

## Lanteglos by Fowey Regulation 16 Statutory Consultation Responses

	Regulation 16 Consultation Responses
Natural England 10/3/20	<p>Thank you for your consultation on the above dated 05 March 2020</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.</p> <p><b>Natural England does not have any specific comments on the Fowey Neighbourhood Development Plan.</b></p> <p>For any further consultations on your plan, please contact:  <a href="mailto:consultations@naturalengland.org.uk">consultations@naturalengland.org.uk</a>.</p> <p>Yours sincerely            Jacqui Salt            Consultations Team</p>
South West Water 12/3/20	<p>Emma regarding the above South West Water has no comment other than to advise that we have previously been approached by The Steering Group Chairman and have advised the same.</p> <p>Regards            Martyn Dunn Pre-Development Technical Advisor</p>
Historic England 15/4/20	<p>Dear Emma</p> <p>Thank you for your Regulation 16 consultation on the submitted version of the Lanteglos Neighbourhood Plan.</p> <p>I can confirm that there are no issues associated with the Plan upon which we wish to comment.</p> <p>Kind regards</p> <p>David            David Stuart   Historic Places</p>
Highways England 17/3/20	<p>Thank you for providing Highways England with the opportunity to comment on the submission version of the Lanteglos-by-Fowey Neighbourhood Plan. We are responsible for operating, maintaining and improving the strategic road network (SRN) which in this case comprises the A30 which passes some distance to the north of the plan area.</p> <p>We are satisfied that the proposed policies within the plan are unlikely to result in development which will adversely impact the SRN and we therefore have no specific comments to make. This does not however prejudice any future responses Highways England may make on site specific applications as they come forward through the planning process, and which will be considered by us on their merits under the prevailing policy at the time.</p> <p>Kind regards            Gaynor  <b>Gaynor Gallacher</b>  <b>South West Operations – Assistant Planning Manager (Highways Development Management)</b></p>

<p>Marine Management Organisation 5/3/20</p>	<p>Dear Sir/Madam,</p> <p>Please be aware that any works within the Marine area require a licence from the Marine Management Organisation. It is down to the applicant themselves to take the necessary steps to ascertain whether their works will fall below the Mean High Water Springs mark.</p> <p>Response to your consultation</p> <p>The Marine Management Organisation (MMO) is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are; marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing European grants.</p> <p>Marine Licensing</p> <p>Activities taking place below the mean high-water mark may require a marine licence in accordance with the Marine and Coastal Access Act (MCAA) 2009. Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence. You can also apply to the MMO for consent under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts in England and parts of Wales.</p> <p>The MMO is also the authority responsible for processing and determining harbour orders in England, and for some ports in Wales, and for granting consent under various local Acts and orders regarding harbours. A wildlife licence is also required for activities that that would affect a UK or European protected marine species.</p> <p>Environmental Impact Assessment</p> <p>With respect to projects that require a marine licence the EIA Directive (codified in Directive 2011/92/EU) is transposed into UK law by the Marine Works (Environmental Impact Assessment) Regulations 2007 (the MWR), as amended. Before a marine licence can be granted for projects that require EIA, MMO must ensure that applications for a marine licence are compliant with these regulations.</p> <p>In cases where a project requires both a marine licence and terrestrial planning permission, both the MWR and The Town and Country Planning (Environmental Impact Assessment) Regulations <a href="https://eur03.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.legislation.gov.uk%2Fuk%2Fsi%2F2017%2F5+71%2Fcontents%2Fmade&amp;data=02%7C01%7CNeighbourhoodplanning%40cornwall.gov.uk%7Cc2629d74d9224a2e073708d7c0ffe93c%7Cefaa16aad1de4d58ba2e2833fd5dd29f%7C0%7C0%7C637190078240095378&amp;reserved=0">https://eur03.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.legislation.gov.uk%2Fuk%2Fsi%2F2017%2F5+71%2Fcontents%2Fmade&amp;data=02%7C01%7CNeighbourhoodplanning%40cornwall.gov.uk%7Cc2629d74d9224a2e073708d7c0ffe93c%7Cefaa16aad1de4d58ba2e2833fd5dd29f%7C0%7C0%7C637190078240095378&amp;reserved=0</a> may be applicable.</p> <p>If this consultation request relates to a project capable of falling within either set of EIA regulations then it is advised that the applicant submit a request directly to the MMO to ensure any requirements under the MWR are considered adequately.</p> <p><b>Marine Planning</b></p> <p>As the marine planning authority for England the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the mean high-water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high-water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. Marine plans will inform and guide decision makers on development in marine and coastal areas. On 2 April 2014 the East Inshore and Offshore marine plans were published, becoming a material consideration for public authorities with decision making functions. The East Inshore and East Offshore Marine Plans cover the coast and seas from Flamborough Head to Felixstowe. For further information on how to apply the East Inshore and Offshore Plans please visit our Marine Information System. The MMO is currently in the process of developing marine plans for the South Inshore and Offshore Plan Areas and has a requirement to develop plans for the remaining 7 marine plan areas by 2021.</p>
--	---

	<p>Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure that necessary regulations are adhered to. For marine and coastal areas where a marine plan is not currently in place, we advise local authorities to refer to the Marine Policy Statement for guidance on any planning activity that includes a section of coastline or tidal river. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act and the UK Marine Policy Statement unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our online guidance and the Planning Advisory Service soundness self-assessment checklist.</p> <p>Minerals and waste plans and local aggregate assessments</p> <p>If you are consulting on a mineral/waste plan or local aggregate assessment, the MMO recommend reference to marine aggregates is included and reference to be made to the documents below:</p> <ul style="list-style-type: none"> <li>* The Marine Policy Statement (MPS), section 3.5 which highlights the importance of marine aggregates and its supply to England's (and the UK) construction industry.</li> <li>* The National Planning Policy Framework (NPPF) which sets out policies for national (England) construction minerals supply.</li> <li>* The Managed Aggregate Supply System (MASS) which includes specific references to the role of marine aggregates in the wider portfolio of supply.</li> <li>* The National and regional guidelines for aggregates provision in England 2005-2020 predict likely aggregate demand over this period including marine supply.</li> </ul> <p>The NPPF informed MASS guidance requires local mineral planning authorities to prepare Local Aggregate Assessments, these assessments have to consider the opportunities and constraints of all mineral supplies into their planning regions - including marine. This means that even land-locked counties, may have to consider the role that marine sourced supplies (delivered by rail or river) play - particularly where land based resources are becoming increasingly constrained.</p> <p>If you require further guidance on the Marine Licencing process please follow the link <a href="https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.gov.uk%2Ftopic%2Fplanningdevelopment%2Fmarinelicences&amp;data=02%7C01%7CNeighbourhoodplanning%40cornwall.gov.uk%7Cc2629d74d9224a2e073708d7c0ffe93c%7Cefaa16aad1de4d58ba2e2833dfdd29f%7C0%7C0%7C637190078240095378&amp;msdata=NYFmKa%2F79RIXldttMxdXWP3vSbfpKvQrrVP7K8M1bSM%3D&amp;reserved=0">https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.gov.uk%2Ftopic%2Fplanningdevelopment%2Fmarinelicences&amp;data=02%7C01%7CNeighbourhoodplanning%40cornwall.gov.uk%7Cc2629d74d9224a2e073708d7c0ffe93c%7Cefaa16aad1de4d58ba2e2833dfdd29f%7C0%7C0%7C637190078240095378&amp;msdata=NYFmKa%2F79RIXldttMxdXWP3vSbfpKvQrrVP7K8M1bSM%3D&amp;reserved=0</a></p> <p>Regards Andy</p>
CC Affordable Housing Team 29/3/20	<p>Thank you for consulting the Affordable Housing Team, Please see below comments:</p> <p>Policy 9 of the NDP – relates to infill housing development. This policy does not currently refer to any Local Plan policy contributions.</p> <p>Policy 8 of the Local Plan states that ‘All new housing schemes within the plan area on sites where there is a net increase of more than 10 dwellings or where dwellings would have a combined gross floorspace more than 1,000 square metres (not including replacement dwellings) must contribute towards meeting affordable housing need.</p> <p>In Designated Rural Areas and Areas of Outstanding Natural Beauty, the threshold will be more than 5 dwellings. For developments of between 6 and 10 dwellings in such areas a financial contribution in lieu of on-site provision of affordable housing will be sought per unit of affordable housing that would have been provided. Subject to considerations in policy 10, developments should provide the target levels of affordable housing as set out below: 50% in Zone 1 40% in Zone 2 35% in Zone 3 30% in Zone 4 25% in Zone 5’</p> <p>Lanteglos by Fowey is in Zone 2, which has a target Affordable Housing Policy contribution of 40%.</p> <p>Policy 10 of the NDP - has been amended to reflect previous comments. However, the following statement within the Policy should also state that any reductions cannot be less than 50% of the land take and not less than 50% of the numbers of dwellings provided.</p>

	<p>3) The proposal has a target of 100% affordable housing. Any reduction will need to be supported by a viability assessment</p> <p>Sarah Roberts Senior Development Officer</p>
<p>Cornwall Council Lead Local Flood Authority 27/3/20</p>	<p>The LLFA has been consulted on the application below.</p> <p>Application Number    PA20/00002/NDP</p> <p>Proposal                    Plan proposal submitted for the Lanteglos by Fowey Neighbourhood Plan of April 2020.</p> <p>Location                    Lanteglos By Fowey Cornwall</p> <p>Applicant                    Lanteglos By Fowey Parish Council</p> <p>The LLFA has considered the submissions and directs the Lanteglos by Fowey Parish towards the Neighbourhood Planning Flooding and Drainage- Key Considerations document (link below).</p> <p><a href="https://www.cornwall.gov.uk/media/31342803/flooding-and-drainage-guidance-note-v5.pdf">https://www.cornwall.gov.uk/media/31342803/flooding-and-drainage-guidance-note-v5.pdf</a></p> <p>Flood risk, coastal erosion and sustainable drainage appears to be overlooked by the current submission, but should be considered as part of all new development proposals. The link above should offer some assistance. Please reconsult the LLFA if the Parish wishes to amend and resubmit their document to include flood risk, coastal erosion and sustainable drainage.</p> <p>Kind regards</p> <p>Jackie Smith Sustainable Drainage Lead Officer</p>
<p>National Grid 14/4/20</p>	<p><b>Lanteglos by Fowey Neighbourhood Plan Regulation 16 Consultation March – April 2020</b></p> <p><b>Representations on behalf of National Grid</b></p> <p>National Grid has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.</p> <p><b>About National Grid</b></p> <p>National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators across England, Wales and Scotland.</p> <p>National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.</p> <p>National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.</p> <p><b>Proposed development sites crossed or in close proximity to National Grid assets:</b></p> <p>An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines. National Grid has identified that it has no record of such assets within the Neighbourhood Plan area.</p> <p>National Grid provides information in relation to its assets at the website below.</p> <ul style="list-style-type: none"> <li>• <a href="http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/">www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/</a></li> </ul> <p>Please also see attached information outlining guidance on development close to National Grid</p>

	<p>infrastructure.</p> <p><b>Distribution Networks</b></p> <p>Information regarding the electricity distribution network is available at the website below:  <a href="http://www.energynetworks.org.uk">www.energynetworks.org.uk</a></p> <p>Information regarding the gas distribution network is available by contacting:  <a href="mailto:plantprotection@cadentgas.com">plantprotection@cadentgas.com</a></p> <p><b>Further Advice</b></p> <p>Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:</p> <p><b>Matt Verlander, Director</b>  <a href="mailto:nationalgrid.uk@avisonyoung.com">nationalgrid.uk@avisonyoung.com</a></p> <p><b>Spencer Jefferies, Town Planner</b>  <a href="mailto:box.landandacquisitions@nationalgrid.com">box.landandacquisitions@nationalgrid.com</a></p>
<p>Devon and Cornwall Police 14/3/20</p>	<p>Re Planning Application PA20/00002/NDP   Plan proposal submitted for the Lanteglos by Fowey Neighbourhood Plan area. The (regulation 16) statutory six week consultation will run between the 5th of March and the 16th of April 2020.   Lanteglos By Fowey Cornwall</p> <p>Dear Ms Ball, Thank you on behalf of Devon and Cornwall Police for the opportunity to comment on this application.</p> <p>I note and welcome the references to designing out crime within the NDP which are obviously fully supported. I have no further comments to add at this time</p> <p>Yours sincerely,</p> <p>Martin Mumford Police Designing Out Crime Officer</p>
<p>Catchments and Coast Team and Environmental Growth 30/4/20</p>	<p>Dionne Jones, Senior Environment Officer Catchments and Coast Team and Environmental Growth (Strategic Environment)</p> <p><b>Summary</b></p> <p>This is a well written and succinct document. I'm encouraged that this community value their landscape and green spaces so highly. Whilst climate change mitigation is considered, the NDP could do more to promote climate change adaptation in the parish. Possible climate change impacts to consider include increased coastal erosion, sea level rise, increased fluvial and surface water flooding, storm damage and summer overheating of buildings. The <i>Shoreline Management Plan</i> has a "No Active Intervention" policy for the undeveloped coast in this parish. This means there may be future issues with the loss of important habitats on the parish's coast and river valleys due to coastal erosion. It's therefore important that the land behind the most vulnerable habitats is protected from any form of development or land use that would prevent the future roll-back or recreation of those habitats ("coastal squeeze").</p> <p>I was pleased to see a policy on marine heritage. This aligns with the outcomes and objectives in <i>Cornwall Maritime Strategy</i>. Likewise, the biodiversity policies are in alignment with the <i>Cornwall Environmental Growth Strategy</i> – particularly where they promote enhancement and</p>

net gain.

I have made some suggestions below on additional evidence sources that could be referenced and some minor edits that could be made to strengthen local resilience to climate change and coastal change in the Lanteglos-by-Fowey NDP.

### **Coastal Change**

4.4 I recommend that the evidence documents include the *Shoreline Management Plan (SMP)*. The SMP is a material consideration for planning and can provide additional evidence for the policy justification sections of the NDP. Referencing the Shoreline Management Plan in the NDP document and evidence base will encourage planning applicants to review it at an early stage and thus avoid any unexpected planning requirements.

The SMP is a policy document for coastal defence planning which sets out the recommended approach to managing the shoreline over the next 100 years. Lanteglos-by-Fowey parish is covered by *Policy Development Zone 1: Rame Head to Pencarrow Head* and *PDZ 2: Pencarrow Head to Gribbin Head*. The SMP management intent for PDZ 1 and PDZ 2 is to: “...maintain the natural amenity value of the area and allow natural processes, which sustains community identity and commercial viability and recognises the tourist and recreation importance of the area.”

Within PDZ 1 the relevant Management Unit is *MA 03 Seaton to Pencarrow Head*. The relevant Policy Unit is PU 3.1 where the policy intent is “No Active Intervention” for undefended cliffs and beaches in order to meet the objectives of the Heritage Coast, AONB and SSSI designations.

Within PDZ 2 the relevant Management Area is *MA04*. The relevant Policy Units are PU 4.1 and 4.2 where the policy intent is “Hold the Line” at Polruan and “No Active Intervention” along the open coast, undefended cliffs and coves.

I recommend including a requirement in the NDP that “Development should be consistent with the management policies in the Shoreline Management Plan.”

SMP2: <https://www.cornwall.gov.uk/environment-and-planning/countryside/estuaries-rivers-and-wetlands/flood-risk/coastal-erosion-and-shoreline-management/shoreline-management-plans/shoreline-management-plan-2011-smp2/>

SMP2 review 2016: <https://www.cornwall.gov.uk/environment-and-planning/countryside/estuaries-rivers-and-wetlands/flood-risk/coastal-erosion-and-shoreline-management/shoreline-management-plans/shoreline-management-plan-review-2016/>

Please signpost to the Cornwall draft *Planning for Coastal Change Chief Planning Officer’s Advice Note* for more detailed guidance on development proposals close to the shoreline: <https://www.cornwall.gov.uk/environment-and-planning/planning/planning-policy/adopted-plans/planning-policy-guidance/cornwall-planning-for-coastal-change/>

The NDP could be future-proofed by requiring that development is consistent with the guidance and policies in the *Climate Change Development Plan* Document currently being developed by Cornwall Council for publication in 2021. The DPD will include planning policies and spatial mapping to enable sustainable management of coastal change.

### **Coastal erosion and public access**

The map extract below shows how the long term NCERM-NAI-05 coastal erosion line (red) would affect the existing public rights of way (pink) along the parish’s coastline. There are some points at which public paths may need to roll back as the coastline erodes. The undeveloped open

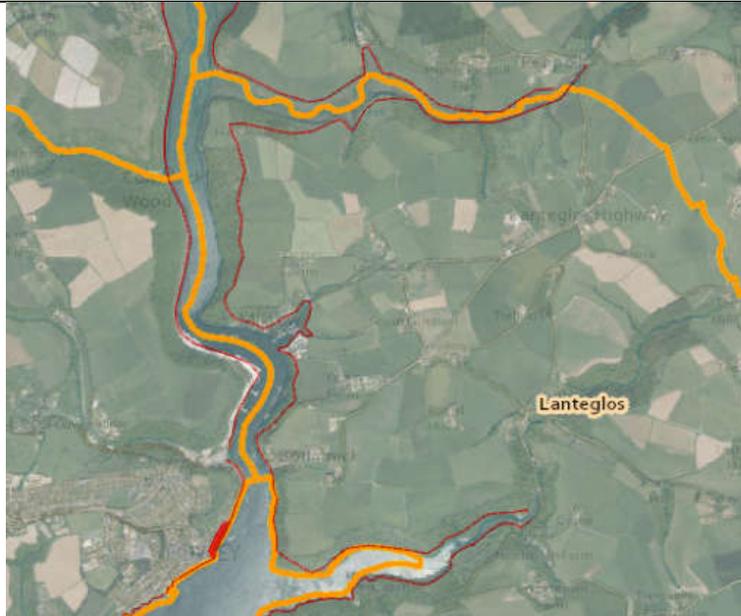
nature of this coast should make re-routing paths feasible along most of its length. Providing the land behind these paths remains undeveloped, public access to the coast should be resilient to coastal change. The two parcels of CRoW Access Land either side of Lantic Bay are on the landward side of the erosion line but could be very close to the cliff edge.



The map extract below shows that predicted long term coastal change would result in the shrinkage of habitat along the coast, particularly of the internationally important [Polruan to Polperro SAC](#). Quite a large stretch of this coastal habitat could be lost in the area to the west of Lantic Bay where this would interrupt the continuity of the SAC. The community may wish to consider planning for roll-back of the SAC into the arable fields and grassland behind the erosion line to help conserve the continuity of this habitat. I recommend consulting the Environment Agency, Natural England, Cornwall Wildlife Trust and the National Trust on the approach to be taken. [The NDP should discourage any inappropriate development or land use in the land behind the erosion line to prevent future issues with coastal squeeze limiting roll-back of the SAC.](#)



The map extract below shows how two estuarine woodland corridors could also be lost to coastal erosion between Bodinnick and Penpol Creek. [Any proposals in the landscape behind these woods should be encouraged to support their future replacement by providing space for appropriate tree planting or natural regeneration in the fields landward of the erosion line.](#)



The map extract below shows that the County Geology Site at Great Lantic Beach will one day be lost to coastal erosion. This can't be replaced, just recorded. Likewise for the many historic environment features that sit seaward of the long term coastal erosion line.



These maps are available through Cornwall Council's online interactive mapping tool at: <https://www.cornwall.gov.uk/community-and-living/mapping/>

Note the following recommendation in the SMP for MA 04: *"...heritage interests include Palace Cove in the far west of the management area (around 1km east of Pencarrow Head) has locally important remains of a harbour and fish cellars and whilst not dictating policy, these features should be recorded before the natural erosion and weathering causes them to be lost."*

When writing the policy justifications any coastal change or flood management policies would align with the following outcome in **Cornwall Maritime Strategy 2019-2023**:

- Target Outcome D: *"Cornwall has healthy, safe and vibrant coastal communities that have a strong relationship with the sea and coastal environment."*  
Objective D7: *"Use a place-based approach to strengthen the resilience of maritime communities to the social, environmental and economic impacts arising from future events and shocks, including natural hazards, climate change and socio-political change."*

#### **Flood Risk**

The Sustainability appraisal is incomplete for flood risk and there are no specific policies covering this risk. This is one area where the NDP's contribution towards community resilience could be strengthened.

Please refer to the following Neighbourhood Planning *Flooding and Drainage* Guidance Note for

advice on the role NDP's have to play in reducing flood risk:

<https://www.cornwall.gov.uk/environment-and-planning/planning/neighbourhood-planning/preparing-a-neighbourhood-plan/neighbourhood-planning-guide-notes-and-templates/#-tab-359262>

The map extract below shows where the Environment Agency's Flood Zones 2 and 3a (pink) are located in the parish. The main fluvial (river) flood risk is along Pont Pill river.



Flood Zone 3a comprises land assessed as having between a 1 in 100 or greater annual probability of river flooding (>1%) or a 1 in 200 or greater annual probability of flooding from the sea (>0.5%) in any year. All development proposals within this zone should be accompanied by a Flood Risk Assessment.

The main areas at risk from surface water flooding can be viewed on Cornwall Council's interactive mapping website at <https://www.cornwall.gov.uk/community-and-living/mapping/>

The NDP could increase the parish's resilience to surface water flooding by encouraging the use of green open Sustainable Drainage Systems (SuDS) in new developments. Green SUDS reduce maintenance costs and provide biodiversity and public realm/green corridor enhancements. New developments should consider the location of SUDS, green infrastructure and paths at concept stage. Please signpost to Cornwall Council's Sustainable Drainage policy at: <https://www.cornwall.gov.uk/environment-and-planning/countryside/estuaries-rivers-and-wetlands/flood-risk/sustainable-drainage-systems/>

The Strategic Flood Risk map also includes projections of sea level rise. The main area likely to be affected by sea level rise in this parish is Penpol Creek, with the main impact being on the BAP mud flat habitat in the creek. See:

<https://map.cornwall.gov.uk/website/ccmap/index.html?zoomlevel=3&xcoord=211869&ycoord=53767&wsName=sfra&layerName=>

*Cornwall Local Flood Risk Management Strategy* provides further information and guidance around which policies can be formulated. The strategy is being refreshed this year. See: <https://www.cornwall.gov.uk/environment-and-planning/countryside/estuaries-rivers-and-wetlands/flood-risk/local-strategy/>

There doesn't appear to be a *Community Emergency Plan* for this parish:

<https://www.cornwall.gov.uk/community-and-living/cornwall-fire-and-rescue-service->

[homepage/keeping-safe/community-safety/tackling-risk/cornwall-community-resilience-network/community-emergency-plan-groups/](https://www.cornwall.gov.uk/keeping-safe/community-safety/tackling-risk/cornwall-community-resilience-network/community-emergency-plan-groups/)

Map:

<https://map.cornwall.gov.uk/website/ccmap/index.html?zoomlevel=3&xcoord=211869&ycoord=53767&wsName=sfra&layerName=Community%20emergency%20plans>

## Environmental Growth

9.25 **Biodiversity net gain** is now mandated in planning policy. It's good that the NDP reinforces this. Please signpost to Cornwall Council's website for more detailed guidance for planning applicants: <https://www.cornwall.gov.uk/environment-and-planning/planning/planning-policy/adopted-plans/planning-policy-guidance/biodiversity-net-gain/>

9.26 **Retention of existing Cornish hedges should be strongly encouraged.** The habitats and wildlife corridors they provide are not quickly replaced. They are also a key part of the parish's distinctive and irreplaceable historic landscape as well as natural climate change resilience features. The following sentence currently appears to give permission to remove Cornish hedges: *"Where biodiversity features such as Cornish hedges are to be lost the impacts should be adequately mitigated and compensated for."* I would replace this with a more positive sentence, perhaps: *"Proposals that retain and enhance Cornish hedges will be supported"*. Enhancement could mean repairing gaps or damage to hedges, connecting new and existing hedges to expand wildlife corridors and increasing public appreciation of the value and distinctiveness of Cornish hedges. There are some useful resources on Cornish hedges here: <https://www.cornwall.gov.uk/environment-and-planning/trees-hedges-and-woodland/hedges/publications-about-cornish-hedges/>

9.28: A **net gain in biodiversity** is the recognised term (suggest 'wildlife' is replaced with 'biodiversity'). The rest of this sentence and Policy 6 aligns well with the intent of *Cornwall Environmental Growth Strategy*. I support the strong steer to deliver in accordance with *Cornwall Planning for Biodiversity Guidance*. Increasing the connectivity of habitats and encouraging multi-benefit outcomes like dual wildlife corridors, SuDS and active travel routes is all good practice.

The **Cornwall Environmental Growth Strategy** objectives could be quoted in the justification for the policy. This strategy is a material consideration for planning. For instance:

Target Outcome 9: Nature in Cornwall is abundant, diverse and well connected;

- a) *Protection and expansion of the existing, high-quality, backbone of Cornwall's designated terrestrial and marine protected areas, landscapes and heritage.*
- e) *Naturalised river systems and coastal processes, with healthy connections between terrestrial and maritime systems.*
- c) *Reduced intervention and management of natural systems in Cornwall by working with nature.*
- g) *Integrated catchment and coastal management, accounting for landscape scale impacts and opportunities.*

See: <https://www.cornwall.gov.uk/environment-and-planning/cornwall-and-isles-of-scilly-local-nature-partnership/cornwall-s-environmental-growth-strategy/>

The NDP could include a policy that encourages new buildings to be designed to the **Building with Nature** standard. See: <https://www.cornwall.gov.uk/environment-and-planning/grow-nature/news/building-with-nature-a-new-development-benchmark/>

Ideas and steer for policy wording could also be drawn from the draft **Cornwall Design Guide** at: <https://www.cornwall.gov.uk/environment-and-planning/planning/planning-policy/adopted-plans/planning-policy-guidance/cornwall-design-guide/#draftCDG>

	<p><b>Cornwall Maritime Strategy</b></p> <p>I support <i>Policy 5 Marine Heritage</i>. This aligns well with the Cornwall Maritime Strategy. The NDP group may wish to review the Cornwall Maritime Strategy outcomes and objectives when writing the justifications for this policy. The Maritime Strategy is a material consideration for planning. See: <a href="https://www.cornwall.gov.uk/environment-and-planning/maritime-strategy/">https://www.cornwall.gov.uk/environment-and-planning/maritime-strategy/</a></p> <p>The NDP could also signpost to the <b>Cornish Distinctiveness</b> guidance here: <a href="https://www.cornwall.gov.uk/environment-and-planning/strategic-historic-environment-service/heritage-kernow-ertach-kernow/cornish-distinctiveness/">https://www.cornwall.gov.uk/environment-and-planning/strategic-historic-environment-service/heritage-kernow-ertach-kernow/cornish-distinctiveness/</a></p> <p><b>Policy 4 Energy</b></p> <p>I support this policy for its positive approach to carbon reduction and appreciate that it has to be balanced with heritage and local character considerations.</p> <p>Policy 4. 1) encourages energy use to be minimised before renewable energy is specified This is good practice and will reduce the size of renewable energy systems needed. This policy could be backed up with some supporting information in the main text about the Energy Hierarchy to help raise awareness of the full range of design solutions and technologies possible:</p> <ol style="list-style-type: none"> <li>1. <i>Lean</i>: Reduce energy demand (e.g. passive-solar design, triple glazing, air tight, thermal mass, thermal stores, sun pipes, natural ventilation, motion activated lights).</li> <li>2. <i>Mean</i>: Use energy efficiently (e.g. LEDs, A* rated appliances).</li> <li>3. <i>Green</i>: Use renewable energy (e.g. solar, wind, hydro, geothermal, bioenergy, combined with battery storage for extra resilience).</li> <li>4. <i>Clean</i>: Use low carbon energy sources and systems (e.g. heat pumps, CHP).</li> <li>5. Fossil fuels should be avoided – they emit greenhouse gases and will make communities vulnerable to energy supply chain failures and price rises. Fuels that have to be delivered (oil, LPG, wood) are not good for security of supply during prolonged extreme weather events.</li> </ol> <p><b>Replacement Dwellings/ Infill Housing</b></p> <p>The NDP team may wish to consider including a climate resilience policy for replacement dwellings. An issue with replacement dwellings is a reduction in the size of gardens and gardens being replaced with hard surfacing for parking, which reduces habitat connectivity and increases surface water run-off.</p> <p>A suggested policy could be: <i>“Replacement dwellings will be supported where they maintain and preferably enhance habitat connectivity and flood management by retaining trees and green corridors and using permeable surfaces.”</i></p>
Lanteglos by Fowey NDP Steering Group	<p>Dear Sirs</p> <p><b>Plan Proposal submitted for the designated Lanteglos-by-Fowey Neighbourhood Plan PA20/00002/NDP</b></p> <p>I write as Chairman of Lanteglos-by-Fowey Parish Council and Neighbourhood Plan Steering Group as we have two comments to make about the plan referred to above.</p> <ol style="list-style-type: none"> <li>1. At the time when the plan was being drafted we were not aware of the emerging MMO Marine Plan South West. We have since attended a seminar presented by representatives of the MMO and note that there is a comment from them on Cornwall Council’s Planning Portal. From this it is clear that a marine plan will apply up to the mean high-water springs mark and includes the tidal extent of any rivers. They suggest that planning documents for areas with a coastal</li> </ol>

	<p>influence, such as ours, may wish to make reference to the MMOs Licensing requirements and any relevant marine plans to ensure that necessary regulations are adhered to. We consider that adding a clause to that effect would be appropriate. Our own Policy 1.1 and 1.2, Design and Character of Lanteglos-by-Fowey Parish, refers and also CLP24, Historic Environment, as do our Policy 7, Employment Development, and CLP 5, Business &amp; Tourism.</p> <p>2. Earlier this year an application was made for a temporary agricultural dwelling at Frogmore Farm. We advised Jonathan Luker, Senior Planning Officer this should be considered as an annexe to the existing farming enterprise and should always be considered as part of that business. Advice at the time from Ms Emma Ball, Neighbourhood Planning Officer, was that our own Policy 1.1 and 1.2 together with CLP 7 should be sufficiently robust to cover this and we made no changes at the time. Jonathan Luker has since advised that the application as it stands is correct and he is recommendation approval, with any further extension to be applied for in three years' time. In March of this year a new similar application was received for Hall Farm, in the AONB but not in the Conservation Area at Bodinnick. By this time the draft plan was into the Statutory 6, now 8 weeks' Consultation. What we all wish to avoid is an application for a temporary dwelling for an agricultural worker which then turns into something else; an isolated permanent dwelling in the open countryside not necessarily having an agricultural connection, as has happened in Golant, St Sampson Parish. At the time representation from the AONB was not robust enough to prevent this. We have no wish to stand in the way of appropriate development in the countryside We appreciate that this is a living and dynamic entity that needs to have the ability to change and adapt to changing circumstances, and support local jobs and development in agriculture and horticulture. We wonder whether consideration should be given to strengthening what we already have in Policy 1, Design and Character of Lanteglos-by-Fowey Parish. CLP 7.4, Housing in the Countryside, refers to temporary accommodation for agricultural workers, including seasonal migrant workers. We understand from Jonathan that this application has since been withdrawn, the advice being to the applicant to consider locating a temporary dwelling in a less obtrusive place closer to the existing farm building, which is also recommended by the AONB Unit. We know that our Parish is of exceptional landscape quality, which we wish to maintain as a place where people want to live, work and visit.</p> <p>We wish to protect what we have for future generations and hope that what is in our emerging NDP supports this aspiration.</p> <p>Yours faithfully NDP Cllr Dr P A Moore Chairman Lanteglos-by-Fowey Parish Council and Neighbourhood Planning Steering Group</p>
Fowey Town Council 20/3/20	Fully Support
Lansallos Parish Council 17/3/20	Polperro Community Council is fully supportive of the Lanteglos by Fowey Neighbourhood Development Plan.