

## Neighbourhood Planning CC Officer Consultation Response

Cornwall Council Response	
Neighbourhood Development Plan Proposal	Tywardreath and Par
Consultation documents	Tywardreath and Par pre submission draft neighbourhood plan
Consultation Start Date	10/12/2019
Consultation End Date	10/01/2020
Cornwall Council Team	Response Date
Affordable Housing	31.12.19 – Julia Lansdowne and Stephen Horscroft
Development Management	No response
Development Management – Area Team	No response
Economic Development	No response
Education Infrastructure	No response
Environment Service - Ecology	15.01.2020 – Bruce Forrest ( <i>extension agreed</i> )
Environment Service – Flood and Coastal Environment Officer	10.01.2020 - Dionne Jones
Environment Service - Open Spaces Officer	06.01.2020 – Stuart Wallace
Environment Service- Landscape	29.01.2020 – Georgina Browne ( <i>extension agreed</i> )
Environment Service- Forestry	14.01.2020 – Andy Rowe ( <i>extension agreed</i> )
Historic Environment	No response
Local Plan Team – Community Infrastructure Levy	08.01.2020 – Ryan Searle
Local Plan Team – Neighbourhood Planning	10.01.2020 – Gemma Hankins and Melissa Burrow
Cornwall Fire and Rescue Service	No response
Transport	No response

### PTO for response from Tywardreath and Par Parish NDP Steering Group

**Note** that the page and paragraph numbers are different in the current version of the NDP, as wording has been amended in places.

<b>Affordable Housing</b>	
8.8 (page 18)	<p><b><i>“However, Cornwall Council did not ensure that only actual residents of Tywardreath and Par Parish completed the survey”</i></b></p> <p>This suggests housing need figures are determined from those persons already resident in the parish. Local connection qualification needs to be referenced more accurately for clarity. Local Parish Connection criteria can be found in the <a href="#">Allocations Policy</a> Appendix 2 page 11.</p>
8.10	<p>Suggested bedroom desire would need to be balanced against life stages and room to grow families. It may be that the apparent requirement is shaped by factors such as fear of reducing benefits because of a ‘spare’ bedroom.</p>
Policy F1f	<p>Could include reference to natural gardens which also promote biodiversity and room for leisure activities</p>
Policy BTT1	<p>Policy should allow for the modification of existing employment space to support the potential for growth and/or business models needing to change how they organise on site</p>
9.145	<p>It’s not just second homes that push up prices but also the design and location of accommodation.</p>
Glossary (page 112)	<p>As above Primary Local Connection in the glossary needs to be defined more accurately. The criteria quoted is from the Intermediate Homes Policy, this is only applicable for affordable homes provided by Private Developers and individuals. Local connection criteria and cascades can be referenced from the Council standard <a href="#">sect.106 template</a></p>
<p><b>Tywardreath and Par Parish NDP Steering Group (SG) response:</b>  <b>8.8., 8.10, 9.145 and Glossary:</b> All amended in line with recommendations including clarification on Local Parish Connection criteria and Primary Local Connection.  <b>F1:</b> amended.  <b>BTT1:</b> amended</p>	
<b>Environment Service - Ecology</b>	
Policy E1 (page 54)	<p>I was pleased to see that local green spaces are protected from development this is appropriate especially given the biodiversity value of some of these areas.</p>

Policy E2 and E3 (page 68 – 77)	Supported.
E4.1	This is an excellent policy and clearly states how biodiversity will be protected and enhanced. I was particularly pleased to see the net gain requirement stated under point (d). This policy should feature in all NDPs.
E4.2	Another excellent policy that I fully support.  Overall, I thought that the environmental section was excellent and would serve as a good model for others to follow.

**Tywardreath and Par Parish NDP Steering Group (SG) response:**  
All fine. No action required.

**Environment Service - Flooding**

Policy F1 (page 23)	<p>The inclusion of a flood risk policy is strongly supported, as are all the policies 1 to f.</p> <p><i>“Flooding, both pluvial and tidal, is a serious issue for Tywardreath and Par Parish....”</i></p> <p><b>Recommendation:</b> <i>Pluvial</i> – I suggest <i>surface water flooding</i> is a clearer term to use for a lay audience. There is a flood risk in this parish from <u>three</u> sources: fluvial (rivers), surface water and tidal. This sentence could be amended as follows: “Fluvial, surface water and tidal flooding is a serious issue...” or just “Flooding is a serious issue...”</p> <p><b>Recommendation:</b> Add a policy that “Development should be consistent with the management policies in the Shoreline Management Plan.” Also consider whether a Coastal Change Management Area should be defined at Par Beach.</p> <p>Cornwall Local Plan Policy 26 states that: “Development should take account of and be consistent with any adopted strategic and local flood and coastal management strategies including the Shoreline Management Plan and Catchment Flood Management Plans for Cornwall and the SW River Basin Management Plan.”</p> <p>The dunes at Par Beach provide an important natural flood defence for the low lying land behind. Whilst the</p>
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dunes have historically been accreting, sediment changes and sea-level rise projections indicate the potential for dune erosion in the future and exposure of historic landfill sites behind the dunes. It's estimated that possible erosion and recession of the mean high water position may reach 100m by 2105, which would affect the Par Sands Caravan Park.

The NDP evidence base should include the relevant Shoreline Management Plan (SMP) policies and the Par Beach Dune Management Plan (BDMP).

The Shoreline Management Plan is a policy document for coastal defence planning which sets out the recommended approach to managing the shoreline over the next 100 years. It's a material consideration for planning. The current Shoreline Management Plan is SMP2 which was adopted in 2011. A review of SMP2 was carried out in 2016.

The Par Beach Dune Management Plan provides a long-term (50 year) approach to beach and dune management at Par Sands that is based upon an up-to-date understanding of the beach-dune system and coastal processes at the site, as well as predictions of future coastal evolution. The Par Beach BDMP advises that Neighbourhood Plans should manage future development in coastal communities and any new development should not cause adverse effects or transfer coastal change risks to other areas.

The SMP and BDMP (4.2.5) both recommend that a Coastal Change Management Area may need to be defined at Par Beach.

The SMP2 policy for Par Beach is "Do Nothing" in Epoch 1 (up to 2025), then Managed Realignment from Epoch 2 (2025-2055). "Managed Realignment" means managing coastal processes to realign the 'natural' coastline configuration, either seaward or landward, in order to create a future sustainable shoreline position. At Par Beach Managed Realignment may require the future relocation of development and car parks behind the dunes in order to allow roll-back of the dune system.

Par Beach BDMP 3.5: "Future Changes: The key issue at Par Sands is that the dunes provide a flood defence function to the low-lying land behind. The dunes appear to be stable and in places accreting, so intervention required at present is probably limited. However, as sea

levels rise and without new influx of sediment, this accreting trend will like stop and reverse to become one of erosion. This will in turn lead to erosion and narrowing of the dunes, particularly if the dune system is constrained from migrating landwards due natural or human factors. The size of the dunes in this area will therefore reduce, making the system more vulnerable to storm impacts and increased risk of erosion leading to breaching and so flooding.” Fig. 3.11 in the BDMP shows the projected future erosion and flood risk at the dunes.

References:

Shoreline Management Plan:

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

Par Beach is in the SMP2 Gribbin Head to Par Docks Management Area 06 (MA06), Policy development Zone 3 (PDZ3), Policy Unit 6.3 (PU6.3).

Beach Dune Management Plan:

[https://www.cornwall.gov.uk/media/28276783/final-bdmp\\_par-sands\\_07-10-2016.pdf](https://www.cornwall.gov.uk/media/28276783/final-bdmp_par-sands_07-10-2016.pdf)

Please reference the Cornwall draft Planning for Coastal Change Chief Planning Officer’s Advice Note for more detailed guidance on development proposals close to the shoreline (including replacement housing):

<https://www.cornwall.gov.uk/environment-and-planning/planning/planning-policy/adopted-plans/planning-policy-guidance/cornwall-planning-for-coastal-change/>

For a good practice example of adopted Coastal Change Management Area policies please refer to Newquay NDP at: <https://www.cornwall.gov.uk/environment-and-planning/planning/neighbourhood-planning/neighbourhood-planning-in-cornwall/tab-placeholder/n-r/newquay-neighbourhood-development-plan/>

Part (d) – SuDS is an acronym for Sustainable Drainage **Systems**, not Sustainable Drainage **Schemes**

Part (f) - I support the encouragement of open natural SuDS in the NDP. Given the value of blue-green infrastructure in this parish is having a “**preference**”

<p>Policy F2 and F3 (page 25)</p>	<p>giving strong enough direction? It could be strengthened by using the term “<b>priority</b>” rather than preference.</p>
<p>Policy E4.1 (page 83)</p>	<p>I strongly support these policies.</p> <p>(d) New information on Cornwall Council’s biodiversity net gain approach is available at:  <a href="https://www.cornwall.gov.uk/environment-and-planning/planning/planning-policy/adopted-plans/planning-policy-guidance/biodiversity-net-gain/">https://www.cornwall.gov.uk/environment-and-planning/planning/planning-policy/adopted-plans/planning-policy-guidance/biodiversity-net-gain/</a></p> <p>e) v – the reference to biodiversity off-setting should make it clear that offsetting is a last resort and the planning mitigation hierarchy should be followed first:</p> <ul style="list-style-type: none"> <li>• Enhance habitat</li> <li>• Avoid habitat loss</li> <li>• Minimise habitat loss</li> <li>• Restore habitat loss</li> <li>• Compensate for habitat loss</li> <li>• Offset Habitat loss</li> </ul> <p>vi) The Cornwall Biodiversity SPD is now called Cornwall Planning for Biodiversity Guide”.  See: <a href="https://www.cornwall.gov.uk/environment-and-planning/planning/planning-policy/adopted-plans/planning-policy-guidance/cornwall-planning-for-biodiversity-guide/">https://www.cornwall.gov.uk/environment-and-planning/planning/planning-policy/adopted-plans/planning-policy-guidance/cornwall-planning-for-biodiversity-guide/</a></p>
<p>Policy E4.2 (page 84)</p>	<p>iv) Please note that Conservation Areas provide protection to all trees within the designated area.</p>
<p>Policy H4</p>	<p>I support these policies – they will contribute towards delivery of the Cornwall Environmental Growth Strategy.</p> <p>Buildings should be designed in line with the Energy Hierarchy:</p> <ol style="list-style-type: none"> <li>1. Lean: Reduce energy demand (e.g. passive-solar design, triple glazing, air tight, thermal mass, thermal stores, sun pipes, natural ventilation, motion activated lights).</li> <li>2. Mean: Use energy efficiently (e.g. LEDs, A* rated appliances).</li> <li>3. Green: Use renewable energy (e.g. solar, wind, hydro, geothermal, bioenergy, combined with battery storage for extra resilience).</li> <li>4. Clean: Use low carbon energy sources and systems (e.g. heat pumps, CHP).</li> <li>5. Fossil fuels should be avoided – they emit</li> </ol>

	<p>greenhouse gases and will make communities vulnerable to energy supply chain failures and price rises. Fuels that have to be delivered (oil, LPG, wood) are not good for security of supply during prolonged extreme weather events.</p> <p>A policy for replacement dwellings could be considered to discourage any reduction in the size of gardens or gardens being replaced with hard surfacing for parking. For instance, “Replacement dwellings should maintain and preferably enhance habitat connectivity and flood management by retaining trees and green corridors and using permeable surfaces.”</p>
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**Tywardreath and Par Parish NDP Steering Group (SG) response:**

All **Environmental** policies have been amended in line with the above suggestions. **Coastal Change** policy/designation of Par Beach as a Coastal Change Management Area.

The Environment Section, Flooding Officer gave a detailed response above. However, following wider discussions with other CC officers, the Steering Group working party decided not to pursue the recommendations at this stage, as CC is currently developing a Climate Change DPD. In addition, it should be noted that Par Sands does not stand in isolation within Tywardreath and Parish. To the west is the Par Docks area in the St Blaise NDP area and to the east is Fowey NDP area. A shoreline management policy would need to be drafted in consultation with both these areas and possibly Carlyon Parish too, given the longshore drift. Instead, 2/3 paragraphs of new text has been inserted into the NDP to highlight the flood risk in the parish and there is a new Appendix M with maps and references to source information. Policy F1 now has a new statement – g).

**H4 Energy Hierarchy** referred to in policy and summary doc included in Appendix **Replacement dwellings** Following further consultation with CC Neighbourhood Planning Officer Team, a replacement dwellings policy was considered to be unnecessary.

**Environment Service - Open Spaces**

Policy E1	<p>In July 2014 Cornwall Council adopted the Open Space Strategy for Larger Towns in Cornwall as interim planning guidance pending the adoption of the Local Plan. It is expected to be taken forward as an evidence base for a Supplementary Planning Document (SPD) – for further details see <a href="http://www.cornwall.gov.uk/environment-and-planning/parks-and-open-spaces/open-space-strategy-standards">http://www.cornwall.gov.uk/environment-and-planning/parks-and-open-spaces/open-space-strategy-standards</a>. The same study was subsequently undertaken for all but the rural north &amp; east of the parish in 2016, which involved consultations with the parish council. We would recommend that the NDP references the study and signposts to the resulting open space provision standards.</p>
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	<p>Whilst the NDP has evaluated the open spaces with the aim of their added protection under the Local Greenspace designation, the NDP has not considered how potential investment is needed to improve these spaces, in terms of identifying priority actions based upon local priorities and in line with the open space standards. The NDP represents an excellent opportunity to establish a mechanism for developing aspirations for medium &amp; long term projects to enhance the coastal areas and other open spaces in the parish (such as at Par Track (GS-m)), beyond the more immediate StARR work.</p>
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**Tywardreath and Par Parish NDP Steering Group (SG) response:**  
 The 'Open Space Strategy for Larger Towns in Cornwall' is referenced in the NDP and Evidence Summary. The three 2016 Open Spaces docs referring to the parish are referenced in NDP and Evidence Summary and available on the NP section of the Parish Council website. The SG in consultation with relevant Parish Councillors has decided not to establish a list of medium and long term projects, as it is considered that this sits more appropriately with the Parish Council.

**Environment Service - Landscape**

<p><b>Policy E4.1 and E4.2</b></p>	<p><b>The importance of Cornish Hedgerows</b>          The discussion on Cornish hedges is comprehensive, reference could also be made to <i>Cornwall Council 'Biodiversity' Guide</i>; notably all proposals should follow the guidelines outlined in <i>Appendix C – 'Cornish hedges and Development'</i> where the most beneficial scenarios are given to guide development of any scale close to hedgerows. Clear guidance could include something like ; <i>'Development needs to retain existing landscape features such as trees, hedge boundaries, wildlife habitats etc and provide an appropriate buffer/margin in line with Cornwall Council 'Biodiversity' Guide'</i></p> <p><b>Trees</b>          The consideration of the contribution that trees make to the quality of the landscape within Tywardreath and Par Parish is comprehensive with Tree Preservation Orders, Ancient Woodland and a number of woodland County Wildlife Sites all recognised.</p> <p>Perhaps further discussion could consider whether particular tree species make a strong contribution to Landscape Character/distinctiveness etc.?</p> <p>Although a quantified replacement clause in the Policy is helpful it could at times be detrimentally prescriptive where greater numbers are called for or where the loss of a particularly notable mature Oak for example cannot</p>
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be reasonably replaced by say 3 whips. It is recommended that the Policy expects ALL development proposals to both retain and protect existing trees as well as making provision for new 'Trees of the Future' as most landscapes contain an aging tree stock with limited presence of young and young-mature tree stock. It could also be recognised that increasing canopy cover will also help combat climate change and reference could be made to Cornwall Council's 'Forest for Cornwall' initiative.

Statements about the importance of the existing tree stock to the local landscape character will be helpful to bolster the retention of trees in development proposals. Reference could again also be made to the guidance given in the *Cornwall Council 'Biodiversity' Guide*; this document contains very useful appendix documenting how best to retain Cornish hedgerows within development (most landscape trees are of course located on the hedgerows) as well as including useful tables of tree species found within Cornwall. For example are some tree species particularly notable across the Parish? If so it would be helpful to recognise this. As mentioned a policy could be extended to include; *to retain and protect existing tree cover and to encourage the planting of 'trees for the future' to counteract the aging tree stock and to provide a breadth of species that will help to counteract the impact of tree disease*. (eg. Ash Dieback Disease is likely to result in a substantial loss in the Cornwall's Ash population). The policy could include an expectation that any new development makes a contribution towards new tree stock.

### **Landscape Character**

The 2007 *Cornwall and Isles of Scilly Landscape Character Assessment (LCA)*; is a good starting point in considering Landscape Character, though this level of LCA could be lacking in the fine-tuned detail needed to be robust in steering development location, detail, scale and mass etc., mention could be made of the *Management Guidelines* for each LCA as this could help to support the Landscape aspirations of the NDP; it will depend on what has been identified and how this particularly relates to the Parish (ie only include where relevant to Tywardreath and Par Parish).

It is therefore recommended that the '*Cornwall and Isles of Scilly Landscape Character Study*' is included in the evidence base and that it is referenced in the text; this is a good start in evidencing the landscape character of Tywardreath and Par Parish together with any local

	<p>detail that is specific to Tywardreath and Par Parish. The Landscape Character Area (LCA) found within the Parish is;</p> <ul style="list-style-type: none"> <li>▪ CA 39 – ‘St Austell Bay and Luxulyan Valley ’</li> </ul>
<p><b>Tywardreath and Par Parish NDP Steering Group (SG) response:</b>  The <b>Environmental policies</b> have been amended in line with the above. Landscape Character Assessment now incorporates a note in respect of above recommendation.</p>	
<p><b>Environment Service - Forestry</b></p>	
<p>Policy E4.1 (page 83)</p>	<p>Suggested additions in red:</p> <p>c) Development proposals should recognise the importance of hedges/field boundaries as ‘bat <b>and wildlife</b> corridors’ taking all possible measures to minimise disruption including with regard to lighting;</p> <p>e) Development proposals should demonstrate that they:</p> <p>i) avoid designated areas of semi-natural habitat and seek to protect large areas of semi-natural habitat in non-designated areas, especially Cornish hedges <b>and Ancient/Veteran trees</b>; and</p> <p>iii) ensure that there is potential to retain, restore and re-create habitat linkages, especially Cornish hedges <b>and linear tree features</b> as part of developments;</p>
<p>Policy E4.2 (page 84)</p>	<p>a) Development proposals should be accompanied by a survey <b>in accordance with BS5837</b> that establishes the health and longevity of any affected trees or hedgerows and a management plan to demonstrate how they will be so maintained. Developers should follow the guidance provided by the Cornish Hedges Group concerning the retention and re establishment of hedges on development sites.</p> <p>b) Development proposals that impact on trees or Cornish Hedges c.f. Cornish Hedges, Figure 12 will only be supported if they:</p> <p>i) sympathetically incorporate and retain trees and Cornish Hedges or hedgerows of good arboricultural and amenity value <b>in a sustainable way</b> into the overall design of the scheme; and</p> <p>ii) include measures to ensure their protection during the course of development <b>using recommendations in BS5837 as a minimum</b> and their continued survival in the long term; and</p> <p>iii) maintain a minimum buffer of at least 15 metres in</p>

	<p>width between ancient woodland and Ancient/Veteran trees and any development boundary; and</p> <p>iv) retain and maintain trees subject to Tree Preservation Orders and seek to protect and maintain non-designated native and naturalised trees that provide landscape character, visual amenity, skyline interest, natural shelter/windbreak, or are described in the relevant character area description covering the application site; and</p> <p>v) incorporate the planting of additional trees at a minimum of 3 trees for each dwelling or 1 tree for each 50 sqm of gross business floorspace. Where development proposals result in the loss of trees, replacement should be at a ratio of 3:1 to ensure rapid canopy replacement. Any replacement planting should be of a proven Cornish provenance. See Cornwall Council Guidance or any update.</p> <p>3 for 1 is a meaningless target, it could be reached by taking out 1 mature Oak and planting 3 Sycamores which would reduce biodiversity or 3 apple trees could be planted so the loss in canopy cover would never be replaced. Land is often tight on sites and putting 3 trees in areas where they don't have the room to grow condemns them to a short life span but it meets the 3 for 1 criteria but the loss in canopy cover would not be replaced. A better statement would be to state that 'Every tree removed should be replaced with 2 similar sized trees planted in areas where they are able to attain mature proportions without causing a nuisance'.</p>
<p><b>Tywardreath and Par Parish NDP Steering Group (SG) response:</b> Environmental policies have been amended in line with the above recommendations and/or suggested wording.</p>	
<p><b>Local Plan - CIL</b></p>	
<p>General</p>	<p>The Parish of Tywardreath and Par Parish is within CIL Charging Zone 4. The adopted CIL Charging Schedule sets out that new developments of 1-10 dwellings will be liable to pay £100 per sqm, and developments of 11 or more will be liable to pay £35 per sqm. However, affordable housing and self-build developments are able to claim exemption from liability to pay a CIL charge. Rural Exception Sites are also exempt from CIL.</p> <p>From 1 January 2020, indexation will apply to the adopted rates - this is set out in the <a href="#">Annual CIL Rate Summary 2020</a>, which shows the rates that will be</p>

<p>Para 9.61</p>	<p>applied to permissions granted (or prior approval developments commenced) during the calendar year 2020.</p> <p>CIL came into effect in Cornwall on 1 January 2019. From this date, developments creating one or more dwellings, or new floorspace of 100sqm or more, could be charged CIL. However, CIL will only become payable on commencement of a development (not granting of planning permission), which means there is always likely to be delay between a development being granted permission and when it has to make a CIL payment.</p> <p>Of the CIL income received, 5% can be retained by the Charging Authority (Cornwall Council) for administering the process, 15% (25% for a parish with a made NDP) is paid directly back to the Town or Parish Council (the 'Neighbourhood Portion') in which development takes place (the 'Neighbourhood Portion'), and the remaining 70-80% (the 'Strategic Share') must be spent on infrastructure to support the development of the area. The CIL Strategic Share in Cornwall is going to be made available to communities, organisations, and other Council services, via a bidding process.</p> <p>A funding process and application criteria for this are now being developed. It is unlikely that a funding round will be held until mid-2020 at the earliest.</p> <p>More information on CIL can be found on the Councils website at <a href="http://www.cornwall.gov.uk/cil">www.cornwall.gov.uk/cil</a>. Any specific queries can be sent to <a href="mailto:cil@cornwall.gov.uk">cil@cornwall.gov.uk</a>.</p> <p>Regulation 123 lists have been removed and will be replaced by an annual infrastructure funding statement which will set out how much money has been raised through developer contributions (both through CIL and section 106 obligations) and how it has been spent.</p>
<p><b>Tywardreath and Par Parish NDP Steering Group (SG) response:</b>  We note that guidance in this area is being amended on an ongoing basis (3 times in the last 18 months to our knowledge). We have amended the information in the Justification in line with current information. We will follow the External Examiner's guidance as to whether the policy is appropriate for inclusion.</p>	

## Local Plan – Neighbourhood Planning

3.1 (page 9)	Change references to ‘Sustainability Appraisal’ to ‘Sustainability Check’. Sustainability Appraisal is a formal process involving consultation etc, so just refer to ‘Sustainability Check’ (I am ensuring our templates are updated to correct this).
Page 12	I think these must be quotes from the local community and info gathered from your consultations, but it doesn’t say that. Suggest you change the heading to reflect the source of this info
Policy BTT2 (page 36)	Providing access to the beach must also be balanced with the importance of protecting the dune system (see Flooding response above for detail). The dunes play a vital role in flood defences as well as their ecological and aesthetic value.
Policy BTT3 (page 38)	A list of ‘nice to haves’ in the policy text, so nothing stands out as a priority.  (b) – what scale of development is required to identify ‘level of traffic’? ‘Major development’ is referred to in policy 27 of CLP in terms of a requirement to provide additional information and a full transport assessment (which would look at traffic impact resulting from the development) is only required for large scale developments.  (f) – 2 spaces for all dwellings? What about studios, 1 bed flats etc?
Policy E1 (page 54)	Suggest you add a sentence to the start of this policy:  ‘The open spaces shown in Figures xxx are designated as Local Green Spaces in accordance with paragraph 99 of the National Planning Policy Framework’.
Policy E5.2 (page 90)	The first sentence is supporting text and not policy wording
Policy E5.3 (page 91)	The first paragraph is supporting text and not policy wording
Policy H3 (page 105)	(a) Define small scale

**Tywardreath and Par Parish NDP Steering Group (SG) response:**

**3.1** : change made throughout documentation.

**Page 12 infographic:** title changed; quote marks inserted; and phrases expanded to communicate more effectively.

**BTT2** Reference made to 'Cornwall Beach and Dune Management Plans (BDMP)– Par Sands', 2016, Cornwall Council in both Justification and Policy. The BDMP has been uploaded to the NP section of the PC website.

**BTT3** Policy amended to prioritise accessibility and public transport; and to explain the need for traffic assessment whatever the scale of the development. Number of parking spaces per bedrooms altered.

**E1:** amended in line with recommendation.

**E5.2 and E5.3:** introductory policy wording moved to Justification section.

**Policy H3:**

Fowey NDP External Examiner removed the suggested maximum number of dwellings, so SG decided against doing this in our NDP. Small-scale in the context of housing development was already defined in the Glossary and Evidence Base, but all references to small-scale have been strengthened and there is explicit mention in the H3 policy itself.