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Your ref:



BY EMAIL ONLY

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Dear John Bennett

Planning consultation: Hayle Neighbourhood Plan - Pre-Submission version

Thank you for your consultation on the above dated 05 June 2017.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

We recognise the hard work being done by the Hayle Neighbourhood Plan group in developing a Neighbourhood Plan and we welcome being consulted on this pre-submission version. We hope our comments as shown below will help in developing a Neighbourhood Plan that balances the community to grow and flourish alongside the wonderful natural environment contained within the Parish.

We welcome the Hayle Neighbourhood Plan and its underlying general support for the natural environment of the parish. We note the Strategic Environmental Assessment (SEA) undertaken to inform and underpin the plan and the improvements to the plan based on the SEA findings

Detailed comments:

Chapter 6 (Business, Enterprise and Economy)

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.

Chapter 7 (Natural Environment and Landscape Setting)

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.

POLICY NE6 Sandy Acres – 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.

In more detail, our concerns about the different elements of the allocation centre around the following:

- Beach access improvements: the fixing (hard surfacing) of paths, contrary to the interests of this SSSI
- Café and visitor facilities: impacts from additional land-take within the SSSI, the impacts from the showering facilities and public toilets (including connections to services) on the protected features of the SSSI, the addition of fixed buildings and visual impacts
- Car parking: additional land-take within the SSSI, hard surfacing and visual impacts
- 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.

The SEA does not assess this allocation properly and alternative options are not considered.

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.

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.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Corine Dyke on 02080 268177 / 07717 888537 or corine.dyke@naturalengland.org.uk. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

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