

Hayle Growth Area Concept Plan: Public Consultation 29 July – 10 August 2020

Comments received

The group appreciates the significant changes made to the draft document presented by Cornwall Council in late 2019.

The climate breakdown is the most urgent situation faced by the Hayle community and any development decisions enacted by Cornwall Council need to fully appreciate the role it plays in ensuring this emergency is alleviated and that the opportunities now presented are fully embraced ;to lead a new era of truly sustainable low carbon communities, that embrace the best built ingredients to grow community cohesion, wellbeing and resilience .

The challenges of climate emergency in Cornwall increase every day that carbon is not mitigated and when our green spaces / biodiversity reduce , due to insensitive poorly planned development and industry .

We welcome and agree with the majority of Hayle Town Councils comments regarding:-

- Extreme traffic Congestion within Hayle and the A30
- Increased concerns regarding extra cars and air pollution
- Need to maintain ‘sense of character ‘, identity of Hayle
- Provision of Community Hall Allotments, community orchard and playing field

Road Changes

The A30 Junction :

In order to mitigate for the loss of the St Erth Causeway link due to future flood risk, an alternative junction is required on the A30 to serve Hayle.

Option 1 : High Lanes

Figure 27. shows the location and initial arrangement of a roundabout junction further east from Tolroy. This is a cheaper junction to construct as the levels are far easier to manage that at Tolroy.

Option 2 : Tolroy

Figure 28 shows the location of a grade separated junction at Tolroy. The DPD allocation allows for a significant amount of safeguarded land to construct the junction due to the significant level differences in this location.

Following discussions with Councillors, their initial preference was for a junction at Tolroy.

We agree with this preference that option 2 offers the best solution to remove the inevitable gridlock that option 1 would inevitably occur and problems that could potentially have for the viability of the development,

Energy

We welcome the fact that the development will be undertaken within the declaration of Cornwall Council Climate Emergency to reach carbon zero by 2030 But there are no reference as to how the scheme enables this target and there is no specification of how the build and how the energy supplies will be carbon neutral.

Electricity should be the only source of energy and in order to reap the said benefits the scheme should include solar photo voltaic, Solar thermal, battery storage and air source heat pumps. Provided, ideally, in conjunction with a community energy scheme.

The Homes for the Future report drafted by the Committee for Climate Change states that the way forward is to regulate for all properties to be free from gas and fossil fuel.

To be equipped with heat pumps highlighting the costs of retrofitting new homes by installing required radiators and water tanks are much more expensive after build and that the UK cannot reach their Carbon Act reduction targets without taking this action in all new builds .

The orientation of houses, given the expected increase in heat related deaths and added consequences of increased insulation and smaller size of new homes requires immediate consideration.

Grey Water Technology and Use

The group recommends that this development needs grey / rain water harvesting technology and promotes street trees and green roofs.

E Charging points and Air Quality

Provision for electric cars and electric bike recharge points as standard , possibly including e car share bays in street sites. As the scheme is relatively close to centres such as the GP, Family Centre ,secondary schools and town hall there should be provision for a green car pool space with associated charging point would be of a benefit to staff .

Additional public transport provision is key and may assist in reducing car use to work in this area

Air quality is paramount to this development. The plan locates most new build density around the main street .The group requests that an air quality assessment to be completed being consistent with a new development under Cornwall Council clean

air for Cornwall strategy, Although Hayle is not listed as one of Cornwall's 7 priority areas within Cornwall Council clean air for Cornwall strategy this proposed development could push the area already at traffic capacity into that domain.

Under the 106 agreement Cornwall Council must ensure that the air quality improvements measures are implemented and reviewed in order to adhere to their declaration of Climate Emergency. This development must not increase the risk of health to the Hayle Community.

Biodiversity and Greenways

As this is a greenfield site it is imperative to retain as many as the green field features such as hedgerows and standard trees to offset the damaging consequences of climate change and to maintain biodiversity. The group recommended a significant increase from the biodiversity net gain Cornwall Council policy of 10 % to be effective and significant. The area is a feeding ground for at risk Curlews and other waders. Any habitat loss is critical to biodiversity in the current climate emergency .

Extreme weather events will impact this community in the future and Cornwall Council have to take bold action to ensure future communities are not severely affected and its citizens protected in the full knowledge of the Climate breakdown .

Medical and Dentistry Provision in an expanding Community

How will these needs be met and will an assessment of need be enacted? There is an acute need for NHS dentistry .Medical centres are at capacity .

As per comment Hayle Draft Masterplan Dec 2019 :-

'NHS Kernow Clinical Commissioning Group Are grateful for early sight of the plan to create a new neighbourhood at Trevassack in Hayle. Would welcome opportunity for further involvement as the planning process develops. The new homes are likely to have an impact on local health services including GP surgeries, particularly Bodriggy Health Centre, which is the only GP surgery in Hayle.

Recommend that wider health partners are included in future conversations, i.e. Cornwall Foundation NHS Trust and Royal Cornwall Hospitals Trust.

Response/ Recommendation: Comments noted. Engagement with health providers has taken place through developing the CSADPD, and will now continue to be progressed in relation to the Masterplan, with a particular emphasis on implications for Bodriggy Health Centre and planning for an appropriate capacity of health facilities in Hayle. This process to be reflected with the next draft of the Masterplan.'

School Location

The Group recommends the school is not located so close to the A30 as shown. The current location increases the risk of air and noise pollution to children and others. The air quality team at Cornwall Council were contacted by the Action Group to look at this in more detail ,but are as yet to respond. It is suggested an air quality assessment is made foreseeing the increase of traffic and any congestion points idling cars prior to the final decision being made.

It is recommended the whole zone has a 20 mph limit and has no access to heavy goods vehicles by physical barriers.

Outstanding Design

This is prime opportunity for this scheme to showcase and lead the way in future proofing ensuring outstanding green development and could be architecturally opened up to the design community to seek a specific award for excellence in Eco design. The group welcomes the ambitions for a 'Passiv' carbon and eco sustainable development . Can this now be ensured and embedded ?

Green Spaces, Community Resilience and Well being

Covid 19 had demonstrated beyond doubt that there is a real robust need for a 'natural health service' being access to nature and open spaces is both therapeutic and essential for good human health . The group recommend the green spaces are not small or token . In addition that these places in the far reaching corners of the build but integral to the development and throughout .

such as wider green pavements . It was noted in the December 19 draft plan consultation with HTC that walk able green spaces are required in Hyale this is a perfect opportunity to put these in place and include residents with disabilities/ mobility issues alongside those who use wheelchairs ,families with buggies and scooters . Enabling increase of pollinators and include space for essential tree planting. <https://www.theguardian.com/environment/2019/jul/18/the-impact-is-tremendous-readers-on-wildflower-verges>

It is a concern of the group after seeing Godrevy Park and Ocean View being built without trees. This was a missed opportunity and in a climate breakdown cannot be repeated .

We welcome the orchard, allotment space and community centre. The group requests full community consolation in achieving these aims regarding design.

Gardens should be standard thorough the scheme regardless of property vlaue .

Does the proposal put in provision for a green fly over for the A30 to enable wildlife to travel and create essential green corridors ? Such as the German initiatives and in UK . <https://www.gov.uk/government/news/green-bridges-safer-travel-for-wildlife>

Can this link into Bug life's initiative to create green routes without gaps .

Has any consideration to date been given to the micro forest project which enables faster carbon benefits . www.shubhendasharma ?

Green spaces are a tool to bond community but must be throughout the development and closer to overlooking , see below.

Devon and Cornwall Constabulary state *'The Plan should consider and incorporate the principles of designing out crime. Encourage creation of places where ownership and a sense of community is fostered. Pedestrian and cycle connections and movement must be as safe as possible. In principle routes should be overlooked along streets providing active frontages that are properly lit. Suggest that younger children's play is located closer to dwellings for greater overlooking. Development blocks should*

provide frontage to green spaces and not have rear gardens backing onto them. Similarly blocks should also address new streets and other public realm areas positively to ensure good natural surveillance’.

Design Code

The Group requests that the Community needs to have an input into the Design Code as all voluntary groups in Hayle .

The Hayle climate Action group wish to have full communication /representation at this stage .

Community Consultation / Ensuring Plans engage and succeed

Due to the Covid emergency we believe this stage has not received adequate community consultation. The Group is concerned that the majority of Hayle residents have not engaged with this potential development . We would welcome the opportunity of a covid secure public facing presentation and Q and A . The story tool is welcomed and could be widely disseminated

Will there be a more detailed exploration of then needs of the voluntary groups in area prior to final decision making regarding community space and use of same. ?

Proposed Community Hall

It is requested that the community space is fully consulted on before a final decision

The group is concerned about the dilapidated small youth centre in Hayle which the HTC now has the additional responsibility for and as stated in the Dec 2019 draft report Hayle **‘lack of larger community space in Hayle’** especially for functions and performing art .

The food bank is a growing organisation w.hich would benefit from finding new facilities and there are other significant voluntary groups such as DIAL, Hayle in Bloom ,Churches, Passmore Edwards ,Hayle Heritage and Hayle Elders Centre.

The group feels that as this is the beginning of the consultation process, and in order to have a vibrant community zone developed this is the perfect time to invest resources, to fully and effectively consult; perhaps engaging in far wider, creative methods than the 'business as usual' model.

The group requests that CC actively investigate approaching the people of Hayle and the non-statutory groups including their volunteers who actively support Hayle. This is a new development and communities take time to form bonds and cohesiveness, real consultation assists in ensuring the success of this ambitious project. The Group feels that the public event and stakeholder held previously were not far reaching or inclusive.

Section 106 should include social enterprises space allocation and seek to promote the engagement of a 'community engagement post' perhaps based within HTC to work within Hayle and its already fantastic existing local groups to create the best seed bed for locality and sustainability healthy street and community of Hayle Town. Hayle Town has no BID or other public facing paid worker.

Homes

Affordability

Potential homes need to be Affordable and not just 20% reduction on market value the Hayle community is deprived in relation to secure wages and many cannot access homes under this criteria. The Group requests at least 30% of the homes are socially affordable 30% - 50% of market rents,

Due to the associated difficulties of leasehold service charges and being locked in, we recommend that homes are not offered on this basis, if they are to be in the hands of a registered social landlord.

That a percentage of homes are fully accessible to wheelchair users.

Numerical Quota

The Group wishes to query the quantity of the overall level of development within Hayle . Can Cornwall Council confirm that the overall development in Halye is not unnecessarily exceeding the Homes for Future statutory quotas and mitigating development in other areas such as Penzance and St Ives to the detriment of the infrastructure in Hayle . The numbers in relation to targets have become somewhat confused in the public domain to date.

I am writing to discuss the proposal for the 600 home development at the south side of Hayle.

We are the farm owners at Tolroy Farm, the fields just across from the proposed development. We welcome the affordable housing and extension of provisions such as hospitals, primary & secondary schoos. However we have two main concerns, light pollution & traffic.

Light pollution is a matter of great importance for not just us but the residents & nature of West Penwith. I'd like to bring your attention to the International Dark Sky Reserve for West Cornwall, which I'm sure you're familiar with. The proposed development sits at the border of the 'Buffer Zone' for this Dark Sky Reserve but action must be taken to mitigate any unnecessary light pollution. Please refer to the 'Model Lighting Ordinance' for future lighting plans on the International Dark Sky Association website (<https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.darksky.org%2F&data=02%7C01%7Cdelivery%40cornwall.gov.uk%7C35da0e1d1d5644f245e008d83d522ed8%7Cefaa16aad1de4d58ba2e2833fdffd29f%7C0%7C0%7C637326770468866688&reserved=0>). We need proper shielding over lamp posts and must consider using dimmer, warmer LEDs with longer-wavelengths, not just for light pollution but also the budgets of Cornwall Council.

We must also consider the way we're lighting the footpaths interconnecting this housing development. Foot-lights are better than overhead lamps and 10ft poles are better than 25ft poles.

Houses should also have shields on top of windows so light is reflected downwards rather than lighting up the sky.

Of course, this will amount to the overall budget for the project in being higher but cost-savings in the long run can add up to energy bills that are 70% lower.

Will the developers act by ensuring the lighting of this development will reduce light pollution where possible?

Secondly, ensuring traffic is reduced going through Hayle should be a key priority of this development. A roundabout fitted into the A30 won't be enough to counter the issue as this will cause chaos on the A30 as we have seen at both Chiverton Cross and Loggan Moor.

Sliproads are categorically required from Tolroy Road for traffic going to and from this development.

On behalf of our client, Burrington Estates, we write to provide representations to the Hayle Concept Plan Summary Document June 2020, in relation to their land interests in Hayle.

Burrington Estates' site forms part of the Trevassack allocation (H-UE1) for approximately 1,000 homes. We are in the process of preparing a planning application for 94 homes (including 28 affordable homes) at Burrington Estates' site within the allocation. Our site is located in the top eastern corner of the allocation (see location plan enclosed), to the north of Viaduct Hill and immediately east of the Kier scheme (PA16/005) for 138 homes which is currently under construction. We are in pre-application discussions with officers at Cornwall Council about the scheme and the intention is to submit a planning application in the Autumn. A technical team is instructed and a draft layout plan is prepared, as enclosed. Our client is committed to delivering a high quality and sustainable scheme at the site, making a significant contribution to housing and affordable housing need for Hayle.

Our Comments

Overall, we support the Hayle Concept Plan Summary Document and its objective to establish a framework within which future planning and proposals within the strategic allocation can be based.

We have some comments on the document, which primarily relate to any potential impact of the provisions and requirements within the draft document on the delivery and implementation of sites within the allocation, and the ability to deliver good masterplanning and urban design. These representations present a coordinated response from the design team with input from our Planners, Masterplanners, Architects, Highways, and Drainage.

Housing Need

We note that page 2 of the document makes reference to a housing requirement for Hayle to 2030 of 600 homes. We assume that this figure is taken from rounding up the residual housing requirement of 513 homes although this is not clear. This needs confirming, and to provide greater clarity, it would be beneficial to include the breakdown of the housing requirement as set out in the Site Allocations DPD and copied below:

Target	1,600
Net Completions (Apr-10 to Mar-16)	119
Net Extant permissions (at Mar-16)	826
Net windfall projection	99
Net additional urban capacity	43
Residual Target	513

Key Principles Checklist

The concept plan and associated parameter plans provide a framework for development of the site. In addition to this, the Hayle Concept Plan Summary Document sets out core principles and aspirations to be considered by design and technical teams for the individual parcels of development that are brought forward within the allocation. The document includes key principles that provide a checklist that summarises the guidance provided in the concept plan technical document as a whole.

We have reviewed the Key Principles Checklist, having particular regard for the potential impact of any of the proposed requirements on the delivery of the allocation. Any onerous requirements could harm the delivery of the allocation which would result in a plan which is not positively prepared and therefore not sound. On this basis, we have the following comments to make on the proposed principles:

- Electric vehicle charging points and the requirement for E-charging points to be provided in the street and private housing areas: The requirement for e-charging points to be provided in the street is impractical as it would be impossible to manage who would the electricity is provided for and by, and how this would be regulated.
- Requirement to be within 400m of a bus stop: Due to the significant size of Trevassack allocation, this is not deliverable or practical and relies on the delivery of new bus routes. Such a requirement could hold up schemes coming forward across the allocation. Sustainability credentials and requirements for Section 106 contributions can be managed through the determination of each planning application across the allocation. Site specific Section 106 agreements is the appropriate mechanism the manage highways contributions and deliverability of infrastructure, not through the imposition of an arbitrary requirement to be 400m of a bus stop.

Concept Plan

We have the following comments on the Concept Plan (Figure 3) in relation to our site:

- The plan shows an 'urban park' on our site. 'Urban parks' are described as parks within the residential areas to enable the retention of existing vegetation, create focal spaces, provide SUDs space, create wildlife corridors and to include play space and growing areas close to homes. In relation to our site, and given its location on the eastern edge of the allocation, a 'park/green space/SUDS area' would be more appropriate than an 'urban park'. In addition, the provision of growing areas would not be appropriate or practical at our site, as these should be centrally located within the allocation to enable accessibility and maintenance.
- In accordance with the Open Space Strategy for Larger Towns (July 2014), our proposal can deliver a LAP. This is in line with Table 8 for Hayle, which notes that for Type 4 provision (equipped children's play) the requirement of 1.58 sqm per dwellings equates to 148.52 sqm for 94 units. This is roughly the size of a LAP and a half.

- In addition, the proposals can provide modest 'Type 2' natural space requirement through the various boundaries, particularly to the north and south which would have a more naturalistic feel to it. 'Type 1' (parks and gardens/amenity green space/civic space) equates to about 505.72 sqm based on Open Space Strategy Table 8 and this would roughly equate to about a third of the linear open space provision to the east. The SuDs basins can be designed to be features within the park, with marginal planting that would also enhance biodiversity and create an aesthetically space that would be managed and form a park. Alternatively, a below ground storage tank would facilitate an amenity use. The green space at the entrance of the site, could also be designed with structural planting to provide further amenity green space/civic space.
- Two access points are shown into our site from the adjacent Kier site to the west. Two accesses from the west are not necessary. Our proposed layout includes an access / link from the adjacent Kier site to the west, which is a vehicle and footpath link, as well as a proposed access from Viaduct Hill to the south which will be the primary access. This proposed two access points have been fully reviewed and assessed by our technical team and are deemed to be a deliverable and robust approach without risk of land ownership or ransom challenges.
- The new potential junction for the A30 will impact our Transport work for the planning application so we would like a better understanding of this, or confirmation whether we proceed with the baseline being the current scenario.
- It appears a roundabout is proposed at the access to our site from Viaduct Hill within the concept plans. Although safeguarding land could be possible should a roundabout be appropriate, necessary and justified at a later stage of development, for a standalone site this is considered to be excessive. We would like to understand the full extent of the proposed roundabout (including any detailed technical drawings). We require this so we can make an allowance for this roundabout as it will impact the proposed site masterplan and planning red line. For the purposes of the development alone, a priority junction/right turn lane is sufficient, subject to detailed traffic modelling

- The current green infrastructure strategy appears to allow for a surface water feature to the eastern boundary of our site. This is approximately in line with our preliminary proposals, albeit we have a bit less space at this stage and as commented above, we are exploring options for a below ground soakaway option. As such, we would like the drainage solution to be flexible in the Concept Plan, so that this can be worked through by the scheme design team to find the most appropriate solution to drainage, and not one imposed by the Concept Plan document.

Whilst the comprehensiveness of the Concept Plan is caveated by the need for future testing, we have the following comments in relation to its current arrangement:

Page 14 of the 'Green Infrastructure Strategy' describes how "existing hedgerows should be retained where possible" and this is reflected by the suggested retention of existing hedgerows on the Figure 3 Concept Plan. In its current form, we would question whether sufficient space for these features has been provided, including where hedgerows overlap residential blocks. If to be retained, the retention of hedgerows is likely to reduce the developable area shown, with knock on implications for housing numbers / development density. Where housing is proposed, we would encourage a bolder approach to hedgerow removal so that coherent and efficient areas of townscape can prevail.

- Consideration should be given to the phasing of delivery to ensure all parcels of land have the necessary infrastructure required as the development is built out. Specifically in relation to drainage, the Concept Plan shows large areas of SuDS are on land to the west near Mellanear Stream and east alongside Strawberry Lane, with little space provided elsewhere for other surface water drainage features. It's important to note that each site will require an FRA to demonstrate how its own surface water runoff will be managed, including the provision of its own SuDS features, as necessary.
- There are two concept plans shown with alternate main street access options, including 'High Lanes' (Pg9) and 'Tolroy' (Pg10). It is considered that the 'High Lanes' option is more favourable because it provides two separate

accesses into the site, thus improving connectivity, public transport circulation and providing better opportunities for 'gateway' creation

Layout & Design

The guidance provided within the Cornwall Design Guide and Street Scape Design Guide could be worked into the design principles of the masterplan and referred to within any accompanying Design and Access Statement, alongside elaboration on how any emerging scheme conforms with the Building with Nature Standards. All schemes should be assessed against the Building for Nature checklist.

In regards to layout design, the requirement for residential development to be in perimeter blocks should be supported, providing frontage onto, and surveillance of, streets and public spaces. This will create neighbourhoods of strong character and should represent a high standard in current layout principles. Designs should also avoid placing rear faces onto streets and green spaces and Cul-de-sacs should be designed out where possible. However, site dimensions may mean some courtyards or cul-de-sacs may be required, but this will be discussed and decided as layouts evolve. In the interest of creating a strong frontage and quality areas of Public Open Space, large expanses of frontage which has limited or no surveillance on public facing streets should be designed out. Boundary treatments proposed should respect and respond to the local area and will be representative of the Cornish Vernacular.

Emerging layouts should include a variety of building typologies and street characters, aided by the use of a variety of storey heights, integrating streets with landscaping, responding to the level changes and using a variety of materials and architectural details that can be found throughout the town.

Requirements for Land Use and varying densities is supported. The densities of residential development will be highest on the main streets and reduced towards the periphery of the development – i.e. near green edges and landscape buffer treatments. This will provide a variety of densities and give consistent form to the street types.

The Main Street will have a varied character along its length in the interest of good placemaking and Urban Design

principles. We support the creation of high quality pedestrian and cycle provision connections, where land ownership allows, and will reinforce their use within emerging layouts. These should be overlooked by streets with active frontages for surveillance and respond to the surrounding existing street network in order to provide good accessibility to existing facilities.

There should be a variety of car parking options including on-street parking, on-plot parking to the side and rear of dwellings, on-street parallel parking, and the use of small parking courts with good surveillance. The parking provision will reflect Cornwall Council parking standards with e-charging points provided on plot or to managed parking areas where possible.

Proposed Section 106 Contributions

The Hayle Summary Document sets out draft Section 106 requirements. Along with affordable housing, the key themes for developer contributions are identified as transportation, green Infrastructure, education, and health.

There will also be additional charges to:

- a. enable the acquisition of land to deliver the primary school;
 - b. enable the acquisition of land for the strategic open space on the north-west of the concept plan site;
 - c. support the delivery of the main street and junction connections within the site
- The document

sets out the following draft charges for development within the allocation:

Standard Transportation Contribution – Housing	£3,425 per open market dwelling
Standard Transportation Contribution – Non-residential	£2,635 per new peak hour vehicle trip

Strategic on-site Highway Infrastructure Contribution	TBC per dwelling
Standard Green Infrastructure Contribution	£1,122 per dwelling
Strategic Open Space Land Contribution	TBC per dwelling
Employment Land contribution	TBC
Standard Education Contribution	£2,736 per 2+ bed market dwelling
Education Land Contribution	TBC
Standard Health Contribution	£672 per dwelling

It is difficult for us to comment in detail on these proposed Section 106 figures in the absence of any viability information or justification for how these figures have been arrived at. Our initial comment would be that the proposed Section 106 figures seem high and that these must be subject to appropriate testing and off set against other on site specific infrastructure provision for each application that comes forward.

It is essential that the Section 106 requirements do not impact on the delivery and viability of sites within the allocation, as this would conflict with the Local Plan and Site Allocations DPD, and the requirement to deliver the 1,000 home allocation. The viability / Section 106 evidence base needs to be consulted on before the plan is progressed further – it is essential that the development industry has the opportunity to comment and feed into this as it the requirements could have significant implications on the delivery of sites within the allocation and in turn on Cornwall Council’s housing land supply position. In addition, some of the figures are still ‘TBC’ and these need to be provided and consulted on.

We trust that the above comments are helpful and would welcome the opportunity for further discussion on our proposals

and how they can contribute positively to the delivery of the Hayle Concept Plan Summary Document.

St Erth Parish Council recognises the need to provide suitable traffic solutions based on the future needs related to the delivery of the Hayle Concept Plan and taking account of existing traffic issues. The A30 from Camborne to Penzance already has significant capacity problems, particularly at peak times which will need to be addressed in conjunction with development in the Hayle and surrounding areas. Whilst accepting the need to provide solutions to existing and future traffic issues, careful consideration will need to be given to any new junctions on the A30 (e.g. at Tolroy) and the potential impact on the surrounding areas (e.g. St Erth roundabout and St Erth Village).

Whilst St Erth Parish Council welcomes the development of appropriate educational provision to meet the future needs of the area, there are naturally concerns relating to any impact on St Erth School (e.g. lack of capacity at the new provision or over capacity based on demographic trends).

The environmental aims of the Plan are positive and it is hoped that they can be delivered.

Hayle growth area concept plan

Thank you for the consultation on the Hayle Concept Development Plan. The summary and technical documents present a well considered set of principals that take into account key risks associated with climate change, flood risk, biodiversity net-gain and green infrastructure. To build on this we have the following comments to support this document and subsequent development.:

- Climate Change, Surface Water Management Plan (SWMP) and Drainage & Waste Water Management Plans (DWMP).
- Developer contributions – offsite drainage
- Upslope offsite flood risk to the development
- Millpool public realm improvement and flood risk reduction

Climate Change, Surface Water Management Plan (SWMP) and Drainage & Waste Water Management Plans (DWMP).

Hayle is identified as a Critical Drainage Area and is identified as one of Cornwall's priority towns for a Surface Water Management Plan.

[https://www.cornwall.gov.uk/media/16936421/hayle-cda-](https://www.cornwall.gov.uk/media/16936421/hayle-cda-2015.pdf#:~:text=Critical%20Drainage%20Area%20%28CDA%29%20Cornwall%20%E2%80%93%20Hayle.%20Catchment,through%20Cornwall%20Council%E2%80%99s%20Local%20Flood%20Risk%20Management%20Strategy)

[2015.pdf#:~:text=Critical%20Drainage%20Area%20%28CDA%29%20Cornwall%20%E2%80%93%20Hayle.%20Catchment,through%20Cornwall%20Council%E2%80%99s%20Local%20Flood%20Risk%20Management%20Strategy](https://www.cornwall.gov.uk/media/16936421/hayle-cda-2015.pdf#:~:text=Critical%20Drainage%20Area%20%28CDA%29%20Cornwall%20%E2%80%93%20Hayle.%20Catchment,through%20Cornwall%20Council%E2%80%99s%20Local%20Flood%20Risk%20Management%20Strategy)

The principles set out in the Concept Plan present a good basis for delivery of sustainable drainage for the development on site including "Provide Swales and attenuation ponds based upon SUDS best practice to ensure the new development does not create any flooding issues".

However there have been recent surface water flooding incidents in Hayle, and the impact of climate change increasing the frequency and intensity of rainfall, means that further surface water flooding can be expected. This presents a unique opportunity to improve SW runoff and prevent future events similar to the floods in December 2019, which are avoidable and are likely to increase in the future.

Therefore as identified in the FRMP, CFMP, and CDA guidance ahead of the development a Surface Water Management Plan (SWMP) should be developed to integrate solutions to existing flood risk with new development. With significant growth there is also the potential to integrate the SWMP with work by SWW on the Drainage and Waste Water Management Plan (DWMP). Using this approach the need for foul sewer provision can be reviewed with regard to separation of surface water from the combined sewer, and provision of the appropriate infrastructure to the existing community. This approach has additional benefits of reducing the incidents of sewage discharge from CSO, and can help protect bathing water quality.

Careful planning of exceedance pathways could provide future resilience to flooding for the new development and seek to direct flow towards attenuation ponds and strategically maintained hedgerows

Developer contributions – offsite drainage

At this stage recognising that there may be a requirement for drainage infrastructure should be recognised.

It is noted that as a 'Strategic Site' the development is exempt from CIL, and that S106 agreements will be required, and that this will include a Green Infrastructure contribution, as well as transportation, Education and Health.

While the technical section 5.3.6 on drainage stipulates a set of drainage principals for on site, there may be the need to upgrade offsite drainage to allow discharge from the site to occur without increasing third party.

This could be determined through the SWMP/DWMP, and may be through SWW contribution or through highways improvement.

Through the assessment of the SWMP there may also be a requirement for contribution to upgrade of Environment Agency assets on the Mellanear Stream and at Marsh Lane.

Upslope offsite flood risk to the development - aligned to Local Nature Recovery Strategy

Tree planting within the development is proposed, but no additional woodland appears to be proposed. Development in this area poses an opportunity to implement NFM measures (i.e. further woodland planting) around the Mellanear stream to increase the blue-green corridor, slow runoff flows entering the stream (thereby reducing siltation problems in Millpond) and further support the forest for Cornwall project.

There have also been muddy flooding within this catchment. Therefore as part of the Growth, opportunities should be identified through the LNRS to deliver biodiversity net-gain and habitat improvements on land upstream of the development, that will also provide NFM benefits.

Keeping hedgerows could help improve attenuation also. Ensuring that maintained hedgerows and corners of hedgerows in down sloping areas could help to attenuate runoff in periods of heavy rain.

Millpool public realm improvement and flood risk reduction

Foundry Square is at risk from flooding from the Mellenear Stream, and currently benefits from a flood alleviation scheme from the Millpool to the quay.

Over the years the Millpool has been subject to siltation, and due to historic contamination is costly to desilt. However while this has not reached critical levels, there is a risk that in the future continued siltation may increase downstream flood risk.

The culvert also has limited capacity, and with climate change, the protection this provides and the flood risk will increase. Therefore it may be possible to integrate public realm improvements to the Millpool that will increase its storage capacity to help sustain the protection to Foundry Square, and provide investment into this historic feature.

Any proposed footpath near the Mellenear stream should be set back enough to allow the course of the river to move naturally without the need to install erosion protection measures in the future.

Hayle Causeway

We are pleased to note that future risks to the Causeway are recognised and explicit in this planning exercise, with options being identified for alternative access routes from the A30. In time there will be a need to review the role of the Causeway in flood and coastal risk in the area to determine the long term management approach to this structure.

These representations are submitted on behalf of the Richards family. The Richards family own a significant extent of the total proposed masterplan area and the delivery of this land is crucial to being able to deliver any mixed use scheme within the Site Allocations DPD area. Given the key strategic interest the Richards' land has, it is therefore very surprising that at no stage has there been detailed engagement to discuss the current and potential future use of the site. For clarity, there has been some general discussion about how the overall scheme could be delivered and funded although this has been based on very conceptual type discussions. This clearly undermines the validity of the process to the extent that there is no evidence that the proposed masterplan is deliverable in either ownership or commercial terms.

We would also note that in seeking to deliver the DPD allocation, the discrepancy between that document and the Neighbourhood Development Plan should be addressed. This area (shown shaded red on the attached plan) should be included as residential land within the emerging masterplan in order to deliver a comprehensive scheme.

In order to try and take matters forward in a productive manner our client is willing to engage in meaningful consultation with Hayle Town Council and Cornwall Council. These will need to include a full understanding of commercial and timing implications of any proposal. Responding to four short questions is not seen as a meaningful engagement process. However, for clarity each is answered below and we would welcome the opportunity for meaningful engagement:

Q1. Views on the land uses

The broad mix of uses appears to be in accordance with the uses allocated within the DPD. However, there does not appear to be any evidence to justify the quantum of each use, their deliverability and whether such a mix is commercially viable – particularly given the very onerous (and incomplete) section 106 requirements in addition to the need for new road infrastructure. We would also question whether the employment uses proposed are realistic or commercially deliverable.

It is also not clear if the masterplan has considered the potential to introduce other uses that could be acceptable in planning terms such as tourism / smaller scale retail in order to serve new and existing residents.

Q2. Page 12 Infrastructure

Clearly any new development must be supported by the necessary infrastructure to enable it to function appropriately. As with many masterplan projects, this proposal seems to be entirely design led and there is no evidence to confirm that all of the infrastructure listed is directly needed to service the proposed development or can be funded by the development. There is simply no evidence put forward to make an informed judgement on this point although as a general note it seems highly improbable that a scheme of 600 units could fund or require an entire primary school in addition to all other costs.

Q3. Section 106 Requirements

Firstly, we would note that the table is not even complete and therefore cannot be meaningfully consulted on as a full understanding of development costs is needed to comment. The s106 requirements are generally the standard figures applied by the Council throughout Cornwall and therefore in no way directly relate to the development proposed.

Q4. Any other comments

As set out earlier, the landowners would welcome the chance to work constructively to deliver the broad principles of the DPD allocation. Disappointingly, this masterplan process does nothing to enable either that or the delivery of the allocation.

Further to this, any masterplan cannot purely be a design document but must clearly set out how all partners can work together to deliver a scheme that is viable in commercial terms and deliverable in planning terms. The current draft falls woefully short of this aim.

I wish to object to the Hayle Growth Area Concept Plan for the following reasons:

Hayle has and is experiencing a large amount of housing growth, i.e. North Quay, Riviere Fields, Godrevy Parc, etc.

This has and will lead to a large increase in traffic and a strain on all services which are inadequate at present.

All Hayle residents have experienced the many traffic queues that occur coming into Hayle, through Hayle and around Hayle.

There are two “pinch points” at Loggans Moor roundabout and St.Erth roundabout and there seems to be little that can be done about this.

To propose a roundabout in the middle of Hayle bypass will only exacerbate this problem.

Will this increase traffic through the “pinch points” along Guildford Road; i.e.the Railway Viaduct towards the top of Guildford Road and the “Give Way to oncoming traffic” at the bottom of Guildford Road near the mini-roundabout at Lidl.

Is it time to consider alternatives to increasing housing in a town which is already heavily congested?

There is much to commend in this work that will have such a significant affect on Hayle and to that end we broadly welcome the work within the Hayle Concept Plan. We do, however, wish to continue to push the Council and partners to ensure good design is achieved. It is key to be able to ensure development will conserve and enhance the significance of historic places and the setting of heritage assets including, but not exclusively Town of Hayle itself as a World Heritage Site.

Development should seek to promote character in townscape and landscape by responding to and reinforcing locally distinctive patterns of development, local man-made and natural heritage and culture, while not preventing or discouraging appropriate innovation.

The successful integration of all forms of new development with their surrounding context is an important design objective, irrespective of whether a site lies on the urban fringe as this does, or at the heart of Hayle town centre.

In these regards we do get a sense that the plan does consider the land form and that this has been taken into account. Natural features and local heritage resources do appear to help give shape to a development and integrate it into the wider area, reinforce and sustain local distinctiveness, reduce its impact on nature and contribute to a sense of place.

There are, nonetheless, a few issues we wish to raise and the consultation poses a number of questions in which we try to pick these up:

Q1. Do you have any views on the different uses and layout of development shown in the Concept Plan?

We welcome the statement of intent and the aspiration for the creation of the Main Street and neighbourhood shopping. “The main street could become a “ linear “ neighbourhood centre including local facilities like a local shop such as café, offices, hairdressers etc focussed on the busiest section of the street. This would be a similar concept to Copperhouse but would not be a competing offer.”

There are, however, a few concerns regarding the statement and implementation. It would be important to ensure that this new neighbourhood does not compete with the core of Hayle as a retail centre. A lot of work and investment has gone into rebuilding the vitality and vibrancy Hayle and it would be a shame to undermine this now by the accidental creation of competing retail uses or the unfortunate creation of an out of town car led retail centre. The question we would ask the Council is how would this plan ensure that when the statement 'will' be delivered?

A significant impact on this is the highway infrastructure and how it relates to the neighbourhood centre and the A30.

Option 2 appears to be very infrastructure heavy and crosses the A30, potentially creating a precedent of development to the south of the A30. Option 1 appears to be a softer approach. It would, however, be important to ensure that the use of HGVs and their impacts are not detrimental to the creation of a place in the main street and neighbourhood. It is not to say that these things are mutually exclusive but sensitive highway design led by other road uses other than vehicular are as important to create a place for living.

Q2. Are there any comments you would like to make regarding the infrastructure highlighted on page 12 within the Concept Plan area?

We broadly welcome the infrastructure and its need to help create a place. Importantly we are seeking to ensure that it is a urban design place making led response rather than transport solutions and new retail dictating the form of the place. The design should be aimed at securing high quality design for places, buildings and spaces that have a uniquely Cornish Character, including its particular landscape setting.

Q3. Do you have any views on the S106 financial contributions required by the development highlighted on page 22?

The NPPF requires that local authorities set out in their Local Plan, a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. Development specific planning obligations and S106 will offer opportunities for funding improvements to and the mitigation of adverse impacts on the historic environment, such as archaeological investigations, access and interpretation, and the repair and reuse of buildings or other heritage assets.

It should be recognised that successful development may be dependent on historic places/spaces to provide the essential character, the social infrastructure, culture, community focus, amenity, recreation or leisure opportunities required to ensure thriving sustainable communities. Due to the increased demands on these heritage assets from new development, how might the S106 contribute to their upkeep and condition? For example, two scheduled monuments are important in the landscape at the west end of Hayle. In addition to their heritage value, they form important amenity and green infrastructure spaces which will be impacted by these proposals. These are the millpond / ropeworks complex <https://historicengland.org.uk/listing/the-list/list-entry/1402648> and the hillfort etc at Carnsew <https://historicengland.org.uk/listing/the-list/list-entry/1006720> .

The Millpond was removed from the Heritage At Risk register last year following work funded by Cornwall Council's Making Space for Nature (Green Infrastructure for Growth) project and the hillfort was also removed a year ago, following conservation of the inscribed stone which formed an important aspect of the site. However, both remain vulnerable, the Millpond especially so.

The work at the millpond complex involved scrub clearance, buildings stabilisation, interpretation and some community engagement. There remains, however, the significant need for a management plan to ensure that the site does not simply slip back into the poor condition that it was recently rescued from. Hayle Town Council has an aspiration to clear silt from the pond and a similar approach would also be extremely beneficial for the Carnsew site. It would help guide the Town Council's management with better understanding and interpretation.

At the opposite end of the town is the Black Bridge, a very distinctive structure built of copper slag blocks from the local Copperhouse smelting works. https://www.heritagegateway.org.uk/Gateway/Results_Single.aspx?uid=1143687&resourceID=5

Its condition has been a concern for some time and work is not still needed to stabilise the site. The canal lock gates nearby, part of the grade II LB Copperhouse Dock, are in very poor condition as are the quay walls in places.

https://www.heritagegateway.org.uk/Gateway/Results_Single.aspx?uid=1327613&resourceID=5

Vacant or underused heritage assets not only fail to make a full contribution to the Borough's economy but they also give rise to negative perceptions about an area. This, in turn, can detract from its attractiveness to visitors and inward investment. Consequently, we would envisage these assets benefiting from S106 as they will be a direct impact of the scheme on some of these assets and benefit to the users of the new housing in terms of green infrastructure.

I have just one question regarding the proposed building of 600 new homes in Hayle. Where do you get the information that 600 homes are needed - who are the houses intended for?

I am writing in response to the Hayle Masterplan and outline my comments as follows :

Density

The density of housing is too high for the size of the allocated area and this will significantly compromise the quality of the overall development.

The Hayle Masterplan intends to create 1000 new homes, yet the background to the plan states " To meet housing demand and population changes, around 600 new homes are required to be built in Hayle between now and the year 2030 "

Design

The design premise should not reflect the industrial heritage of Hayle, but the characteristics of the green field site on which it will be built and it should incorporate and retain as many key features as possible, such as hedgerows and standard trees.

Given that the build will cause a significant loss and disturbance to existing habitats and species, an increase of only 10% in ecological habitats is not ambitious enough and this target should be much higher. Any green planting cannot replicate what was there before.

Some of the fields are important feeding grounds for the estuary waders, such as Curlew and Oyster Catchers and the loss of this habitat could affect the viability of these species in the Hayle estuary.

Open Space

I welcome the creation of green infrastructure that supports biodiversity and active lifestyles, the provision of allotments and a community orchard, but would like to see the green open spaces more evenly distributed throughout the development and not concentrated towards the lower end of the development.

Open space is no substitute for private gardens, which offer families a sense of well being and a secure outdoor space for children.

Also, I agree with Devon and Cornwall Constubulary comment that the play areas for younger children should be located closer to dwellings for greater overlooking.

Housing

Given that Cornwall Council has declared a Climate Emergency, I expect that the housing will be built to the highest passive haus standard, with maximum insulation, ground source heat pumps and P.V panels where appropriate.

To enable the development to be as carbon neutral as possible, gas installation should not be permitted.

Houses should be provided with electric car charging points.

A proportion of houses should be allocated as truly affordable rented social housing for local need.

There is also a demand for accessible bungalows for the elderly, with outdoor space.

Access

The A30 behind the development regularly gridlocks in summer and traffic backs up to the roundabouts at each end. A new roundabout junction onto the A30 would cause further traffic congestion and Option 2: Tolroy flyover is the only feasible option.

Air and Noise Pollution

There is a concern about the close proximity of housing to the A30 and the exposure to excessive air and noise pollution.

I suggest that an Air Quality Assessment is required to ensure that public health is protected.

Noise pollution may be reduced by the planting of a wide belt of trees adjacent to the A30, which would also contribute to the Forest of Cornwall Project.

New Infrastructure and Services

I suggest that a development of this scale should provide the following services GP surgery Dentist Large scale community hall, Community Outreach Centre/Hub

I hope that these comments are useful

In response to the consultation of the Hayle Masterplan my initial thoughts that your not really listening to the concerns of the local community that have taken the effort to respond to the first consultation, much more work will have to be done to properly engage the wider community to get this scheme acceptable. It seems that just working with statutory bodies like the Town Council surely isn't consulting with enough of the community.

This project should be in line with Cornwall Councils declaration of Carbon Neutral by 2030 and with nature/biodiversity and the natural environment at its heart.

Yet another complex documentation which the ordinary member of the public will either find too difficult to navigate or more likely ignore.

Its does represent a complete failure by officers to see that this is a satellite development hasn't got the industrial heritage of Copperhouse and Hayle, it an open green field site and is rural and agricultural and will, if not designed properly have a fundamental impact on those who will live here.

THE A30 !!!

The Hayle bypass, the A30 is one of the key elements and one of the most important aspects to this project, having experienced gridlock on more than one occasion through Copperhouse/Hayle/High Lanes and on the A30 itself, any suggestion that another

roundabout (option 1) is located on the bypass to access the development and road to Helston is ludicrous and that option 2 is the only logical and sensible proposal. The A30/Hayle bypass needs to be removed both physical and emotionally from the development and that a greater effort has to be made to shield any housing from noise and pollution.

But are you creating another rat-run to avoid the A30!!

People will need to live here and noise and air pollution isn't beneficial to mental health or well being - architects/planners and developers aren't going to live here, so better pre- planning to avoid the effects of the A30 will be needed.

Clean Air for Cornwall strategy.....March 2017

"7 Planning and Air Quality: Guidance for Developers 7.1 How can Planning help improve air quality?

Land-use planning can play a critical role in improving local air quality. At the strategic level, spatial planning can provide for more sustainable transport links between the home, workplace, educational, retail and leisure facilities, and identify appropriate locations for potentially polluting industrial development. For an individual development proposal, there may be associated emissions from transport or combustion processes providing heat and power.

Although many individual developments may be small and have a minimal impact on traffic volumes and local air quality, cumulatively this level of development will inevitably increase road congestion and have an associated impact on air quality.

The impacts of development proposals on air quality must be taken into account and Cornwall Council will seek to ensure that new developments do not exacerbate air quality problems in existing and potential AQMAs, or create new problems elsewhere. Policies which reduce the need to travel and encourage access by non-car modes should help to reduce air pollution, as well as carbon emissions. Cornwall Council will ensure that air quality is considered when assessing development proposals, particularly in or near AQMAs and where significant doubt arises as to the air quality impact then the precautionary principle should be applied.

All new developments will be expected to take account of the needs of cyclists and pedestrians either by the direct provision or by contribution to new routes or links to existing routes within or adjoining a settlement.

Developments which are likely to have significant transport implications should provide a Travel Plan (TP) demonstrating practical measures for achieving sustainable transport objectives (CC Generic Action 5).

Planning Officers routinely seek comments from Neighbourhoods and Public Protection on various planning applications. This is particularly the case for any proposed development which might have an impact on existing air quality within or adjacent to an AQMA or area where concerns about air quality have been raised.”

“Cornwall Council has also prepared a chief Planning Officers Advice Note on air quality²⁷. This advice note is designed to aid interpretation of the Council’s air quality policy and sets out how risk, cumulative impact and mitigation measures will be considered. The advice note highlights that increased risk to health from a proposed development would be unacceptable if measures to mitigate increases in pollutants are not appropriate. On their own AQMAs do not preclude development, however planning decisions are as balance and must reflect the Government’s priority to provide more homes. Therefore an assessment of significance of the impact is required, with mitigation measures agreed where necessary and the impacts weighed up against other material considerations.”

The whole of the road infrastructure/network around Hayle and through Copperhouse/ Hayle and beyond needs a major review, the potential knock on effects of the development could be catastrophic if not planned properly.

What’s needed is local ‘affordable socially rented’ properties and not high end investment opportunities for the out of county rich or the commuters to Penzance, St Ives or Truro. Again it needs 30% affordable pepper-potted throughout the development and not pushed into a corner potentially creating a ghetto.

I was deeply shocked to read that there are 17,00 holiday lets in this area!

Local people on low incomes are forced to take what they are given but this is an opportunity to change this and make something unique and a place where people want to live, how you build community isn’t to ask officers its to find out and engage with your community and that means a greater effort than you’ve shown so far.

There too many houses in this scheme and not enough green space which would help bind a new community together. We can already see in existing new developments in Hayle a desertification of community by the overwhelming sense of building

claustrophobia due to a lack of green space/gardens etc Greenways and play areas should be pepper-potted throughout the scheme with cycleways/green-linkways and not to be shunted away into a corner of the development.

Nature should be central to this scheme which gives residents a feeling of belonging to a place otherwise it becomes a dormitory an out-layer and rapidly dead. Please can we have more than 10% net gain for biodiversity.

To market these developments with the Hayle beach and the Towans SSSI as accessible green space again seems illogical and of course is the easiest thing to say " Cornwall's green space are the beaches and coastal fringe " ie lets build high density and let people access somewhere else for green space ! there definitely needs to have green space within our communities. After all this development is on a green field site and does have nature already here, like wintering feeding grounds for waders from the Hayle estuary like Oystercatchers and Curlews.

CV 19 has shown us that gardens and growing our own food has benefits for mental health and concrete back yards are no substitute for our own green space. Allotments are community hubs and on a small scale should be pepper-potted throughout the development.

All housing should be built to 'Passive' standards and a Community energy scheme needs to underpin any development. Whether that's wind,solar or PVs or a combination of all three. There should be no gas in this scheme and ground source heat pumps should be the main way of heating.

This a fantastic opportunity to build an eco- village and design a resilient community with well thought out green links to the main community's of Hayle/Copperhouse.

How retail can fit into this proposal, I'm at a loss to think of a successful similar scheme and the big retail in Hayle ie ASDA will also be able to undercut and kill off anything provided.

The lack of a good secondary School and only one doctors surgery's in Hayle is another worrying issue which is why 1,000 homes seems to be far too ambitious and 600 houses seems more realistic. I personally wouldn't want to send my children to a school adjacent to the A30.

A better solution would be to build a brand new primary school purpose built behind the existing Penpool school with its own forest school facilities and importantly away from the A30. This could involve developing the old school into a community hub and possibility of having an outreach from the Doctors surgery at Bodriggy.

I have viewed the documents relating to the Hayle Growth Area Concept plan and have a few comments.

I think there are a lot of positive ideas that would benefit the residents such as the additional road junction on the A30 to Helston which would help relieve traffic through the main town, an additional school to cater for the additional 1500+ houses already planned for the town and the protection offered to Green area around Penpol School.

However there are also many negatives such as the loss of so much greenbelt farming land next to the A30, the creation of what can only be described as a new town/district on top of all the houses along High Lanes and the quay, the extra pressure that will be put on the sewerage system which already struggles and often has to be supported by Clearflow tankers pumping out the drains, by building so many houses and increasing the population of the town so much it will alter the character of the town from a small, friendly, established, historic community to one where there is no 'community feeling' loyalty, caring nature.

Residents feel bullied or brow beaten into agreeing to this because 'there is a need for social housing'. This consultation feels more like a 'tick box' exercise rather than a genuine request for opinions. It seems like it will go ahead regardless of what Hayle residents think. It is more a case of making the best of a bad deal.

Hi , thank you for the chance to comment.

- 1) Please don't make people use pebbledash. It is not attractive and does not replicate granite. There is no design value in imposing this dreadful design rule on us. Design and planning needs to move on from this , it may be the right thing in theory based on a knowledge of planning but in practice it looks awful. Don't spoil out town by imposing it any longer
- 2) Very glad to see that parks have been considered , I think you need a couple more green spaces where kids can kick a ball around. Every child should be able to walk safely to a play space near their home.
- 3) Is it possible to include a circular cycle route around the town away from roads that would encourage safe exercise
- 4) Could we include a BMX track or similar to match the skate park, older kids need something to do. The MUGA is great as well and another informal use as you wish which doesn't need a group such as a bike track would make it brilliant.
- 5) Water Lane would need to be upgraded if junction at Tolroy
- 6) World heritage site must be protected , any building round Penpol must be inline with WHS.

Overall I think it looks good

Thank you for consulting Sport England on the above named document. We commented on an earlier version.

Sport England is the Government agency responsible for delivering the Government's sporting objectives. Maximising the investment into sport and recreation through the land use planning system is one of our priorities. You will also be aware that Sport England is a statutory consultee on planning applications affecting playing fields.

The new Sport England Strategy 'Towards An Active Nation' (2016-21) identifies key changes in the delivery of the strategy:

- Tackle inactivity: more money and resources
- Invest in children and young people to build positive attitudes to sport and activity
- Help those currently active to carry on, but at a lower cost to the public purse
- Put customers at the heart of what we do/be welcoming and inclusive
- Help sport to keep pace with the digital expectations of customers
- Encourage stronger local collaboration to deliver a joined up experience for customers
- Working with a wide range of partners, using our expertise and investment to align
- Applying behaviour change principles to encourage innovation to share best practice

Sport England has assessed this consultation in the light of Sport England's Planning for Sport: Forward Planning guidance <https://www.sportengland.org/facilities-and-planning/planning-for-sport>

The overall thrust of the statement is that a planned approach to the provision of facilities and opportunities for sport is necessary, new sports facilities should be fit for purpose, and they should be available for community sport. To achieve this, our objectives are to:

PROTECT sports facilities from loss as a result of redevelopment

ENHANCE existing facilities through improving their quality, accessibility and management

PROVIDE new facilities that are fit for purpose to meet demands for participation now and in the future.

Sport England believes that sport has an important role in modern society and in creating sustainable and healthy communities. Sport and physical activity is high on the Government's national agenda as it cuts across a number of current topics that include health, social inclusion, regeneration and anti social behaviour. The importance of sport should be recognised as a key component of development plans, and not considered in isolation.

The following comments are provided within the context of:

- The National Planning Policy Framework (MHCLG, 2019).
- Sport England's Planning for Sport webpages (2019).

1. Local Plan & Evidence Base

The National Planning Policy Framework (2019) states:

96. Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.

Sport England's view is that, in order to meet the requirements of the National Planning Policy Framework (NPPF), this should include a strategy (supply and demand analysis with qualitative issues included) covering the need for indoor and outdoor sports facilities, including playing pitches.

Playing Pitch Strategy

<http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/playing-pitch-strategy-guidance/>

This guidance document provides a recommended step by step approach to developing and delivering a playing pitch strategy (PPS). It covers both natural and artificial grass pitches. Sport England believes that to ensure there is a good supply of high quality playing pitches and playing fields to meet the sporting needs of local communities, all local authorities should have an up to date PPS. By providing valuable evidence and direction a PPS can be of significant benefit to a wide variety of parties and agendas.

There is no current Playing Pitch Strategy in Cornwall which is a major issue in the planning for pitches for existing and future residents.

Assessing needs and opportunity for sports provision (Indoor and Outdoor)

<http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/assessing-needs-and-opportunities-guidance/>

This guide for sports facilities (built) is complimentary to the PPS. Sport England believes that providing the right facilities in the right place is central to enabling people to play sport and maintain and grow participation. An assessment of need will provide a clear understanding of what is required in an area, providing a sound basis on which to develop policy, and make informed decisions for sports development and investment in facilities.

Again, There is no current Sport Facility Strategy in Cornwall which is a major issue in the planning for sports that do not use pitches including major infrastructure buildings like swimming pools and sports halls.

The evidence base for sport and recreation should directly link into the development of an Infrastructure Funding Statement and / or SPD Development Contributions and / or the Community Infrastructure Levy.

Action – complete the sport and recreation evidence base and devise a strategy for the delivery of sport and recreational land and buildings including playing fields as per the NPPF.

2. Active Design

Sport England along with Public Health England have launched our revised guidance 'Active Design' which we consider has considerable synergy the Plan in relation to increasing cycling opportunities and enhancing the public realm. It may therefore be useful to provide a cross-reference to <http://www.sportengland.org/activedesign> . Sport England believes that being active should be an intrinsic part of everyone's life pattern.

- The guidance is aimed at planners, urban designers, developers and health professionals.
- The guidance looks to support the creation of healthy communities through the land use planning system by encouraging people to be more physically active through their everyday lives.
- The guidance builds on the original Active Designs objectives of Improving Accessibility, Enhancing Amenity and Increasing Awareness (the '3A's), and sets out the Ten Principles of Active Design.
- Then Ten Active Design Principles have been developed to inspire and inform the design and layout of cities, towns, villages, neighbourhoods, buildings, streets and open spaces, to promote sport and physical activity and active lifestyles.
- The guide includes a series of case studies that set out practical real-life examples of the Active Design Principles in action. These case studies are set out to inspire and encourage those engaged in the planning, design and management of our environments to deliver more active and healthier environments.
- The Ten Active Design Principles are aimed at contributing towards the Governments desire for the planning system to promote healthy communities through good urban design.

Sport England would encourage development in Hayle be designed in line with the Active Design principles to secure sustainable design. This could be evidenced by use of the checklist. The developer's checklist (Appendix 1) has been revised and can also be accessed via <http://www.sportengland.org/activedesign>

Additionally we have recently released 2x short animations on what Active Design is and how planning links with health.

<https://www.sportengland.org/facilities-planning/active-design>

or

<https://www.youtube.com/watch?v=mDaVBh1Bs7Y>

https://www.youtube.com/watch?v=oRCJ4JL_LjM

3. Community Use of Education Sites

Making better use of existing resources contributes to sustainable development objectives by reducing the need for additional facilities and the potential loss of scarce resources such as open space. The practice of making school sports facilities available to wider community use is already well established and has been government policy for many years, but there are further opportunities to extend this principle within the education sector through programmes such as Academies and to other privately owned sports facilities, to help meet the growing demand for more and better places for sport in convenient locations.

Sport England promotes the wider use of existing and new sports facilities to serve more than one group of users. Sport England will encourage potential providers to consider opportunities for joint provision and dual use of facilities in appropriate locations.

Sports facilities provided at school sites are an important resource, not just for the school through the delivery of the national curriculum and extra-curricular sport, but potentially for the wider community. There are also direct benefits to young people, particularly in strengthening the links between their involvement in sport during school time and continued participation in their own time. Many children will be more willing to continue in sport if opportunities to participate are offered on the school site in familiar surroundings. Many schools are already well located in terms of access on foot or by public transport to the local community and so greater use of the sports facilities outside normal school hours should not add significantly to the number of trips generated by private car.

There is a free online resource from Sport England (Use Our School) that offers further guidance and information for local authorities and other education providers on how to make the best use of school facilities for the benefit of the local community.

It is especially useful for those who have responsibility within a school for establishing, sustaining and growing community activity on school sites. 'Use Our School' can be accessed here; <http://www.sportengland.org/useourschool>

4. Specific comments on the Masterplan

- Area 10 & 11 – without the evidence as set out in (1) above how do you know what to plan for, what sports, what size, what ancillary facilities, sports lighting? Co-location with other sports / other complementary uses? How will you ensure community access to a 'school site'? In theory this can work, in practice, well, it can be a time consuming challenge.
- What about planning for other sports (non pitch sports)? On-site or s106/CIL to off-site? As set out in (1) above.
- Area 10 + 11 – opportunities here for sport? Perhaps pitch sports or more informal activities?
- Are you designing homes that will help residents to live an active lifestyle? As set out in (2) above.

The Football Foundation on behalf of The FA advise that:

1. 2 x sport pitches sites are to be provided within the concept plan (one linked to a proposed primary school) – Which sports are hoping to be targeted for these pitches?
2. If 2 x sport pitches sites are to be used for football, what pitch sizes are to be proposed (5v5/7v7/9v9/11v11)? – There is currently no playing pitch strategy in place within Cornwall though national and local participation trends are showing growth in mini soccer (5v5/7v7) and U11/U12 youth provision (9v9), though this was pre-covid19. Will Cornwall FA be consulted to support with identifying potential users?
3. Will any ancillary facilities be provided with these 2 x sport pitch sites? If so, what?
4. The pitches allocated as part of the primary school suggests that they will be available for community use - its assumed these will be operated and managed by the school?
5. Who will manage and operate the town park sports pitch site?
6. Hayle Athletic FC (no15) are based within the proposed sports hub have this club be consulted? Will there be any on-site contributions to support the grass pitches and 3G facility at this site, which currently serves the local community?
7. The two sites for pitches are separate within the growth area, would it be better to create one bigger hub site?
8. Hall size and what will it be equipped with?

9. MUGA, on the diagram this is on the east side. Do we require a MUGA on a 3G site? Would this be better at another location?
10. The Football Foundation and Cornwall FA would welcome any opportunity to discuss the finer detail of any proposed football provision as part of this concept plan

The LTA are broadly supportive – this just sits outside where we have identified a gap in indoor provision (Truro/Redruth). So any develop that increases population and justifies improvement in local leisure provision would meet our approval. Dependent on size of the development I would think another set of courts with gate access system is justified – only private members clubs in that area. The LTA would like to understand how to start a strategic conversation about an indoor facility in this area.

The ECB advise that

- Hayle CC is a large club that is growing and undertakes a number of ECB initiatives. The club use Leedstown CC as/when required to support adult matches so some 'off site' support at Hayle CC to provide a non-turf pitch and improve the pavilion would we welcome.
- Noting the comments regarding 'dual use pitches' cricket would support the provision of a non-turf pitch on site for summer cricket league and social use.
- Sports Hall – the comments in this regard are welcomed and supported within the proposed Primary School. Located as it is, Hayle would be an ideal location for indoor cricket nets to provide indoor training for local clubs and thus negate the need for travelling either to Penzance or Truro.

Thank you on behalf of Devon and Cornwall Police for the opportunity to comment further on these Concept plans. My comments apply equally to both plans

I note and welcome the inclusion of the references to designing out crime within the documents particularly the key principles checklist of the Summary Document

I also note the comment "*Consideration given to the masterplan layout and referencing designing out crime in the next draft of the Masterplan*" in the consultation report which I obviously hope is implemented. Clearly detailed guidance is very important,

for example I note that parking within “small courtyards” is advised as part of the parking strategy but no further information is given. Poorly designed/located courtyards even if small can often be problematic

I would also suggest that under General Guidance Documents within the Summary Document that “All schemes should take into account the guidance and principles Of Secured By Design (SBD is the National Police crime prevention initiative)” is added with a link to the SBD website www.securedbydesign.com.

There are specific design guides covering security considerations for Homes. Commercial developments and Schools amongst others

Thank you for the opportunity to comment on the Hayle Growth Area Concept Plan.

We are not land use specialists and note the reference and adherence to a number of published guidance documents including from Sport England which provides some confidence in the way the plan has been approached.

In terms of sports facilities we believe that the creation of hub sites where possible is a good idea as it provides a focal point for sports activity in the town. Location of facilities on school sites in general helps maximise the use of facilities, makes best use of resources and therefore aids sustainability.

The community pitches and changing facilities proposed to the west of the town, are likely to present a management challenge as they are distant from other facilities. If the intention for this site is for organised sport as opposed to casual play, then location with the school facilities will likely provide better management and booking of the facilities as well as closer supervision. With organised teams the issue of location is not as critical to locality as informal space and the distance of approx. 1km we do not think would be detrimental to any opportunity to play organised sport. To the contrary playing at a well managed and cared for facility can significantly enhance the sporting experience, usually resulting in better maintained facilities, free from casual play, dog walking issues etc. The ability to maintain the facility is made much easier through being part of a hub site. It will be important that the intention for community use is clear and enshrined in policy relating to the operation of the school and its facilities.

The provision of play areas is noted. Our observation on these is that they often lack good play value for the intended recipients. The installation of off the shelf equipment can result in low play value and high ongoing maintenance costs. A creative approach to the play facilities should apply as much as it does to other aspects of the proposed developments.

Just some feedback on the document.

In general, I have no objection to the proposals, as Hayle has needed investment for decades, although we have to be sensitive to local people already living in the town.

Therefore feedback I have;

- Road connections, especially the A30. Currently from Camborne down to Penzance, not really fit for purpose, especially in the Summer. I would favour a slip road at Tolroy, rather than a roundabout - I fear that with even more housing the roads will become busier, and side roads, rat runs, and villages on the outskirts become even more congested. I live in Angarrack and if the A30 is shut, or an accident (happens often as roads are far too busy), these roads become too much to handle for a large volume of traffic.

The A30 should be upgraded from Camborne (to Penzance in my opinion) with as few roundabouts as possible to encourage the smooth flow of traffic

- Absolutely there should be further provision for the Surgery - currently in the wrong place, and causing significant vehicle traffic in a residential area

- Can there be increased use of local builders and trades people in the development of new housing? All too often locals feel that this sort of thing is forced on them by those outside the area, and if they had more 'skin in the game' they may buy in more. Rather than large building companies coming in developing, and all the money gets sucked back out of the area

In light of the new white paper Aug 2020 "Planning for the Future" it would appear that the proposed concept plan and new white paper contradict each other specifically in relation to developer contributions. As such it would appear prudent to request that the process of adoption of this Hayle Concept Plan is put on hold and or revised in light of the government announcement today.

As such Progress land would wish to make a representation formally requesting that the process for the Hayle concept plan is formally put on hold until the adoption of the new white paper "Planning for the Future" Aug 2020.

I'd like to add my comments into the consultation regarding the Hayle concept plan

1. creation of a new high street - Hayle already has two distinct high streets, one at Foundry and one at Copperhouse. having two high street areas is already difficult for the town. Neither has sufficient parking, they are both too far away for less able people to walk in between, and as such they dilute each other. People choose either one end or the other to shop at. Having a third high street, again at a considerable distance (and up-hill) will further dilute the offer and make trading conditions more difficult for retailers. I would like to know that you have considered this and how you plan to mitigate against issues that might arise? (sustainable ways to navigate the town would be welcome)
2. I have big concerns about the planned sporting facilities being sited at the two far sides of the town, and associated with/ linked to two primary schools (one of which, the new one, will be only single form entry and significantly smaller than existing primary schools). Children who attend the central school, Bodriggy Academy, will not be able to benefit from these new facilities as easily as pupils at Penpol and the new school and that is not fair on them. Additionally I think it is crazy to put brand new, quality sporting facilities next to a primary school rather than a secondary school where children are at a more advanced level of sport and arguably need the better facilities. Health of our teenagers is a huge issue, and facilities should be focussed towards building healthy habits as they grow into young adults. Again, to have facilities on the edge of town, where they cannot easily access them seems to discriminate against them.
3. I also think that having schools manage sporting facilities is not the best idea. It puts more pressure on them to deliver services that are not core to them. Quality sporting facilities should be managed by a Sports provider. Covid-19 has laid bare how important it is to concentrate on your core offer - I imagine a number of community sports provisions that sit

within schools will be much more hesitant to open to the public as they don't have the bandwidth to re-organise their facilities within the guidelines, whilst also trying to manage their education provision.

4. How will you managed increased traffic from main road through hayle/Commercial street area to the new developments. Roads that go that way are already very thin, and there is very little traffic calming - particularly under the railway bridges (BodriggyStreet/Queensway in particular)
5. Could I ask how you intend to ensure that Hayle remains a cohesive town, given the size of the expansion?
6. Reports in the local press would suggest that planning has already been granted in areas that are outlined in this plan (and house-builders are waiting to move in) - how can that be, when the consultation process has not yet finished? I'm not sure what the point of a consultation process is if a decision has already been made. It would be a shame if this was just a box-ticking exercise rather than true consultation!

We can find no mention of health provision within the masterplan.

Current General Practice provision in Hayle is at capacity, having added a temporary modular building to create more space in 2005, which is now in disrepair and beyond its predicted useable lifetime.

Over 1000 new dwellings, in addition to the hundreds already built or planned, will require a massive expansion of healthcare provision.

Given the lack of space to expand at the current site, this will require a new site, with attendant costs. It is vital therefore that the masterplan acknowledges this, and it is vital that adequate section 106 monies for health are provided to contribute towards the new building that will be required by this very signifcant expansion. No planning should be granted without this proviso.

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.

Natural England previously advised that the Plan should contain specific reference to biodiversity net gain and that any additional habitat requirements should be calculated using the Defra Biodiversity Metric 2.0 and mapped on the Masterplan.

It is noted that the Concept Plan refers to a requirement to achieve a minimum 10% Biodiversity Net Gain but there is still no requirement for the net gain to be calculated using the Defra Metric and indicative additional habitat requirements have not been mapped on the Masterplan. We do understand, though, that comprehensive net gain calculations will be dependent on the more detailed ecological survey information to be provided at the planning application stage. However, there will be some benefit to mapping indicative areas for biodiversity net gain as this would guide developers to provide net gain on-site, which should be given priority over off-site provision.

It is noted that the response to Natural England's previous comment was that "The Building with Nature checklist is being applied to the Masterplan". Whilst this standardised approach to delivering Green Infrastructure is welcomed, it is *not* a replacement for the Defra Biodiversity Metric 2.0 and both could be applied alongside each other.

The Defra metric calculates the value of the lost habitat and calculates the type and quantity of habitat required to achieve a meaningful net gain for biodiversity, taking in to account the value of the new habitat in relation to the habitat lost. It would be advantageous to provisionally calculate the area of habitat needed to achieve net gain at an early stage, this might enable the identification of an appropriate quantity of land at the master-planning stage.

In addition, Cornwall Council have recently adopted a Biodiversity Advice Note that commits them to requiring all major developments to deliver 10% net gain for biodiversity, in accordance with the Defra Metric, and ahead of future mandatory requirements. It is assumed that this requirement will be applicable to the Hayle Growth Area, as a strategic area for growth.

It might be advisable to include

the Advice Note in the list of 'General Guidance Documents' within the Principles Checklist in section 7.0.

Section 4.0 "Vegetation cover and ecology" in the document titled "The Existing Situation" should refer to the proximity of the Hayle Estuary and Carrack Gladden SSSI. The concept plan should also identify the need to ensure drainage provision (SuDs) and sewerage capacity are sufficient to ensure no adverse impact on the Hayle Estuary and Carrack Gladden SSSI.

I wish to make the following comments with regards to the above plan:

1. Extra Primary School - where is the provision/capacity for those pupils to move to Secondary Education?
2. The new Primary School needs to be sited near new housing to negate the need for children to be driven to school.
3. Extra housing at the Mellanear Road site will increase the traffic using Mellanear Road - a narrow, winding road which is fronted by a hospital and a hospice.
4. Extra traffic using Mellanear Road will cause traffic jams in Foundry Square, owing to the traffic lights at ASDA and particularly in the tourist season.
5. There is no provision for extra Doctors Surgeries, given that Hayle does not have enough GP provision now. Extra Dental Surgeries will also be needed.
6. Housing (if built) must be only available to buy or rent by local Cornish people. New houses must NOT be bought by 2nd home/holiday let owners. It is obvious that the current development at North Quay will be priced out of the reach of local people and that the development will be left empty for much of the year, due to it being bought by 2nd home owners from up country. Any new development MUST be for the benefit of Hayle residents and businesses.

7. Given that the town centre and A30 had severe flooding in 2019, what will the impact be of concreting over vast swathes of agricultural land when houses are built on a hillside?

I trust you will find these are legitimate concerns and that they will be given due consideration.

New development Hayle 600 home plus school

Any chance the houses could be built by local building companies? Cornwall are very quick to add conditions to who can buy them but when it comes to building new homes the local builder never gets a look in on design/ building or land purchase.

I'd like to see a condition added that 20% of new homes on sites larger than 100 homes will be offered to smaller local builders to build. Stop the big house builders cleaning up in our small towns and cities taking the money and leaving. Share the wealth in our communities.

Concept of a new condition based on local e-commerce you could be the first to pioneering council to change the way planning permission is sought with the small to medium size "local" builder in mind. (I'm positive the main contractor will try and push the 20% of houses to be the most awkward part of the site). So a specialist condition outlining and detailing a fair level of "out the ground costs" will be apportioned by both parties 50%50. Ie retaining walls, roads sewers lighting etc. If the council support this condition.

I believe as much house building profits should be kept in the community and limiting money taken away from the cornish pound.

We need to start thinking about our locals not just in housing needs but work. This could allow hard working people in the industry to grow their businesses employ local men and keep them employed.

Bring back the old days when cornwall had pockets of builders around the county, building many new houses and developments and lived in the community.

I hope I've given some thought how much your community needs the work more than worker travelling into county for it.

I have recently visited Hayle and was totally blown away by the redevelopment of Hayle Harbour. Hayle is a beautiful place and I believe it was in need of the upgrade well done it's looking amazing !!

My comment is that greenfield sites should not be built on if at all possible.

Greenfield sites should be built on only in exceptional circumstances and any such building should be limited.

Once built on, those green fields are likely lost forever.

House building targets must be scrapped.

Cornwall is becoming over developed, which is a great shame. If this continues unabated then will be much regret in future years. Cornwall will lose it's soul, identity and beauty as a result.

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, so it can reach homes and businesses. 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. 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.

Response

We have reviewed the above document and can confirm that National Grid has no comments to make in response to this consultation.

Having studied the area covered by the plan we can inform you that the residents in the Copperhouse Area are not happy about it after the flooding and do not want any more buildings in that area.

The whole area is a flood plain full of springs, underground streams and mine drainage. It is in fact a marine delta which drains into the river which runs under St. George's Road and has other outlets into Copperhouse Pool via Angarrack. (Luke's Farm)

We have the Land Register for that whole area and this land is recommended for stock grazing, small vegetable plots and fruit trees. Buildings are not and this also applies to the whole area around Neitherliegh Ventonleague, Loggans and High Lanes which has had problems with sewage disposal for years which resulted in a tanker disposal system.

Hayle and Penwith fought the original plan in the 1990s and it was taken off the Local Plan at the time. It went back on after Penwith was no longer a District and you know what problems we have up there now.

This Plan should not even be considered but money comes before Common Sense. The town (Copperhouse) and its people have rights too. The Archive feels that it should make a comment on this plan and the impending disaster before it is forced on us.

We wish to raise our concerns on the Hayle Concept Plan which in the future will effect the area at the rear of our property

The fields at the rear of our property have always been used for horticultural purposes.
The valley below has always been a haven for wildlife and corridor for many migrating birds.

Your plan for the area at the immediate rear of our property shows a green trees area which comes up to our boundary wall and we would like this to be kept in place when any future planning is granted.

The established wildlife will need consideration before and after any building work is to commence.

Having read through the Story Map, there are two main concerns that I have:

1. Provisions for new health facilities. The current surgery is over subscribed and a new health park/surgery will be needed when all of the new homes are occupied. Although this is mentioned in the plan, it doesn't seem to have a lot of detail, and I am concerned that it will be forgotten about when the plan comes to fruition. An example of this already happening is the bridge that was supposed to be built over Penpol Creek when Asda was built on South Quay. This has still not been done.

2. Indoor sport facilities - i. e. a leisure centre with a swimming pool, gym, sports hall , etc. Outdoor sports spaces and green spaces are included in the plan, but a town this size needs its own facilities for all sections of the community. I am retired and usually travel to St. Ives 3 or 4 times a week to the leisure centre, but the younger people of the town also need sports clubs, and a range of facilities and opportunities.

Thank you for the Hayle growth area concept plan, when I came to one of your plan exhibitions I asked about extra health surgeries, I was assured there would be more provided, but I can't find any on the plan.

I also asked about schools and was told yes there would be more,well there is an allocated area for a new primary school, are you not expecting those children to grow up and need a secondary school?

On the key to the plan there is a striped white with blue box for positive employment frontage along the road, but it doesnt show this on the actual plan. I do hope it is actually going to be there.

There is no mention about all the building along North Quay and also above that, it looks as though you are going to fill in the whole area between there and the chalet sites is this so? If so what about all the wild life and foot paths that are used a great deal by local people, especially now as the first part of the actual beach has been ruined with all the diggers taking away the sand and just leaving bare cliffs and rubble.

The next thing will be some of the chalets falling into the sea and the council will say its the weather,which will not be the exact truth.

just had a look at the plan for Hayle, what I would like to know is where are the extra police coming from will there be a new police station what about the doctors and hospital Truro been our only hospital what about jobs not every one is a builder or able to work in a office or to be a craft person where will the jobs be for the every day person will all these houses be used for local people or will a lot of them be coming down from up country?will there be any council houses been built for those who can't afford to buy there own homes will they be of a good size and not like the one's that has been built opposite the football club or the prefab ones that are been made on the north quay. What about the banks will they be coming back again or are the rents going to be to high for them not to come back.

I hope you have asked yourselves enough times to make sure this is the sort of place you want your grand children to grow up in with all the problems that go with living in big built up areas with the problems of drugs and gangs coming in.

I do not have any children and too old to start now so I really do hope this is what you want for the next generation because you are the ones that will bring all the problems to Hayle and very little wild life for your children to know and enjoy I know we have homeless but I do think we need all these houses.

I completely OBJECT to the Hayle Growth Area Concept Plan.

Climate Emergency -

How on earth can Cornwall Council declare a Climate Emergency and then take away green space for housing. It is utterly irresponsible. The land that has been highlighted for development enhances its surroundings. Often I have seen wild deer grazing in these fields and the reason tourists visit places as far down in Cornwall as Hayle is due to the small population of the towns to give it the getaway feel - bringing themselves and their families back to nature. Once this land has been built on, there is no going back.

I totally disregard that any 'green infrastructure' is green at all. Yes it is 'greener' perhaps than typical building but all building is detrimental to the environment. The waste is astronomical. The loss of these green sites a travesty.

Transport and Land Use -

During lockdown, myself and my family who live in Hayle were able to get out and about on our bikes. As soon as lockdown was lifted it is hugely clear how unsafe our roads are and we were unable to travel on foot or by bike the distances we were doing before.

It is irresponsible to suggest that you can adequately add enough bike and foot paths when the Hayle paths are not comprehensive enough as they stand and you cannot commute to school or work safely.

Add the extra traffic with all this building and I am afraid that it is just going backwards.

Green infrastructure -

No green infrastructure will be the same as letting green fields lie.

Open space, biodiversity and drainage -

2020 saw a huge flood down the centre of Hayle devastating people's houses and many businesses. The run off was from an unusually high rainfall - whatever arguments that suggest the new buildings didn't add to this situation need investigating

completely. Yes, we are seeing changes in the weather and that is due to CLIMATE CHANGE. How can increasing the amount of concrete and reducing the amount of fields help in the coastal town to avoid such devastating floods in the future. Irresponsible.

Planting forests -

Although a lovely idea on paper to counter the ridiculous amount of green land loss - studies now show that these are ineffective if mis managed and do not hold as much carbon as we would hope. It most certainly does not balance out the loss of this precious green land.

Noise, Mellanear Stream, Penpol School extension -

Currently, the large vehicles that rush down the main road to the roundabout new Penpol school make me worry for my children's safety everyday. The proposals will see an increase in heavy traffic - local and otherwise - and an increase in children using this massively oversubscribed school (without the extra building work). I cannot see how this is a safe and sensible option. The children's lungs will suffer on the commute and the school's ability to provide such great education will diminish due to the nature of the increase in pupil numbers.

Mellanear Stream is not only a part of Hayle's heritage but provides much needed run off from the higher land and is home to an abundance of wildlife. At every rainfall the Millpond is close to bursting (and did infact overflow) and any tinkering with it is foolhardy.

Green infrastructure -

the amount of green infrastructure suggested in this current plan is no more than a buffer to the increase in noise pollution to this wonderful small town. It is woefully inadequate and solely for the developers to complete their minimal obligations to get this development on the way.

How can these 'wildlife corridors' be considered when currently the green roadside areas are constantly sprayed with pesticides and cut back in the Spring time when bees and flowers are in abundance. If management of such areas cannot be managed in an environmentally friendly way currently then there is not hope for the future.

Population of Hayle -

I believe that the people of Hayle would not be at all interested in seeing their town double in size. This is just a council led initiative to tick boxes and raise money without any consideration to the CLIMATE EMERGENCY that they have declared.

CONCLUSION

I honestly believe, that I for one will consider leaving Hayle if this type of growth goes ahead. The town will lose its small town feel, the beaches and green areas will suffer with the increase in population, the noise levels will grow to be intolerable with the increase in traffic.

The Hayle harbour development itself is showing that the increase in people to the area, creates a dangerous number of people around the estuary which itself can be dangerous to those who are not knowledgeable of the dangers. Any restriction of use of the estuary due to this will be detrimental to the current population of water users who are skilled and able to use the river as it is.

I cannot express enough how much myself and my family are against this development.

Regarding public feelings about this huge project, I think that there should be more explanation regarding Health Care services and also education for those older school children. I do think that St Michaels Hospital should be exploited more which it may be with the increase in the local population.

Please excuse my replying directly to you, but as I no longer live in Cornwall I feel I have no specific detailed comments to make concerning the Hayle Growth Area Concept Plan. However, I do have a specific question that I do believe should be investigated to see if it should be pursued as part of the Plan.

I believe that as a country, despite the desperate need for it, we are not taking advantage of our geothermal energy generation opportunities afforded by the large granite outcrops in Cornwall. Various studies over the years have clearly identified the opportunities and although, world wide, the technology is used successfully, in the UK only two small projects, in Cornwall, are being developed.

With Hayle only a few miles away from the high geothermal granite area which encompasses St Ives, Penzance and Lands End and the suitable underlying fault structure, there has to be a massive opportunity to develop a geothermal energy generation site to provide cheap renewable energy for all of South West Cornwall - and by co-ownership of the process and site, also provide a sustainable income to Cornwall Council.

I am writing to voice my dismay at the plans to build on an ever decreasing green site , the rate at which green areas are being built on is alarming in my opinion along with the increase in traffic which hayle struggles with as it is , along with the works on north quay it seems that any free space around hayle is free to the highest bidder , the latest houses around Godrevy Park and high lanes stand out like a sore thumb and ruin the area As someone that appreciates the green spaces it seems not enough is being done around Cornwall to save them and with Boris' s latest words of wisdom about build , build , build ,!! Who knows what's to come !!

Having just read the proposals for Hayle development it concerns me there is still no attempt to address the unacceptable traffic situation on Guildford Road. Whilst the 2 proposed A30 junctions may both have their own individual merit neither will alleviate the strain already encountered on Guildford Road most problematic of which is the constant stream of tractors starting at 3am heading to the power plant at Leedstown. Even after installing double and secondary glazing the sound is deafening and prevents an uninterrupted sleep. Add to this the constant stream of commuters to Helston and back from 7am and the road becomes a death trap waiting to happen. This situation could so easily be alleviated by an A30 junction at Wheal Alfred Road which hasn't even been suggested. Surely if money is available for any junction this would be where it could be used most effectively and with the greatest benefit to the existing residents.

That said the plans otherwise look exciting and beneficial for growth in Hayle moving forward. Sort this one detail and you would have my full support.

Having read the plans for development for south Hayle I have been very impressed with the thought put into it. My main concern is that the infrastructure is put in place before the development starts. We must have new access from the A30, new and bigger doctors surgery and schools built first. Hayle is already gridlocked in the summer and with the new harbour development (which I support) it will only get worse.

Thank you for sending me the various documents on this consultation which I have perused. That does not mean I have read every word. I would be happy if the pdf format you used had a search facility which this seems to lack. Looking at my notes it seems that a lot of my comments refer to things which I do not see in this consultation.

The following are my observations on the information provided.

- 1 It didn't say how many people had been consulted. There were random extracts but nothing to say how many people had made them.
- 2 Statutory consultees of course mostly responded but I only noticed a response from Lostwithiel Town Council, seemingly no other Parish or Town Council responded?
- 3 I see no reference to the representation of the people. If 1 000 more dwellings are to arise then surely more Town Councillors will be needed? What is the formula? I can think of a parish with 2 000 electors and 11 Members so 1 000 extra voters, five extra Cllrs?
- 4 There is a railway station in Hayle. Presumably the new residents will be encouraged to use it? To facilitate this they will need more parking for their cars. The bus route timings need to be linked to the train times as well. Having real time signs showing when the busses will be at point A or B is OK but if the actual busses don't adhere to those timing due to traffic jams..... does it help?
- 5 I see no reference to the proposed tidal energy scheme for Hayle. Will this scheme have any impact on it? I didn't see any response from the RSPB who I know own a significant area adjacent to the proposed tidal energy scheme.

I see no reference to sewage. I visited St Erth sewage works a year or so ago and they were talking then about the pressure on their capacity due to processing sewage from as far away as St Agnes and St Ives. Where is the provision for more sewage capacity in this masterplan? Currently they deliver semi raw sewage 2km out to sea in a pipeline which isn't always successful if the wind and tides are against them. Surely this needs to be addressed?

- 1 Gas is a cheap source of energy compared to electricity (not surprisingly considering a lot of electricity is generated using gas as the fuel so you get losses in combustion and transmission) and cleaner than oil or coal so is mains gas provided for throughout Hayle and the new development? Could more biogas be produced at St Erth sewage works

than is currently produced to provide for the needs of the extra 1 000 dwellings etc?

- 2 An area of agricultural land will be lost. What measures are in place to compensate for that, not just paying the landowner for the land but ensuring that production is not lost? Brexit ahead remember, less cheap food from Europe so produce more at home?
- 3 How is this scheme going to be funded? There is a lot of infrastructure and the only reference to funding I found was that CIL will not apply and that the developers would put Section 106 agreements in place. How efficient are Section 106 agreements? How efficiently are they enforced? If the infrastructure produced requires recurrent expenditure to operate it (schools for instance need teachers etc, surgeries need Doctors and staff) where will that recurrent come from? Has this been considered?
- 4 I see no reference to Affordable Housing. OK the DPD provided the sites and the housing numbers but will they be sufficient to fund the infrastructure? Previous experience has been mixed with the result that market houses increase and affordable reduce. Is this provided against here?
- 5 400 metres between bus stops (aka quarter of a mile in old money) is too far in an urban strip town like Hayle. 200 metres would be better. Perhaps the opposing directions can be staggered? Is there any provision for a town shuttle bus system to keep cars in garages more when people go shopping and to catch the train to work in Truro or beyond? If there is I don't see it.

Perhaps some or all of the missing items are found in the documents if they do the index etc is severely deficient. The impression which I get from the documents is that this is the window dressing the nitty gritty being dealt with elsewhere (perhaps in a planning application). I notice another similar document has arrived from Lostwithiel as well.

Overall the concept of this project looks good, but the question I have for you is that do you have an Access and Inclusive Design Consultant embedded within this project who are independent to the architects?

In light of the recent Flash flooding of the Copperhouse area of Hayle and the extent that the sewage system within Hayle is overloaded because of the over development south of Hayle already..It is not at all advisable to further develop the higher land south of Hayle as per the Hayle town council proposed new plans.

Thanks for the opportunity to support my family living in the lower Copperhouse area of Hayle who suffered in the floods.

Comments relating to the Hayle Growth Area Concept Plan

1. **Congestion:** While the level of development in the Concept Plan is fine in itself, regard does need to be taken in respect of the increasing traffic congestion with the town. This is exacerbated in the summer months with tourists visiting the town. Even without the summer increase, a greater number of heavy goods vehicles using the B-roads to access employment areas and delivering to business within the town, is now having a detrimental impact on both town and its residents. From the Tolroy area, this is the only route to Helston (travelling north to west) meaning that all traffic needs to go along this road, there is no alternative. A packing station halfway along it also generates really heavy traffic.

I feel that the junction option to help alleviate both congestion issues is the one at Tolroy.

2. **Drainage:** The proposed increase of housing and employment space for Hayle raises concerns about the current drainage system. Hayle has a very old, combined network with the treatment works at St Erth almost running at capacity. As the level of development increases, surely there is need to improve/ upgrade the existing drainage system? This could be helped by insisting on developer contributions.
3. **Off-road parking:** The current development taking place in Hayle doesn't seem to be providing any off-road parking for the new houses. It is important that any development coming forward in the concept plan area provides at least one off-road parking space per dwelling.
4. **Healthcare:** The area at Tolroy (marked yellow on the plan) has been considered a possible site for a new hospital with sketches drawn up at the time for a 100-bed hospital. This site close to the main road network, between St Just and Truro could work with the existing St Michael's landlocked hospital site, offering improved healthcare facilities for the residents of West Cornwall, avoiding the lengthy journey to Truro.

Please take my comments into consideration when reviewing the plan.

I have studied your drawing of the above and decided to send a letter explaining my views on the road layout.

It is my belief that the junction should be at Tolroy and not where you have shown it on your plan.

Large vehicles (45ft wagons) will go past a new housing estate to get onto the A30, my idea would half that. Also the B3302 from Helston and Leedstown; cars would not be bothered to turn back to get on to the A30, but would go down lanes instead.

If the causeway gets damaged by the sea, cars would wind through St Erth. My drawing would alleviate this problem to some degree and would be a better prospect for the future. P.S. in my opinion the causeway should be closed to traffic as it is a nature reserve.

It is also very important for the road infrastructure to be built before constructing the houses, otherwise the cost of the road could not be met with the Council's budget.

Finally 'Water Lane' is getting very busy, noisy and dangerous, so in my opinion Tolroy is the most practical choice of junction.

You refer to 'the emerging climate change policy agenda'. Bad science, which has been twisted into an ideology, is an extremely poor guide to public policy. There is no unique fingerprint of anthropogenic global warming. Satellite instruments provide our only truly global source of temperature information. The energy balance of the Earth is determined by only 2 energy flows: the rate at which solar energy is absorbed, and the rate at which infrared energy is lost to outer space.

Will all plans for building new houses take into account the following:

- a) The danger of rain run-off causing severe flooding?
- b) The requirement for each house to have its dedicated parking space?
- c) The need for commensurate increase in health facilities?
- d) The need for commensurate increase in educational facilities?

To sum up: There is a need, both for joined-up thinking and planning, and for any plans to cope with climate change to be scientifically soundly based.