Perranzabuloe Neighbourhood Development Plan Feedback

Contents

Abbreviations	2
Standard general replies	
Standard initial reply"" as used pre 17th June 2022	
Standard initial reply"" as used post 17th June 2022. ie post end of Regulation 14 period	
Standard Local Green Space (LGS) letters	
Standard Local Green Space (LTS) letter sent out late April / early May 2022	
Standard Local Green Space (LTS) letter sent out late September / early October 2022	
Informal Community Consultation on draft NDP (i.e. before Regulation 14)	8
Regulation 14 Consultation - Cornwall Council Planning Department Input	22
Regulation 14 Consultation - 8 weeks from 22nd of April '22 to 17th of June '22 - Comments	22
Regulation 14 Consultation - Public Exhibitions - Comments	89
Supplementary Consultation on Proposed Changes to the NDP (8 weeks from 19th Jan to 2nd Mar '23) – Responses & Comments	96
Statutory Consultees – List with responses	126
Comments Appendix 1: Perranzabuloe Policy Matrix – Cornwall Council officer comments Feb 2022 & SG responses March 2022	132

Abbreviations

NDP Neighbourhood Development Plan Steering Group SG MOTP Member Of The Public (some numbers are missing from when culling duplications) Business, Employment, Transport & Infrastructure BETI ST Stuart Todd - Advisor to the SG RJ Rory Jenkins - Chairman of the SG WR Will Rogers - Secretary of the SG KΗ Kevin Havill- SG member. Vice chair and head of the BETI Group RK Roger Kayes - SG member. Head of the NDP Housing Group PM Phil Moore - SG member PH Phillip Henwood - SG member tirwell Planning consultant used by the SG **Cornwall Council** CC PPC Perranzabuloe Parish Council

Standard general replies

Standard initial reply" as used pre 17th June 2022

The standard initial reply to Regulation 14 comments was:

Thank you for these comments on the Perranzabuloe Neighbourhood Development Plan (NDP).

We will consider all comments and requests for adjustments at the end of Regulation 14. Regulation 14 will run from Friday the 22nd of April, for 8 weeks, ending on Friday the 17th of June 2022.

We would like to reassure you that we have your comments on file and will consider them post the 17th of June. The NDP preparation process requires the Steering Group to maintain and submit to the Examiner a compilation of comments submitted during consultation and the decisions we have taken in response. This compilation will be published on our www.perranplan.co.uk website and the Cornwall Council website."

Standard initial reply" as used post 17th June 2022. ie post end of Regulation 14 period

The standard initial reply to Regulation 14 comments was:

Thank you for these comments on the Perranzabuloe Neighbourhood Development Plan (NDP).

We will consider all comments and requests for adjustments to the NDP at the end of Regulation 14.

Regulation 14 ran from Friday the 22nd of April, for 8 weeks, ending on Friday the 17th of June 2022.

We are now collating all of the comments to begin considering them all.

We would like to reassure you that we have your comments on file and will consider them. The NDP preparation process requires the Steering Group to maintain and submit to the Examiner a compilation of comments submitted during consultation and the decisions we have taken in response. This compilation will be published on our www.perranplan.co.uk website and the Cornwall Council website."

Standard Local Green Space (LGS) letters

The SG had standard letters that were emailed or posted to all LGS landowners.

Most LGS landowners had a further more detailed LGS explanation sent a few months later.

These letters are below, with a table of which landowner was sent which, when.

Data protection means we have not given the contact details for these consultees. They are on our table of consultees which will be shared with Cornwall Council and the Independent Examiner for them to repeat contact these consultees for comments they may wish to make.

LGS No.	Description	1st letter (Apr/May '22)	2nd letter (Sep/Oct '22)	Further letter(s)	Ownership / who contacted	Contact details
1	Bakery Way open space				Unidentified ownership	
2	Bolenna Way	yes	yes		Perranzabuloe Parish Council (PPC) - also updated via Parish Councillors on the SG	Consultee 26
3	Bolingey Channel Walk	both	both	14/09/2022	Tregothnan Estate & Consultee 30	Consultee 60 & 30
4	Bolingey Lakes	yes	02-Sep		Postal address	Consultee 61
	Bolingey Lakes			23/05/2023	Email from land agent for this land.	Consultee 63
5	Bolingey wet Woodlands and Railway Lands	both	both	14/09/2022	Tregothnan Estate & Consultee 62	Consultee 60 & 62
6	Boscawen gardens & Bowls	yes	yes	29/04/2022	Perranporth Garden Charity, statutory consultee notifications sent	Consultee 64
7	Bridge Road Recreation ground	yes	yes		Perranzabuloe Parish Council (PPC) - also updated via Parish Councillors on the SG	Consultee 26
8	Calestick Cemetery	yes	02-Sep		Reverend for the cemetery	Consultee 65
9	Cligga Sports field	yes	yes		Perranzabuloe Parish Council (PPC) - also updated via Parish Councillors on the SG	Consultee 26
10	Clock Gardens	yes	yes	29/04/2022	Perranporth Garden Charity, statutory consultee notifications sent	Consultee 64
11	Droskyn Sundial	yes	yes		Perranzabuloe Parish Council (PPC) - also updated via Parish Councillors on the SG	Consultee 26

12	Goonhavern Lakes	yes	02-Sep		Local land owner	Consultee 66
	Goonhavern Lakes	yes	02-Sep		Local land owner	Consultee 67
	Goonhavern Lakes	yes	02-Sep		Local land owner	Consultee 41
13	Hendrawna Park	yes	02-Sep	14/09/2022	Tregothnan Estate	Consultee 60
14	Nampara Walk	both	both	29/04/2022	Perranporth Garden Charity & Tregothnan Estate	Consultee 60 & 64
15	New Road wet woodland	both	both	14/09/2022	Perranzabuloe Parish Council (PPC) & Tregothnan Estate	Consultee 26
16	Perranporth Cricket & Football	yes	yes		Perranzabuloe Parish Council (PPC) - also updated via Parish Councillors on the SG	Consultee 26
17	Perranporth Inner Green	yes	yes		Perranzabuloe Parish Council (PPC) - also updated via Parish Councillors on the SG	Consultee 26
18	Perranzabuloe Church churchyard	yes	yes		Reverend for the churchyard	Consultee 70
19	Ponsmere valley sports pitches	yes	yes		Perranzabuloe Parish Council (PPC) - also updated via Parish Councillors on the SG	Consultee 26
20	Ponsmere valley play area	yes	yes		Removed during Regulation 14 Consultation - PPC	Consultee 26
21	School house wood Penwartha	yes	yes		Removed during Regulation 14 Consultation	Consultee 69
22	St Georges mine valley	yes	yes		Removed during Regulation 14 Consultation	Consultee 68
23	St Georges football field	Yes	02-Sep		Local land owner	Consultee 13
24	Tregundy road open space	yes	yes		Cornwall Council - reviewed the NDP & emailed	Consultee 1
25	Wheal Albert marsh & heath	yes	yes	02-Sep	Local land owner	Consultee 71
		yes	yes	02-Sep	Local land owner	Consultee 5
		yes	yes	02-Sep	Local land owner	Consultee 72
		yes	yes	02-Sep	Local land owner	Consultee 73

		yes	yes		Local land owner	Consultee
						74
26	Wheal Anna heath	yes	02-Sep		Local land owner	Consultee
						34
		yes	yes	23/05/2023	Local land owner	Consultee
						59
27	Wheal Anna woodland	yes	02-Sep		Local land owner	Consultee
						75
28	Ramoth Way			20/11/2022	Agent for local land owner(s)	Consultee
						43

Standard Local Green Space (LTS) letter sent out late April / early May 2022

Perranzabuloe Neighbourhood Development Plan - Local Green Spaces

We are presently completing the final stages of the Perranzabuloe Neighbourhood Development Plan. This goes to formal Public Consultation from 22nd April. In the Plan we have identified land that can be designated as 'Local Green Spaces.'

To qualify as Local Green Space the land should be:

- a) in reasonably close proximity to the community it serves:
- b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife:
- c) local in character and is not an extensive tract of land.

Land at Xxxxxx as shown on the attached map extract (area 1) has been selected as a Local Green Space. We believe that you are the freeholder of this land, and we are therefore informing you of this intention of designation. We would welcome your comments as part of our consultation process.

Standard Local Green Space (LTS) letter sent out late September / early October 2022

Perranzabuloe Neighbourhood Development Plan - Local Green Space Designation: <name of LGS land>

Thank you for your correspondence <commenting / objecting> to the proposed designation of some of your land as Local Green Space (LGS) in the Neighbourhood Development Plan (NDP).

There has possibly been some misunderstanding about the implications for landowners of this designation and we apologise if this is the case. This letter is intended to clarify this.

We wish to reassure you that designation as a LGS carries no implications on you as the landowner, other than for future development ('development' as used in the Town and Country Planning Acts). Designation as a LGS simply means that future proposed development of the land would be much less likely to get planning approval.

In particular we would like to stress that designation as a LGS

- does not give additional public access rights other than on already existing public rights of way, such as footpaths, bridle ways and permissive paths.
- does <u>not</u> imply any additional responsibilities, costs, or liabilities to the landowner in terms of land management.

Some parties have confused the LGS designation with the term 'Open Space' or 'Public Open Space', both of which carry connotations of public access and use.

This is understandable but unfortunate. LGS designation can apply to land with no public access (for information, look at the LGS designation part of Open space, sports and recreation facilities, public rights of way and local green space on the GOV.UK website. This supplements and expands information in the National Planning Policy Framework (NPPF), which is also available online).

In our NDP survey, sent to every household in the Parish during the early stages of conducting our NDP work, we gained considerable feedback from Parishioners on many subjects about their wishes for the future. A very high proportion of the respondents from the Parish (95% plus) wished to protect and enhance the beautiful environment and landscape we are all privileged to enjoy.

As such, the NDP steering group has made considerable efforts to identify Local Green Spaces in and around the Parish that we believe are of special value and beauty to the parishioners. Where these areas identified are not protected by other formal designations (such as SSSI designation), we have sought to propose them as Local Green Spaces. Designation of special areas of beauty and amenity simply provides protection of these areas into the future and will be very welcomed by the vast majority of our parishioners.

Having considered your request at length, we are still proposing to include your land for designation as a LGS in the draft NDP for Perranzabuloe Parish.

We sincerely hope this letter provides reassurance about your concerns regarding LGS designation. However, if you still wish to object to the designation of your land as a LGS in the NDP, you will have another opportunity to submit your concerns when Cornwall Council hold their statutory consultation later this year, as the stipulated NDP approval process is followed.

We understand that when Cornwall Council holds this consultation, they will ask us to notify relevant parties, and we will endeavour to contact you at that stage. Any comments that you make at that stage will be forwarded to the external examiner, who will make the final decision any outstanding disputes.

Informal Community Consultation on draft NDP (i.e. before Regulation 14) – early 2022

Consultee 1	Senior Development Officer - Cornwall Council / Planning and Housing
Туре	Statutory Consultee
Date	Feb-22
Topic(s)	Multiple.
Comments	Firstly, can I just say what a professional, comprehensive and well-written plan it is. It has clearly taken a significant amount of time and work from you and many other volunteers - congratulations on getting it this far. I attach an overview of comments against your policies - I asked several internal officers to review your policies and I attach a report with some of our thoughts. In general though, we would recommend some consolidation to reduce the number of policies. From our perspective, we want to make sure that your policies are easy to find, understand and use when planning applications are submitted and the sheer number of policies may make this more difficult. If you'd like to talk through any of the suggestions made, we'd be very happy to meet with you (on Teams or Zoom) if that is helpful. There are a couple of policies where I have not managed to get a response yet (flooding and renewables) – I will catch up with the appropriate officer after half term and give you any feedback on those. I hope you find the comments useful. There are some links below which may help in understanding some of these comments: - Climate Emergency Draft DPD – this contains draft new planning policies that will apply across Cornwall to help tackle climate change issues. Consider whether the policies in this DPD will address the issues / ambitions in your plan. There is likely to be scope to remove some of your policies as they will be addressed by the policies in here. If this is the case, please remove the policies in your plan to remove duplication. Climate Emergency Development Plan
	Document - Cornwall Council and biodiversity guide Planning for Biodiversity (cornwall.gov.uk) and Environmental Growth Strategy Environmental Growth Strategy Let's Talk Cornwall - The Cornwall Design Guide - Cornwall Design Guide - Cornwall Council Resp 01 - CC.pdf Resp 02a - CC.pdf"
SG Response	The SG met 2022-03-29 and went through all the Cornwall Council comments on the Policy Matrix. Stuart Todd (ST) and Lucy Richards from Tirwell (the 2 main external consultants) also gave their input. The SG decisions were recorded and the consequent changes made to the NDP before it became the Regulation 14 version. A copy of this is attached, see below. Although only ST, RK and tirwel comments are on the document all of the SG made comments and were part of the process.
	Resp 02b - CC.pdf

Consultee 2	
Туре	MOTP 01
Date	15/02/2022
Topic(s)	Settlement Boundary
Comments	I have been handed a leaflet posted to residents on the Perranzabuloe NDP.
	My land is shown in the attachment Title CL190151. The land used to be the Godbers Nursery in Bolingey. I currently have a planning application with the Council to convert an open sided barn to a secure barn and hope to obtain permission for a small number of glamping units on the site. In Appendix 2 of the NDP - Definitive Settlement Boundary Maps - Page 10 (Attached) - my land is outside the NDP. In the attachments - Truro Tree Preservation Order Penwartha Coombe Map and Cornwall Map, my land is within the boundry. I understand from my direct neighbour of the Old Pottery, their land used to be within the NDP, and believe
	I do not know, if the same circumstance has been applied to my land, but I would like to formally request, my land Title CL 190151 be considered for incorporation. Please let me know if contacting you direct is sufficient for you to relay my request or if I need to complete a Specific Form.
SG Response	17/02/2022 WR revert email and repeated 28/02/2022
	Yes, it does appear that the majority of the land in the Title Deed CL190151 would fall outside of the proposed Settlement Boundary for Bolingey. There isn't a connection between a Tree Preservation Order area and a Settlement Boundary. The basis upon which the Settlement Boundaries were determined are laid in 3 documents on the https://www.perranplan.co.uk/documents/ page of our Website. I've put links to the 3 documents below.
	Have you looked at and considered these? They are based upon what the majority of the community have said they want. If you can identify how the proposed boundary does not tie in with the basis we have for determining the Settlement Boundary in relation to Title Deed CL190151, we will of course look at that.

Consultee 3	
Туре	MOTP 02
Date	05/04/2022
Topic(s)	Settlement Boundary
Comments	Sorry I have not contacted you sooner. Xxxxx's neighbours Xxxxx and Xxxxx Xxxxx mentioned you were meeting to discuss points raised by Xxxxx and Xxxxx Xxxxx around the 24th March in association with the NDP. I did look at the links you kindly provided, and particularly reference to the refused planning submitted by the previous owners in 2017 that stretched over a larger area of land now split into 3 parcels. I understand from the residents although 4 large (out of keeping) houses were proposed, the future intention if successful was to further develop the remaining land, and hence the refusal. This is history, and what Xxxxx is trying to achieve with the land has been welcomed by the residents. As a local resident and surf instructor at \$1 Agnes, restoring the large barn on the land and keeping livestock, it is our hope to build an A Frame Eco Wood Chalet on the existing footprint of a smaller barn in the middle of the land for Xxxxxx 's residential use. The incorporation of even part of the Title would greatly help. I attach an amended plan showing 2 highlighted orange buildings. The larger is the working barn. The smaller the proposed site for the A Frame. within a proposed boundry.
SG Response	2022-05-06 - Standard reply sent. SG discussed this and concluded there were no presented (or other) grounds to change the Settlement Boundary.
	NO ACTION REQUIRED.

Consultee 4	
Туре	MOTP 03
Date	04/02/2022
Topic(s)	Pavement parking
Comments	To whom it may concern,
	please find attached a pdf response to the policies regarding pavement parking.
	Regards,
	• Resp 03 - MOTP 03.pdf
	This Consultee 4 / MOTP 03 later (31/05/2022) sent further comments.
SG Response	18/02/2022
	Many thanks for your Email. We appreciate your comments.
	We are collating all comments, from everybody, so that we can address them in one large go when the consultation period on the draft plan has 'run its course'.
	Later this year (hopefully before the summer), we will have public consultation engagement sessions.
	Our mandate is to represent the majority wills of parishioners. As required, we want to continue getting parishioner input and check that the draft aligns
	with the majority wills.
	SG extensive discussion was that although we agree with the main thrust and most of the specific comments being made, in the areas where we feel the proposed plan doesn't already address the matters raised, the evidence base required to over-ride the Cornwall Council rules is too extensive for the team to tackle. Following the NPPF advice, an objective and extensive car parking study would be required to ensure that locally set parking standards supersede those adopted by Cornwall Council. We would suggest, however, that we strengthen the supporting / justification text for policy HO3 to include references to the newly adopted Climate Emergency policy T2 and requirement for Neighbourhood Plans to refer to the DPD policy. We will also reference the Local Plan (para 2.80 which refers to parking standards and we will also refer to the Travel Plan guidance for developers. We recognise the concerns raised about HO3 criteria 1 i), however, and will remove the words "at least". The criteria already suggests that developers should exceed these where feasible and viable, although we appreciate the balance suggested by the Climate Emergency DPD in policy T2, criteria 5 of which states that "Residential car parking should generally be provided off-plot in specifically designed on-street parking bays or other purposely designed spaces that are
	well designed in terms of safety, supervision, circulation, appearance and assist access by pedestrians and cyclists taking into account any particular user or site conditions that might indicate otherwise. Layouts should not increase pressure for off-site parking and should contribute to on-street parking controls where necessary". In theory, we recognise that this policy statement should enable design to accommodate parking and pedestrian access appropriately and safely. Our policy HO3 seeks to emphasise the importance of the number of spaces alongside the Cornwall Council policy. We appreciate the comments made by the respondent about minimum parking standards set by Cornwall Council making it easy for developers to circumvent, but it is not within our control in the Neighbourhood Plan to supersede or replace these standards or policy set out in the Climate Emergency DPD. We will add reference to the National Design Guide in the policy although it, and reference to the tests set out in Building for a Healthy Life, are already referenced in policy HO2.

Consultee 5	
Туре	SG member until November 2020
Date	30/05/2022
Topic(s)	LGS map error ?
Comments	I have received a letter dated 25th May which refers to our potential allocation.
	Unfortunately, the accompanying Gov search extract and map do not correspond with each other and are not areas of green space.
	The Gov search states CL176485 (which might be right, but am not sure - so will need double checking), but the map shows CL186366 which is not owned
	by us any more and is a scrap yard, and CL217796 which is ours but consists of a narrow earth bund created for noise amelioration purposes.
SG Response	04/04/2023. Post RK discussing this with the SG member that noted the possible error, the SG agreed that the western end of proposed LGS 25 extended
	into land not originally planned. This seemed to be mapping error, so the western edge of LGS 25 was corrected to not extend into land that wasn't
	intended to be part of the LGS.

Consultee 4	
Туре	MOTP 03
Date	31/05/2022
Topic(s)	Multiple
Comments	Dear NDP,
	in response to the consultation i would like to raise the following points.
	Policy NE2 reads:
	'1. Development proposals which clearly reference the local landscape character of the site's setting, in terms of nature, scale, density, massing, design, materials and soft landscaping, and which can demonstrate neutral or beneficial effects on landscape character resulting from the proposals through an
	appropriate level of impact assessment, will be supported.
	2. Areas within the Parish which contribute significantly to the area's local landscape character and which are recognisable landscape features in their own right have been identified through the LLCA. Within these areas, referred to as Landscapes of Local Significance and defined in Map 10 (above) and Appendix 7, particular care is expected to be taken to avoid or minimise any harm to existing character as a result of development or land management and measures to enhance the overall condition will be supported.'
	Para graph 1- The words 'can demonstrate neutral or beneficial effects on landscape character' do not tally with the new objectives of the NPPF or Cornwall Council emerging documents which require the conservation and enhancement of natural and historical assets. I respectfully suggest the minimum requirement here is to avoid first and mitigate, where appropriate, second and only where the development proposed provides a benefit to the community alongside the mitigation as per the policy of Policy 22 Cornwall Local Plan 2016. Compensate would be inappropriate considering the level of parishioner support for these areas to be protected.
	Paragraph 2- Furthermore, section 2 does not follow the mitigation hierarchy established within the NPPF of avoid, mitigate, compensate. Requiring harm to be minimised allows harm to be caused. 'Particular care' is an easy bar to achieve and merely requires a report saying harms have been minimised. I respectfully suggest that once again the mitigation hierarchy is followed with only avoid and mitigate allowed by the policy. particular care should be removed. it could read:
	'Within these areas, referred to as Landscapes of Local Significance and defined in Map 10 (above) and Appendix 7, harm to the existing character as a result of development or land management is to be avoided and will not be supported. To receive support the benefits of the scheme to the public must be demonstrable, outweigh the harms to the character or appearance, and be appropriately mitigated.'
	I continue to object strongly to the weak wording of HO3 and have already submitted suggestions on how this could be amended to achieve a realistic outcome.
	"However, for the sake of clarity i will add them again briefly:
	'1. A development proposal for housing development will be supported where it: i) at least meets the requirements for number and type of spaces specified by the most up-to-date Cornwall Council parking standards, and exceeds them
	where feasible and viable;
	ii) preferably provides a minimum of two on-plot parking spaces per unit side by side where feasible, not in line, to discourage on-street parking; iii) does not introduce a need for additional demand for parking on the existing road network; and,
	iv) on redevelopment and replacement housing sites, there is no loss of existing on-site parking capacity.'

Policy HO3 1(1) must be removed entirely. There are no requirement s for the number of spaces in the Cornwall Council parking standards. it simply states it should be appropriate which is policy speak for do what you can get past the decision maker. A number per unit must be allocated to achieve relief from problem parking, a minimum of two spaces per unit and an additional requirement for 1 visitor parking for every 4 units.

Policy HO3 1(2) should be reworded removing 'preferably provides' which is optional. I suggest a minimum of 2 spaces per housing unit in order to relieve the identified problem of pavement parking and an additional space per every 4 units. This issue has been clearly raised by many residents in response to this consultation and without an adequate policy now this problem will persist on all new approved development. Proof can be seen at the 'Ocean' development where one parking space has been allocated to 3 bed houses as its in a sustainable location. This is a nonsense policy enabled by the feeble CC parking standards designed some 10 years ago. Garages are not considered parking spaces as they are often converted to living accommodation. Pavement parking forces vulnerable Footway (a legal part of the Highway) users into the road and results in vulnerable users staying at home rather than run the risk and abuse from perpetrators of pavement parking that are asked to move. Streets must be accessible for all.

SG Response

"03/06/2022 WR email reply:

Many thanks for your email. We will be examining all comments after the consultation period closes later this month, and will be writing to you again after this time."

With regard to policy NE2, this has been produced by our landscape consultant and considered and not questioned, by Cornwall Council officers and we would therefore conclude that it is in alignment with the strategic policies of the Local Plan. However, we agree that the suggest changes to criteria 2 of the policy could strengthen it and will amend the policy in line with the respondent's suggested wording.

Later SG discussion concluded that we agree new properties should have better parking allocation rules, but we are limited with regard to what we can effectively enforce through the Neighbourhood Plan. Please see comments on HO3 in our previous response to the same respondent As per previous SG discussions over comments from this MOTP, over-riding the Cornwall Council rules and guidance will require a level of research, data and analysis we do not have the capacity to undertake.

We also note that the Cornwall Council parking standards which are part of the CC local plan (see within the ""Travel plan advice for developers"" off the https://www.cornwall.gov.uk/travelplans page, Cornwall Council does have on page 19 of https://www.cornwall.gov.uk/media/hi5llbkw/travel-planguidance-proof9-2.pdf.)

We also note that the Cornwall Council Climate Emergency NDP includes ""9.18

Neighbourhood Development Plans will be expected to follow the guidance set out in this DPD, the Council's Parking Standards Guidance and the Cornwall Design Guide when considering policies regarding the provision of parking in the neighbourhood plan area. p.31 Climate Emergency DPD"".

Consultee 6	
Туре	MOTP 04
Date	19/02/2022
Topic(s)	Multiple
Comments	We have lived in Perranporth for ten years, during which time the village has grown in population considerably. We need to catch up now. The availability of doctors and school places hasn't kept pace with the population growth and there are nowhere near enough affordable houses for our local people. We should see, as a matter of urgency, the reintroduction of council housing for locals who want to live and/or work here.
	Perranporth is a major tourist attraction and yet we don't have a leisure centre or swimming pool. The pipe dream of a skate park has become a laughing matter with the procrastination and low priority that it has attracted.
	In future we need to see far less new build of expensive private houses and a better mix of shops in the centre. We already have enough restaurants, pubs, trinket shops and unaffordable houses for a settlement twice the size of Perranporth. We are in dire danger of losing the very attractiveness that has made our village what it is today.
	Thank you for this opportunity.
SG Response	8/5/2022 - Standard initial reply sent. Although the SG are sympathetic to the comments, they are beyond the remit of the NDP.
	NO ACTION REQUIRED ?

Consultee 7	
Туре	MOTP 05
Date	02/03/2022
Topic(s)	
Comments	Hello NDP Committee, I understand that public meetings are an integral part of the NDP examination and approval process. Unfortunately I have a severe hearing impairment which makes participation in public meetings impossible. In order to make the examination and approval process non-discriminatory would it be possible for me to view the public comments that have been submitted to comments@perranplan.co.uk? This would enable me to participate in and contribute to the public debate.
SG Response	No problem at all for us to share the comments we've so far had. Because of GDPR / Data Protection I will need to strip out any personal data (eg who sent in the comments etc.) We are planning to wait until we have a lump of comments in, before considering them all. Part of this is because we are required to make sure the NDP represent the majority wills of parishioners. Focusing in on comments as they come in, brings with it the possible danger that we could get overly absorbed by one persons views (even if some of us personally agree with the views) as opposed to what we can show the majority want. Are you OK that we wait until we collate the responses and then send them over to you? If you want to look at the consolidated responses from the main surveys we have historically undertaken, these are on our Website. - see https://www.perranplan.co.uk/2019/10/21/public-survey-results-initial-findings/ AND later, 08/05/2022 email to MOTP 5 I've come back to this as although there is a growing document of public comments the Neighbourhood Development Plan process is that we consider all comments and requests for adjustments at the end of Regulation 14. Regulation 14 will run from Friday the 22nd of April, for 8 weeks, ending on Friday the 17th of June 2022. We will have to redact (remove personally identifiable details) the comments and it is continually growing (albeit slowly). When we get to post the 17th of June, this compilation will be published on our www.perranplan.co.uk/2022/04/26/public-exhibition-posters/ If you look at these, you will be as informed as any who attended the events. - if the posters and other information means you have comments or questions, please just let us know. Later got further detailed representations from Consultee 7 / MOTP 5.

Consultee 7	
Туре	MOTP 05
Date	2022-05-27
Topic(s)	Settlement Boundary to SW of Bolingey
Comments	Received letter which has been scanned and is in the responses folder
	• Resp 04 - MOTP 05.pdf
SG Response	2022-06-07 Thank you for these comments (scan of letter received is attached) on the Perranzabuloe Neighbourhood Development Plan (NDP). We will consider all comments and requests for adjustments at the end of Regulation 14. Regulation 14 will run from Friday the 22nd of April, for 8 weeks, ending on Friday the 17th of June 2022. We would like to reassure you that we have your comments on file and will consider them post the 17th of June. The NDP preparation process requires the Steering Group to maintain and submit to the Examiner a compilation of comments submitted during consultation and the decisions we have taken in response. This compilation will be published on our www.perranplan.co.uk website and the Cornwall Council website. See SG response to letter, via lawyer for Consultee 7 MOTP 05

Stephens Scown LLP for our client "Consultee 7"
Karolina Smolicz (she/her), For and on behalf of Stephens Scown LLP, Trainee Solicitor, Planning
planning@stephens-scown.co.uk
MOTP 05 via a law firm
21/03/2022
21/03/2022
Dear Sirs,
We are instructed by our client Mr XXX XXXXX to provide representations on the proposed Perranzabuloe Neighbourhood Development Plan. In
particular, the proposals around the Bolingey Settlement Boundary.
Please see our attached letter for your consideration.
Yours sincerely,
Karolina
• Resp 05 - MOTP 05.pdf
08/05/2022 Standard initial reply sent
SG discussion summary:
MOTP 05 has made various submissions during our initial consultation (22 March) and the Reg 14 in April-June 2022 (his submission 27 May 2022). The objection argues for the extension of the Settlement Boundary (now called Development Boundary) along the southern edge of Bolingey to include land on both sides of Trevellance Lane, primarily on the grounds of permissions given in this area over the last twenty years. It is agreed that a reasonable person would judge the area to be part of the settlement of Bolingey. However the rationale for excluding it from the Settlement Boundary (now called Development Boundary) centres on the desire to preserve its particular character, especially the low-density of housing there, and the associated tree cover which contributes positively to the setting of the village when viewed from the surrounding hills. As with many issues, members of the SG discussed this specific case with the local planning authority (CC planning officers) and their view aligned with ours. Response: To retain the SB as proposed. NO ACTION REQUIRED

Consultee 8	
Туре	MOTP 06
Date	01/04/2022
Topic(s)	
Comments	Good Afternoon
	I just wanted to share my comments after reading the draft plan. I think in general the report highlights the main points which are needed to improve the neighbourhood and are great.
	I especially support the proposal to enhance the retail space and support the idea of ensuring buildings along the Main Street in particular maintain the facades and are painted in beautiful beachy tones such as those seen in st Ives.
	The awful colours of the Upper Deck, Newly repainted Twarnhayle and Seiners Arms are 3 examples of buildings which are a complete eyesore for the village and definitely bring the ambience of a Cornish coastal village down.
	The beautiful planting and gardens in around the town are fantastic and this should be carried through into the high street. Cornish palms planted in large planters all along the street would be my preferred option to elevate the existing space.
	Retailers & businesses should be made to keep their frontages looking good at all times. You only have to look above the small co op and see the weeds growing out of the gutters and the paint peeling off the window frames to understand how this can bring down the overall look and feel of the community.
	I particularly love the perranporth Christmas lights and encourage the parish council to ensure that perranporth creates an all year community environment and not just focus on the busy summer season.
	I also support the proposal for the removal of the parking outside the Tyarnhayle to support a flexible space for outdoor refreshments, upscale market stalls etc this would definitely improve the entrance way on the village.
	I look forward to knowing what the next steps are for the NDP and wish you thanks for actually looking at improving our beautiful village.

SG Response

2022-02-04

Many thanks for your supporting comments. We much appreciate them!

We will be holding an exhibition to show our proposals in Goonhavern Community Centre on Friday 22nd April from 7pm, as well as from 10am on the Saturday. The exhibition will also be in the Parish Rooms in Perranporth on Monday 25th from 7pm, as well as from 10am on the Tuesday 26th. We very much hope that you will be able to attend.

Kind regards, William Rogers

2022-05-08

Further to the email you had from William in our team, a note to let you know that we will consider all comments and requests for adjustments at the end of Regulation 14. Regulation 14 will run from Friday the 22nd of April, for 8 weeks, ending on Friday the 17th of June 2022.

We would like to reassure you that we have your comments on file and will consider them post the 17th of June. The NDP preparation process requires the Steering Group to maintain and submit to the Examiner a compilation of comments submitted during consultation and the decisions we have taken in response. This compilation will be published on our www.perranplan.co.uk website and the Cornwall Council website.

Consultee 9		
Туре	MOTP 07	
Date	17/02/2022	
Topic(s)		
Comments	Email to: clerk@perranzabuloe-pc.gov.uk, who passed it on to us: Dear Perranzabuloe Parish Council We are writing in relation to the Perranzabuloe Parish LDP. Myself and my wife own a small plot of land above Perranporth school and the Taylor Wimpey estate. (Edged in blue on the attached plan). The land currently is marked as being outside of the proposed LDP boundary, creating a noticeable indent in an otherwise consistent perimeter on the plan. We would very much appreciate your advice on how we might go about requesting that our land be included within the local development plans. The land was bought prospectively by myself and my wife in the early 1980's with the intention that one day we could build houses for our children on the site. Time flew by (as it tends to do) and our children have now moved out of town to more affordable parts of the UK. The field has become a popular place for our grandchildren to play football and ride bikes when they come back to visit. We were approached by a developer in 2018 who attempted to secure planning permission (working with Tim March at the County planning department). We were led to believe that the application was initially successful (with the county planners at least) but was later withdrawn to address a minor concern/ technicality raised by one of our neighbours over ridge heights. Subsequently, owing to a combination of factors (not least the disruption caused by Covid 19) the developer didn't resubmit the plans after the amendments had been made and early in 2022 the company he represented ceased trading. (The planning documents associated with that application are still viewable on the county planning porthole under PA20/00258). We are very keen to develop the site. We are currently working with a development expert to help us to move the project forwards once again. We would like to undertake any future plans in a way that respects the interests of our neighbours properties, is beneficial to the Parish community whilst still remaining attractive to a develo	
SG Response	08/05/2022 Standard initial reply sent See response to Consultee 44. A consultant regarding the same site and issue(s).	

Regulation 14 Consultation - Cornwall Council Planning Department Input

Cornwall Council Planning Department staff gave considerable technical support to assist the Perranzabuloe NDP Steering Group members in dealing with the longer, more technical and mainly professional submissions following the Regulation 14 and the Supplementary consultations. This support was given in numerous detailed email exchanges, and during two Zoom meetings, one lasting an hour. Issues covered included:

- judgements about the precise line of **development boundaries** (DB) and which kind of land uses should be included within the DB and at what stage of the build-out process should a planning approval be included within a particular DB: technical details concerning terminology such as 'adjacent to' versus 'outside' development boundaries: issues relating to the inclusion of the phrases 'small-scale infill' and 'previously developed land' in policy:
- whether the NDP is indeed 'more restrictive than the Cornwall Local Plan (CLP)' in terms of provision of housing sites.
- for the **Principal Residence Policy**: the adequacy and significance of initial data on the incidence of second homes and holiday lets: the wording of the policy, to maintain consistency with other NDPs in Cornwall: the need for a further consultation.
- proposal for a secondary school site in Perranporth: general approach and specific guidance on the policy for this area, the revised settlement gap between Bolingey and Perranporth

Regulation 14 Consultation - 8 weeks from 22nd of April '22 to 17th of June '22 - Comments

Consultee 10	
Туре	MOTP 08
Date	24/04/2022
Topic(s)	Policy H01 - Principal Residence Policy
Comments	It is great to see that the impacts of second homes and holiday lets are being considered by the NDP and I fully support the ambition of this policy to protect local people. Having recently received a no fault eviction from my tenancy and faced difficulty finding accomodation, I see protection of housing supply for principal residences as a crucial issue for Cornwall. However, I am unsure that this policy will created the desired outcome. By limiting new housing to principal residences, this may have the untended consequence of increasing demand for existing properties without the principal residence restriction - as seen in other communities such as St Ives. Would an alternative be possible: at the point of property sale/purchase, require a planning application if the property is not going to be used as a principal residence. This might be more effective at protecting the supply of houses for the local population, whilst funneling second home/holiday let investment into new developments which would may positively impact on the local economy.
SG Response	2022-05-06 - General thankyou and confirmation of receipt of comment, which we will consider. 2022-07-26 - SG view is that this is a very interesting suggestion that we are unable to consider as an NDP works within the planning system which doesn't allow the suggestion. NO ACTION REQUIRED

Consultee 11	
Туре	MOTP 09
Date	02/05/2022
Topic(s)	Multiple
Comments	I have read this document with some interest since I have recently moved back to Perranporth to eventually retire from the NHS. I was born and raised in Bolingey, my late parents, Rex and Julie Harper established deep roots in the local area. The NDP has much to commend it and I wondered whether it might be possible to add some serious pragmatic meat to the bones of its policy in some
	areas Policy HO2 - design of dwellings Whilst insisting on the use of passive technology and good insulation is a good step could we take this further by insisting that ALL new developments
	should: - Have solar panels with either/both feeding back to grid or battery back up - this development if widespread could help to reduce the need on fossil fuels and nuclear by smoothing out power supply during peak and trough periods. It would save money for residents, and help move us to net zero as soon as possible.
	- Have Air source heat pumps installed, and, in larger developments, ground source heat pumps installed to heat a number of/all homes being built. - Consider geothermal systems for large residential and industrial developments (this can be achieved in some cases by using existing mine shafts). - All new homes to have EV charging point as standard. Policy NE 7 - views and vistas
	Could this be extended that all developments, including rebuilds, should not significantly impact on the views of neighbours behind them? Policy NE9 - dark skies
	This is very welcome - could this be extended to consider a "switch off" of all street lights after 01-00? In addition there are some serious offenders in the village in particular a bank of lights on the back one of the hotels/apartment blocks on cliff hill and the flood lights on the installation on Penhale point. The preservation of our dark skies helps to reduce emissions and costs so its's a win, win all round. Policy TT4 - Safeguarding the disused railway
	Whilst this is a laudable and quite exciting plan the railway embankment has been subsumed into many of the gardens and buildings along Perrancoombe. It might be worth flying a drone along the route to see how viable the proposition to reopen it as a cycle path might be. I really hope it can be done, but it may be too late now. Thanks again for pulling this together, it has clearly been a lot of work and is looking good.
SG Response	2022-05-06 - General thankyou and confirmation of receipt of comment, which we will consider. 2022-07-13 - SG discussion summary: HO2: Building regulations are beyond the remit of an NDP.
	NE7: This is not something an NDP can stipulate. Our Design Guide did cover what it could in this general direction. NE9: This is beyond the remit of an NDP. TT4: We understand you can't build a cycle path on already developed land. The purpose of the policy is to protect the land for future potential use.
	NO ACTION REQUIRED

Consultee 12	
Туре	Local Business - Callestic Farm
Date	2022-04-19
Topic(s)	General
Comments	Further to your email below with reference to future development at Callestick Vean as a local business we would certainly consider releasing land for development. If you need any further clarification or a more formal reply please let me know. 2022-03-28 email to Callestic Farm from KH in the NDP SG: Hi Sebastian
	As we have discussed previously it has been the intention within the NDP to create where appropriate more all year round employment for residents in the parish. There are existing employment area or clusters such as Cligga and Station Road in Perranporth or Newquay Road and Bridge Road in Goonhaven. There is though limited scope in these locations to create anything new of any scale. According, we have shown 'preferred Indicative locations' for larger scale development in the draft NDP. The A30 works will create a highly accessible corridor well serviced by the existing road A 30 after it's de-trunked. Two areas in particular Trevisomme and Pendale/Callestick Veon are identified. I would like to be able to demonstrate to Cornwall Council and to the Department of Communities and Local Government inspector that we have landowner support that if an appropriate opportunity arose in the future, you would consider releasing land for development. I am approaching you as owners of the land indicated at Pendale/Callestick Veon location and would be grateful for your comments and for of those of your neighbours. All documents and background can be found at: www.perranplan.co.uk but the following link will take you straight to the draft plan: Perranzabuloe Community NDP 2021-11 – DRAFT Look at section 11.2.6 from page 107, Map 23 on page 109 and the policy BER 8 on page 110. By all means contact me if you need any clarification.
SG Response	SG 2022-07-13 discussion. Pleased to get a letter of support from a substantial Local Landowner for some of their land to be released for development for employment uses.

Consultee 13	
Туре	Local business owner and Local Landowner
Date	22/04/2022
Topic(s)	LGS designation - LGS 23
Comments	I have spoken to William Rogers on a couple of occasions regarding the change of the football field I created on land at St Georges to a Local Green space. I would like to remove our land from this consideration. Our intention is to continue to allow my football club (Goonhavern) who I served a number of years with not only as a player but as a youth coach to use our field for training purposes in order to enable the club to salvage and rest the only pitch they have during the summer season. I have also allowed the club to host a number of matches this winter along with use of our facilities for changing rooms. Without this they would have been unable to have a third team at the club. I also financially support the club season after season. I feel that advertising this as a local green space will bring an aspect on insecurity to my land and also the risk of people abusing and mistreating what is given to them. After witnessing incidents happening on other green spaces locally and also being a victim of theft from my own property I feel the gates will always need to be locked apart from when I or someone who I trust is allowed access. As always I will continue to support local sports teams/clubs as much as I can but in regards to security and use of my own land and business premises I feel that this will be completely in my control to avoid any problems or complications. Any Questions don't hesitate to get in touch,
SG Response	08/04/2022 Standard initial reply sent
	See further correspondence to and from this consultee.

Consultee 13	
Туре	Local business owner and Local Landowner
Date	29/09/2022
Topic(s)	LGS designation - LGS 23
Comments	I received a letter before the summer indicating the Perran Plans suggestion of turning the football field we created for the use of Goonhavern football club into a public green space. I was informed that if I didn't want this to happen I should inform the perran plan team by email at the earliest convenience and this would be resolved. I was then recently approached again by William Rogers who informed me that my wishes seem to have been ignored due to a possibility of a miss understanding of the designation of a public green space. As we operate a business from this premises it is unreasonable to allocate such a large area of our site to this designation. Who knows what the future holds regarding development or needs to diversify business especially with the uncertainty that recent years have thrown at us. The area in question is the flattest and most valuable area of our site which would ideally be used for camping if we didn't have the football pitch there. We currently have no intention of developing that area of our site and love being able to support one of our local teams with a large space to train, especially as our son has just joined the club. I hope this matter can be addressed asap and we can continue as we are without complicating a simple agreement of a private landowner lending the use of their land to a local sports team. Please get in contact if you require any further information.
SG Response	SG email reply: Dear Mr Chapman
	Perranzabuloe Neighbourhood Development Plan - Local Green Space Designation: St Georges Football Field
	Thank you for your correspondence objecting to the proposed designation of some of your land as Local Green Space (LGS) in the Neighbourhood Development Plan (NDP).
	There has possibly been some misunderstanding about the implications for landowners of this designation and we apologise if this is the case. This letter is intended to clarify this.
	We wish to reassure you that designation as a LGS carries no implications on you as the landowner, other than for future development ('development' as used in the Town and Country Planning Acts). Designation as a LGS simply means that future proposed development of the land would be much less likely to get planning approval.
	In particular we would like to stress that designation as a LGS
	- does not give additional public access rights other than on already existing public rights of way, such as footpaths, bridle ways and permissive paths does not imply any additional responsibilities, costs, or liabilities to the landowner in terms of land management.
	Some parties have confused the LGS designation with the term 'Open Space' or 'Public Open Space', both of which carry connotations of public access and use. This is understandable but unfortunate. LGS designation can apply to land with no public access (for information, look at the LGS designation part of Open space, sports and recreation facilities, public rights of way and local green space on the GOV.UK website. This supplements and expands information in the National Planning Policy Framework (NPPF), which is also available online).
	In our NDP survey, sent to every household in the Parish during the early stages of conducting our NDP work, we gained considerable feedback from Parishioners on many subjects about their wishes for the future. A very high proportion of the respondents from the Parish (95% plus) wished to protect

and enhance the beautiful environment and landscape we are all privileged to enjoy.

As such, the NDP steering group has made considerable efforts to identify Local Green Spaces in and around the Parish that we believe are of special value and beauty to the parishioners. Where these areas identified are not protected by other formal designations (such as SSSI designation), we have sought to propose them as Local Green Spaces. Designation of special areas of beauty and amenity simply provides protection of these areas into the future and will be very welcomed by the vast majority of our parishioners.

Having considered your request at length, we are still proposing to include your land for designation as a LGS in the draft NDP for Perranzabuloe Parish. We sincerely hope this letter provides reassurance about your concerns regarding LGS designation. However, if you still wish to object to the designation of your land as a LGS in the NDP, you will have another opportunity to submit your concerns when Cornwall Council hold their statutory consultation later this year, as the stipulated NDP approval process is followed.

We understand that when Cornwall Council holds this consultation, they will ask us to notify relevant parties, and we will endeavour to contact you at that stage. Any comments that you make at that stage will be forwarded to the external examiner, who will make the final decision about any disputes.

Consultee 13	
Туре	Local business owner and Local Landowner
Date	2023-05-05
Topic(s)	LGS designation - LGS 23
Comments	I was contacted today by a friend of mine who is another irate landowner who seems to have been unknowing/unwillingly dragged into this NDP project. As explained from the start the whole concept of this public green space has been completely misinformed/misinterpreted and to be honest a complete lash up. I'm currently seeking an update on my land as i have heard from other sources that some of the green spaces have been removed. I recently spoke with both Will and Darren from Goonhavern Fc to see if they had heard anything as i know Will had tried to contact Will Rogers to view his objections to the NDP, which they hadn't. I know that they are fully supportive of my decision if it comes to it but at the moment i feel as if i am being backed into a corner that would mean i would have to refuse the footballs clubs use of the ground for the upcoming pre season until this is resolved by the NDP. This would be incredibly detrimental to the football club which would pain me so much to have to do but i do have to look after my family's future first. Personally i feel that rather sending out informal letters or misinformed personal conversations maybe you need to arrange a meeting with all the landowners that will be affected by the NDP so we can find out what it all actually means and what our options are, if any?!
SG Response	2023-05-09 SG agreed email reply to Consultee 13: The NDP Steering Group has worked with external consultants who have worked on dozens of NDP's. We believe that the Local Green Space (LGS) site selection is in-line with what the community surveys say was wanted (consistent 90-95% of our community want to protect the natural environment, open spaces et). That the site selection procedure was also as required. As such I completely refute your assertion that it's been a "lash up". There was only one green space that was removed. This was because the land owner gave us information that meant it didn't fit the criteria. There has also been a Green Buffer that due to the Settlement Boundary (also known as a Development Buffer) being adjusted because of feedback, is moving, to instead becoming a LGS.

The whole NDP and so LGS designations is based on what is demonstrably desired by the majority of the community. Yes this can be at odds with what an individual person or entity feels is in their personal interests.

The NDP Steering Group is required to record and present to the external examiner what occurs between interested parties. That is why written correspondence trumps calls and meetings. As we have repeat said to you and all LGS land owners (and anybody else who has a comment on any aspect of the NDP) please look at the criteria for LGS designation. If you can find any reasons (other than you just don't want it and what could be interpreted as threats to the local community?) for the designation to not be applied, then that will be looked at by the Steering Group, the Parish Council, Cornwall Council and the independent examiner.

Part of the process has been that early on we had public meetings and public exhibitions (that were publicised and included detail and maps of the Local Green Space designations).

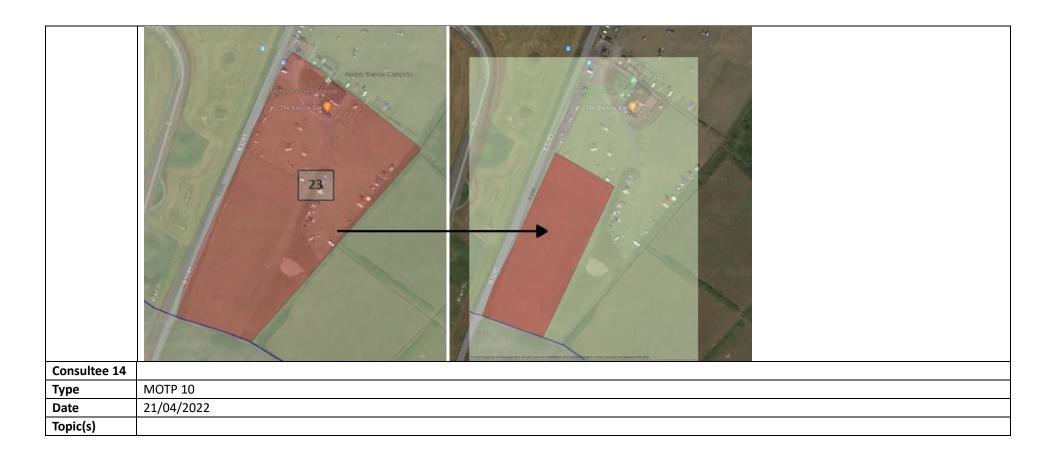
Having closed meetings +/or discussions with individual land owners as opposed to general, open to all public meetings +/or discussions may be against the key tenet of a Neighbourhood Development Plan, which is that it is based on what the majority of the community demonstrably want. These emails will be part of the public record for the Examiner and any parishioners etc to view.

In terms of what it means for landowners, as previous correspondence has laid out, it means that if any planning permission is presented regarding the land, it is less likely that this will be granted. If the intention is to continue using LGS proposed land as it is currently used then there is no impact.

If you were to refuse the football clubs use of the ground within this proposed LGS, that will have no impact whatsoever on the designation. We do however agree that this would be incredibly detrimental to the football club.

We live in an amazing parish with lots of land that has environmental, visual and amenity value. The community want this protected. That is what LGS designations do. As I said at the start, there is a demonstrably strong desire from the clear majority of our community to protect parish land that is fundamental to why so many live in and visit the parish.

Consultee 13	
Туре	Local business owner and Local Landowner
Date	2023-05-09
Topic(s)	LGS designation - LGS 23
Comments	I would like to clarify that the phrase lash up was used in reference to my experience with the misinformation between the representative from the Ndp and myself. That reference was not aimed at the Ndp project as a whole. What is the next stage of this project and when are we due to find out what happens? I know you feel what you are doing is in the best interest for the community however you surely must sympathise with how it must feel to be completely out of control on a decision that is made on your own land and business that you have worked so hard to create and establish. It would be a different scenario if it was one of choice but it feels like its being taken away from me. After takin a closer look at the area marked in red on our site plan on your website i would like to make note that the red area does include some of our already established electric hook ups and the lower side is our septic drainage field. So the line may need adjusting when submitting your plans.
SG Response	2023-05-18 SG meeting included discussion of this. Looking at the current Google Maps view of the site and SG taken photos in the preceding week, this lead to a search for planning applications that have occurred since this LGS was proposed. The SG conclusion was that there have been planning applications that mean it would be appropriate to reduce the LGS to cover the key sports pitch field. Correspondence from Consultee 13 re-enforces the value of this local green space, for the local area and local community.



Comments

Apologies, I wasn't sure if you are the correct person to direct my question to.

First of all, as a resident of Perranporth, I have taken a brief look at the Perranporth Strategic Master Plan document. It is impressive. I am in full support of all the proposals and will comment to that effect soon. These changes and the new Chiverton Cross junction would/will make Perranporth and the surrounding areas enjoyable and accessible by all, both in and out of season.

I just had one question. There is lots on landscape an open space etc. But I just wanted to know if the proposals for a new secondary school in Perranporth have been factored into that and the plan in general? By that I mean, since the announcement back in February 2021 (https://www.cornwalllive.com/news/cornwall-news/perranporth-secondary-school-4969293) I haven't heard/seen any update to the progress of that. I just wondered if a) the school is in fact still going ahead, b) where it would likely be located in Perranporth as I feel that would possibly impact on the master plan. Traffic consideration for example, with the proposed 1-way system to said site, and those children no longer commuting to Newquay/Truro; and also how wider pavements / more pedestrianisation of areas as per your plan would be vital as there will be many children in and around the town walking to and from the school etc where safety would be key.

I appreciate that the plans for the secondary school may fall out of jurisdiction or however it may be positioned, but was just keen to know if that has been considered in the plan and where it may be sited o tie it all together, or any insight you have on that.

SG Response

2022-07-26 - General thankyou and confirmation of receipt of comment, which we will consider.

Thank you for your email. I hope by now that you have received by post a synopsis of the Neighbourhood Development Plan, together with letter inviting you to the Exhibition to be staged at the Parish offices tomorrow evening (25th April) 7pm to 9:30pm) and Tuesday morning, 10am to 12:30pm. It would be good if you were able to attend.

The Masterplan for Perranporth is a visionary document showcasing ideas for the future of the Village, and hopefully will feature in 'way forward' discussions that will inevitably follow.

Unfortunately the issue of the new secondary school has not been formally announced, despite the roomers!

Should you wish to contact me further, please email, or write me again

26-07-2022

The site of the secondary school was announced after we started Regulation 14 process. We have had quite a few comments regarding the school, which, where these can be addressed by an NDP, are being considered.

Consultee 15	
Туре	MOTP 11
Date	27/04/2022
Topic(s)	New school re Perranporth to Bolingey Settlement Boundary
Comments	This looks really interesting. Sorry I couldn't get to the meeting. I'm really interested in the settlement boundary for Bolingey as don't believe it to be correct! The village sign is much higher up Bolingey road than you guys have it marked, and I would also understand the lane on Bolingey road which has been excluded to be included within the boundary of Bolingey I would also argue the houses on the northern side of that lane are Bolingey too. How would the residents of the lane go about contesting this.
SG Response	08/05/2022 Standard initial reply sent 26/07/2022 One of the Steering Group saw this consultee in the community and had a verbal conversation to explain what the Settlement Boundary means. The consultee consequently withdrew their comment and wrote back to confirm they support the tight Settlement Boundary. They made further comments (which are recorded below).

Consultee 15	
Туре	MOTP 23
Date	15/05/2022
Topic(s)	On consideration of the settlement boundary, it sounds like the tighter the boundary is in terms of running along existing properties, the stronger the protection of the gap between Bolingey and Perranporth is likely to be? If this is the case, I would then be in favour of the current proposal, as I am, and many of the Hendrawna residents are, desperate to protect the rural feel of the Northern fringe of Bolingey from encroachment by developers. Thanks, hope that makes sense.
Comments	15/05/2022 standard reply

Consultee 15	
Туре	MOTP 23
Date	25/05/2022
Topic(s)	Settlement Gap
Comments	Further to my previous email regarding the importance of a settlement gap between the villages of Bolingey and Perranporth, I would like to add supplementary comments in response to the recent plans announced for a secondary school in the Perranporth area. It has come to my attention that the proposed site identified is likely to be a field on eastern side of Liskey Hill, opposite the Liskey Hill holiday park site, and to the south of Bolingey road/Chapel Hill. Something that has been very clear from the public consultations throughout the NDP process, is that the settlement gap between Bolingey and Perranporth is something the local community feel is of considerable importance to them. I have serious concerns that if a secondary school were to be sited here, it would completely erode this gap, it's green corridor, and therefore the identity of two distinct settlements. I also have concerns on the impact on the settlement of Bolingey, which at present has a distinctly rural feel to it, and has remained largely unchanged in character for a long period of time. The construction of a large school site at the fringe of this village would be completely detrimental to the village and the surrounding quiet roads which pass through it. Chapel Hill, Mill Road and Penwartha Rd for instance would be used as a shortcut for vehicles on the school run, and at present are single width and really only used by residents. Liskey Hill itself, is already very congested during the period of the school drop off times each day. I am a teacher myself and have children who would be in the opening and early entry years of this secondary school, so am actually in support of a much needed secondary school within or near to our locality, however I am deeply concerned about the choice of this site on the community and settlements
SG Response	which it will be potentially serving. Standard email reply sent and 06/07/2022 SG discussion that this repeats concerns made my others, as well as also recognising the need for a secondary school and being in favour of the proposed new school. The comments are worth reading for the depth and nuance. The SG's response is the same as put for other raising concerns about the school.

Consultee 16	
Туре	MOTP 12
Date	27/04/2022
Topic(s)	
Comments	We write with our comments concerning the above as invited to do so.
	Unfortunately, we cannot be in favour of any future development in this area due to the fact that both Parish Councils and, in particular, Cornwall Council appear to be determined to destroy the rural environment and beauty of Cornwall as a whole.
	Having been born and brought up in Falmouth and watched how this once beautiful town has been destroyed by overdevelop and it appears a lot of the areas that have space to breath in are systematically being earmarked for development in one form or another.
	We moved to Goonhavern due to the beautiful countryside and lack of development and overcrowding so to now see that this area could be ruined as well is very upsetting indeed. All because both Parish and Cornwall Council put money above the environment. All the beautiful fields etc being
	destroyed to accommodate the new road network around Truro is disgraceful - all carried out because of the bottlenecks in the Summer months. Tourists come to Cornwall because of the landscape and environment and have accepted that their journeys may take longer as it is part of the charm of the County which is in danger of becoming like all other towns and villages in the country and not unique.
	You mention in your covering letter that you hope the Public Examiner will assess and hopefully approve the NDP - we sincerely hope they do not and that the local people of the area share our views and vote against this proposal.
	See later comment by this consultee
SG Response	NO ACTION REQUIRED. The SG feels the comments aren't aligned with what an NDP can and can't achieve.

Consultee 17	
Туре	MOTP 13
Date	28/04/2022
Topic(s)	Their lakes aren't fishing lakes
Comments	Many thanks for your letter dated 20th April 20222 regarding the above topic. Whilst we have two lakes on our property they aren't fishing lakes whereas our neighbours Perran Springs Holiday Park have three fishing lakes but I'm not sure if they allow non-residents access to them. Part of the area 12 is our land but the majority belongs to other parties. Please let us know if we can be of any further help to you.
SG Response	2022-07-26 Updated the NDP to remove reference to "fishing lake" in order to resolve any confusion.
Consultee 18	
Туре	Local developer
Date	02/05/2022

I have read through the plan and posters, good work to all involved In getting that lot together.
The settlement boundary is very tight to existing. Allowing only for infill sites, and renovation/ regeneration which is great to see.
The one way system in town is also a great idea. The Wheal leisure road is a bit narrow for two way traffic. I assume the shopfront pavements will be extended into the road and more 1hr parking spaces introduced. Plus loading areas etc.
Tree lining these areas is a great plan.
Affordable homes:
Will there be or is it in the NDPs ability to give actual Construction specs.
I believe that all these timber framed houses getting thrown up will not last the test of time. I would suggest a minimum requirement of ground floor to first floor being constructed in traditional methods. I.e. masonary inner and outer skin cavity walls. Then perhaps inner skin of 1st floor in timber, outer in masonary. There will be trouble with timber frame buildings being remortgaged in 20 years time. This is more of private owner issue, the same problems apply. In the long run, solid construction now will save on property management costs down the line. (Especially in damp Kernow.) Please spec to build long term smart not fast and cheap now. I am in construction, I would like to think I've learnt a few things along the way.
03/05/2022
Many thanks for your email. It is good that you have read our proposal. All comments will be taken account of following the official consultation period that closes mid June.
We then prepare the final documentation to be sent to Cornwall Council for scrutiny and examination
Also 08/05/2022 Standard initial reply sent
2022-07-26
Thankyou for the supportive comments. The issue of timber frame construction are beyond what an NDP can influence.

Consultee 19	
Туре	Statutory Consultee
Date	04/05/2022
Topic(s)	
Comments	Thank you for providing National Highways with the opportunity to comment on the pre-submission version of the Perranzabuloe Neighbourhood Plan. As you are aware, National Highways is are responsible for operating, maintaining and improving the strategic road network (SRN) which in this case comprises the A30 trunk road which passes along the southern boundary of the Plan area, and which is currently the subject of a major improvement scheme between Carland and Chiverton Cross. In general terms we consider that the plans proposed policies are unlikely to result in a scale of development that would adversely impact on the safe and efficient operation of the A30. With regards to specific policies, Policy TT2 is noted with regards to the plan's requirements for development to assess traffic impact, as are references in Policies BER 2,3, 6 and 7. However, with regards to Policy BER8 and the Business Opportunity Areas indicated in Maps 22 and 23 located north of the A30, whilst these are identified as preferred sites rather than allocations, due to their proximity to the A30 development in these locations may have the potential to impact on the A30. We will therefore expect any development coming forward in these locations to be supported by an appropriate assessment of traffic impacts which should consider the operation of the SRN in line with national planning practice guidance and DfT Circular 02/2013. Where proposals would result in a severe congestion or unacceptable safety impact, mitigation will be required in line with current policy. We would also expect development in proximity to the A30 to give consideration to potential physical impacts on the SRN (eg drainage or screening), again in line with the requirements of DfT Circular 02/2013. These comments do not prejudice any future responses National Highways may make on site specific applications as they come forward through the planning process, which will be considered by us on their merits under the prevailing policy at the time.
SG Response	09/05/2022 Standard initial reply sent
	and 26/07/2022
	Noted. We don't believe the NDP needs to change in response to these comments that are mostly about process, not the plan itself.

Consultee 20	
Туре	MOTP 16
Date	04/06/2022
Topic(s)	
Comments	Firstly, I'd like to thank members of the NDP Steering Group for all the many, many hours of work that has gone into producing the Perranzabuloe NDP. Please find below some observations for which there may be an obvious answer, but do appear to be conflicting. I have attached some NDP pdf files. Although Appendix 2 - Definitive Settlement Boundary Map and Appendix 9 - Local Green Space (Area 14 Nampara Walk) appear to tie up, when compared with Appendix 3 - Design code (CA3d St Georges East and Appendix 3 - Design code (Sub-division CA3d) there do appear to be some differences. CA3d St Georges East includes part of the Area 14 Nampara Walk and also only part of the ploughed field which is outside of the Settlement Boundary, yet the Subdivision CA3d appears much larger and also includes an area outside of the Settlement Boundary. Although I appreciate that the Perranporth Strategic Masterplan includes many ideas on how to introduce public realm enhancements, I would like to comment on the proposal to pedestrianise St Pirans Road in the summer months between 11am and 4pm, as it doesn't appear to take into consideration access to traffic for Ponsmere Road, the Dunes and also Perran Bay. Further to the ideas to improve building frontages in St Pirans Road there is very little to address the appearance of the Green Spine access (Perranporth Strategic Masterplan (Opportunities and Constraints). In my opinion, although there are good ideas to improve the feel of Perranporth, walking along Beach Lane you just see the backs of buildings and it is difficult to see how this could be improved in line with other improvements. I look forward to hearing about the progress of the Perranzabuloe NDP.
SG Response	 Resp 06a - MOTP 16.pdf Resp 06b - MOTP 16.pdf Resp 06c - MOTP 16.pdf Resp 06d - MOTP 16.pdf 07/06/2022 Standard initial reply sent and 26/07/2022 The design code areas have a different function to the settlement boundary, so there is not a conflict. NO ACTION REQUIRED The comments on the Master Plan vision would be considered by the required planning process. Further comments were sent in by the same consultee

Consultee 20	
Туре	MOTP 16
Date	17/06/2022
Topic(s)	
Comments	Please find below some further observations concerning the Perranzabuloe NDP.
	Local Green Space Map, p.65
	It seems to me that Map 11, Location of Local Green Spaces (page 65) is presented at a very small scale. In my opinion, it would be much more useful for readers – particularly those implementing the policy – if the map were larger, making it easier to locate the sites without having to resort to Appendices elsewhere. Given the space available across two sides of A4 in the draft you have consulted on, this could be achieved without difficulty, one would have thought.
	Lack of clarity in the Justification for Perranporth-Bolingey Gap,. p.53
	Given the imminent application for the new secondary school in this part of Perranporth, it seems to me important that the NDP makes as clear a case for the continued existence of the gap as possible. The main paragraph justifying the policy for this gap is unclear or confusing in several places. The reference to a panorama (third paragraph) as if it were a description of a photograph in the text is unconvincing. If you have a panorama underlining the visual significance of the gap, it would be useful to include it in the NDP. Additionally, the penultimate paragraph beginning 'During consultation' does not make much sense.
	It is also surprising that you have dropped the material in the footnote 78 of the previous consultation draft. This referred to the planning departments' view of the importance of this gap when considering an earlier planning application. Reference to this could strengthen the weight attributed to this NDP policy during consideration of future applications in this area, particularly at appeal.
	I look forward to hearing about the progress of the Perranzabuloe NDP.

22/06/2022 Standard initial reply sent

AND 06/07/2022

SG agree that we should amplify the reasons for a Settlement Gap between Perranporth and Bolingey. These include:

- The 2 settlements are distinct in their character, including but not limited to the type of buildings, nature of the roads and lane and heritage.
- The 2 settlements are currently separated by open land.
- The open land between the 2 settlements is a key appreciated feature of the general area.
- Building on this area would be overbearing on a lot of surrounding properties
- The public surveys at the start of the NDP process had the community giving exceptionally strong support <pull out and include the stats on this>
- The NDP public events had the public repeating the desire to keep the 2 settlements distinct and separate from each other.

Consultee 21	
Туре	MOTP 17
Date	03/06/2022
Topic(s)	
Comments	I would like to thank you all for producing the Draft Neighbourhood Development Plan, the Design Code and the Masterplan for Perranporth village. It is clear that many long hours have been spent putting the plans together by a team of well-informed, dedicated people who really care about their local built and natural environment.
	I have put together just a few comment, as I support most of the policies put forward. Please find my comments attached.*
	I wish you all the best with the submission of this plan to Cornwall Council and look forward to the policies being implemented in the future.
	• Resp 07 - MOTP 17.pdf
SG Response	07/06/2022 Standard initial reply sent
	and 26/07/2022 We note the support and general agreement.
	"Nansmellyn Marsh" is the Marshland alongside Station Road. That we have already identified to be protected. See Local Green Space 5 and 15. So NO ACTION REQUIRED
	In relation to the Coombes, we checked with the LLCA consultant we used who reverted that "the Coombes are such an integral part of character across the NDP area, not just Perrancoombe and Penwartha, that they are covered as much as need be in the overall landscape character policy. The Landscapes of Local Significance (LLS) areas were more those of distinct individual character or those with added heritage landscape value. NO ACTION REQUIRED.

Consultee 21	Dr Jenny Blunden OBE, Chief Executive, Truro and Penwith Academy Trust
Туре	Truro and Penwith Academy Trust (TPAT)
Date	07/06/2022
Topic(s)	Proposed new secondary school site
Comments	Please find attached the consultation response for Truro and Penwith Academy Trust.
	Resp 08a - TPAT.pdf
66.0	Resp 08b - TPAT.pdf
SG Response	2022-06-07 Standard initial reply sent
	AND 06/07/2022 SG meeting notes:
	Need to considering changing the NDP because of this new information re the proposed school site. Continue the conversation with Jennifer Blunden (Truro and Penwith Academy) and Coleen O'Sullivan at Cornwall Council, pre putting it into the next
	draft.
	The document from Truro and Penwith Academy Trust includes their point 8:
	"The location of the new school site (Annex A) shows that the land will be secure from future residential development and maintain a gap between the
	settlements of Perranporth and Bolingey with extensive landscaping and sports facilities ensuring an open and attractive school site."
	This echoes the view of the NDP Steering Group that the community want to maintain an open space gap between the settlements of Perranporth and
	Bolingey. SG to look at how the NDP can perhaps be modified to facilitate the school project progressing on this general site, with a view to also making
	sure the Settlement Gap is maintained and that landscaping is used to minimise the visual impact of the school as it will occupy a prominent position
	from many properties and well visited sites in and around the proposed site.
	We are assuming we will look to put a new set of policies to cover this.
	The document from Truro and Penwith Academy Trust includes their point 10:
	"It is requested that the settlement gap reverts to that as presented at the Community Consultation Draft stage. This matches Map 9 and the text of the
	NDP at 6.2.2i) of the Pre-submission draft."
	This is correct, one of the pre-consultation drafts had a slightly different Settlement Gap between Perranporth and Bolingey. This was, as can be shown by our own notes and emails between us, an oversight on our part. The correct, pre announcement of the chosen school site, is as per the Settlement Gap in
	the Regulation 14 Consultation version. As above, we are however going to look at all the comments and consider if the Settlement Gap should be
	modified given the new knowledge of the desired school location.
	The document from Truro and Penwith Academy Trust includes their point 11:
	"Finally it is requested that the new school I referenced in the relevant sections for community infrastructure to allow sustainable and coherent
	educational provision in the Parish for the long term."
	We agree with this and will look to do this. (Stuart to assist)
	Look at which policies get updated to cover this / thoughts on what to cover:
	- A sedum roof and the buildings will at no point be more than 2 floors above ground level, so that minimal visual impact on important views and vista's
	- Public transport (sufficient on-site parking, sufficient space for drop off and pick up)
	- Look at the design guide

- Traffic
- Dark sky's
- Community use of sports facilities being created. This should be considered at the design stage.
- Noise considerations.

Consultee 22	
Туре	MOTP 18
Date	30/05/2022
Topic(s)	
Comments	1) Policy NE9 Dark Skies. Street lights were installed in Perrancoombe about 30 years ago. There was no attempt to consult with local residents the majority did not want the awful yellow lights. The installation of the lights has made no contribution to our safety and security. Once the lights were installed Perrancoombe has had burglaries, criminal damage, anti social behaviour and numerous road traffic accidents. We would welcome the removal or turning off the lights to accord with the dark skies policy We might even see bats again.! 2). Policy TT8. Noise from developments at Trevellas Airfield. The noise from the airfield particularly from unplanned and therefore unlawful Motor Racing Activities from the Airfield damages the amenity of Residents of the Parish. Apologists for the Airfield on the Parish Council try to avoid taking any responsibility for the damage to amenity to Parish residents on the grounds that
SG Response	the Airfield is in St. Anes but this is untrue as part of the Airfield is in Perranzabuloe Parish. Also many of the adversely affected residents actually are Residents of Perranzabuloe Parish. Perranporth has become an unattractive place to live largely because of intrusive noise of which the Airfield is the main offender. If this Policy has any meaning it should be used to curtail or stop amenity damaging activities from the Airfield. R & L, Parish Residents for 46 years. 2022-06-07
SO NESPONSE	Thank you for these comments on the Perranzabuloe Neighbourhood Development Plan (NDP). We will consider all comments and requests for adjustments at the end of Regulation 14. Regulation 14 will run from Friday the 22nd of April, for 8 weeks, ending on Friday the 17th of June 2022. We would like to reassure you that we have your comments on file and will consider them post the 17th of June. The NDP preparation process requires the Steering Group to maintain and submit to the Examiner a compilation of comments submitted during consultation and the decisions we have taken in response. This compilation will be published on our www.perranplan.co.uk website and the Cornwall Council. AND 26/07/2022 Regarding Dark Skies, the NDP can't impact historic planning decisions. NO ACTION REQUIRED Regarding noise from developments at Trevellas Airfield, the NDP does address noise as far as it can. The current operation of the airfield and it's activities are not something the NDP, which operates via the planning system, can influence. NO ACTION REQUIRED

Consultee 1	Senior Development Officer - Cornwall Council / Planning and Housing
Туре	Statutory Consultee (Cornwall Council)
Date	27/05/2022
Topic(s)	
Comments	I still need to issue a final SEA screening decision report for the NDP. I note that in your Reg 14 version, you have taken into account the comments made by Historic England in relation to policy BER8, but that the comments that they made in relation to policy HE6 have not been incorporated. To address their concerns, would you confirm that you can amend the text of policy HE6 to read: 'Development proposals that would feature in any view to or from St Piran's Church or St Piran's Oratory, or would otherwise affect its setting must demonstrate that the asset, unrelated assets within its boundary, and its setting have been fully considered and that the proposals will not result in harm to their value or that of the surrounding landscape.
	Proposals which include elements that seek to conserve and enhance the features and overall value of the site and its setting will be supported in principle, subject to other development plan policies and material considerations.'
	This incorporates the principle of avoidance of harm and would address HE's concerns. In addition, it is very similar to the text in policy HE7 which aids consistency. If you can confirm that you are happy to make this change, I will issue the final HRA / SEA screening confirming that no additional SEA is required.
SG Response	SG Email thread discussed that all who commented (which is a majority of the SG) agreed this change made sense and strengthened the NDP. Consequent email to Colleen: Many thanks for your email dated 27th May. We are happy to amend the text of the policy No. HE6 as you requested.

Consultee 23	
Туре	MOTP 19
Date	30/05/2022
Topic(s)	
Comments	Thank you for sending the Draft Plan document and for staging the public exhibitions.
	We are happy with the general intention and progress of the NDP but would make a few comments as follows:-
	TRAFFIC AND TRANSPORT
	Suggest that the western part of St. Piran's Road could well be semi-pedestrianised throughout the year with access only for deliveries etc at limited times. This type of restriction seems to work satisfactorily in other places such as Redruth, Newquay and St. Austell, and might enhance shopping opportunities and street activities etc. not solely in the tourist season, reduce the conflict between cars and pedestrians, and enhance trade in that area. To compensate for the additional traffic that would be generated in Wheal Leisure, that road could relatively easily be widened to a better standard without reducing the adjacent car parking provision.
	Seasonal Park and Ride is a good idea in theory, but would it work in practice because of the amount of beach equipment that many motorists bring with them? Having said that, if Perran Sands were to introduce their own park and ride, that might considerably reduce the seasonal parking demand in the village.
	NEW SCHOOL
	Now that the approximate location of the new secondary school has been announced, this might affect some aspects of the NDP.
SG Response	2022-06-07 Standard initial reply sent
	AND 26/07/2022 Note the support. Yes the secondary school announcement will impact the NDP. NO OTHER ACTION REQUIRED

Consultee 24	
Туре	MOTP 20
Date	19/05/2022
Topic(s)	
Comments	I would like to express my support for the plan after reading the public exhibition posters. It is very well thought out and put together and I would like to thank everyone involved for their efforts. I particularly like the proposal of the primary residence policy and the introduction of the settlement boundaries with green gaps to reduce large developments in the countryside and ensure that those that go ahead are mainly affordable. It should also ensure that Bolingey and Perrnaporth for example maintain their separation and character. The designation of the local green spaces to protect them is well thought out and comprehensive and it is nice to see designations such as the bolingey flood channel, wet woodlands and railway land which are not as prominent as the clock gardens for example but still well used and appreciated. One suggestion and question I have is about the connection to the saints trail at the Rugby club linking to railway walk (and a potential future trail to St Agnes) using the existing cutting and bridge under Liskey Hill (shown dotted orange). I think this is a great idea and avoids crossing the busy roads, however it is within the settlement boundary and doesn't seem to be designated as a green space or protected from further development. There are already a number of houses built on this section constraining space so I would suggest adding something to the plan to try and limit further development on the railway alignment so that a multi-use route can be created more easily if desired in the future.
SG Response	2022-06-07 Standard initial reply sent
	26/07/2022 Comments noted. NO ACTION REQUIRED

Consultee 25	
Туре	MOTP 21
Date	16/05/2022
Topic(s)	
Comments	Goonhavern is not the pettiest of villages indeed the only assets are the old forge, the pub, the small park and the surrounding fields the latter of which are being eroded. You seem to want to dump all future developments in this area without any thought for local people apart from those involved in tourism. There is a serious a serious shortage of affordable housing but all that are being built are mini-mansions that only the wealthy can afford, and expanding tourism sites. People come to Cornwall for its uniqueness and beautiful countryside plus beaches, I know this because 54 years ago I was a tourist myself. My late husband's grandparents came from Falmouth and Penzance so we had an immediate affinity with the county. I have lived in Cornwall for 52 years and cannot bear to see the place being used only as a potential Blackpool of the south. Were I younger I'd be prepared to join any demonstration against any more desecration. Why can't you people on the council see that you have something very precious that needs nurturing otherwise it will be lost. Perhaps there are too many upcountry people on the county council who can't see the real reason that people love this area. I appeal to you to protect this area as I am sure that was the reason you were elected. I'm afraid I have never met any of you so do not know who I am addressing. No one as ever canvassed for my vote.
SG Response	2022-06-07 Standard initial reply sent 26/07/2022 Comments noted. NO ACTION REQUIRED
	This MOTP also made a (29/03/2023) comment to the Supplementary consultation.

Consultee 26	Parish Clerk clerk@perranzabuloe-pc.gov.uk
Туре	Statutory Consultee
Date	13/05/2022
Topic(s)	
Comments	In response to your consultation with us on 20th April regarding designation of Local Green Spaces, I can confirm that councillors considered this at their Full Council meeting on 3rd May.
	They were content with all of the proposed sites listed with the exception of Area 20. Please find the draft minutes of the meeting relating to this item:
	104/22/FC Response to Consultation on Neighbourhood Development Plan
	The Council had received a request to respond as a statutory consultee regarding the proposed designation of local green spaces in the Neighbourhood Development Plan. Members were content with all sites proposed with the exception of Area 20 – Ponsmere Valley Play Area. The intention of the council was to move the play equipment currently at this site to sit near the new skate park and provide a family setting. The current site would then
	lose its purpose and the council might wish to utilise the area as part of future development of the parish council offices for community use. Any designation could therefore restrict future plans. The council AGREED to request that Area 20 be removed from the schedule.
	Please let me know if you wish to discuss.
SG Response	15/05/2022 Thankyou, and please pass on our thanks to the collective parish council.
	As you probably know William is away this week. The NDP Steering Group will consider all comments and requests for adjustments at the end of Regulation 14. Regulation 14 will run from Friday the 22nd of April, for 8 weeks, ending on Friday the 17th of June 2022.
	We would like to reassure you that we have your comments on file and will consider them post the 17th of June. The NDP preparation process requires the Steering Group to maintain and submit to the Examiner a compilation of comments submitted during consultation and the decisions we have taken in response. This compilation will be published on our www.perranplan.co.uk website and the Cornwall Council
	AND 28/07/2022
	The area was designated as a local green space in relation to it's community value as a playground. Since we began Regulation 14, the playground has been condemned and closed. The email from the parish council makes it clear that they will keep the site for community use, but not necessarily as a local green space. Also the parish council is going to setup new play equipment on a nearby site.
	ACTION: Remove this local green space.

Consultee 27	
Туре	Local Landowner
Date	07/06/2022
Topic(s)	LGS 25
Comments	I am writing in regards to Area 25 which has been identified as land that could be designated as a local green space. I am a freeholder of part of this land and this is an area that has been in my family for generations and consists of marshland and a field. I strongly object to the designation of this as a green space and want a longer time to seek professional advice on this, as have only just heard about it from a letter received on 25.5.22.
SG Response	2022-06-07 - Standard reply sent SG later discussion. No further comments were received from this local landowner. The SG still feel the designation is aligned with other LGS designations, so NO ACTION REQUIRED. 02/09/2022 WR sent them a further standard letter regarding Local Green Spaces. We have had no further response from this local landowner.
	As with all LGS designations please see the table and template letters above.

Consultee 28	
Туре	MOTP 22
Date	31/05/2022
Topic(s)	

Comments

Firstly I'd like to mention I am not against a new school. I live In the nearest house Black Adder, to this proposed school.

I also feel that the settlement gap between Bolingey and Perranporth, needs to remain. And be protected, which was made very clear through the NDP consultations with the local people. Please keep the gap.

Another issue is going to be Liskey hill at school, drop offs and pickups, this road is already a nightmare to drive up and down during these times. And there's only a Primary school on the Hill. Even driving out of Chapel/Bolingey Road is dangerous. (Cars parked on both sides and even down Bolingey/Chapel road)

Bolingey is a quiet village, and this school will change all of that. The quiet single lanes will become much busier with the school traffic. It would be a huge shame to change the village feel of Bolingey.

I hope you consider my view on this matter.

SG Response

07/06/2022 - standard generic reply

AND 06/07/2022 SG discussion notes:

The SG is of the view that the clear majority of the community want to keep the Settlement Gap.

The issue of vehicle and pedestrian traffic are concerns.

Could a School Zone be created around the school re traffic speed and control during key times of traffic to and from the school?

People walking between Bolingey and the new school should be able to access the school site as soon as possible when walking up the hill, so that they do not have to walk all the way up/down Bolingey Road / Chapel Hill.

This could tie in with and updated transport plan.

We will look to see if we can encourage the school to have sufficient parking for all who work there. Effective drop off and pick up systems for private vehicles and buses. This is normally part of a Travel Plan for the school.

Stuart to look and revert to the SG re these aspirations.

TT2, add in "education"

Consultee 29	
Туре	Local Landowner
Date	28/05/2022
Topic(s)	LGS
Comments	We received your letter dated the 25th of May 2022 regarding the designation of local green spaces. Alongside my wife, we are the freeholders of the land identified as 27 on your map. Prior to receiving your letter we were not aware that this land was being considered for local green space. We have attached an up-to-date map of the land in question, as you can see there is no public right of access. It is private woodland, which to date we have permitted the local Scout Group and selected dog walkers to use. Designation as open green space does not confer any additional access rights, as stated above there is no public access. We would like to see the Council's full justification as to why they think this private land should be designated local green space, when there is no public right of access. I would like to be very clear. We do not consent to the designation of the land, area 27 on your map, as a local green space.
SG Response	See later responses below

Consultee 29	
Туре	Local Landowner
Date	15/06/2022
Topic(s)	LGS - Wheal Anna Woodland
Comments	Thankyou for your discussion on the phone. Further to the below email which I have copied in for the sake of continuity. We discussed the area as described below and you informed me that the proposals made are not enforceable. You asked that I put in writing the fact that we do not wish to offer our land to the scheme. It is my understanding that the email below dated the 28th of May states this clearly but for the avoidance of doubt. We do not at this time agree to any change in the designation of our land. We reserve the rights as freeholders of the land to take all decisions related to this land available to us in accordance with the applicable laws and do not agree to any limitations of our rights at this time or in the future. You explained that there is no other process to lodge our comments and that an email would suffice, if there is any further documentation or process needed to ensure our land is removed from this scheme then I ask that you inform me at your earliest convivence. I look forward to a confirmation email that the above and below has been logged and that area 27 has been removed from this process. Many thanks for your time .
SG Response	SG discussion. We understand that these Local Landowners have been to express their view to a Perranzabuloe Parish Council meeting. We, 09/2022, sent them a detailed letter explaining Local Green Space designations and the ongoing NDP process which will allow them to make further representations. A copy of this letter is attached. The same letter was sent to all proposed LGS landowners and is attached. No criteria based arguments were presented from these landowners which suggested the SG should change the designation. NO ACTION REQUIRED. Please see the standard letters and table re LGS correspondence above.

Consultee 30	
Туре	Local Landowner
Date	26/05/2022
Topic(s)	LGS
Comments	Thank you for your letter of 20th April, 2022, regarding the area you identify in the draft NDP as Bolingey Channel Walk. A portion of the land outlined is in the freehold co-ownership of my mother, on whose behalf I am acting, and my uncle, Mr Jeffrey Tredinnick of Driftwood, Bolingey. This land falls into two distinct parcels – A) the portion comprising the flood channel and the railway embankment, and B) the meadow adjoining Mill Road, between the flood channel and Kernick, my mother's house. Both portions are in private ownership and not open to the public, despite an informal path operating over part of A. Both portions of land are currently in the process of being sold. Portion A will become part of the proposed Saints Trail cycle path, and will thus be open to the public for community benefit. Portion B will remain in private ownership and thus not suitable for designation as a local green space.
SG Response	07/06/2022 standard reply sent to the landowner. 09/2022 this (and other SG) landowner were sent the more detailed letter explaining LGS designations. The Perranporth to Goonhavern cycle path is now through the area, which in the view of a brief SG discussion makes the designation more important. SG agreed to return to discussing this. (see later SG comments that also looked at further representations received).
	See further responses from this consultee below

Consultee 30	
Туре	Local Landowner
Date	23/03/2023
Topic(s)	LGS 3 - Objection
Comments	Dear William,
	Please find attached a letter setting out our objection to the proposed designation of a portion of land within LGS3 Bolingey Channel Walk. I am sending
	two files - our letter of objection with the accompanying figures as a separate file so that they are easier to view alongside the letter.
	Resp 33 - LGS3_objection_TEXT.pdf AND
	Resp 33 - LGS3_objection_FIGURES.pdf
SG Response	SG discussion 04/04/2023 summary:
	Yes, we are aware of no archaeological value to the land.
	No, the richness of wildlife is extensive and unique. The submitted photographs are accurate but do not we feel represent a complete picture of the area that includes woodland, scrubland, gorse etc. that is next to a waterway and so unique and diverse in terms of the wildlife.
	The "recreational value" argument is only valid if you ignore, which we do not, the value of looking at land, landscape, wildlife etc. on land that you do
	not necessarily occupy. ie Public access is not a determinant of land being or not having recreational value. That the cycle path now goes through this
	area, we feel increases the recreational value of the land.
	Conclusion: NO ACTION REQUIRED.

Consultee 31	
Туре	MOTP 24
Date	05/05/2022
Topic(s)	Mining
Comments	Further to meeting you at the recent NDP exhibition in Perranporth, as promised, I attach some information relating to Mineral Safeguarding Areas in Perranzabuloe Parish, and some text that might usefully be inserted in the NDP somewhere. Feel free to abridge, or edit, as you see fit, but hopefully this is helpful. Please let me know if you have any queries.
SG Response	2022-05-05 Thank you for your input. It is most useful. We will be examining this, as well as other inputs at the end of the formal consultation period which be in the middle of June.
	28/08/01, post SG meeting RJ emailed Colleen at Cornwall Council about the idea of protecting access and areas around mines. The concern is that non mineral extraction development occurs that down the road prevents access or around a mine space that is needed to develop a mine. How is this currently covered and managed. What (if anything) could our NDP add to give extra protection.
	The policy map that is referred to does have development zones that are expansive around recognised mineral sites.
	Colleen replied that "it's not necessary for the NDP to contain any additional policy or information on Minerals Safeguarding as the LP/DPD policies are robust enough to protect the mineral resource. Any policy that you have, would merely repeat those safeguards and we would advise against to avoid repetition." So NO ACTION REQUIRED

Consultee 32	
Туре	MOTP 25
Date	25/05/2022
Topic(s)	
Comments	I would just like to express firm support for the introduction, implementation and enforcement of a 20 mph speed limit and physical traffic calming measures throughout Perranporth.
	I have shared, along with many other residents, long-term concerns regarding vehicles speeding and unsafe driving on our local roads all year round as well as during peak holiday periods.
	Having lived on Liskey Hill during the past 3 years, I have witnessed multiple incidents, on a regular daily basis, of cars (many driven by local people) racing up and down at ridiculous speeds even when the 20 mph School Zone Speed Limit Sign is active and flashing.
	I realise that Speed Cameras & Enforcement may be outside the immediate remit of the Parish Council but is there maybe a possibility that suitable camera technology could be added to one or both of the existing powered speed limit signs to help minimise and control the problem?
SG Response	2022-06-07 standard reply sent.
	AND 2022-07-28
	Thankyou. The NDP team have been advised that this is an area the parish council are looking at. We however can't do anything to support this because of what an NDP can and can't do. NO ACTION REQUIRED

Consultee 33	
Туре	MOTP 26
Date	01/05/2022
Topic(s)	
Comments	Can you please tell us if there are any development plans regarding the field behind Grannys Lane and the new development on Seaview Crescent? Can you please forward this to the appropriate person if you are unable to deal with this.
SG Response	2022-05-04 holding email that being looked at and then 2022-07-28 email that "The NDP team aren't aware of any development plans in this area. The on-line Cornwall Council planning portal or directly contacting Cornwall Council might reveal information we don't have." NO ACTION REQUIRED

Consultee 34	
Туре	Local Landowner
Date	31/05/2022
Topic(s)	
Comments	31-05-2022
	Please can someone contact us asap regarding a letter we've received regarding the above subject – Xxxxx on 07801 xxxxxx or Xxxx 07972 xxxxxxx. Many
	thanks
	2022-05-01
	FAO William Rogers
	Thank you for contacting me via post and phone to discuss the plan to consider an area of my land for Local Green Space (Wheal Anna Heath 26) As
	discussed please can you remove it from the plan as we would prefer to keep this land for private use. There is a popular footpath running alongside the
	land and we have provided seating outside our property for walkers to enjoy the view over the pond. Please can you reply to confirm you have received
	this

2022-05-01

Dear Mr xxxx

Thank you for your email. We will remove your land (area 26) from the listing of Local Green Spaces for Perranzabuloe.

Regards

William Rogers.

2022-08-30 standard letter sent to this landowner re the grounds under which land is considered as an LGS or not and therefore grounds for asking land to not be removed. No further response received from this landowner.

SG 2023-04-20 decision that this landowners should be sent a further letter / email saying that we have not heard back from them as to the rationale for LGS designations, to which they have not responded. As such the land is still being put forward to be a Local Green Space. Should you wish to go through the criteria and respond to the examiner as to why your land should not be included, that will be an option open to you.

We believe this is the same / shared landowner (husband / wife ...) as Consultee 58. So in addition to looking at the standard letters and table re LGS correspondence above, please also look at additional correspondence with Consultee 58.

Consultee 35	
Туре	MOTP 27
Date	09/06/2022
Topic(s)	
Comments	I note that the response time under regulation 14 as per Cornwall web site is now 17th June, i have amended the attached form accordingly.
SG Response	10/06/2022 Standard initial reply sent
	AND 2022-07-28
	Thankyou for the general issue and practical suggestion.
	However, parking spaces are unfortunately a highways issue, that we are unable to influence.
	NO ACTION REQUIRED
	Regarding the pitches of new buildings or extensions, Cornwall Design guide does deal with roofscape. Our own design guide repeats the general
	concept in the Cornwall Design guide that buildings should generally blend in which includes roof pitches and elevations.
	NO ACTION REQUIRED

Consultee 36	Perranporth Golf Club via Jody Jeffrey at Red Planning, Email: jody@redplanning.co.uk
Туре	Statutory Consultee - Local organisation (Perranporth Golf Club)
Date	09/06/2022
Topic(s)	Golf Club
Comments	Letter sent in via Jody Jeffrey, Chartered Town Planner,
	Red Planning Ltd
	Dear Perran Plan Please find attached reps prepared and submitted on behalf of the Perranporth Golf Club in response to the Draft Perranzabuloe NDP (Reg 14).
	Please note our willingness to engage with the steering group and meet to discuss the representations.
	Kind Regards
	Jody
	Resp 11 - Golf Club.pdf

10/06/22 Standard initial reply sent

28/07/2022 and subsequent SG discussions:

SD1 comment.

The respondent objects to the line of the SB running south of Ramoth Way, and (1), argues that it should run along the north side of that road including the developments there, and (2), that the SB should include two undeveloped parcels of land without planning permission, one at each end of Ramoth Way.

(1) This argument is accepted, on the basis of the rationale considered elsewhere in this document, covering objections by Mitchell/Influence Planning on behalf of Burrell et al..

Response: Move the line of the SB to include developed land north of Ramoth Way, as detailed elsewhere check.

(2) The contention is rejected on the following grounds. Considering first the NW end of Ramoth Way, an application for a substantial part of the parcel here was the subject of application PA20/04807, 'Land North of Former Dune House, Ramoth Way'. This was refused by CC in 2020, because it would result in an extension of the urban form into the countryside, contrary to Policies 2 & 3 of the CLP, and for other reasons. To include this parcel within the SB would run counter to the arguments in that decision. The other parcel at the SE end of Ramoth Way lies in open land adjacent to Budnick Hill. It would be inappropriate for us to extend the SB to include that area before site-specific consideration is given to its suitability through the normal planning application process.

Response: NO ACTION REQUIRED

SD2 comment. Broadly the comment re SD2 is already covered by HO2. We will update all references in the NDP to reference "the latest Cornwall Local Plan Design Guidance". ACTION TAKEN

HO2 comment. AGREED, WILL IMPLEMENT.

H05 comment. The SG discussed reasons for the 500m on level ground. The views were that it should be kept. We looked at Active Design (which is referenced in our NDP). Our policy is in line with this. NO ACTION REQUIRED.

NE1: The public surveys were all strongest on the areas of protecting the environment. This policy is backed by extensive evidence. NO ACTION REQUIRED

LW2. The suggestion is not a minor modification. If clubs and sports organisations aren't sufficiently supported by the local and visiting community that is not grounds for an NDP to facilitate developments through the planning system. A key part of the NDP is to protect the locally valued land and environment. NO ACTION REQUIRED.

BER2, BER4, BER6 - Thankyou for the support. NO ACTION REQUIRED

BER7: This policy does gives sufficient opportunity for Small Scale Business Initiatives within and beyond the proposed Settlement Boundaries. NO ACTION REQUIRED.

BER8: The policy does give sufficient allowance in the areas indicated. Feedback from other parties suggest no conflict with the Cornwall Local Plan Policy 5. NO ACTION REQUIRED.

TO2: Thankyou for the support. NO ACTION REQUIRED

Anthony Plumbly MRTPI, Department of Education, Regional Planning Lead (SW England), Free Schools, FE & Skills Operations and Infrastructure Group
Department of Education
10/06/2022
Proposed secondary school
Please find attached representations to the Perranzabuloe NDP Reg 14 consultation document.
We would be very happy to discuss any part of the representations and would welcome a meeting to discuss the delivery of a secondary school in the
NDP area.
(Later 22/06/2022 email) With apologies – it has come to our attention that due to extensive delays with Land Registry queries at the moment, the plan provided as an Appendix to the representation was slightly incorrect. I have attached a revised version with the corrected plan. Would it be possible to replace the previous version submitted with this version please?
Resp 12 - DofE.pdf
10/06/2022 Standard initial reply sent. Also replied (same day) to the 22/06/2022 re updated map: "No problem. Thankyou for the updated (corrected) plan version which I've put in our records for consideration."
AND 06/07/2022 SG discussion: In relation to point 12, 13 and 17, please see our response to Truro and Penwith Academy Trust (TPAT) letter.
It is great to read point 14. Re point 21, agree it would make sense to reference delivery of the school in the Delivering Infrastructure section of the NDP. Same with point 22, add in a reference to the school, as it is now known.

Consultee 38	
Туре	MOTP 28
Date	16/06/2022
Topic(s)	Proposed secondary school
Topic(s) Comments	I have been given this email address by another concerned resident, but have no idea if this is the correct platform to voice my opinion on the proposed Perranporth School site. However, I am writing to express my concern for the proposed development of agricultural land adjacent to Chapel Hill and Liskey Hill Perranporth to build a new secondary school. Since moving to Cornwall two years ago, it appears there are dark forces at work to undermine the natural landscape of the county with little or no regard for the people who live here. Plans appear to be proposed, without public consultation and a clear mandate for debate and involvement of local residents. The Perranzabuloe Neighbourhood Development Plan (NDP) appears to be a Facebook page of information which is neither clear or provides a vehicle for opinions which would be taken into consideration. The proposed development site is, as stated, an agricultural field. Building of any kind would entail a comprehensive infrastructure programme to include: water, sewerage, power, telecommunications etc. The associated earth movement would be catastrophic to the small hamlets and villages surrounding this area. Disruption of natural water courses could result in flood risk increasing further down the Penwartha valley. The roadways are not feasible for the construction traffic involved in a project of this size. The noise associated with piling or foundations would have a detrimental effect on the wildlife, neighbourhood and peace and tranquillity we currently
	experience, not to mention the noise of a working school and the traffic generation related. The effect on mental health of local residents is unfathomable! If plans were to be approved and a school located in this 'field' the value of surrounding houses would be severely impacted causing a dramatic fall in their value. Land adjacent would be under threat of further major development and the once quiet and respectful area of Perranzabuloe would be no more. It beggars belief that a proposal of this kind would even get to the planning stage. As previously stated, the dark forces at work within Cornwall to develop rather than preserve and respect our environment is all the more evident. I would appreciate a response and an explanation why this proposal is not common public knowledge for debate by local residents, but appears to be surreptitiously approved before residents have had a chance to voice their protest.

2022-06-20

Thank you for these comments.

We can only consider your comments in relation to the in progress Perranzabuloe Neighbourhood Development Plan (NDP).

You may wish to make your feelings known to Cornwall Council if the proposed school on the outskirts of Perranporth reaches the planning application stage. Something that is beyond our remit.

We will consider all comments and requests for adjustments to the NDP at the end of Regulation 14.

Regulation 14 ran from Friday the 22nd of April, for 8 weeks, ending on Friday the 17th of June 2022.

We are now collating all of the comments to begin considering them all.

We would like to reassure you that we have your comments on file and will consider them. The NDP preparation process requires the Steering Group to maintain and submit to the Examiner a compilation of comments submitted during consultation and the decisions we have taken in response. This compilation will be published on our www.perranplan.co.uk website and the Cornwall Council website.

06/07/2022 SG discussion:

Although the sentiments expressed are no doubt shared by others, the clear majority of comments we have had are in favour of a secondary school, with what we see as sensible caveats in relation to, but not limited to, the Settlement Gap between Perranporth and Bolingey, traffic, visual impact, light impact (dark sky's policy).

Consultee	Laura Potts MRTPI, Planning Consultant, 07789 507218, laura.potts@cad-planning.co.uk
Туре	Consultant for Local Landowner
Date	16/06/2022
Topic(s)	Goonhavern Settlement Boundary & Goonhavern Green Buffer
Comments	Please find attached our comments on your Draft NDP (Regulation 14 Document). I believe the deadline for comments is tomorrow. I would be grateful to receive confirmation that you have received these comments within the consultation timeframe.
	Resp 13 - CAD Planning.pdf
SG Response	20/06/2022 Standard initial reply sent
	Later SG Discussion:
	CAD Planning on behalf of the owners argues that:
	(1) since the application PA20/01101 on this site for 30 dwellings was approved in autumn 2021, the site should be included within the SB. Since this approval was a standard one under Policy 8 with Affordable Housing of 30 (and not a Policy 9 Exception site), there is no reason to exclude this new site from the SB. (The SG was advised that we do not include newly permitted and work yet to start sites within a SB in cases where the conditions imposed were more stringent than any site enclosed within a SB, on the grounds that a developer could re-apply once the NDP was made and avoid those stringencies.)
	Response: include the approved site within SB, running the SB along line of the outside of the new hedgerow at the eastern end of the housing area. (2) A request is made to include within the SB the school and playing fields adjacent to the approved site. According to the criteria for defining SBs (3.4), it would be reasonable to include the school buildings (and presumably the car park) which lie on the periphery of the settlement – criteria 1 & 3. But the grounds should be excluded under criterion 5. (The tarmacked netball areas extending into the open area to the east of the school buildings should also be excluded on similar logic.)
	Broader arguments support this approach. Given the layout of the parcels of land, to do so would be likely to give support to future development proposals on the parcel of land to the north of the approved site and immediately east of the school. In the light of the force of feeling expressed against further development in the village during our consultation, it would be inappropriate for this part of the NDP to run counter to those wishes by including the grounds within the SB (with possible implications for interpretations of Policies 8 & 9 of the CLP, which the SG do not want to pre-judge). Response: to extend SB to include the school buildings and car park but to exclude the playing fields.
	(3) Consultee objects to the inclusion within the proposed Green Buffer of part of the site that has planning permission for housing. As the inclusion of this site within the SB is proposed above in point (1), the exclusion of the housing part of the site given planning permission under PA20/01101 from the Green Buffer would be sensible.
	The part of the site along the southern and eastern periphery that is delineated as green space or suchlike in the planning permission should be retained within the Green Buffer area.
	Response: re-draw green buffer to exclude approved site, but retaining within it green areas on the most recent planning approval. (4) A proposal is made regarding extension of the Green Buffer proposed in the consultation draft, probably in connection with the desire to gain planning permission on land adjacent to the current housing site and the school. The NDP team is not in a position to negotiate on this matter, and will

raise the offer with the Parish Council. Response: NO ACTION REQUIRED

Consultee 40	
Туре	Local business & also Local Landowner
Date	16/06/2022
Topic(s)	LGS 12 – Perran Springs
Comments	We are raising an objection to the allocation of part of our holiday park, listed as a Local Green Space in the Draft Document (Reg 14 pre-submission) of the Perranzabuloe Neighbourhood Development Plan (NDP), for the reasons listed in the following attached large pdf file (9.1MB). Please acknowledge safe receipt of this email (by return via email), together with the (12 page) pdf file attached above, which lists the reasons for our objection.
	Resp 14 - Perran Springs.pdf
SG Response	20/06/2022 Standard initial reply sent
	General SG discussion and comments: The SG believe that the site has changed hands from those who objected. That it is now owned by Park Leisure who own Oyster Bay Holiday Park (a site on the opposite side of the road to Perran Springs in Goonhavern). Perran Springs is subject to a current planning application PA22/03090 submitted in 2022. This application was consider by Perranzabuloe PC planning committee in January 2023 and a recommendation of refusal was made. The NDP steering group still believe the designation of this site as a LGS is appropriate and meets the necessary NPPF criteria. An LGS can be designated on land that is in private ownership, in fact many of our proposed LGS sites in the Parish are in private ownership and this site is no different. An established 'Public Footpath/Permissive Path' runs through this proposed LGS, as such the proposed LGS has amenity value and can be enjoyed by residents of and visitors to Goonhavern.
	Considering the specific points raised:

Regarding Section "1. We have not knowingly been individually notified as landowners."

We did not finalise all the areas identified as Local Green Spaces (LGS) within our NDP draft plan until late January 2022 after extensive investigation, site visits and digital mapping. After this point we made extensive efforts through our NDP secretary to contact all landowners in question in writing with a standard letter we have used to explain the process.

The letter acknowledge that they were contacted by a third party in conversation that part of your land had been designated as a LGS in late February 2022, we assume this was from all of our efforts to inform all landowners.

Also, a letter informing the landowner, Mr A Thomas, was received by him on the 28 May 2022, as acknowledged later in the letter of objection. We know this from correspondence received from Mr A Thomas. At the same time as the letter was sent out to Mr A Thomas, we posted letters to the 2 other identified landowners. One of these was a letter to the owner of the parcel, as shown on the map shown in Section 4, with the markup "Neighbours Land and Lakes (not owned by Perran Springs)".

Regarding Section "2. We are listed incorrectly (together with an adjacent neighbours separate lakes and another small strip of land) as 'Goonhavern Fishing Lakes'.

We will change the name of the proposed LGS to 'Goonhavern Lakes and Meadow' and thank the landowners for pointing out our inappropriate name for the site.

Regarding Section "3. We also believe there has been a case of mistaken identity."

It is not a case of mistaken identity as suggested in the landowners letter of objection. We can confirm the proposed LGS designation relates to the site identified that includes Perran Springs Lakes and Lake Meadow.

The maps from the Regulation 14 consultation that have been presented as part of these comments show that the land has been correctly identified. The issue of public access to the lakes for fishing is not relevant to our proposed designation. Anybody using the established 'Public Footpath/Permissive Path' runs through this proposed LGS, as such the proposed LGS has amenity value from looking out over the land in question, which includes the lakes. This land can be enjoyed by residents of and visitors to Goonhavern.

Regarding Section "4. Existing use of the allocated land (when the holiday park is open)."

We thank the landowners for their clarification of how the land including Perran Springs is currently used but still believe its proposed designation as a LGS is valid and would be welcomed by parishioners in Perranzabuloe (which includes Goonhavern).

Regarding Section "5. Existing use of the allocated land (when the holiday park is closed)."

As previously stated the name of the proposed LGS will be changed to Goonhavern Lakes and Lake Meadow. The proposed LGS has a public footpath that runs through the site and as such is accessible by the public in and around the Goonhavern area. We disagree with the owner's assertion that the designation of this site as an LGS is negligent, we believe the site meets more than one of the NPPF criteria for LGS designation and would be welcomed by most residents in Goonhavern. This is supported by the general findings of our Parish wide survey in 2018, prior to the preparations of the NPP for

Perranzabuloe, when 97% of respondents wanted us to protect the existing 'landscape and environment' for future generations. The designation of a site as an LGS does NOT imply public rights of access and does not impose restrictions on how the landowners can use the land, other than preventing development of the site. As previously stated the issue of access to land is not a requirement for LGS designation.

In relation to the quote from the NPPF, it only gives examples and is not specifically prescriptive. Recreational value does not require access.

Regarding Section "6. Future development of the land allocated as a Local Green Space."

The planning application referred to in the owners letter of objection is still live and will be considered by Cornwall Council in due course. It was however considered by the Parish planning committee, they recommended refusal in January 2023.

The letter refers to a person whom is a near neighbor to the proposed site and who was a member of the NDP team and as such asserts that this is a potential conflict of interest. The person in question was a member of the NDP steering group in the early stages of our NDP process, however for personal reasons they resigned from the NDP team. This was several years ago. As such there is no possible conflict of interest arising. The suggested designation of this site and all other sites in the Parish as possible LGS's was made by three existing members of the steering group working cooperatively as a small team in late 2021 and early 2022, at least 2 years after the person in question had left the NDP steering group. There was NO conflict of interest.

In relation to the underlined part of the background paper, the "commentary" column is there to "inform appropriate policy consideration". That column was not designed to be definitive in a "yes" or "no" way with regard to the designation to be proposed.

We do agree that the website could be clearer in identifying members of the SG - those who have previously been involved, and those who are still involved. The SG will get this improved.

Regarding Section "7. The whole field is allocated as a Local Green Space."

We do not agree with the assertions made in (7) above for the reasons presented in our responses to the points of the letter above. We believe that the proposed designation of Goonhavern Lakes and Lake Meadow (that includes Perran Springs and other surrounding land) is justifiable according to NPPF guidelines and criteria. Parish Council planning meetings have historically had local residents expressing a desire to protect the character and amenity value of the site. The May 2022 NDP public meetings that had posters of the proposed Local Green Spaces, were well received by the public who attended.

Regarding the "In Conclusion"

It should be noted that as the NDP steering group we only finalised in draft our Parish wide list of sites for potential designation as LGS's in January/February 2022, it was one of the later tasks we had to undertake. Once this list was finished via our secretary and others we then had to try and identify all landowners as best we could so we could write to them, prior to going out for Reg. 14 consultation to the general public.

The process we have followed in identifying potential LGS's within the Parish has been honest, diligent and as transparent as we could make it. We were trying to make designations that Parish residents would most value whilst meeting the stipulated NPPF criteria for designation.

We do not agree with the assertions made for the reasons presented in our responses to the points of the letter above. We believe that the proposed designation of Goonhavern Lakes and Lake Meadow (that includes Perran Springs and other surrounding land) is justifiable according to NPPF guidelines

and criteria. We believe its designation as an LGS would be welcomed by residents of Goonhavern and wider parishioners. This is supported by the general findings of our Parish wide survey in 2018, prior to the preparations of the NDP for Perranzabuloe, when 97% of respondents wanted us to protect the existing 'landscape and environment' for future generations.

Regarding the Addendum

The Land Registry title deeds give the identical address for the 3 owners mentioned.

The statement made in paragraph 2 of the Addendum (Mon 30 May 2022) is just misinformed, the land in question could not have been identified as an LGS in 2020, as we did not start identifying possible LGS sites until late 2021 when we fully understood what was meant by Local Green Space designation.

Consultee 41	Perran Springs Holiday Park. www.perransprings.co.uk info@perransprings.co.uk
Туре	Local business & also Local Landowner
Date	16/06/2022
Topic(s)	LGS
Comments	I sent the following email yesterday (16th June) to comments@perranplan.co.uk but have not yet received a reply confirming receipt.
	Please acknowledge safe receipt of this email (by return via email), together acknowledging the (12 page) pdf file attached below, which lists the reasons
	for our objection.
	We are raising an objection to the allocation of part of our holiday park, listed as a Local Green Space in the Draft Document (Reg 14 pre-submission) of
	the Perranzabuloe Neighbourhood Development Plan (NDP), for the reasons listed in the following attached large pdf file (9.1MB).
	Resp 14 - Perran Springs.pdf
SG Response	22/06/2022 Standard initial reply sent.
	02/08/2022 SG discussion.
	We have been transparent and consulted.
	The reasons for allocating these Local Green Spaces are we believe correct and in-line with majority community wishes.
	ACTION REQUIRED, change the description from "fishing lakes" to "lakes."
	See other response by SG re Perran Springs

Consultee 42	
Туре	MOTP 30
Date	16/06/2022
Topic(s)	Proposed new secondary school site
Comments	I am writing to give my comments in regard to the proposed Secondary School at the top of Liskey Hill in Perranporth. I understand the strategic importance of building a Secondary School to serve the North Coast communities. As a parent of a primary school aged child, I am concerned that secondary school provision in the local area is at breaking point. I am, however, writing to raise concerns of the potential landscape impacts of the proposal, caused by merging the villages of Perranporth and Bolingey by the construction of the new school. Over the 25 years that I have lived in the local area, the desire to maintain the distinct separate identities of the the two villages has been repeatedly raised whenever the local community has been consulted on both development and growth in the Parish of Perranzubaloe. The current proposal seems to suggest that the two communities will become linked by the school. I am therefore writing to raise the need to maintain some form of green space between the bottom of the school site and the village of Bolingey. If this is not done, then it will unfortunately set a precedence that will see development infilling all the fields between Perranporth and Bolingey. Maintaining the 'Bolingey Gap' as part of the development will serve to keep the two villages separate. In addition I would also ask that Chapel Hill is not used as an access to the school site and that measures are put in place to avoid it becoming a 'parking overspill for the school'. As a dark lane at the top of the hill, there is also a need to avoid the installation of street lighting, with its associated light pollution on the night sky. As one of the main accesses to Bolingey, it is an important part of the character of the village. Development of large scale infrastructure will always cause controversy within a local community. However, I am hoping that done correctly, by maintaining 'The Bolingey Gap', at least some of the landscape impacts of the new school will be significantly reduced.
SG Response	21/06/2022 Standard initial reply sent. 06/07/2022 SG discussion notes. This is part of a series of comments that support the school with what we see as sensible caveats that we are looking to address, where we can, with updates to the NDP.

Consultee 43	Dan Mitchell, MRTPI, Planning Director, 07802 283779, dan@influenceplanning.org, on behalf of Mr Xxxx, Mrs Xxxx and Mrs Xxxx. (MOTP 31)
Туре	Planning agent on behalf of Local Land Owner
Date	20/06/2022
Topic(s)	Ramoth Way
Comments	I am writing to you as Chairman of the Perran NDP Steering Group, the email address 'comments@perranplan.co.uk' is saying it is no longer valid so I
	have sent to yourself direct to ensure delivery.
	Please find attached a representation in relation to the Reg 14 NDP Consultation.
	If you require further information do not hesitate to contact me.
	Resp 15a - Ramoth Way.pdf
	Resp 15b - Ramoth Way.pdf
	Resp 15c - Ramoth Way.pdf
	Resp 15d - Ramoth Way.pdf
SG Response	2022-06-22, Hi Dan,
	Sorry the comments@perranplan.co.uk was a problem, we have had dozens of emails to that email account, so if you could send me a copy of the
	bounce "no longer valid" message that'd be great for me to delve into that.
	Thank you for the comments on the Perranzabuloe Neighbourhood Development Plan (NDP).
	We will consider all comments and requests for adjustments to the NDP at the end of Regulation 14.
	Regulation 14 ran from Friday the 22nd of April, for 8 weeks, ending on Friday the 17th of June 2022.
	We are now collating all of the comments to begin considering them all. We would like to reassure you that we have your comments on file and will consider them. The NDP preparation process requires the Steering Group to
	maintain and submit to the Examiner a compilation of comments submitted during consultation and the decisions we have taken in response. This
	compilation will be published on our www.perranplan.co.uk website and the Cornwall Council website.
	02/08/2022 SG discussion notes:
	General note: this submission ranges over a variety of topics, sometimes in a disorganised manner. We attempt in these responses to cover the main issues raised, and the points/paragraphs in brackets direct the reader to the first places where an issue is raised.
	1) The broad criticism in the overview (para 5-19) that the NDP is not allocating sufficient land and is out-of-date with the current housing crisis misses
	the point that provision of new housing in the parish over the plan period to April 2021 does not just meet the Parish's quota as part of the CLP housing
	target for the CNA by 2030 but had already exceeded it by 140%. (That is, double the quota and more.) This is clearly explained in the Background paper
	- Housing Completions. However, we acknowledge that the weight of this point would be made more apparent if the relevant data were to be included
	within the text of the NDP, and we propose to amend the draft plan accordingly.
	Response: Amend text of draft NDP (para 5.1) to include data on housing completions during plan period.
	2) Further, the CLP itself is criticised as out-dated (para 12), presumably as part of an attempt to call into question the entire basis employed in
	considering housing provision in this NDP. However the Cornwall Council 2021 document Securing Homes for All that is cited at length in this submission
	(at paras 13-16, although the extent of the quote is not presented very clearly) disagrees; it argues that "Cornwall is currently on track overall to meet

and exceed the delivery targets in its Local Plan 2020-2030" (p.18 of CC document). This reflects the conclusion of the five-year review undertaken by the Planning Department, accepted by Cabinet on 22nd September 2021, that the Plan remains up to date and continues to carry full weight in decision-making.

Response: No action.

3) In para 17, the respondent cites two points in support of the argument that the draft NDP contains housing policies more restrictive than those in the Cornwall Local Plan. (3.1) The NDP in Policy SD1 is indeed silent on the development of Previously Developed Land outside of and adjacent to a settlement boundary, but this silence simply leaves the CLP to provide the policy basis for decision making in this regard. The draft NDP does not 'rule out the development of PDL adjacent to a settlement' (para 27 of IP's submission). (3.2) The second point concerns 'the more rigid interpretation of 'rounding off' within the settlement boundary.' The phrase "rounding off" is not used within the draft NDP, let alone in policy SD1, and again CLP policies would apply here also.

Response: No action

4) The line of the SB in the Ramoth Way area. The arguments in paras 21, 24 and 28 are accepted: that development boundaries are used to define a boundary between the predominantly built-up area of an existing settlement and the surrounding, predominantly open countryside, and that the proposed boundary should not be more restrictive than the previous Carrick District 1998 boundaries.

It was decided that the SB should run along a line to the north-west of Ramoth Way, to include the sites of the dwellings built along the north side of Ramoth Way and the golf course, running close to the dwellings themselves for those parcels with large gardens. Additionally, to include sites for single dwellings that have gained planning permission by the end of 2022 immediately to the north of Ramoth Way, and to the south of its junction with Budnick Hill.

Response: SB amended

- (5) Conflict of interest. (para 29). Any member of the Steering Group that has a potential conflict of interest abstains from discussions and votes when they come up. This is the case for Ramoth Way discussions.
- (6) Objection to policy NE6, inclusion of the undeveloped area of land lying south west of Ramoth Way as a Settlement Gap/Green Buffer. Given the redrawing of the line of the SB in this locale (as previously), this makes such a designation redundant. In line with this change, the area is proposed to be designated as a Local Green Space. The points made to support the objection carry no weight in this regard.

 Response: No action.
- (7) Objection to PRP (36-38): The comment objects to the introduction of a parish-wide PRP across the entire parish, but also seems to be concerned about its application to Perranporth. It is far from clear that the evidence from St Ives does show that the policy there "has failed and has halted most new forms of new build". See, for example, [?Footnote reference to Rory's paper and Trapped: appendices). We have seen no reliable evidence and none is put forward to support the argument that the introduction of a PRP will significantly increase the pressure for the purchase of existing dwellings for SH/HLs, particularly in areas where the uptake of new builds for this purpose is low. There is widespread support for such a policy in the parish. The reliability of the case put forward by Influence Planning on the topic of Ramoth Way dwelling occupancy is questioned by the results of a survey of locals organised by the SG team; it shows that on the north side of Ramoth Way, seven of the ten properties which are complete are used for second homes and holiday lets, and not permanent residency. (For the most recent survey evidence, see Background Paper Principal Residence Policy.)
 Further research is planned to more firmly establish the incidence of SH/HLs in the parish.

Response: No action.

(8) Perranporth school site. The location of the site was not publicly confirmed until CC's press release at the beginning of June and this was too late to be included in the draft.

Consultee 44	Dan Mitchell, MRTPI, Planning Director, 07802 283779, dan@influenceplanning.org, on behalf of Classic Builders
Туре	Planning agent for local developer
Date	16/06/2022
Topic(s)	Welway
Comments	Please find another representation.
	Kind regards,
	Dan
	Resp 16a - Welway.pdf
	Resp 16b - Welway.pdf

SG Response

SG Discussion:

The Influence Planning submission covers much of the same ground as the other Influence Planning one and here we address the main additional points.

1) Inclusion of the site within the proposed SB:

It is correct that CC Guidance on Development Boundaries states that "where there are obvious sites which would fulfil the requirements of 'rounding off, infill or previously developed land', then these areas must be included within the development boundary." However, the CPOAN Infill/Rounding off (p.2) states that: 'Rounding off development should not visually extend development into the open countryside and should be predominantly enclosed by edging features.' Thus we do not believe this site fulfils the requirements of rounding off, given the concern that its development 'would visually extend building into the open countryside.'

This balance is echoed in the PRE-APPLICATION_ADVCE-4204016 (PA18/02473/PREAPP); it argues that this "site is capable of being considered as a potential "rounding off" site by virtue of it being enclosed on two sides by existing built development and on the remaining two boundaries by established Cornish hedgerows." However, it goes on to say that "the acceptability of development on the site is dependent on it being demonstrated through an LVIA that it would not visually extend building into the open countryside". And adds that to avoid doing so, it is likely that building heights should not exceed a single storey.

It is possible that the inclusion the site within the SB of the NDP would effectively characterise the site as within the built-up area of the village, and so remove the basis for influencing the visual impact of the proposed development in the manner suggested. Thus it seems reasonable to not extend the Development Boundary to include this site for these reasons, particularly given the strong local feelings about diminishing the settlement gap between Perranporth and Bolingey.

RESPONSE: NO ACTION REQUIRED

- (2) Settlement Gap cutting across the site. The objection is to the arbitrary nature of the line of Settlement Gap in Policy NE6 running across the proposed site. The logic behind the placing of the edges of the gap is as follows. Settlement Gaps are primarily based on visual assessment of the perception of a gap, and so it is reasonable to draw broadly straight lines across a landscape, into the distance to fixed boundaries (such as where the gap meets the extension of Liskey Hill and adjacent hedgerow). Minor deviations of that overall line can be reasonable to exclude small protrusions into that overall swathe of landscape (such as the line around the edge of the Parc Hendrawna development) without deviating too far from the intended line. The Settlement Gap edge at the Regulation 14 stage linked across to the obvious entrance to the static caravan park off Liskey Hill. When we changed the Settlement Gap to accommodate the proposed school, we only moved the line south of Bolingey Road. The site in question is north of Bolingey Road. If the adjustment to accommodate the school had not occurred the line would be as it is, hence our belief that it has merit. For further details on this please see the second set of full details PDF for the January to March 2023 mini consultation.
 - Reg 14 Supplementary Consultation Paper B Bolingey Gap + New School.pdf
 (https://www.perranplan.co.uk/wp-content/uploads/2023/01/Reg-14-Supplementary-Consultation-Paper-C-Ramoth-Way-SB-LGS-2.pdf)

RESPONSE: NO ACTION REQUIRED.

Consultee 45	
Туре	MOTP 32
Date	17/06/2022
Topic(s)	Proposed new secondary school site
Comments	I am writing to you with regard to the proposed secondary school to be built in the green field settlement gap of Bolingey. I think the location has been very poorly chosen, most agree we need a school but there appears to have been very little thought given to a sensible site. The settlement gap between Perranporth and Bolingey is of great importance to the people of both communities. Building a school in Bolingey will destroy that, and therefore impact the individual identities of Bolingey and Perranporth. Calling it Perranporth school when it is built in Bolingey will further erode Bolingey's identity as a separate settlement! The green fields of the settlement gap are also an important wildlife corridor. Even less thought seems to have been given to the impact on the local rural area as well as Perranporth. Traffic chaos will be inevitable, the few buses that serve Perranporth cannot stay within their own lanes on parts of St George's Hill and Budnic Hill, and most of Wheal Leisure - cars have to stop or pull off the road on to the pavement to let them through. The increase in coaches and buses will bring traffic to a standstill. The local rural lanes (mostly single car width) of Reen Manor, Reen, Reen Cross and Bolingey will inevitably be used as rat runs for school drop offs. The increased danger to the users of the lanes will be massive, many horses and riders, cyclists and walkers use these lanes. In many places even walkers have to step in to the hedges to let cars go through safely. Liskey Hill is already a traffic nightmare during drop off and pick up times, putting another school further up will compound the problem. Both of these issues need serious consideration, as well as the undemocratic way this has occurred.
SG Response	22/06/2022 Standard initial reply sent
	06/07/2022 SG discussion notes: A further series of comments that strongly raise the same concerns raised by others about the proposed secondary school. The SG are of the view that the needed school can be delivered with substantial mitigation of the concerns. We will updating the NDP to assist with this mitigation.

Consultee 46	Stephanie Irvine, Senior Planner on behalf of Park Leisure 2000 Ltd (who operate Oyster Bay), Lichfields, Helmont House, Churchill Way, Cardiff CF10 2HE,
_	T 029 2043 5880 / M 07471037035 / E stephanie.irvine@lichfields.uk / lichfields.uk
Туре	Planning consultant for local business / Local Landowner
Date	17/06/2022
Topic(s)	Oyster Bay
Comments	Reg 14 Draft Perranzabuloe NDP: Park Leisure representations
	Please find attached our representations on behalf of Park Leisure 2000 Ltd in response to the Reg 14 Draft Perranzabuloe Neighbourhood Development
	Plan consultation.
	We would be grateful if you would confirm safe receipt.
	Please note that we will also shortly be submitting representations on behalf of another client (Bourne Leisure Limited) by separate email.
	Resp 17 - Oyster Bay.pdf
SG Response	22/06/2022 Standard initial reply sent
	06/07/2022 SG discussion notes:
	Repetition?
	The policies in our NDP have been compiled with a consultant who has helped other groups get over a dozen NDPs to being adopted. Also and probably
	more important Cornwall Council has not objected to this version of the plan as having any repetition. Cornwall Council did pick up some repetition from
	an earlier draft. That repetition was removed. NO ACTION REQUIRED.
	Positive Approach?
	We have put in the positive circumstances where development will be encouraged.
	Most of the policies are positively framed. NO ACTION REQUIRED.
	Plans of Insufficient Quality
	We have done all we could to get high quality maps.
	The Cornwall Wildlife Trust map was the highest quality map we were able to obtain. This is not our map.
	We also suggest that, like others, Litchfields and their client can look at our www.PerranPlan.co.uk Website which at times has higher resolution maps.
	Their increased file size will not suit all. NO ACTION REQUIRED.
	Mitigation?
	Cornwall Council have not raised this as an issue.
	If Litchfields were able to identify any specific policies where this was a problem we would look at it, but Litchfield have not. This suggests that this may
	be a generic anti-NDP comment?
	Where the plan talks about adverse impact there is generally scope for mitigation. There are 18 policies where we allow mitigation and 4 where we do
	not. For example in NE1 we do not believe net zero impact is acceptable. For NE1 this is backed up by the LLCA work. NO ACTION REQUIRED.

Tourism Aims and Objectives

These policies are in-line with the evidence we have presented.

Cornwall Council historically made minor suggestions to this section in an earlier draft, which were included in the Regulation 14 version. NO ACTION REQUIRED.

Local Green Space

That a particular space is owned, private and subject to a planning condition meaning exclusive use is not grounds for land to not be Local Plan designated as a Local Green Space. The "Local Green Space Background Paper" was an early stages working document. We will update the background paper in light of comments made during the Regulation 14 consultations, to ensure that it is clearer.

Consultee 47	Stephanie Irvine, Senior Planner on behalf of Bourne Leisure Limited ("Bourne Leisure") who operate Perran Sands Holiday Park under the Haven brand.
	Lichfields, Helmont House, Churchill Way, Cardiff CF10 2HE, T 029 2043 5880 / M 07471037035 / E stephanie.irvine@lichfields.uk / lichfields.uk
Туре	Planning consultant for local business / Local Landowner
Date	17/06/2022
Topic(s)	Perran Sands Holiday Park under the Haven brand.
Comments	Reg 14 Draft Perranzabuloe NDP: Bourne Leisure representations
	Please find attached our representations on behalf of Bourne Leisure Limited in response to the Reg 14 Draft Perranzabuloe Neighbourhood Development
	Plan consultation.
	We would be grateful if you would confirm safe receipt.
	Please note that we have already submitted representations on behalf of another client (Park Leisure 2000 Ltd) by separate email.
	Resp 31 - Perran Sands.pdf

SG Response

SG 2023-05-04 discussion notes:

Repetition and conflict with the Cornwall Local Plan

The policies in our NDP have been compiled with a consultant who has helped other groups get over a dozen NDPs to being adopted. Also, and probably more importantly, Cornwall Council has not objected to this version of the plan as having any repetition. Cornwall Council did pick up some repetition from an earlier draft. That repetition was removed. Cornwall Council has also not identified any areas where our Plan and its policies are not in general conformity. We therefore do not accept the view that there are such issues, particularly as the response not identified which policies or parts of policies are considered not to be in general conformity with the strategic policies of the Local Plan.

NO ACTION REQUIRED.

Positive Approach

We consider that our policies are positively framed and we do not agree with the view that they are not. Cornwall Council has not identified any policies which are not positively framed and have not suggested, at any time, that the Plan and its policies will undermine deliverability of the Local Plan. In no way do they risk undermining the Local Plan strategy. You have not identified examples of where policies are not positively framed to demonstrate your objection. We consider that the relevance of your comments to our Plan and your understanding of neighbourhood plans can be called into question not only because of this, but also because of reference to a "Neighbourhood Development Forum". There is no such Forum in Perranzabuloe, with the Parish Council being the qualifying body. A Neighbourhood Forum (if this is what is being referred to) is typically the qualifying body for Neighbourhood Plans in areas where the Parish or Town Council is not the default qualifying body for Plan development or where a Parish or Town Council does not exist, for example in urban / metropolitan areas.

The NDP has been created to reflect the views of what the majority of the local community demonstrably want. If it achieves this, to whatever degree possible with an NDP, it will have delivered a positive outcome.

In relation to phrasing the NDP does include positive protection for many aspects, including but not limited to Biodiversity where this representation (see our response re NE5) looks to further the Cornwall Council position of going beyond national standards. Something we see as a positive approach for the natural environment.

In relation to the language we have used, we have put in the positive circumstances where development will be encouraged. NO ACTION REQUIRED.

Plans of Insufficient Quality

We have done all we could to get high quality maps.

The Cornwall Wildlife Trust map was the highest quality map we were able to obtain. This is not our map.

We also suggest that, like others, Lichfields and their client can look at our www.PerranPlan.co.uk Website which at times has higher resolution maps. Their increased file size will not suit all.

We also consider it of note that no other consultee has made a comment as to the quality of the maps. NO ACTION REQUIRED.

Mitigation

If Lichfields were able to identify any specific policies where this was a problem we would look at it, but Lichfields have not. This suggests that this may be a generic anti-NDP comment?

Where the Plan talks about adverse impact there is generally scope for mitigation.

All policies are fully evidenced.

Cornwall Council have not raised this as an issue.

NO ACTION REQUIRED.

NO ACTION REQUIRED.

Tourism Aims and Objectives

These policies are in-line with the evidence we have presented.

Cornwall Council historically suggested minor changes to this section in an earlier draft, which were included in the Regulation 14 version. We have been careful, throughout development of the Plan, to ensure that Cornwall Council's views are sought on alignment of both the objectives and policies with the Local Plan and its strategic policies. Cornwall Council has not identified any objection to the objective referred to in the representation made. We do not agree that proposed changes to the objective are necessary.

T01, T02, T03

The policies are supportive towards the tourist economy and are not restrictive towards sustainable development that protects natural assets, provide benefits both social and economic to the local community including all year-round employment.

The NDP looks to protect the natural environment, heritage and other aspects of the parish that are key reason many visit. The SG feels that Park Leisure and other businesses that rely on tourism to the parish should support protection of the natural and historic environment.

Cornwall Council have reviewed this draft NDP and not found these policies to be in conflict with the Cornwall Local Plan (CLP). We do not agree that proposed changes to the policy are necessary.

NO ACTION REQUIRED.

SD2, SD3 Sustainable Design of Development and the Quality and Distinctiveness of the Built Environment.

Policy SD2 is in line with the CLP and reflects the strong view of the residents.

Policy SD3 - Perran Sands is well located for footpath and public transport access and could easily fulfil the obligations of this clause. It is therefore supportive of the current use.

NO ACTION REQUIRED.

Natural Environment, Landscape and Coastal Management

Perran Sands is located on land designated by Cornwall Council as a County Wildlife Site. It is lies within Cornwall Council designated areas of Great Landscape Value; Outstanding Natural Beauty +/or Special Areas for Conservation. Given the overwhelming public opinion to protect our local landscape and environment these policies are entirely appropriate. Both analysis and the drafting of policies has been in conjunction with specialist consultants and in consultation with Cornwall Council.

NO ACTION REQUIRED.

NE1-Areas of Ecological Biodiversity and Geodiversity Value; NE2 Landscape Character and Landscapes of Local Significance; NE4 Protecting Trees Woodland and Hedgerows – see above

NO ACTION REQUIRED.

NE3- Embedding Green and Blue Infrastructure into New Development -

We are well aware that the parish includes a variety of distinct landscape characteristics as indeed outlined in our Landscape Character Assessment. The reference to Building with Nature and similar reference material is guidance.

NO ACTION REQUIRED.

NE5- Biodiversity Net Gain in New Development -

This reinforces the Cornwall Council Biodiversity SPD (SPD = Supplementary Planning Document) and which requires higher than general national standards.

Cornwall Council have not raised this as an issue.

NO ACTION REQUIRED.

NE6 – Settlement Gaps and Green Buffers. Gear Sands forms part of Cornwall Council's designated Penhale Sands Special Area for Conservation and hence the NDP objective of safeguarding this area particularly in respect of policy NE7.

The proposed polices are linked to the extensive LLCA work done.

We do not agree with the apparent assertion that buffers and greenbelt are the same thing. NO ACTION REQUIRED.

NE7- Important Views and Vistas –

There is strong local support to maintain to limit adverse visual impact from development. Gear Sands is part of a highly visible and attractive landscape. Supporting evidence is given in the appendix document called "Natural Environment and Landscape Evidence Base – Policy NE8 Important Views and Vistas"

The reasoning behind the list of views and vistas not being exhaustive is included in the justification text behind the policy. It says, on p.58 of the Reg 14 Plan, "The list is not definitive, it is likely that there are many more sensitive views that are valued locally, and that the character of these views changes seasonally. It is intended that the list forms a basis for a more detailed appraisal of the visual character and setting of any development site in order that proposals are designed in such a way as to protect through the avoidance of harm, enhance through the introduction or reinforcement of beneficial elements, and restore through the removal of obstructions or detracting features, the character, quality and amenity of Perranzabuloe's landscape.

ACTION rename this document to reflect that it relates to NE7 and not NE8

NE9 - Dark Skies, TT1- Transport Plan, EW1 Renewable Energy and Community Energy Projects

We note the support for these policies NO ACTION REQUIRED.

TT2 – Transport Assessment and Travel Plans. We aim from a local context to ensure adequate and safe traffic infrastructure for all users and in accordance with public opinion.

Cornwall Council have not raised this as an issue.

NO ACTION REQUIRED.

Consultee 48	
Туре	MOTP 33
Date	17/06/2022
Topic(s)	
Comments	Please find my attached comments on the Perranzabuloe Neighbourhood Plan:
	Policy H01 – I agree with the principal residence policy and it would be preferable for this to be secured by way of a S.106 planning obligation as it will
	run with the land and be registerable as a land charge and at the land registry to make it clear to all future occupiers that the restriction is in
	place.
	HO2 1(ii) – This should be amended to include the words 'provided evidence that they have' considered or words to that effect. This evidence can then
	be used when determining the planning application.
	HO2 2 – This should be amended to include the words 'meaningful' consultation
	H03 1(ii) – This should be amended to include words that mean they have to provide evidence if the minimum can't be provided.
	H03 (ii) – after on-plot should the words and/or be included before on-street
	Does NE11 need to refer to the requirement for appropriate infrastructure contributions towards Coastal Management in line with Local Plan requirements in order to preserve and mitigate any impacts.
	EW1 - Perhaps needs some narrative to explain why wind turbines will not be permitted in order to justify its inclusion in the plan unless this is elsewhere in the supportive text.
	School's capacity – thought should be given to a secondary school in Perranporth so children from the local community don't have to travel into Truro or
	other surrounding schools every day and there should be appropriate public transport for children in rural areas.
	Policy TT1 – The words "where relevant" are used should this be amended to say "the general expectation is that unless otherwise evidenced" this
	makes it more of a requirement I am not sure how the words 'where relevant' could be applied in planning determinations unless there are
	supporting documents that demonstrate the need.
	Policy TT2 – Should the policy perhaps require this to be secured in legal agreements too.
	Policy LW3 – This infrastructure should be required and secured in legal agreements can some narrative be included to that effect.

SG Response

22/06/2022 Standard initial reply sent

SG Discussion

HO1 - A legal agreement or planning permission condition is stronger than a S.106. This is also the standard way that Cornwall Council have accepted this in other NDPs. So we are going to leave this as presented as it gives the strongest mechanism.

NO ACTION REQUIRED

HO2 1(ii) - The policy does require the applicant to demonstrate how they comply with the criteria. Which we see as the same.

NO ACTION REQUIRED

HO2 2 - We understand the sentiment of this request, but don't feel it will add to the effectiveness of the policy.

NO ACTION REQUIRED

HO3 1(ii) - We agree that the policy would be strengthened by the removal of the word preferably and adding 'provides evidence as to why this can't be provided.' or similar wording.

NE11 - The Local Plan is already in place and being enforced by Cornwall Council. So we don't need to repeat this.

NO ACTION REQUIRED

EW1 - The current policy EW1 could indeed be clearer by specific reference to large scale wind turbines in criteria 1 and this revised policy will reflect current NPPF policy. Correspondingly it will be clearer if we modify EW1 1 to refer specifically to small scale renewable schemes. We will also add references in the supporting / justification text to the Government's policy on large scale wind proposals.

Schools capacity - This comment has been superseded by the announcement of a secondary school to be built on the edge of Perranporth.

NO ACTION REQUIRED

TT1 To strengthen the policy we are changing it at the end of the first paragraph of 1, from "where relevant, development proposals will be supported which:" to "where relevant, development proposals will be supported where they demonstrate that they:"

TT2 The issues referred to in the policy address the planning process and not implement, so we feel the suggestion isn't relevant.

NO ACTION REQUIRED.

LW3 - The surveys and other community engagement show that local community clearly want infrastructure to match development expansion, this policy reflects this aspiration.

NO ACTION REQUIRED.

Consultee 1	Colleen O'Sullivan / Senior Development Officer
	Cornwall Council / Planning and Housing, Colleen.OSullivan@cornwall.gov.uk
Туре	Statutory Consultee - CC
Date	21/06/2022
Topic(s)	
Comments	Apologies for the delay but I attach some comments on your revised NDP; these are mostly a repetition of comments made previously where these have not been taken into account (I've added an additional column to the original table). Thank you for taking on board much of our previous input. If you would like to discuss any of this, please give me a call or send me an email. The next step in the process will be formal submission to Cornwall Council – if you could give me an idea of when that is likely to be, that would be really helpful.
	Resp 18 - CC.pdf
SG Response	22/06/2022 Standard initial reply sent
	The SG discussed this 2022-03-29. Notes were made into the policy matrix sent over by Cornwall Council that can be found at the end of this document. • Appendix 1: Perranzabuloe Policy Matrix – Cornwall Council officer comments Feb 2022 & SG responses March 2022

Consultee 49	Andy Collins <andy.collins@cornwallwildlifetrust.org.uk></andy.collins@cornwallwildlifetrust.org.uk>
Туре	Local organisation (Cornwall Wildlife Trust)
Date	22/09/2022
Topic(s)	Local Green Space (LGS) designation
Comments	Dear William,
	Thank you for your letter (attached) regarding designating our Carn Moor reserve as 'Local Green Space'. We are more than happy for this designation to go ahead and I can also confirm that we have fairly recently taken ownership of the neighbouring land which would also be included in the LGS boundary. I have attached a map which shows our new land holdings. If you need any more information from us please do let me know. Yours sincerely, Andy Collins Mid Cornwall Reserves Manager
	Cornwall Wildlife Trust
SG Response	NO ACTION REQUIRED, thankyou for the support

Consultee 13	
Туре	Local business owner and Local Landowner
Date	17/11/2022
Topic(s)	LGS designation - LGS 23
Comments	As a landowner I am becoming increasingly concerned about my inclusion in the designation of green spaces within our parish. As explained in previous emails I was originally approached informally in our town shop about the proposal of the plan at which point I was given the impression by the local parish councillor that this was of choice to the landowner themselves if they wanted to be included. I immediately said that this was something that I did not want to be part of but was told that a letter will be in the post and all I had to do was to expand the committee that I didn't want my land to be included. Months passed and then I was once again approached to inform me that my land was still being included in the proposal as it seemed that effected people had misunderstood what it meant to them. The whole handling of this matter has caused a great deal of stress and confusion about the whole scenario and its seems to have been a very unprofessional affair from start to finish. Especially with the manner it was addressed to myself but from my understanding other landowners have had a similar experience with the NDP. The football pitch that we created on our land is currently used by Goonhavern Afc which we made an agreement with the club when I was a committee member that the area could be used for training and the occasional match until I require it for any other use. Since building our campsite we have continued to facilitate the use of the pitch for the club which enables the clubs pitch some well needed rest during the summer. When the NDP got involved I contacted the club chairman who agreed that this was not what we wanted and was not the best interest for the club as it could jeopardise our arrangement. He then contacted one of the committee members but was unable to get much sense as to how best to proceed or any advice. Points to raise objecting to the designation: 1. Football Pitch is not directly on any public footpath so the only access is through private land. The pitch is on the limits of the pa
	To conclude as much as I am currently happy to keep my simple agreement with Goonhavern afc over the use of my land when agreed I cannot accept the proposal from the NDP for the inclusion of my land in the local green space. I hope that I receive some positive feedback on the matter and carry on

	with my business. If someone could contact me shortly to confirm that this has been sorted or if you require any more information from me that would be much appreciated.
SG Response	Regulation 14 consultation period was the 22nd of April 2022 to the 17th of June 2022.
	SG decided to keep these comments on file to consider pre further stages of the NDP.
	Please see further later correspondence from this consultee and the consequent SG responses and notes.

Consultee 60	
Туре	Local Land Owner – Tregothnan Estate
Date	17/11/2022
Topic(s)	LGS 3, LGS 5, LGS 13, LGS 14 and LGS 15
Comments	The contact at Tregothnan Estate was contacted 13/09/2021 by email:
	"As discussed, attached is a list with plans showing the proposed Local Green spaces for the NDP. If these fall within private ownership, we should aim to notify the landowner, and obtain his consent to this.
	I believe that Area 1 -Bakery Way falls within Tregothnan's ownership, as does Hendrawna Park (Area13). If this is the case, please can you confirm that you are the Landowner, and would consent to this proposal."
	Same day reply:
	"It appears that numbers 3, 5, 13, 14 and 15 are in the Estate's ownership. The Estate will not approve these being designated as open green space and I do not believe that there is public access allowed at present so they cannot be designated in any event. This does not prevent sensible discussions about use of land and changes in the future. As you know we had a number of discussions and meetings about allotments and apart from our conversation I heard nothing from the Parish Council to confirm it would not proceed. I would be pleased to see the overall draft NDP if you can send me a link or share the plan."
	15/04/2022 email sent to Tregothnan:
	Many thanks for your reply. It appears that the ownership is shared with other land owners, who will also be informed. I apologise that you never received a formal letter regarding the Hendrawna Allotments. I will arrange for you to receive a letter after Easter. All our documents concerning the NDP are on our website in the Document section. The link is https://www.perranplan.co.uk. We are having our parish consultation through public exhibitions. These are as follows:- Goonhavern Community Centre (TR4 9NW)

Friday 22nd April 7:00 pm – 9:30 pm Saturday 23rd April 10:00 am – 12:30 pm

Perranporth Parish Council Offices (TR6 0DB) Monday 25th April 7:00 pm – 9:30 pm Tuesday 26th April 10:00 am – 12:30 pm

You would be very welcome to attend any of these meetings.

The formal consultation period starts on 22nd April, and finishes on 3rd June 2022.

12/09/2022 email from Tregothnan in response to the LGS letter being sent to them:

"Thank you for your letter regarding the Parish's intention to push ahead with designating Tregothnan owned land as Local Green Space in the Neighourhood Development Plan despite the Landowners objection.

Please note that where there is no public access it is not possible to register land as Local Green Space. As the proposed land has no access to the public it cannot therefore be designated and the Estate will object if there is another attempt to do so."

14/09/2022 email to Tregothnan in response to above email:

"Thank you for your email.

We will include this in the documents that are to be reviewed during the remaining process. This includes the Parish Council, Cornwall Council and the External Examiner. "

SG Response

SG discussion key points:

- Standard Local Green Space (LGS) letters have been sent to Tregothnan Estate that lay out that public access is not a requirement for LGS designation. No other reason for the removal of these proposed LGS designations has been presented by Tregothnan Estate.
- The proposed sites meet the criteria, with Tregothnan Estate neither challenging the criteria nor why any of their sites do not meet the criteria.

 NO ACTION REQUIRED

Regulation 14 Consultation - Public Exhibitions - Comments

Consultee 50	
Туре	MOTP 37 & Parish Councillor (PPC) who attended a few NDP SG meetings
Topic(s)	
Comments	SG Summary (please also see full comments received):
	Although the NDP document is long, it reflects the time & effort of those involved.
	Design Code P25 - Building referred to as Terrace Houses are in fact Flats.
	Design Code P15 - Many hyperlinks do not work for me.
	Strategic Master Plan - Too much subjective individual thoughts as opposed to policy.
	Resp 28 - MOTP.pdf
SG Response	SG review notes. The comments are focused on the advisory documents (in particular the Design Guide and Master Plan). We have already made changes regarding the terraced houses in the Design Guide. Thankyou. NO ACTION REQUIRED

Consultee 51	
Туре	MOTP 38
Topic(s)	
Comments	SG Summary (please also see full comments received):
	Too many documents
	Refers to items already completed
	Dogs on beach not addressed
	Village one way system only needed in summer- suggest omit
	NDP too large a scope
	Suggest more public meetings to reduce issues to a few
	Resp 29 - MOTP.pdf
SG Response	SG review notes. Dogs on the beach isn't a potential NDP issue. Agree that there is a summer need for a one way system, but can't see how this could be
	effective and seasonal. OR what would the harm be of it being year round. Yes there are a lot of documents with a lot being covered. This is in-line with
	other NDP's.
	NO ACTION REQUIRED.

Consultee 52	Anonymous hand written comments at the April 2022 public events / exhibition. From a person who lives on Cox Hill
Туре	MOTP 39
Topic(s)	
Comments	SG Summary (please also see full comments received):
	Agreed with policy HO1-PRP & policy NE4 Trees.
	Re policy BER6 Live/work said to include access for Emergency services
	Resp 30 - MOTP.pdf
SG Response	SG discussion concluded NO ACTION REQUIRED

Consultee 53	Bunny Bartel, Left hand written comments at the Perranporth public event. Former Parish Councillor
Туре	MOTP 40
Topic(s)	
Comments	All in the scanned form. Summarised as (please see full comments received):
	Aims & Objectives - Add charging points for electric cars, grey water & Reservoirs
	NE3-NE10 - Give more empathises to these
	LW2 - Include open air gymnasiums
	HE7 - Penhale camp - Sustainable conditions should be met before planning is approved & Penhale Camp should be used as a template for all
	development
	GENERAL:
	- Investigate renewable power source
	- Use local labour for construction
	- Water storage and recycle grey water
	- Provide carbon neutral parking areas
	- Make Perranzabuloe plastic free.
	• Resp 19 - MOTP 34.pdf
SG Response	SG review of the note concluded that there is no challenge to any of the plan, no requests to change anything. There are number of suggestions that are beyond the remit of the NDP, which we have therefore put to one side. It comes across as supporting the plan, for which we say thankyou. NO ACTION REQUIRED

Consultee 43	Dan Mitchell, MRTPI, Planning Director, 07802 283779, dan@influenceplanning.org, on behalf of Mr Xxxx, Mrs Xxxx and Mrs Xxxx. (MOTP 31)
Туре	Planning consultant for MOTP 31
Date	20/11/2022
Topic(s)	Local Green Space Designation - 'Ramoth Way, Perranporth, Cornwall'.
Comments	Dear Mr Rogers,
	Further to your letter dated 10th October 2022, please find a further representation/objection, this time in relation to the suggested LGS designation at
	Ramoth Way, Perranporth.
	I urge your group to re-consider ahead of moving the NDP forward as you set out in your letter.
	Kind regards,
	Dan
	Resp 24 - Ramoth Way.pdf
SG Response	The comments from Consultee 43 regarding Ramoth Way were in response to the letter below being sent out to this consultee.
	Also see later correspondence and SG comments re this consultee.
	SG Discussion of this:
	We thank to respondent for drawing our attention to their concerns about the proposed new designation of Ramoth Way as a Local Green Space. This
	letter was received in response to our contacting the respondent to inform them of the intention to designate the area of land as an LGS, in advance of
	this proposal being made public. This follows advice set out in the NPPG (National Planning Practice Guidance).
	The respondent's previous comments on the site (see above), proposed as Settlement Gap and Green Buffer were helpful in reviewing the
	appropriateness of that former proposed designation. The respondent requested a change to the settlement boundary, stating that it was not logical not
	to envelope dwellings on the northern side of Ramoth Way within the settlement boundary. We concurred with this view and have proposed to amend
	the boundary accordingly. As a result, the green space within Ramoth Way cannot be a Settlement Gap and Green Buffer as it is within the proposed revised boundary. It is therefore logical to consider the space as a Local Green Space.
	Moving on to consider the argument presented by the respondent that the area has previously been considered as LGS, the respondent refers to the LGS
	Background Paper presented with the Regulation 14 consultation. This paper was a discussion paper in which we considered which was the most
	appropriate designation for several spaces identified in the Local Landscape Character Assessment and from our own local knowledge of green spaces
	which have some merit in benefitting from protection against change. The area of land at Ramoth Way was originally determined to be most
	appropriately designated as a Gap and Buffer, based on the Local Landscape Character Assessment. The words "Not LGS" used in the table to which the
	respondent refers do not mean that the site was considered as a LGS and then discounted. The respondent suggests that the use of these words means
	that the site was tested against the NPPF criteria for LGS to qualify as such and did not meet them. This is not the case. We apologise if the wording used
	in the table in the Background Paper was misleading in any way. The area of land was considered to be most appropriately designated as Gap and Buffer
	at the time and no further assessment of the area as a LGS was undertaken. It was not until the respondent's previous comments were made, set out
	elsewhere in this table, that we were alerted to the need to reconsider this site as an LGS.
	In light of the above, and given that its designation as an LGS is a change from its proposed designation in the Regulation 14 Plan, we held another
	supplementary public consultation specifically to raise this with the local community and statutory consultees. This resulted in 91.49% of responses being

in favour of the question "Should the NDP extend the Perranporth Settlement Boundary to include existing properties to the east of Ramoth Way? (This change will also result in a change from a Green Buffer to a Local Green Space designation.)". The comments were also clear majority in favour of protecting this area from development. (See **Resp 20 - Survey Results.pdf**).

In the respondent's letter of response to us, the respondent has pointed out (para 7 of the response) that page 66 of the Regulation 14 Plan stated that "Those spaces which do not meet the LGS criteria have either been included within the policy relating to Landscapes of Local Significance, or Settlement Gaps and Green Buffers or are covered generally within policy relating to landscape character and green infrastructure." The assumption made by the respondent that Ramoth Way was tested first against the LGS criteria and then, as a result was designated as Gap and Buffer is not correct (as we have set out above). We can understand how the respondent got to this view, and we therefore thank the respondent for drawing our attention to this sentence in the Plan, which does not represent the logical process which was followed during the Plan's development. The two processes, or consideration of landscape character and of potential Local Green Spaces were not sequential, but were done concurrently as the Plan's evidence was produced. Ramoth Way was not previously been considered as a possible LGS, by virtue of the fact that it was felt it did not need both designations to protect its clear value locally. However, on the basis that it is no longer considered that Ramoth Way should be designated as Gap and Buffer, it is wholly appropriate to consider whether or not it meets the NPPF criteria as a LGS. Having considered this at length, we consider that it does meet the required tests. As a new LGS site in the Plan, we felt it necessary to hold an additional consultation on the proposal prior to submission of the Plan, given that it was not in the Regulation 14 Plan, and to determine, in addition to previous consultation responses on the importance of green spaces, whether the area in question is demonstrably special to the community.

In response to paragraph 22 of the respondent's letter, our letter to which this response relates was the advance notification of our interest in designating the site as LGS, we are consulting further to give opportunity to comment and also to help determine whether or not the site is demonstrably special to the local community. Its proposed designation is therefore following the correct procedure and the comments made were prematurely made to the completion of the due process being followed.

10 October 2022 letter

Regarding the Perranzabuloe Neighbourhood Development Plan (NDP), Local Green Space Designation: Land off Ramoth Way

We are writing to you since we understand you are an owner or part owner of the land shown on the attached plan. We are proposing to designate this land as a Local Green Space (LGS).

The background to this designation is as follows.

The NDP Steering Group (SG), and it's external advisors, has given detailed consideration of responses received from the Pre-submission (Regulation 14) Consultation on the proposed Perranzabuloe NDP. This included responses by Influence Planning on your behalf. The Steering Group (SG) conclusion was that the best way to address the issues raised was to move the proposed Settlement Boundary (SB) in the Ramoth Way area to include the dwellings along the north side of Ramoth Way.

As a consequence of moving the Settelment Boundary, it is now proposed that the area of land shown in the attached plan should be designated as a Local Green Space (LGS) and not a Settlement Gap/Green Buffer.

We believe that the support given during the recent consultation for designation of this parcel as a Settlement Gap/Green Buffer also indicates public support for this Local Green Space (LGS) designation. This aligns with historic surveys of majority parish views.

Below is some hopefully usefull information on LGS space designation.

The main implication of designation as a LGS is that future development proposals ('development' as used in the Town and Country Planning Acts) of the land would be much less likely to get planning approval.

Designation as a LGS:

- does <u>not</u> give additional public access rights other than on already existing public rights of way, such as footpaths, bridle ways and permissive paths.
- does <u>not</u> imply any additional responsibilities, costs, or liabilities to the landowner in terms of land management.

Some parties have confused the LGS designation with the term 'Open Space' or 'Public Open Space', both of which carry connotations of public access and use. This is understandable but unfortunate. LGS designation can apply to land with no public access (for information, look at the LGS designation part of Open space, sports and recreation facilities, public rights of way and local green space_on the GOV.UK website).

This supplements and expands information in the National Planning Policy Framework (NPPF), which states that to qualify as Local Green Space, land should be:

- a) in reasonably close proximity to the community it serves:
- b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife:
- c) local in character and is not an extensive tract of land.

In our NDP survey, sent to every household in the Parish during the early stages of conducting our NDP work, we gained considerable feedback from Parishioners on many subjects about their wishes for the future. A very high proportion of the respondents from the Parish (95% plus) wished to protect and enhance the beautiful environment and landscape that we are all privileged to enjoy.

As such, the NDP steering group has made considerable efforts to identify Local Green Spaces in and around the Parish that we believe are of special value and beauty to the parishioners. Where these areas identified are not protected by other formal designations (such as SSSI designation), we have sought to propose them as Local Green Spaces. Designation of special areas of beauty and amenity simply provides protection of these areas into the future and will be very welcomed by the vast majority of our parishioners.

We sincerely hope this letter regarding LGS designation does not raise significant concerns for you. However, if you wish to comment, please do so by the 21st of October 2022.

Any comments we receive will be passed on to the Parish Council, Cornwall Council and the Independent Examiner as per the standard NDP preparation process. You will have the opportunity to repeat any comments when Cornwall Council hold their statutory consultation, which we expect to be towards the end of the year. We understand that when Cornwall Council holds this consultation, notice will be sent to relevant parties, including yourself.

As above, any comments that you might make will also be given to the external examiner, who will make the final decision regarding any disputes.

Supplementary Consultation on Proposed Changes to the NDP (8 weeks from 19th Jan to 2nd Mar '23) – Responses & Comments

Notice of the supplementary consultation was sent to all those we had historically email contacted and any person or organisation that had emailed us during the Regulation 14 consultation.

It was also publicised on the 2 main local Facebook Groups, our own Facebook page, screenshots of this are on the www.perranplan.co.uk Website. On the first day our NDP Facebook page had 49 post reach and the "Please listen Perranzabuloe Parish Council" group had a 111 post reach.

Summary of S	Summary of Survey Monkey responses:	
	Please also look at the full survey results with all of the comments.	
	Resp 20 - Survey Results.pdf	
47	Number of responses	
80.00%	YES re Q1 Should the NDP shrink the Principal Residence Policy to just Perranporth? SG observation that most NO responses from those outside of Perranporth.	
91.30%	YES re Q2 Should the NDP change the Settlement Gap and Green Buffer between Perranporth and Bolingey to protect the distinct character of these 2 villages while supporting the proposal to build a secondary school on part of the area?	
91.49%	YES re Q3 Should the NDP extend the Perranporth Settlement Boundary to include existing properties to the east of Ramoth Way? (This change will also result in a change from a Green Buffer to a Local Green Space designation.)	
SG Response	We welcome the majority support for the suggested changes to the Plan consulted upon during the additional Regulation 14 consultation and consider this as approval from the community to make the changes proposed.	
	Q1 responses - We appreciate the overall supportive comments which reflect the point that the community has understood the consultation material and our reasoning why we have needed to revisit the PRP boundary, even if some comments have noted that they have reluctantly accepted the change. The 80% vote for "yes" suggests a large majority of support for the proposal and we will carry the proposed approach forward into the Plan to be submitted for Examination.	
	Q2 responses – We recognise that the proposal for the school and our suggested approach has resulted in several comments which express disappointment, but several comments also reflect that we have retained the gap and have pout in place policy criteria to manage and restrain	

development of the school site so as not to completely erode the gap originally proposed. We understand the concerns raised by some comments, but believe that the policy we have put in place will provide sufficient tests to ensure that a school development will both provide an asset to the local community and protect the integrity of the separation between the settlements. The 91% vote for "yes" suggests a large majority of support for the proposal and we will carry the proposed approach forward into the Plan to be submitted for Examination.

Q3 responses – We understand the concerns raised by some respondents that the proposed change to the settlement boundary could put the additional area within the extended boundary (at Ramoth Way) at risk from development, although we have sought to mitigate this risk by appropriately adjusting the designation of the area from buffer to a Local Green Space. We also recognise that several comments are supportive of our proposed changes. The 91% vote for "yes" suggests a large majority of support for the proposal and we will carry the proposed approach forward into the Plan to be submitted for Examination.

Consultee 1	Colleen OSullivan at Cornwall Council
Туре	Cornwall Council NDP Team
Date	27/09/2022
Topic(s)	Primary Residence Policy & additional consultation
Comments	Hi Roger and thanks for the message. I attach a statement about the status of the Cornwall Local Plan and some policy advice for you that Rob and I have
	pulled together based on the issues that we spoke about last week. Having thought about the principal residence policy, we think that actually the 2 part policy that I suggested won't work and we therefore recommend that you restrict the policy to Perranporth and any other areas of the parish where there is a clear justification for the policy only.
	I note your proposals for additional consultation below and confirm that we consider that this would meet any statutory obligations and achieve sufficient publicity for the changes to the plan.
	Please come back to me if there is anything else that we can help with at the moment.
	The Roger email to Colleen was: Colleen,
	A brief note to follow-up the wishes of the Steering Group expressed at our meeting on Wednesday last. I relayed the feedback from yourself and Rob Lacey regarding our current PRP. We hadn't received an input from you on a form of wording for the policy or text that would have made it more likely that an Examiner would at least retain such a policy for the Perranporth area, even if they were minded to not accept a Parish-wide version, and the general sense of our meeting was that we couldn't see how that could be done, without significantly undermining the case for the latter. (If you did come up with some form of words, we would be pleased to re-consider it!) After lengthy discussion, the six of us accepted the desirability of undertaking a 6-week consultation along the lines you suggested. A key factor here was Stuart Todd's observation that it would take at least a month to complete the revision of the Reg 14 draft and preparation of the accompanying
	documents, so in fact, going down that route would probably not hold us up for that full length of time. We are planning to also consult on the school site policy and a proposal to change the designation of one important area (off Ramoth Way) from a settlement gap/green buffer to a Local Green space (on the grounds, partially, that demonstration of public support for the latter might contribute justification to the designation). The hope is that we could start this within a couple of weeks.
	The SG wanted me to run past you our plans for the consultation. They are, I believe, in close accord with your proposals during our Teams meeting last Friday, but the view was that we would like to some 'written' confirmation that this scale of consultation will be regarded as 'legitimate'. We are proposing:
	*to produce an something like an A4-scale summary of the three points/issues (for use on Facebook and posters on Parish noticeboards, and to form the basis of the email to be sent out) with reference/links to more detail on the web site.
	*to email all the parishioners and others whose email addresses we have, plus statutory consultees. Of course, including all of those who have responded to our two consultations.
	*that William, our secretary and PC member, will present the material to Parish Councillors at a regular meeting and invite their responses. We are not proposing to mail out to all households nor to hold public meetings.

	For the standard 6 weeks. Before we start the actual consultation, the SG asked me to pass these ideas to you for your feedback, if that would be possible."
	Resp 32 - CC Policy advice for Perranzabuloe.pdf
SG Response	SG Response: This was the basis of undertaking the additional consultation and restricting the Primary Residence Policy to Perranporth.

Consultee 16	
Туре	MOTP 38
Date	22/02/2023
Topic(s)	Bolingey Settlement Gap & Additional housing
Comments	Thank you for your email advising of the proposed changes to the planning application.
	Unfortunately, my views remain the same as my original email. Even reduced, it will still have an impact of the local environment and wildlife.
	Why Bolingey needs a secondary school is beyond me. However, I assume that it is another way of Cornwall Council then being able to justify in their
	minds the development of the area.
	Any additional housing will not be for local people anyway, so I can not understand the need for another school in the area.
	Cornwall Council will unfortunately not stop until they have completely ruined Cornwall and concreted over it, despite what the residents who pay the
	Council Tax feel.
	See previous comment by this consultee
SG Response	The survey showed that over 91% are in favour of our proposal in terms of how the NDP adapts to the Cornwall Council decision on the proposed new
	school site. NO ACTION REQUIRED

Consultee 21	Jennifer Blunden
Туре	CEO of Truro and Penwith Academy Trust
Date	23/02/2023
Topic(s)	Proposed new secondary school site
Comments	That's great and we very much welcome this change to the settlement gap and green buffer. Many thanks for keeping me in the loop
SG Response	Noted (see SG response to later comments)

Consultee 21	Jennifer Blunden
Туре	CEO of Truro and Penwith Academy Trust
Date	28/02/2023
Topic(s)	Proposed new secondary school site
Comments	I hope that you are well. We are moving slowly forward Will update you as soon as I get anything concrete!
	Please find attached our response to the supplementary consultation.
	Resp 21 - TPAT.pdf
SG Response	We are pleased to see that the Trust is supportive, in principle, of the proposed changes to accommodate the proposed school. To respond to the concerns raised in the Trust's response, the delineated areas A and B are indicated in the proposed changes to the Plan as "indicative", but have been based on draft masterplans shared with us by the Trust / DfE. We consider that the policy criteria are fair and rightly provide tests for proposals which help to retain the integrity of the settlement gap, which is critical for the community. We have sought to provide balance to help enable the proposals for the school site to come forward, while recognising that potential impact across a range of factors must be satisfactorily mitigated, or avoided. Policy wording has been shared and commented on by Cornwall Council and we are content that they have no objection. The term "very special circumstances" should not be used exclusively in relation to Greenbelt, although the NPPF does use it when setting Greenbelt Policy. There is no Greenbelt in Perranzabuloe and the justification text at no point suggests that there is a relationship between Greenbelt policy and Policy LWE4. However, we recognise that the policy could be read, by a minority, to mean that the site has, somehow, Greenbelt status, which of course it does not. To avoid this concern and any further misinterpretation, we will delete this sentence.
	With regard to floodlighting, the siting of floodlights would be more appropriate on the southern part of Area A, away from permanent dwellings. The draft concept masterplan for the site, in the understood to be preferred option (option C), identifies a (assumed) full size football pitch on this area and we suggest that it would be more appropriate for an artificial or grass pitch with floodlights to be located in this southern part of Area A. We are advised by our consultant that there is likely to be less objection to both floodlights and noise in this location (despite proximity to the holiday camp) than in Area B where there are residential dwellings located in reasonably close proximity and less mature existing screening along the northern boundary of the site. We are also advised that if a floodlit artificial pitch is to be developed, from a security and accessibility point of view, particularly if community use is to be enabled on the site (a requirement of LWE4 and likely to be necessary if maintenance of an artificial pitch is to be financially viable in the long term), Area

A, closer to the school infrastructure and parking is a more appropriate location. Indeed, reconfiguring the site to enable easier access to an artificial or grass floodlit pitch within Area A so that it is closer to parking would immediately overcome any safeguarding issues or concerns if the pitch was to be available for community use after school day finishes while some students could still be on site.

We will update the map as suggested in the response.

We thank the Trust for responding and providing constructive comments.

Consultee 37	PLUMBLY, Anthony
Туре	Department of Education
Date	24/01/2023
Topic(s)	Proposed new secondary school site
Comments	Thank you Rory for bringing this to our attention – much appreciated. We will submit a response in due course. This was in response to RJ 20/02/2023 emailing Anthony Plumbly to say that "Question 2 relates directly to hopefully allowing the school to proceed and protecting the community desire for a Settlement Gap between Perranporth and Bolingey."
SG Response	NO ACTION REQUIRED

Consultee 37	PLUMBLY, Anthony <anthony.plumbly@education.gov.uk></anthony.plumbly@education.gov.uk>
Туре	Department of Education
Date	28/02/2023
Topic(s)	Proposed new secondary school site
Comments	Thank you again for the below.
	Please find attached further representation from the DfE relating to this supplementary round of consultation.
	If you would like to discuss, I can be contacted using the details below.
	Resp 22 - DofE.pdf
SG Response	Please see our response to the Trust (Resp 21 - TPAT.pdf) which deals with the issues raised in the DfE letter.
	We are not sure if the comments made about access are informed by an understanding of the local road network and lack of footpaths on rural single track lanes. Reference to an access point across Area B to Bolingey is intended to help secure safe access for students given the lack of pavements along Chapel Hill and Bolingey Road. We consider it to be unacceptable that a new school cannot take the opportunity to embed "safe routes to school" for students and we are sure that there will be ways to ensure that such an access is designed to ameliorate the concerns raised about a second access to help ensure students' safety can be addressed as a priority.

Consultee 1	Colleen O'Sullivan
Туре	Statutory Consultee - Cornwall Council
Date	02/03/2023
Topic(s)	Proposed new secondary school site
Comments	The DfE have provided us with a copy of their comments on the revised secondary school site policy (attached). This is just a short note to confirm that
	we support the comments that they make; in light of their comments about safe access to the school site, we would be happy to see the requirement for
	an additional access from Bolingey removed from the policy text.
SG Response	Please see our response to the DfE letter. We have also made minor amendments to the policy in line with what has been suggested by Cornwall Council
	officers, which we have appreciated.

Consultee 1	Colleen OSullivan
Туре	Statutory Consultee - Cornwall Council
Date	28/02/2023
Topic(s)	
Comments	Thankyou for sending us details of amended policies in the Draft Perranzabuloe NDP. Cornwall Council has no additional comments on the Principal Residence policy amendments and we support the changes that have been made. We have no additional comments on the proposal to designate land at Ramoth Way as Local Green Space. Please ensure that the landowner has been made aware of the proposal to designate the land. For the policy on the proposed secondary school site, a couple of minor comments: Suggest amendment to 1 vii) to read vii) to provide an access to the rear of the school to enable a safe and direct route for those accessing the school from Bolingey on foot (and by bike, if feasible) or by bike, while minimising the impact of lighting on the Settlement Gap and Green Buffer. [This is just recognising that the provision of a cycle route might be more difficult than a pedestrian-only route and might require more hard landscaping.] In para 2., rather than a legal agreement for community use, normally a planning condition requiring a Community Use Agreement is sufficient. In addition, at the end of the para, I think this should refer to school buildings rather than the site? — we'd suggest amendment to: 2. Proposals must make available, facilities for the community. Secure community use of indoor and outdoor sports facilities and pitches and multi-use spaces outside of school use hours will be ensured through a legal agreement planning condition that will require a Community Use Agreement. The layout of the site should ensure that there are no safeguarding concerns from public access to facilities and that facilities are accessible without the need
SG Response	to walk through the school buildings site. 1 ii) also requires that there is no sports lighting for the facilities in Area B – this could hinder the use of those facilities for the community as they would only be available during daylight hours. As an alternative, you could consider restricted hours for any lighting? We thank officers for useful and constructive suggestions to amend the policy wording. We have accepted the suggestions apart from the final one. We do not agree. Our consultant advises that if the site is designed appropriately, any floodlighting would be better placed on the southern part of Area A. New sports pitches with community access are typically designed so that they are easily accessible from car parking and towards the front of a site. This
	also helps to ensure security of the site, which, if a new full size 3G pitch is planned (we assume, subject to an understanding of community demand

within a suitable catchment) this will mean that investment will amount to around £1m (capital) to build the pitch. Siting a community access pitch in this
type of location also mean that any potential for safeguarding issues is minimised with members of the public using facilities not having to walk through
the school site. Please also see our response to Resp 21 and 22.

Consultee 47	Stephanie Irvine
Туре	Lawyers for Bourne Leisure Ltd (who operate Haven Perran Sands holiday park) AND Leisure 2000 Ltd (who operate Oyster Bay in Goonhavern)
Date	26/01/2023
Topic(s)	Update request
Comments	Thank you for your email letting us know about the supplementary consultation.
	Could you please let us know if the three proposed changes being consulted on are the only changes intended to be made to the Reg. 14 draft NDP prior to submission?
	It would also be helpful if you could let us know if there is any update on the intended date for submission?
SG Response	26/01/2023 email reply by RJ
	As is usual for NDP's there are other changes that come from feedback received from the Regulation 14 consultation process.
	Cornwall Council said that these three proposed changes were significant enough to warrant this extra "mini-consultation".
	There isn't an updated intended date for submission, but we hope it will be pretty soon after this mini-consultation.
	Same day email reply from Lichfields of "Thank you for your response below – much appreciated.
	We would be grateful if you could keep us informed on the progress of the emerging NDP."
	03/02/2023 email from Caitlin Newham <caitlin.newham@lichfields.uk>:</caitlin.newham@lichfields.uk>
	Thank you for your response below – much appreciated.
	We would be grateful if you could keep us informed on the progress of the emerging NDP.
	21/03/2023 email from Caitlin Newham <caitlin.newham@lichfields.uk> for an update:</caitlin.newham@lichfields.uk>
	"Further to the supplementary consultation on proposed changes to the NPD earlier this year, please could you confirm when the next consultation is due
	to take place?
	Do you know when it's likely to be issued to the Parish Council and then Cornwall Council?"
	21/03/2023 RJ reply that "we are going through the feedback and we will also need to do a check on everything.
	I suspect it'll be somewhere between 1 and 3 months time for it to be with the parish council.
	Then the time scale becomes down to them."

Consultee 19	Gaynor Gallacher at National Highways
Туре	Statutory Consultee
Date	02/02/2023
Topic(s)	Multiple
Comments	Thank you for providing National Highways with the opportunity to comment on proposed changes to the pre-submission version of the Perranzabuloe Neighbourhood Plan. As you are aware, National Highways is are responsible for operating, maintaining and improving the strategic road network (SRN) which in this case comprises the A30 trunk road which passes along the southern boundary of the Plan area, and which is currently the subject of a major improvement scheme between Carland and Chiverton Cross.
	We understand the changes have been driven by comments received from Cornwall Council and relate to the Principal Residence Policy, and Settlement Gaps/Boundaries and Green Buffers between Perranporth and Bolingey, and at Ramoth Way. We are satisfied that the proposed changes do not alter our previously submitted comments dated 4 May 2022.
	For ease of reference, those comments are repeated below and we have also made a change to the DfT policy reference, as this was updated in December 2022.
	In general terms we consider that the plans proposed policies are unlikely to result in a scale of development that would adversely impact on the safe and efficient operation of the A30. With regards to specific policies, Policy TT2 is noted with regards to the plan's requirements for development to assess traffic impact, as are references in Policies BER 2,3, 6 and 7.
	However, with regards to Policy BER8 and the Business Opportunity Areas indicated in Maps 22 and 23 located north of the A30, whilst these are identified as preferred sites rather than allocations, due to their proximity to the A30 development in these locations may have the potential to impact on the A30. We will therefore expect any development coming forward in these locations to be supported by an appropriate assessment of traffic impacts which should consider the operation of the SRN in line with national planning practice guidance and DfT Circular 02/2013. Where proposals would result in a severe congestion or unacceptable safety impact, mitigation will be required in line with current policy. We would also expect development in proximity to the A30 to give consideration to potential physical impacts on the SRN (eg drainage or screening), again in line with the requirements of DfT Circular 01/2022.
	These comments do not prejudice any future responses National Highways may make on site specific applications as they come forward through the planning process, which will be considered by us on their merits under the prevailing policy at the time.
SG Response	The SG considers this response sensible and appropriate. That their concerns would be dealt with by the normal planning application procedure, including appropriate impact studies.
	We would also expect any development coming forward in these locations to be supported by an appropriate assessment of traffic impacts which should consider the operation of the SRN in line with national planning practice guidance and DfT Circular 02/2013.

Consultee 28	
Туре	MOTP 22
Date	06/02/2023
Topic(s)	Perranporth to Bolingey Settlement Gap
Comments	I've been looking through the plans, which look good, but they have included some of my land, which I might in time want to build or put a shed/building on this land. I'm not sure why my land keeps getting adding onto the new proposed green settlement area. My address is Xxxxx bordering the proposed site. Just don't want my land included with these proposals.
SG Response	The policy doesn't preclude proposals for development being considered by Cornwall Council. We feel the logic is sound that the Settlement Gap goes up to the edge of the Development Boundary. A consistent approach has been used to determine the Development Boundary location. NO ACTION REQUIRED.

Consultee 55	Thompson, Alan
Туре	Statutory Consultee - Historic England
Date	13/02/2023
Topic(s)	
Comments	Thank you for your invitation to comment on the proposed changes to the Regulation 14 draft of the Perranzabuloe Neighbourhood Plan. We have reviewed the three documents that outline the specific changes to the Plan. I can confirm that these proposed changes have no impact on our previous response, or raise any new concerns for harm to heritage assets. Therefore, we have no further comments to make at this time. However, we look forward to being invited to comment again at the Regulation 16 consultation stage. In the meantime, we wish the Neighbourhood Planning Steering Group well with their ongoing work.
SG Response	Noted & thankyou. NO ACTION REQUIRED

Consultee 56	Charlotte Callaway <deputyclerk@stagnes-pc.gov.uk></deputyclerk@stagnes-pc.gov.uk>
Туре	Statutory Consultee - Adjoining parish council
Date	21/02/2023
Topic(s)	
Comments	Thank you for contacting St Agnes Parish Council and detailing the three changes to your draft plan. The consultation was put to the Parish Council's Planning Committee at their meeting last evening and they resolved to make no comment, but wanted to thank you for approaching them and wish you well going forward with the next stages.
SG Response	Noted & thankyou. NO ACTION REQUIRED

Consultee 43	Dan Mitchell <dan@influenceplanning.org></dan@influenceplanning.org>
Туре	Planning consultant for MOTP 31
Date	01/03/2023 (received date, date on document is 28 Feb 2023)
Topic(s)	Ramoth Way Green Buffer change to being a Local Green Space
Comments	Dear NDP Group,
	Please find attached additional comments in relation to the NDP Supplementary Consultation.
	a Dage 22 Dage ath May and
SC Besnense	Resp 23 - Ramoth Way.pdf 2023-04-27 SG Discussion notes:
SG Response	2023-04-27 SG Discussion notes:
	1 – Noted
	1 Noted
	2,3 & 4 - Context. No comments.
	5,6 & 7 - We apologise if the respondent has taken an assumption from the report that the site does not qualify as a LGS, but this assumption is not
	correct. The report applies, in the table's 2nd to 7th columns, the criteria set out in the NPPF which needs to be applied for spaces to qualify as LGS. For
	Ramoth Way, the site passes these tests. This is clear. The "commentary" column then introduces commentary, which, as the column heading states is
	intended to "inform appropriate policy consideration". That column was not designed to be definitive in a "yes" or "no" way with regard to the
	designation to be proposed. It is clear that the Ramoth Way area could have qualified at that point as a LGS. Again, it is clear that the notes in the table
	do not state that the area is not suitable as a LGS. In the case of Ramoth Way, the preference (and not the only potential designation which could apply), at the time, given other policies in the Regulation 14 Plan, was to consider it as green buffer, and that this proposed designation would reinforce the
	protection of the site which forms part of the Perranporth Dunes County Wildlife Site. The last column is clear, with its heading stating "Possible Policy"
	Designation". This, objectively, must be the case, as all policy proposals in the Regulation 14 Plan (by virtue of the purpose of the Plan being "draft" at
	that stage) are open for comment and consideration by all consultees, and can therefore be subject to change following consultation. The respondent's
	comments in objection to any designation of this site is testament to that inherent and necessary flexibility in policy formulation in the Plan –
	respondents have the right to make their views known and we have a duty to consider those responses. The additional consultation material has
	demonstrated clearly, we believe, that the site in question does qualify as a LGS.
	We do consider, however, that the text in the paragraph cited from p.66 of the Plan, when considered against the assessment report could be considered
	to imply that any sites not designated as LGS in the Plan do not qualify. As stated above, this is not the case with Ramoth Way – it does qualify. We
	propose to amend this paragraph in the revised Submission version of the Plan accordingly to ensure that it does not imply that this is the case.
	8 - As stated above, this is not the case. The assessment did not conclude that the Ramoth Way space does not qualify.
	o 75 stated above, this is not the ease. The assessment did not conclude that the Namoth way space does not qualify.
	9 – Yes, this is an important part of the LGS designation process, as noted in the NPPG. This is one of the reasons why we felt it necessary to hold the
	second supplementary Regulation 14 consultation, agreed as important by Cornwall Council, on the proposed change of Ramoth Way to LGS, made as a
	consequence of comments made by respondents to the initial Regulation 14 consultation. We could not approach landowners earlier in the process

where those sites were not initially proposed as LGS. However, the respondent's client was previously aware of the previous proposal for the site to become a green buffer. It is clear that the landowner and their agent (the respondent) were fully aware of the Plan and its policies, evidenced by the initial response received to the Regulation 14 Plan consultation. The intent of the NPPG to engage with landowners at an early stage is to avoid surprises. It cannot be claimed that the landowner or their agent have not been consulted on the Plan at an early stage. As we will state clearly in our Consultation Statement at Submission stage, we have done everything we could throughout the whole process to consult widely across the Parish and to any bodies which we were aware of which had an interest in the Plan and its content.

10 - The proposed change to the site's designation does not represent a "U-turn". This is simply not true. The change represents an evolution of policy relating to the site in question. The change has been brought about because of suggested useful and constructive comments made by another respondent in relation to the Settlement Boundary, now renamed "Development Boundary" in the Submission version of the Plan. The logical adjustment to the boundary in the Ramoth Way area necessitates reconsideration of the most appropriate designation to protect the value the community attaches to the Ramoth Way area. The principle of the need to protect the area remains, but the most appropriate designation to protect the area cannot be green buffer / settlement gap with the Development Boundary now amended to incorporate the Ramoth Way area.

As stated above, the additional consultation has given good opportunity for the landowner to consider the proposals.

We sought advice on the most appropriate approach to take and were reassured we were following the most appropriate process.

To allow a period of time to engage with the landowner or agent before undertaking the additional consultation (held for the minimum statutory period of 6 weeks) would not have resulted in any change to our proposal for a change of designation on the site and would have simply delayed the additional consultation, which we felt had to take place as soon as possible following the initial Regulation 14 consultation. While the respondent and landowner may have wished that delay to have been introduced, given their undoubted interest in developing the site, with the evidence clearly supporting our proposal, any dialogue with the landowner or agent would have been unlikely to have resulted in a change in our approach, and even if there was a case not to redesignate it, we would have felt duty bound to raise the proposal with the community, given that the Neighbourhood Plan is their Plan.

11,12, 13, 14, 15 & 16 - We consider that support, in principle, for the protection of the site, from the community does indeed justify pursuing the consideration of an alternative designation. Support by the community of the value of the space to the community is clearly one of the NPPF criteria, as referenced by the respondent.

The 19th January to 2nd March 2023 mini consultation on the issues around Ramoth Way that included the proposal to designate the space as an LGS received 91.49% support from the public.

In our survey of Perranzabuloe Parish in 2018 in preparation for our NDP over 97% of our recipients highly valued the landscape and environment of the area and wanted these aspects protected to be enjoyed and appreciated by future generations.

Responses from the recent additional consultation suggest there is support from those who responded to the consultation question "Should the NDP extend the Perranporth Settlement Boundary to include existing properties to the east of Ramoth Way? (This change will also result in a change from a Green Buffer to a Local Green Space designation.)". Of the 47 responses, almost 92% (43) answered "yes".

We strongly object to the accusation that the change of proposal from green buffer to LGS is a result of the views of "neighbouring residents and friends of the NDP Group" and that the proposal is "simply an opinion of the NDP Group". The respondent has no evidence on which to base this accusation. The Steering Group has been very clear and careful to adhere to terms of reference which require any member with a potential or a known conflict of interest to withdraw from decisions made on very local and site specific issues such as this. It is unacceptable, given the clear and objective evidence base that has been presented as part of the additional consultation, that the respondent's accusation can in any way be upheld as being valid.

17, 18, 19, 20, 21 & 22 - We have provided the evidence to justify the site's inclusion as a LGS in the Plan and need not repeat it here in response to these views. Additional comments in response follow.

The visual importance of the site to the character and setting of Perranporth was stressed in the Planning appeal decision to refuse planning in relation to residential development (OP21/0538/N, 1997: para 10). Namely, that this landscape to quote the Inspector was, "extremely important to the setting of Perranporth".

The County Wildlife Site (Red Shaded Area) shown in Appendix 2 of the Regulation 14 Supplementary Public Consultation covers the proposed Ramoth Way LGS, illustrating further the value of this site in the context of wildlife and habitat.

The area is also important for the many local walkers and includes an established permissive path through the site that links to the wider dune-scape. Land within an urban area, residential or otherwise, is very typical of an LGS designation.

It should be noted (and must be known by the respondent, a Chartered Town Planner) that a LGS proposal does not have to meet all of these criteria listed by the NPPF. Paragraph 102 b) goes further by citing these features and values as examples of how a LGS can be demonstrably special. It is simply not an exhaustive list.

In relation to the reference to the site being in private ownership, there is nothing in the NPPF or NPPG which states that a proposed LGS must be in public ownership and designation as a LGS does not give any right to public access on the site. The NPPG states that "other land could be considered for designation even if there is no public access" and "Designation does not in itself confer any rights of public access over what exists at present. Any additional access would be a matter for separate negotiation with landowners, whose legal rights must be respected." Paragraph: 017 Reference ID: 37-017-20140306 Revision date: 06 03 2014

With reference to public access, whilst there is no formally recognised public right of way on the site, the general public do informally use the space and there is no indication at the edge of or on the site either during the development of the Plan or at the time of writing this response (April 2023) which request the public not to access the site. Locals (not those on the Steering Group) testify that the fencing has for the last few decades been in a poor state or repair, with gaps and fallen down +/or missing sections of fencing being a key part of access to the path across the corner of the site that we are told has been used for at least 15 years.

The area is important for local walkers and includes an established permissive path through the site that links to the wider dune-scape.

The location of the path leaves the majority of the site undisturbed. This lack of disturbance is fundamental to the ecological value of the site, both in terms of species, but also the consequent visual character.

23, 24, 25 & 26 - The Steering Group has used the photographic technology available to it. It does not have and nor can it contract additional digital photography, probably at significant cost, to the advised specification suggested (which we note is only guidance). The photographs taken are simply made available to provide accurate context. They have not been manipulated or "photo shopped" in any way and we reject the suggestion that they are "misleading" – they simply are not. They are "stand in a spot and shoot" photographs. No alternative photographs to that specification suggested by the respondent have been provided by the respondent, which, if the views of the respondent are to be upheld, would be the obvious way in which the claims would be substantiated. Indeed, the respondent has marked up our photographs in their response, and so must surely be confident that they do represent the proposed area well and are an adequate basis on which to illustrate one of their arguments.

We would not expect that any photographs which follow the guidance suggested would show the area in question in such a substantially different way that would change our proposal. If anything, it is our view that any such photographs would likely enhance the visual perspective of quality and setting of the site in the landscape.

We would suggest, in the absence of any photographs provided by the respondent to the specification suggested, that the respondent's view that the photographs mislead the viewer can simply not be valid.

The photographs provided do in fact show the importance of the area in question to the visual perspective and landscape character of Perranporth from a number of locations within and around the village.

Extant permissions adjacent to the site are referenced by the responder. Extant permissions adjacent to a proposed site are not an issue that a LGS proposed site has to consider. Extant permissions on a proposed site are not a material consideration?? (ST please check) This comment simply has no relevance to the proposal when considering the NPPF criteria.

- 27 We respectfully disagree with the respondent's case and objections, as demonstrated in our responses above.
- 28 We respectfully take the view that we will not waiver in our position as a result of what we see as threats.

Consultee 44	Dan Mitchell <dan@influenceplanning.org></dan@influenceplanning.org>			
Туре	Planning Agent for a Developer			
Date	27/02/2023			
Topic(s)	Welway			
Comments	Please find attached representations submitted on behalf of 'Classic Builders SW Ltd.			
	 Resp 24a - Welway.pdf Resp 24b - Welway.pdf 			

SG Response

SG Discussion:

Re Section 1 - Shrink the Principal Residence Policy to just Perranporth

The objector makes three main points on the proposed PRP.

Objection to the arbitrary 1km circle. This was chosen as a straight-forward approach that covered the area of Perranporth where it is reasonable to believe that the vast majority of any new dwellings permitted are likely to be built within the plan period. Only a very small number are likely to be permitted in the southern part of Perrancombe. Around Bolingey, only a small number of houses has been approved in the last decade, and the SG team has not researched the incidence of Second Homes / Holiday Lets (SH/HLs) here, given the anticipation of limited (and hence unreliable) data. **NO ACTION REQUIRED.**

Exaggeration of the percentage of HL/SHs. The objection selectively pulls out a few points to support their case from the extensive survey. Even if we turn to the re-development of the two hotel sites cited, actually these serve to highlight the change in the 'housing' market during the last decade or so, with the emergence of a market for luxury flats specifically for the holiday market, to a degree not previously seen in Perranporth. For example, the redevelopment of what was previously a warehouse, or similar, into the high-density group of flats at Ocean Walk on Granny's Lane - that is primarily used for SHs/HLs – illustrates the pattern.

The argument is put forward that the Parc Hendrawna site is 'a more accurate reflection of typical holiday let/second home usage in Perranporth', with no evidence to support the contention. This site has a somewhat idiosyncratic history and unusually included 50% Affordable Housing. We would suggest that the recent housing development just up Liskey Hill (Seaview Crescent) is a better guide to likely future housing developments, and the evidence gathered there supports the case for a PRP. **NO ACTION REQUIRED.**

Failure to assess the implications of the loss of CIL revenues. The issue was referred to on p.40 of the Reg 14 draft, including footnote 54. And it was raised during public meetings to discuss the results of our main survey in October 2019 – see for example, https://www.perranplan.co.uk/category/meetings/ Public survey results/initial findings. **NO ACTION REQUIRED.**

Re Section 2 - "Change the Settlement Gap and Green Buffer between Perranporth and Bolingey given the new secondary school announcement". We have only moved the Green Buffer boundary, to take account of the new school proposals. The referenced planning application was submitted after the Regulation 14 Consultation period. SG discussion concluded no difference from our previous discussion on this issue when previously raised by Dan Mitchell (June 2022). As no new substantive arguments were presented, the same conclusion of **NO ACTION REQUIRED.**

Consultee 36	Jody Jeffrey <jody@redplanning.co.uk></jody@redplanning.co.uk>						
Туре	Planning consultant for the Perranporth Golf Club (local organisation)						
Date	01/03/2023						
Topic(s)	Golf Club						
Comments	Please find attached representation in response to the Proposed Changes Consultation.						
	Resp 25 - Golf Club.pdf						
SG Response	SG discussion. The proposed Development Boundary has been drawn in a manner consistent with how it has been determined elsewhere in the NDP. NO ACTION REQUIRED.						
	The June 2022 comments by Jody for the Golf Club were essentially the same, so the same SG conclusion of NO ACTION REQUIRED.						

Consultee 57	SM-NE-Consultations (NE) <consultations@naturalengland.org.uk></consultations@naturalengland.org.uk>			
Туре	Statutory Consultee			
Date	02/03/2023			
Topic(s)				
Comments	Please find Natural England's response in relation to the above mentioned consultation attached.			
	Resp 26 - Nat Eng.pdf			
SG Response	Noted & thankyou. NO ACTION REQUIRED			

Consultee 58	National Grid (Avison Young - UK) <nationalgrid.uk@avisonyoung.com></nationalgrid.uk@avisonyoung.com>
Туре	Statutory Consultee
Date	24/02/2023
Topic(s)	
Comments	We write to you with regards to the current consultations as detailed above in respect of our client, National Grid. Please find attached our letter of representation. Please do not hesitate to contact me via nationalgrid.uk@avisonyoung.com if you require any further information or clarification. • Resp 27 - Natnl Grid.pdf
SG Response	Noted & thankyou. NO ACTION REQUIRED

Consultee 25	
Туре	MOTP 21
Date	29/03/2023
Topic(s)	
Comments	Thank you for your email giving me details of the above. I'm afraid I have only just found it among a load of dross so much too late to comment further. I am most concerned about the land between Halt Road and the Garden Centre which used to be a market garden and do has very arable soil ideal for allotments. The owner had it all levelled by a huge bulldozer last year so will have killed off most of the wildlife, especially hedgehogs. Which I am told could be extinct in 20 years time. The Wildlife Trust seem to need a more aggressive approach to protect the whole Perranzabuloe area. At 89 I'm a bit old for leading a campaign but would fully support one. I'm certain Cornwall Council believe that the Government meant this area should have all the new houses, very few affordable. As for the A30 I can't find enough bad words that are suitable for an old lady to use. Thank you for reading this.
SG Response	This was received in response to the email notifying this MOTP about the supplementary consultation. NO ACTION REQUIRED

Consultee 57	
Туре	MOTP 29
Date	27/04/2023
Topic(s)	
Comments	Thank you for your update on our neighbourhood however, I strongly feel that we are constantly giving way to developers who make good profit out of their new houses and insufficient
	Priority is given to affordable housing. By "affordable housing" I mean specifically for local people, who work in the local area and do not earn "London" wages. Any criteria for Affordable Housing seems to be being over-ridden upon appeal. This makes it impossible for local people to compete with "incoming" families who do not support their local shops/pubs/restaurants/pet shops etc
	This must be rectified if Cornwall is to prosper in the future and not become just a "holiday" destination therefor dying in the winter months.
	More must be done to attract new local businesses, fibre broadband to rural areas, and encourage Entrepreneur's to our locality.
SG Response	NO ACTION REQUIRED

Consultee 58							
Туре	Local Landowner						
Date	01/06/2022						
Topic(s)	LGS 26						
Comments	FAO William Rogers						
	Thank you for contacting me via post and phone to discuss the plan to consider an area of my land for Local Green Space (Wheal Anna Heath 26) As discussed please can you remove it from the plan as we would prefer to keep this land for private use. There is a popular footpath running alongside the land and we have provided seating outside our property for walkers to enjoy the view over the pond. Please can you reply to confirm you have received this.						
SG Response	01 June 2022 email from WR to this landowner:						
	"Thank you for your email. We will remove your land (area 26) from the listing of Local Green Spaces for Perranzabuloe."						
	This was cc'd to other members of the NDP Steering Group, but not SG discussed at the time.						
	28-04-2023 letter sent out to this Local Landowners (and all other LGS Landowners) lead to this email from this Local Landowner: "I have received another letter dated 28th April 2023 to say that my land is up for reconsideration for green space. I have previously stated below that this does not interest me so again please take this land out of your option list. At this time no one has spoken to me regarding the plan so I've no idea on how this will benefit me. I have tried calling the mobile number of the letter (07507 278904) but it states that the number is not taking calls. I will await your response to confirm that you have removed my land from your list"						
	To which the following email reply was 05-05-2023 sent by RJ:						
	"Dear Mr Xxxxx,						
	At this stage, any decision to remove or not remove your land from the getting a Local Green Space (LGS) designation will be done by discussion and then majority vote of the NDP Steering Group.						
	As per the letter sent to you at the end of last week (scanned copy attached), if you do not wish your land to become a Local Green Space, then detailing reasons why your land does not satisfy the criteria and rationale is fundamental. Other than saying you do not want the designation, your email below						

does not do this.

A main theme of a Neighbourhood Development Plan (NDP) is what is demonstrably desired by the majority of the community. An NDP is not based on what is desired by any individual. The Steering Group feel that the proposed designation is in line with what the majority of the local community want. From our early community surveys, a very high proportion of the respondents from the Parish (95% plus) wished to protect and enhance the beautiful environment and landscape we are all privileged to enjoy. As such, the NDP steering group has made considerable efforts to identify Local Green Spaces in and around the Parish that we believe are of special value and beauty to the parishioners. Where these areas identified are not protected by other formal designations (such as SSSI designation), we have sought to propose them as Local Green Spaces. Designation of special areas of beauty and amenity simply provides protection of these areas into the future and will be very welcomed by the majority of our parishioners.

Designation as a LGS carries no implications on you as the landowner, other than for future development ('Development' as used in the Town and Country Planning Acts). Designation as a LGS simply means that future proposed development of the land would be much less likely to get planning approval. In particular we would like to stress that designation as a LGS:

- does not give additional public access rights other than on already existing public rights of way, such as footpaths, bridle ways and permissive paths.
- does not imply any additional responsibilities, costs, or liabilities to the landowner in terms of land management.
- LGS designation can apply to land with no public access (for information, look at the LGS designation part of Open space, sports and recreation facilities, public rights of way and local green space on the GOV.UK website at https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space#Local-Green-Space-designation).

I would encourage you to consider the criteria and revert as to why you do not feel your land should have LGS designation. Without this I suspect your land will not be removed from the list of proposed Local Green Spaces. This is because, to date, the Steering Group has not changed their view because an individual did not feel it interested them +/or how it would benefit them. The Steering Group have held steady with what they feel best matches the demonstrated wishes of the majority of our community."

"05-05-2023 email from this Landowner:

""The reason I wanted my land taken out for consideration is that I don't understand the implications around this. No one has offered to meet up or call me to discuss this. Your email suggests I should research this myself as all I see from the below is that it will protect the land from development. If ever I was to look at development then it would have to go through planning anyway so not sure what the difference is? It seems like a committee has been drafted together to get this underway yet the likes of myself who it mainly affects has not been involved in any talks so far. I personally keep all the footpaths clear and provide seating to view the area as we get many locals walking this route on a daily basis. It's one of the oldest mining areas in

Cornwall and I often speak to passers about its history and invite them to take a walk over the area. I don't feel comfortable with you now telling me that you wish to force a preservation on the land as that's exactly what I have been doing for the last 25 years. If you know the land in question then you will clearly see that it could never be built on and I have no interest in doing so. If you want to discuss this further then I would be happy for you to visit""

To which this 09-05-2023 email was sent to this Landowner:

""Thankyou for your reply.

The Steering Group are required to be even handed and keep a record of correspondence, conversations etc.

Which is why we are biased to written conversations.

It is also the case, that earlier in the process we had public meetings and public exhibitions (that were publicised and included detail and maps of the Local Green Space designations).

Having closed meetings +/or discussions with individual landowners as opposed to general, open to all public meetings +/or discussions may be against the key tenet of a Neighbourhood Development Plan, which is that it is based on what the majority of the community demonstrably want.

The LGS (and other designations) were determined via the NDP Steering Group committee who worked with employed experts and others (eg Cornwall Council, volunteers ...). So it has been a thorough process.

As I put in the email below, LGS designation would mean extra protection from development of the land in question.

It seems from your reply that this is in-line with your intention and 25 year history with the land, so there is no conflict.

If anything it means that assuming the designation is accepted by the appointed Examiner and that it moves forward to future iterations of the NDP (they are intended to be regularly reviewed) it means that your historic and apparent future desire to protect the land is more likely to continue into the future. Perhaps to a point beyond you and I being around to protect such valuable natural bits of our parish.

There is a sad history of land that was once thought of as being naturally protected being damaged or destroyed from development. Development can be housing, mining, drilling and other activities we might not today be able predict.

As previously stated, the designation does not give additional public access rights other than on already existing public rights of way, such as footpaths, bridle ways and permissive paths. It does not imply any additional responsibilities, costs, or liabilities to the landowner in terms of land management. It does mean that if anybody wished to develop the land (which it appears would anyway be against your historic and current wishes) this would be less likely to get planning / development permission.

If I'm right in that being your desire, then this designation helps with that."""

13-05-2023 email from this landowner:

Can I ask why it was that my land was up for discussion but I wasn't made aware of the scheduled meetings? Please can you let me know of the next meeting regarding this process. You state below that it will protect this land from future development and mining etc. In recent years I have had to prove my private right to mine this land as the Duchy of Cornwall tried to claim the mining rights unless I could prove ownership. I sent them the relevant paperwork which proved ownership and as this is part of only 2% of private mining rights in Cornwall I do not want to have this right taken away with your green space restrictions. The amount of houses being built around Goonhavern doesn't seem to be in Green Space interest so perhaps you should

put restrictions on all the land around the area that could actually be built on rather than my land in question. Also with this being such a beautiful area for locals to walk and appreciate could you look to make enforcements on the owner of the neighbouring field which in recent months has had a static caravan placed, storage containers, out buildings, power and water supplies and now pallets upon pallets of building materials placed rather than look to put restrictions on personal owners that go out of their way to make this a decent area for locals to appreciate

17-05-2023 email to this landowner:

Thanks for your most recent correspondence. Please find our response below:

In relation to why you weren't personally made aware of meetings where the inclusion of your land within the Local Green Spaces (LGS) designation was considered –

Firstly the process to look at land across the parish, including a parish wide Local Landscape Character Assessment, which was a key determinant of which sites were chosen for consideration as possible Local Green Spaces (LGS) took months of meetings by members of the Steering Group and consultants. Possibly over a year.

Secondly the Neighbourhood Development Plan (NDP) process does not require meetings with landowners to consider the potential inclusion of land as within LGSs. The remit of the Steering Group is to consider what best reflects the views of the parish majority.

The NDP process does requires us to notify land owners when land they own is a potential LGS. We did this. Some comments back have lead us to make changes to proposed Local Green Spaces. These have been where the land owner challenged the basis for their site being included as an LGS.

As previously stated, if you can say why you believe the criteria for designating your site as part of a LGS are not adequately met, then please do so in writing. That enables us to have a documentary record for the Examiner and others (the parish council and Cornwall council) to review.

An additional part of the NDP process has been that we have had multiple public meetings and public exhibitions. All meetings were publicised and the later exhibitions included detail and maps of the Local Green Space designations. This was all part of the Regulation 14 stage of the process and further details are on our Website at https://www.perranplan.co.uk/2022/04/23/publicity-initial-responses-re-regulation-14-has-begun/.

An NDP works at the point of planning applications, such that should a planning application come forward, for a site that has been designated as an LGS (which the Examiner, Cornwall Council, the public referendum all uphold, which they may not), it has more protection and is less likely to get development approved.

In relation to land around Goonhavern, the NDP is proposing a Development Boundary (also called a Settlement Boundary) around Goonhavern. This will mean that it will be more onerous to gain planning permission to develop the land beyond the Development Boundary around Goonhavern.

The NDP Steering Group is doing all it can to align with the wishes of 95% plus of the surveyed parishioners who, like you, wish to protect and enhance the beautiful environment and landscape we are all privileged to enjoy. We have set out to identify and protect general and specific sites that represent part of the valued local environment.

If there are no plans on your part to develop your site that is within the proposed LGS 26 designation, then we do not see a conflict.

SG Discussion

This consultee has neither challenged the criteria for Local Green Space designation, nor given reasons why their land does not meet these criteria. NO ACTION REQUIRED.

,,	Local Landowner 2022-07-13							
Date 2	2022-07-13							
Topic(s)	LGS 26							
Comments	ecently received a letter regarding the Local Green Spaces, please can you remove my land at Meadowside Farm.							
SG Response Sc	SG discussion that this consultee needed to be contacted as to their reasons for the land to be removed.							
Se	See the table of correspondence to LGS land owners. Letters were sent out in April/May of 2022 and a second letter in September/October of 2022.							
	2023-05-05 this consultee emailed the then chair of the Parish Council, Subject: "Fw: Local Green Spaces", but no email text or attachment. This was passed on to WR who emailed the consultee:							
0	Dear Xxxxx, On Friday you sent me a reply email, with no emails or attachments on it (see below). Please can you resend?							
2	2023-05-09 email sent to this consultee (note 2023, first correspondence was 2022, almost a year before):							
R	Re: Perranzabuloe Neighbourhood Development Plan (NDP) - Local Green Space Designation (LGS): Wheal Anna Heath							
	Thank you for your email regarding the NDP, on behalf of the Community's wish to allocate ground in the vicinity of Perranporth & Goonhavern. We note that you wish to object to this, and do not wish for this allocation to apply to your portion of land at Wheal Anna Heath.							
w 's th	As stated in our previous letter and as a matter of principle, we are requesting that written applications should be made, particularly if you, or an agent working for you, wishes to object. Any objections we receive will be passed on to the Examiner and to Cornwall Council when the draft NDP is submitted' to the Council as part of the NDP preparation process. You will have the opportunity to repeat any objections when Cornwall Council hold their statutory consultation around the end of the year, as the stipulated NDP approval process is followed. We understand that when Cornwall Council holds this consultation, the Council will ask us to notify relevant parties, and they would attempt to contact you then.							
A	Any comments that you might make at that stage will be also go to the external Examiner, who will make the final decision regarding any disputes.							
re	We would advise you to look at the GOV.UK web site where the policy of LGS designation is explained in detail in part of the "Open space, sports and recreation facilities, public rights of way and local green space" (https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space#Local-Green-Space-designation).							

If you wish to make any further comments to the Perranzabuloe NDP Steering Group, then please do so.

2023-05-22 email from this consultee:

I am writing to object to the Local Green Space tie that the Neighbourhood Development Steering Group are putting on my Garden/Yard/field.

I'm really disappointed to be in this situation with just weeks of notice that this is going ahead and that my email sent one 13th of July 2022 has been ignored. I presumed that my land had been withdrawn following the email as I received no further communication.

The reasons I'm objecting are:

The field has already been developed and is currently used as garden, yard and storage, surely, it's better to have a Local Green Space that's not already developed?

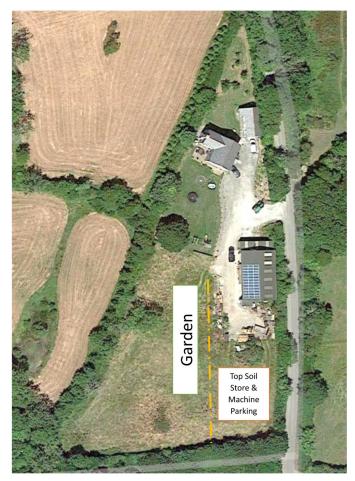
Both myself and my wife use buildings on the site for our businesses and both are up to capacity and we need to expand and would have already done so had it not been for the pandemic. If our land has this tie will our businesses be able to expand?

Will we still be able to put raised beds, plant trees and expand children's play equipment?

The tie will de-value our property.

I also believe this could have been handled better, especially on land that has already been developed. My email had been ignored and don't feel a few weeks is acceptable notice.

We are currently waiting for the NFU to come and have a meeting with us to discuss how they are going to support our case.



2023-05-23 – email to this consultee from WR (cc then chair or the Parish Council)

Thank you for your email. We have noted your comments, all of which will be forwarded to Cornwall Council who will make a ruling as to whether or not to grant Local Green Space status to this land. Following this a final determination will be subject to a decision made by the Independent Examiner, which will be binding.

SG Discussion

This consultee has neither challenged the criteria for Local Green Space designation, nor given reasons why their land does not meet these criteria.

The LGS does extend well beyond the area in the annotated "satellite image" provided by this consultee (see overlay image below)

A cadastral map of the area suggests that this consultee may own the plot with their property and field to the south, but not the rest of the surrounding undeveloped land that together is in the proposed LGS. See image of cadastral plots below where the property with what looks like solar panels in the image supplied by the consultee is circled.

LGS designation will not mean this consultee cannot continue to use the land as they have and as (per their email) they plan to do so with "raised beds, plant trees and expand children's play equipment". If the LGS designation is upheld by Cornwall Council and the Independent Examiner, the designation will protect this land from planning application required development.

NO ACTION REQUIRED.



Consultee 61	
Туре	Agent for Local Landowner
	James Evans <james@evansplanning.co.uk></james@evansplanning.co.uk>
Date	02/06/2023
Topic(s)	LGS 4

Comments	Hi,
	Please see attached.
	James Evans BA (Hons) Assoc RTPI
	evansplanning.co.uk
	Resp 34 - Bolingey Lakes.pdf
SG Response	This late response from this landowner, was considered by the SG in mid June 2023.
	Letters were sent in April and September of 2022. These were sent to "O'Gorman, The Bolingey Lakes, Bolingey, Perranporth".
	The SG therefore feel they acted in good faith to contact this land owner.
	In relation to the other points raised:
	The land is demonstrably special in that lakes are well know to the local Bolingey community.
	Within living history locals could access the lake for fishing via a locals permit system.
	In more recent years, fishing access is for White Acres customers only.
	The history of the lakes has a value to the local community.
	The lakes are visible, depending on the time of year and consequent vegetation.
	The lakes are unique to the area, with consequent unique wildlife including nesting ducks and geese.
	Developing the site will be detrimental to the local aesthetic and ecological value of the site.
	NO ACTION REQUIRED.

Statutory Consultees – List with responses

Neighbourhood Planning Regulations Reference	Organisation	E-mail	Telephone	Emailed	Response Notes	Mini Consultat ion Email sent
Statutory Consult	ees					
(A) (A)	Neighbourhood Planning, Cornwall Council Adjoining Parishes surrounding your parish boundary	neighbourhoodplanning @cornwall.gov.uk	0300 1234 151	29/04/22 see below	Auto responder	19/01/23
	St Agnes PC	deputyclerk@stagnes- pc.gov.uk		29/04/22		19/01/23
	Crantock PC	clerk@crantock- pc.org.uk		29/04/22	11/05/22 reply from Crantock Parish Council clerk that "Thank you for informing Crantock Parish Council that the Perranzabuloe Neighbourhood Development Plan is now at Regulation 14 Stage. Crantock Parish Council would like to congratulate the Steering Group on a comprehensive document and wish you well for the referendum"	19/01/23
	Cubert PC	cubertpc@btinternet.co		29/04/22		19/01/23

Newlyn East PC	clerk@stnewlyneast-	29/04/22	10/05/22 reply from St	19/01/23
,	pc.org.uk		Newlyn East Parish	, ,
			Council clerk "Thank you	
			for sending us the	
			details of the	
			Perranzabuloe	
			Neighbourhood Plan. I	
			have circulated this to	
			my Parish Councillors.	
			The Parish Council	
			would like to	
			congratulate the	
			Steering Group on	
			producing such a	
			comprehensive plan and	
			wish you well with the	
			referendum."	
St Allen	clerk@stallenparishcou	29/04/22	17/05/22 reply from St.	19/01/23
	ncil.gov.uk		Allen Parish Council clerk	
			that " Thank you for	
			informing St. Allen	
			Parish Council that the	
			Perranzabuloe	
			Neighbourhood Plan is	
			at the Regulation 14	
			stage.	
			We wish you well with	
			the referendum."	
Kenwyn	clerk@kenwynparishco	29/04/22		19/01/23
	uncil.gov.uk			
Chasewater	Parish.Clerk@Chacewat	29/04/22		19/01/23
	<u>er.Org</u>			

(B)	The Coal Authority Planning Team	planningconsultations@	01623 637 281	29/04/22	Bounce, so emailed	19/01/23
		coal.gov.uk			thecoalauthority@coal.g	-,-,-
					ov.uk (on their Website).	
					That got an auto	
					response.	
					Then 13/05/22 the reply	
					"Yes, you have the right	
					email	
					planningconsultations@	
					coal.gov.uk . We will	
					take your email as you	
					formal consultation and	
					will provide you with a	
					response by the	
					identified deadline."	
(C)	Homes England (originally Home	enquiries@homesengla	0300 1234 500	29/04/22	Auto responder	19/01/23
	and Communities Agency)	<u>nd.gov.uk</u>				
(C)	Regulator of Social Housing	enquiries@rsh.gov.uk	0300 124 5225	29/04/22	Auto responder	19/01/23
(D)	Natural England	consultations@naturale	0300 060 3900	29/04/22	Auto responder	19/01/23
		ngland.org.uk				
(D)	Natural England	stephanie.parker-	0300 060 3900	29/04/22		19/01/23
		stephenson@naturalen				
		gland.org.uk				
(F)	Historic England (originally English	<u>e-</u>	0117 9751308	29/04/22		19/01/23
	Heritage)	swest@HistoricEngland.				
		<u>org.uk</u>				
(G)	Network Rail	townplanningwestern@	07732644491	29/04/22	Auto responder	19/01/23
		networkrail.co.uk				
(H)	National Highways (originally	Gaynor.Gallacher@high		29/04/22	Auto responder & later	19/01/23
	Highways Agency)	waysengland.co.uk			04/05/22 reply re bits	
					they do object to.	
(H)	National Highways (originally	planningsw@highwayse		29/04/22		19/01/23
	Highways Agency)	ngland.co.uk				
(1)	Marine Management Organisation	marine.consents@mari	01752 228 001	29/04/22		19/01/23
		nemanagement.org.uk		,, ==		-,,
(J)	Three (Mobile)	jane.evans@three.co.uk		29/04/22		19/01/23

	O2 and Vodafone (Mobile)	EMF.Enquiries@ctil.co.u		29/04/22		19/01/23
		<u>k</u>				
	EE Mobile	public.affairs@ee.co.uk				19/01/23
	OFCOM	Spectrum.Licensing@of		29/04/22	Auto responder	19/01/23
		com.org.uk				
(K) (i)	Royal Cornwall Hospital Trust	garth.davies@rhct.corn wall.nhs.uk	01872 252477	29/04/22	Bounced so emailed the updated, apparently current head of RHCT communications. Laura Mason	19/01/23
	Kernow Clinical Commissioning	primarycare.kernow@n	01726 627798	29/04/22		19/01/23
	Group	<u>hs.net</u>				
(K) (ii)	National Grid (National Grid has	nationalgrid.uk@avison		29/04/22		19/01/23
	appointed Avison Young to review	<u>young.com</u>				
	and respond to development plan					
	consultations on its behalf.)					
(K) (ii)	Western Power Distribution	wpdnewsupplies@west ernpower.co.uk	08456012989, South West enquiry line. (If you contact them by phone you will need to ask for the consultation request to be logged and a planning officer will be assigned.	29/04/22	"Please can you confirm if you require any assistance from WPD in regards to the development plan. Please note WPD do not have internet access so will not be able to open the link sent." to which replied "You have been given to us as one of the Statutory Consultees for Neighbourhood Plans (also sometimes called Local Plans or Neighbourhood Development Plans ie NDP's). We don't need your	19/01/23

					assistance, but wanted you to have this formal notice of the progress so that you can have a look and comment if needed."	
(K) (ii)	EDF Energy	newconnections@edfen ergy.com		29/04/22		19/01/23
(K) (iii)	Wales and West Utilities Limited	enquiries@wwutilities.c	0870 165 0597	29/04/22	Auto responder	19/01/23
(K) (iv)	South West Water	developerservicesplanni ng@southwestwater.co. uk	01392 443702	29/04/22		19/01/23
(L)	Community and Voluntary Bodies whose activities benefit all or part of the neighbourhood area	From the parish Website, we've emailed or Website form	See list below - ie below the line with (P)			
(M)	Bodies which represent the interests of different racial, ethnic or national groups in the neighbourhood area	contacted, the list below and assume the mailshot to all households, notice boards etc. will have got				

(N)	Bodies which represents the interests of different religious groups in the neighbourhood area	the attention of at lease somebody in most if not all local groups.			
(O)	Bodies which represent the interests of persons carrying out business in the neighbourhood area				
(P)	Bodies which represent the interests of disabled persons in the neighbourhood area				
		Surf Life Saving Club - nigel.bowden@perranp orthslsc.org.uk	29/04/22		19/01/23
		www.perranporth.play- cricket.com	29/04/22		19/01/23
		https://www.perranport hafc.co.uk/ which lead to samharper21@hotmail. co.uk	29/04/22		19/01/23
		https://www.perranport hgolfclub.co.uk/	29/04/22		19/01/23
		Website for rugby club gave perranporthrfc@outloo k.com	29/04/22		19/01/23
		info@limehouseyoga.co m	29/04/22	Thankyou, will readreply	19/01/23
		Garden Charities Trust - gardenscharities@yaho o.co.uk	29/04/22		19/01/23

Comments Appendix 1: Perranzabuloe Policy Matrix – Cornwall Council officer comments Feb 2022 & SG responses March 2022

	Policy	Policy title	Comments	NDP SG mtg 29 03'22
1	SD1	Settlement	Fine	Leave as is
		Boundaries		
2	SD2	Sustainable Design	This is a catch-all policy; I think the best advice might be to break this policy up and to	Leave as is
		of Development	have one overall ambition for general / sustainable development and to incorporate	
		and the Quality	specific requirements eg recycling / waste bins / parking into existing design policies	
		and	elsewhere in the plan separate areas.	
		Distinctiveness of	Update references to the newly adopted Cornwall Design Guide: Cornwall Design Guide	
		the Built	- Cornwall Council NB The Cornwall Design Guide will be updated from time to time as	
		Environment	necessary so it is best to refer to the latest Cornwall Design Guide on this webpage	
			rather than its date.	
3	SD3	Reducing the	Fine	Leave as is
		Need to Travel by		
		Car (Major		
		Development		
4	SD4	Managing Flood	Seeking additional input – comments to be provided asap.	Leave as is
		Risk from Surface		
		Water Run-off		
5	HO1	Principal Residence	For consistency, we'd advise that the policy text mirrors that which has been	The SG agreed to adopt RK's adapted
		Policy	successfully used in recent NDPS (below). In addition, you will need robust evidence to	comments.
			support the need for a principal residence policy, demonstrating that the level of	
			second homes is having a detrimental impact on community sustainability, for example,	
			whether local facilities can operate year-round, or whether the local school is thriving.	
			Your policy justification gives a figure of 14% of second homes across the parish. This	
			may not be enough to justify a second homes policy at examination (in St Agnes, the	
			policy was restricted to part of the parish only). You should try and strengthen your	
			evidence base if you wish to retain this policy, using more up to date information and	
			trying to demonstrate the impact on your local communities. You may also want to	
			consider restricting the policy to the parts of the parish that are most impacted by	
			second or holiday homes.	

	Policy	Policy title	Comments	NDP SG mtg 29 03'22
			Suggested policy text Open market housing, excluding replacement dwellings, will only be supported where there is a restriction to ensure its occupancy as a Principal Residence. Sufficient guarantee must be provided of such occupancy restriction through the imposition of a planning condition or legal agreement. New unrestricted second homes will not be supported at any time. Principal Residences are defined as those occupied as the residents' sole or main residence, where the residents spend the majority of their time when not working away from home. The condition or obligation on new open market homes will require that they are occupied only as the primary (principal) residence of those persons entitled to occupy them. Occupiers of homes with a Principal Residence condition will be required to keep proof that they are meeting the obligation or condition and be obliged to provide this proof if/when Cornwall Council requests this information. Proof of Principal Residence is via verifiable evidence which could include, for example (but not limited to) residents being registered on the local electoral register and being registered for and attending local services (such as healthcare, schools etc.).	
6	HO2	Design of Dwellings	NB the new Cornwall Design Guide: Cornwall Design Guide - Cornwall Council was adopted in December 2021 which is worth taking a look at. It will be updated from time to time as necessary so if referred to it is best to refer simply to the Cornwall Design Guide on this webpage rather than its date. The preference for on-plot parking over on-street parking in the policy and in Design Principles for Character Areas CA3d/CA3e/CA4 in the Design Code does not align with the emerging Policy in the Climate Emergency DPD Policy T2 and Cornwall Design Guide p46-47. Consider a more flexible allowing for well-integrated on-street parking in those locations where it would be feasible. The Cornwall Council approach seeks to reduce land take (e.g. for the benefit of garden space) and visual impact as well as not encouraging car use. Appendix 3 / Design Code: Page 15 – the new Cornwall Design Guide is published so references should be updated (3.1)	Leave for now, but consider at the end of Regulation 14 consultation with any other related feedback. Will at that stage need to refer to AECOM.

	Policy	Policy title	Comments	NDP SG mtg 29 03'22
			 where possible it may be useful for the character area descriptions to be clearer on which features (especially of more modern development) are considered positive contributions and which detract. page 51 – potential to recognise drainage benefits of green infrastructure (drainage being mentioned at p44, 4.2). page 55 CA3b would be helpful to explain what a "focal gateway" means. page 65 "other orientation reasons" – it may be helpful to include effective use of solar PV as an example, as included as a preference in the Climate Emergency DPD Policy SEC1. page 65 points h and k – it may be helpful to mention that Cornish hedges can contribute to biodiversity network as well as character: Cornish hedge biodiversity - Cornwall Council. page 68 – NB advice on lighting for NDPs is available at Dark Night Sky Guidance. Design code 05: As well as bringing attention to white render staining tendencies, specification could also look at sympathetically identifying local render typologies (eg. soft edge, rough finish) 	
7	НО3	Parking Design in Housing Developments	ii) preferably provides a minimum of two on-plot parking spaces per unit side by side where feasible, not in line, to discourage on-street parking;	Refer to AECOM at the end of Regulation 14 feedback make sure design guide fits with H03 criteria 2.
8	НО4	Community Homes	Fine	Leave as is. (Yes it might be seen as Cornwall Local Plan (CLP) repetition, but the Steering Group felt some of the community would want to see it.)
9	HO5	Housing for Specific Needs	This policy seems to include local residence criteria for accessible homes. If these are not affordable homes, you cannot restrict who they can be sold to.	 (1) CC point is correct, so yes take on their feedback. (ie delete the last 5 words of clause 2). (2) SG agreed to take on RK's suggested text amend to make it stronger. (3) Leave as is for now, but RK is going to look into this with ST. ST to make the final call as he's the expert.

Policy	Policy title	Comments	NDP SG mtg 29 03'22
			(4) CC don't have to meet it, so it is weak
			(RK comment). So leave it as is.
			SG notes to Stuart,
			We discussed this last this evening and I
			promised to get back to you with some
			ideas regarding the overlap, as it were,
			between Building Regs and Policy 13 of
			CLP.
			My reading of 'Building Regulations
			Access to and Use of Buildings 2015':
			- the phrase 'optional requirements'
			refers to part (2) and (3) whereas part
			(1) is mandatory (unless one of the
			other more demanding and optional
			parts is adopted). I think a developer
			must either make dwellings fulfil the
			requirements of Part 1 or upgrade
			selected ones to Part 2 or Part 3.
			- therefore there is no 'proportion' of
			fully accessible buildings (Part 2) set out
			within the BRegs. So the 'more than' in
			the existing policy makes no sense, it
			seems to me.
			The policy could read:
			Development proposals which exceed
			the Local Plan Policy 13 requirement of
			25% of dwellings on sites larger than 10
			dwellings as fully accessible dwellings, as
			set out in Building Regulations AD
			M4(2), will be supported, to help

	Policy	Policy title	Comments	NDP SG mtg 29 03'22
				address a shortage of accessible homes for an ageing population. (Plus last sentence)
				My thoughts. Over to you,
				Thanks for your input this evening
				This was SG discussed and implemented.
10	NE1	Areas of Ecological, Landscape, Biodiversity and Geodiversity Value	Fine	Leave as is
11	NE2	Landscape Character and Landscapes of Local Significance (LLS)	Fine	Leave as is
12	NE3	Embedding Green and Blue Infrastructure into New Development	This is probably better covered in your design guide / polices.	Leave as is
13	NE4	Protecting Trees, Woodland and Hedgerows	It will not always be possible to keep all trees and hedgerows, in some cases, it will be appropriate to provide alternative green infrastructure elsewhere on site and in some cases offsite. I couldn't find the Appendix to look at the extent of protected trees / hedgerows.	Agreed to adopt the suggestion by Lucy. ST to adapt the BS5837:2012 reference to also say this ""
14	NE5	Biodiversity Net Gain in New Development	Not sure that this adds anything to the policies in the CEDPD / Biodiversity SPD? You should ensure that your NDP is adding local priorities that complement Local Plan policies.	Leave it in.
15	NE6	Settlement Gaps and Green Buffers	Although these areas are marked on a map, I think there needs to be some additional text justification for the policies.	Later (2023) SG discussion that don't think additional text as the last sentence in 6.2.2 is already clear on this.
16	NE7	Important Views and Vistas	No conflict with LP or emerging CE DPD.	

	Policy	Policy title	Comments	NDP SG mtg 29 03'22
17	NE8	Local Green Space	All spaces designated as Local Green Space need to meet the following criteria:	ST to add in some text to signpost those
			 where the green space is in reasonably close proximity to the community it serves; 	reading this to look at the supporting evidence that justifies these policies.
			where the green area is demonstrably special to a local community and holds a	(DONE)
			particular local significance, for example because of its beauty, historic	
			significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and	SG to make sure the background paper would show to somebody not familiar with
			 where the green area concerned is local in character and is not an extensive tract of land. 	the local area, why it's important. KH to look at this.
			I note that you have 2 appendices mapping and justifying the designation of these spaces. Examiners are quite strict on accepting these and will often visit proposed LGS to assess their local significance; sites will often be rejected if they are not demonstrably special. For consistency, I'd suggest amending the policy in line with recent LGS policy wording:	WR to look at contacting landowners that will be impacted.
			Suggested Policy text:	
			The areas as described and mapped at Appendix X are designated as a Local Green	
			Space in accordance with paragraph 100 101-2 of the NPPF. Development that would harm the openness or special character of a Local Green Space	
			or its significance and value to the local community will not be permitted unless the	
			proposal can demonstrate very special circumstances that outweigh the harm to the	
			Local Green Space.	
			SG 2023 discussion was that this now seems like standard wording for LGS policies.	
18	NE9	Dark Skies	No conflict with LP or emerging CE DPD. Recommend specifying what the lighting	ST add in a reference to CC mentioned Dark
			measures should be – examples are provided in <u>Dark Night Sky Guidance</u> . You may wish	Night Sky Guidance. (into the policy).
			to consider how best to balance minimising adverse impact on the dark sky with	(DONE)
			"generously proportioned fenestration" advocated in Design Code CA3f. NB the	
			Cornwall Design Guide recommends "large expenses of glazing are positioned in a way	
			to help conserve intrinsically dark landscapes and create or retain dark corridors for	
			nature" and further advice on fenestration is provided in the <u>Dark Night Sky Guidance</u> .	
19	NE10	Coastal Vulnerability Zone	Seeking further input on these policies and will send separately.	

	Policy	Policy title	Comments	NDP SG mtg 29 03'22
20	NE11	Development and the Coastal Management Plan	Not sure that this policy is needed – suggest removal.	The text of this policy was provided by CC, so SG voted to leave it in.
21	EW1	Renewable Energy and Community Energy Projects	Comments to follow	
22	EW2	Non-mains Sewer Wastewater	Comments to follow	
23	TT1	Transport Plan	fine	
24	TT2	Transport Assessments & Travel Plans	fine	
25	TT3	Dedicated Parking for New Non- residential Development	No conflict with LP or emerging CE DPD. Might be helpful to include reference to EV charging infrastructure.	ST to put a comment in TT3 to refer to section 4 of BER2, where we have mentioned it. (DONE)
26	TT4	Safeguarding the Disused Railway	fine	
27	TT5	Protecting Existing Car Parking Capacity in Perranporth	No conflict with LP or emerging CE DPD.	
28	TT6	Preventing Loss of Car Park Capacity	No conflict with LP or emerging CE DPD.	
29	TT7	Beach Road Car Park	No conflict with LP or emerging CE DPD.	
30	TT8	Noise from Development at Trevellas Airfield	fine	
31	LW1	New Community and Cultural Facilities	fine	
32	LW2	New Sports Facilities	fine	
33	LW3	Providing Community	It might be better to link provision of infrastructure to community priorities – so have a policy that states that CIL or other development funds, should be used to deliver community priorities – these priorities can then be regularly reviewed by the parish	SG conversation. RK withdrew his objection post comments from ST on how this can work depending on the examiner.

	Policy	Policy title	Comments	NDP SG mtg 29 03'22
		Infrastructure to Match Demand	council. [Note that education contributions are already taken where appropriate from new development, health care facilities are often privately owned and so would not necessarily be eligible.]	Also noted was that the plan is already doing some of what CC suggests in lower section 9.3 "Community Actions and Projects".
34	HE1	Heritage Assets and the Historic Environment	I think your heritage policies need some consolidation. Where a policy requirement is addressed in CLP policy 24, it should not be duplicated here. In general though we are happy with the content.	Leave as is.
35	HE2	Signs and Advertising		Leave as is.
36	HE3	Conservation Areas and Non- designated Historic Settlements		Leave as is.
37	HE4	Historic Landscape Character		Leave as is.
38	HE5	Cornwall and West Devon WHS Area A7 St Agnes Mining District		Leave as is.
39	HE6	St Piran's Church and St Piran's Oratory		Leave as is.
40	HE7	Penhale Camp and Assets within its Boundaries and Setting	Update in line with HE comments	ST to update this in line with CC comments / suggestion. "we note that Policy HE7 (DONE)
41	HE8	Perranzabuloe's Prehistoric Assets and Landscape		Leave as is.
42	HE9	Newly Identified Heritage Assets and Archaeological Remains		Leave as is.
43	HE10	Accessibility to Heritage Assets		Leave as is.

	Policy	Policy title	Comments	NDP SG mtg 29 03'22
44	BER1	Preventing Loss of	Does the policy apply only to the 'Employment Areas' on maps 19-21. What about on	SG do want the focus to be on the identified
		Existing	an existing business site that is not in one of the identified locations? May need	key employment areas. So no change to be
		Employment Areas	clarification but otherwise fine.	made.
45	BER2	Quality	Add a further condition to the list in iii) h) heritage assets	Yes, adopt the suggestion.
		Employment		
4.0	DED3	Premises Expansion of	Add a fronth an ann distant to the list in iii) h) h anita an ann ta	Vac adapt the average in
46	BER3	Employment Sites	Add a further condition to the list in iii) h) heritage assets	Yes, adopt the suggestion.
47	BER4	New Technology and Hi-tech	Does this policy apply anywhere within the parish? Suggest clarification about impact on landscape etc.	SG agreed to let ST do this. (DONE)
		Industries	on landscape etc.	
48	BER5	Digital	fine	
		Communication		
		Infrastructure		
	255	Improvements		
49	BER6	Live / Work	fine	CT to a second and the title and the title and the title
50	BER7	Small Scale Business Initiatives	Fine – but why is the policy limited to start up firms?	ST to amend so that it applies to all firms. (DONE)
51	BER8	A30 Corridor	See comments from NE - In terms of whether a full SEA is required, the	Suggestion of sub point 6.
		Business	trigger for such a requirement from a heritage perspective tends to be	
		Opportunity Area	where a Plan proposes to allocate sites for development, usually	SG agree that this be added.
			housing. We note that there are no housing site allocations proposed but	
			our attention is drawn to Policy BER8. Although this states that the policy	
			is not a site allocation it nonetheless identifies a number of "preferred	
			indicative locations for the expansion of employment premises	
			where provision cannot be made within the settlement boundaries.	
			These areas are not allocated sites but indicate an "in principle" preference."	
			Our interpretation of this provision is that it is intended to send a	
			message to potential developers of where the community prefers such	
			development to take place. But we can find no evidence on the Plan's	
			website beyond reports of broad liaison with commercial agents to substantiate the means by which these locations have been identified, or	

	Policy	Policy title	Comments	NDP SG mtg 29 03'22
			the criteria which might have been used to gauge their suitability in planning terms. Notwithstanding the assertion to the contrary, we would consider that this policy as drafted represents a de facto allocation of the sites in question, and potentially a hostage to fortune provision given the apparent absence of evidence to demonstrate that there is at least a reasonable degree of delivery and an absence of harm to what may be relevant heritage assets.	
			There is no reason why such aspirations should not feature somewhere in the Plan, but in the absence of evidence perhaps in the supporting text or as an appendix. We note that other policies highlighting even only thematic opportunities for development include criteria or qualifications requiring development to conform with other policies in the Plan and elsewhere. While the sites proposed in BER8 might or might not have the potential to generate significant environmental effects for the historic environment, there is no evidence to inform this consideration one way or the other.	
			We would therefore recommend that either the aspiration is removed as a formal policy, or provision is made within the wording of the policy that any exploration of the potential for development of the sites must demonstrate that it can be accommodated without causing harm to heritage assets.	
			On this basis we would be happy to concur with the view that a full SEA is not required. As the Plan stands we must advise that we are unable to agree that a full SEA is not required.	
52	BER9	Perranporth Village Centre Uses	Note that many changes will be covered by permitted development rights. In addition, change of use within the same use class is permitted- so you cant control changes from any 'E' use to another 'E' use.	Para 4 is intended to make sure ground floor level stays business use. This is vital and key for Perranporth Village Centre.
			Recommend that the requirement to show 9/12 month usage is moved to the supporting text. Remove para 4.	

	Policy	Policy title	Comments	NDP SG mtg 29 03'22
			May be better if you change / simplify the policy - keep the map defining the primary and secondary areas. State that 'E' uses are preferred in the primary area, with 'E' and other uses in the secondary area.	
53	BER10	Shop Front Design in Perranporth	I think it would be useful to combine the next 6 policies (BER 10 – 15) into a single one – 'Commercial development in Perranporth, Goonhavern and Bolingey' (provisions specific to Perranporth only should be under a different bullet point). This will make it easier for planning officers to use. We're putting together a design guide for retail to residential frontage alterations in light of the Use re-classifications. It might be useful to include a reference to this guide in preparation for its release	SG agreed to leave as separate.
54	BER11	Perranporth Village Centre Traffic, Circulation and Wayfinding	See above	SG agreed to leave as separate.
55	BER12	Perranporth Village Centre Areas of Intervention	No conflict with LP or emerging CE DPD.	SG agreed to leave as separate.
56	BER13	Retail Expansion in Perranporth, Goonhavern and Bolingey	See above	SG agreed to leave as separate.
57	BER14	Provision for (Consumer) Waste Facilities at Hot Food Takeaways in Perranporth, Goonhavern and Bolingey	See above	SG agreed to leave as separate.
58	BER15	Supporting Community Shops, Food and Drink Premises and Services	See above	SG agreed to leave as separate.

	Policy	Policy title	Comments	NDP SG mtg 29 03'22
59	TO1	Existing and New	Policy TO1 (para 1) goes further than local plan policy 5 in that it prevents any change	SG view is that if a caravan or camping etc
		Static Caravan,	of use or diversification of existing caravan sites. Suggest that you change it to better	site stops serving that function, it returning
		Camping, Glamping	reflect policy 5 of the local plan – loss of business space where it can be demonstrated	to being a wild (undeveloped) site.
		and Towing	that the business is unviable / unmarketable. Para 2 and 3 are fine.	
		Caravan Sites		
60	TO2	New Built Tourist	fine	
		and Visitor		
		Accommodation		
		(Bed and Breakfast,		
		Hotels, Guest		
		Houses and		
		Purpose-built		
		Holiday Lets and		
		Lodges)		
61	TO3	Broadening the	fine	
		Visitor and Tourism		
		Offer through		
		Sustainable and		
		Wet Weather		
		Attractions		