not be subject to further protection that would prevent the site from coming forward for development. It is felt that the gap can be maintained by retaining the existing allotment site as this creates an effective barrier to coalescence. National Planning Practice Guidance (NPPG, ID 37-007-20140306), further emphasises that Local Green Space designations should not be used in a way that would undermine sustainable development, including the need to identify sufficient land to meet development needs. The current policy only allows for specific uses within these areas.</p> <p>In our view, the proposal to designate the Diocese's land as a strategic local gap would result in a firm restriction on the potential for future sustainable development on the site. Many of the strategic local gaps identified are also in areas where Policy SD1 would generally support, significantly limiting the number of strategic allocation options. As such, there seems to be an underlying conflict between the two policies which should be revisited.</p>	<p>larger allotment site adjacent to the church) will not prevent the gap from closing.</p> <p>No change to the Plan is therefore recommended in response to this comment.</p> <p>There is no underlying conflict between SD1 and NE1 where the local gaps are outside of the built-up area boundary. However, the designation of Ellis Park as a local gap is not consistent with NE1 and should be removed (it is already identified in / protected through policy NE7 of course).</p>	
55	Savills on behalf of the Truro Diocesan Board of Finance 4 Aug 17	<p><b>Policy NE1</b> <i>Summary</i> From the reasons identified above, the Diocese respectfully requests the Neighbourhood Steering Group to consider the comments made in this letter before advancing with the Neighbourhood Plan, together with sustainability credentials for the land North of Glebe Row for it has the potential to be developed into a high quality residential development. The site shown on the enclosed plan is suitable and deliverable as there are no statutory constraints to it contributing towards meeting the strategic needs of the Hayle area.</p> <p>The Diocese and its advisors would be pleased to initiate a conversation with the Neighbourhood Plan Steering Group and to take part, where appropriate, in any future consultations or stakeholder engagement.</p>		The NPSG voted to retain this area as a Local Gap.
56	Lichfields for Bourne Leisure 5 Aug 17	<p><b>Policy: NE1</b> <i>Support with Comment:</i> Bourne Leisure recognises in principle the need to maintain the integrity of settlements, through the prevention of coalescence or urban sprawl. The supporting text to draft Policy NE1 notes that proposals within local gaps "will only be supported for uses or development which are essential because of their location or need on the site proposed". This supporting text supports, in principle, development that is essential because of its location or a need on the site, but this approach is not reflected within the draft policy itself.</p> <p>Riviere Sands Holiday Park, as with many of Bourne Leisure's sites, is located in a coastal area and has a close functional and visual relationship with the countryside and the sea. One of the Company's overriding aims is to continually improve the quality of its visitor accommodation and facilities to maintain a product that meets customers' expectations. This may include expansion of existing sites in some circumstances, e.g. to facilitate the</p>	<p>The comment made are acknowledged and the Plan recognises the key role played by tourism in the local economy. However, the Plan has to recognise that for quality of Hayle to be maintained overall, for visitors, businesses and residents, a balance has to be struck between supporting local tourism based businesses and ensuring that Hayle itself maintains quality into the future. Therefore, while it is accepted that quality of the tourism offer is important in Hayle, expansion of development into areas which compromise the high quality setting of Hayle and Phillack (and therefore high quality offer of the area as a whole and a key reason why tourists come) are not considered to be acceptable. The local gap at Phillack does not extend all of the way to the boundary of Riviere Sands Holiday Park, which reflects clearly that the policy and gap is not about restricting or restraining sustainable tourism development but about preventing coalescence.</p>	<p>The comment made are acknowledged and the Plan recognises the key role played by tourism in the local economy. However, the Plan has to recognise that for the quality of Hayle to be maintained overall, for visitors, businesses and residents, a balance has to be struck between supporting local tourism-based businesses and ensuring that Hayle itself maintains quality into the future. Even where the quality of the tourism offer is high, expansion of development into areas which compromise the high-quality setting of Hayle and Phillack (and therefore the quality of the area as a whole and a key reason why tourists come) are not considered to be acceptable. The local gap at Phillack does not extend all of the way to the boundary of Riviere Sands Holiday Park, which reflects clearly that the policy and gap is not about restricting or restraining sustainable tourism development but about preventing coalescence.</p> <p>No change to the Plan is therefore recommended in response to this comment.</p>

	FROM	COMMENT	CONSULTANTS' COMMENTS	NPSG NOTES
		<p>provision of new facilities or accommodation to meet higher amenity standards, whilst taking into account the specific environmental constraints imposed by a site's location and nature designations.</p> <p>A lack of investment would result in a stagnating offer which would attract fewer visitors, and therefore, falling income. This harmful outcome for the Company would, in turn, have wider detrimental effects on the local economy of any one site (e.g. reduced levels of employment and less local spending).</p> <p>The Company is concerned therefore that draft Policy NE1 does not take account of the requirements, nor patterns of development of the tourism industry, as a major generator of local employment. It is necessary that planning policies recognise this role and support the growth of tourism via promoting new developments - often located in coastal areas and /or visible from the coast - to respond to the changing demands and needs of the sector and in order to promote economic growth.</p> <p>Bourne Leisure therefore considers that it is important that draft Policy NE1 supports developments in a local green gap that are essential because of their location and/ or need, and where any adverse impact can be suitably mitigated.</p> <p>Bourne Leisure therefore requests that the following text is added within draft Policy NE1:</p> <p>To ensure that Phillack and Angarrack maintain their separate identity, setting in the landscape and local built character and extent, a local green gap (as identified on Map 8) will be maintained to prevent coalescence between:</p> <p>a) Phillack and north east of Hayle and Riviere Towans;  b) Angarrack and the east of Hayle and Marsh Lane employment area; and  c) Foundry and developments to the south and west.</p> <p>Proposals for development will only be supported where they:</p> <p>i) are for measures to prevent coastal erosion or flooding; or,  ii) propose improvements to access to the countryside; or,  iii) are for essential agricultural uses; or <del>and</del>,  iv) <u>are essential because of their location and/ or need; and</u>  v) <del>do not compromise the</del> <u>considers the impact upon visual openness and landscape character of the gap; and,</u>  vi) <del>do not compromise</del> the character or setting of important international, national and local heritage assets;</p> <p><b>[proposed amendments underlined]</b></p>	No change to the Plan is therefore recommended in response to this comment.	
57	DLA on behalf of Sennybridge (Hayle) 2 Aug 17	<p><b>Policy NE2</b></p> <p>2.22 Policy NE2 should be split into two separate policies, relating to i) development within and around Riviere Towans; and ii) the remaining undeveloped coastal area.</p>	<p>Policy NE5 deals with development at Riviere Towans. Arguably, Riviere Towans does not form part of the undeveloped coast (it is still "development") and could therefore be excluded from the designation based on the definition in the Local Plan. However, if this is considered appropriate, there could also be a case for also excluding holiday sites such as Riviere Sands. Map 9 should be amended to take these issues into account.</p>	Map 9 amended
58	DLA on behalf of Sennybridge (Hayle) 2 Aug 17	<p><b>Policy NE2</b></p> <p>2.23 Map 9 (Undeveloped Coastal Areas) and the boundaries of the Towans Character Area should be amended, to exclude the area immediately to the north east of the outline-consented Hayle Harbour redevelopment (W1/08-0613), the built-up area of Riviere Towans and reflecting the revised boundaries of local green gap (a) between Phillack and north east of Hayle and Riviere Towans.</p> <p>2.24 The revised boundary to the Towans Character Area is illustrated in Figure 4.</p>	Support noted.	Map amended

	FROM	COMMENT	CONSULTANTS' COMMENTS	NPSG NOTES
59	Lichfields for Bourne Leisure 5 Aug 17	<b>Policy: NE2</b> <i>Support</i> <i>Bourne Leisure endorses the approach taken in draft Policy NE2, as it allows for development on the natural undeveloped coastal areas where the proposal is for the improvement of an existing built facility and enhances the quality and appearance of the facility in relation to the coastal landscape and seascape.</i>	Support noted.	No specific action required.
60	Lichfields for Bourne Leisure 5 Aug 17	<b>Policy: NE3</b> <i>Support</i> <i>Bourne Leisure supports the approach taken in draft Policy NE3, as it will ensure that suitable and sustainable development proposals would not be prevented from coming forward where they include appropriate and achievable mitigation measures which minimise harm on the natural environment.</i>	Support noted.	No specific action required.
61	G Egan TR27 5AF 7 Jul 17	<b>Policy NE4</b> <i>Public access to Hayle's unique beach environment is important, but any access planning must take into account the symbiotic relationship between the beach and dunes. I endorse the plan's focus upon existing rights of way rather than creating new and additional routes, but the overuse of some current access points are leading to significant dune erosion via human activity to the detriment of both the beach and dunes. Improvements to public access, especially linking Hayle Harbour/Harvey Towans with the beach will require engineering and construction systems which provide safe access for able-bodied and disabled whilst simultaneously protecting the stability of the dunes and its vital interaction with the beach.</i>	Supports policy – does not require any policy change require or provide new 'evidence' to add to supporting text	No specific action required.
62	Planning Cornwall Council 1 Aug 17	<b>Policy NE4</b> <i>May not need planning permission?</i>	Comment noted. The policy could clarify that it only applies to proposals requiring planning permission although the policy would only be used where proposals do require a planning application. It is understood that most such proposals will not.	No specific action required.
63	C Polkinghorne Hayle Cricket Club 15 Jun 17 16 Jun 17	<b>Policy NE5</b> <i>I have recently thoroughly inspected the Neighbourhood Plan and feel that the ownership of land given to John by Rivière Estates on a map is incorrect. Basically, part of the land they are claiming as theirs is actually ours. I believe the map No.9 on page 56 is different and incorrect in relation to the rough land to the West of the pavilion.</i>	Check and correct map if necessary	Map corrected.
64	Lichfields for Bourne Leisure 5 Aug 17	<b>Policy: NE5</b> <i>Support with Comment:</i> <i>Bourne Leisure has no objection to draft Policy NE5, in principle. Indeed, one of Bourne Leisure's own overriding aims is to continually improve the quality of their visitor accommodation and facilities to maintain a product that meets customer's expectations. As referred to above, a lack of investment would result in a stagnating offer which would attract fewer visitors, and therefore, falling income. This harmful outcome would, in turn, have wider detrimental effects on the local economy (i.e. reduced employment and local spending).</i> <i>Bourne Leisure has considerable experience in developing and delivering masterplans for the enhancement of its sites, which ensures that such development has no adverse impact on the wider environment and in particular adjacent land uses.</i> <i>Bourne Leisure therefore requests that the following additional criterion is added to draft Policy NE5:</i> <i>"Proposals for replacement chalets, or small extensions, on the Riviere Towans chalet site shown on Map 10 will be permitted where they:</i>	Support noted. Additional criteria considered acceptable and could be included in a revised policy.	Following discussion, no amendment will be made.

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		<p>i) do not increase the total footprint of the chalet to more than 63.17m<sup>2</sup> (680ft<sup>2</sup>), this includes any exterior finishes i.e. cladding or render;</p> <p>ii) are of a single storey design (except for existing two storey chalets), which is in keeping with the traditional character and topography of the site;</p> <p>iii) do not result in a disproportionate increase in the ridge height;</p> <p>iv) are finished in pastel or neutral colours;</p> <p>v) have no significant impact on the existing and essential built character of the site;</p> <p>vi) are for holiday chalet accommodation with non-permanent residence; and,</p> <p>vii) avoid any significant negative impact on:</p> <p>a) the biodiversity, landscape and setting of the site;</p> <p>b) the Gwithian Towans to Mexico Towans SSSI; and,</p> <p>c) Hayle Estuary &amp; Carrack Gladden SSSI; and,</p> <p>d) the Hayle Dune County Wildlife Site; and,</p> <p><u>f) adjacent land uses</u></p> <p>Where some impact is unavoidable, it will be satisfactorily mitigated. Proposals for additional new chalets will not be supported. The relocation of a chalet will be permitted subject to making good of the existing site and compliance with clauses (i) to (vii) above.  <b>[proposed amendments underlined]</b></p>		
65	Planning Cornwall Council 1 Aug 17	<p><b>Policy NE5</b> I see this comes from the chalet guidelines, but is it a reasonable policy?</p>	It is difficult to second guess the respondent's concerns. It would be helpful for Cornwall Council to support their comment with alternative wording or a suggestion if the answer to their question is "no".	Cornwall Council now supports this policy. It was also noted that the chalet camp residents voted to support their existing policies which are similar to the NP.
66	D Jarvis TR27 5AZ 5 Jun 17	<p><b>Policy NE6</b> Can anything be done with the abandoned buildings near the camp site entrance?</p>	Refer to Town Council	No specific action required.
67	Planning Cornwall Council 1 Aug 17	<p><b>Policy NE6</b> Have the alternatives been adequately assessed through SEA?</p>	The SEA is underway and the policy has been tested.	Under discussion with NE
68	DLA on behalf of Sennybridge (Hayle) 2 Aug 17	<p><b>Policy NE7</b> 2.25 Map 12 (Green Infrastructure) and the boundaries of green infrastructure asset (vi) West of Phillack; and (vii) Phillack – Churchtown Road; should be amended, as detailed in our response to Policy NE1 Local Gaps.</p> <p>2.26 The area immediately to the north east of the consented Hayle Harbour redevelopment presents the opportunity to mitigate the adverse socio-economic consequences of that reduction in housing capacity at Hayle Harbour, by providing for residential development on land in the same ownership as the consented area, maximising proximity to the harbour area and thereby stimulating the vibrancy and success of the wider redevelopment scheme (see paras. 2.1 - 2.6 above).</p> <p>2.27 Importantly, development can be accommodated within that area in a manner which would enable the separate identity and distinctive character of Phillack to be retained in perpetuity, while also conserving other local heritage assets including the listed buildings at Riviere Farm and the setting of the World Heritage Site.</p>	See response to NE1 (comments 51 – 54).	See response to NE1 (comments 51 – 54).
69	DLA on behalf of Sennybridge (Hayle) 2 Aug 17	<p><b>Policy NE7</b> 2.28 The revised boundary to Map 12 is illustrated in Figure 5. Figure 2 indicates in broad terms how the consented Hayle Harbour redevelopment could be expanded in this direction while providing the potential for delivering new recreational facilities, such as parkland and allotments,</p>		See response to NE1 (comments 51 – 54).

	FROM	COMMENT	CONSULTANTS' COMMENTS	NPSG NOTES
		<i>within the area that would remain open in perpetuity between the expanded harbour development and Phillack. The expansion of Hayle Harbour would provide important socio-economic benefits including the provision of new open space which would be publicly accessible, in perpetuity, to existing and new residents.</i>		
70	Lichfields for Bourne Leisure 5 Aug 17	<b>Policy: NE7</b> <b>Support:</b> <i>Bourne Leisure supports draft Policy NE7 as it allows for development that is necessary for the continuation or enhancement of established uses for recreation and leisure and recognises that developments will be acceptable where they include measures to mitigate loss, and the enhancement of the overall connectivity of green infrastructure in the area. This approach should help ensure the continuance and / or enhancement of established uses for recreation and leisure development, where they include appropriate and achievable mitigation measures that minimise any potential harm on the environment. This should, in turn, have a positive impact on the local economy through the provision of employment and expenditure by visitors.</i>	Support noted.	No specific action required.
71	Environment Services Cornwall Council 1 Aug 17	<b>Policy NE7</b> <i>Policy NE7 seeks to protect green infrastructure, much of which are strategic open spaces. In most cases this policy mirrors the requirements of NPPF para 74, however there is insufficient evidence to support (iv) West of Phillack and parts of (x) described as Lethlean Cemetery, but in agricultural use. Map 12 is somewhat misleading, as it ignores sizeable sites of significant wildlife value and accessible green infrastructure in the area. It should be noted that no open space assessment has been undertaken for the rural area to the south of Wheal Alfred Farm. However, due to the dispersed and low population, one would be unlikely to result in usable conclusions.</i>	It could be beneficial to reconsider the policy. Smaller, accessible greenspace which passes LGS criteria in NPPF para 77 could be designated as LGS. Such spaces could be subject to the further Site Assessment suggested at comment 48. West of Phillack, Churchtown Road and Lethlean Cemeteries are all also local gaps and therefore additional designation as GI is probably not going to be necessary.	
72	Planning Cornwall Council 1 Aug 17	<b>Policy NE7</b> <i>Identify as Local green space? See also Open Space Officer comments</i>	Some areas may qualify as LGS, others (e.g. extensive tracts of land) may not. Also see comments above re comment 71 and proposal at 48.	
73	DLA on behalf of Sennybridge (Hayle) 2 Aug 17	<i>2.29 The amendments made to Policy NE10 following the representations made to the 'Hayle Neighbourhood Plan Policies - First Consultation' document are noted and welcomed. Policy NE10 now more closely reflects the provisions of the NPPF (para. 112).</i>	No further action required.	No specific action required.
74	Lichfields for Bourne Leisure 5 Aug 17	<b>Policy: NE10</b> <b>Support:</b> <i>Bourne Leisure supports the principle underlying draft Policy NE10 as it recognises that there may be instances where the importance of a proposed development outweighs the need to protect areas of higher quality land, where there is no practicable alternative. This should help to ensure that new development that is necessary in that particular location and which will have a positive impact, comes forward.</i>	Support noted.	No specific action required.
75	Planning Cornwall Council 1 Aug 17	<b>Policy NE10</b> <i>This is covered by Cornwall Local Plan Policy 21</i>	Comment noted. Policy currently adds little to Local Plan policy 21. Could consider deleting subject to discussion with Cornwall Council about the possible added value of the second part of policy NE10.	
76	D Jarvis TR27 5AZ 5 Jun 17	<b>Policy NE11</b> <i>I would very much like to see included in this list the amazing panorama from the sand dunes and road to the car park at Sandy Acres as it has wide and far reaching views across the valley and open green space towards Gwinear, Connor Downs, Angarrack and its viaduct.</i>	Cannot comment on local views' inclusion or not.	Policy NE11 deleted

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77	J Daniel TR27 4HP 27 July 17	<b>Policy NE11 (oppose)</b> <i>Why spoil view of Phillack across Pool by building Fire and Police stations in inappropriate spot. Same applies to former Peugeot Garage Will planning permissions for North and South Quays be withdrawn in order to protect views to Lelant? Western approach to Hayle should be protected as well as views from Cricket Club. (support)</i>	The neighbourhood plan cannot require planning permission to be rescinded.  Last comment support noted.	Policy NE11 deleted
7578	Planning Cornwall Council 1 Aug 17	<b>Policy NE10</b> <i>This is covered by Cornwall Local Plan Policy 21</i>	Comment noted. Policy currently adds little to Local Plan policy 21. Could consider deleting subject to discussion with Cornwall Council about the possible added value of the second part of policy NE10.	
79	J Daniel TR27 4HP 27 July 17	<b>Policy NE12 (support)</b> <i>Walkway to southern side of Copperhouse Pool long overdue but why no mention of including Wilson's Pool (SSSI) in the leisure area linked to Recreation Ground?</i>	If Wilson's Pool is the pool to the west of Lethlean Lane (i.e. at the eastern end of Copperhouse Pool, it is part of the Hayle Estuary and Carrick Gladden SSSI.	No identified actions.
80	Cranford (Hayle LLP) 26 Jul 17	<b>Policy NE13</b> <i>Comment: Map 13, Page 64 – Land to the north of Marsh Lane which is in our client's ownership is shown as Grade 3b agricultural land. That designation is inappropriate to the land in question. It is not in agricultural use nor has it been for many years. It is rough semi improved grassland which was used for tipping from the A30 improvement works some years ago. It should not, as such, be shown as Grade 3b agricultural land.</i>	Grading is from Natural England/DEFRA data. The data may be out of date but is the latest available. The tipping of spoil on a site and the lack of agricultural use may not change the overall quality of the soil and there is no way of verifying the respondent's suggesting without detailed technical surveying.	Grading is from Natural England/DEFRA data. The data is the latest available. The tipping of spoil on a site and the lack of agricultural use may not change the overall quality of the soil and there is no way of verifying the respondent's comments without detailed technical surveying.
81	Cranford (Hayle LLP) 26 Jul 17	<b>Policy NE13</b> <i>Comment: Whilst we understand and acknowledge the objectives of Policy NE13 it should be noted and recognised in the text to Policy NE13 that the land to the north of Marsh Lane, which is designated as a County Wildlife Site and shown, as such, on Map 16, is subject to an extant planning consent for retail development the Hayle Retail Park. Part of the designated CWS will, as such, be subject to development and accordingly it would seem logical to redefine the extent of the CWS to exclude the land for which planning consent has been granted.</i>	The consent should be acknowledged in a footnote to the supporting text with reference to any information of relevance to the CWS land area in question highlighted – for example, does the decision notice specify any conditions on the approval such as mitigation? N.B. The notes to which the map refers should be made available to accompany its reproduction in the Plan – as an appendix or footnote or link.	Consent acknowledged.
82	DLA on behalf of Sennybridge (Hayle) 2 Aug 17	<b>Policy NE13</b> <i>2.30 Map 16 (Areas of Ecological and Geological Importance) includes land at North Quay which has permission for the development of a mix of land uses under the outline consent for Hayle Harbour (W1/08-0613 and PA13/01370); and it would therefore not be appropriate to identify any part of North Quay as a semi-natural habitat. 2.31 The requested revised boundary on Map 16 (Areas of Ecological and Geological Importance) is presented at Figure 6.</i>		Note added to map to say that it is provided by Cornwall Wildlife Trust.
83	Lichfields for Bourne Leisure 5 Aug 17	<b>Policy: NE13</b> <i>Support: Bourne Leisure supports draft Policy NE13 as it permits development where the effects can be acceptably mitigated.</i>	Support noted.	No specific action required.
<b>BUSINESS AND ENTERPRISE (BE)</b>				
64	D Jarvis TR27 5AZ 5 Jun 17	<b>Policy BE3</b> <i>There is a lot of space either on North Quay or adjacent to ASDA that would be ideal for hosting a weekly local produce/arts/crafts/souvenirs etc market (like the one on Lemon Quay in Truro), or at least a seasonal market event for Easter, Summer, Christmas.</i>	Refer suggestion to Town Council	No specific action required. Will be referred to Town Council.
85	Cranford (Hayle LLP) 26 Jul 17	<b>Policy BE4</b> <i>Comment: Policy BE4, as currently drafted, is not consistent with the long-established retail tests of the NPPF which should be applied to out-of-centre retail proposals. Equally, its approach conflicts with Policy 4 of the recently adopted Cornwall Local Plan which adopts the NPPF's retail tests. Accordingly, Policy BE4 should be redrafted to reflect both the NPPF's and</i>	The NPPF supports the prime purpose of the policy to recognise town centres as the heart of their communities and pursue policies to support their viability and vitality. The NPPF and LP have enough policy coverage for out of town retail and it's not clear that BE4 adds much to that.	A fourth clause has been added to the policy: iv) has demonstrated a sequential approach to site selection in accordance with para 24 of the NPPF and Policy 4 of the CLP



	FROM	COMMENT	CONSULTANTS' COMMENTS	NPSG NOTES
		<p><i>Cornwall Local Plan's approach to such uses. Out-of-centre retail proposals should:</i></p> <p><i>(i) demonstrate the sequential approach to site selection has been followed, and</i></p> <p><i>(ii) for proposals exceeding 2,500m<sup>2</sup> gross floorspace, demonstrate that there will be no significant adverse impact on the viability and vitality of, and investment within, the existing centres.</i></p> <p><i>As currently drafted BE4 places in its first two criteria ((i) and (ii)) a requirement on out-of-centre proposals to deliver positive enhancement to both the vitality and viability of existing centres and consumer choice. That approach, requiring enhancement, is not a requirement of either Government or Cornwall policy and could, in effect, be used to resist a neutral proposal that neither harmed nor enhanced the vitality and viability of existing centres. That would be contrary to the interests of the town and its residents in that it would preclude otherwise acceptable proposals that, for example, delivered jobs, investment, increased consumer choice or resulted in other wider benefits to the town as a whole.</i></p> <p><i>Consistent with well-established retail policy (as detailed above) the impact test against which such proposals should be judged is that they should not lead to a 'significant adverse impact'.</i></p> <p><i>In the context of the explanatory text to Policy BE4 we would pass the following comments:</i></p> <ul style="list-style-type: none"> <li><i>Whilst we note the Town Council's view that further large out-of-centre foodstore developments are considered to be detrimental to the vitality and viability of the centres, it should be recognised that Hayle is projected to see significant housing growth over the Local Plan period. That housing growth will inevitably lead to an increased need for additional services including increased retail provision including improved food shopping. Whilst any new retail provision should, consistent with the sequential test, be directed first to the town centres, where it cannot be met in a town centre, other locations should be considered. It is important that Hayle continues to meet the shopping needs of its residents, something it failed to do in the past, otherwise residents are more likely to leave the town for their everyday shopping needs.</i></li> </ul>	<p>Criteria ii) and iii) are not enforceable and may even be onerous on a developer to demonstrate. (The policy or text does not set out what developers need to provide to respond to ii) and iii)).</p> <p>The current policy only applies to large food retail and the need to demonstrate that such a development would "enhance not damage" i.e. have a positive impact on the local centres.</p> <p>Suggest you ask CC their view on whether BE4 adds any localised value to LP policies even though they did not provide comments.</p> <p>If you wish to keep the policy as a position statement, and accept that requiring enhancement of the local centres may be unreasonable and hard to prove, perhaps delete "enhance" from clause ii) so it reads:</p> <p><i>will not damage, the consumer choice available within the plan area;</i></p>	
86	Cranford (Hayle LLP) 26 Jul 17	<p><b>Policy BE4</b></p> <p><i>The fourth paragraph of the explanatory text references the consent granted for retail development on the Hayle Rugby Club site. For completeness and consistency, this paragraph should also reference the consent (PA16/03519) now granted for the Hayle Retail Park on our client's land to the north of Marsh Lane.</i></p>	Up-date text	Corrected
87	Cranford (Hayle LLP) 26 Jul 17	<p><b>Policy BE4</b></p> <p><i>In the fifth paragraph, the policy reference should be <b>Policy BE4</b> and not BE5.</i></p>	Should be corrected	Corrected
88	Savills on behalf of the Truro Diocesan Board of Finance 4 Aug 17	<p><b>Site Description</b> - <i>The Diocese has a specific interest in a parcel of land within the HNP and wishes to promote the site for residential development. The eastern part of the site is currently being used for allotments and it is the Diocese's intention to preserve this use. The Diocese's interest however lies in promoting the western portion of the site for residential development. The subject site as shown in the enclosed location plan extends to approximately 1 hectare in size and adjoins Springfield Close. The site is located within the established built form of Phillack and is considered a sustainable location for development. Given the size of the site, it exhibits a number of opportunities to provide different house types and approaches</i></p>	The TDBT's support for the objectives of the NP and its interest in this specific site is noted. Response to its comments on parts of the Plan are dealt with at 30, 54 and 55	No action

	FROM	COMMENT	CONSULTANTS' COMMENTS	NPSG NOTES
		<p>to the delivery of housing. In terms of statutory designations, the site does not form part of any landscape or heritage designations; it sits outside the Phillack Conservation Area as well as the Port of Hayle World Heritage Site.</p> <p><b>Basis for Response</b>  This response has been prepared with regard to the requirements of Neighbourhood Development Plans as set out within the 2011 Localism Act which empowers local communities to develop a shared vision for their neighbourhood.</p> <p>The national tier of planning policy is set out within the National Planning Policy Framework (the Framework) which was published in 2012. The document provides formal guidance to all parties involved in the planning system and covers a wide range of issues. Paragraph 184 is of particular importance as it highlights that:  “The ambition of the neighbourhood plan should be aligned with the strategic needs and priorities of the wider local area. Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan. To facilitate this, local planning authorities should set out clearly their strategic policies for the area and ensure that an up-to-date Local Plan is in place as quickly as possible. Neighbourhood plans should reflect these policies and neighbourhoods should plan positively to support them”.</p> <p>In addition, prior to adoption, the Neighbourhood Plan must comply with the Basic Conditions set out in Paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (as amended). The plan is required to have regard to:</p> <ul style="list-style-type: none"> <li>· National policies and the advice contained in guidance issued by the Secretary of State</li> <li>· Be in general conformity with the strategic policies contained in the Development Plan for the Area; and</li> <li>· Not Breach, and be otherwise compatible with EU obligations and human right requirements.</li> </ul> <p>The Diocese is generally supportive of the objectives set out in the HNP but would like to take this opportunity to make the following comments to ensure that the Plan is able to satisfy the Basic Conditions and is in conformity with the guiding principles of the Framework and the adopted Cornwall Local Plan.</p>		
89	Affordable Housing Cornwall Council 1 Aug 17	<p><b>Housing General</b>  Note: Comments are confined only to the affordable housing implications of this proposal, and are made without prejudice to any formal decision of the Planning Authority.</p> <p><b>Relevant Policy Position:</b>  Neighbourhood Development Plans (NDP) must conform to local, national and strategic planning policy. In relation to affordable housing, the documents listed below are of particular relevance:</p> <ul style="list-style-type: none"> <li>• The National Planning Policy Framework (NPPF);</li> <li>• The Cornwall Local Plan (2010 - 2030);</li> <li>• draft Affordable Housing Supplementary Planning Document (2015)</li> </ul> <p>These set out the Local Planning Authority's (LPA's) expectations in relation to residential developments contributing towards the delivery of affordable housing, and define delivery mechanisms for areas such as Hayle. Consequently, the Affordable Housing Team would recommend that the documents above be used to inform any further evolution of the NDP; its policies; and any site allocations, in due course. It should be noted that Hayle is a named settlement under Policy 3 of the Local Plan.</p>	Include up-dated information in supporting text where appropriate	Updated

	FROM	COMMENT	CONSULTANTS' COMMENTS	NPSG NOTES
		<p><b>Housing Need:</b>  The Council's housing register (HomeChoice) identifies a high level of housing need in the NDP area, with 443 households (May 2017) registered who have a local connection to Hayle and in housing need of affordable rented accommodation. This is different to the number quoted within the pre-submission document. Further the number of those eligible for a 1 bed property is 199, 2 bed 159, 3 bed 63, 4 bed 20 and 5 bed 2, showing that most need is for 1 and 2 bed properties.</p> <p>In addition, there is a far smaller but significant identified local need for Intermediate Homes for Sale on the Help to Buy South West register with 60 households registered for Hayle with most need being in 2 and 3 bed properties. This should therefore be reflected in the NDP, with a focus on providing predominantly affordable rented homes.</p> <p><b>More Information</b>  Applicants should be referred to the Affordable Housing NDP Briefing note and Supplementary Planning Document for detailed guidance</p>		
		<b>TRAFFIC AND TRANSPORT (TR)</b>		
90	Transport Cornwall Council 1 Aug 17	<p><b>General Comments</b>  In terms of their policies and proposals for strategic transport measures, I would concur with what is in the draft document, including the references to Tolroy and the need to support more trips by foot and bicycle. I may have overlooked a line, but it <b>may be worth the neighbourhood plan referring to the need to upgrade strategic junctions to support growth (capacity) including Loggans Moor, Carwin rise and St Erth.</b></p> <p>The One Public Transport project – this isn't referred to in the draft document which may address some of the concerns raised with the quality of public transport.</p>	Include additional references as suggested.	Not updated as the NP does not have the remit to affect major junctions. For Tolroy we are only looking to protect potential space for the junction.
91	D Jarvis TR27 5AZ 5 Jun 17	<p><b>Policy TR1</b>  I think that the official cycle route could be diverted off the main road from Hayle Terrace on to North Quay and then follow the King George Memorial Walk route on to Black Road and then crossing over Lethlean Lane. Along this same line of thought - the pavement running alongside the main road at Beatrice Terrace on the side next to the stream could be removed entirely now as there is already the aforementioned much safer and far more pleasant path behind the stream alongside the recreation ground that provides the exact same thing, negating the need for this part of the pavement. This would allow for the road to be widened to allow traffic to cope better with the on-street parking</p>	Refer to TC for consideration as part of a long-term cycling strategy	Refer to Town Council.
92	Planning Cornwall Council 1 Aug 17	<p><b>Policy TR1</b>  text missing?</p>	Needs to be corrected Add "...necessary."	Corrected.
93	D Jarvis TR27 5AZ 5 Jun 17	<p><b>Policy TR3</b>  I fully support the construction of the Tolroy A30 access point so long as it is an on-ramp/offramp development as a third access point into Hayle town. I would not support this if it were to be made into yet another awful roundabout junction that would cause even more congestion of the roads and delayed journeys.</p>	Refer to CC	Refer to Cornwall Council for their action.
94	S Thompson TR27 4AW	<p><b>Policy TR3</b>  I oppose the High Lanes junction location</p>	Opposition noted, but case against is insufficient to justify change or deletion of policy.	Opposition noted, but case against is insufficient to justify change or deletion of policy.
95	Lichfields for Bourne Leisure 5 Aug 17	<p><b>Policy: TR4</b>  Support  Bourne Leisure has no objection to draft Policy TR4, in principle. However, Bourne Leisure considers that the policy, as currently drafted, is not entirely</p>	Amendment could be acceptable if it read: "Development that gives rise to significant residual cumulative impact on the transport network, that cannot be satisfactorily mitigated, will not be supported"	Added: Development that gives rise to significant residual cumulative impact on the transport network, that cannot be satisfactorily mitigated, will not be supported

	FROM	COMMENT	CONSULTANTS' COMMENTS	NPSG NOTES
		<p>consistent with the NPPF, which notes at paragraph 32 that: "development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe". National planning policy therefore makes clear that new development should only be refused on transport grounds where cumulative impacts are severe, whereas the draft neighbourhood plan policy currently states that development will be refused if giving rise to 'unacceptable highway dangers'.</p> <p>Bourne Leisure therefore requests that the following amendments are made to draft policy TR4:</p> <p>"Major development proposals should identify the realistic level of traffic they are likely to generate. They must assess the potential impact of this traffic on pedestrians, cyclists, road safety, parking and congestion within the area and include measures to mitigate any impacts.</p> <p><u>Development that would give rise to unacceptable highway dangers will not be supported.</u> Development that gives rise to severe residual cumulative impact on the transport network, that cannot be satisfactorily mitigated, will be refused."</p> <p><b>[proposed amendments underlined]</b></p>		
<b>HERITAGE &amp; BUILT ENVIRONMENT (HB)</b>				
96	Education, Cornwall Council 1 Aug 17	<p><b>General</b></p> <p>1. The capacity and NOR information for the schools appears to be out of date, up to date data can be obtained from the admissions team at New County Hall or myself.</p> <p>2. There were discussions at meetings I attended with Hayle TC, to allocate a parcel of land at the rear of Penpol School to safeguard it to expand to 3FE should this become necessary, I cannot locate this in the document.</p> <p>3. Does the TC have a preference for a school site in the development area, this was again discussed to protect education provision.</p>	<p>Amend para. 9.2</p> <p>Refer comment/question 3 to TC</p>	Updated information from Paul Renowden at Cornwall Council has been inserted. 11/09/2017
97	DLA on behalf of Sennybridge (Hayle) 2 Aug 17	<p><b>Policy HB1</b></p> <p>2.32 Policy HB1 reflects the provisions of paragraphs 133 and 134 of the NPPF in relation to public benefits outweighing the harm or loss of significance of a designated heritage asset, which is supported. However, Policy HB1 should be amended to support residential uses within the World Heritage Site, and as a recognised public benefit which can in certain instances outweigh the harm or loss of significance of a designated heritage asset.</p>	Support noted. The policy is not considered to need to be use-specific and applies to all types of development. Insufficient justification given in the comment to require change.	Support noted. The policy is not considered to need to be use-specific and applies to all types of development. Insufficient justification given in the comment to require change.
98	Planning Cornwall Council 1 Aug 17	<p><b>Policy HB1</b></p> <p>This is covered by Policy 24 of the CLP and does not need to be repeated</p>	Need to discuss with Cornwall Council whether there is any added value at all in HB1 over and above the content of Local Plan policy 24. If not, delete policy HB1.	Retain.
99	D Jarvis TR27 5AZ 5 Jun 17	<p><b>Policy HB4</b></p> <p>I really hope something happens with the Mill soon... it looks terrible and you never hear of anyone bothering to try and do something with it</p>	Supports policy – does not require any policy change require or provide new 'evidence' to add to supporting text	Supports policy – does not require any policy change require or provide new 'evidence' to add to supporting text.
100	Planning Policy Cornwall Council 1 Aug 17	<p><b>Policy HB4</b></p> <p>The area contains a large area of flood zone 3b, the policy could encourage unsuitable commercial proposals on the flood plain land next to the A30 which are unlikely to fund the Mill, and doesn't support the DPD approach. There is an ongoing cc housing project for the Mill. The protection area would be better to show a smaller area around the mill.</p>	Need to discuss with Cornwall Council the boundary of the "smaller area" to which the comment refers. Could also discuss potential changes to policy wording to accommodate / overcome concerns re commercial development.	Following a meeting with Cornwall Council there is now no objection to this policy.
101	Sport England 26 Jun 17	<p><b>Sport &amp; Recreation – General</b></p> <p>It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 73 and 74. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss</p>	No specific action required	No specific action required.

	FROM	COMMENT	CONSULTANTS' COMMENTS	NPSG NOTES
		<i>of playing field land.</i>		
102	Local Plan Team Cornwall Council 1 Aug 17	<b>Policies SD6, SD7, CW2, CW3</b> <i>Open Space types 3 (public sport), 5 (teen provision) and 8 (school pitches and clubs) are included in the CIL Draft Regulation 123 list as infrastructure that may be funded through CIL. As a result, it means S106 cannot be sought for these types of infrastructure. The Draft 123 list is being published as part of the Draft Charging Schedule consultation, so may be subject to change, but it is recommended that the NP Steering Group keep themselves informed of developments around this. Up to date information on CIL development and progress can be seen at <a href="http://www.cornwall.gov.uk/cil">www.cornwall.gov.uk/cil</a>.</i>		
<b>SUSTAINABLE TOURISM (ST)</b>				
103	Lichfields for Bourne Leisure 5 Aug 17	<b>Policy: Section 11 – Sustainable Tourism (ST), paragraphs 11.4 and 11.5, page 95</b> <b>Support:</b> <i>Bourne Leisure fully supports these aims and objectives which, in particular, welcome development that extends or broadens the tourism offer and encourages year-round tourism activity.</i>	Support noted.	No specific action required.
104	J Daniel TR27 4HP 27 July 17	<b>Policy ST1 (oppose)</b> <i>Is it realistic to attract more visitors to Hayle without improving facilities i.e. toilets, roads, access to the beach, wet-weather amenities, aa variety of accommodation?</i>	Opposition noted, but case against is insufficient to justify change or deletion of policy.	Opposition noted, but case against is insufficient to justify change or deletion of policy.
105	DLA on behalf of Sennybridge (Hayle) 2 Aug 17	<b>Policy ST1</b> <i>2.33 Proposals for hotel accommodation as set out in Policy ST1 are supported. However, the requirement for hotel accommodation to include conference and exhibition facilities should be removed, as this should be led by market demand. This requirement is unduly restrictive on the hotel providers who may come forward and not conducive to economic growth in Hayle.</i>	The policy has no such requirement. The text recognises a need to encourage conference and exhibition space, and as with the policy, it is not a requirement.	The policy has no such requirement. The text recognises a need to encourage conference and exhibition space, and as with the policy, it is not a requirement.
106	Lichfields for Bourne Leisure 5 Aug 17	<b>Policy: ST1</b> <b>Support with Comment:</b> <i>Bourne Leisure endorses draft Policy ST1 which supports tourism-related development, subject to the criteria set out within the policy. The draft policy aligns with Cornwall Council Local Plan, Policy 5 which allows for new or upgrading of existing tourism facilities through the enhancement of existing or provision of new, high quality sustainable tourism facilities, attractions and accommodation. However, the Company considers that it is important that the new neighbourhood plan policy takes account of the fact that, in some cases, development may be acceptable, subject to the provision of appropriate mitigation measures and consequently, such development would not result in any overall harmful impacts upon local infrastructure, character of the area, residential amenity or road safety. Bourne Leisure considers that the new policy should therefore include sufficient flexibility to allow for the mitigation of adverse impacts. This would help ensure that suitable and sustainable development proposals would not be prevented from coming forward where they include appropriate and achievable mitigation measures. Bourne Leisure therefore requests that the following wording is added to draft Policy ST1: <u>“Development proposals will be considered according to their compliance with the above criteria, and subject to appropriate mitigation measures which address any negative impacts”</u> <b>[proposed amendments underlined]</b></i>	Support noted. Additional policy wording considered acceptable. Development proposals do have to be given the opportunity to mitigate adverse impact / affects (para 152, NPPF).	Agree wording change
107	Lichfields for Bourne Leisure	<b>Policy: ST2</b> <b>Support:</b>	Support noted.	No specific action required.

	FROM	COMMENT	CONSULTANTS' COMMENTS	NPSG NOTES
	5 Aug 17	<i>Bourne Leisure supports draft Policy ST2, as it allows for the development of new sites, and the extension or intensification of existing sites for caravans and tents, including static or other year-round stationed units. Camping and caravan sites have a vitally important role to play within the economy in terms of local employment and attracting significant investment and expenditure within the local area. The draft policy will encourage appropriate and sustainable tourism development, thus extending and broadening the area's tourism offer, in line with the aims and objectives of the Neighbourhood Plan's wider strategy for sustainable development.</i>		
108	Cranford (Hayle LLP) 26 Jul 17	<b>Policy EX1</b> <i>Comment: Class A1 uses should be included in the list of uses to which this policy applies. Whilst, by definition, the circumstances in which retail uses might be permitted will be exceptional, there have been retail developments elsewhere across the UK that have delivered for their towns the economic and social benefits the policy envisages. Obvious examples being Bicester Village in Oxfordshire, Clarks Village in Somerset and Rushden Lakes in Northamptonshire. The policy should at least be open to such exceptional proposals being considered by including A1 use within the list of such uses. Retail proposals of that scale can bring very significant benefits to the town's they serve not least through investment and jobs.</i>	<i>The retail tests in the NPPF and Local Plan are considered sufficient to deal with A1 proposals in the countryside. The comparison with the retail destinations referenced is not appropriate – they may exist, but it does not mean that they are necessarily the most appropriate decisions with which to compare the situation regarding sustainable development now and the need to maintain and enhance the vitality and viability of Hayle's town centre.</i>	<i>Retain and await view of Inspector.</i>
		<b>EXCEPTIONS POLICY (EX)</b>		
109	Lichfields for Bourne Leisure 5 Aug 17	<b>Policy: EX1</b> <i>Support</i> <i>Bourne Leisure does not object to draft Policy Ex1, in principle. However, Bourne Leisure is concerned that the policy does not provide explicit reference to maintaining/ enhancing local amenity. It is Bourne Leisure's view that amenity should not be put at risk by non-residential development proposals for B1, A2, D1, D2 and sui generis uses. Such uses have the potential to have an adverse impact on amenity, for example through the generation of noise and traffic, via visual impact, odour and so forth. Bourne Leisure considers that draft Policy EX1 should therefore ensure that such uses, particularly given their potential impacts, will not have adverse impacts on the amenity of surrounding areas, otherwise there is a risk for example that visitors may be deterred from coming or returning to the area, which will consequently have wider, harmful implications for the local economy. Bourne Leisure therefore requests that the following text is added within draft Policy EX1:</i> <i>“Development proposals for B1, A2, D1, D2 and sui generis uses in the countryside will only be supported in exceptional circumstances where:</i> <i>i) the proposed development demands a countryside location,</i> <i>ii) other locations within the built-up area boundary or on its edge are not appropriate for the proposed use and</i> <i>iii) the proposal is outside of statutory environmental, ecological and geological designations. Proposals will preferably be on a brownfield site. For proposals to be considered exceptional they should demonstrate, through a Planning Statement and Business Plan, that:</i> <i>i) there is a local need and long-term market demand for the proposed development;</i> <i>ii) it would make a substantial contribution to the economic, employment, social, cultural and other key objectives of the town;</i> <i>iii) it would enhance Hayle's distinctive identity;</i> <i>iv) it would demonstrably raise the profile of Hayle regionally or nationally;</i>	<i>Support noted. Suggested addition seems acceptable.</i>	

	FROM	COMMENT	CONSULTANTS' COMMENTS	NPSG NOTES
		<p>v) evaluates siting options;</p> <p>vi) mitigation measures will be put in place to offset the loss of the natural environment, landscape and ecology arising from development of the site; <del>and</del></p> <p>vii) the benefits for the community arising from the proposal outweigh the loss of the site and its setting, <u>and</u>,</p> <p>viii) <u>that there are no adverse impacts on amenity.</u></p> <p>Proposals should be accompanied by:</p> <p>a Travel Plan which minimises the impact of increased traffic on the local road network and seeks to enhance sustainable travel options for employees and visitors; and</p> <p>a Statement of Community Consultation detailing how the communities of the neighbourhood area have been consulted on the exact nature of the development proposal.”</p> <p><b>[proposed amendments underlined]</b></p>		
110	Planning Policy Cornwall Council 1 Aug 17	<p><b>Policy EX1</b></p> <p>This policy could encourage inappropriate development in the countryside. If a truly exceptional proposal came forward it could be treated as an exception to the plan's policies – there is no need to have a policy about this.</p>	The comments are appropriately concerned about the implications of the policy. Discussion should be held with Cornwall Council to better inform a decision on whether or not to retain the policy.	
<b>NATURAL ENGLAND COMMENTS</b>				
111	Natural England 3 August 2017	<p><b>Chapter 6 (Business, Enterprise and Economy)</b></p> <p>We suggest that in this chapter you also identify the important link between the natural environment of the parish and the considerable benefit this environment has brought, and continues to bring, to the local economy.</p>		6.4 updated to delete the reference to 34% of employment is in the tourist sector. Added reference to the importance of the natural environment.
112	Natural England 3 August 2017	<p><b>Chapter 7 (Natural Environment and Landscape Setting)</b></p> <p><b>POLICY NE2 Undeveloped Coastal Areas - The adopted Local Plan policy relating to the undeveloped coast requires that only development requiring a coastal location and that cannot be achieved elsewhere, will be acceptable in the area of undeveloped coast. Notwithstanding the NP policy stance that only improvements to existing built development may be acceptable, we suggest that in the interest of transparency you add that it also needs to be demonstrated that the development requires a coastal location.</b></p>		An additional clause added: Requires a coastal location.
113	Natural England 3 August 2017	<p><b>POLICY NE6 Sandy Acres</b></p> <p>We have serious concerns about this policy. The policy together with accompanying Map 11 appears to allocate three different areas for respectively campsite improvements and facilities, café, visitor and car parking improvements and facilities and for pedestrian access improvements including wheelchair access (presumably hard surfacing). The three allocations are shown as generous areas around the current informal campsite area, basic café with car park and network of small sandy paths to the coast. The allocation areas are situated within an SSSI and appear to take more land within the SSSI, beyond the current footprints. The SSSI is important as an exposed, dynamic dune system, supporting a rich and diverse flora. Bare sandy surfaces are a key characteristic of this dynamic dune system and hard-surfaced paths and fixed buildings are contrary to the interest of the SSSI.</p> <p>In more detail, our concerns about the different elements of the allocation centre around the following:</p> <ul style="list-style-type: none"> <li>• Beach access improvements: the fixing (hard surfacing) of paths, contrary to the interests of this SSSI</li> <li>• Café and visitor facilities: impacts from additional land-take within the SSSI, the impacts from the showering facilities and public</li> </ul>		Under discussion with NE

	FROM	COMMENT	CONSULTANTS' COMMENTS	NPSG NOTES
		<p><i>toilets (including connections to services) on the protected features of the SSSI, the addition of fixed buildings and visual impacts</i></p> <ul style="list-style-type: none"> <li>• <i>Car parking: additional land-take within the SSSI, hard surfacing and visual impacts</i></li> <li>• <i>Campsite: additional land-take within the SSSI and incremental intensification, impacts from showering facilities, toilets etc on the protected features of the SSSI, visual impacts, and additional recreational and other impacts on the SSSI from increased number of visitors on the campsite.</i></li> </ul> <p><i>The SEA does not assess this allocation properly and alternative options are not considered.</i></p> <p><i>Whilst we fully understand the desire to improve current facilities, including beach access (which is already supported through Policy NE4), we object to this broad-brush allocation. We recommend that the policy is changed from an allocation policy to one of support, for improvements to existing beach access and café/parking facility, providing they remain on the existing footprints, improvements remain informal, surfaces are not fixed, improvements are based on sustainability principles, all impacts on the SSSI are mitigated and enhancement are required, including in the form of an educational function incorporated in the improvements and the landscape character is protected and enhanced.</i></p>		
114	Natural England 3 August 2017	<p><i>POLICY NE7 Protection of Green Infrastructure – We welcome this policy and would like to inform you that Natural England intends to notify 'the Spit' because of its important population of petalwort, which is a Red Databook Species.</i></p>		